

Tuesday, 14 February 2023

(10.30 am)

LADY HALLETT: Good morning. This is the second preliminary hearing into Module 1 of the Covid-19 UK Inquiry. It is being held remotely and therefore I shall keep my observations to a minimum and I shall try to avoid interrupting the advocates who are speaking.

We intend to deal with a number of important issues that both counsel to the Inquiry and the Core Participants have raised in their written submissions to me. I am very grateful to all of them and I hope that, given I have received the written submissions in advance and had an opportunity to consider them, the advocates can focus on the main parts of their submissions that they wish to highlight today.

I am sitting here in a hearing room on my own. Counsel to the Inquiry are in a separate room and other participants are attending remotely, and I believe that everyone has been informed as to the system that has to be employed should anybody wish to speak who hasn't already given notice of their intention to do so.

So with those observations, given we have so much to get through today, I will call on Mr Hugo Keith, King's Counsel, counsel to the Inquiry. Mr Keith.

MR KEITH: (... unclear ...)

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I have seen a note from the stenographer that it's not clear enough for the verbatim record and so I will rise to see if the problem can be sorted. I'm very sorry to everybody.

MR KEITH: Thank you, my Lady.

(10.35 am)

(A short break)

(10.41 am)

LADY HALLETT: Mr Keith, we hope the problem has been fixed. Would you like to speak so we can test the system.

MR KEITH: We believe it has been fixed, my Lady.

LADY HALLETT: Thank you.

MR KEITH: Thank you. So as I was saying, but I wouldn't have been heard saying it, written submissions for today's hearing have been received from eight Core Participants, in one case jointly, and we're very grateful to them for having provided us with their observations and their insights and for the brevity with which they have done so. I believe you will be hearing oral submissions, my Lady, from five of the Core Participants.

Turning to the matters on the agenda, the first issue is to address the matter of progress.

Since 4 October, a great deal of work has been done and at a very considerable pace. As of yesterday,

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LADY HALLETT: Can you pause, Mr Keith. I don't know if the public and the Participants are having problems but your sound is not perfect.

MR KEITH: Yes, it appears to be ... (*unclear*).

I think it's been solved. The echo's disappeared.

Can you hear me clearly now?

LADY HALLETT: Yes, we can at the moment, Mr Keith. I'll interrupt you, if I may, if there are problems again.

Submissions by MR KEITH, KC

MR KEITH: Thank you.

So, my Lady, this is the second preliminary hearing of Module 1, the first one held by you on 4 October, some four months ago. I don't wish to reintroduce the Core Participants or their legal representatives. There remain (... *unclear* ...)

I should say that following the first preliminary hearing on 4 October a number of out of time applications were made unsuccessfully --

LADY HALLETT: Mr Keith, I'm sorry. Can you pause there.

I'm afraid the audio is not good. If people who are following online have satisfactory audio, that's okay, I am prepared to put it up with, but I just want to check. I wonder if we could find other members of the Inquiry team following online whether they can hear what Mr Keith is saying clearly.

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160 Rule 9 requests have been sent out in Module 1, either in draft form (that is to say, they may be subject to amendment in light of the initial response from the recipient) or in final form, some of them are very long and complex, and the Inquiry team has also had multiple meetings with many of the Government Rule 9 recipients. Only a handful of first time Rule 9s remain to be issued, although of course we anticipate having to send more Rule 9s out in due course, more iterative Rule 9s, as our understanding becomes more complete and we're able to identify areas which may require further exploration.

We provided details of the Rule 9s which had been issued by 30 January, in annex A of the CTI note of that date, and in that 27-page summary the broad nature of 49 of the Rule 9 requests, which had been sent out on 30 January, were specifically set out. We also set out overviews of other Rule 9 requests to bodies in the voluntary community sector, the trade unions, medical, scientific and other relevant professional bodies and individual scientists. As Mr Weatherby, King's Counsel, almost submitted in his written submissions, the net has been cast widely. Since 30 January, around 45 further requests have been made. So we've received draft and, in some cases, final witness statements from 42

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1 organisations and individuals.
 2 My Lady, the Core Participants were kindly
 3 provided by the legal team on Friday with a full list of
 4 the organisations and individuals who have provided
 5 draft or final witness statements but to give some idea
 6 of the scope and extent, for public purposes, they
 7 include: the Cabinet Office; clinically vulnerable
 8 families; Covid-19 Bereaved Families for Justice; the
 9 Department of Digital Culture, Media and Sport; the
 10 Emergency Planning Society; Inclusion Scotland; the
 11 Local Government Association; Government Equality Hub;
 12 Public Health Wales; Public Health Scotland; the
 13 Northern Ireland Council for Voluntary Action; the TUC;
 14 the UKHCA; the Vaccine Impact Bereaved United Kingdom;
 15 the Welsh Local Government Association, and many, many
 16 more.

17 The majority of the remainder of the statements
 18 and responses to questionnaires are expected to be
 19 received during the course of this month. Fourteen
 20 corporate statements or full statements, some of them
 21 likely to be very lengthy, are expected this week. It
 22 follows that many thousands of documents and exhibits
 23 have already been received, I think, from around 16
 24 document providers so far and those documents amount to
 25 hundreds of thousands of pages. Not all of them are of

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1 have been provided by all of the Government departments
 2 whom we have approached.

3 I must also make clear that each redaction in this
 4 provision and the redaction process is naturally
 5 undertaken by the Inquiry, rather than by the particular
 6 Government department involved, and it will also be
 7 subject to change as a result of our own ongoing
 8 scrutiny of the evidence and any matters raised by the
 9 Core Participants following disclosure to them of the
 10 redacted document.

11 The problem, however, encountered by the Inquiry
 12 is that, given the profusion of policy documents and
 13 Government emails, there are literally thousands of such
 14 manual redactions that are required. In addition, in
 15 many cases, it's not proved possible for the reviewers,
 16 the paralegals and other lawyers who do the review
 17 process, to be sure that the particular name which they
 18 were seeking to redact was actually irrelevant,
 19 notwithstanding the exclusion of that particular name
 20 from the lists provided by the Government departments.

21 So the process of review and disclosure has slowed
 22 down considerably, which is why the Core Participants,
 23 although they did receive the first disclosure tranche
 24 before Christmas, have received in total only around 700
 25 documents in the first three tranches.

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1 course relevant and disclosable -- that's not how the
 2 system works -- but there's no doubt that we have
 3 received a very large amount of documentation.

4 I want to commend, if I may, the legal team in
 5 Module 1 for their diligence and hard work in scoping,
 6 drafting and issuing so many Rule 9s and in dealing with
 7 the vast array of documentation which has been received.

8 Turning to disclosure. The extremely burdensome
 9 process whereby each document must be individually
 10 reviewed, then sifted for relevancy, redacted where
 11 necessary and then sent back to the document provider
 12 for comment, which comment must be provided within three
 13 days, has, however, been problematic.

14 As we explained in the CTI note of 30 January at
 15 paragraph 11, each and every document is required to be
 16 reviewed and irrelevant information, including to a very
 17 large extent personal data redacted in accordance with
 18 the redaction protocol, must be removed. Such
 19 irrelevant information includes the names of junior
 20 officials who have not taken relevant decisions
 21 themselves or substantially contributed to the
 22 decision-making or had an important role in
 23 implementation of decisions. Such persons can be
 24 distinguished from those persons who held more senior
 25 positions in the senior Civil Service, the names of whom

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1 Although those disclosure tranches did include
 2 exhibits from the main UK Government department
 3 concerning preparedness (namely, the Cabinet Office),
 4 the amount of disclosure was simply not as we envisaged
 5 it would be.

6 As you would expect, my Lady, the Inquiry team has
 7 taken a number of steps which we're confident will speed
 8 the process up, while still ensuring that only
 9 irrelevant information is redacted, and those steps
 10 include increasing the number of reviewers available
 11 each day to review the documents. The Core Participants
 12 may rest assured that very considerable resources are
 13 being directed at this process.

14 We hope that, by the time the process is running
 15 smoothly, the number of documents reviewed weekly, of
 16 which the Core Participants then receive a proportion,
 17 will run into the thousands. Another step taken is to
 18 put into place a system whereby the headers to the
 19 emails are block redacted in the first instance, leaving
 20 the later parts of the particular email to be subject to
 21 manual redaction of specific names. We're also working
 22 towards the implementation of a system of automatic
 23 redaction, a mechanical redaction process, by the
 24 document handling system. So those steps together will,
 25 we're confident, lead to the process speeding up.

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1 Nevertheless, I accept that, whilst we have
2 received the documents from the various material
3 providers, broadly in line with the timetable that we
4 initially envisaged, we have not been able to get
5 relevant documents out to the Core Participants as
6 speedily as we would have wished.

7 My Lady, that brings me to the subject of the
8 commencement date of the public hearing. As I submitted
9 to you on the last occasion and as you observed in the
10 course of your first preliminary hearing and in your
11 ruling which postdated that hearing, the Core
12 Participants play a vital role in this collaborative,
13 forensic process. One of the major ways, as you know,
14 in which they participate is by way of being able to
15 scrutinise the disclosed relevant documentation for
16 themselves and thereby assist with the identification of
17 suitable witnesses to be called and with the important
18 process by which is lines of enquiry and topics are
19 drawn up for the purposes of questioning those
20 witnesses.

21 In this way, amongst others, the Core Participants
22 participate meaningfully in the public hearing. Put
23 bluntly, we agree that it would be unacceptable for the
24 voluminous disclosure, for example, to be made on the
25 eve of the hearing, as is feared by one of the Core

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1 A related issue is the length of the Module 1
2 public hearing. Some of the Core Participants argue
3 with considerable force that the current provisional
4 timetable of four weeks is too short to address the
5 issues that will arise in Module 1 and to be able to
6 call the number of witnesses from whom you must surely
7 hear. I agree. A fortuitous consequence of putting
8 back the start of Module 1, if that again be your
9 decision, would be that it would allow us to extend
10 modestly the length of the public hearing and I would
11 invite you to consider doing so if you ordered that the
12 commencement be put back.

13 May I then turn to scope, which comprises
14 an important part of the submissions made by the various
15 Core Participants. The Core Participants have very
16 helpfully enquired as to our position in relation to
17 such matters as devolved preparedness in Northern
18 Ireland, including issues related to the collapse in the
19 power sharing agreement, the land border with the
20 Republic of Ireland and particular role and functions of
21 local authorities. Also issues arising in relation to
22 the Welsh infrastructure dealing with preparedness,
23 including issues of funding, intergovernmental
24 relations, coordination and the standard in approach to
25 planning and preparation.

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1 Participants, because that would clearly undermine their
2 ability to participate meaningfully.

3 As I cannot guarantee that, as was provisionally
4 hoped to be the case, that the Core Participants will
5 receive almost the all the disclosure to which they are
6 entitled by mid-March, I must invite you to consider
7 putting back the provisional start date of May to early
8 June.

9 In the general scheme of your Inquiry, this is
10 a fairly modest adjournment application but it will
11 allow, if you grant it, a proper opportunity to the Core
12 Participants to get on top of the materials and, as
13 a necessary part of that process, time to get the
14 documents to them.

15 My Lady, you will immediately have appreciated of
16 course that the putting back of Module 1, if that be
17 your decision, will have a direct impact on Module 2 and
18 indeed on each of the Inquiry's remaining modular public
19 hearings, though not necessarily on the overall length
20 of the Inquiry. But given that today is concerned with
21 Module 1, I don't propose to say any more on that
22 subject. Suffice to say a great deal of thought will of
23 course be given to the various ramifications if you do
24 order a delay, modest though it may be, in the
25 commencement of Module 1.

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1 One of the Core Participants has also asked us to
2 address preparedness for infection control in hospitals
3 and resourcing for infection control measures in
4 hospitals and care homes, also in relation to PPE and
5 stockpiling.

6 The Covid-19 Bereaved Families for Justice Cymru
7 also ask whether we've issued Rule 9s relating to the
8 Welsh Government's role in resilience and civil
9 emergencies, into organisational co-operation and
10 pandemic planning.

11 Query has been raised in relation to the World
12 Health Organization at CEPI, a coalition for epidemic
13 preparedness innovations, whose offices are in Oslo,
14 London and Washington.

15 The Covid-19 Bereaved Families for Justice group
16 and the Northern Ireland Bereaved Families for Justice
17 group, together for the purposes of this preliminary
18 hearing, also ask about the state of play concerning the
19 Rule 9s for key politicians, civil servants and
20 administrators from the UK Government and the devolved
21 administrations, which is an issue that we flagged up in
22 the CTI note.

23 Finally, the TUC has asked for more detail about
24 later modules in light of its concern about the extent
25 of overlap that may exist between Module 1 and the later

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1 modules. So by way of example, my Lady, they ask
2 whether preparedness in connection with social care, to
3 give just one example, be considered in Module 1 or left
4 for your consideration in later modules, in particular
5 the module dealing with the care sector, and similarly
6 preparedness in relation to PPE, preparedness in
7 relation to the Health & Safety Executive.

8 So dealing with them all together, may I just
9 observe, by way of initial comment, that we understand
10 that the Core Participants have not of course seen the
11 actual Rule 9s and so quite understandably cannot know
12 the nature of the mesh, even if they know that the net
13 has been widely cast. The actual scope of Module 1 and
14 the issues and questions that will arise for scrutiny
15 will, however, become clear from the material that is
16 gathered under the Rule 9 process and then disclosed and
17 from the witness evidence proposals. But in advance of
18 reaching that stage, I can provide the following
19 information.

20 In relation to Northern Ireland, we had sent
21 a Rule 9 request to the Local Government Association,
22 the Welsh LGA, the Convention of Scottish Local
23 Authorities, the Northern Ireland LGA and the National
24 Police Chiefs' Council, in order to ascertain the
25 position and to receive information about the local

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1 resourcing for PPE and stockpiling, some part of
2 Module 1 will of course be concerned with the
3 overarching, high-level issue of funding and resourcing
4 generally across the organic structures concerned with
5 preparedness. But given that Module 1 is concerned with
6 the structural position and the policy position, those
7 specific issues are more readily considered in the
8 context of your later modules because, of course, they
9 deal more directly with the specific issues of PPE,
10 stockpiling and infection control measures. So they
11 will be more appropriately addressed later.

12 In relation to the World Health Organization and
13 CEPI, we've contacted the World Health Organization.
14 They were unable to provide a written statement. Rule 9
15 obviously has intraterritorial jurisdiction in effect
16 only but they had provided us with certain information
17 and material which we are considering and we will ponder
18 further the utility of contacting the CEPI.

19 We've sent out approximately 45 Rule 9s to key
20 politicians, civil servants and administrators from the
21 United Kingdom Government and the devolved
22 administrations, and more are imminent. So in response
23 to the issue and the question raised by the Covid-19
24 Bereaved Families for Justice and Northern Ireland
25 Covid-19 Bereaved Families for Justice, the state of

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1 government level and the structure, the role that they
2 play in the overall structure for preparedness and civil
3 emergencies.

4 This has been done with the intention of gathering
5 a range of evidence across the whole United Kingdom but,
6 in particular, in relation to the key players at that
7 level. They were involved in local resilience forums,
8 regional resilience partnerships, and local resilience
9 partnerships in Scotland and, most importantly for the
10 purposes of the Northern Ireland Covid-19 Bereaved
11 Families for Justice, question the emergency
12 preparedness groups in Northern Ireland.

13 We readily appreciate that Northern Ireland is
14 distinct in terms of which bodies carry relevant
15 statutory duties related to civil contingency matters
16 and so the Rule 9s which have been issued to the
17 emergency preparedness groups are specifically designed
18 to ensure that we have a more complete picture of
19 preparedness in Northern Ireland.

20 In relation to the request concerning the Welsh
21 Government, we have addressed the majority of the issues
22 raised in the written submissions but, in relation to
23 the specific issues of preparedness for infection
24 control in hospitals and resourcing for infection
25 control measures in hospitals and care homes and

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1 play concerning Rule 9s in relation to that part of the
2 Government structure is that it is well underway and
3 a great deal of work has been done dealing with
4 gathering evidence from those respective bodies.

5 The final matter is that of the overlap concern
6 raised by the TUC. Again, I repeat that high-level
7 preparedness on the part of the United Kingdom
8 Government and devolved administrations will of course
9 be addressed in Module 1 but sectorial and operational
10 readiness will be addressed as part of your later
11 modules and I hope that will help give some guidance to
12 the Core Participants as to our direction of travel.

13 The next item concerns the document management
14 system, Relativity. Some Core Participants have
15 expressed a degree of frustration with the functionality
16 of the Relativity system. One Core Participant invites
17 you, my Lady, to change horses in mid-stream and move to
18 an entirely different system.

19 Relativity, my Lady, is arguably the industry
20 standard in the context of statutory inquiries and has,
21 in fact, stood up well to the demands placed upon it.
22 We, of course, acknowledge that functionality differs
23 between systems but may I suggest that the answer to the
24 possible lack of familiarity with the functionality of
25 the system and its peculiarities, it's for the Core

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1 Participants to contact the Inquiry secretariat for
2 assistance, as one or two of them have already done.
3 Epiq (who are the body concerned with the
4 management of the system and its provision) have, in
5 fact, provided sessions over the last two weeks, having
6 invited all Core Participants, and have emailed the Core
7 Participants again with a link which will enable them to
8 access videos of those training sessions.

9 One Core Participant wisely, to ease its own use
10 of the system, persuaded the Inquiry team to alter the
11 field tagging system so that documents can be marked
12 with additional fields relating, in fact, to relevancy
13 and whether or not the particular document was a key
14 document, alongside the comments which they are manually
15 able to make on the system.

16 So we would invite the Core Participants to
17 contact the secretariat and if they've got problems or
18 difficulties with their use of the system to see what
19 assistance can be given to them.

20 My Lady, turning then to the issue of
21 Parliamentary privilege, we raised this issue, my Lady,
22 in the CTI note out of an abundance of caution so that
23 the Core Participants could understand the general
24 approach that the Inquiry is likely to take.

25 At the heart of this issue is Article 9 of the
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1 "place" must be given a meaning beyond that of "court".

2 Secondly, that the Joint Committee on
3 Parliamentary Privilege of March 1999 opined that
4 a place did indeed include a tribunal and that, were
5 this issue to have arisen in the context of the
6 statutory scheme then in force in 1999, which was the
7 predecessor Act to the Inquiries Act 2005, namely the
8 Tribunals of Inquiry (Evidence) Act 1921, the privilege
9 would undoubtedly apply.

10 The Joint Committee, in fact, recommended the
11 place should be defined in statute to include any
12 tribunal having power to examine witnesses on oath so
13 that any statutory inquiry would be such a place. That
14 would then bring, or would have brought, the position in
15 the United Kingdom into line with the Australian
16 position, under the Parliamentary Privileges Act 1987
17 Australia, which replaces the wording "court or place"
18 with the words "with any court or tribunal".

19 I should say, lest Mr Weatherby is concerned that
20 we are infringing Parliamentary privilege by referring
21 to Parliamentary material for the purposes of this
22 debate, you are, of course, empowered as a rule court to
23 rule on whether the privilege applies at all and there
24 is high authority, a Privy Council case of
25 *Buchanan v Jennings*, which provides or makes plain that

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1 Bill of Rights 1689 which provides that the freedom of
2 speech and debates or proceedings in Parliament ought
3 not to be impeached or questioned in any court or place
4 out of Parliament. An important point of principle does
5 in theory arise, namely whether in a statutory inquiry,
6 such as your own, the impeaching or questioning of
7 statements made in or to Parliament or the introduction
8 to these proceedings of Parliamentary statements or
9 reports, for the truth or worth or validity of what is
10 being said, infringes Article 9 of the Bill of Rights.

11 Of course, there's no debate and there's no issue
12 about this, that reference may be made to any
13 Parliamentary material for historical context, but what
14 Mr Weatherby, King's Counsel, has suggested in his
15 written submissions is that there is a purposive
16 argument which leads to the proposition and the
17 conclusion that because a statutory inquiry, including
18 one under the 2005 Act, is not permitted to enquire into
19 civil or criminal liability, it is not therefore a place
20 or a court which attaches the protections of
21 Parliamentary privilege. So, in essence, he advances
22 a purposive argument. But, on the face of it, we
23 respectfully suggest that that argument is unlikely to
24 be correct. Firstly, on the face of it, this Inquiry is
25 arguably any court or place out of Parliament. The word
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1 the courts may refer to Parliamentary material for the
2 purposes of ruling on whether or not the privilege
3 attaches.

4 Thirdly, the subsequent Government consultation
5 paper to the Joint Committee report proceeded on the
6 premise -- the clear premise that the privilege did
7 extend to tribunals and courts and the Joint Committee
8 on Parliamentary Privileges report of June 2013
9 recommended that no statutory changes were needed.

10 We might also add that the purposive argument
11 advanced is probably wrong because it fails to recognise
12 that Parliamentary privilege extends to public law
13 proceedings, in which there is, of course, no
14 determination of civil or criminal liability and in
15 which *Pepper v Hart* and *Wilson v First County Trust*
16 *Limited* represent exceptions to the Parliamentary
17 privilege rule.

18 Then, lastly, my learned friend refers to the
19 *Chilcot Inquiry*. That was, of course, a non-statutory
20 inquiry, for the precise reason that it should be
21 enabled to examine proceedings in Parliament.

22 So, my Lady, provisionally, we respectfully
23 suggest that there is no real argument about the fact
24 that the privilege does apply to your Inquiry. However,
25 the submissions overstate the significance of the issue

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1 in the actual circumstances of your Inquiry.

2 The issue of Parliamentary privilege is very
3 unlikely to present a problem because, as the CTI note
4 sets out in detail, what we've done is we've sought
5 simply to replicate such statements or materials, the
6 reliance upon which might have breached Parliamentary
7 privilege, by way of formulating our Rule 9 request in
8 full knowledge of what we know the witnesses to have
9 already said or provided to Parliament, and we've also
10 sought on our own account and afresh the documents which
11 have been provided to select committees and the bodies
12 such as the National Audit Office.

13 So to a very large extent -- in fact,
14 completely -- we have covered the ground by way of our
15 own Rule 9 requests and our own seeking of and the
16 provision of relevant documentation.

17 As for the opinions and reports from the select
18 committees themselves, they are covered by Parliamentary
19 privilege if, in principle, the privilege attaches to
20 your Inquiry, but they have little utility in the
21 general scheme of things because of the obvious feature
22 that it is for you to examine the evidence and to reach
23 your own conclusions. Therefore, the conclusions and
24 reports from select Parliamentary committees and the
25 National Audit Office may be of little assistance to you

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1 We anticipate receipt of the other draft reports
2 from Professor Whitworth, Dr Hammer, Professor Marmot,
3 who you will recall is the author of the seminal report
4 *Fair Society, Healthy Lives* in February 2010, Professor
5 Bambra, Bruce Mann and Professor David Alexander, and we
6 anticipate receiving those reports in March. Again, we
7 will need to review them before they can be provided to
8 the Core Participants but we're confident that we will
9 receive them by the end of March, so the picture is not
10 as grim as may have been painted.

11 If you do order Module 1 to start in early June,
12 there will be sufficient time for their proper
13 consideration.

14 Then there is the submission by Covid-19 Bereaved
15 Families for Justice and Northern Ireland Bereaved
16 Families for Justice that experts be appointed to
17 examine the issue of structural racism and
18 discrimination as part of Module 1. My Lady, I have
19 very considerable reservations about the wisdom of this
20 proposal for a number of reasons.

21 Firstly, the Inquiry is already looking intensely
22 at the way in which protected characteristics were or
23 were not probably safeguarded in the particular context
24 of each module but most particularly Module 1, for
25 present purposes. Protected characteristics include, of

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1 as part of that process, although of course I repeat
2 there will be multiple references to such material as
3 part of the historical context underpinning Module 1.

4 We venture to suggest that our approach is the
5 right one. It's been described pleasingly as a sensible
6 one by Scottish Covid Bereaved, and so we don't at this
7 stage, at any rate, the issue presents a practical
8 problem.

9 May I therefore invite you to consider that the
10 issue requires no resolution or ruling now but,
11 naturally, you will keep the matter under review. If we
12 do encounter material that is deemed relevant, and which
13 we're unable to introduce into the Inquiry by way of
14 replicating the oral evidence or statement or resourcing
15 the document, then we will bring the issue back to you,
16 at which point there may be -- only may be --
17 a requirement to resolve the point of principle.

18 Turning to expert evidence, the Core Participants
19 refer to the receipt of Professor Heymann's draft
20 report. He, my Lady, as you know, is the expert
21 instructed to deal with the issues of epidemiology and
22 virology. We have received his draft report. We are in
23 the process of reviewing it and we anticipate being able
24 to provide it to the Core Participants in the next ten
25 days.

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1 course, race so the foundational basis of any finding of
2 structural racism is already part of the Inquiry's remit
3 and, therefore, on its face, does not require further
4 evidence or expert evidence to be pursued and obtained
5 specifically on the issue of whether or not, as
6 a conclusion, there was structural racism.

7 In practice, it means there will already be, and
8 you have ordered that there be consideration of the
9 extent to which the Government and the various bodies
10 did take into account the position and the needs of
11 minority groups and other vulnerable groups and those
12 suffering from inequalities when making civil emergency
13 plans, and race, as I've already indicated, is
14 a necessary part of that examination and is referred to,
15 we anticipate, in Professor Marmot's draft report.

16 Next, structural racism is a conclusion, in
17 effect, to the effect that public policies,
18 institutional practices, cultural representations have
19 been seen to be worked in a way which perpetuated racial
20 group inequality. But Module 1 is not looking at and
21 could not possibly look at all policies and all
22 institutions and all institutional practices and all
23 cultural representations across all the Government
24 departments and the local authorities involved in the
25 United Kingdom and devolved administrations emergency

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1 preparedness. The bodies and institutions which are
2 part of the examination of Module 1 are not a unitary
3 body, for example, a police force. They are the whole
4 breadth of Government. So the search for the necessary
5 indicia of structural racism would be an impossible task
6 for Module 1.

7 Module 1, in connection with inequalities, is
8 looking at the extent to which, by contrast, relevant
9 bodies failed to have proper regard to the needs of
10 minority groups and those suffering from inequality, not
11 whether there was structural racism on the part of some
12 or all of those bodies. So we would respectfully
13 suggest that the issue which underpins the submission,
14 namely the extent to which Government practices and
15 decision-making was affected by a proper consideration
16 of the needs of individuals, minorities and sectors is
17 properly addressed by the way in which Module 1 is going
18 about its task and later modules of course, as you know,
19 will, in fact, directly be examining the issue of
20 inequalities.

21 So for all those reasons, we would invite you not
22 to pursue or to go down the route advocated by that
23 particular Core Participant, which is to order the
24 instruction of expert evidence covering the issue of
25 structural racism.

25

1 Participants have been given a list of topics in
2 addition, upon which each expert is being invited to
3 provide their opinion.

4 Turning then to the issue of the evidence proposal
5 procedure and Rule 10, we note the submissions advanced
6 by Covid-19 Bereaved Families for Justice and Northern
7 Ireland Covid-19 Bereaved Families for Justice. May
8 I emphasise that, contrary to their reading of the CTI
9 note, there is no suggestion at all that they will not
10 be permitted to ask questions under Rule 10. The note
11 merely stated what is obvious, which is that Core
12 Participants have no right to ask questions. They
13 require your permission. But, obviously, counsel to the
14 Inquiry does not require analogous permission.

15 The Scottish Covid Bereaved and Covid-19 Bereaved
16 Families for Justice Cymru invite the Inquiry team to
17 consider instituting an additional process whereby Core
18 Participants may be permitted to meet counsel to the
19 Inquiry after they have submitted their proposals on the
20 CTI evidence, lines of questioning proposals, so that
21 they have an opportunity to better explain to us the
22 rationale underpinning their observations. In effect,
23 what is sought is a further informal route by which they
24 can return to the fray and seek to persuade CTI that
25 there are areas and issues of such centrality that they

27

1 A further point raised by Covid-19 Bereaved
2 Families for Justice and Northern Ireland Covid-19
3 Bereaved Families for Justice is the request that
4 letters of instructions to the experts be disclosed now
5 because they fear that they won't, at least under the
6 process as originally envisaged, receive the draft
7 reports in time to be able to contribute meaningfully to
8 the process of identifying additional areas which will
9 require to be reported upon.

10 In my submission, providing letters of instruction
11 now is neither necessary nor sufficient. It's not
12 necessary because if you do decide that the commencement
13 of the public hearing will be put back there will be
14 time enough in late March, in advance of the process of
15 inviting the Core Participants to contribute to the
16 witness evidence proposals, for them to receive and
17 consider the draft expert reports. But it's also not
18 sufficient, my Lady, because the letters of instruction
19 provide only the framework for the expert reports
20 themselves and they say nothing about what the ultimate
21 opinion may amount to. The Core Participants need the
22 draft reports in order to be able to understand what is
23 being opined upon and that is, of course, what we will
24 be providing in due course.

25 I should say also that, as you know, the Core
26

1 must be raised in the course of the prospective
2 witnesses' evidence. It's a second opportunity, my
3 Lady, to bend our ears.

4 You may consider it's a sensible proposal because
5 it is far better that issues which may become red lines
6 for the Core Participants are raised with us and
7 thrashed out in advance of the witness giving evidence,
8 rather than being raised *ex post facto* and requiring
9 further time and energy to be devoted to such Rule 10(4)
10 applications as may then be made. So may we then give
11 thought as to the mechanics of how this might work in
12 practice.

13 The TUC reserves its position on this issue but
14 I need again to emphasise that all Core Participants
15 will be entitled naturally to make applications under
16 Rule 10(4) for permission to ask questions of a witness.

17 Turning to the Scottish Inquiry, the Scottish
18 Covid Bereaved and NHS National Services Scotland both
19 raised the issue of the Scottish Inquiry and the
20 absolutely proper need to avoid duplication. My Lady,
21 both Inquiries are committed to minimising duplication
22 in respect of investigation, evidence gathering and
23 reporting, as is set out, indeed, in their respective
24 Terms of Reference.

25 You have met, of course, your counterpart at the
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28

1 Scottish Inquiry and you will be continuing to do so and
2 the Inquiry teams are close to agreeing and publishing
3 memoranda of understanding. That will set out in terms
4 how both Inquiries intend to minimise duplication
5 because it will set out a framework for how they work
6 together, how the secretariats and legal teams will meet
7 and, specifically, how they will co-ordinate matters
8 such as hearing scheduling, requests from material
9 providers, disclosure and the calling of witnesses.

10 Also, because each Inquiry has its own Listening
11 Exercise, both Inquiries have been working together to
12 minimise confusion for the public, when sharing their
13 experiences with the Inquiries, and the secretariats
14 from both Inquiries are currently exploring the extent
15 to which such experiences, which may be shared with each
16 Inquiry, can be shared with the other and the obvious
17 value to each other's investigations and being able to
18 supply that information to the other Inquiry. So the
19 matter is well in hand.

20 In relation to the Listening Exercise -- Every
21 Story Matters, most of the Core Participants, my Lady,
22 have restated their commitment to continue working with
23 the Inquiry team to assist in its development.

24 The Covid-19 Bereaved Families for Justice
25 Northern Ireland Covid-19 Bereaved Families for Justice
29

1 importantly, the vital information which is that each
2 and every person will be enabled to share their
3 experience with the Inquiry through a web form or phone
4 line assistance or on paper, also through community
5 listening events and approaches, targeted approaches,
6 which will be made in due course to be able to open up
7 the line of communication with seldom heard groups and
8 the digitally marginalised. All that will be supported
9 by a very extensive media and communications campaign.

10 So a great deal of resource and time and energy
11 has already gone into setting up this very extensive
12 structure. More information will be provided in the
13 coming weeks, including by way of a webinar.

14 Then, finally, in relation to the substantive
15 topics, commemoration. Again, this is addressed in
16 detail in annex F to the CTI note of 30 January.
17 A series of meetings are in the process of being
18 scheduled with the leads for the Bereaved Families for
19 Justice groups and I think they anticipate meetings next
20 week or very shortly thereafter to ask for their support
21 in finding people who would be willing either to be
22 filmed for the videos which, will form an integral part
23 of the commemoration process, or to speak with artists
24 to help the Inquiry team to shape the tapestry of which
25 the annex talks.

1 group have expressed a certain lack of understanding of
2 and confusion in relation to what the Listening Exercise
3 or Every Story Matters exercise amounts to, so may
4 I repeat that the Every Story Matters exercise is
5 an essential part of your Inquiry. It supports the aims
6 of your Inquiry because it is designed to, and will,
7 gather individual experiences of the pandemic. It will
8 analyse those experiences and the way in which, of
9 course, they have been received to ensure that the
10 conclusions are methodologically robust and then it will
11 provide a set of comprehensive reports to the Inquiry's
12 legal process, so that they may be admitted into
13 evidence and of course it will be disclosed to the Core
14 Participants.

15 So this will assist you to obtain an even wider
16 evidence base, not just about the human impact of the
17 pandemic but also enabling you to reach robust findings
18 and recommendations.

19 Attached to the counsel to the Inquiry note of
20 30 January was an annex, Annex F, and it contains
21 a considerable amount of detail, including the extent of
22 consultation with the Core Participants themselves,
23 amongst others, the professional assistance being
24 provided on a piloted basis in relation to research and
25 analysis, communications, community engagement and, most
30

1 Separately, my Lady, I believe that many of the
2 Core Participants and members of the public have helped
3 the Inquiry already with the issue of the commemorative
4 art for the hearing centre room and we're, of course,
5 very grateful to them for their assistance.

6 My Lady, in summary, that matter and that
7 important part of your Inquiry proceeds like the rest of
8 it at pace.

9 The only other matters which I would like to raise
10 with you are less substantive and more administrative.
11 May we please have your permission to publish the Core
12 Participants submissions and the CTI note. At the
13 moment, of course, they are available to the Inquiry but
14 they haven't been publicly disclosed. In relation to
15 the forthcoming hearings and the public hearing in
16 Module 1, may I say that the public hearing in early
17 June, if that is when you order it to take place, will
18 be held at Dorland House, Paddington, W2.

19 Lastly, some of the Core Participants have
20 sensibly suggested that there be a further preliminary
21 hearing. We do have this in mind. If you order that
22 one be held, further details will be provided, of
23 course, in due course but there is the possibility,
24 subject to your ruling and the availability of the
25 various moving parts, to have a preliminary hearing at
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1 the end of March, around the 28th. If there is one, it
2 will be online as with the current preliminary hearing.

3 My Lady, those are all the matters that I wish to
4 raise with you by way of what I am afraid has become
5 rather a lengthy opening, but I believe that they
6 address all the matters which have been raised in the
7 very helpful submissions that we have received from the
8 Core Participants.

9 **LADY HALLETT:** Thank you very much indeed, Mr Keith. I have
10 been asked to take regular breaks for the benefit of the
11 stenographer, who copes extraordinarily well with
12 recording our words. It's probably best, rather than
13 interrupting Mr Weatherby's submissions, if we break
14 now. So I think we will break now. It's 11.25 by my
15 watch or thereabouts and we will return at 11.40.

16 **MR KEITH:** Thank you, my Lady.

17 (11.27 am)

18 (A short break)

19 (11.41 am)

20 **LADY HALLETT:** Mr Weatherby.

21 **MR WEATHERBY:** Good morning. Can you hear me okay?

22 **LADY HALLETT:** I can, thank you, Mr Weatherby.

23 **Submissions by MR WEATHERBY, KC**

24 **MR WEATHERBY:** You will have seen from our written
25 submissions that we've raised a number of issues, some

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1 themselves addressed their own preparedness duties.

2 Now, of course, Mr Keith has given some helpful
3 additional information about those matters. For my
4 part, it would be very helpful if we could have a list
5 of issues which expressly sets out the extent to which
6 and how the Inquiry is going to look at the issues --
7 the devolved matters, both from the perspective of the
8 UK Government and institution side but also from the
9 three perspectives of the devolved administrations.

10 Given these are joint submissions, I have agreed
11 with Ms Campbell, King's Counsel, that she will deal
12 with the devolution issues generally for our two teams
13 and the Northern Ireland issues, in particular, of
14 course, so I will move on from that having made those
15 initial comments, if I may.

16 Can I address start date. Following our written
17 submissions, we were grateful for Mr Keith for giving us
18 notice what he was going to say today in terms of the
19 hearing dates and the delay that he's inviting you to
20 take with that respect. For the reasons we've set out
21 in the submissions, we agree. There is, in our
22 respectful submission, no alternative to that.

23 I am quite happy to put on record that we don't
24 doubt for a moment that the Inquiry team has worked hard
25 and diligently but the reality, as we hear today, is, as

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1 of them have familiar themes. I want to underline at
2 the outset, if I may, that the families campaigned very
3 hard for this Inquiry to be established. They are
4 unified by the imperative that everything must be done
5 to make it as effective as possible and, so far as is
6 possible, they want to play their full part.

7 In terms of the written submissions, as has been
8 noted, they are joint submissions with the Northern
9 Ireland team, with whom we're working very closely. The
10 UK group and the Northern Ireland group, we anticipate
11 the other family groups, the TUC and no doubt others
12 have been very concerned at the lack of clarity as to
13 how the Inquiry intends to deal with the devolved issues
14 in Module 1 or, indeed, how it could possibly fit within
15 the timetable as had been indicated.

16 Unlike Module 2, of course, there's no dedicated
17 sub-modules and, in our submission, respectfully, the
18 timetable appeared to be inadequate to deal with the UK
19 matters, never mind the devolved ones as well.

20 Just to indicate, as far as we look at it in high
21 level, those issues include how the UK Government and
22 institutions considered preparedness with respect to the
23 three devolved nations and jurisdictions and worked with
24 the devolved administrations and institutions to that
25 effect, but also how the devolved administrations

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1 Mr Keith has mentioned, that we have a total 719
2 exhibits and documents disclosed and precisely three
3 witness statements relating to Module 1. Mr Keith has
4 updated us in terms of the evidence requests; they have
5 gone up from 114 to 160 since the note was sent to us.
6 That's the Rule 9 requests, of course, and that number,
7 as we're given to understand, will rise still further
8 and, as, again, Mr Keith points out, the fruits of those
9 requests will obviously and necessarily inevitably lead
10 to further additional requests arising out of them.

11 Recently, as Mr Keith has indicated, very
12 significant evidence requests have gone out and, as
13 I understand it, are continuing to go out to individuals
14 rather than organisations and, therefore, the
15 evidence-gathering stage of Module 1 appears to be quite
16 far from completion and the disclosure, which I'll come
17 on to in a moment, is very much in the foothills.

18 We were indicated that we would have a witness
19 list in the week commencing 6 March. We were not clear
20 at all how it was ever thought that that could possibly
21 be done, given the outstanding matters of evidence
22 gathering. Of course, that's 20 days from now. If the
23 request to put the hearings back by a month is acceded
24 to, of course that will provide another month and that
25 will help but, in our submission, that will only

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1 properly help if the process is significant changed.
 2 I will come on to what I mean about that in a moment.
 3 On the timetable proposed, we would have been
 4 asked to provide submissions on the witness list within
 5 "a short period" and then for lines of questioning to be
 6 provided within about a month; so to commence from
 7 10 April.
 8 Given that we've only a small number of witness
 9 statements, that isn't the extent of the problem. We
 10 have, of course, the provisional scope document, the six
 11 paragraphs that's on the website, but no list of issues.
 12 I have already addressed that on the specific issues of
 13 the devolved matters already this morning. That lack of
 14 any flesh on the bones of the provisional scope does
 15 limit our understanding of what is and isn't going to be
 16 looked at within Module 1. We had been helpfully told
 17 that Professor Heymann's draft report had been received
 18 by the Inquiry. The Inquiry had anticipated to disclose
 19 it quite quickly and we're told we'll now receive in the
 20 due course. We're told that the other three expert
 21 reports will be received by the Inquiry only in early
 22 March. Again, we have a summary of their scope but we
 23 don't have the letters of instruction and, therefore,
 24 we're not clear about what to expect.
 25 We're told that on receiving the draft reports,

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1 possible, in our submission, should be done to engage
 2 with us, the Core Participants, to ensure that it can be
 3 effective at the new start date, and so that's why in
 4 our written submissions we respectfully asked that there
 5 be a change of approach and I repeat that now. If the
 6 Inquiry, the families, other CPs, can't be properly
 7 prepared by 2 May, why will the position be different at
 8 2 June or perhaps even some time thereafter?
 9 If we had now proper understanding of the evidence
 10 that had been requested, we'd be in a position now to
 11 raise where there were any perceived gaps, not having to
 12 wait a further period of a week or a month, three
 13 months, before disclosure is made of particular
 14 documents and statements and then having to look at
 15 matters now. If we had a list of issues, even if it's
 16 a running list of issues that is being amended as it
 17 goes along, more than the provisional scope, we'd be in
 18 a much better position to know the extent of where the
 19 Inquiry intends to draw the lines on Module 1.
 20 There had been discussion this morning not only
 21 about the devolved issues that I referred to but also
 22 about other issues of scope and what will be dealt with
 23 in terms of preparedness in Module 1 and what may be
 24 left to other modules. If we had the list of issues or
 25 a running list of issues now, then that would put us in

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1 the process thereafter will be disclosed to us but we
 2 understand that will give us a period of time to make
 3 submissions about what needs to be clarified, if
 4 anything, or indeed whether further issues arise. At
 5 that point, only then, will we be in a position, a real
 6 position, to know how much more work may need to be done
 7 by those experts or, indeed, whether there might be
 8 lacunae where we would be inviting you to instruct
 9 further experts.

10 We absolutely want the Inquiry to start at the
 11 earliest possible date but, on the current process,
 12 we're not sure that another month is realistic. It's
 13 much more likely to be realistic, in our submission, if
 14 the changes to the process are made which I will invite
 15 you to consider or perhaps reconsider now.

16 It's been suggested by Mr Keith that the reason
 17 for putting the start date back is to make sure that
 18 Core Participants, including the families, are enabled
 19 to be fully prepared and that, of course, is a laudable
 20 aspiration but we make two points. Firstly, of course,
 21 the proposed delay is not due to any inaction on our
 22 part but that doesn't really matter. The cause or the
 23 reason for such delay is not our main concern: getting
 24 the Inquiry right is.

25 Secondly, if the hearings are put back, everything

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1 a position to have proper dialogue with your team to
 2 work out how best to progress now and not in a week or
 3 a month or three months' time.

4 Again, going back to the issue of experts,
 5 Mr Keith indicates that having letters of instruction
 6 for the experts is neither necessary nor sufficient.
 7 Well, I can agree with him on half of that. I would
 8 agree with him it's not sufficient but it would be very
 9 helpful indeed to us to have the letters of instructions
 10 because we would be able to identify now gaps in what
 11 had been asked of the experts and, again, not next week
 12 when we might get Professor Heymann's report or in
 13 a month or a month and a half's time when we might get
 14 the other reports.

15 So that would provide extra time for us, in
 16 dialogue with the Inquiry team, to assist you in
 17 preparing to make sure that the extra time which we
 18 anticipate that you may allow for preparation here will
 19 not lead to yet a further delay when we get to that
 20 point.

21 I know these are recurrent themes. I don't want
 22 to tax your patience but the disclosure of Rule 9s,
 23 letters of instruction to experts, a running list of
 24 issues now, would be likely to greatly assist all Core
 25 Participants in helping the Inquiry. It would also send

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1 the clearest of messages that the Inquiry welcomes the
2 assistance of all Core Participants.

3 Specifically on the issue of Rule 9, we've made
4 a particular point about the WHO and the Coalition for
5 Epidemic Preparedness Innovations and the point about
6 that was that the Inquiry has entirely appropriately
7 instructed experts to look at the international
8 processes but it didn't appear to have sought factual
9 evidence of what preparedness there was from the
10 international perspective. I obviously heard what
11 Mr Keith says about the WHO, although perhaps I'm
12 allowed to be a little bit surprised at the WHO's
13 response to a request for such factual evidence, but
14 that would make it more important, in my submission, to
15 look for other international factual evidence about that
16 preparedness link internationally. We certainly would
17 repeat our submissions about the CEPI, that perhaps it
18 would be appropriate to look wider than that as well.

19 At paragraph 8 of our written submissions, we have
20 fully recognised, I hope, the practical issues for the
21 Inquiry team in terms of the disclosure process. We
22 obviously have a degree of experience in our team about
23 these matters. We fully understand that it's
24 a difficult process to undertake.

25 The Inquiry has indicated that it has 42 draft or
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1 or Article 2, and matters like that, but simply on the
2 basis that some of the witnesses named in the statements
3 and documents are junior staff.

4 We can well understand a submission that the
5 identity of junior staff who are not decision-makers may
6 be irrelevant or it may be disproportionate to put their
7 identity into the public domain, but we're struggling to
8 understand why this is an issue prior to disclosure onto
9 a secure platform only to those who signed the
10 undertaking.

11 If this is a real issue at all, in our view is one
12 which should arise at the later stage when a witness
13 list is drawn up and plans are made for producing
14 evidence. Two points arise from that, from our
15 perspective. Firstly, the note and Mr Keith's helpful
16 comments this morning. It's apparent that this issue,
17 this redaction of the names of junior staff, is taking
18 up a disproportionate and substantial amount of time of
19 his team and the knock-on effect is it is seriously is
20 impeding the disclosure of other material to Core
21 Participants.

22 Secondly, we're then being asked to play our part
23 in the process by informing the Inquiry if inappropriate
24 redactions are being made with the obvious difficulty
25 that we don't know what we cannot see and, with respect
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1 finalised statements. Obviously, it is processing them
2 and they will be disclosed at some dates, plural, in the
3 near future, we hope.

4 Objectively, we are late in the process for such
5 a small number of witness statements to have been
6 received by the Inquiry, never mind disclosed to us, and
7 plainly the Inquiry is awaiting many, many more
8 statements and documentation and, as I've already noted
9 and Mr Keith has noted, it's still sending out
10 evidence-gathering requests. So there is a considerable
11 distance to go before the Inquiry has gathered the
12 material, never mind has undertaken the disclosure
13 process.

14 There will obviously be disclosure filtering
15 through late in the process. That's always the case but
16 it would be helpful to know what date the Inquiry team
17 is focusing on where it will be able to say that it's
18 completed the bulk of Module 1 disclosure and it would
19 be helpful if the Inquiry team could give that some
20 consideration.

21 One particular factor I want to address that
22 Mr Keith has raised, both in writing and this morning,
23 that has slowed the disclosure process, is the redaction
24 of witness names. As he has made clear, this isn't on
25 the basis of issues, for example, of national security
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1 to this issue of the redaction of names in particular,
2 then we say that's the wrong way around and those
3 seeking the redactions should be those that should make
4 the running on that matter.

5 The solution with respect to this, is that where
6 the only basis for redacting names is the junior status
7 of the person, disclosure should be made without such
8 consideration and then when the plans for adducing the
9 evidence are made, then it can be seen which individuals
10 are actually involved in that and the parent
11 organisation can provide a list of persons to be
12 redacted with the rationale for so doing. That's likely
13 to result in much shorter lists. We can see what is
14 happening and, so far as I can see at moment, we may
15 well have little objection if departments take
16 a sensible approach.

17 I'm unaware of any other inquiry where the
18 approach taken here has been adopted. I stand to be
19 corrected on that but I'm not aware of this redaction of
20 junior staffs' name having occurred in other processes
21 which I have actually worked within. I think it was
22 an issue that was raised in the recent Partygate review
23 but that was a different context and, again, so far as
24 I'm aware, related to publication rather than disclosure
25 to restricted persons with an undertaking.
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1 Finally, with respect to disclosure matters, I'm
2 asked to raise the issue of the IT platform. In fact,
3 this was an issue we raised before any platform was
4 procured by the Inquiry and I note that other Core
5 Participants are raising this, this morning. The
6 platform which is being used has limited functionality.
7 I think that the companies, plural, involved would balk
8 that idea that it's the industry standard. What
9 functionality Relativity has is, in fact, restricted and
10 my team has already tried, but unsuccessfully, to
11 persuade the Inquiry team to allow Epiq to give us some
12 more functionality, which is available at very limited
13 cost, we're given to understand, which would at least
14 ease the process from our perspective.

15 It is slowing our ability, hampering our ability,
16 to deal with the disclosure as it comes in and that will
17 be exacerbated, given the apparent rapid increase in the
18 disclosure to be made. Members of your team have worked
19 with the other platform that's being mooted. We're not
20 asking you to jump ship onto another platform. The last
21 major Inquiry I was instructed in, in fact, had both
22 Relativity and Opus used by the Inquiry team as well as
23 the CP teams. It's a system with greater functionality
24 which is being used in a number of other major inquiries
25 and major inquests and we believe, overall, it would

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1 In our submission, that's unlikely to be correct
2 and would lead to a very unsatisfactory result that you
3 would have to ignore the difference between what the
4 witness said in the Inquiry and under privilege, whilst
5 there would be no problem, for example, with The Times
6 or the Daily Mail reporting from the gallery about the
7 inconsistency and there were the potentially unreliable
8 nature of that evidence.

9 From the discussion by Mr Keith this morning, he
10 has raised a number of no doubt important points,
11 further to his propositions in the note and our response
12 in our written submissions. There are a number of
13 points that he's raised, which we would most certainly
14 have an answer to. For example, the 1999 Parliamentary
15 Committee considered whether, in fact, to enact
16 a statutory application of Parliamentary privilege
17 within the Inquiries Act proposed legislation and didn't
18 do so. That could play either way in the discussion.

19 The fact that the Chilcot Inquiry apparently did
20 consider matters under Parliamentary privilege would
21 potentially indicate that an inquiry can look beyond the
22 privilege because Parliamentary privilege can't be
23 waived. So the fact that it was a non-statutory inquiry
24 is unlikely to make a difference. The public law point
25 that Mr Keith made, the point about public law, is it

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1 have a significant cost saving because the greater the
2 functionality the easier and the more quickly the
3 disclosure can be dealt with.

4 We would ask that that issue is revisited.

5 In terms of Parliamentary privilege, this is an
6 issue that was raised by Mr Keith in his note and
7 a series of propositions have been made. Many of them
8 we unreservedly say are right and we did do -- we set
9 that out in writing, but some of them, we say, go too
10 far and we agree with Mr Keith that the approach that
11 he's indicated, in terms of the taking of witness
12 statements, taking account of Parliamentary privilege,
13 is a helpful one. For example, in paragraph 27(a) of
14 his note, it's proposed that where a witness has said
15 something relevant in Parliament covered by
16 Parliamentary privilege, the Inquiry will seek a witness
17 statement covering the same material and that would then
18 obviously not be subject to Parliamentary privilege.
19 That, we say, is a sensible approach to take.

20 However, we do illustrate the problem through that
21 same paragraph. If the witness is asked to do that and
22 gave a different answer to that, which he or she had
23 given within Parliamentary privilege, would the Inquiry
24 then have to ignore the discrepancy? On CTI's note, it
25 would appear that that would be so.

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1 may not determine generally -- although occasionally it
2 does -- liability but it is still litigation, in the way
3 that a public inquiry isn't.

4 So although no doubt those are important points
5 that need to be looked at, it probably illustrates the
6 need to actually look at them in a more organised way
7 from each side through written arguments and therefore
8 I think my submission is that we would persist with our
9 point that any Core Participant that would wish to
10 support the propositions, the extent of the
11 propositions, should be invited to reduce those to
12 writing with the supporting law. Then we would be in
13 a position to give a full and proper response in the
14 traditional way with a skeleton argument in reply.

15 Whether that is something that needs to be done
16 immediately, I'm not as sure but it does appear from the
17 discussion that's occurred this morning that there are
18 real issues here and ones that are likely to arise and,
19 therefore, I respectfully ask that it should be
20 timetabled so that it can be argued at some point.

21 In terms of experts, we reiterate the points
22 already made regarding timetabling and our ability to
23 assist the Inquiry now rather than later. With respect
24 to the specific issues of structural discrimination,
25 this is an issue, a big issue, with the families. The

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1 issue we have is that there is a body of evidence and
2 a widespread concern about the disproportionate effect
3 on the pandemic on certain communities, particularly
4 black and brown ethnic communities, and the question
5 arises: were known issues, structural issues, structural
6 discrimination issues, properly and sufficiently
7 addressed in preparedness for a pandemic or not?

8 Now, Mr Keith makes the point that there is a wide
9 breadth to this sort of issue. That's precisely why we
10 say that it can't sensibly be dealt with within
11 a general drawing together of health inequality experts
12 and why it needs to be addressed in a dedicated and more
13 specific fashion.

14 The structural issues -- we've set some out in the
15 written submissions, so I won't repeat those -- that
16 these are matters of enormous concern, they do very,
17 very much start with preparedness and, therefore,
18 although no doubt they will be issues that will be
19 raised with a number of modules, if not all modules, in
20 our respectful submission they are ones that will not
21 wait until later and it is a major and complicated issue
22 which requires dedicated experts' attention and we would
23 respectfully ask you to look again at that and look to
24 instructing experts that will deal with it not simply as
25 part of the health inequalities expert evidence.

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1 presumption in Rule 10 must be that there's
2 a presumption that all relevant questions are asked,
3 whether by counsel to the Inquiry or indeed by others.

4 In terms of witnesses and the timetabling, I've
5 already addressed some of these matters but I want to
6 add three points. Firstly, so far, there's been no
7 mention of selecting family members with experiences
8 which may illustrate the systemic effect of preparedness
9 failures to give evidence within Module 1. We note, in
10 particular -- and no doubt Ms Campbell will refer to
11 it -- the material included in the Northern Ireland
12 group's Rule 9 response but I will leave that to
13 Ms Campbell, if I may.

14 Picking up, if I may, my earlier submissions on
15 structural discrimination as an example, it's our
16 understanding that there were no measures to risk assess
17 frontline healthcare workers which included
18 an assessment of the likely disproportionate effect on
19 people from particular ethnic backgrounds, and another
20 might be the effect of a failure to have advance
21 planning for the necessity to isolate patients coming
22 into care homes or to address the obviously foreseeable
23 problem of Covid being brought from care home to care
24 home by agency workers.

25 These are matters of which family members may well

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1 May I make a point on that, that I'm in no way
2 impugning the expertise of Professors Marmot and Bamba,
3 and I am aware that some of their work more generally
4 does include issues of racial inequalities, so I'm not
5 in any way trying to impugn their work. We're simply
6 making the submission that these are issues that need to
7 be looked at in detail on their own.

8 In terms of evidence proposals and Rule 10, the
9 CTI note implied to us that the limited time set aside
10 for Module 1 was being determinative of the question of
11 witnesses and the questioning of witnesses. I am
12 greatly reassured by the comments of Mr Keith this
13 morning and we will revisit that in detail. We will
14 obviously be aware of the imperative of the Inquiry
15 being dealt with efficiently, but we will be persisting
16 with our submissions that having more voices in the room
17 on a proportionate and no doubt time-limited fashion is
18 a matter which not only enhances the ability of the
19 Inquiry to look at witnesses but it also draws in the
20 Core Participants in a collaborative fashion to make the
21 Inquiry work more effectively and, therefore, we will be
22 making those submissions further. But we are reassured
23 by the comments made by Mr Keith.

24 We note the use of the word "presumption" and we
25 repeat what we said in writing that the only real

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1 have important direct evidence. Of course, it may be
2 evidence that relates to later modules as well but we
3 would invite you to ask the team to discuss the calling
4 of a proportionate number of family members within
5 Module 1 to address relevant issues.

6 The second issue is we've liaised with the TUC
7 legal team and we support their submission that
8 a witness should be called to deal with the relevance
9 and impact of austerity on preparedness.

10 The third point is that we ask you to review what
11 we have submitted is a considerably inadequate time
12 estimate for Module 1 but, again, we have been reassured
13 to some extent by the helpful comments of Mr Keith this
14 morning that, indeed, he is inviting you to look at that
15 as well.

16 May I add a caveat to that? From the outset,
17 we've asked you to have the timescale of the whole
18 Inquiry clearly in mind. We're not inviting you to
19 conduct the Inquiry without a clear eye on expedition or
20 letting it get out of hand. However, we do say that
21 preparedness should be a substantial part of the overall
22 Inquiry. It constituted something like a half of the
23 draft Terms of Reference that we submitted on behalf of
24 the families at the outset. How prepared the UK in its
25 constituent parts was for a pandemic is a necessary

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1 precursor to examining the other side of the coin: how
2 appropriate were the responses? It's essential that
3 preparedness is looked at comprehensively, given that is
4 where your recommendations are likely to be focused,
5 preparing to prevent or mitigate the next time around.

6 A snapshot or a superficial approach certainly
7 will not do with respect to preparedness. So we would
8 invite you to quite considerably increase the timetable
9 or the timetabling for Module 1.

10 In terms of opening and closing statements, we
11 note the comments made by CTI. We have no issue with
12 case management and time limits. We just ask that they
13 are subject of discussion rather than announcement, so
14 that we can have some input into those matters.

15 Can I address the Listening Exercise or the Every
16 Story Matters points. We've made quite a number of
17 submissions about this subject. It is a subject which
18 is of very obvious and clear concern to the families and
19 we have two real points to make. As Mr Keith indicated,
20 we have noted in our written submissions that there
21 remains considerable uncertainty, confusion even,
22 regarding this exercise. The latest update tells us the
23 Inquiry has worked with Ipsos and M&C Saatchi to
24 progress the design of the project but it doesn't
25 explain what that design is.

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1 families, and extremely important if it works, and what
2 is needed is clarity and certainty, and we submit that
3 the project should be reduced to writing, to a clear
4 plan setting out exactly how the process will operate
5 and how families and others will be asked to engage with
6 it. It should set out who will be doing what, their
7 training and experience requirements and the timescale.
8 The sweeping statements in the updates, no doubt well
9 meant, but they are not fully informative.

10 The second point I want to raise about the project
11 is the continuing anxiety regarding the companies
12 involved and there is reference in the update attached
13 to the CTI note to seeking assurances from any potential
14 supplier that they declare conflicts of interest and how
15 they can avoid conflicts of interest if they arise. It
16 is well known that these are matters of acute concern to
17 families and only last week there was further media
18 reporting of companies said to be involved, and the
19 families seek more reassurance than that those bidding
20 for this work will give assurances that there are no
21 conflicts of interest.

22 I give one example: the openDemocracy website last
23 week cited the two companies that they say have been
24 contracted to the Inquiry and they say that the Inquiry
25 has confirmed that, Saatchi and a company called 23red

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1 It asserts that the Inquiry's looking to procure
2 "several new contracts" to deliver the next phase but it
3 doesn't explain what the next phase is. We're told it's
4 likely to include "research and analytics communications
5 and community engagement suppliers". We're not told
6 what experience or expertise is to be required of those
7 suppliers.

8 We're told that the Every Story Matters project
9 aims to offer an open and inclusive way for people to
10 share their experience and that the Inquiry is looking
11 for different ways for people to share their story, but
12 the latest update appears to be largely aspirational:
13 what they are looking to do at some point in the future.
14 What the families need, with respect, is a little bit of
15 concrete and they need to know exactly what the plan is,
16 how they are to access it, what the support to them will
17 be, who precisely will interact with them, what will be
18 the experience and training of those persons, what does
19 the Inquiry mean by "trained researchers", what
20 experience will the research companies have, how will
21 they be quality controlled, how will the Inquiry ensure
22 that "conclusions are methodically robust"?

23 This is a project which has been in the making for
24 many, many months already. It's an exercise which will,
25 of its nature, be extremely difficult for bereaved

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1 and the openDemocracy website asserts that both of those
2 companies had contracts to work on the Government Covid
3 response, as well as other Government work.

4 Another website asserts that 23red actually worked
5 from the Cabinet Office on that work. I'm not
6 commenting on whether those accounts are correct or
7 indeed whether there's an actual conflict of interest.
8 But there is considerable unease about this and what we
9 seek is a clear indication from the Inquiry as to it
10 using companies which have undertaken what might
11 reasonably be perceived to be a conflict of interest and
12 indeed for companies contracted to do inquiry work to
13 make a public statement concerning any work they have
14 done that could be perceived to be in conflict.

15 The consequences of not taking a robust and
16 transparent approach to these issues are really quite
17 simple: less families will be prepared to engage and the
18 whole exercise will have less utility and less
19 credibility.

20 Finally, in respect of commemorations, I'm not
21 going to repeat any of our previous submissions on this
22 subject. You have heard them already, probably once too
23 many, but we do note the current intention to develop
24 video content to be played at the commencement of
25 Module 1. We're ready to help, we're ready and willing

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1 to engage about this, if we're informed clearly of what
2 that plan is. The update asserts that the Covid
3 Bereaved Families for Justice has been asked to assist.
4 We're a little confused by this. There was
5 a consultation meeting in November but we're unaware as
6 to any further contact about that particular part of it.

7 That's no matter. It can be rectified. We ask
8 that it is. Subject to what the plan is, the families
9 want to engage and assist with those parts of the
10 process.

11 Unless I can assist further, those are the
12 submissions I wanted to make this morning.

13 **LADY HALLETT:** Thank you very much, Mr Weatherby. I'm very
14 grateful obviously to you and to those whom you
15 represent. As you acknowledge, it's a difficult
16 balancing exercise to draw between timeliness and
17 effectiveness but I do understand your concerns and
18 I undertake to consider very carefully the submissions
19 that you have advanced today and in writing. Thank you
20 very much.

21 **MR WEATHERBY:** Thank you.

22 **LADY HALLETT:** Next I think we have Ms Campbell, King's
23 Counsel.

24 **Submissions by MS CAMPBELL, KC**

25 **MS CAMPBELL:** Thank you, my Lady.

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1 issues such as the disclosure management platform and,
2 indeed, the listening project that Mr Weatherby has just
3 addressed we very much adopt wholeheartedly both in
4 written form and the oral submissions that my Lady has
5 heard this morning and they won't, as it were, benefit
6 from repetition.

7 My Lady, as with the UK Covid Bereaved Families
8 for Justice, the group whom I represent, together with
9 others in Northern Ireland, has long campaigned for
10 a full and frank public inquiry into the UK Government,
11 the Northern Ireland Executive and public authorities'
12 handling of the pandemic, with a significant focus on
13 preparedness and decision-making and funding at all
14 levels during the pandemic. I can reassure you, my
15 Lady, that the Northern Ireland families remain
16 steadfast in that aim and in that ambition and remain
17 willing to assist the Inquiry to the greatest extent
18 possible.

19 The Northern Ireland families represent a very
20 broad demographic of Northern Irish society, by its very
21 nature, those being individuals and families who have
22 come together, united really by bereavement. The
23 existence of this group, of course, postdates the onset
24 of the pandemic but that's not to say that their
25 experience postdates the onset of the pandemic

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1 My Lady, by way of preliminary observations,
2 I wish to address you briefly on the group whom
3 I represent and the unique situation in Northern
4 Ireland, in brief terms.

5 **LADY HALLETT:** Just before you do Ms Campbell, I'm sorry to
6 interrupt, I don't know if you intended to be seen on
7 screen but I can't see you.

8 **MS CAMPBELL:** Oh. Well, if it helps, I can see myself,
9 which I can tell you it doesn't, but I can certainly see
10 that my camera is working.

11 **LADY HALLETT:** I've got you.

12 **MS CAMPBELL:** Sometimes it helps just to toggle a little bit
13 longer. Thank you, my Lady.

14 I was opening to indicate that my observations
15 will address in brief terms the nature of the group whom
16 I represent and the unique situation that prevails and
17 that prevailed in the North of Ireland. I'm not going
18 to address every single item on the agenda and, to the
19 extent that I do not, it doesn't mean that items have
20 been overlooked or that issues or concerns are not
21 shared with those that my Lady has just heard from
22 Mr Weatherby, King's Counsel, or indeed that there are
23 no submissions to be made.

24 For the purposes of this hearing, when it comes to
25 issues such as Parliamentary privilege, when it comes to

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1 exclusively. The activism of the Northern Irish
2 families was directed at key decision-makers in the
3 North of Ireland and indeed beyond from a very early
4 stage of the pandemic, in the hope that deaths could be
5 avoided, in the hope that lessons could be learned as
6 soon as possible to prevent other families from
7 suffering as they did.

8 So a great many of our members engaged actively
9 with decision-makers from the outset. Those included:
10 senior officials in the Department of Health; arm's
11 length bodies; the public health agencies; RQIA, the
12 Regulation and Quality Improvement Agency; and, indeed,
13 senior politicians, both locally and in Westminster, the
14 Office of the First Minister, the Deputy First Minister
15 and the devolved ministers.

16 So the point that we make is that it should not be
17 assumed, and I don't say that it is, but it should not
18 be assumed that because our group came in to being after
19 the onset of the pandemic, it cannot assist with issues
20 around preparedness. Of course it can. The members of
21 the group collectively, and some individually, have
22 a great deal of in-depth knowledge and experience of how
23 the complex Northern Irish health and social care
24 systems operate, which of course are distinct from
25 Westminster, and continue to operate in practice, and

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1 that knowledge has been acquired both prior to and
2 indeed during and since the pandemic.

3 Of course, it's striking that a very significant
4 proportion of the Northern Irish families are made up of
5 bereaved families who represent some of the most
6 vulnerable in our society, including those who were
7 elderly or those who are already in poor health or who
8 were reliant on care assistants or who were requiring
9 other essential healthcare interventions. So those whom
10 we represent really were the voices of the deceased long
11 before the pandemic struck and continue to have a great
12 deal to say about the circumstances that prevailed at
13 the time that the pandemic struck and indeed beyond.

14 So, my Lady will have received in recent weeks
15 a detailed Rule 9 response that has been prepared by our
16 group leads on behalf of the wider group. The aim and
17 the hope of that Rule 9 is to set out in some detail how
18 it is that Northern Ireland is different but also to
19 remind the Inquiry and to remind your team, my Lady,
20 that our family members have a significant amount to
21 offer to this particular module, and the point that
22 Mr Weatherby has made on our behalf, and indeed on
23 behalf of the wider group, that the Inquiry should be
24 looking to family members to see whether witnesses are
25 available from within our group to assist and to put

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1 on the civil contingency planning and the difficult, if
2 I may say so, political environment in which our
3 devolved institutions operate and, secondly, as you have
4 heard at previous preliminary hearings, because the
5 island of Ireland geographically is a single
6 epidemiological unit.

7 It is also right to observe, as has been observed
8 this morning, that Northern Ireland, for a significant
9 period before the pandemic, was unique, certainly for
10 three years immediately prior to the pandemic, there was
11 a vacuum of governance with no functioning executive and
12 one concern of our members is that this has contributed
13 to a failure to legislate to plug the gaps in statutory
14 duties for civil contingency planning. Where entities,
15 where bodies have power but not duties to prepare for
16 and to respond to emergency situations, such as
17 a pandemic, then it would ordinarily fall to a minister
18 as being responsible for significant or controversial
19 decisions about how to exercise those powers. But where
20 there are no ministers, and no Assembly, there's a lack
21 of democratic oversight in relation to how decisions are
22 being taken and taken, in particular, for preparedness
23 and in due course for response.

24 So, my Lady, making these general supervisions is
25 really to remind the Inquiry that the lived experience

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1 into proper context issues about preparedness, is one
2 that is well made and that we certainly stand ready to
3 assist with.

4 My Lady, I have made the point that Northern
5 Ireland is unique and we very much believe that it is.
6 It's distinct, of course, from Scotland and Wales and
7 England geographically and politically. It's distinct
8 also as a result of the experiences of, and indeed the
9 engagement of, our civil society and, as such, the
10 preparation for this pandemic and indeed for future
11 pandemics can't be aligned easily or at least entirely
12 by experiences emanating, be it from Westminster or
13 Cardiff or Edinburgh. Emergency preparedness in the
14 North of Ireland is a devolved issue politically and
15 a demarcated issue geographically. Both should be
16 a matter of concern for this module.

17 It is reassuring, if I may say so, to hear
18 Mr Keith this morning indicating that those issues have
19 been heard. I make the point, and I don't make it
20 critically, but really that is the first occasion that
21 we have heard publicly that our voices are being heard.
22 But that issue of emergency preparedness being both
23 a devolved issue politically and indeed a demarcated
24 issue geographically is a matter first of concern.
25 Firstly, because of the lack of any devolved legislation

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1 of Northern Ireland families and our membership must be
2 considered because that lived experience within the
3 context of Northern Ireland provides critical
4 information and context for you in considering the
5 issues to be addressed in Module 1.

6 I make clear that our members stand ready to
7 applaud and to identify positive examples of
8 preparedness and to expose areas of concern and to
9 demonstrate where there were features of preparedness
10 for the pandemic that undermine any assertion or any
11 conclusion that there had been adequate planning or
12 effective participation to implement plans and
13 resilience in practice, and where there remains much to
14 learn.

15 The reality is that the Northern Irish families
16 are Core Participants in your Inquiry, my Lady, not only
17 because of the magnitude of their loss but also because
18 they represent an enormous repository of information, of
19 knowledge and of shared experience that is of value to
20 this Inquiry and, as a group, they have stood ready for
21 some considerable time to contribute, to respond and to
22 participate.

23 Really, we encourage the Inquiry, my Lady, through
24 your team, to seek to harvest that information from our
25 group, to seek to learn the knowledge and to share the

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1 experience in order to positively contribute to this
2 process, not only in the course of the hearings in
3 Module 1 but at this stage in the course of the
4 preparation for those hearings because, without the
5 voices of the Northern Irish families, this Inquiry when
6 it comes to considering the issues, both in Westminster
7 and in the devolved administration, we submit will be
8 significantly the poorer.

9 Yet whether Module 1 commences in ten weeks' time
10 or in 14 weeks' time depending on your decision today,
11 my Lady, there remains a lack of clarity from our
12 perspective about how and by what means preparedness in
13 Northern Ireland is really to be addressed in Module 1.
14 We are grateful for the insight that we have been given
15 in the course of this morning's hearing. We hope that
16 it represents the beginnings of clarity and further
17 discussions but, of course, when it comes to Northern
18 Ireland within Module 1, disclosure is in its infancy.
19 Witness statements are scant to non-existence and it's
20 not clear to what extent, if any, your experts will
21 report on Northern Ireland-specific issues directly.

22 We are told that we must wait until all those
23 reports and the witness statements have been received
24 and considered and that will be our opportunity to
25 contribute but, as Mr Weatherby has pointed out and with

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1 To know the detail of what has been requested
2 would also enable us to have proper consideration as to
3 whether further questions or further issues or further
4 follow ups ought to have been generated as a result of
5 what is in that particular document.

6 We note by way of example in the helpful
7 appendices to the CTI note, that there appear to have
8 been a different ambit or certainly a different extent
9 of consequences posed to the Scottish, Welsh and
10 Northern Irish Governments. We don't know why that is
11 and why it is that in relation to Northern Ireland the
12 questions posed or the topics that we have been given
13 are narrower than to the counterparts in Scotland and in
14 Wales. We can't meaningfully contribute to that
15 process, we would respectfully submit, unless we know
16 what has been asked, of whom and in what detail.

17 My Lady, as if to further illustrate that point,
18 we understand that our Rule 9 response, on behalf of our
19 group leads, has prompted or indeed is likely to prompt
20 further requests from other bodies. My learned friend,
21 Mr Keith referred to this morning the emergency
22 preparedness groups of Northern Ireland, who will now
23 receive Rule 9 requests and that's, of course, welcome
24 news. It is reassuring that the issues that we have
25 raised in our Rule 9 are being considered and indeed

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1 which we respectfully agree, allowing input only or
2 mainly on receipt of witness statements, on receipt of
3 expert reports, and when witness lists are being drawn
4 up, and then potentially only in a limited way, is
5 an approach which we respectfully submit is a flawed one
6 at this stage and that reflection ought to be given to
7 changing it.

8 May I address this by way of example through the
9 Rule 9 requests because we reiterate the call for
10 transparency and for clarity in that process and for
11 disclosure of the detail of what have been recognised to
12 be, this morning, both numerous and complex Rule 9
13 requests. But to know the detail of what has been
14 requested of a Government body or of an individual or of
15 an agency, particularly given that these are complex
16 requests, would enable our engagement in ensuring not
17 only that the correct requests have been made of the
18 correct agencies but also that the detail of those
19 requests is sufficient and to know the detail of what
20 has been requested would enable us to have a better
21 interpretation of the information that had been
22 provided. When you know what has been asked for and you
23 can compare that with what you have received, the
24 recipient is better placed to judge the quality of the
25 response and the fullness of the response.

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1 acted upon. But it's simultaneously, if I may say so,
2 concerning that such requests are being issued at this
3 juncture and that they are being issued without our
4 meaningful input, leaving limited time for receipt
5 before the hearings commence, be it in May or indeed in
6 early June.

7 So we would join with Mr Weatherby in asking you,
8 my Lady, and your team to engage further with us in this
9 process and to recognise the value that Core
10 Participants can bring to the preparation for the
11 hearings and not just to the hearings themselves being
12 part of the process and understanding the ambit of
13 requests. Shaping and contributing to those requests
14 would best ensure that you, my Lady, obtain the evidence
15 that is most beneficial to this Inquiry.

16 My Lady, linked to that is the issue of expert
17 witnesses and I can be relatively short, given the
18 information that we have received this morning. But we
19 observe again, as we've done in written submissions,
20 that there doesn't appear to be any Northern
21 Ireland-specific expert witness. Rather, Northern
22 Ireland is to be considered as part of a report from
23 Professor Marmot and Professor Bambra in the context of
24 their opinion on health inequalities in the UK and the
25 devolved administrations. Of course, we look forward to

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1 receipt of that report and we were told this morning
2 that that will be towards the end of March. But we do
3 question at this juncture whether consideration of
4 Northern Ireland as a chapter or a section or a theme of
5 a report will really be sufficient to address Northern
6 Irish preparedness, given the complexities of the
7 region, both geographically, politically and otherwise.

8 We can only raise that as a question at this
9 stage, of course, because we have very limited
10 understanding of the remit of those experts and their
11 instructions. We don't know what they will have to say
12 and we will not know for perhaps another six weeks. So
13 therefore, again joining with Mr Weatherby, we reiterate
14 the call for clarity as to their instructions. We
15 reiterate the request for disclosure of their letter of
16 instruction, which we observe really is a common and
17 reasonable request, so that we understand not only what
18 they have been asked to do but that we have an idea of
19 the materials that they are relying on in reaching their
20 conclusions whether those materials have been identified
21 by the Inquiry or as part of their expertise and, very
22 importantly, so that we can have a sense of whether the
23 Inquiry in Module 1 will have sufficient expert evidence
24 in order to fully understand preparedness in the
25 Northern Irish context.

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1 slippage in the timetable for disclosure, or witness
2 lists, or expert reports for lists of issues, and we say
3 that recognising the enormity of the task that is in
4 hand in terms of preparing disclosure and in terms of
5 ensuring that witness lists and the like are complete.

6 Already this morning there is a slippage from
7 early to mid-February for receipt of the first round of
8 expert reports now to the end of February and
9 indications maybe that there is some further slippage in
10 terms of identifying witness lists from 6 March until
11 a point beyond that. Recognising the enormous pressures
12 that everyone is under, we would urge that if there is
13 to be a four-week or thereabouts adjournment in the
14 start date that that is not a four weeks' or thereabouts
15 slippage in the timetable for disclosure.

16 We really must have all the available information
17 and disclosure as soon as possible if we are to be ready
18 for the start of June.

19 Secondly, we reiterate the call for a meaningful
20 preliminary hearing towards the end of March and, in
21 order to be meaningful, really connected to my first
22 point, there can be no further slippage in terms of
23 disclosure, so that by the end of March we are as fully
24 briefed as we can be with disclosure, witness
25 statements, and so on, so that we can assist you in

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1 My Lady, in relation to Rule 10, I again adopt the
2 submissions that Mr Weatherby has made. It is
3 reassuring to hear this morning a greater degree of
4 clarity in terms of the opportunity at least for
5 families' questions to be posed by families'
6 representatives. We make the point on behalf of those
7 whom I represent that they request that their voices are
8 heard and it will be an important part of your function,
9 my Lady, given the need to address preparedness in the
10 devolved administrations, that regional accents are
11 heard as part of this process asking questions on behalf
12 of and posed to those whom they either directly
13 represent or on whose behalf decisions were being made.

14 My Lady, as to timetable, the recognition that
15 this Inquiry will not be ready to start in May is --
16 "welcome" is perhaps the wrong word but it's certainly
17 understood and we respectfully agree. May I finish with
18 three things that we submit are required to ensure that
19 the timetable is met for the start of June, if that is
20 to be your decision, but also to ensure that there is
21 a maximum use -- sorry, a maximum effective use,
22 I should say, of the time that is available from
23 whenever we start until the point at which Module 1 is
24 concluded.

25 The first request is that there should be no

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1 identifying those important issues as to the evidence
2 that the Inquiry is going to hear in the course of this
3 module.

4 Thirdly and finally, really reflecting what I have
5 already said this morning, that we do invite
6 consideration or reconsideration on what meaningful
7 participation of Core Participants is in preparation for
8 the hearings and not just in the hearings themselves.
9 We respectfully, my Lady, ask you to consider the points
10 that have been made on behalf of the Northern Irish
11 families and consider whether a change of approach in
12 terms of engagement in a meaningful way in preparation
13 is called for from today.

14 **LADY HALLETT:** Thank you very much, Ms Campbell. Obviously
15 I will consider very carefully all the submissions you
16 very helpfully made. Thank you.

17 **MS CAMPBELL:** Thank you.

18 **LADY HALLETT:** Ms Mitchell, King's Counsel.

19 Submissions by MS MITCHELL, KC

20 **MS MITCHELL:** Is my Lady able to see me?

21 **LADY HALLETT:** I am.

22 **MS MITCHELL:** Grand.

23 We're grateful to senior counsel to the Inquiry
24 for providing a detailed note which relates to a number
25 of procedural issues that we were keen to have clarified

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1 and, as such, the remaining submissions today will be
2 relatively short.

3 First of all, if I may deal with the postponement
4 of the hearing date. The Scottish Covid Bereaved are of
5 course very keen to make progress in hearing evidence.
6 However, not at the expense of having full disclosure
7 which will allow meaningful participation in the
8 process. Therefore, given the relatively short period
9 of time which is envisaged to put back the hearing,
10 there is no objection to this course.

11 If I may move on then to briefly discussing the
12 Rule 9, which has been submitted on behalf of the
13 Scottish Covid Bereaved. On 3 January 2023, the
14 Scottish Covid Bereaved received a Rule 9 request from
15 the Inquiry. This raises a number of important
16 questions in relation to pandemic preparedness, the
17 response to which we hope the Inquiry will find helpful.

18 There will, of course, be further and more
19 detailed questions to be raised as the disclosure
20 continues. We confirm that if there are organisations
21 or individuals who do not appear in Annex A but in
22 relation to whom there is reason to believe that the
23 issuing of a Rule 9 request would be beneficial to
24 Module 1, then we shall advise the Inquiry immediately.

25 Moving on to the issue of disclosure, having heard
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1 try to do this, whilst acknowledging the huge amount of
2 work that the Inquiry team are already doing to try and
3 process disclosure as soon as possible.

4 Moving on to the issue of Parliamentary privilege,
5 it is important to the Scottish Covid Bereaved that
6 Parliamentary privilege does not impinge upon the work
7 of the Inquiry and that the Inquiry is not inhibited in
8 fully exploring the circumstances in which decisions
9 were taken and actions were carried out by politicians
10 and others in relation to pandemic preparedness.

11 We note the process by which counsel to the
12 Inquiry will address the issue of Parliamentary
13 privilege and, as he's previously noted, we consider
14 this to be a sensible course which will allow issues
15 covered by Parliamentary privilege to be addressed in
16 statements which do not have the same restrictions as
17 the doctrine of privilege.

18 In addition, we are comforted by senior counsel's
19 assurance that if a problem arises in relation to
20 eliciting evidence, this matter will be revisited and,
21 if in due course there are any such difficulties, we
22 would wish an opportunity to make submissions on that.

23 Examining witnesses. We are grateful to counsel
24 to the Inquiry for an indication of how he proposes to
25 provide Core Participants with, in effect, witness packs

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1 from senior counsel to the Inquiry this morning, we do
2 not underestimate the amount of work it is taking to
3 obtain and process and disclose the relevant documents
4 to this Inquiry.

5 We note that in senior counsel's written note, at
6 paragraph 21, the Inquiry's ideal scenario is that
7 materials be disclosed in an organised and collated way
8 but, in reality, a balance has been struck to ensure
9 documents are being disclosed as soon as possible. For
10 our part, there is considerable additional work being
11 done to try and collate relevant documents from
12 disclosure but this is a time-consuming process. We
13 imagine that other Core Participants are having the same
14 issue.

15 For our part, we consider the balance is best
16 struck by the Inquiry, where possible, delivering
17 disclosure in organised and collated tranches, even if
18 this means taking longer. Having individual documents
19 at an earlier stage without proper context means it is
20 likely that those documents need to be revisited to
21 provide context in due course when further disclosure is
22 made. Having this work done at source means it's likely
23 that Core Participants will have less work to do and
24 more likely to be prepared in time for the forthcoming
25 hearings. We would ask that consideration is given to

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1 with proposed evidence. We consider that this will be
2 a helpful method for ensuring that the issues and
3 accompanying submissions of the Scottish Covid Bereaved
4 can be flagged up, and it will minimise duplication of
5 work.

6 As has already been alluded to by senior counsel
7 to the Inquiry, we would ask that after submissions have
8 been made by Core Participants, counsel to the Inquiry
9 responds confirming whether they consider that such an
10 issue will be raised or not and, if not, we can, as he
11 suggests, bend his ear as to why we consider such lines
12 of questioning are necessary. This informal method has
13 the benefit of allowing a degree of flexibility which
14 may obviate the need for a formal process and we would
15 ask that the Chair give consideration to this.

16 The hearing dates and CP status. When the Inquiry
17 provides dates for hearings and CP status, we're
18 requested not to disclose these until they are made
19 public. In relation to the dates for hearings, this is
20 proving difficult on a practical basis for those who
21 wish to make arrangements to travel or be free to watch
22 online or even tell family members what is happening.
23 In relation to the grant of the CP status, the inability
24 to confirm this leads to similar problems. We do not
25 understand the need for such a restriction.

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1 If dates are provisional until announced, this can
2 have been made clear and the CP status of any person or
3 group once granted or refused does not seem to be
4 a matter which requires any secrecy. Can the Inquiry
5 give consideration into moving such restriction? From
6 experience, the failure in other inquiries to provide
7 information such as dates, et cetera, can lead to
8 a reduced confidence in the process by families.

9 Turning now to co-operation with the Scottish
10 Inquiry, the Scottish Covid Bereaved, I suppose, are in
11 a unique situation given the fact that we also have an
12 inquiry going on in Scotland. The Scottish Covid
13 Bereaved group is keen to understand what, if any,
14 update there is on the working relationship between the
15 two inquiries, including such issues as: whether
16 agreement has been reached that the inquiries will not
17 sit at the same time; whether disclosure will be an
18 entirely separate process or whether or not there will
19 be any collaboration in relation to document and
20 gathering; whether the Listening Exercise or Every Story
21 Counts will be two entirely separate entities, in
22 practical terms meaning that the Scottish Covid Bereaved
23 would tell their story twice.

24 Since the last hearing at the preliminary hearing,
25 the Scottish Covid Bereaved understands that

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1 person and we hope that we'll shortly be able to publish
2 the memorandum of understanding, which I hope will
3 answer some of the questions that you've have raised,
4 but obviously we'll try to make sure that the people of
5 Scotland know which inquiry is doing what and also that
6 people who receive requests for documentation and the
7 like don't have too great a burden placed upon them.

8 So thank you very much for what you said and
9 I will consider everything, as I have said. Thank you.

10 **MS MITCHELL:** I'm obliged, my Lady.

11 **LADY HALLETT:** Now, we have left Mr Lloyd Williams and
12 Ms Gallagher and I know the stenographer has been
13 working hard.

14 Could I ask Mr Williams, if you're there, roughly
15 how long you think you will be, and Ms Gallagher after
16 that the same question, to decide whether we continue
17 now or whether we break for lunch. Mr Williams, can you
18 give me any idea? Don't worry; I'm not committing you
19 to anything -- just a vague idea.

20 **MR WILLIAMS:** I can give you an estimate of 20 minutes, my
21 Lady.

22 **LADY HALLETT:** In which case. I don't need to ask
23 Ms Gallagher because I think it is better that we break
24 now, you won't feel under any constraints of time, and
25 we will come back please at 2.00. Thank you,

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1 Lord Brailsford and the Chair have met to discuss their
2 working relationship and the group would be grateful for
3 any updates that are available.

4 Memorialisation. We note the form of the memorial
5 as a 15-panel tapestry with each panel being made in
6 collaboration with an artist and particular community.
7 The Scottish Covid Bereaved would be happy to input into
8 such a project. We note that, as requested, the
9 memorial will be movable so that it can be shown in
10 Scotland and that consideration is being given to it
11 also being able to be viewed online.

12 Further, we note that the video content to reflect
13 the hardship and loss the pandemic caused is being made
14 for the opening of Module 1. The Scottish Covid
15 Bereaved welcome the opportunity to be involved in this
16 process.

17 My Lady, unless there's anything further, those
18 are the submissions for the Scottish Covid Bereaved.

19 **LADY HALLETT:** Thank you very much, Ms Mitchell -- as
20 helpful as ever -- and I undertake obviously to consider
21 them all very carefully.

22 One thing I can say today in relation to the
23 Scottish Inquiry, I can confirm that we have an
24 excellent working relationship with the Scottish Inquiry
25 team. I'm meeting Lord Brailsford again next week in

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1 Mr Williams.

2 **MR WILLIAMS:** My Lady.
3 (12.57 pm)

(Luncheon Adjournment)

(2.00 pm)

4 **LADY HALLETT:** Mr Williams, please.

Submissions by MR WILLIAMS, KC

5 **MR WILLIAMS:** My Lady, I represent Covid-19 Bereaved
6 Families for Justice Cymru. I'm going to refer to them,
7 for reasons of brevity, as "Cymru Group".

8 My Lady, we were greatly assisted by the
9 submissions made by the representatives of the Core
10 Participants who have spoken so far, in particular by
11 Ms Campbell on behalf of Northern Ireland.

12 **LADY HALLETT:** Mr Williams, sorry to interrupt you. I can't
13 see you at the moment. I don't know if your camera's
14 turned on, or are you being shy?

15 **MR WILLIAMS:** Never known to be shy.

16 **LADY HALLETT:** Yes, I can see you now, Mr Williams. Thank
17 you. Sorry to interrupt you.

18 **MR WILLIAMS:** My Lady, I was just referring to the
19 assistance we found from Ms Campbell on behalf of
20 Northern Ireland. The points that she was making there
21 are similar points to which we have in our area for
22 Wales. We get the impression of some of the documents,
23
24
25

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1 which I will just take you to very shortly, that Wales
2 is viewed as an adjunct to the UK Government, that what
3 applies to England applies to Wales, with just a bit of
4 tweaking here and there.

5 That emerges from the provisional outline of scope
6 in respect of Module 1. There are six matters that the
7 module is going to examine. The first one is a medical
8 issue and no direct relevance to these submissions. The
9 second one is the Government structures and specialist
10 bodies concerned with risk management and civil
11 emergency planning, including devolved administrations
12 and their structures. We would have thought that there
13 would be reference to "devolved governments", rather
14 than "administrations", so as to accord the Welsh
15 Government the status it deserves.

16 Thereafter, from paragraph 3 to paragraph 6
17 there's no reference at all to "devolved governments" or
18 "administrations" or anything else. There's one
19 reference to "Government bodies" in paragraph 5,
20 economic planning by relevant Government bodies, but it
21 only refers to "Government". It doesn't make it clear
22 whether it's the UK Government or whether it also
23 includes the other devolved governments.

24 It would be very helpful to have some clarity over
25 Module 1, the scope of it. We appreciate, my Lady, that

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1 the learning from past simulation exercises and have
2 responsibility for producing emergency plans. Further,
3 the Welsh Government is responsible for public health
4 services in Wales. The organisation responsible, Public
5 Health Wales, is separate to UKHSA.

6 The Welsh Government also has responsibility for
7 maintaining healthcare more generally in Wales, which
8 lays the groundwork for pandemic resilience.

9 The Cymru Group considers that NHS Wales'
10 infrastructure was not fit for purpose by Covid-19,
11 meaning that when the pandemic started to take effect in
12 Wales the health and social care services were
13 insufficiently prepared and not resilient to the
14 challenges faced. These are all matters that Cymru
15 Group wishes to explore in Module 1. As such, we ask
16 the Chair to consider when finalising the scope of
17 Module 1, that the scope will ensure sufficient scrutiny
18 of the decisions taken by the Welsh Government as to and
19 to the extent of preparedness in Wales.

20 This should include funding provided to Wales by
21 the UK Government and whether the level of funding
22 impacted on planning and preparedness in Wales,
23 intergovernmental or political relations between the
24 Welsh and UK governments. It will come as no surprise
25 those who have been watching the news over the last

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1 at the moment it's provisional but, nonetheless, this
2 question of including Wales as a separate institution,
3 separate Government, is very important to those
4 I represent. What they wish to avoid is the UK
5 Government being the primary focus of everything that
6 happens in all the evidence and all the documents, with
7 perhaps an afternoon or a day dealing with Wales. Wales
8 deserves more than that, my Lady. It's a separate part
9 of the UK.

10 Although Wales receives funding from the UK
11 Government, responsibility for health and social care
12 has been devolved to Wales since 1999; so the fact that
13 I'm making these submissions in the light of the
14 material you already have shouldn't come as a surprise
15 to anyone.

16 Wales has its own healthcare system, NHS Wales is
17 comprised of local health boards, NHS trusts and Public
18 Health Wales. Relevant offices and agencies, such as
19 the office of the Chief Medical Officer and Healthcare
20 Inspectorate are specific to Wales. This means that the
21 key decisions made in Wales in relation to the Covid-19
22 pandemic were largely separate to and often quite
23 different from those taken by the UK Government.

24 Therefore, the Welsh Government had responsibility
25 for planning for a pandemic, including forecasting and

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1 three years of the difficulties that have arisen between
2 at least Welsh Government and the UK Government. Those
3 issues need to be fully explored to find out why those
4 issues arose and what effect it may have had on the
5 relationship between Wales and the UK and, in
6 particular, what effect it might have had on provision
7 of care. We would like to consider the question of
8 co-ordination between the UK Government and the devolved
9 governments as regards preparedness, variations between
10 those governments in standard of approach to and
11 planning and preparation, preparedness as regards
12 capacity in NHS Wales for coping with and implementing
13 infection control measures in the Welsh hospitals at
14 stake and whether there was an adequate understanding of
15 and adequate resourcing for infection control measures
16 in large hospitals and care homes.

17 My Lady, turning to the issues that were raised by
18 Mr Keith, at the time of compiling this note, the Rule 9
19 corporate witness statement of the Welsh Government has
20 not yet been disclosed to Core Participants and may not
21 have been received by the Inquiry. Core Participants
22 have not had sight of the Rule 9 request itself but have
23 been provided with a summary of the request attached to
24 the CTI note, for which we're grateful, at annex A. It
25 is noted that, as regards the summary of the request to

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1 the Welsh Government, there is no specific reference in
2 the following categories: (a) the Welsh Government's
3 role in resilience and civil emergencies; (b)
4 inter-organisational co-operation and; (c) its planning
5 for a pandemic. However, these specific categories are
6 listed in the summary of the request made to the
7 Scottish Government.

8 Without seeing the Rule 9 request or the witness
9 statement and disclosures provided under this request
10 and the request made to the NHS Wales Chief Scientific
11 Adviser and Chief Medical Officer for Wales, it's not
12 possible to evaluate whether the request directed to the
13 Welsh Government has been sufficient.

14 This includes whether it will have been sufficient
15 information about the role of Wales Resilience Forum and
16 Wales Resilience Partnership Team. We note the CTI's
17 willingness to issue discrete follow-up Rule 9 requests
18 to organisations and we urge that it reviews whether to
19 do so in respect of the request to the rest of the Welsh
20 Government in view of the apparent disparity between
21 terms of the requests to Scottish and Welsh governments.

22 Turning then to the question of disclosure to Core
23 Participants, the question of timing has now rather been
24 overtaken by events because of the difficulty of
25 redacting. The only thing I would say about that at the

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1 ministers' and/or civil servants' own assessments of
2 Wales' preparedness for a pandemic.

3 Without this evidence, we merely have the
4 background of what should have been done but we're not
5 able to analyse the decision-making of whether it was
6 actually put into effect. It is anticipated that there
7 may be a great deal of memos, emails, ministerial
8 briefings and other material which will need to be
9 considered in detail.

10 The Cymru Group has received some disclosure that
11 relates to Wales. We've not yet received any witness
12 statements which are Wales-specific. The material
13 provided to date properly considers Wales as part of the
14 UK but given the devolution arrangements as set out
15 above, Wales must also be considered independently of
16 the UK. Its status should not be added on at the end of
17 the Inquiry into the UK Government.

18 My Lady, we then turn to Relativity.

19 **LADY HALLETT:** Mr Williams, sorry to interrupt, just before
20 you do, I have been getting a little anxious -- it's not
21 your fault -- but your predecessors in addressing me
22 have been referring to the pros and cons of various
23 commercial operations. I wonder if we could just keep
24 the submissions to something more neutral without using
25 specific names, if that's possible, please.

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1 present time is the fact that things may be delayed by
2 putting everything back by a month shouldn't be used to
3 put everything by way of disclosure back by a month. We
4 hope that this means that there is greater time for
5 Cymru Group to consider the documents that are going to
6 be disclosed and also to consider at length the
7 statements which we hope will be disclosed.

8 So far as contents of disclosure, from our
9 clients' own knowledge and from what has been uploaded
10 to Relativity thus far, we have been able to ascertain
11 a timeline of reports and exercises related to pandemic
12 preparedness and that's annexed to our submissions, my
13 Lady.

14 However, what appears to be missing from the
15 disclosure at present is what happened next. We note
16 disclosure is yet to be received from the Welsh
17 Government. For our clients, this will be key in
18 understanding the actions or admissions of the Welsh
19 Government in relation to pandemic preparedness. We
20 hope to be able to review into departmental
21 communications, communications between civil servants
22 and ministers, responses to the various exercises and
23 reports carried out above, actions agreed upon following
24 those exercises and reports, any audits of whether or
25 not these actions were completed and, finally, the

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1 **MR WILLIAMS:** Yes, of course, my Lady. In fact, I wasn't
2 going to refer to Relativity. I was simply going to
3 adopt the submissions made by Mr Weatherby. So that
4 saves that time and saves me referring to something
5 I shouldn't.

6 **LADY HALLETT:** Thank you very much. Sorry to have
7 interrupted you.

8 **MR WILLIAMS:** No, not at all.

9 So far as Parliamentary privilege and the
10 instruction of expert witnesses, we simply repeat our
11 submissions there. It's too early for us to make
12 a comment on it and we will if it's necessary at the
13 appropriate time.

14 So far as evidence to the proposal of procedure
15 Rule 10, we have tried to set out a way forward in terms
16 of discussions between the CTI and the various Core
17 Participants' legal advisers. There are a number of
18 ways of doing it. If I may mention one other way, in
19 the Infected Blood Inquiry the Core Participants were
20 required to submit their questions that they wanted
21 considered or issues they wanted to consider to the CTI
22 a week before the questioning of the relevant witness
23 was undertaken and then, after the evidence had been
24 given, the parties had an opportunity to email any
25 additional issues quite shortly but any additional

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1 issues that could be gone through. It was a system
2 which, taking into account the 150 or 200 witnesses that
3 were called, it worked very well.

4 The question of witnesses and hearing timetable,
5 we require quite a lot of information from the CTI
6 before we can take that very much further but we would
7 like to have the opportunity to meet with the CTI
8 remotely following the receipt of the witness list and
9 timetable so we can discuss how the matter can be
10 forwarded.

11 Opening and closing statements, my Lady. We
12 realise the difficulties on this in that the longer we
13 have to talk about it, the less time we will have to
14 hear them but we would like the opportunity in which to
15 do written opening and closing submissions and, if
16 possible, a brief oral submission at the very end.

17 The Listening Exercise, my Lady. Well, we have
18 throughout these hearings, provisional hearings, offered
19 its commitment to exercise working with the Inquiry team
20 to assist in the development of a Listening Exercise and
21 we do so again. We wish to be of every assistance we
22 can.

23 Public hearings. The problem we have with public
24 hearings, as emerged in the Infected Blood Inquiry, is
25 that not all the United Kingdom has appropriate

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1 because I hope that you understand, and those you
2 represent understand, we fully intend to ensure that the
3 interests of the people who live in Wales are properly
4 recognised during the course of this Inquiry.

5 So please do not think that anything that you've
6 seen written is meant to be suggesting that Wales is any
7 kind of adjunct or a secondary nation. It is not and
8 I'm very conscious of that.

9 So I hope that in future you and those you
10 represent will get the kind of clarity and information
11 you need on the extent to which we will ensure that the
12 interests that affect the people of Wales are properly
13 investigated.

14 So thank you very much indeed.

15 **MR WILLIAMS:** Thank you very much, my Lady.

16 **LADY HALLETT:** Right, now, I think it's Ms Gallagher.

17 **Submissions by MS GALLAGHER, KC**

18 **MS GALLAGHER:** Thank you very much, my Lady. May I just
19 confirm you can see me and hear me properly?

20 **LADY HALLETT:** I can, Ms Gallagher. May I apologise to you
21 that yet again you come last. I am sorry, this is
22 nothing personal, I assure you.

23 **MS GALLAGHER:** No problem at all. I of course address you
24 on behalf of the Trades Union Congress supported by
25 junior counsel Sam Jacobs, Thompsons Solicitors and

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1 standards in terms of the internet connection throughout
2 Wales. One way forward on that is to provide a room in
3 a particular town, whether it is the north, mid, west or
4 south Wales, where people could go, where there was good
5 connections with widescreen TVs and so they could follow
6 the proceedings without worrying about getting a good
7 connection.

8 Doing that engendered a sense of community and it
9 allowed people who had suffered terrible losses to give
10 mutual support to each other and have someone with
11 a medical background who can offer support at the same
12 time.

13 My Lady, those are my submissions.

14 **LADY HALLETT:** I'm very grateful to you and especially for
15 your helpful ideas about informal ways in which we can
16 make sure the Core Participants contribute to the
17 evidence-gathering process.

18 Can I just assure you, Mr Williams, as I think you
19 probably know, for my part and for the part of the
20 Inquiry team, Wales is definitely not seen simply as
21 an adjunct to the Westminster Government and I'm sorry
22 if the use of language has given those you represent
23 that kind of impression. I undertake to ensure that in
24 future that the status of the devolved nations is
25 properly recognised in language as well as in intent

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1 a team at the TUC and, in light of the submissions that
2 have been made by Mr Weatherby, Ms Campbell, Ms Mitchell
3 and Mr Williams, there are some points I won't need to
4 address orally because we support the submissions that
5 have been made before.

6 You will recall, my Lady, that Mr Keith, when
7 addressing you at the first preliminary hearing on
8 4 October, a little over four months ago, referred to
9 having, and I'm quoting from the transcript, an open,
10 indeed eager, frame of mind in relation to certain
11 submissions and suggestions made by Core Participants.

12 On behalf of the TUC, may I say at the outset that
13 we're very grateful to Mr Keith and his team for
14 demonstrating that open frame of mind in respect of two
15 important timetabling issues for Module 1 today.

16 First, the start date of the substantive hearings
17 for Module 1 and, secondly, our proposal of a further
18 preliminary hearing in late March 2023.

19 My Lady, I intend to address you at the outset
20 briefly on those timetabling matters in support of the
21 application made by counsel to the Inquiry at the outset
22 of this hearing and then to turn to a number of
23 constructive specific requests from the TUC, which will
24 maximise the prospects, we say, of that revised
25 timetable working, whilst ensuring that Core

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1 Participants can meaningfully engage and your Inquiry
2 can be as effective as possible in this vital module.
3 We bear in mind, in making these submissions, your
4 commitment from the outset to the core principles of
5 timeliness and effectiveness. We bear that in mind in
6 the submissions that we make in striking the right
7 balance.

8 So first, on the start date, we strongly support
9 the adjournment application advanced by Mr Keith this
10 morning, seeking to put the start date of the
11 substantive hearings for Module 1 back to early June
12 rather than early May 2023. We are grateful that the
13 Inquiry team recognises that, given the stage that has
14 been reached in terms of the disclosure process in
15 particular, the substantive hearings should not commence
16 in ten working weeks' time in early May. We strongly
17 support his application.

18 You will have seen, my Lady, from our written
19 submissions in advance of today's hearing, dated
20 8 February from last week, that we had serious concerns
21 regarding the imminence of that hearing due to start in
22 early May, the stage preparation had reached and the
23 consequent inability of Core Participants to
24 meaningfully participate in the process thus ultimately
25 undermining the effectiveness of your process.

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1 have been doing a huge amount of work since we met last
2 in this module on 4 October.

3 Second this morning, Mr Keith supported our
4 suggestion of a further preliminary hearing and you will
5 see, my Lady, we made that suggestion at paragraph 10 of
6 our written submissions. We had requested a further
7 preliminary hearing this side of the Easter break, which
8 comes in the first week of April; in other words, in
9 approximately six to seven weeks' time in late
10 March 2023.

11 We note that this morning Mr Keith indicated that
12 this could potentially -- if you were minded to list
13 a further hearing, it could potentially take place in
14 late March, possibly 28 March and, again, may we say
15 that TUC strongly supports that suggestion and we
16 further submit that leaving it any later than 28 March
17 would run the risk of derailing even a delayed start
18 date for the final hearing or, indeed, having the
19 alternative effect of the hearing proceeding without
20 Core Participants having an opportunity to meaningfully
21 contribute to the direction of travel and the finalising
22 of plans for that final hearing.

23 So, my Lady, we strongly support -- this is long,
24 we agree, but the reason I'm giving you some of that
25 detail is it then informs the submissions which will

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1 In paragraph 3 of those written submissions, we'd
2 highlighted a number of stark facts which included that,
3 as of the date of this hearing today, we understood that
4 of 114 Rule 9 requests addressed to various Government
5 departments, adversely impacted groups and other
6 organisations, only three statements had been disclosed
7 to us, to the Core Participants, and there's no
8 provisional witness list, no list of issues to be
9 explored and it seemed to us that starting in ten weeks
10 was just unrealistic against that backdrop.

11 You will see in paragraph 7 that we highlighted
12 the stark reality for Core Participants.

13 It appears to us from the submissions today and
14 the helpful engagements we have had with your team in
15 the lead up to today's hearing that some of those
16 concerns expressed particularly by us and by the
17 Bereaved Families groups have been heard and we're
18 grateful to your team for today's application to adjourn
19 and we strongly support it.

20 We emphasise in our written submissions and in the
21 submissions we make today and indeed in supporting
22 Mr Keith's application for a short adjournment that we
23 do not doubt the diligence of the counsel to the Inquiry
24 and solicitor to the Inquiry team and, indeed, we echo
25 Mr Keith's thanks to those behind the scenes who we know

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1 follow. So we agree to the proposal to move the start
2 date back to early June. We think it's realistic and
3 appropriate, and we agree to the proposal of a further
4 preliminary hearing and we ask that 28 March, the
5 proposed date from Mr Keith, be fixed and indeed that it
6 be fixed today.

7 Against that backdrop, we emphasise, my Lady, that
8 even if you agree with what Mr Keith, I think, described
9 as a modest adjournment, if you agree with that, that
10 would still mean us being 14 working weeks away from
11 Day 1 of the final Module 1 substantive hearing and that
12 still leaves a great deal of work to do in a very short
13 space of time, particularly given some of the points
14 made by Ms Campbell before the lunchtime adjournment
15 regarding slippage.

16 Against that backdrop, my Lady, we make four
17 interlinked constructive requests for the process
18 between now and 28 March and between now and early June.
19 Some will be familiar to you, a drum we've been banging
20 for some time, and you'll note the overlap between the
21 submissions we make and the submissions made by other
22 advocates this morning.

23 So the four points I want to address you on
24 briefly, my Lady are: number 1, disclosure; number 2,
25 the scope of this module; number 3, the need for

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1 transparency in the Inquiry's road map; and, number 4,
2 the expert reports.

3 So first in terms of disclosure, this may sound
4 obvious but we ask for disclosure to be made to us as
5 early as possible. It's clear that there is very
6 substantial disclosure outstanding, possibly, to use
7 a phrase from this morning, hundreds of thousands of
8 pages and, in our written submissions at paragraph 3(b)
9 that I took you to a little earlier, we referred to, of
10 114 known Rule 9 requests, us having only three
11 statements and my rather dubious maths puts that at
12 about 2.5 per cent of disclosure.

13 We now learn there may be 160 requests putting us
14 at about 1.8 per cent of disclosure. We fully
15 appreciate 160 requests does not necessarily equal 160
16 statements but it does seem to us clear that the vast,
17 vast majority of disclosure is yet to be seen by any
18 Core Participants.

19 We ask practically that there be a commitment to,
20 at the very least, best endeavours that the vast
21 majority of this disclosure be made prior to the date of
22 the proposed next preliminary hearing, 28 March.
23 28 March is just before halfway before the proposed
24 rescheduled date in early June. It will be only two
25 months before the hearing date is due to start.

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1 submissions today. We're essentially now told our
2 questions will be answered by the Rule 9s but, of
3 course, we still don't have the Rule 9s. May we remind
4 you, my Lady, of our words on 4 October, four and a half
5 months ago, it's page 105 of the transcript for that
6 hearing. We, along with Mr Weatherby and others at that
7 hearing argued for early disclosure of the Rule 9
8 requests, both as a matter of principle and
9 practicality, and we said this in respect of
10 practicality, if you will forgive me footnoting myself
11 a little earlier, but you will see why. So, my Lady we
12 said this:

13 "Our submission is that it would be efficient and
14 time saving to disclose the Rule 9 requests and to do so
15 early. We noted Mr Keith's words this morning referring
16 to the Rule 9 requests already made being described as
17 lengthy, complex and wide ranging. We assume, as they
18 are lengthy, complex and wide ranging, it's likely to
19 take some time for the resulting witness statements to
20 come back to you and your team. The advantage of Core
21 Participants having early sight of those Rule 9 requests
22 is that we can feed in, we can identify if there are
23 gaps, we can suggest additional queries or
24 clarifications on the ambitious timetable you've set
25 out. We've under seven months to the start of May. We

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1 Inevitably within that two-month period Core
2 Participants will be asked to engage with lists of
3 issues, evidence proposals and other matters, and that
4 simply cannot be done without the majority of the
5 disclosure being complete by the time we meet again and
6 us meeting again in late March.

7 Now, we realise that your team cannot do the
8 impossible. We heard Mr Keith today say very frankly
9 that he cannot guarantee that all disclosure will be
10 completed by mid-March as previously anticipated but we
11 ask that the majority of disclosure be complete by the
12 end of March and, if there are difficulties with that
13 being achieved, the 28 March hearing would then be vital
14 to take stock and ascertain what can then be achieved in
15 what will only be eight weeks until the final hearing is
16 due to start.

17 So we think that date is critical and we think
18 vast majority of disclosure being completed by that date
19 is also critical and there will only be eight weeks left
20 to go.

21 Second, my Lady, scope. You will recall that
22 we've raised concerns regarding issues concerning the
23 scope of Module 1 previously, including at the last
24 preliminary hearing on 4 October and we continued to
25 raise some questions about that in our written

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1 can see preparation of these statements may take some
2 months."

3 We finally said this, my Lady:

4 "We do not want to be in a position which is we
5 hit spring 2023 and we start to receive statements which
6 make clear that there was a blind spot or a gap. We
7 want to avoid that."

8 My Lady, it is now spring 2023. We're actually in
9 a worse position than anticipated on 4 October, as the
10 disclosure process is running behind and, in our
11 submission, the case for disclosing the Rule 9 request
12 now is even stronger than it was on 4 October. So we
13 ask that our October submissions be revisited on this
14 point, given what has happened since and where we now
15 stand, and the fact that we now are, if you grant the
16 adjournment, 14 weeks from there start of the hearing
17 and we remain largely in the dark.

18 We note that express submissions have already been
19 made on this point today by Mr Weatherby, Ms Campbell
20 and Mr Williams and we support all the submissions they
21 made.

22 Now, of course, if the disclosure could be
23 completed or substantially completed imminently, the
24 need to see the Rule 9 requests would be weakened,
25 although we do support Ms Campbell's submissions as

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1 a matter of principle in any event. We revisit this
2 request now because it seems to us clear that we will be
3 receiving disclosure very close to time and, given the
4 pressed timescales we have between now and the start of
5 June, having sight of the Rule 9s a matter of weeks
6 earlier could be helpful and could make the difference
7 between the revised timetable set out by your counsel
8 this morning being workable or not.

9 This, of course, is an inquisitorial process.
10 It's not civil litigation. When we see the disclosure
11 or if we see the Rule 9 requests, if we as Core
12 Participants identify gaps, it will be no good if we do
13 that within weeks or days of the final hearing. That
14 will just derail the process. That's why we asked for
15 transparency earlier. That's why those first two
16 requests are interlinked.

17 The scope uncertainty, my Lady, also overlaps with
18 our disclosure request in one other way. Today
19 Mr Keith, in his oral submissions, indicated that
20 Module 1 would address high level preparedness but not,
21 as he put it, sectoral and operational preparedness
22 which will be addressed in later modules. Now, we of
23 course recognise at a theoretical level that Module 1
24 will not necessarily consider all the logistical nuts
25 and bolts of particular sectors which you will be doing

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1 of the preparedness for civil emergencies but it's one
2 thing to understand the legal framework for local
3 resilience forums; it's quite another to understand how
4 in practice those forums operated, how they were funded,
5 the adequacy of that. At present, we simply have no
6 idea how those issues how the distinction between legal
7 framework at a high theoretical level and practical
8 preparedness in terms of funding and how they operated
9 in practice, how that will be dealt with in Module 1 or
10 indeed in later modules.

11 It may be that we are reassured when we know more
12 but, if not, the sooner we know the better and,
13 certainly, in good time before the 28 March hearing so
14 we and other Core Participants can address you on those
15 issues when there will still be time to shift matters
16 prior to an early June start date eight weeks out from
17 that hearing.

18 Third, my Lady, and closely related, we request
19 that the Inquiry provide additional detail regarding the
20 provisional overall road map for the Inquiry, in other
21 words further detail regarding the intended future
22 modules. Now, you have heard from me and Mr Jacobs on
23 this issue before and we deal with the issue in our
24 written submissions at paragraphs 11 to 15 but it comes
25 into very stark relief when we are a number of weeks

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1 a deep dive into in later modules. But beyond that
2 theoretical acceptance, there's very little we can say
3 to what Mr Keith has said this morning because we cannot
4 currently tell what the line between high-level
5 preparedness and sectoral and operational preparedness
6 will, in fact, look like, again because we don't have
7 the disclosure, we don't have the Rule 9 requests.

8 We're concerned that this may be -- and I put it
9 no higher than that -- a false dichotomy but, in
10 reality, we cannot engage with this properly and make
11 helpful submissions to you until we see the disclosure
12 or indeed, in the absence of the disclosure, we see the
13 Rule 9s. That's why I anticipate this may be an issue
14 to which we need to return at the March hearing, if you
15 list a March hearing and maybe we are reassured when we
16 see the Rule 9s, or when we see the disclosure, there is
17 no false dichotomy, the line is clear. We cannot tell.

18 So at the moment, we are unable to engage beyond
19 hearing the phrase uttered by Mr Keith this morning in
20 recognising, in theory, that that may be a viable
21 distinction until we actually see the material we can't
22 engage with that properly.

23 By way of one very simple example, my Lady, just
24 to concretise this, the Civil Contingencies Act of
25 course established local resilience forums, a key part

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1 away from the first intended substantive hearing and we
2 remain without detail about how Module 1 will fit with
3 later modules.

4 Now, our understanding from earlier preliminary
5 hearings was that detail of future modules would have
6 been forthcoming. The only real reason not to have done
7 so was pressure of resources at the Inquiry, which we
8 understand and are sympathetic to. But, so far, since
9 we raised this issue in October, the only further
10 information we have is the indication in the January
11 newsletter from the Inquiry about certain topics that
12 will be included in future modules. Now, we're grateful
13 for that additional information but the overall
14 envisaged shape of the Inquiry remains unclear to us.
15 With Module 1 fast approaching, it seems to us essential
16 that we have a better understanding of how Module 1 will
17 fit with the remainder of the Inquiry. The issue of
18 pandemic preparedness is obviously of vital importance.
19 It may well result in some of the most significant
20 lessons to be learnt in this Inquiry but, at present, we
21 do not have a clear understanding of how this topic will
22 fit with the later modules and we want to assist you, my
23 Lady, rather than making repeated submissions saying
24 we're in the dark, we don't know. So we would like to
25 have a clearer picture prior to the next preliminary

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1 hearing so we can consider it, take instructions, make
2 informed submissions.

3 Our core point is so long as the Inquiry continues
4 to resist revealing its thinking as to future modules to
5 Core Participants and indeed to the public, Core
6 Participants are excluded from that consideration. We
7 lose the opportunity to assist you and, worse, we're
8 having to make submissions which may be badly informed
9 but we don't know they are badly informed because we
10 don't know the thinking behind the scenes. We suggest
11 that's not efficient and it doesn't assist you and it
12 doesn't assist your team.

13 It's particularly important to have efficiency
14 when you are dealing with Core Participants like the TUC
15 who don't have large independent resources and are not
16 in receipt of public funding.

17 Fourth, my Lady, on expert reports, we've not yet
18 seen any expert reports, of course, so we're limited in
19 what we can say at this stage but we do have a specific
20 request regarding process. We're grateful for the
21 update in relation to Professor David Heymann. We
22 understand we'll now see his report within the next ten
23 days, in other words by late February, and the process,
24 as we understand it, has been that your team received
25 a first draft, then went back to him, that draft was

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1 Participants. We, of course, recognise that they are
2 working drafts and that they may be subject to revision
3 but we ask that they be disclosed at that stage. We are
4 all subject to the undertaking. We will receive them on
5 the basis that they are working first drafts and that
6 they may be subject to revision but that will allow us
7 more time to consider them, to take instructions and to
8 make submissions which ultimately will help you.

9 So there are our four specific points, my Lady.
10 We also, of course, support the request made by
11 Mr Weatherby orally today and made in writing at
12 paragraph 32 of the joint written submissions of the
13 Covid-19 Bereaved Families for Justice and the Northern
14 Ireland Covid Bereaved Families for Justice, that the
15 TUC give oral evidence, given the vital importance of
16 the TUC's evidence concerning preparedness, resilience
17 and its links to the austerity agenda and funding cuts
18 but I anticipate they are issues on which we will need
19 to address you in March when we have more information,
20 more disclosure and we can make informed submissions
21 about key witnesses. But at the present we, of course,
22 support that.

23 My Lady, in conclusion, may I say that the
24 submissions we made today are drawn from a recognition
25 of your strong commitment, which we commend and support,

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1 revised and a further version is then received and then
2 will be finalised and then disclosed.

3 So there's a process where a draft comes in and
4 there's a period of some weeks when your team has access
5 to it and Core Participants don't.

6 Now, with the other outstanding experts' reports,
7 we're now told, and thank you to Mr Keith for this, that
8 we will receive them by late March as we anticipated may
9 be the case, you I will know, my Lady, in paragraph 18
10 of our written submissions. We have two requests.
11 First, we request that all of those reports be disclosed
12 prior to the next preliminary hearing. If the
13 preliminary hearing is on 28 March, every effort must be
14 made to have disclosure of those reports prior to that
15 hearing, otherwise I'm afraid we'll all be back saying
16 you need another preliminary hearing. It may well be
17 you do need a further preliminary hearing but it seems
18 to us, to ensure that's effective eight weeks out from
19 a start date of early June, if we have the reports, we
20 can engage, we can make submissions.

21 We can hear that may well be tight, given the
22 process followed with Professor Heymann and the back and
23 forth and that's why we make a second request, my Lady,
24 which is that when the first drafts of those reports are
25 received, they be disclosed promptly to Core

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1 from the outset to those core principles of timeliness
2 and effectiveness. We bear very much in mind the
3 assurance that you gave at the 4 October hearing that
4 you will do everything in your power to achieve
5 a sensible and fair balance, with the Inquiry being as
6 thorough as possible whilst also being determined that
7 this is not an Inquiry which will drag on for decades
8 producing reports when it's too late for them to do any
9 good.

10 We are very conscious of your principal aim which
11 you have described from the outset of being to produce
12 reports and recommendations before another disaster
13 strikes the four nations of the United Kingdom and the
14 importance of learning lessons as quickly as we can in
15 order to reduce the number of a deaths, the suffering
16 and the hardship and we're grateful for the ambitious
17 timetable you have set with that in mind.

18 The submissions we have made today seek to ensure
19 that this final substantive hearing in Module 1 does
20 take place as soon as possible, using the timetable
21 outlined by Mr Keith today but also that it's effective
22 and that Core Participants' voices, experience and
23 expertise are heard and considered. If this timetable
24 is put in place today, we have 14 weeks and we will have
25 six to seven weeks before the next hearing. There is

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1 much to do. We're grateful for the shift in timetable
2 proposed by Mr Keith this morning. We support it but
3 the only way we will be able to make that timetable work
4 and be effective is if we are let in before the 11th
5 hour.

6 That's why our core submission today is more
7 transparency, earlier disclosure, earlier transparency,
8 so that Core Participants can be as effective as
9 possible and ultimately assist you in your goals, my
10 Lady.

11 Unless I can assist you further, those are our
12 submissions.

13 **LADY HALLETT:** Thank you very much indeed, Ms Gallagher, as
14 constructive as ever.

15 I do understand your concerns, I hope that's been
16 apparent this morning, about the proposed start date and
17 of course disclosure. In my view, as it seems to be the
18 view of all the participants, far better delay the start
19 by a week or more, or up to four weeks, than start early
20 and then not be ready and not be effective. So I am
21 sympathetic to those submissions.

22 If I do decide to delay the start, it will of
23 course affect the other modules and it's one of the
24 reasons why you don't have as much information as you
25 would like and I would like you to have on the later

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1 modules.

2 I hope you accept that I am somebody who believes
3 in openness and directness and I have -- I'm not
4 resistant to people knowing what my thinking is, it's
5 just that there has never been an Inquiry with so many
6 issues and so many complex issues and some of my
7 thinking does have to change as we go along. I have
8 deliberately not set the later modules in stone because
9 we have to be flexible.

10 But I can assure you and the other Core
11 Participants that whenever I feel it is appropriate and
12 I'm in a position to reveal more, then I will because
13 I know that it does help you and the other Core
14 Participants if you have as much information as
15 possible.

16 I can also assure you that I'm doing my very best
17 to get the disclosure to you as soon as possible, again
18 because I totally and utterly accept that the Core
19 Participants can only participate effectively if they
20 have sufficient time to prepare properly.

21 So your submissions and the submissions of your
22 colleagues have not fallen on deaf ears, I can assure
23 you of that. What I can necessarily do about it may be
24 limited but I promise to do by best. So thank you very
25 much.

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1 **MS GALLAGHER:** Thank you, my Lady.

2 **LADY HALLETT:** Does anybody else -- before I ask Mr Keith if
3 he wishes to make any further submissions, has anybody
4 else contacted Mr Smith, solicitor to the Inquiry?

5 They haven't, in which case I can turn to you,
6 Mr Keith, for your concluding submissions.

7 **Reply submissions by MR KEITH, KC**

8 **MR KEITH:** Thank you, my Lady. May I commence by making
9 some points, some general points about the disclosure
10 process and the submissions which have been made in
11 relation to that.

12 Plainly, the issue of disclosure lies at the
13 absolute core of the debate about the hearing date and
14 the timetable. It is obvious and it probably requires
15 no further elucidation that the Inquiry team will strain
16 every sinew to get the documents out the door to the CPs
17 as quickly as it can. Contrary to one of the
18 suggestions, there is absolutely no point at all in
19 using any delay in the start of the process, if that is
20 what you order, as an excuse to delay the disclosure
21 process. How could that possibly be the case?

22 The Inquiry team recognises completely the
23 absolute need to get the documents to the Core
24 Participants, so as to get them fully engaged, and we
25 have no doubt, my Lady, that you will set a date for the

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1 commencement of the hearing that properly reflects the
2 reality of the disclosure process.

3 But I need to make plain that the disclosure
4 process will in no way be hastened by disclosure of the
5 Rule 9s, contrary to what was suggested by Mr Weatherby.
6 Knowledge of the Rule 9s is not the same, of course, as
7 having receipt of the documents which come in response
8 to the Rule 9 requests because only the documents
9 highlight and can highlight the issues, highlight the
10 nature of the witness evidence which is to come and can
11 set out the overview of the hearing itself.

12 The disclosure process will obviously continue and
13 it continues as fast we can make it run on a rolling
14 basis. We don't and we can't wait for the receipt of
15 all the documents before disclosing them. They will go
16 out of the door as soon as each individual document
17 finds its way through the review process and is
18 obviously the subject of a decision on relevancy and all
19 the appropriate redactions are made.

20 It necessarily follows that there will come a time
21 when the vast majority of the documents have been
22 disclosed but it won't mean that there is a hard-edged
23 date by which all the documents will be received by the
24 Core Participants. Some documents may just come in late
25 and they will have to be disclosed as soon as the review

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1 process is complete thereafter.

2 In relation to the list of issues, or perhaps they
3 may be described as a road map, helpfully, by
4 Ms Gallagher, the list of issues, a list of issues is
5 obviously going to be of assistance to the Core
6 Participants because it highlights or will highlight the
7 overall approach taken by the Inquiry to the forensic
8 material. But we're unable to provide a list of issues
9 until we have read and analysed all the statements but,
10 in particular, the statements which have been received
11 very helpfully from Core Participants themselves in
12 which they set out, to a very large extent, the sorts of
13 issues that they would wish you to examine.

14 Many of them -- they all make very good points.
15 Many of them are reflected in our provisional internal
16 list of issues but not all and we obviously need to take
17 account of what is said there before we draw up a list
18 of issues.

19 But, my Lady, with your permission, may we
20 therefore proceed to try to get the list of issues out
21 to the Core Participants in the next three weeks? There
22 would be little point, it seems to me, in providing
23 a running list of issues or, in other words, a
24 provisional list of issues because, firstly, such
25 a document can't replicate and can't prejudice the job of

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1 inquiry in which you are engaged have their own personal
2 data entitlements which allows them to say properly, "If
3 we are not witnesses and we're not likely to be
4 witnesses and nothing that we have done is within the
5 scope of your Inquiry, why do our names matter and why
6 should they be disclosed?"

7 Turning to a further issue raised by Mr Weatherby,
8 which was the issue concerning the assistance which he
9 believes that his clients and family members may give in
10 relation to the provision of evidence in Module 1. This
11 is a matter, my Lady, upon which you have already ruled.
12 Of course, you ruled on the principled issue of whether
13 or not the Inquiry would receive in Module 1 pen
14 portrait evidence or evidence from the bereaved or other
15 members of the public which doesn't relate to systemic
16 issues and that caveat is extremely important and it's
17 right that I emphasise it, not least because you
18 emphasised it in the course of your ruling, given after
19 the 4 October preliminary hearing.

20 You ruled that you had not received such evidence
21 but you would of course receive evidence where it goes
22 to an issue in a module and you gave there very good
23 example of Do Not Resuscitate orders as being an issue
24 on which, in principle, bereaved members of the public
25 could or would be able to give evidence in relation to.

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1 reading the documentary material and, secondly, there
2 would seem to be little point in raising in
3 a provisional list issues which don't ultimately see the
4 light of day and are reflected in the public hearing
5 itself.

6 Mr Weatherby made some submissions in relation to
7 the redaction process concerning the names of the junior
8 officials. My Lady, may I raise just a note of caution.
9 He referred repeatedly to this process as being one by
10 which the names of witnesses were redacted. This is not
11 a process which concerns the redaction of the names of
12 persons who may or will become witnesses in due course.
13 These are emails and policy documents -- emails
14 primarily -- which refer to the names of junior
15 officials who are not concerned or were not concerned in
16 the decision-making process or played such roles as
17 lacked significance, such that they will not be
18 witnesses or are very unlikely to be witnesses in due
19 course.

20 That is, of course, why their names are
21 irrelevant. Because their names are irrelevant, it is
22 not material or information which the Inquiry is obliged
23 to disclose, for the obvious reason that the obligation
24 is to disclose relevant material and those persons who
25 have no meaningful role to play at all in the forensic

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1 So, my Lady, that's a matter which has already
2 been raised and addressed but, naturally, if in the
3 course of the preparation for Module 1, it does happen
4 that there is evidence which is relevant from bereaved
5 to an issue then, of course, it will be treated like all
6 other evidence which is potentially relevant.

7 The further submissions were made in relation to
8 the Listening Exercise and Every Story Matters. My
9 Lady, quite a lot of information was, in fact, contained
10 in annex 7 to the note from the CTI of 30 January but we
11 acknowledge, of course, that the Core Participants have
12 a very natural need for concrete detail. The reality is
13 that, as the system for the Listening Exercise is put
14 into place, as it is like pieces in a jigsaw, the detail
15 of it will naturally emerge. There is, as I've said
16 already, a plan for a webinar in the next couple of
17 weeks, to which the Core Participants, of course, will
18 be made welcome and will be invited to, in which further
19 details will be provided.

20 The reality is that this very complex, detailed
21 system, which will require a great deal of many
22 resources is put into place and as it is developed,
23 obviously the detail of it will become more and more
24 clear because it is a system to which all Core
25 Participants, like every member of the public in the

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1 United Kingdom, will be able to contribute and so they
2 will necessarily be able to see the exact shape and
3 nature of it.

4 The next issue concerns the submissions made by
5 Ms Campbell, King's Counsel, concerning disclosure of
6 the Rule 9s. As I've already submitted, disclosure of
7 there Rule 9s themselves will not really advance the
8 position of the Core Participants. Firstly, in
9 principle, there's obviously no rule of law practice
10 that necessarily provides for provision of the Rule 9s
11 but, secondly, they have already been provided with the
12 names of the Rule 9 recipients and, through the updates,
13 a broad overview of what each of the Rule 9s addresses.
14 That information says a lot about the nature of the
15 Rule 9 requests themselves.

16 But thirdly, and most importantly, it is by
17 receipt of the documents and the statements at the
18 conclusion of the disclosure process that the Core
19 Participants are enabled to understand precisely what is
20 in issue because it's the documents and the witness
21 statements which provide the foundation for the public
22 hearing, and that is why implicit in the submissions
23 that you've heard, and in particular the submissions
24 from Ms Gallagher, there is the recognition that by the
25 time they get the documents the need for the Rule 9

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1 the issue of the process by which some of the documents
2 were being disclosed but Ms Mitchell made the point,
3 with which we have considerable sympathy, that the way
4 in which the Core Participants have received the
5 documents is not altogether efficient, primarily because
6 they've received documents when they have been made
7 ready for disclosure as opposed to, for example,
8 receiving statements with links to the exhibits to which
9 the statement refers. That, I'm afraid, is simply
10 a reflection of the fact that some of the documents have
11 taken longer to be processed through the disclosure
12 procedure and we felt it best that they should receive
13 any document, whether or not it was accompanied by its
14 fellow documents, as soon as they were ready to be
15 disclosed.

16 In relation to the submissions from Mr Williams,
17 I too would like to assure him that Wales is in no way
18 being considered as an adjunct to the United Kingdom.
19 It is firmly within the scope, and indeed the
20 provisional list of issues, but more so we have issued
21 a considerable number of Rule 9s to Welsh-specific
22 Rule 9 recipients from the Welsh Government, the Welsh
23 TUC, the Welsh LGA, to ministers, civil servants, the
24 Wales Council for Voluntary Action, Department of Health
25 and Social Services Group in Wales, Disability Wales,

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1 requests themselves will have fallen away.

2 On the question of experts, the Core Participants
3 have received a considerable amount of information about
4 the topics that the experts address. The information
5 provided in the annexes to the CTI note represents the
6 substance of what the experts have in fact been asked.
7 You received a request for the materials referred to in
8 the letters of instruction to be disclosed in advance of
9 receipt of the substance of the reports themselves. We
10 would suggest that that would simply provide for an
11 extra additional level of administration. There is very
12 little purpose to be gained in providing the Core
13 Participants with the materials to which the experts may
14 in due course refer to in their final reports when they
15 will, of course, be receiving the draft reports
16 themselves in due course.

17 In relation to whether or not the experts would
18 properly be covering the same areas in relation to and
19 across the border Scotland, Northern Ireland and Wales
20 as they are in relation to the rest of the
21 United Kingdom, I absolutely assure the Core
22 Participants that they have been asked to address, of
23 course, the devolved administrations and they could not
24 sensibly have been so otherwise.

25 The submissions turned, through Ms Mitchell, to
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1 Climate Change and Rural Affairs Directorate in Wales.
2 So we have very much the affairs of Wales and the way in
3 which the pandemic affected Wales and also the issue of
4 preparedness very much in issue.

5 I should also say that the Core Participants (in
6 this particular regard, the Covid-19 Bereaved Families
7 for Justice Groups in Wales, Scotland and Northern
8 Ireland) have produced, through the statements which
9 they have provided in response to the Rule 9 request
10 directed specifically at them, very helpful indicia of
11 the sorts of issues that we should be looking at and
12 must look at and that has helped us, and will continue
13 to help us, to ensure that the right issues are
14 identified and swept up in your review.

15 Finally, in relation to the submissions from
16 Ms Gallagher, she invites you to order that the expert
17 reports be disclosed prior to 28 March, being the date
18 upon which you may be ordering a next and further
19 preliminary hearing to take place upon. We will
20 obviously aim to disclose the expert reports as soon as
21 we can but there would, in our respectful submission, be
22 little point in tying an order that they be disclosed to
23 the date of the preliminary hearing, if there be one,
24 because a breach in such an order of itself wouldn't
25 require a preliminary hearing to be heard and, in any

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1 event, the way in which the practice is meant to work
 2 and is envisaged to work is that as soon as the Core
 3 Participants get the expert reports, they will be
 4 responding to us in writing with their comments, with
 5 their observations, with any queries that they have,
 6 and, most importantly, by identifying any further areas
 7 that they would wish us to ask the experts to consider.
 8 That process will take place as soon as they receive the
 9 expert reports. It doesn't need to wait for
 10 a preliminary hearing.

11 You were also invited to fix the date for
 12 a preliminary hearing today but our position is that you
 13 would need to first rule on the anterior issue of
 14 whether or not Module 1 should be adjourned and, of
 15 course, that is not a decision which we suspect that you
 16 will make or rule upon today and, therefore, it wouldn't
 17 be right for you to make any orders in relation to the
 18 date of a further preliminary hearing since that is
 19 a subsidiary issue.

20 My Lady, those are all the matters that I would
 21 wish to raise by way of reply submission, unless there
 22 are any other areas that you would wish me to address.

23 **LADY HALLETT:** Thank you very much, Mr Keith. I'm very
 24 grateful.

25 Thank you to everybody who has attended and who
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1 has provided helpful submissions. I've now said several
 2 times that I am very grateful and I will consider those
 3 submissions carefully. Two matters that I must make
 4 a decision on as soon as I can: one, whether or not we
 5 have a third preliminary hearing as suggested by
 6 a number of the participants, particularly Ms Gallagher;
 7 and also whether or not I move the proposed start date
 8 from May until June. I know that people need to make
 9 arrangements, they need to know my decision on those
 10 issues as soon as possible, and so those are definitely
 11 matters that I will be making public as soon as I'm in
 12 a position to do so.

13 Other matters may be taken in rather slower time.
 14 Some matters may not need to be ruled upon at this stage
 15 but I will also make sure that any decisions are made
 16 public as soon as I have completed them.

17 So thank you to everybody again and that concludes
 18 this second preliminary hearing into Module 1.

19 Thank you.

20 **(3.03 pm)**

21 **(The Inquiry adjourned)**

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