

UK COVID-19 INQUIRY

MODULE 3 - FIRST PRELIMINARY HEARING

REMOTE HEARING VIA ZOOM

01 MARCH 2023

SUBMISSIONS ON BEHALF OF SCOTTISH COVID BEREAVED

1. Scottish covid bereaved are grateful for the update from the ILT on rule 9 letters and disclosure in relation to module 2. We note that as a result of the postponement of module 1, module 2 will now take place at dates to be fixed later this year.
2. As we have already made submissions on parliamentary privilege it is not necessary to repeat them here today.
3. We are obliged to counsel to the inquiry for suggesting that the “informal” process which we proposed in module 1 – to consult with counsel to the inquiry before invoking rule 10(4) – is to be included in the present module. We believe that such an informal process will be likely to obviate

the need for matters to be put before the chair in this module, and we would ask that the chair endorse this suggestion.

4. We note that in module 2 the inquiry will look into core political and administrative governance and decision-making for the UK. Module 2a will of course look at matters from a Scottish perspective. We have now had an opportunity to read the memorandum of understanding agreed between Baroness Hallett and the Scottish inquiry chair in relation to the conduct of the Scottish and UK inquiries, which was made available on the 23rd February. We note that both inquiries commit to providing clarity about how each will discharge its terms of reference, minimising duplication and maximising value to the public purse, and that the practical steps necessary are being put in place in that regard.

5. Scottish Covid Bereaved ask that we will be updated in respect of any substantive decisions that are taken in the way that the inquiries intend to interact, including the way in which evidence/documents may be shared, and details of how the Every Story Counts/Listening Project is to be carried out. It is anticipated that members of Scottish Covid Bereaved

will have suggestions on how this might be best achieved and will welcome the opportunity to contribute to this process.

6. We are also grateful to the inquiry for reflecting our earlier request in indicating its intention to minimise the impact on those who wish to participate in both listening projects. We understand that our previously voiced concerns that the UK and Scottish inquiries will not sit at the same time have been accepted. For Scottish Covid Bereaved this is an important matter as clearly the group has a significant interest in both inquiries. However, it does not appear that this has been specifically addressed in the terms of the memorandum of understanding. Scottish Covid Bereaved would welcome clarification on this point.

7. We note that both inquiries will “give consideration to incorporating findings and recommendations made by one inquiry into the evidence of the other, to the extent [that] they have been arrived at by the time required for the purposes of the other inquiry”. We would be grateful for further specification on this matter to better understand what is proposed. Clearly each of the inquiries is separate and requires to carry out its own investigations. While Scottish Covid Bereaved acknowledge

that with co-operation between the UK and Scottish inquiries -- which we hope will be time, effort and cost saving -- Scottish Covid Bereaved do seek assurance that each inquiry will be properly independent when it comes to the assessment of evidence before it.

8. These are the submissions of the Scottish Covid Bereaved.

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