

Wednesday, 1 March 2023

(10.30 am)

LADY HALLETT: Welcome everyone to the second preliminary hearing into Module 2 of the Covid-19 UK Inquiry into core decision-making.

May I first of all explain the format for this hearing. As those who have been following the Inquiry's proceedings closely will know, the format has been different for different hearings. The first hearings for Modules 1 and 2 were in-person at our proposed hearing centre, with proceedings streamed for those attending remotely. However, the hearing centre that we have chosen for the bulk of our hearings requires considerable work to be done to be fit for an inquiry of this size. We hope that most of that work will be completed before the summer when we plan to hold evidentiary hearings. All evidentiary hearings will be held in-person subject to any emergency and they will be streamed to those attending remotely.

In the meantime, the Inquiry team had to find alternative solutions for the preliminary hearings in the timetable. I decided that the first preliminary hearing in each module must take place in-person if at all possible. That is why yesterday's hearing for Module 3 was in-person.

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However, if we are to conduct a thorough and effective investigation it will take some time, despite the Inquiry team working flat out. I know of no other inquiry of its kind in the world, ie one in public, with statutory powers to obtain evidence, with Core Participants playing important roles, and with extraordinarily broad terms of reference. So with respect to certain commentators, comparisons to other countries are unhelpful.

Furthermore, I wish to emphasise: there will be no whitewash.

Second, I should like to reaffirm my commitment to ensure equalities are at the forefront of the Inquiry's work, and that means they are at the forefront of every module. There is no question of any group being sidelined or that I am not listening to them. I am. The only question is how we ensure we investigate inequalities properly and we investigate properly the disproportionate number of deaths in particular groups and communities.

In a moment, Mr Keith will outline some of the steps we have already taken. Yesterday, I heard submissions on the subject of structural racism and whether I should instruct an expert in that field. I will hear more submissions today on the same subject.

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But hearings in-person away from the hearing centre are very costly and I have a duty to protect the public purse. I decided therefore that second or third preliminary hearings for each module could be heard remotely to ensure cost-effectiveness. Hence today is a remote hearing. I am in a building in central London and counsel to the Inquiry are in a separate room. Solicitor to the Inquiry is in the same room as I am.

In a moment Mr Keith, KC, counsel to the Inquiry, will outline the issues we will have to consider today. I'm grateful to all those Core Participants who have submitted their comments in writing for me to read in advance. But before I call on him, may I correct some misunderstandings in the reports of yesterday's proceedings and the release today of Government WhatsApp messages.

First, this Inquiry will not drag on for decades. I have been determined from the outset that the Inquiry must reach conclusions and make recommendations as soon as possible if we are to achieve our aim of learning lessons and reducing suffering in any future pandemic. That is why I sought the express agreement of the then Prime Minister to issue interim reports and I have given instructions to the module teams that that is what I wish to do whenever possible.

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But they are submissions. I have not yet made a decision.

Therefore, it is wrong to report that the Inquiry has made a decision it hasn't.

It is also wrong to accuse the Inquiry of failing to examine the issue of racism. It is something very much that we intend to do.

Before I hand over to Mr Keith, may I also repeat something I said yesterday in relation to the Listening Exercise, Every Story Matters. Some Core Participants, but not all, have complained they do not have enough detail of the exercise. It is a huge project and, again, probably one of the biggest of its kind. The Inquiry team, with the task of designing and developing it, have also been working extremely hard and doing their best to consult with the appropriate groups and organisations and explain to them what they are doing as they go along. But I have asked them to redouble their efforts to explain what they are doing.

To this end, the latest Inquiry newsletter will be published this week. It sets out in clear terms what has been happening and the team will be holding a webinar shortly at which they will attempt to answer any questions and give further explanation.

Could I invite those who have concerns to read the

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1 newsletter and/or attend the webinar.
 2 I think I better turn to Mr Keith.
 3 Mr Keith.
 4 **MR KEITH:** I think, my Lady, in light of your predicament,
 5 we should probably pause for a moment or two.
 6 Can we ensure the feed is cut for a moment and
 7 perhaps I pause until you are able to gain your breath.
 8 **(Pause)**
 9 **Submission by MR KEITH, KC**
 10 **MR KEITH:** My Lady, this is the second preliminary hearing,
 11 the first one having been held by you on 31 October,
 12 almost four months ago. I don't propose to reintroduce
 13 the core participants or their legal representatives.
 14 There remain 39 Core Participants in Module 2, and all
 15 bar three are legally represented.
 16 Written submissions for today's hearing have been
 17 received from 20 Core Participants and a number of those
 18 have made joint submissions. May I add my thanks and
 19 those of the Inquiry team to your own, my Lady, for
 20 those submissions. We are very grateful to all the Core
 21 Participants for having provided us with their
 22 observations and insights and also for the brevity with
 23 which they have done so.
 24 I believe you will be hearing oral submissions
 25 from all Core Participants, in some cases jointly, bar

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1 to stop. Not only have I started this hearing with
 2 a coughing fit, for which I apologise, but also we have
 3 a technical problem and I have asked we have a short
 4 adjournment. I'm really sorry, everybody.
 5 **MR KEITH:** Of course.
 6 **(A short break)**
 7 **BARONESS HALLETT:** *(No sound transmission)* ... my coughing
 8 fit earlier, I hope we've resolved all the problems.
 9 Technology is wonderful when it works; but even the best
 10 technology can, I'm afraid, sometimes have problems.
 11 So, Mr Keith, if you could return, please, to your
 12 submissions. Thank you.
 13 **MR KEITH:** My Lady, I gather there was a problem with the
 14 feed when I began to speak, but happily not a problem
 15 with the feed when you were speaking, so, with your
 16 permission, I will restart my submissions.
 17 So, my Lady, this is the second preliminary
 18 hearing, the first one having been held by you on
 19 31 October, almost four months ago. I don't propose to
 20 reintroduce the Core Participants or the legal
 21 representatives. There remain 39 Core Participants in
 22 Module 2 and all bar three are legally represented.
 23 We have received written submissions for today's
 24 hearing from 20 Core Participants, and we are very
 25 grateful to all of them for having provided us with

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1 one; that is to say, all the Core Participants who have
 2 filed submissions.
 3 Since 31 October, a great deal of work has been
 4 done, and at a very considerable pace. As of yesterday,
 5 81 formal requests for evidence under Rule 9 of the
 6 Inquiry Rules have been sent out relating to entities,
 7 persons and organisations in Module 2 alone. 85 more
 8 have gone to entities and persons where the issues
 9 raised span not just Module 2 but Modules 2A, 2B and 2C
 10 also.
 11 217 questionnaires have gone to members of SAGE
 12 and Independent SAGE. The Rule 9 requests are formal
 13 requests for documents and, in many cases, witness
 14 statements. Most are long and complex. Particularly in
 15 the case of key decision makers, for example Government
 16 ministers. To give you a sense of the breadth and the
 17 width of the Inquiry's reach, the Rule 9 requests
 18 include such entities and bodies such as the British
 19 Medical Association, the Cabinet Office, Department for
 20 Business, Energy & Industrial Strategy, the Department
 21 for Education, Transport, Work and Pensions, Digital,
 22 Culture, Media and Sport, Health and Social Care,
 23 Treasury, the Home Office, Ministry of Justice, NHS
 24 Digital --
 25 **BARONESS HALLETT:** Forgive me, Mr Keith, I have to ask you

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1 their observations and their insights and for the
 2 brevity with which they have done so. I believe you
 3 will be hearing oral submissions from all of them, in
 4 some cases jointly, bar one participant.
 5 In terms of progress, since 31 October a great
 6 deal of work has been done and at a very considerable
 7 pace. As of yesterday, 81 formal requests for evidence
 8 have been issued under Rule 9 of the Inquiry Rules.
 9 These have been sent out to entities, persons and
 10 organisations in Module 2. 85 more Rule 9 requests have
 11 gone to entities and persons where the issues raised
 12 span not just matters arising in Module 2 but also
 13 Modules 2A, 2B and 2C. Furthermore, 217 questionnaires
 14 have gone to members of SAGE and Independent SAGE.
 15 Dealing firstly with the Rule 9 requests, these
 16 are formal requests for documents and, in many cases,
 17 witness statements. Many are long and complex,
 18 particularly in the case of key decision makers, for
 19 example Government ministers. But to give you a sense
 20 of the breadth and the depth of the Inquiry's reach, the
 21 Rule 9 requests include recipients such as the BMA, the
 22 Cabinet Office, the Chief Medical Officer, the CPS,
 23 Department for Business, Energy and Industrial Strategy,
 24 the Departments for Education, Levelling Up, Transport,
 25 Work and Pensions, Digital, Culture, Media and Sport, of

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1 course Health and Social Care, the FCGO, the Government
2 Office for Science, and many more.

3 We have also issued Rule 9 requests to 11 regional
4 mayors, including the Mayor of London, Sadiq Khan, and
5 the Mayor of Greater Manchester, Andy Burnham. Rule 9s
6 have gone to ministers, including Boris Johnson,
7 Dominic Raab, Matt Hancock, Liz Truss, Michael Gove,
8 Kemi Badenoch, Steve Barclay, Michael Ellis KC,
9 Penny Mordaunt and Justin Tomlinson.

10 A request for a witness statement has gone to the
11 Prime Minister, Mr Sunak, or rather it is due to be
12 issued in the next week or so. We have also issued
13 requests for witness statements from the First Minister
14 of Scotland, Nicola Sturgeon; the former First Minister
15 of Northern Ireland, Paul Givan, and the First Minister
16 of Northern Ireland, Baroness Foster; the former deputy
17 First Minister of Northern Ireland, Michelle O'Neill;
18 and the First Minister of Wales, Mark Drakeford.

19 Rule 9 requests will also be sent to Professor
20 Sir Chris Whitty, Professor Dame Jenny Harries,
21 Professor Jonathan Van-Tam and Professor Sir Patrick
22 Vallance, all of whom are, of course, extremely well
23 known.

24 We have requested witness statements from persons
25 who held positions in the Cabinet Office at Number 10.

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1 questionnaires to our participants SAGE and its
2 subgroups, and 17 Rule 9 questionnaires to members of
3 Independent SAGE. We have also issued detailed Rule 9
4 letters to the participants of certain members of SAGE
5 and its subgroups, such as Professor Michie,
6 Professor Edmunds, Professor Medley, Professor Ferguson,
7 Professors Horby, Woolhouse and Gowers and several more.

8 We have also issued Rule 9 requests for a witness
9 statement and disclosure of documents from Professor
10 Carl Heneghan, Professor Sunetra Gupta and Professor
11 Anders Tegnell, all of whom attended a certain meeting
12 in Downing Street in September 2020.

13 Turning to organisations and bodies relevant to
14 at-risk or vulnerable groups. Module 2, in conjunction
15 with Modules 2A, 2B and 2C, has issued over 80 Rule 9
16 requests for such organisations and bodies representing
17 the interests of women, black and minority ethnic
18 groups, children and young persons, those affected by
19 health and inequalities, those suffering from mental
20 health issues, older people, disabled people, workers
21 groups, the bereaved, LGBTQIA, and the traveller, gypsy
22 and Roma community. There will of course be yet more
23 Rule 9s issued in due course.

24 My Lady, I will say a little more on the issue of
25 expert evidence in a moment but I need to put to rest

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1 Such persons include: Lord O'Donnell, Simon Case,
2 Helen MacNamara, Lord Sedwill, Dan Rosenfield,
3 David Halpern, Lee Cain, Jack Doyle and Dominic
4 Cummings.

5 Each of these witnesses has been asked to disclose
6 to the Inquiry emails and other correspondence relevant
7 to the issues addressed in their proposed witness
8 statements, any informal or private communications about
9 the UK Government's response to the Covid 19 pandemic to
10 which they were party. And these documents include and
11 are not limited to informal group communications such as
12 text messages and WhatsApp group messages, private
13 messages, email communications and contemporaneous diary
14 or other notes. We have cast our net, my Lady, widely
15 and with a fine mesh.

16 I should say that in respect of Government
17 employees, we understand arrangements are being made to
18 reassure civil servants that they can come forward and
19 provide evidence to the Inquiry freely and fully.

20 Naturally, in light of certain press reporting
21 concerning Mr Hancock's WhatsApps, we would also
22 encourage anyone who has (*brief loss of audio*)
23 information to give and whom we ourselves have not yet
24 approached to come forward and contact us.

25 In September of 2022, Module 2 issued 200 Rule 9
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1 any notion, as you have done, that the Inquiry is not
2 addressing the hugely important issue of structural
3 racism. The Inquiry is indeed seeking to enquire into
4 the two core issues of: firstly, the impact of the
5 pandemic on at-risk or vulnerable or marginalised people
6 and on black and minority ethnic groups; and, secondly,
7 whether, in all that it did in relation to planning for
8 and responding to the pandemic, the Government and the
9 devolved administrations properly took into account the
10 considerations and interests of black and minority
11 groups and those who were at-risk or vulnerable or
12 marginalised.

13 I say that with complete confidence for a number
14 of reasons. Firstly, the terms of reference oblige the
15 Inquiry to consider any disparities evident in the
16 impact of the pandemic on different categories of
17 people, including but not limited to those relating to
18 protected characteristics under the Equality Act 2010
19 and equality categories under the Northern Ireland Act
20 1998. The characteristics that are protected by the
21 Equality Act 2010 include race.

22 Secondly, you have repeatedly stated your
23 determination to ensure that inequalities, including
24 race, are addressed in every part of this Inquiry's
25 unprecedentedly wide scope.

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1 Thirdly, Module 1 is already enquiring into, by
 2 way of direct and forthright Rule 9 requests to
 3 Government and devolved administration planners, whether
 4 and to what extent pre-existing inequalities in the
 5 population were taken into proper account in planning
 6 for a pandemic. We have asked to what extent were
 7 inequalities considered as part of the UK Government and
 8 the devolved administrations' risk assessment processes.
 9 We have asked what structures were responsible for
 10 reducing inequalities in England and in the devolved
 11 nations and what role did those structures have in
 12 pandemic planning.

13 As you know, because you referred to it in the
 14 course of the Module 1 preliminary hearing, the Module 1
 15 team intends to call Professor Marmot, author of the
 16 seminal report *Fair Society, Healthy Lives*, and
 17 Professor Bambra. Professor Marmot is one of the
 18 world's leading experts on, among other issues, the
 19 effects of the pandemic and the societal response had on
 20 social and economic inequalities.

21 Fourthly, the scoping document for this module,
 22 Module 2, states in the plainest terms that the Inquiry
 23 will identify at-risk and other vulnerable groups and
 24 the assessment of the likely impact of the contemplated
 25 non-pharmaceutical interventions, decisions in relation

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1 groups, have been included in almost every Rule 9
 2 request in Module 2. We've sent a Rule 9 request for a
 3 corporate statement to the Cabinet Office Equality Hub,
 4 which includes the Race Disparity Unit. Their response
 5 outlines the work the unit carried out in relation to
 6 the impact of the pandemic on ethnic minorities.

7 We have also sent a Rule 9 to the Equality Hub
 8 minister, Kemi Badenoch, Member of Parliament, the
 9 Minister for Women and Equalities, who was asked by the
 10 Prime Minister to lead on the UK Government's work on
 11 the assessment of the impact of Covid on ethnic
 12 minorities through the Covid disparities quarterly
 13 report, which then assisted the Government in its
 14 response to Covid. We have asked Kemi Badenoch a number
 15 of questions about this work on analysing and tackling
 16 the disproportionate impacts of Covid-19 on ethnic
 17 minorities.

18 We will be examining the substance of Public
 19 Health England's report, *COVID-19: review of disparities
 20 in risks and outcomes*, concerning the impact of Covid on
 21 disparities, including racial disparities.

22 We've sent a Rule 9 request to the Equality and
 23 Human Rights Commission, whom we understand will be well
 24 placed to assist us in looking at the impact of Covid on
 25 at-risk and vulnerable groups.

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1 to social restrictions, lockdowns and so on, on such
 2 groups in light of existing inequalities.

3 Putting it plainly, did the Government and key
 4 decision makers, when making their core strategic
 5 decisions, properly have in mind and take into account
 6 the considerations and interests of black and minority
 7 groups and those who were at risk or vulnerable or
 8 marginalised?

9 When, we are asking, did they first become aware
 10 of the disproportionate impact of the pandemic, black
 11 and minority ethnic groups, and the appalling fact
 12 that -- likely through a mixture of unequal access to
 13 health services, existing inequality, and because many
 14 were frontline health and other key workers, which meant
 15 they were more exposed to Covid -- black and minority
 16 ethnic groups suffered disproportionate health outcomes
 17 and rates of death?

18 So we are addressing head on the issue of whether
 19 the Government's decision-making had prejudicial
 20 outcomes in terms of race.

21 That is why, my Lady, you have granted Core
 22 Participant status to a cross-section of inequality
 23 groups, to ensure that those questions are properly put.

24 The issue of inequalities, which necessarily
 25 include the position of black and ethnic minority

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1 And lastly, the questionnaires to SAGE and
 2 Independent SAGE encompass questions on at-risk and
 3 vulnerable groups, and include specific questions
 4 relating to the diversity of advisers, SAGE and the
 5 subcommittees, to health inequalities, including race
 6 and economic inequalities, and the impact of such issues
 7 on the advice that they gave.

8 We have also sent a very significant number of
 9 impact questionnaires to bodies and organisations
 10 representing ethnic minorities from which we seek
 11 information about the extent to which they engaged with
 12 the UK Government on the impact of Covid in their
 13 communities, and their views on the extent to which the
 14 core decision makers in the UK considered ethnic
 15 minority communities when making their decisions.

16 Module 2, along with the relevant devolved
 17 modules, has sent Rule 9 impact questionnaires to
 18 a number of organisations representing and supporting
 19 ethnic minority communities, including Race Equality
 20 Foundation, the Runnymede Trust, Southall Black Sisters
 21 and Federation of Ethnic Minority Healthcare
 22 Organisations. It has also, finally, sent Rule 9 impact
 23 questionnaires to groups representing the bereaved, such
 24 as Covid 19 Bereaved Families for Justice, Scottish
 25 Covid Bereaved, the Covid-19 Bereaved Families for

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1 Justice Cymru, the Northern Ireland Covid-19 Bereaved
2 Families for Justice group, and Cruse Bereavement
3 Support.

4 Turning then to Module 3, finally, as you know,
5 because this was a matter in debate yesterday, the scope
6 of Module 3 includes in terms, in its scoping document,
7 at paragraphs 7 and 10, obligations on Module 3 to
8 consider the impact of the pandemic on doctors, nurses
9 and other healthcare staff by reference to ethnic
10 background and deaths caused by the Covid pandemic in
11 terms of numbers, classification and recording by
12 reference to ethnic background and geographical
13 location.

14 Later modules will continue to consider
15 inequalities, as you have said. And at their heart will
16 undoubtedly be the fact that, as the very latest ONS
17 data shows, despite the gap closing in recent months,
18 almost all minority ethnic groups died
19 disproportionately from Covid.

20 My Lady, from the plainest terms, the very issue
21 that some in certain quarters have questioned, namely
22 the Inquiry's determination to address the impact of the
23 pandemic and the Government's response on black and
24 minority ethnic groups, far from being ignored, runs
25 like a steel wire through the entirety of our world.

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1 responses.

2 The claim, as I have said, that we are not looking
3 at those issues is wrong and unfair. But there is
4 a need to separate and distinguish between whether the
5 pandemic exacerbated racial disadvantage,
6 disproportionately affected people of colour, and
7 whether the Government and devolved administrations'
8 actual decision-making led to the perpetuation of racial
9 and cultural disadvantage, and whether such advantage or
10 disadvantage or discrimination was institutionalised in
11 those Government bodies and entities.

12 As I have said, the impacts and the nature of the
13 decision making are absolutely at the centre of the
14 Inquiry. In addition, the Inquiry is already looking
15 intensely at the way in which protected characteristics
16 were or were not properly safeguarded in the particular
17 context of each module.

18 But such an inquiry cannot of itself establish
19 that racism was institutionalised. Whether it was is
20 essentially a finding of fact. A finding that there was
21 a system in place in which public policies,
22 institutional practices, cultural representations, did
23 work in a way that perpetuated and embedded racial group
24 inequality. But that is a wider and more complex issue.

25 If that is the conclusion that you reach (namely,

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1 I repeat, we are absolutely investigating the factors
2 which caused minority ethnic people to die at these
3 appalling disproportionate rates.

4 My Lady, at the same time, the very fact alone
5 that the Inquiry has reached out to the many bereaved
6 groups by way of the Rule 9 requests that I have
7 mentioned, put their views, insights and, I'm bound to
8 say, very helpful leads, demonstrates our unwavering
9 commitment for engaging with them too.

10 I now need to turn to the issue of expert evidence
11 and the suggestion that expert evidence be called to
12 assist you in relation to the issues of institutional
13 racism and structural racism.

14 As you know, my Lady, a number of organisations
15 have called for such evidence, and they have also called
16 in relation to whether the Inquiry is looking at
17 structural racism at all.

18 I have just addressed you in relation to all the
19 many areas in which the Inquiry is looking at such
20 an issue but some in certain quarters have claimed that
21 the Inquiry is not addressing the issue of structural
22 racism and nor is it considering the issue of the extent
23 to which the Government understood the possible impact
24 of its decision making and the actual disproportionate
25 impact of the pandemic and its own, the Government's,

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1 that such practices and beliefs were embedded and had
2 become institutionalised), I have no doubt at all that
3 you will not hold back from saying so.

4 We will obviously -- you will obviously consider
5 the Core Participants' submissions as you always do
6 concerning the instruction of expert evidence, but
7 I would be failing in my duty if I did not introduce
8 three notes of caution.

9 First, as has been said in legal jurisprudence
10 concerning discrimination cases, a finding of
11 institutional racism must depend on what inferences it
12 is proper for you to draw from the primary facts. It
13 will be a matter for you to determine whether you find
14 that such institutionalised racism existed, of course
15 with the help of the Core Participants. So before you
16 could do so, there would have to be a proper factual
17 foundation.

18 The second point is a related one. Having
19 an expert opine on whether she, he or they think there
20 was structural racism may be of little utility given
21 that ultimately it is a matter of fact for you. But you
22 will, of course, bear in mind everything that has been
23 said on that point from the Core Participants in their
24 written submissions and no doubt orally to you in due
25 course.

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1 Third, it will be difficult to go about building
2 the foundations for such a factual finding in Module 2
3 because Module 2 is not looking at every part of
4 Governmental structure in the United Kingdom or, because
5 of Module 2, the UK Government structure. It is looking
6 at the core decision-making and so the reach of the
7 Inquiry in terms of what documents we call for, what
8 people we examine, and what issues we look at in detail
9 will be confined within that boundary.

10 We are not looking at the entirety of the
11 Government structure, which is of course where you would
12 need to look to see the indicia of embedded
13 institutionalised racism.

14 But, my Lady, those points are all put forward by
15 way of submissions. You will reach your own view, as
16 you have already today stated that you will, as to
17 whether the Inquiry should instruct and call experts to
18 assist you to decide whether there was structural or
19 institutionalised racism; but as to whether the Inquiry
20 is indeed looking at those issues, of that there can be
21 no doubt whatsoever.

22 May I then turn to some of the specific requests
23 which have been raised concerning the scope of Module 2,
24 the issues which Module 2 seeks to address, and some of
25 the individuals and entities in respect of whom the Core

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1 Northern Ireland, the feature that the island of Ireland
2 is a single epidemiology entity and the extent to which
3 the collapse of the power-sharing agreement may have
4 impacted the response to the pandemic.

5 My Lady, you directed in fact in December that the
6 legal teams should directly explore into the
7 relationship between the devolved Governments and the
8 UK Government and between the Government in Northern
9 Ireland and the Republic of Ireland and the island of
10 Ireland as a single epidemiological unit. It is also
11 very much an issue with Module 2C but in Module 2, and
12 as far as we are concerned, we have already sought the
13 views of Governmental Rule 9 recipients and the degree
14 to which these issues played a part in their decision
15 making.

16 Rule 9s have been sent to key decision makers in
17 Northern Ireland and the Rule 9 request to Michael Gove,
18 Member of Parliament, and the First Ministers of the
19 devolved administrations have asked about the role that
20 the British Irish Council played in facilitating
21 inter-governmental relations. So we have those issues
22 very much in mind.

23 The 85 or so Rule 9s issued to cover matters
24 covering issues which span Module 2 and Modules 2A, B
25 and C, the question has been raised in relation or the

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1 Participants encourage us to issue Rule 9s.

2 **BARONESS HALLETT:** Before you do, Mr Keith, I understand one
3 of the Core Participants is having problems being
4 admitted or re-admitted to the call and I wonder if we
5 could pause now and let that person in.

6 (Pause)

7 I really would rather we didn't wait until the
8 break because it is important ...

9 **MR KEITH:** My Lady, it may be possible for whoever that
10 person or entity is to follow on the YouTube link.

11 **BARONESS HALLETT:** Very good idea. Could we please send
12 a message to the person to come in at the break and in
13 the meantime follow on YouTube. I'm grateful. Thank
14 you, Mr Keith. Sorry to interrupt you.

15 **MR KEITH:** Not at all, my Lady.

16 In relation to some of the specific requests made
17 in the very helpful submissions advanced by all of the
18 Core Participants, the Inquiry is in a position to
19 address them as follows, and I should also say that all
20 of them will naturally receive your very close
21 consideration or at least those that I don't address
22 straightaway.

23 Covid 19 Bereaved Families for Justice, Northern
24 Ireland group, at paragraph 7 to 11 of their written
25 submissions, raise some very important points about

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1 extent to which they address Module 2 issues. The vast
2 majority have been sent to organisations which operate
3 across the United Kingdom and so are issued on behalf of
4 all four modules. But some, of course, are naturally
5 specific to a particular devolved administration, such
6 as Children in Wales or the Northern Ireland Youth
7 Forum. Those will have been issued jointly by Module 2
8 as such organisations may potentially have been affected
9 by decisions made by both the UK Government and the
10 devolved administrations.

11 We have invited them to provide comments about
12 both the response of the UK Government as well as those
13 of the relevant devolved administrations of the nation
14 in which they are based. So we have that breadth of
15 request again very much in mind.

16 Thirdly, witness statements have indeed been
17 requested in the majority of the Rule 9 requests and
18 where we have requested responses to questionnaires,
19 rather than statements, we will consider whether it is
20 necessary in the course of preparing for the oral
21 hearings to have the responses formally produced by
22 a statement in due course. But the questionnaires which
23 have gone to SAGE and Independent SAGE will remain as
24 such for the time being. They will, nevertheless, all
25 be disclosed.

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1 Fourthly, we have not asked any specific questions
2 of the Government decision makers concerning the extent
3 to which those in custody were considered when core
4 political and administrative decisions were made because
5 that is an issue that is likely to be reflected in the
6 material which we get back, in any event, and the issue
7 of those in custody is more relevant for a later module.

8 I have addressed the important issues identified
9 in the written submissions of FEMHO concerning
10 structural racism, institutional racism and the need, as
11 they see it, for expert evidence. But they also raise
12 the issue of whether UK laboratory field modelling and
13 case studies at the onset of Covid included references
14 to race and/or ethnicity and if not, why not? We are
15 very grateful to you for raising this issue which we
16 will look at.

17 The issue of disability data collection,
18 relatedly, has been raised by the disabled people's
19 organisations and again, thank you, we will look at
20 that.

21 The Long Covid-related Core Participants asked
22 whether they will be asked to provide further
23 information. They have already received a request which
24 they have responded to. I can't answer that question
25 today because we are still considering that helpful

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1 decision makers, we have asked to what extent sufficient
2 consideration was given in decision making, the impact
3 of NPIs on at-risk and other vulnerable groups, and also
4 the extent to which they considered and produced
5 equality impact assessments when those decisions were
6 made. Disability, as you know, is covered as a specific
7 protected characteristic.

8 The disabled people's organisations raise further
9 a number of helpful suggestions in relation to the scope
10 of the expert reports which have been commissioned from
11 Gavin Freeguard, Alex Thomas, Professor Ailsa Henderson
12 and Professor Hale. There is much in those submissions
13 for us to consider. We will do so.

14 Some of the issues which they have raised are
15 already addressed in Module 1 and have been the subject
16 of Rule 9s in that module. Government bodies have been
17 asked general questions about the extent to which
18 vulnerabilities and inequalities were considered. We
19 will consider specifically the suggestion that a Rule 9
20 be sent to the Equality Commission.

21 Several of the Core Participants have asked
22 whether the expert reports in Module 1 will be disclosed
23 or at least made available in Module 2. The short
24 answer is that by the time of Module 2 the expert
25 reports and the evidence in Module 1 will be in the

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1 response.

2 But I should also say that Rule 9s which we have
3 recently sent to key decision makers include questions
4 about the extent to which consideration was given when
5 making decisions about NPIs to the risk of Long Covid or
6 health sequelae arising from Covid 19 infections.

7 My Lady, we have been asked whether we will be
8 calling expert epidemiologists and public health experts
9 in Module 2 on the development of the pandemic. This is
10 unlikely, although we will reflect further because we
11 will, in any event, be calling a multitude of
12 epidemiologists in Module 2 on this essentially factual
13 issue.

14 In relation to the disabled people's
15 organisations' submissions, and the extent to which
16 Government decision makers and advisers did specifically
17 have disabilities in mind, we have sent a Rule 9 request
18 to Justin Tomlinson, MP, the former Minister for
19 Disabled People, about his role in relation to the
20 United Kingdom government work. We have also received
21 back from our Rule 9 request to the Government Equality
22 Hub, considerable detail about the work of that hub and
23 of Mr Tomlinson in considering the impact of Covid on
24 disabled people.

25 But more generally, in our Rule 9s to the core
26

26

1 public domain and available.

2 But it is also likely we will seek to formally
3 introduce parts of that expert material on the basis
4 that it will be of assistance and relevant; for example,
5 the reports from Professors Sir Michael Marmot and
6 Clare Bambra.

7 We are very grateful to Save the Children UK, Just
8 For Kids Law and the Children's Rights Alliance for
9 their suggestions and we will consider them.

10 Turning to the Bereaved Families for Justice
11 Cymru's submissions, paragraphs 2 and 3, these are
12 matters that we had very much in mind, some of them in
13 fact have already arisen in the context of Module 1.

14 We have asked core decision makers generally about
15 the decision to use Public Health legislation to govern
16 the UK Government's response to Covid-19 rather than the
17 Civil Contingencies Act, and we have asked to what
18 extent that decision took into account the potential
19 that it could lead to a divergence of approach in the
20 response to Covid across the nations in the
21 United Kingdom.

22 We have also asked about the processes for
23 scrutiny and review of Covid legislation and the
24 regulations.

25 Submissions have been advanced in relation to the
26

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1 director general of the Covid-19 Crisis Coordination for
2 the Welsh Government, Mr Kilpatrick. Module 2B say that
3 he is on their radar and they intend to send him
4 a Rule 9 request in due course.

5 Turning to the local government association, they
6 raise issues concerning access to and use of data by
7 local Government during the pandemic. They have asked
8 that the details be given of local data provided to the
9 UK Government to inform its response to Covid and the
10 use of data and modelling related to issues in the
11 outline and scope. That is an issue which we have
12 already addressed in our letters of instruction to Gavin
13 Freeguard.

14 They also ask about the treatment of those in
15 social care and the issues surrounding the managing of
16 social care. Those are in fact the issues which will be
17 addressed in a later module, the module concerning
18 social care.

19 Turning to, finally but by no means least,
20 Southall Black Sisters and their written submissions.
21 Whilst we have sent a Rule 9 to the Home Office we have
22 not sent separate Rule 9 requests to the paragraph 9
23 organisations, the organisations that they refer to in
24 paragraph 9., namely the Forced Marriage Unit, the joint
25 Home Office FCO unit, the Interpersonal Abuse Unit and

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1 their diligence and hard work in scoping, drafting and
2 issuing so many Rule 9s, and in dealing with a vast
3 array of documentation which has already been received.

4 May I then turn to disclosure. I addressed you on
5 the Inquiry's disclosure processes in the confines of
6 Module 1, on 14 February, and you gave a ruling on
7 17 February in which you referred publicly to the
8 disclosure process. This, as you know, and as the Core
9 Participants also know, is the burdensome process
10 whereby each document must be individually reviewed,
11 sifted for relevancy, redacted where necessary, and then
12 sent back to the document provider for comment.

13 The process is not free of difficulties. But, in
14 light of the fact that the commencement of Module 2 has
15 inevitably gone back in view of the delayed start of
16 Module 1, the problem is now less acute than it is in
17 Module 1. As we explained in the counsel to the Inquiry
18 note sent to the Core Participants in advance of this
19 hearing, each and every document is required to be
20 reviewed and irrelevant information, including to a very
21 large extent personal data, redacted in accordance with
22 redaction protocols which of course the Core
23 Participants have seen.

24 Such irrelevant information, my Lady, includes the
25 names of junior officials who did not take relevant

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1 the UK Visas and Immigration department.

2 But Rule 9 requests have been sent to all the
3 organisations that they list in paragraph 11 of their
4 written submissions, a Rule 9 has been sent to the
5 Cabinet Office Equality Hub, the Domestic Abuse
6 Commissioner and the Victims' Commissioner for England
7 and Wales. The Rule 9s which we have sent to
8 organisations and bodies working with or representing
9 at-risk or vulnerable groups all of course raise the
10 issues which they themselves sought to raise in their
11 written submissions.

12 Finally, they raise at paragraphs 11 to 16 issues
13 concerning Northern Ireland, the power sharing collapse.
14 That, as I have said, will be a matter that will be
15 addressed in M2C, but it will naturally find reflection
16 to some extent in Module 2 because, of course, the fact
17 of the power sharing arrangements in Northern Ireland
18 and the political position there was very much a factor
19 that was in the mind of the Government when making
20 decisions in Westminster.

21 My Lady, many thousands of documents and exhibits
22 have been received from the documents provided so far.
23 They amount to hundreds of thousands of pages, although,
24 of course, not all of them are relevant and disclosable.

25 I want to commend the legal team in Module 2 for

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1 decisions themselves or whom did not substantially
2 contribute to the decision making or who played no
3 important role in the implementation of decisions.

4 Such persons can obviously be distinguished from
5 those persons who did hold more senior positions,
6 persons in the Senior Civil Service who took decisions
7 or implemented decisions. There is no secrecy issue
8 here, my Lady, let alone a row, contrary to the
9 suggestion in some quarters. The redactions are being
10 made because they are the names and the personal data of
11 individuals who are irrelevant because they played no
12 material role. But nevertheless each redaction is
13 provisional and, of course, it is subject to change as
14 a result of further inquiries we make or matters raised
15 by the Core Participants following disclosure to them of
16 the redacted document.

17 But the problem that we are faced, as you know, is
18 that given the profusion of policy documents and
19 Government emails, there are thousands of redactions,
20 the redactions of junior officials' names and personal
21 data that are required to be undertaken. And in many
22 cases it is very difficult for the individual lawyers to
23 be sure that a particular name is irrelevant,
24 notwithstanding the exclusion of that individual from
25 the list of the important persons or the persons who

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1 took the decisions that are material.
 2 So the process of disclosure has slowed down
 3 considerably. But as you would expect, the Inquiry team
 4 has taken a number of steps which we are confident will
 5 speed the process back up, whilst ensuring that only
 6 irrelevant information is redacted. So we have
 7 increased the number of reviewers to review the
 8 documents, we have blocked redacting headers to emails,
 9 and we are working towards a system of automatic
 10 redaction by the document handling system of email
 11 addresses that are not relevant.

12 Plainly, documents have not gone out to the Core
 13 Participants quite as speedily as we might have wished,
 14 but we remain determined to disclose as many documents
 15 as soon as we can. And of course in that process we
 16 continue to rely upon the assistance of the Rule 9
 17 document providers and of the Core Participants
 18 themselves.

19 Contrary, my Lady, as you've said earlier --
 20 contrary to what has been said in certain quarters, as
 21 you said earlier, the Inquiry has commenced its formal
 22 processes. Documents have been sent out. There are
 23 dates now in the diary for the evidential hearings and
 24 we are running at a very fast pace indeed.

25 Some of the Core Participants have suggested that

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1 Core Participants and, as I have sought to emphasise,
 2 the date and the hearing, or the hearing length at any
 3 rate, is currently still provisional and we will keep on
 4 eye on it.

5 Relativity. Some Core Participants have expressed
 6 a degree of concern or at least frustration with the
 7 functionality of that system. Epiq is providing
 8 training sessions and there is a link to access videos
 9 of that training. We are also exploring options to
 10 provide the Core Participants with some additional
 11 functionality in terms of coding functions and an update
 12 will be provided shortly.

13 As for the disclosure of the metadata that is
 14 sought by one or two of the Core Participants, it is
 15 common practice for inquiries to disclose pdf images
 16 with redactions applied and necessarily with limited
 17 metadata. In part, that is to ensure that any sensitive
 18 information embedded within the materials or within the
 19 metadata is not inadvertently revealed. The documents
 20 disclosed to Core Participants need to be suitable for
 21 publication, as I have said, in their existing form.

22 Parliamentary privilege I can deal with shortly
 23 indeed. It is not an issue that need detain you
 24 because, although it was raised in the CTI notes for
 25 Modules 1 and 2 out of an abundance of caution so that

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1 we disclose documents to the Core Participants without
 2 the redactions on the basis that they will keep that
 3 irrelevant but personal data confidential to themselves.

4 The difficulty though, my Lady, is that the Core
 5 Participant groups extend for many thousands of people
 6 on account of the breadth of their own memberships and
 7 maintaining confidentiality would be difficult.
 8 Moreover, we have to make redactions at some point given
 9 that many of the documents will be publicly disclosed in
 10 due course and it is far easier and more sensible to do
 11 that job now. As of yesterday, we have disclosed 3,747
 12 documents from a variety of entities and organisations
 13 and we anticipate disclosing around about 1,500 more
 14 over the next week or so.

15 Turning to the issue of the hearing length,
 16 Module 2 is currently scheduled for eight weeks. We
 17 note what is submitted in relation to whether that is
 18 long enough. But given the bulk of the documents have
 19 not yet been received, and given your own stated desire
 20 to have hearings that are relevant and not undermined by
 21 the passage of time, I'm loath to suggest to you today,
 22 considering an extension in the length of that
 23 provisional hearing date, given the impact of such an
 24 extension on the rest of the Inquiry, but my Lady I am
 25 sure that you will reflect on what has been said by the

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1 Core Participants could understand the general approach
 2 that the Inquiry is taking to the issue of Parliamentary
 3 privilege, you ruled in your 17 February ruling, that
 4 there are no issues of principle that require
 5 determination given the practical approach adopted by
 6 the Inquiry. That remains the position.

7 The next issue, my Lady, on the agenda is experts.
 8 Some of the Core Participants, Covid-19 Bereaved
 9 Families for Justice, Covid-19 Bereaved Families for
 10 Justice Northern Ireland, and FEMO, have asked that the
 11 letters of instruction be disclosed now. My Lady, as
 12 I have submitted in the past, providing the letters of
 13 instruction now is neither necessary nor sufficient.

14 Firstly, the Core Participants already have an
 15 indication from the monthly updates the broad areas to
 16 be covered. Secondly, it is not necessary to have such
 17 disclosure now because there will be time enough in
 18 advance of the process of dealing with the witness
 19 evidence proposals for the Core Participants to receive
 20 and consider the draft expert reports themselves.

21 Lastly, the provision is not sufficient because
 22 the letters of instruction provide only the framework
 23 for any expert report and can say nothing, of course,
 24 about what the experts' opinion actually is. The Core
 25 Participants need the draft reports themselves in order

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1 to be able to understand what is being opined upon.

2 That is what we are providing.

3 Turning then to the issue of Rule 10 and the
4 process by which Core Participants played their part,
5 contributing meaningfully to this process by way of
6 commenting on proposals put out by the Inquiry for how
7 witnesses should be examined, and the process by which
8 they may apply to you, the question of witnesses
9 themselves. Submissions have been made in relation to
10 that process in particular by the Long Covid groups.

11 My Lady, consistent with your ruling in Module 1
12 the Inquiry intends to put into place an additional
13 process whereby the Core Participants, following the
14 submission of their submissions, and observations on our
15 witness proposals, may be permitted to meet counsel to
16 the Inquiry in advance of the hearing so as to be able
17 to better explain the submissions that they have
18 advanced, to put forward further observations in
19 relation to their proposals. In effect, it is an
20 informal route by which they can return to the fray and
21 reargue points with CTI. My Lady, it is a second
22 opportunity to bend our ears and we gladly accept such
23 a proposal. Of course, all Core Participants will be
24 entitled to make applications under Rule 10(4) (that's to
25 say, Rule 10(4) of the Inquiry Rules) for permission

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1 to one Inquiry formally receiving evidence collated by
2 the other Inquiry or to one Inquiry, having properly
3 considered its own evidence, reaching a view that is
4 reflective of the views reached by the other.

5 My Lady, may I then turn finally by way of
6 substantive submissions to the issue of the Listening
7 Exercise, Every Story Matters. In your Module 1 ruling,
8 you directed the Inquiry team to consider ways in which
9 the communications with Core Participants of the details
10 of this important process could be improved.

11 As many of the Core Participants will be aware,
12 a newsletter is shortly to be sent out containing a
13 great deal of detail, alongside details of a webinar to
14 ensure that as many people as possible can understand
15 the work that is being undertaken, but let me attempt to
16 provide some of that detail.

17 The Listening Exercise will provide different ways
18 for people to share their stories which, when considered
19 against the background, inequality and the diverse
20 nature of society of which I have already spoken, will
21 be vital to its successes. There will be a web form
22 with a save and come back feature enabling people to
23 tell their stories at a pace and in a place that's right
24 for them. This is in fact, or will be, an improvement
25 to the form that's already there and the Inquiry's

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1 from you to ask questions of a witness.

2 The Scottish Inquiry. My Lady, on 23 February,
3 the UK Covid Inquiry and the Scottish Covid-19 Inquiry
4 published details of how they will work together by way
5 of a memorandum of understanding. The memorandum signed
6 by both Inquiries includes commitments to provide clear
7 information to the public about how each Inquiry will
8 carry out its investigations in Scotland and the United
9 Kingdom, minimise duplication of work, so information
10 sharing, and maximise value for money. The Inquiries
11 intend to meet monthly, will share information on the
12 topics and discuss issues which arise which are of
13 common application and common concern.

14 My Lady, I know, and you have stated to those
15 concerned with this process, that you are committed to
16 exploring opportunities to share facilities, to avoid
17 duplication, and to ensure that the most can be done to
18 ensure no duplication and that members of the public, in
19 particular, know to which Inquiry they may direct their
20 own concerns and enquiries.

21 Ms Mitchell, on behalf of the Scottish Covid
22 Bereaved, has raised an issue about the extent to which
23 the findings and recommendations of one may be
24 incorporated by the other Inquiry. This is still to be
25 worked out. But there is of course no legal impediment

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1 thanks go out to all those who have used the existing
2 pilot form and given such valuable feedback so far.

3 But for those who cannot go online, there will of
4 course be alternative ways for them to share their
5 stories, including a phone line, a paper form. There
6 will also be in-person sessions, held to reach seldom
7 heard or unrepresented groups. The Inquiry is looking
8 to hold community listening events across the United
9 Kingdom, and those sessions will be attended by Inquiry
10 staff. We know you are anxious to attend if time
11 permits given the demands of the public hearings.

12 I emphasise that the Inquiry will be taking
13 a trauma-informed approach in all aspects of Every Story
14 Matters and emotional support will be available.
15 Trauma-informed training will be provided for anyone
16 speaking to members of the public about their
17 experiences and we hope to ensure that all those who
18 speak and share with the Inquiry and its staff their
19 stories are safe and supported.

20 Experiences, the stories, will be gathered and
21 analysed by experts in research and analysis -- not,
22 I hasten to add, by media or communication firms and
23 I will come back to this issue in a moment.

24 But, my Lady, because we don't have enough
25 capacity in the Inquiry team to process hundreds of

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1 thousands of maybe more experiences and stories, we have
2 to procure the specialist expertise to help us to make
3 the system work. Reports will be produced, as my Lady
4 you have said in the past, for each relevant module
5 investigation and these reports will then be submitted
6 as evidence, disclosed to the Core Participants and
7 published as part of the hearings for each module of the
8 Inquiry.

9 The way we plan to gather people's stories will
10 help the Inquiry to obtain as broad an evidence base as
11 possible about the impact of the pandemic. It will
12 assist the Inquiry to reach robust findings and
13 recommendations.

14 My Lady, in recent days in certain quarters,
15 concern has been expressed about one particular aspect
16 of this process; namely, the involvement of a particular
17 third party which is believed to have worked with the
18 Cabinet Office throughout the pandemic and yet has been
19 stated by some as being involved in some way in the
20 listening aspect of the proposed Listening Exercise. So
21 may I make a number of points about this.

22 The use of the company called 23red, a
23 subcontractor in fact, gives rise to no conflict of
24 interest, either actual or perceived. This is because
25 23red worked as part of the Covid hub led by the Cabinet

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1 the Inquiry and other appointed experts and suppliers.

2 The involvement of 23red is also actually limited
3 to the current pilot stage of the Listening Exercise.
4 The tender process for the next phase has not yet
5 concluded. More information will be coming out in the
6 coming weeks about what will be procured. But ahead of
7 that point, may I say something about the procurement
8 rules that the Inquiry must follow.

9 The procurement of the services we need to deliver
10 the Listening Exercise have to be conducted through the
11 Crown Commercial Service. The Crown Commercial Service
12 provides commercial expertise to a wide number of public
13 and third party sector organisations. It provides the
14 Inquiry with a route to market through a pre-approved
15 suppliers who enable the Inquiry to secure the services
16 that we need. The alternative, my Lady, would be to
17 recruit more staff to run the procurement process
18 in-house with higher costs to the taxpayer and may also
19 lead to a less effective procurement.

20 We can't exclude any company from being on the
21 Government framework -- when I say "Government", I mean
22 the Crown Commercial Service framework -- or bidding for
23 work if they wish to do so. But, plainly, we seek
24 assurances from all suppliers that there is no conflict
25 of interest and we demand the disclosure to us of

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1 Office and was concerned in distributing a range of
2 Covid-19 related communications. It was not involved in
3 any decision making that matters to us. It was one of
4 the vehicles by which the Government got its messages
5 out to the public. So that role gives rise to no
6 conflict with any use in this Inquiry because it is
7 currently only a communications facilitator.

8 Public communications are needed to engage people
9 across all four nations in the United Kingdom and to
10 enable them to take part in Every Story Matters. We
11 require specialist communication expertise to help us
12 determine the best way to engage people to share their
13 experiences, particularly those who are
14 under-represented or not always heard, and that's the
15 expertise that 23red brings. It brings experience of
16 building partnerships to organisations across society to
17 share information, again, I repeat, to enable us to hear
18 what is being said but not to be involved in the
19 analysis in any shape or form of what those experiences
20 amount to.

21 The company is not involved in any way with the
22 listening part of the Listening Exercise with the
23 receipt of the experiences, with the members of the
24 public who contact the Inquiry, or with the analysis of
25 the information. All that will obviously be handled by

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1 information to allow us to decide whether one might
2 exist.

3 So it is possible that the new contracts to be
4 procured could include 23red -- they are legally
5 permitted to bid -- or they might not. But it is
6 important that the Inquiry follows the proper
7 procurement rules and is fair and transparent.

8 Finally, may I also say that the Inquiry has
9 appointed a six-member ethics review panel to provide
10 independent, ethical oversight of the research (*unclear*)
11 and the approach of the Every Story Matters exercise,
12 chaired by the Queen's University Belfast professor,
13 David Archard.

14 My Lady, I hope those submissions address the
15 concerns which have been expressed in some quarters
16 concerning that particular subcontractor.

17 Commemoration is an issue which is addressed in
18 counsel to the Inquiry's note. A series of meetings
19 have been scheduled with the Bereaved Families for
20 Justice Group Leeds and others to ask for their support
21 in finding people who would either be willing to be
22 filmed for videos or to speak with artists to help us
23 shape the tapestry which forms the basis of the
24 commemoration process. Progress has been excellent and
25 the Inquiry team has been hugely moved, in fact, by the

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1 stories that have been shared so far and we are
2 confident that, through working with the artists who
3 have been engaged, we will be able to produce emotive
4 and impactful pieces of art and video.

5 Procedurally, some of the Core Participants have
6 suggested that there be a further preliminary hearing in
7 the summer in addition perhaps to one in September.
8 My Lady, it is a sensible suggestion and we have it in
9 mind. Further details will of course be provided in due
10 course but such an additional preliminary hearing is
11 likely to be in July.

12 Related to the issue of a further preliminary
13 hearing, may we ask you to consider the issue of the
14 provision of a list of issues by the Inquiry team? That
15 then will provide a basis upon which submissions can be
16 directed at the preliminary hearing and will give the
17 Core Participants a better understanding of the
18 direction of Module 2. May we invite you to direct that
19 the Module 2 team provide such a list of issues by the
20 end of April or early May, depending on what you hear in
21 due course in a moment from the Core Participants.

22 Two further relatively academic issues. May we
23 seek your permission to publish the Core Participants'
24 submissions and the note from counsel to the Inquiry on
25 the website. And, finally, I should just say that the

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1 points we press upon you from our written submissions,
2 which I know you and your team will have considered
3 carefully.

4 I would like to focus on five topic headings. The
5 first, I would like to make some observations on the
6 scope of Module 2. The second, some short points on
7 timetabling and hearing dates. The third, some short
8 points on Rule 9 and disclosure. The fourth topic,
9 evidence and experts. And the final topic, the fifth
10 topic, the Listening Exercise and correct
11 commemorations.

12 In terms of the first topic I would like to start
13 with some observations on scope, please, and at
14 paragraphs 3 and 4 of our written submissions, we have
15 made the observations that at the start of the pandemic
16 the UK economy and the UK society had been subject to
17 ten years of austerity and public sector cuts. In our
18 submission, the core political and administrative
19 decision making in relation to the pandemic cannot be
20 properly examined without understanding the economic and
21 political context within which they were made.

22 The Covid-19 pandemic revealed that due to
23 austerity, public institutions and some households in
24 the UK were in a vulnerable and weak financial position,
25 which left them struggling to mitigate the immediate and

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1 public hearing in this module, Module 2 will take place
2 at Dorland House at Paddington, London, W2.

3 My Lady, those are all the points that I wish to
4 place before you and to address you upon. You may
5 consider this is a convenient moment to give the poor
6 stenographer a break from his or her endeavours.

7 **BARONESS HALLETT:** Thank you very much, Mr Keith. We will
8 break until 12.05 pm, please.

9 (11.48 am)

(A short break)

11 (12.05 pm)

12 **BARONESS HALLETT:** I now call upon Ms Anna Morris.

13 Ms Morris, are you there?

14 **MS MORRIS:** Good morning, my Lady, can you see and hear me
15 okay?

16 **BARONESS HALLETT:** I can, thank you very much.

Submission by MS MORRIS

17 **MS MORRIS:** Good morning. I alongside Mr Weatherby KC
18 represent the Covid-19 Bereaved Families for Justice.
19 We have made joint written submissions with the Northern
20 Ireland Covid Bereaved Families for Justice, and I have
21 agreed with Ms Campbell KC that she will deal with the
22 sections of our joint submissions in particular that
23 pertain to Northern Ireland.

24 I propose to draw out and emphasize some of the key

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1 devastating consequences of the pandemic.

2 We invite the Inquiry to examine the role and
3 impact of austerity on political and Governmental
4 decision making and the outcomes of such decision making
5 particularly on vulnerable and at-risk groups.

6 The second observation I would like to make is in
7 respect of structural racism. I have listened very
8 carefully to what Mr Keith KC said this morning and
9 I also had the benefit of listening to what was said by
10 yourself, my Lady, and those participants who attended
11 the Module 3 preliminary hearing yesterday.

12 The Inquiry has identified within the provisional
13 scope of Module 2 that it will address the likely impact
14 of the Government's response, including measures such as
15 non-pharmaceutical interventions, on at-risk and other
16 groups, particularly in light of "existing
17 inequalities".

18 We note that structural discrimination and racism
19 are a central and crucial example of such existing
20 inequalities. The link between structural racism and
21 racial and ethnic inequalities has been long recognised
22 and continues to confront us in our daily lives in areas
23 such as housing, access to healthcare and within the
24 criminal justice system and places of detention. We
25 therefore repeat our submission that the Inquiry should

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1 include an understanding of structural racism and
2 discrimination in its examination of the key issues for
3 Module 2.

4 We should say that it does that not only -- by
5 calling witnesses from the bereaved and other Core
6 Participants and other groups whose experience of the
7 pandemic were exacerbated by structural discrimination,
8 as well as by obtaining relevant expert evidence. The
9 Families were disappointed to hear counsel to the
10 Inquiry from Module 3, Ms Carey KC, say yesterday, in
11 the first preliminary hearing of that module, that
12 structural racism is "obviously important matters within
13 society today but ..." far broader reach than the terms
14 of reference for this Inquiry." It has been said again
15 that inequalities are at the forefront of minds, but
16 including these matters is neither necessary or
17 proportionate, although it may be a matter that the
18 Chair wishes to keep under review as the Inquiry
19 progresses.

20 We are grateful for your confirmation this
21 morning, my Lady, that you've not made a decision in
22 relation to the issue. However, the comments that were
23 made yesterday do not give the Families the complete
24 confidence that Mr Keith, counsel to the Inquiry for
25 this module, asserts that he has that the underlying

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1 yesterday on behalf of the TUC the need to understand
2 the devastating figures regarding the disproportionate
3 rate of deaths for black, Asian and minority ethnic men
4 and women. We agree. But to understand what the
5 inequalities were, you have to understand why they
6 occurred.

7 As Mr Burton, King's Counsel, highlighted
8 yesterday in his submissions on behalf of the DDC and
9 Mind, in his analysis of structural ableism, the causes
10 of inequalities may be well known but not well
11 understood. We agree that the Inquiry should seek to
12 identify inequalities and their causation within the
13 scope of the pandemic response.

14 We agree with Mr Thomas KC that this Inquiry must
15 tackle the root causes head on in order for the Inquiry
16 to fulfil its mandate and to restore trust. We agree
17 that it would be a grave mistake for the Inquiry not to
18 examine these root causes.

19 To be clear, my Lady, the Families are not asking
20 you to conduct an inquiry into structural racism, they
21 are asking the Inquiry to recognise the reality: it
22 exists, and it existed prior to January 2020.

23 What we say is the Inquiry must understand what it
24 is, how it operated and how it led to the pandemic
25 having a disproportionate effect on black, Asian and

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1 issues, the causation of those inequalities, will be
2 addressed.

3 Inequalities may well be at the forefront of
4 minds, but in our submission the Inquiry can only have
5 a deep understanding of the impact that this devastating
6 virus had upon our social body if it has a full
7 understanding of our social body's pre-existing
8 conditions, our existing ailments, which we all must
9 accept includes structural racism, which impacts the
10 lives of millions of black, Asian and minority ethnic
11 people within the United Kingdom.

12 We simply pose a logical question: how can the
13 Inquiry understand inequalities without understanding
14 the underlying social conditions which are likely to
15 have led to those inequalities?

16 As my co-counsel, Ms Munroe KC, said to you
17 yesterday on behalf of the Bereaved Families, my Lady,
18 it exists. It is an uncomfortable truth that we must
19 grapple with. Structural racism intersects and impacts
20 on all modules of your Inquiry. It is a key
21 underpinning reality in each module. In our submission
22 the Inquiry can't understand systems responses without
23 understanding the underlying system itself and cannot
24 ignore the reality of those systems.

25 Ms Munroe and Ms Gallagher KC pressed upon you

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1 minority ethnic communities. As with any area that is
2 outside the expertise of an Inquiry, we say the only way
3 to understand the position is through expert evidence.

4 We note the submissions made by Federation of
5 Ethnic Minority Healthcare Organisations about the need
6 for the Inquiry to understand how pre-existing health
7 inequality occasioned by structural racism was
8 understood by Government emergency planning and how this
9 pre-existing health inequality would probably result in
10 disproportionately adverse health outcomes within
11 communities of colour.

12 We agree that it is an integral step in then
13 identifying within Module 2 if there were any specific
14 measures taken by the Government to address the
15 disproportionate effect of Covid-19 on those communities
16 beyond those applied to the general population.

17 Mr Dayle will no doubt develop these points with
18 you later in this hearing, and we endorse what is said
19 in their written submissions, but I wanted to add the
20 point that his submissions on behalf of healthcare
21 workers and those made by Mr Thomas KC yesterday also
22 apply for the community more widely, and that our
23 Bereaved Families urge you, my Lady, to consider the
24 issue and the centrality of it to their experience.

25 We also note and agree with the written

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1 submissions made on behalf of Southall Black Sisters
2 highlighting the intersectionality of structural
3 inequalities where individuals share a number of
4 protected characteristics.

5 My Lady, we entirely appreciate the depth and
6 breadth of the Inquiry's task in Module 2 and press the
7 point because, in our view, it is a foundational issue
8 that can only assist the Inquiry's understanding of the
9 key issues.

10 I will now turn to my second topic addressing the
11 issues of start date and timetabling. In respect of the
12 start date, the Bereaved Families accept that it was
13 inevitable that the Module 1 timetable would change,
14 which of course would have an impact on the Module 2
15 timetable. We welcome the pragmatic proposals regarding
16 a new start date and a further preliminary hearing.

17 We agree with the proposals that there should be
18 a second, third and fourth preliminary hearing in the
19 summer and then in September of this year, given the
20 proposed start date of 2 October. We do see the merit
21 of there being two further hearings to ensure things
22 remain on track. The concern we raise is about the
23 hearing length. Without a clearer sense of the witness
24 list and list of issues it is not possible for us at
25 this stage to provide any alternative proposal, but we

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1 We note that our submissions find support in those
2 made on behalf of FEMHO. We agree with their practical
3 observations that the disclosure of the Rule 9 requests
4 won't create an additional layer of work for the
5 Inquiry -- we understand they have enough to do -- and
6 that we remain committed and focused on identifying
7 gaps. We agree that unless it is done, it is likely
8 that identification will happen at a time too close to
9 the hearings, leaving little opportunity for matters to
10 be addressed, which can only be to the deficit of the
11 equality of the investigation.

12 We have raised specific questions in paragraphs
13 18(a) to (e) of our written submissions, and asked for
14 a list of organisations and bodies to which the Rule 9
15 requests have been issued, and are grateful for the
16 further detail to be provided to counsel to the Inquiry
17 this morning.

18 We made a specific observation regarding groups
19 representing people in custodial settings and places of
20 detention. Mr Keith this morning has indicated this is
21 likely to be an issue for consideration in another
22 module. We maintain it is relevant to Module 2 and
23 would appreciate further clarity on the Inquiry's
24 thinking on this particular topic.

25 I then turn to my fourth and penultimate topic,

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1 would be assisted by further clarity regarding
2 timetabling to allow us to make practical and helpful
3 proposals to you my Lady.

4 I will then turn to my third topic, Rule 9 and
5 disclosure. In respect of the Rule 9 requests,
6 Mr Weatherby, King's Counsel, has made our position
7 clear in previous detailed oral and written submissions,
8 and we renew our request for disclosure of the Rule 9
9 requests and press upon you our previous submissions.

10 With the reports in today's press regarding leaked
11 WhatsApp messages from the former Health Secretary,
12 Mr Hancock, the Families more than ever need to have
13 a full understanding of what's been requested from whom,
14 and therefore have the ability to contribute our
15 assistance in identifying gaps in disclosure.

16 The Families deserve to be in the Inquiry's circle
17 of trust. They do not deserve to be left reeling from
18 media revelations regarding documentation that, I'm sure
19 your team will agree, is clearly within the Inquiry's
20 scope.

21 We are pleased to hear counsel to the Inquiry's
22 request this morning that others with relevant evidence
23 to give do so, and quickly, but we expect this request
24 to be followed by further Rule 9 requests where these
25 individuals are known.

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1 evidence and experts. Touching first on disclosure and
2 redactions, which we have addressed at paragraph 20 of
3 our written submissions.

4 Our concerns are about the Inquiry's legal team's
5 broad approach to redactions which, in our submission,
6 will impede our rapid scrutiny of the material, given
7 the fast pace that we must all adapt to between now and
8 the commencement of the oral hearing dates.

9 We are concerned that any delays in disclosure
10 will hinder our ability to identify legitimate lines of
11 Inquiry and adversely affect our Families' effective by
12 participation in the Inquiry. So we repeat our
13 submissions from Modules 1 and 3 that there are
14 practical ways outside of the broad and time-consuming
15 application of redactions to ensure that Core
16 Participants receive full and efficient disclosure
17 whilst preventing the names of those not directly
18 involved in decision making entry into the public
19 domain.

20 We have documents disclosed to us within
21 an undertaking, and we and the Families are required and
22 will maintain confidentiality, no matter how difficult.
23 Our practical suggestion is to speed up disclosure, and
24 it is easier and more sensible to do that redaction
25 process if and when a document needs to enter into the

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1 public domain.

2 Moving then to the disclosure platform. At
3 paragraph 21 of our submissions we renew our concerns
4 about the current disclosure platform and we echo the
5 request made by the children's rights organisations in
6 their written submissions that a note be circulated on
7 the issue of functionality of Relativity and that
8 practical conversations continue between CPs and the
9 Inquiry legal team.

10 Members of our team, my Lady, have worked with
11 Relativity for over ten years and are aware of its
12 potential functionality and its limitations, but we
13 submit there are seven commonsense aspects of its
14 functionality which can be enabled to make the work of
15 the Inquiry and the Core Participants easier and more
16 cost efficient.

17 On a short and important point, we now have over
18 30,000 pages of disclosure for Module 2. This will
19 increase, as Mr Keith said, exponentially over the
20 coming days, weeks and months, and our team of counsel
21 and solicitors will work tirelessly and at pace, as we
22 know your team will, to prepare for the oral hearings,
23 and this task is not underestimated.

24 We note and support the submissions made in
25 respect of funding by the TUC, who will undoubtedly play

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1 on WhatsApp messages which conflict with what was said
2 within Parliament, may decline to repeat in a witness
3 statement what they did state on the record in
4 Parliament and claim that there is no requirement that
5 they do so, using Parliamentary privilege as the
6 justification. This is likely to be a live issue and
7 soon. That is why we say the issue must be resolved
8 now.

9 I will move then to the instruction of expert
10 witnesses. Touching again on our submissions about the
11 need for expert evidence on the issue of structural
12 racism, we repeat our submissions about the need for the
13 Inquiry to have the assistance of expert evidence to
14 provide the foundation of understanding necessary to
15 analyse the disproportionate impact of the pandemic
16 response.

17 We welcome the instruction by the Inquiry of the
18 experts they have identified for Module 1, Sir Michael
19 Marmot and Clare Bambra, on health inequalities but
20 note, as we did in our submissions for that module, that
21 neither of these experts have an expertise in structural
22 racism; so repeat that there remains a lacuna in the
23 expert evidence that would assist the Inquiry.

24 In respect of the letters of instruction, we set
25 out in paragraph 27 of our written submissions our clear

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1 an important role in this and other modules. We know of
2 a similar position in regards of funding in respect of
3 Solace Women's Aid and also support their submissions.
4 We agree without proper funding being made available to
5 all non-state Core Participants the already daunting
6 task of preparing for the Module 2 hearings becomes
7 an impossible task, and the Inquiry risks losing the
8 voices of key bodies that represent millions of people
9 affected by the pandemic.

10 I will next touch on Parliamentary privilege. We
11 won't repeat our detailed arguments from Module 1 and we
12 welcome your indication, my Lady, that you will keep the
13 matter under review. We do submit that this should be
14 approached in an organised and timetabled way as it will
15 inevitably be a live issue in Module 2 given the issues
16 that it will examine. If it's not approached in an
17 organised way, the Inquiry and the Core Participants
18 will be left to deal with it in an *ad hoc* piecemeal way,
19 probably shortly before the oral hearings are due to
20 commence which can only be exploited by witnesses who
21 may be reluctant to engage with the full scrutiny of the
22 Inquiry and who may choose instead to hide behind a
23 reliance on Parliamentary privilege.

24 One can think of examples of Parliamentarians who,
25 when faced with statements made outside of Parliament or

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1 position. We continue to see no reason why they are
2 being withheld from Core Participants. Having them now
3 would allow us to prepare for the provision of comments
4 to the Inquiry and do so in a way that is most effective
5 and constructive to their task.

6 It has been said this morning that we will be able
7 to evaluate the draft reports. Well, of course we can.
8 We can only really evaluate the draft reports in
9 relation to the sufficiency to which they meet the
10 requirements of the letter of instruction.

11 May I move then, my Lady, next to dealing with
12 evidence proposals and the Rule 10 procedure.

13 Counsel to the Inquiry have accepted that this
14 Inquiry will follow the normal run of events and that
15 Core Participants can apply to question witnesses under
16 rule 10(4). We reiterate that the only meaningful way
17 to provide for the effective participation of the
18 bereaved families is for the Chair to exercise her
19 discretion in favour of allowing Core Participants to
20 ask their own questions of witnesses. As Ms Munroe said
21 yesterday in the Module 3 hearing, it is essential the
22 bereaved families have confidence in the Inquiry.

23 There is a significant benefit to having
24 a diversity of questioners with a diverse area of
25 expertise, representing a diverse range of real

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1 individuals with diverse lived experiences. It is those
 2 lived experiences, my Lady, of the bereaved families,
 3 their nuances and their complexities which infuse
 4 everything that we, as counsel and solicitors for Covid
 5 Bereaved Families for Justice and Northern Ireland Covid
 6 Bereaved Families for Justice, do on their behalf. In
 7 our submission, in order for the bereaved to be at the
 8 heart of this Inquiry, their voices must be heard not
 9 just in the evidence they can give but in the questions
 10 that they can ask.

11 To be clear, my Lady, our questions to the Inquiry
 12 will be focused and relevant and will always be intended
 13 to assist your Inquiry, not elongate it nor divert it on
 14 irrelevant tangents. We are a counsel team with a depth
 15 and breadth of experience in public inquiries and know
 16 from that experience that it is perfectly possible for
 17 a sensible and collaborative relationship to be
 18 established between counsel to the Inquiry and
 19 representatives, which includes a formal process and
 20 a dialogue about lines of questioning, but which also
 21 enables representatives to ask those questions of
 22 witnesses directly within the structure of the Rule 10
 23 process and your own case management guidance.

24 Mr Keith this morning has said that Core
 25 Participants may be permitted to meet counsel to the

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1 The families need transparency on conflicts of interest
 2 in respect of those being appointed, and being
 3 considered for appointment, for the delivery of the
 4 Listening Exercise, including the criteria the Inquiry
 5 is applying to such conflicts, if any, and how such
 6 conflicts are being considered.

7 Consideration of those conflicts of interest
 8 should also include perception of such conflicts given
 9 the trauma involved in bereaved family members assisting
 10 this process. Mr Keith's provision of further details,
 11 involving the use of 23red this morning, is the detailed
 12 information that the families require of all the
 13 contractors and subcontractors so that they can decide
 14 whether they perceive the existence of a conflict. The
 15 fact that 23red dealt with Government communications and
 16 messaging doesn't in the view of the bereaved families
 17 remove any conflict, given the issue of Government
 18 messaging is within the scope of Module 2 of this
 19 Inquiry.

20 We note the written submissions on behalf of
 21 disabled people's organisations, which also request the
 22 Inquiry to adopt a robust and transparent approach,
 23 clarifying who has been appointed to carry out the work
 24 of the Listening Exercise and how any conflict issues
 25 have been resolved.

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1 Inquiry and can, to use his words, return to the fray
 2 and argue the points with CTI as to the topics that they
 3 say is relevant to the Inquiry's scope. He's also
 4 reiterated that all Core Participants can apply to you
 5 for permission under Rule 10(4)(4) to ask questions
 6 themselves. The families trust that this is
 7 a recognition that the topics can be the subject of
 8 formal and informal process and dialogue but that you,
 9 my Lady, will be unfettered in exercising your
 10 discretion in permitting Core Participants' permission
 11 under Rule 10(4) in the usual way.

12 I'll turn then to my fifth and final topic and
 13 make some short points about the Listening Exercise and
 14 commemorations. In respect of the Listening Exercise,
 15 the matters raised in our Modules 1, 2 and 3 submissions
 16 reflect the strength of feeling of the bereaved families
 17 in relation to the Listening Exercise. We welcome the
 18 Chair's ruling that the consideration will be given to
 19 ways in which the Inquiry's communication with our
 20 families will be improved, and we welcome the
 21 endorsement this morning of a trauma-informed approach,
 22 which of course is significant when listening to the
 23 lived experience of the bereaved.

24 I repeat and endorse the submissions made by
 25 Mr Weatherby on 14 February in the Module 1 pre-hearing.

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1 In terms of the practicalities of the exercise
 2 itself, we listened carefully to your Module 3 opening
 3 remarks yesterday, my Lady, and this morning, and we
 4 welcome the further information indicated in this week's
 5 newsletter and the forthcoming webinar.

6 Finally then, my Lady, on the commemorations. We
 7 welcome the Inquiry's continued work around the
 8 commemorations and the bereaved families remain
 9 committed to assisting you with that task. We welcome
 10 your team's approach to the families to discuss the
 11 establishment of a meaningful and long-lasting
 12 commemorative programme. On this, and all other
 13 matters, my Lady, we will continue to assist your
 14 Inquiry and your team.

15 Unless I can assist you further, my Lady, those
 16 are my submissions.

17 **BARONESS HALLETT:** Thank you very much indeed, Ms Morris.
 18 Extremely helpful and, as you have acknowledged, I have
 19 not made a decision on some of the important aspects of
 20 your submissions and obviously, as soon as I have made
 21 a decision, I will let you all know with my reasons. So
 22 thank you very much indeed.

23 I think it is now Ms Campbell.

24 **MS CAMPBELL:** My Lady, yes. I hope you can hear me and see
 25 me.

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1 **BARONESS HALLETT:** I can do both. Thank you, Ms Campbell.

2 **Submissions by MS CAMPBELL**

3 **MS CAMPBELL:** My Lady, may I start by saying I'm grateful to
4 Ms Morris this morning. The power of her submissions
5 will not be improved by my repetition of them and
6 your Ladyship knows well that on behalf of the Northern
7 Irish bereaved families we are working closely with the
8 UK family team, as well as indeed many other Core
9 Participants, so as to identify areas of common concern
10 and to strengthen the voices of those whom we represent
11 and to bring to the fore the issues of importance to
12 them.

13 We hope that that approach also really reinforces
14 our commitment to ensuring that you meet your objective
15 to balance depth and detail of your Inquiry, the
16 efficacy of the Inquiry and of your investigation
17 against the time available and, of course, the passage
18 of time. However, we are always alert to the risk that
19 the issues that are unique to Northern Ireland, and
20 therefore don't attract that distinct and adequate
21 focus, not for the first time I will say and I know not
22 for the first time, my Lady, you will hear that Northern
23 Ireland is in a unique position both geographically and
24 politically. And it is in this module, focusing on
25 central Government decision-making, that that concern

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1 executive in the north at times.

2 We note also that it appears that relevant
3 counterparts in the Irish Government, certainly don't
4 appear to have been approached or asked for such
5 assistance that they might be in a position to give.
6 I say "it doesn't appear to" because of course we are
7 working from the information that your team has very
8 helpfully given in the note ahead of this module.

9 If this module is really to identify lessons
10 learned and issues that need further consideration to
11 ensure that the suffering of the people of Northern
12 Ireland is lessened in any future pandemic, it is going
13 to be imperative that those central Government decisions
14 and consideration of cross-border, cross-country and
15 cross-Governmental issues are tackled and we therefore
16 urge, both in writing and today orally, that your team
17 commence that process now.

18 As I said, my Lady, it is useful to learn today
19 that there is detail in Rule 9 requests that focus on
20 particular agencies asking questions about Northern
21 Irish specific issues. But learning that today perhaps
22 illustrates another concern that our membership has and
23 that is one of disclosure and, indeed, transparency.

24 You will be acutely aware, my Lady, that for many,
25 if not all, of those who have lost family members and

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1 about a possible failure to consider the unique position
2 of Northern Ireland is perhaps at its highest.

3 Did the UK Government adequately and fully
4 consider the unique impact of the pandemic on the
5 population of Northern Ireland, and did decision-making
6 at a central Government level reflect our unique
7 position? Those are questions that cause a great many
8 members of the bereaved families whom we represent
9 concern. It is for that reason that at paragraphs 8 to
10 11 of our joint submissions we raise queries also as to
11 the extent of your team's consideration of our unique
12 position. I know that my Lady has reassured us, as has
13 your counsel team in the past, that those issues are
14 under detailed consideration.

15 We have heard this morning Mr Keith's response to
16 some of the issues that we raised and, of course, it is
17 useful to know that Northern Ireland specific questions
18 have been raised and Rule 9 requests been sent to
19 ministers such as Michael Gove, being one example. But
20 we do note, however, that neither of the two members of
21 Parliament who held the role of Northern Ireland
22 Secretary of State appear to have been approached for
23 their input via the Rule 9 process and we raise that as
24 an issue of consideration, particularly important, it
25 might be thought, given the lack of a functioning

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1 who firmly believe that the deaths were avoidable,
2 confidence in central Government decision-making has
3 been damaged, if not in some cases completely broken.

4 Of course, this Inquiry has an important function
5 in rebuilding aspects of that public confidence. There
6 are, we contend, building blocks that can be put in
7 place now. My Lady has heard this morning from
8 Ms Morris, and indeed at previous preliminary hearings,
9 these requests that I now echo: firstly, transparency in
10 the evidence-gathering process; disclosure of the detail
11 of Rule 9 requests; from a Northern Irish perspective,
12 at least disclosure of those questions that have been
13 asked of ministers or agencies that focus in particular
14 on Northern Ireland and not simply, although we are
15 grateful for it, an update in a preliminary hearing.

16 Linked to that, transparency also in the
17 disclosure process itself and timely disclosure.
18 My Lady has heard that before and I won't repeat it but,
19 of course, the fact that the hearing dates have moved
20 back to the autumn should not allow for any slippage in
21 terms of timely disclosure to the families. We have, as
22 has your team, an enormous amount of work to do.

23 The other building block is ensuring that the
24 voices of the bereaved and the families whom we
25 represent are heard. My Lady, we don't underestimate

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1 for a single moment the enormity of the task that you
2 have and the enormity of the task that the Inquiry team
3 faces, nor do we underestimate the diligence with which
4 they approach their tasks. We understand and appreciate
5 that. But we do reiterate the submissions of this
6 morning, and those made in earlier preliminary hearings,
7 that clarity of process and equality of access are of
8 fundamental importance. Rule 10 requests perhaps
9 illustrate this most vividly.

10 We will of course work with any procedure that you
11 put in place in terms of written questions and in terms
12 of the opportunity to liaise with your team to identify
13 areas of questioning. But it is our submission that
14 your Inquiry will be the poorer if the voices of those
15 who were most gravely impacted by the pandemic are not
16 heard through the questions that are asked on their
17 behalf by those who closely represent them. My Lady,
18 I know that the Inquiry's approach to this issue remains
19 open, and I raise it this morning simply to reinforce
20 once again just how important it is likely to be going
21 forward to ensure that the Northern Ireland bereaved
22 families feel that their voices are being heard as part
23 of your Inquiry.

24 Thank you.

25 **BARONESS HALLETT:** Thank you very much indeed, Ms Campbell.

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1 despite your Ladyship's stated aim and in order to do
2 justice to all those affected by the pandemic.

3 The families comprising Scottish Covid Bereaved we
4 represent at both the Scottish and UK public Inquiries
5 were advised that they could be waiting several years
6 before proceedings are concluded, and to place their
7 faith in the ability of both Inquiries to deliver
8 a robust Inquiry that will provide answers and enable
9 lessons to be learned on the handling of the pandemic.
10 Your Ladyship's decision to produce interim reports and
11 recommendations is particularly welcome in these
12 circumstances.

13 Your Ladyship is obviously aware of, and has
14 already been referred to, the news last night that over
15 100,000 WhatsApp messages of the former health
16 secretary, Matt Hancock, containing over 2.3 million
17 words were leaked to the press. It will be unlikely to
18 come as any surprise to your Ladyship of how shocked the
19 members of Scottish Covid Bereaved were to learn of
20 this. If what it appears is contained within those
21 texts is correct, then it would demonstrate that
22 ministers of state at the highest level were making
23 critical decisions on matters of the utmost severity via
24 WhatsApp. Undoubtedly, ministers would know that such
25 messages cannot be requested by freedom of information

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1 You ask some important questions. I will do my best to
2 discover the answers to them. I'm afraid I don't know
3 off the top of my head who has been approached by Rule 9
4 requests, other than what Mr Keith told us earlier, but
5 we will find out. Obviously today's focus was 2 rather
6 than 2C but we can make sure that the information is
7 available. So thank you very much indeed.

8 **MS CAMPBELL:** Thank you.

9 **BARONESS HALLETT:** If we could turn, please, to
10 Mr McCaffrey.

11 **MR McCAFFREY:** Good morning, my Lady.

12 **BARONESS HALLETT:** Good morning, Mr McCaffrey.

13 **Submission by MR McCAFFREY**

14 **MR McCAFFREY:** Kevin McCaffrey and I appear before
15 your Ladyship today in lieu of Ms Mitchell, King's
16 Counsel, and on behalf of Scottish Covid Bereaved
17 instructed by Aamer Anwar & Company Solicitors.
18 Your Ladyship does of course already have our brief
19 written submissions. However, I would wish to add,
20 equally briefly I hope today, to those written
21 submissions.

22 Firstly, we welcome your Ladyship's introductory
23 remarks with regard to your aim and indeed intention to
24 conclude this Inquiry as soon as possible. We also
25 understand this will necessarily take considerable time,

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1 requests.

2 Some of the allegations contained in the press are
3 who deeply horrifying and upsetting for the families we
4 represent. For example, some of those allegations claim
5 that testing of those discharged to care homes, despite
6 strong advice to do so by the Chief Medical Officer, it
7 appears was ignored on the basis of meeting testing
8 targets. If true, we submit that revelation alone goes
9 to the heart of the stated aims of Module 2 as contained
10 in paragraph 2 of the provisional outline of scope.

11 We are aware that many lawyers have been going
12 through the process of redacting names from tens of
13 thousands of pages of recovered documents as is normal
14 in public inquiries. While we, as representatives of
15 our clients and Core Participants to the Inquiry, must
16 sign undertaking to protect the confidentiality of all
17 Government disclosure, the impression from last night's
18 revelations is that the former health secretary had
19 provided the entire contents of over 100,000 of his
20 messages that contained critical decision-making detail
21 during the pandemic to his biographer. It appears to us
22 that the Prime Minister, former Prime Minister, cabinet
23 ministers, chief medical officers and senior civil
24 servants are likely to have been engaging in the to and
25 fro of these messages.

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1 We submit that anything less from Mr Hancock
2 would, for the bereaved families, significantly damage
3 the integrity of both the UK and Scottish public
4 inquiries and that is to release all of these texts to
5 the Inquiry on demand. It appears clear from last
6 night's revelations that the Cabinet Office were privy
7 to this material released by Mr Hancock to his
8 biographer, and that they had the right to veto such
9 disclosure. Therefore, the question we are bound to ask
10 is whether such crucial material has, in fact, been
11 released to the Public Inquiry without redaction?

12 It would, as we are sure your Ladyship will
13 understand, be deeply insulting to the families if they
14 have to read redacted material whilst the same material
15 was being leaked in full on a daily basis through the
16 media.

17 In the prologue to his pandemic diaries,
18 Mr Hancock claims he disclosed all his records to this
19 UK Covid Inquiry. As a result, those instructing Aamer
20 Anwar & Company seek the Inquiry legal team's
21 clarification as to whether those texts have indeed been
22 fully disclosed and, if they have not, that the Inquiry
23 would now direct immediate and full disclosure.

24 While it is trite to observe, we submit that no
25 individual, no matter their current or previous office,

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1 that.

2 **BARONESS HALLETT:** Yes and you had then moved to
3 Parliamentary privilege.

4 **MR McCAFFREY:** I'm obliged, my Lady.

5 As I said, my Lady, your Ladyship already has our
6 submissions on Parliamentary privilege and it is not
7 necessary to repeat those here today.

8 However, we do accept that the disclosure of
9 Rule 9 requests has been covered in the submissions of
10 many of the Core Participants and we do not wish to
11 rehearse that either. But we would note that if the
12 Rule 9 requests were to be disclosed to Core
13 Participants, then this would obviously provide some way
14 of assurance to the families of Scottish Covid Bereaved,
15 and others of course, of exactly what has been
16 requested.

17 We are obliged to counsel to the Inquiry for
18 suggesting that the informal process which we proposed
19 in Module 1 to consult with counsel to the Inquiry
20 before invoking Rule 10(4) is to be included in the
21 present module.

22 We believe that such an informal process will be
23 likely to obviate the need for matters to be put before
24 the Chair in that module and would ask that the Chair
25 endorse this suggestion. Again, CTI's comments today

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1 can be allowed to interfere with the pursuit of all of
2 the facts that this Inquiry is intent on achieving.

3 To turn to the Inquiry dates, my Lady. Scottish
4 Bereaved are grateful for the update from the Inquiry
5 legal team on Rule 9 letters of disclosure in relation
6 to Module 2 and we note that, as a result of the
7 postponement of Module 1, Module 2 will now take place
8 from 2nd October 2023 until 7th December 2023, although
9 we note these dates are still provisional in line with
10 the comments made by counsel to the Inquiry earlier.

11 Your Ladyship already has our submissions on
12 Parliamentary privilege and it is not necessary to
13 repeat them here today. However, we accept that ...

14 **BARONESS HALLETT:** I don't know if you can hear me,
15 Mr McCaffrey, but your screen is frozen.

16 **MR KEITH:** My Lady, we appear to have lost him. I wonder
17 whether you want to consider electronically rising. Oh
18 no, we're back.

19 **MR McCAFFREY:** I do apologise. Hello, my Lady. I hope you
20 can hear me now.

21 **BARONESS HALLETT:** We can, thank you, Mr McCaffrey.

22 **MR McCAFFREY:** Sorry, just a glitch in my internet
23 connection.

24 I think I had got just to the Inquiry dates,
25 my Lady, and I hope you heard what I had to say before

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1 are noted and we will refer to any further clarification
2 on that point that we may seek.

3 We note that in Module 2 the Inquiry will look
4 into core political and administrative governance and
5 decision-making for the whole of the UK, which we submit
6 is directly relevant to the revelations of last night in
7 connection with the WhatsApp messages being disclosed
8 and already referred to. Module 2A will of course look
9 at matters from a Scottish perspective and we now have
10 had the opportunity to read the memorandum of
11 understanding agreed between your Ladyship and the
12 Scottish Inquiry Chair, Lord Brailsford, in relation to
13 the conduct of the Scottish and UK Inquiries which was
14 made available to us on 23 February.

15 We note that both Inquiries commit to providing
16 clarity about how each will discharge its terms of
17 reference, minimising duplication and maximising value
18 to the public purse, and that the practical steps
19 necessary are being put in place to achieve those ends.

20 Scottish Covid Bereaved ask that we will be
21 updated in respect of any substantive decisions that are
22 taken in the way that the Inquiries intend to interact,
23 including the way in which evidence and documents will
24 be shared. We again appreciate counsel to the Inquiry's
25 comments in that regard this morning.

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1 We note from counsel to the Inquiry this morning a
2 request for a statement and materials associated
3 therewith has been made to the First Minister of
4 Scotland. As referred to by Ms Campbell of Northern
5 Ireland Covid Bereaved Families for Justice, we trust
6 that further requests will be sent to those other
7 ministers in the Scottish Cabinet and their advisers in
8 due course. However, we also accept that this is
9 perhaps a decision that will be taken with reference to
10 and in conjunction with the Scottish Inquiry and
11 included in Module 2A of the UK Inquiry.

12 We further acknowledge and appreciate the
13 clarifications of your Ladyship and counsel to the
14 Inquiry this morning as to the proposed newsletter and
15 webinar which will provide further detail of how the
16 Every Story Matters Listening project is to be
17 progressed. Also to counsel to the Inquiry for
18 addressing the perceived issues surrounding those
19 companies which may be involved in the operation of that
20 exercise.

21 Again, and as previously submitted, members of
22 Scottish Covid Bereaved will have suggestions on how
23 this might be best achieved and welcome the opportunity
24 to attribute to the process.

25 We are also grateful to the Inquiry for reflecting

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1 Further, and in line with our position in
2 submissions for Module 3 yesterday, we once again
3 acknowledge and adopt the submissions of those other
4 Core Participants with regard to the specific issues
5 arising in relation to structural racism and ethnicity.
6 We welcome both your Ladyship's and counsel to the
7 Inquiry's comments in these regards this morning.

8 Unless I can be of any further assistance,
9 your Ladyship, those are the submissions on behalf of
10 Scottish Covid Bereaved.

11 **BARONESS HALLETT:** Thank you very much indeed, Mr McCaffrey.

12 In relation to the Scottish Inquiry, as you know,
13 I explained how Lord Brailsford and I and our two teams
14 have been working closely together, but I can assure
15 you, and I'm sure you would accept (Lord Brailsford is
16 still a serving judge in Scotland and I was a judge for
17 a long time) nobody is going to interfere with our
18 independence. So I can assure you we will be firmly
19 independent, both of us, in our different Inquiries.

20 As far as the other important matters you raise
21 are concerned, I can only imagine the impact on the
22 bereaved seeing the WhatsApp messages disclosed without
23 any kind of notice. As you know, it had nothing to do
24 with this Inquiry. But what I can do is assure the
25 bereaved that this Inquiry will make every possible

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1 our earlier request and indicating its intention to
2 minimise the impact on those who wish to participate in
3 both listening projects. We understand that our
4 previously voiced concerns that the UK and Scottish
5 Inquiries will not sit at the same time have been
6 accepted, and for Scottish Covid Bereaved that is an
7 important matter as clearly the group has a significant
8 interest in both Inquiries. However, it does not appear
9 that this has been specifically addressed in the terms
10 of the memorandum of understanding and Scottish Covid
11 Bereaved would welcome clarification on that point.

12 We note that both Inquiries will give
13 consideration to incorporating findings or
14 recommendations made by one Inquiry into the evidence of
15 the other to the extent that such has been arrived at by
16 the time required for the purposes of the other Inquiry.
17 This will enable us better to understand what is
18 proposed. Clearly, each of the Inquiries are separate
19 and requires to carry out its own investigations. While
20 we acknowledge that with co-operation between the two
21 Inquiries (which we hope will be time, effort and cost
22 saving,) Scottish Covid Bereaved will welcome the
23 assurance that each Inquiry will be properly independent
24 when it comes to the assessment of the evidence before
25 it.

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1 effort to ensure that we have investigated all the
2 messages and their context before we complete any kind
3 of examination of the role of the previous Secretary of
4 State for Health.

5 So we will also check the question you asked about
6 whether all Mr Hancock's records have been disclosed.
7 I think that probably covers most of the matters I can
8 deal with today but, if there are other matters, we will
9 get back to you with answers as soon as we can.

10 Thank you very much. Thank you, Mr McCaffrey.

11 It is now Mr Williams. Mr Williams, you are
12 there. Have you been having problems this morning?

13 **MR WILLIAMS:** I have, my Lady. I understand that I owe you
14 and the audience an apology for trying to intervene in
15 proceedings when I'd somehow cut myself off from the
16 proceedings themselves.

17 **BARONESS HALLETT:** Don't worry, Mr Williams. These things
18 happen to all of us and, as you know, I had to apologise
19 for a coughing fit. So don't worry.

20 **MR WILLIAMS:** Well, my Lady, I'm just sorry that I had to
21 reveal my incompetence with computers so early in these
22 proceedings. I was hoping it might come somewhere
23 towards the end.

24 **Submission by MR WILLIAMS, KC**

25 My Lady, I have introduced myself many times in

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1 these proceedings. I will just say I'm Lloyd Williams.
 2 I represent Covid-19 Bereaved Families for Justice
 3 Cymru. I'm going to try and avoid previous matters upon
 4 which I have commented and, insofar as is necessary,
 5 I adopt what's been said before me this morning and,
 6 once again, I'll try and avoid repeating it.

7 My Lady, I want to address you on the following
 8 matters: scope of issues to be covered in Module 2;
 9 Rule 9 requests; disclosure; expert witnesses; evidence
 10 proposals; procedure and Rule 10; and Every Story
 11 Matters and commemoration. You will no doubt be pleased
 12 to know that my comments in respect of all those
 13 headings are relatively short but there are matters that
 14 concern those we represent.

15 First of all, scope and issues. CBFFJ Cymru notes
 16 that the CTI proposes that a list of key witnesses who
 17 fall to be explored in the oral evidence of Module 2
 18 will be circulated in April 2023. It is noted that it
 19 is intended that this is to be done taking into account
 20 the aim of ensuring broad consistency of approach with
 21 modules 2A, 2B and 2C. CBFFJ Cymru agrees that
 22 considerations to the scope and compilation of the list
 23 of issues in Module 2 requires consideration of the four
 24 modules to ensure that key issues will be adequately
 25 covered, in particular, as to the communications between

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1 CBFFJ Cymru submits that the list of issues to be
 2 examined should also include: (a) whether any senior
 3 ministers considered or attempted to use the emergency
 4 powers contained within section 1 of the Civil
 5 Contingency Act 2004 to make emergency regulations.

6 (b) if no consideration was given to those powers
 7 why not?

8 (c) whether it was necessary to use these
 9 emergency powers to protect life, or whether the
 10 Government was right to wait for the Coronavirus Act
 11 2020 to go through Parliament via the normal route. In
 12 going through Parliament via the normal route whether
 13 any time was lost that might have been saved by using
 14 the powers already contained within the Civil
 15 Contingencies Act 2004 and, if so, in what way do they
 16 matter and the effect of that?

17 (d) whether the enactment of the 2020 Act impacted
 18 on the extent to which the devolved nations made their
 19 own decisions about emergency powers.

20 Further, my Lady, CBFFJ Cymru adopts and supports
 21 the proposal that was made at the first preliminary
 22 hearing in relation to Module 2 on behalf of the TUC
 23 that a short hearing be listed after the hearings of
 24 modules of 2A, 2B and 2C to take account of the lessons
 25 learnt from those modules in which it would be open to

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1 Governments and in order to ensure consistent approach.

2 CBFFJ Cymru notes that Module 2 includes in its
 3 provisional scope the following. Central Government
 4 structures and bodies concerned with the UK response to
 5 the pandemic, and their relationship and communications
 6 with the devolved administrations in Scotland, Wales and
 7 Northern Ireland and also regional and local
 8 authorities.

9 My Lady, CBFFJ Cymru submits that it would be
 10 important that the list of issues in Module 2 includes
 11 the following matters which fall within the above
 12 paragraph of provisional scope.

13 Firstly, to what extent was there a sharing of
 14 knowledge between Welsh and UK Governments? In
 15 particular scientific, medical and expert knowledge?
 16 Why did the actions taken or not taken by the Welsh
 17 Government differ from those taken by the UK Government
 18 or any of the other devolved Governments? The
 19 relationship of communication between the Welsh and
 20 UK Governments before and after January 2020 in relation
 21 to pandemic planning and response, including the
 22 frequency and quality of meetings. This should include
 23 requests made by the Welsh Government to the
 24 UK Government for additional funding and the efforts
 25 made to secure the same.

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1 Core Participants from Module 2 to make submissions on
 2 Module 2 with the benefit of reflecting on the evidence
 3 from all four modules. CBFFJ Cymru agrees this is
 4 likely to assist the Chair and the Inquiry in their
 5 work.

6 Rule 9 requests. CBFFJ Cymru welcomes the
 7 opportunity to indicate where it considers that an
 8 individual who does not appear in annex A but whose
 9 evidence would benefit Module 2 to be heard. It
 10 proposes that, if not already served, consideration of
 11 service of a Rule 9 request on the Director General of
 12 Covid-19 Crisis Co-ordination for the Welsh Government
 13 should be served and, if necessary, should be called to
 14 give evidence.

15 Disclosure to Core Participants. CBFFJ Cymru is
 16 grateful for the updating information as to the progress
 17 of disclosure CPs. CBFFJ Cymru requests that when a new
 18 tranche of disclosure is uploaded onto the database that
 19 an email is sent to CPs and their legal representatives
 20 to notify them. This has been the case for Module 1.
 21 Without such notification, it is difficult to know when
 22 new documents have been received and uploaded.

23 Expert witnesses. CBFFJ Cymru is grateful for the
 24 information about the sharing of draft expert reports
 25 with the CPs and welcomes the opportunity to raise

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1 points of clarification or additional information of
 2 relevant matters with each expert. CBFFJ Cymru looks
 3 forward to receiving further information as to how CPs
 4 can engage in this proceedings. It requests, my Lady,
 5 that there is sufficient time for CPs to give
 6 consideration to the draft reports before the time by
 7 which questions/new matters are to be raised.

8 My Lady, turning now to evidence proposed
 9 procedure and Rule 10. CBFFJ Cymru notes and welcomes
 10 the CTI's support for additional procedure referred to
 11 in paragraphs 47 and 48 of its note that CPs may be
 12 permitted to meet counsel to the Inquiry following the
 13 submission of their observations on the evidence
 14 proposal which is to be provided in respect of each
 15 witness to be called to give evidence, and so as to give
 16 the chance to better explain the rationale for the
 17 observations, an informal route to highlight the
 18 importance of the issues and why they then need to be
 19 raised with the witness.

20 CBFFJ Cymru suggest that in line with other public
 21 inquiries, there ought also to be a short period of time
 22 set aside after the CTI's questions so that further
 23 follow-up questions arising from the evidence can be
 24 considered by the CPs.

25 Finally, my Lady, in respect of Every Story

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Submission by MR METZER

1 **MR METZER:** My Lady, I appear on behalf of the Long Covid
 2 groups, together with my learned friends Ms Sivakumaran
 3 and Ms Iengar. We are instructed by Bhatt Murphy
 4 Solicitors, as you are aware.

5 We were grateful to Mr Keith KC and his team for
 6 the clear indications in respect of the timetable and
 7 the plan for the way forward for Module 2 set out in his
 8 notes and oral submissions today. The assistance
 9 provided by Mr Keith KC and his team have obviated the
 10 need for detailed submissions from Long Covid groups
 11 today, and I have therefore focused only on a few
 12 matters of detail.

13 Long Covid and their interest in Module 2. Before
 14 turning to our submissions on procedural matters, we
 15 have two preliminary observations. Considering first
 16 the history of advocacy for recognition for Long Covid,
 17 you will recall at the first preliminary hearing the
 18 submissions advanced on behalf of the Long Covid groups
 19 setting out their concerns about being overlooked by
 20 Government decision makers and their formation to
 21 advocate for those with Long Covid. You will also
 22 recall that I addressed you on these issues yesterday as
 23 they related to the healthcare consequences of how the
 24 government and the public responded to the pandemic.

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1 Matters and commemoration, CBFFJ Cymru is grateful to
 2 the solicitor to the Inquiry for the update as to both
 3 those matters and very much welcomes the work to be done
 4 in both areas, and the opportunity to continue working
 5 with the Inquiry team to assist in the development of
 6 Every Story Matters.

7 My Lady, those are my submissions.

8 **BARONESS HALLETT:** Thank you very much, Mr Williams, as
 9 constructive as ever. You've raised some interesting
 10 questions and made some interesting points and I'm sure
 11 that counsel to the Inquiry team are very much making
 12 a note of them. So thank you again.

13 I'm sorry about your problems earlier. Don't
 14 blame yourself. These things happen to everybody
 15 including, on one call I did, a professor of computer
 16 science. So it can happen to everybody. Thank you very
 17 much indeed. We will break now for lunch and return at
 18 2.00, please.

19 (1.00 pm)

(The luncheon adjournment)

20 (2.00 pm)

21 **BARONESS HALLETT:** Right, I think it is now an opportunity
 22 for Mr Metzger to address the Inquiry.

23 **MR METZER:** Thank you, my Lady.

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1 As I also mentioned yesterday, it has been
 2 suggested that "Long Covid is the first illness to be
 3 made through patients finding one another on Twitter and
 4 other social media". The etymology of the term "Long
 5 Covid" can be traced to social media posts in May and
 6 June 2020. Patient advocacy has played an integral part
 7 in the recognition of and response to Long Covid.

8 You will be aware of the Long Covid groups'
 9 advocacy for better recognition for and understanding of
 10 Long Covid, as set out in their responses to the Rule 9
 11 questionnaires, and there is evidence and examples in
 12 our written note. Their interest in participating in
 13 this module is derived from their experience and
 14 concerns that the administrative and Government decision
 15 makers failed to have regard to Long Covid when making
 16 decisions in relation to the Covid-19 pandemic.

17 Long-term sequelae from Coronavirus infections and
 18 other infectious decisions were not unknown before
 19 Covid-19, and yet there was neither urgency in planning
 20 to respond to long-term sequelae for Covid-19 nor in
 21 responding to reports of Long Covid when they arose in
 22 summer 2020. It was left to people with Long Covid to
 23 advocate on their own behalf. The experience of those
 24 living with Long Covid and advocating for its
 25 recognition was a crucial element to the narrative of

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1 the administration and Government decision making on
2 Covid-19.
3 There is a novel and important opportunity for the
4 Inquiry and the wider community to learn from the
5 experiences of patient advocacy groups in a pandemic in
6 relation to the long-term sequelae of infectious
7 diseases. The lessons to be learned from the Long
8 Covid's groups' experiences during the Covid-19 pandemic
9 will have relevance to any Government decision making in
10 response to a future epidemic or pandemic.

11 Secondly, we endorse the calls from other Core
12 Participants to the Inquiry to consider structural
13 discrimination and racism across all modules of the
14 Inquiry, including Module 2. As Mr Keith highlighted
15 this morning, Covid-19 has had a disproportionate impact
16 on different ethnic groups and disabled people. The
17 statistics speak for themselves. We welcome the
18 Inquiry's commitment to investigate inequalities as set
19 out by Mr Keith this morning. However, inequalities
20 cannot be fully understood without fully considering
21 structural and systemic factors driving those
22 inequalities. To put it in common parlance, there is
23 a risk of not seeing the wood from the trees. We do not
24 seek to repeat submissions which have already been made
25 on this matter but would strongly encourage the Inquiry

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1 In respect of the Rule 9 process, the Long Covid
2 groups have sought greater clarity about the Rule 9
3 process in order to ensure effective assistance to the
4 Inquiry. We are grateful for the indication from
5 Mr Keith that the Inquiry is considering the Long Covid
6 groups' responses to questionnaires and whether to send
7 a further request for a witness statement. We would be
8 assisted if the Inquiry was able to provide an earlier
9 indication as to whether Long Covid groups are likely to
10 receive a further request for substantive witness
11 statements.

12 The Long Covid groups note the Inquiry's approach
13 to evidence gathering through initial questionnaires
14 issued pursuant to Rule 9, and welcome the indication
15 from Mr Keith that relevant witnesses are now being
16 asked about whether they took into account the risk of
17 Long Covid when considering NPIs.

18 Although we are concerned that this was not
19 considered earlier, the early disclosure of the list of
20 issues will help identify if there are any other key
21 areas related to Long Covid that the Inquiry has
22 overlooked. We underscore that the Government and
23 administrative decision maker's perspective provides
24 only one facet of the context in which decisions were
25 made. The experiences of those living with Long Covid

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1 to consider this issue with an open mind.

2 With these provisional observations in mind,
3 I wish to briefly address some of the procedural
4 matters. We have made detailed submissions in our
5 written notes and I do not intend to repeat those
6 submissions now unless there are any matters on which
7 you would require further submission.

8 Witness list timetable and Rule 9 process. The
9 Long Covid groups have raised the Rule 9 process with
10 the issues of witness lists and timetabling, as they are
11 interlinked. The Long Covid group support Mr Keith's
12 helpful commitment to providing a list of issues in
13 April 2023 and to sharing a provisional list of
14 witnesses shortly thereafter, in recognition that Core
15 Participants' early observations will assist the chair
16 and her team.

17 In relation to timetabling, we note Mr Keith's
18 proposal for a further preliminary hearing to be held
19 before September 2023 and possibly in July, following
20 submissions from other Core Participants. We strongly
21 support the suggestion that the preliminary hearing be
22 scheduled considerably earlier and no later than the
23 summer break, in order to iron out any outstanding
24 issues and ensure the revised start date of October is
25 wholly achievable.

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1 and advocating for its recognition provides a crucial
2 element to the narrative of administrative and
3 Government decision-making on Covid-19. They
4 respectfully suggest and urge that it is necessary to
5 hear further evidence from Long Covid groups to provide
6 a complete picture of events from Module 2.

7 The Long Covid groups make these early
8 observations in advance of any draft witness list in
9 order that they can fully understand the Inquiry's
10 approach to evidence gathering whilst there is
11 an opportunity to substantively assist the Inquiry. As
12 Mr Keith observed, the Inquiry is moving at great pace,
13 and they would welcome an early opportunity to assist
14 the Inquiry with a provision of further evidence.

15 Experts. In relation to experts, the Long Covid
16 groups have three core observations. First, the Long
17 Covid groups welcome the indication that draft reports
18 for the four experts in Module 2 will be shared in
19 March 2023. They appreciate that the Inquiry team has
20 been working at pace and that this early disclosure of
21 reports is evidence of considerable effort on the part
22 of the Inquiry to be prepared for the Module 2 hearings.
23 The Long Covid groups also anticipate contributing
24 a limited number of observations to the draft reports
25 when they are disclosed.

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1 Secondly, the Long Covid groups will be assisted
2 by the early formal disclosure of Module 1 reports which
3 relate to Module 2. We welcome those parts of the
4 reports of the experts related to health inequalities in
5 Module 1, Professor Marmot and Professor Bambra being
6 considered for disclosure in this module. It is
7 necessary for Core Participants who are not in Module 1,
8 including our clients, to understand the opinions of the
9 experts opining on preparedness and on what should have
10 been in place at the time of the pandemic to understand
11 the quality of the decisions then subject to review in
12 Module 2.

13 It is respectfully requested that all the Module 1
14 expert reports be disclosed to Core Participants in
15 Module 2 in full and at an early stage. While the
16 reports will, as Mr Keith reminded us this morning, be
17 published at the time of the Module 1 hearing, given the
18 pace the Inquiry is progressing at, Core Participants in
19 Module 2 would be considerably assisted by understanding
20 the expert views in relation to Module 1 as they pertain
21 to Module 2 in good time to advance preparation for
22 Module 2.

23 Finally, the Long Covid groups recognise
24 Mr Keith's recognition that multiple epidemiologists
25 will be called in Module 2. However, we respectfully

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1 they gave to the Government during the pandemic. Their
2 witness statements will not be sufficient, in our
3 submission, to address this gap in evidence in Module 2,
4 as first they will be motivated to defend the advice
5 without recognising any oversights or mistakes in
6 approach. And secondly, they do not have the same
7 duties to the court.

8 In addition, an expert report will provide
9 a framework explanation of approaches to pandemics which
10 will provide the context necessary to understand the
11 evidence of individual experts on the advice given in
12 SAGE and other relevant forums. From the perspective of
13 Long Covid groups specifically, the Inquiry may well be
14 assisted by an expert who specialises in the study of
15 long-term sequelae, their characterisation in a pandemic
16 context, and developing research methods and responses
17 to them.

18 The Long Covid groups are currently considering
19 a number of individuals to propose in this regard and
20 will follow up with the Inquiry by correspondence in the
21 spirit of assisting the Inquiry.

22 Parliamentary privilege. The Long Covid groups
23 have noted the observations made in respect to
24 parliamentary privileges in CTI's note in advance of the
25 second preliminary hearing and my Lady's ruling of

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1 suggest that they will be witnesses of fact and do not
2 replace the need for expert evidence. It will be of
3 assistance to the Inquiry, in our submission, to seek
4 expert reports from public health experts and
5 epidemiologists on their opinions on the development of
6 the pandemic and advice on responding to the different
7 stages of the pandemic.

8 Whilst recognising that the focus of this module
9 is on administrative and Government decision making,
10 those decisions can only be properly understood in the
11 context of what advice was being given and the
12 appropriateness of following that advice. In our
13 submission, this is no different from the approach to
14 Module 1 where expert reports have been obtained to
15 explain, for example, matters of resilience and risk
16 management and the suitability of those structures.
17 Currently the expert advice that has been sought is the
18 exclusive preserve of political scientists and, while
19 important in its own right, we consider it would not be
20 of assistance in understanding whether the advice given
21 to administrative and political decision makers was
22 appropriate.

23 The Long Covid groups appreciate that the leading
24 epidemiologists in the UK will be giving evidence as
25 witnesses of fact in Module 2 in respect of advice that

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1 17 February 2023 following the second Module 1
2 preliminary hearing. The Long Covid groups do not,
3 therefore, seek to make any observations at this stage,
4 and reserve the right to make submissions on the
5 application of parliamentary privilege at a later date.

6 Rule 10, the Long Covid groups welcome CTI's
7 proposal of a staged process to afford Core Participants
8 "a meaningful opportunity to engage in the process" of
9 gathering evidence from witnesses. We endorse and
10 support the submissions made by the bereaved families of
11 Core Participants to be permitted to ask their own
12 questions of witnesses and submit that this can be
13 managed in a proportionate way.

14 The only additional observation that the Long
15 Covid groups make is that the Inquiry consider
16 reasonable adjustment for Long Covid groups when setting
17 deadlines for responses. I will not repeat the general
18 submission on reasonable adjustments raised yesterday at
19 the preliminary hearing for Module 3. I rely on those
20 submissions and, in the same vein, invite the Inquiry to
21 provide Core Participants with at least 14 days to
22 respond to the evidence proposals.

23 Relativity. During the second preliminary hearing
24 for the Module 1 hearing, Mr Keith indicated that the
25 Core Participants "persuaded the Inquiry team to alter

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1 the field tagging system so that documents can be marked
2 with additional fields". The Long Covid Groups apply
3 for similar permission to be granted to them on their
4 Relativity workspace so that they can have a coding
5 panel installed. This will facilitate the team's review
6 of what is anticipated to be a significant volume of
7 disclosure. We appreciate from Mr Keith's comments this
8 morning that this permission may be forthcoming in any
9 event.

10 Commemorations and listening exercise in Covid-19
11 safety measures. I have addressed you already in
12 relation to the listening exercise and commemoration and
13 the Covid-19 safety measures at the preliminary hearing
14 for Module 3 yesterday and therefore do not need to
15 repeat those submissions today.

16 In conclusion, the Long Covid groups remain
17 willing to assist the Inquiry with their investigations
18 at all stages.

19 That is all I wish to say, unless there is any
20 matter I can assist my Lady with. Thank you.

21 **BARONESS HALLETT:** Thank you very much, Mr Metzger, and I'm
22 very grateful and welcome the offers of assistance. As
23 ever, your remarks were well made and I will bear them
24 very much in mind. I know that the Inquiry team will as
25 well. Thank you.

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1 carers lacking unprotected equipment or otherwise being
2 untested.

3 All of which were compounded by lack of accessible
4 communication and information. Fundamentally the
5 political and administrative response to the pandemic
6 has excluded disabled people. Either no thought has
7 been given to them or thought given has been inadequate
8 or too late.

9 My Lady, there are around 40 million disabled
10 people living in the United Kingdom. The full impact of
11 the pandemic and the political and administrative
12 response to it upon disabled people cannot be fully
13 understood without some appreciation of their situation
14 as at the beginning of the crisis. On almost every
15 metric the lives of disabled people are what the
16 Equality and Human Rights Commission calls "a journey
17 less equal". Disabled people overall have lower
18 educational attainment, lower employment and pay rates,
19 suffer greater levels of poverty and significant levels
20 of abuse, social isolation and stigmatisation.

21 In 2016 a House of Lords select committee
22 published a ground-breaking report that identified the
23 unequal impact of the Equality Act 2010 on disabled
24 people. In consideration of inequalities, the needs of
25 disabled people were too often an "afterthought". For

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1 Next I think we have Mr Friedman.

2 **Submission by MR FRIEDMAN, KC**

3 **MR FRIEDMAN:** Good afternoon, my Lady.

4 Myself, Anita Davies and Shamik Dutta of Bhatt
5 Murphy represent Disability Rights UK, Inclusion
6 Scotland, Disability Wales and Disability Action
7 Northern Ireland. They make up before you the disabled
8 people's organisations that I will call DPO.

9 The Inquiry has reached the point of making
10 important process-related decisions about what evidence
11 to obtain, which witnesses to call and how to examine
12 them.

13 The DPO want certain realities that affected the
14 people they work with to be borne in mind by the Inquiry
15 when making those decisions.

16 Contrary to some of the public discourse, the
17 virus and its response did discriminate. Covid-19 posed
18 a drastically higher risk to life and risk of harm to
19 specific population groups of which disabled people were
20 one. Furthermore, for disabled people in particular the
21 consequences of state intervention to manage the virus
22 were fundamentally more negative. These consequences
23 included food and resource scarcity, isolation from
24 essential services, and being put at risk of contracting
25 the virus, for instance in care homes or from home

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1 the future action, the report's five major themes were:
2 (1) reverse that afterthought syndrome; (2) plan
3 proactively; (3) communicate better by engagement,
4 listening and taking into account disabled people's
5 views; (4) make rights more accessible and enforceable;
6 and (5) structure Government more effectively in order
7 to discharge its responsibilities and to secure
8 dedication to lasting change.

9 In 2017 the influential United Nations Committee
10 on the Rights of Persons with Disabilities issued its
11 first report on the UK. Of its many criticisms it found
12 serious deficiencies highly pertinent to this Inquiry,
13 including a lack of consultation with disabled people on
14 policy and legislation that impacted on their lives,
15 ill preparedness to protect them in the events of
16 emergency, damage done by austerity measures, and a lack
17 of reliable data, including impairment-specific and
18 other disaggregated intersectional data.

19 In a separate investigation report which focused
20 especially on matters of structural discrimination
21 arising from austerity measures, the Committee concluded
22 that:

23 "... there is reliable evidence that the threshold
24 of grave or systematic violations of the rights of
25 persons with disabilities has been crossed in the State

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1 party."

2 The treatment of disabled people as
3 an "afterthought", if at all, is one of the essential
4 features of a disabling society. The social model that
5 informs our clients' perspective, organisation and
6 advocacy is that essential injustices of being disabled
7 are the product of socially constructed barriers and
8 attitudes. For them, the significant issue in the
9 fusion of science and Government that generated Covid
10 policy is that none of it contained disability
11 specialists, service providers, subject matter experts
12 or end users. Disabled people were and are all too
13 often subsumed into other categories such as care homes,
14 the vulnerable or the elderly. Our clients complained
15 in real time that their voices were being, as Disability
16 Action put it, lost in the noise or ignored.

17 That disabled people were significantly more
18 likely to die from Covid-19 was in due course recognised
19 by some as was a disproportionate impact of lockdown
20 upon disabled people. But the disclosure thus far
21 strongly suggests that the official acknowledgement of
22 and response to these key issues was either belated or
23 insufficient. This was a basic failure of human
24 accounting.

25 There are tools, my Lady, available in
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1 regard to emergency and disaster management.

2 The obligation that disabled people must be
3 included in law and policy making, to collaborate in
4 their co-design and co-production, is central to the
5 Convention and derives from the original disability
6 rights demand of "Nothing about us without us".

7 The UN Committee on the Rights of Persons with
8 Disabilities takes as its starting point that disabled
9 people have long been and indeed still are denied
10 involvement in decision making about matters relating to
11 or affecting their lives. The corrective lies
12 especially in consulting the representative
13 organisations run by disabled people not just for them.
14 The DPO say that that should have happened more during
15 Covid-19. It is of overall benefit to the well-being of
16 society if it can happen now.

17 The UNCRPD endorses a social model. Article 1
18 defines persons with disabilities to include those who
19 have long-term physical, mental, intellectual or sensory
20 impairments which, in interaction with various barriers,
21 may hinder their full and effective participation in
22 society on an equal basis with others. Various articles
23 concerning awareness raising and accessibility
24 underscore the extent to which disability is a form of
25 structural and attitudinal discrimination. Additional

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1 international human rights law to understand what
2 happened to disabled people during the pandemic and how
3 to transition out of it and build back better. The DPO
4 highlight that at this preliminary stage because they
5 will assist the Inquiry in charting its own course in
6 relation to matters like expert witness selection and
7 questioning, and avoiding the errors of exclusion that
8 characterised the Covid response.

9 The UK has signed and ratified the United Nations
10 Convention on the Rights of Persons with Disabilities,
11 the UNCRPD. Most immediately relevant to this Inquiry
12 is Article 11, which expressly requires:

13 "... all necessary measures to ensure the
14 protection and safety of persons with disabilities in
15 situations of risk, including situations of ...
16 humanitarian emergencies and the occurrence of natural
17 disasters."

18 In the development and implementation of
19 legislation and policies concerning persons with
20 disabilities, state parties are required to:

21 "... closely consult with and actively involve
22 persons with disabilities, including children ...
23 through their representative organisations."

24 The Committee's general comment No. 7 makes clear
25 that such consultation is particularly important with
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1 articles on women, children and adequate standards of
2 living, as well as references in the recitals to
3 disadvantages on grounds of race and ethnicity and
4 poverty, all recognise that disability discrimination
5 intersects with other forms of discrimination.

6 The UNCRPD also makes clear that disabled people
7 have different needs that derive from their impairments.
8 Whether it be healthcare or education. However, as with
9 all other human rights treaties, respect for the
10 inherent dignity of the human being is the core value
11 through which all other rights must be understood.
12 Dignity is referred to three times in the preamble and
13 in six of the substantive articles. It is the treaty's
14 core purpose in Article 1 to promote respect or inherent
15 dignity, and in the first of its general principles of
16 interpretation in Article 3(a), being respect for
17 inherent dignity, individual autonomy, including the
18 freedom to make one's own choices, and independence of
19 persons.

20 The preeminent place of dignity in the UN
21 convention provides an essential way into understanding
22 Covid decision making. However much the calls to aid
23 the vulnerable during lockdowns may have been well
24 meant, the discourse of vulnerability is problematic.
25 It undermines the long-term aim of the DPO to mainstream

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1 societal understanding that impairment is not a tragic
 2 weakness requiring pity, still less disability should be
 3 understood as something which requires charity, welfare,
 4 special pleading or ableist sacrifice before the
 5 situation of disabled people is granted recognition.
 6 Instead, the convention requires in its Article 3(d):
 7 "Respect for difference and acceptance of persons
 8 with disabilities as part of human diversity and
 9 humanity."
 10 The DPO question whether UK Government and society
 11 has yet been able to do that and how it might fare
 12 better in the future. Preparation for Module 2 should
 13 bear that question in mind.
 14 That leads to expertise and experts. Regarding
 15 Covid's implications for disabled people, the principal
 16 problem with expertise is that for a long time there
 17 simply was none; and none of the experts within the SAGE
 18 structure, or those in Government who procured their
 19 advice, thought to point that out. Of the initial
 20 disclosure from the SAGE personnel, it appears that it
 21 only belatedly became apparent that core gaps in expert
 22 advice, in particular an absence of service providers
 23 and end users who would understand the impact of
 24 decision making on ordinary lives. Initially Government
 25 also failed to incorporate such perspectives.

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1 An issue for Module 2 is how much and in what way
 2 were those aspects of human predicament considered at
 3 central Government level. In terms of the chosen
 4 subject matter, the commission of reporting in Module 2,
 5 the DPO are able to make the following general
 6 observations at this stage. They do so because it may
 7 be relevant to the scope of the expert reporting but
 8 also because it will be relevant to the selection and
 9 questioning of other witnesses whose evidence overlaps
 10 with what experts may deal with.

11 First, we ask the Inquiry to make available
 12 Module 1 reports to Module 2 Core Participants as soon
 13 as possible, as has been asked by others, because, like
 14 Module 1 itself, they provide context for understanding
 15 the decision making to be examined in Module 2. The
 16 Long Covid groups and others have raised this and
 17 Mr Keith gives some assurance today. What we would
 18 like, knowing that they will be disclosed publicly in
 19 due course to everyone, is to get them early for our
 20 timely preparation. That is important for four reasons:

21 (1) the reports will be significant reference
 22 points for the Inquiry in determining future lines of
 23 investigation going forward.

24 (2) Module 2 witnesses will be asked about their
 25 awareness and/or views of a matter raised in Module 1

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1 Even when SAGE sought to correct the problem by
 2 including public health and discrimination experts, they
 3 focused on other specifically impacted parts of the
 4 population such as ethnic minorities, children and the
 5 elderly rather than disabled persons.

6 In the instruction of its own experts and their
 7 questioning in due course, the Inquiry is asked to
 8 consider this failure of due regard. Part of the gap in
 9 expertise can now be filled with the DPO as Core
 10 Participants. They. In the reports they have cited,
 11 show the absence of expert advice and consultation
 12 resulted in failures of foresight of some of the most
 13 isolating and resource impoverishing experience of
 14 lockdown, for instance food and resource scarcity, that
 15 led to hunger and degrading treatment, absence of or
 16 limited provision of physical care for disabled people
 17 and cessation of respite and day care services. The
 18 lack of regard for disabled people's caring obligations
 19 for others, insufficient access to information or lack
 20 of communication, the negative aspects of face masks in
 21 terms of health and/or barriers to communication,
 22 inadequate protection of individuals in social care
 23 settings, and the exacerbation of pre-existing race,
 24 gender and socio-economic inequalities in society and
 25 their consequence for health, employment and poverty.

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1 reports.

2 (3) the DPO have an obvious interest in the
 3 matters to be reported upon by Professor Sir Michael
 4 Marmot and Clare Bambra relating to health inequalities
 5 and public health structures, and Bruce Mann and
 6 Professor David Alexander regarding the civil
 7 contingency system insofar as it was set up to risk
 8 assess and how much it was ready to respond to their
 9 situation.

10 The DPO of course recognise the necessity to split
 11 the Inquiry into modules but, as indicated in my opening
 12 remarks, it is important that the context of the
 13 disabled people's situation is appreciated as part of
 14 the Module 2 investigation.

15 Turning then to the areas of expert reporting that
 16 you described in your update notes. First, data
 17 collection and its use and Gavin Freeguard. That
 18 instruction will presumably help to investigate the
 19 truism that statistical modelling in aid of policy
 20 making is only as good as the data it is based upon.
 21 The DPO draw attention to Article 31 of the United
 22 Nations convention. It requires disability data
 23 collection, including the acquisition of
 24 impairment-specific data. As I have said, the UK was
 25 criticised by the UN committee for its lack of a unified

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1 data collection system and the limited collection of
2 disaggregated and intersectional data in surveys and
3 censuses on the general population.

4 The Rule 9 statements of the DPO make the same
5 point. If gaps in data affected modelling and policy,
6 then Mr Freeguard and other witnesses should be asked to
7 consider accessibility of data concerning disability and
8 various impairments, including its intersection with
9 other protected characteristics. If there were
10 deficiencies in the data, how much was this accounted
11 for, if at all? Was the collection and use of data too
12 focused on numbers and not enough on provision and end
13 user experience? And if the criticism turns out to be
14 correct, what are the reasons for the UK's failure to
15 create a useful and aggregated data system relating to
16 disabled people, including those with such other
17 protected characteristics.

18 The second --

19 **BARONESS HALLETT:** Mr Friedman, I'm sorry, I apologise for
20 interrupting, and you have been making some extremely
21 important points, and that's another reason I didn't
22 interrupt, it is just that you are almost reading word
23 for word the written submissions, and I have read them.
24 We all have read them very carefully. And given the
25 number of people who wish to speak this afternoon,

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1 how they monitored it differently. And that will be
2 an important compare and contrast going forward.

3 Finally, on the matter of transnational
4 comparisons, and that will be dealt with by Thomas Hale,
5 we understand that's going to be a mechanism for the
6 Inquiry to comply with its own terms of reference to
7 consider international practice so far as is reasonable.
8 What we say about that, and following on an address
9 that has already been made in relation to the World
10 Health Organisation as regards Module 1, is that the
11 World Health Organisation did issue guidance, as did the
12 United Nations General Secretariat, on dealing with
13 disabled persons during the pandemic, and consideration
14 should be given as to how much that guidance was dealt
15 with in other countries and whether there were better
16 practices and better means of protecting the interests
17 and rights of disabled people.

18 My Lady, that's what we say on experts.

19 It does follow from all that I have said on that,
20 and dealing with the issues that have been drawn to your
21 attention by others, that we do support the cause for
22 the Inquiry and all experts to focus on structural
23 discrimination, which includes race, gender, age,
24 childhood and comparative poverty. Such features are
25 valuable to consider in their own right and, as

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1 I just wonder if it was possible for you to be able to
2 highlight the other points you wanted to make on process
3 as opposed to the background to how disabled people felt
4 about their treatment during the pandemic and before?

5 **MR FRIEDMAN:** My Lady, I'm grateful for that indication, and
6 of course I will.

7 Let me just deal with it then briefly, just to
8 finish this section, on those that you have identified.
9 With regard to the machinery of Government expert, and
10 that which will be dealt with by Mr Alex Thomas, what we
11 apprehend is potential overlap with that which will be
12 dealt with by Bruce Mann in Module 1. The Inquiry has
13 indicated for Module 1 purposes it will look at it at
14 a higher level of generality. But what will follow
15 through, we submit, with Module 2 and Mr Thomas's
16 reporting is the extent to which recommendations which
17 were made to plan specifically around disabled people in
18 the advent of an emergency decision-making were followed
19 through, and if there were deficits, were they known
20 about and how were they filled.

21 My Lady, that then leads to the question of
22 devolved Government. You will have seen what we said.
23 Our submission is that that should be focusing to the
24 specific extent to which devolved Governments understood
25 the issues in relation to disabled people differently,

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1 intersecting factors in the lives of disabled people,
2 they can be structurally excluded by cultural values and
3 attitudes on those matters, in addition to social
4 barriers and exclusion arising from attitudes to
5 disability.

6 Going forward, we respectfully submit that you can
7 investigate these issues in a combination of four ways.
8 You can ask the Core Participants and other witnesses.
9 You can ask your instructed experts. If they don't
10 know, you need to consider instructing subject matter
11 experts who do. And in any event you should read the
12 most relevant landmark reports that have been written on
13 the subjects.

14 In addition, we await the Chair's decision, your
15 decision, as to whether you ought to be assisted by
16 assessors, and the Prime Minister's decision as to which
17 panel members ought to be appointed.

18 Can I turn to selecting and questioning witnesses.
19 Given the volume of disclosure that is being produced,
20 we understand that CTI want time to reflect on which
21 witnesses should give live evidence and what the issues
22 should be, and we have heard the dates suggested there
23 of April. Of course, informed consultation cuts both
24 ways, and with that in mind the DPO have tried to
25 identify on their own some provisional issues and

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1 questions and some documents to rely upon. To that we
2 add the following.

3 First, there is good reason for the Inquiry to
4 consider calling Core Participant witnesses from the
5 civil society groups, especially those involved in
6 trying to influence administrative and political
7 decision making in real time.

8 Second, the DPO acknowledge the instruction of
9 Rule 10 of the Inquiry Rules and CTI's suggested
10 approach if their note that aims to suggest that CPs are
11 meaningfully engaged in the process of prepared
12 questioning.

13 Our caveats concern timing and flexibility to
14 ensure that the approach evolves into the best version
15 of itself. Evidence proposals will need time to digest,
16 they should not be treated as inflexible pleadings.
17 15-minute breaks at the end of each witness should
18 always occur. And if issues can be discussed before
19 September, they should be, which is why we join others,
20 and seemingly Mr Keith himself, in wanting another
21 preparatory hearing before the end of the summer months.

22 Third, you have asked us to consider what
23 additional Rule 9 request you might issue and we suggest
24 at this stage the Care Quality Commission. That is not
25 least because they would have been in consultation with

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1 consequences, a fair balance has been struck between the
2 rights of the individual and the interests of the
3 community.

4 The final generic type of question is about
5 lessons learned. And in keeping with the aims and
6 structure of the Inquiry, that we do not understand to
7 be planning a separate recommendations module, at least
8 at present, witnesses need to be asked what they have
9 learned and how they would do things differently. And
10 the Rule 9 approach to this issue, as already
11 exemplified by the questions put to the SAGE witnesses,
12 essentially incorporates what worked and what could work
13 better, and we submit respectfully that should be
14 developed in oral questioning.

15 Of the remaining process issues, may I mention
16 then briefly parliamentary privilege and reasonable
17 adjustments. On Article 9 of the Bill of Rights 1689 we
18 have taken the approach that even if it does apply, it
19 would not prevent us from referring to parliamentary
20 reports and other statements as a matter of record, of
21 what was said in them. Also, it is open to any party to
22 do that as a means to establish with the Inquiry the
23 arguable relevance of issues, proposed questioning,
24 further requests for disclosure and potential
25 recommendations, all of which can be done without, in

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1 central Government on core issues.

2 Fourth, there are certain types of generic
3 questions that have a very proper relevance to this
4 Inquiry, of which we have highlighted three. Unlike
5 a trial or other legal process, it is intrinsic to the
6 nature of this particular inquiry to take an interest in
7 hypothetical questions. For example, what if lockdowns
8 had started earlier? How could exceptions to social
9 isolation regulations have operated for those in
10 specific categories of needs? We say, perhaps like no
11 other inquiry before it, this should be a forum that
12 embraces the virtue of hypothetical questions.

13 To those can be added questions concerning
14 proportionality of a measure. Human rights law provides
15 a well known fourfold template of such questioning that
16 does not need to be followed slavishly but helps to
17 structure the interrogation of difficult choices.
18 My Lady will know it very well but it may be important
19 to speak about it just a moment in the hearing.

20 It asks of a measure: (1) whether its objective is
21 sufficiently important to justify the limitations of
22 a fundamental right; (2) whether it is rationally
23 connected to the objective; (3) whether a less intrusive
24 measure could have been used; and (4) whether having
25 regard to these matters and to the severity of the

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1 the words of Article 9, questioning or impugning the
2 contents of those sources.

3 We've done that in our written submissions, but to
4 that end the DPO would especially draw the Inquiry's
5 attention to the Women and Equalities Committee report
6 of December 2020, entitled *Unequal impact? Coronavirus,*
7 *disability and access to services.*

8 There is good reason for it to be placed on the
9 Relativity platform along with the other core
10 parliamentary reports of the period that are already
11 there.

12 As to reasonable adjustments, the DPO made
13 submissions at the previous module to here in October
14 regarding suggested approaches to Inquiry proceedings.
15 That remains our clients' thinking and we look forward
16 to the Inquiry's proposal on that.

17 Can I make four general observations. First, the
18 provision of a British Sign Language communicator for
19 preliminary and evidential hearings on the YouTube
20 screen would be an important adjustment, including for
21 those who understand sign language but do not
22 necessarily read subtitles or transcripts.

23 Second, on top of the suggestions we've already
24 made, we support the Long Covid groups and others who
25 have made submissions that steps should be take to

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1 ventilate and otherwise make safe Inquiry venues.

2 Thirdly, as regards the practicalities of Every
3 Story Matters, it will be important that the people and
4 organisations appointed to run the projects are
5 appropriate to be involved in what on any view will be
6 an extraordinarily sensitive endeavour, coupled with
7 that the Inquiry is asked to consider and clarify how
8 the listening exercise will be accessible to disabled
9 people.

10 Fourth, and overall, in its process and in its
11 content this Inquiry is in a position to aim for a gold
12 standard of disability inclusion that others can then
13 follow.

14 Final, my Lady, Kamran Malik is the chief
15 executive of Disability Rights UK, who make up one of
16 the four organisations that we act for today. He speaks
17 for all of them when he says that disabled people know
18 from long experience that Government all too often sees
19 them as a cost never an asset of value and worth. He
20 adds:

21 "We are not seen as an investment in our country."

22 My Lady, that is part of the inescapable context
23 of the decisions that were made during Covid-19
24 pandemic. Those attitudes do not go away overnight.
25 You will have to decide how much damage they have done.

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1 oral submissions are shorter than they otherwise would
2 have been.

3 But we do feel the need to emphasise, whilst of
4 course acknowledging the enormity of the task you are
5 team faces, that engagement with our team is critical to
6 meet the still ambitious timetable that your Ladyship
7 has set, and we hope that this level of engagement does
8 continue going forward.

9 As we set out in our written submissions, there
10 are still a number of issues that we need to thrash out
11 regarding Relativity, and we have invited a short
12 meeting between the relevant members of your team and
13 Epiq to deal and iron out some of those outstanding
14 issues. I don't intend to address you on those today,
15 my Lady. You have our written submissions on Relativity
16 and I don't intend to repeat them, or to repeat all of
17 our written submissions generally, although of course we
18 do still rely on what is said in them. But I know that
19 you and the Inquiry team have them and will consider
20 them.

21 What I do want to do shortly today in the time
22 I have is to address the two main areas, and those are,
23 firstly, the scope of Module 2 and the list of issues
24 that was helpfully suggested by Mr Keith this morning,
25 and, secondly, to address you on the listening exercise.

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1 Thank you, my Lady.

2 **BARONESS HALLETT:** Thank you very much, Mr Friedman. You
3 have given the Inquiry a great deal of food for thought,
4 and I promise you and those you represent that I will
5 consider all the matters you put before us before in
6 writing and today extremely carefully. So thank you
7 very much indeed.

8 I think it is now Ms Twite.

9 **Submission by MS TWITE**

10 **MS TWITE:** Yes, thank you, my Lady.

11 My Lady, I represent the children rights
12 organisations, and they include Save the Children Fund,
13 Just for Kids Law, and the Children's Rights Alliance
14 for England. I'm instructed by Just for Kids Law with
15 pro bono support from Norton Rose Fulbright.

16 Can I start by giving two thank yous to your team.
17 Firstly to the operations team, who I know have been
18 working behind the scenes this morning to resolve
19 technical issues and have been of great assistance to
20 me. And secondly to your legal team, as in the past
21 couple of weeks there has been correspondence between
22 the children rights organisations and your legal team
23 and we have managed to resolve a number of issues
24 between us, which does mean that both our written
25 submissions to the Inquiry for today's hearing and my

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1 Before I come to those main points there are two
2 very short points about process that I wish to make.
3 Firstly, about Rule 9 requests. In company with others
4 we have previously requested disclosure of the actual
5 Rule 9 requests. We still do make that request but we
6 don't intend to repeat the submissions that we have
7 previously made upon that.

8 However, we have in correspondence and in our
9 written submissions requested for a number of other
10 ministers and other bodies to be sent Rule 9 requests.
11 We are grateful for the indication that from Mr Keith
12 that those suggestions are being considered. What we
13 ask is that we are informed as to whether or not those
14 requests have been acceded to, so we can understand the
15 reasons behind whether or not a certain body is
16 receiving a Rule 9 request that we suggested should do
17 and we can make further submissions if and where
18 appropriate.

19 I think I'm right in understanding from Mr Keith
20 this morning that no Rule 9 request has been sent to the
21 MOJ that is relevant to the scope of this module, of
22 Module 2. We did invite such a request to be made to
23 the MOJ, so if the Inquiry team are not intending to do
24 so, we ask that we be informed, that the course could be
25 done in the monthly update note, so that we understand

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1 why not and we can, as I say, make further submissions
2 where appropriate.

3 The second short point I wanted to make was to
4 endorse a suggestion by Mr Keith that there is
5 an earlier preliminary hearing this summer. We would
6 ask that thought be given to listing that earlier than
7 July, as that would potentially be just before a time
8 when I imagine a number of people will be taking
9 a summer break, and we are concerned that in practice
10 that might not achieve much more than the September
11 hearing. But we ask that that is something that the
12 Inquiry give consideration to.

13 If I can I will move on to the two main
14 submissions that we wanted to make orally today. The
15 first being -- concerning the scope of Module 2 and how
16 the list of issues plays into that.

17 Mr Keith this morning invited a direction from you
18 that a list of issues for Module 2 be provided either in
19 late April or early May. We welcome this. This would
20 be immensely helpful to our preparations. But we would
21 also welcome the opportunity to feed into the list of
22 issues ourselves and not be provided or presented with
23 a final definitive list. That might mean, for example,
24 that a draft be circulated earlier. We leave the
25 details of that up to the Inquiry. But we would be

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1 considered the impact on children, including how that
2 decision making dealt with children who had protected
3 characteristics, whether those rights were sufficiently
4 prioritised, and also look at the quality of that
5 decision making, which is not only about how those
6 decisions were made and how children's rights were
7 considered, but also the evidence or the expertise used
8 to feed in to those decisions.

9 We hope this is something that we can flesh out
10 further by providing more details about the list of
11 issues, which we hope to be provided for by your Inquiry
12 team.

13 Secondly, there is a question about how this
14 module fits in with later modules, and that's
15 particularly true when it comes to children. As we
16 understand it, there is likely to be more detail
17 forthcoming in early summer of this year about the scope
18 and detail of future modules. And we understand that
19 one of those modules will consider in particular
20 children, the impact on children, and education. We
21 invite your team to provide us with as much information
22 as possible about what issues might be covered in those,
23 because of course what issues are considered in Module 2
24 in relation to children will be affected by what issues
25 are considered in a later module. And whilst it is

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1 grateful for some directions or indications on that
2 point as to how the Core Participants feed in to what
3 would be an appropriate list of issues for this module
4 to consider.

5 Again, for example, we note that there was
6 a suggestion from Mr Keith this morning that decisions
7 made about custodial settings would not be considered
8 within this module. I understand that is perhaps the
9 rationale behind the lack of Rule 9 requests for the
10 MOJ.

11 We ask, along with others we note, for further
12 information about this decision. We had considered that
13 decision making concerning children in custody would be
14 properly within the scope of this module. And this may
15 be exactly the sort of issue that is properly considered
16 by us being provided with a provisional list of issues
17 that we can then provide comments or submissions on.

18 Having said that, there are a number of points
19 I wanted to make today about the scope of this module.
20 Firstly, in relation to children, whilst we would
21 welcome the opportunity to provide more details about
22 exactly how this module should consider the impact of
23 children, in brief we anticipate that the list of issues
24 will include how children were considered, and of course
25 it will need to include whether and how decision making

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1 inevitable that there may be some overlap, it is of more
2 concern to us that there may be inadvertently a gap in
3 what is considered and what we invite this -- the
4 Inquiry to consider in this module will inevitably be
5 impacted by that.

6 So the more information that can be provided to us
7 about that earlier on, the easier that exercise will be.
8 Then, of course, there will be a further question about
9 how this module and that later module interact in
10 particular concerning the rights of children.

11 Thirdly, when considering the scope of this
12 module, there is, of course, a concern raised by
13 a number of people about how inequalities and protected
14 characteristics are being addressed. That of course
15 includes children. It also includes structural racism.
16 We welcome your clear commitment today, and indeed
17 throughout this Inquiry, to keeping equalities at the
18 forefront of this Inquiry and the forefront of each
19 module. The question, however, that we pose is not
20 whether or not that will be achieved but how it is to be
21 achieved. And we wish to make some short points about
22 that.

23 The first point we make is that it is important
24 not to conflate structural racism with institutional
25 racism. We endorse, and I don't need to repeat, the

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1 excellent points made by Anna Morris, who addressed you
2 before the luncheon adjournment, about the importance of
3 structural racism, which we also consider to be relevant
4 to the children's rights organisations.

5 In our view it is essential to consider the impact
6 of that structural racism as part of the commitment that
7 you have made to consider inequalities throughout this
8 Inquiry.

9 We also invite the Inquiry to set out its approach
10 into how matters related to inequalities and protected
11 characteristics will be addressed. This could be done
12 by using the structure of an equalities impact
13 assessment on the Inquiry's approach itself. Having
14 a clear outline of how it will be addressed will allow
15 a transparent consideration of the Inquiry's approach to
16 considering structural racism and, indeed, any other
17 structural discrimination that is relevant to this
18 Inquiry.

19 Further, we invite the Inquiry, in setting out its
20 approach, to consider not only individual protected
21 characteristics but also how it will consider the
22 intersections between different equalities, including
23 the intersection of being a child and having another
24 protected characteristic.

25 In addition to the protected characteristics of
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1 to the children rights organisation, as indeed to other
2 Core Participants, and we have heard a great deal this
3 morning and we welcome the further information and
4 further clarifications. We also welcome the overall
5 approach and the commitment to enabling a range of
6 channels and specific outreach to seldom heard
7 communities, as well as the commitment to a
8 trauma-informed approach. We look forward to some of
9 our further questions being answered in the webinar
10 that's being proposed, and we don't doubt that your team
11 have been working hard on this aspect as well as other
12 aspects of the Inquiry.

13 However, the children's rights organisation do
14 wish to express the disappointment that so far no
15 children have been heard from, and we still are not
16 clear how or when they will be. We have asked for more
17 information and we have asked for further explanation as
18 to how children will be able to participate going
19 forward. We know they are not able to participate in
20 the web form that's currently available on the website.
21 And whilst a number of channels were suggested by
22 Mr Keith this morning as to how participation will be
23 facilitated, many of those channels would not be
24 appropriate for children to participate in. We are
25 concerned that if there are limited ways in which

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1 the Equalities Act, we also invite the Inquiry to
2 consider inequalities caused by socio-economic
3 disadvantage. Whilst there is no legal duty to do so in
4 England, unlike in Wales and Scotland, this would be
5 clearly material to the content of this Inquiry and
6 your Ladyship's priorities, and would help to
7 demonstrate the commitment to inequalities in this
8 Inquiry.

9 In setting out the Inquiry's approach to how
10 inequalities will be considered, one question, of
11 course, is what evidence and what expertise will be
12 needed in order to inform the approach?

13 We heard some detail of that from Mr Keith this
14 morning. That was helpful and we are grateful for those
15 indications. But we do endorse the proposal from other
16 Core Participants that an expert on structural racism
17 would support and assist your work. We ask, however,
18 that be considered in the round about all structural
19 consideration, the other protected characteristics, and
20 it would be considered fully as to what expertise does
21 need to be brought before the Inquiry, and indeed in
22 which modules it is more appropriate to bring them in.

23 I turn now to the second point to make, which was
24 concerning the listening exercise. Your Ladyship knows
25 that this has been a particular interest and importance

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1 children can participate then that will limit the number
2 of children who do participate.

3 We asked the question about a hypothetical child,
4 such as a ten-year old who wasn't able to go to school,
5 living with no garden, and maybe who experienced racial
6 discrimination, how would such a ten-year old contribute
7 to the listening exercise, how would they know about it
8 and how are they going to be supported?

9 So we have asked for more detail, because whilst
10 we accept that the aims and the commitment are laudable,
11 just like many of these commitments, the devil, I'm
12 afraid, is in the detail, and therefore we do welcome
13 further information, as we have set out in our written
14 submissions, and we thought it helpful to set out some
15 of the additional information that we are requiring and
16 why.

17 Firstly, we ask for it to be clear what the stated
18 objectives of the listening exercise are. Whilst of
19 course it is understood the importance of hearing from
20 people and them feeding in to the Inquiry, in our
21 submission, to be an effective exercise, there needs to
22 be explicit stated objectives as to what that is
23 achieving. And following from that, understanding how
24 that will feed into the Inquiry and impact on
25 your Ladyship's decisions.

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1 We have heard today that reports will be
2 considered. We ask whether or not those reports are
3 realistically going to be ready prior to the hearings in
4 Module 2. And again, if they are, how it is proposed
5 they feed in to them.

6 Following on from that question is, of course, the
7 question of whether or not a proposed timetable is yet
8 in place.

9 Finally, we ask for a commitment that the
10 tendering exercise for this phase will ask for specific
11 expertise in engaging children and whether that was part
12 of the procurement process.

13 My Lady, we know that you understand how important
14 it is to engage children in this process, and so we ask,
15 as I say, for those details so that we can assist and
16 hope that we can collaborate in ensuring that the
17 listening exercise is as effective as you aim it to be.

18 So, in summary, we are inviting directions about
19 the service of key issues -- of the service by your
20 Inquiry team of the list of key issues, as well as
21 a direction or some indication about how the Core
22 Participants feed in to determining that.

23 Further, we endorse and invite the direction of
24 an earlier preliminary hearing, as well as an outline of
25 how the Inquiry is intending to approach the issue of

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1 must be frustrating when months are going past and you
2 can't see the result as yet, but I hope you will be able
3 to learn the answers to some of your questions very
4 soon.

5 So thank you very much indeed for your help.

6 **MS TWITE:** Thank you, my Lady.

7 **BARONESS HALLETT:** Right, I think it is Ms Davies next,
8 please.

9 **Submission by MS DAVIES, KC**

10 **MS DAVIES:** Thank you, my Lady. Can I confirm that you can
11 see and hear me all right?

12 **BARONESS HALLETT:** I can, Ms Davies, thank you.

13 **MS DAVIES:** Thank you very much, my Lady.

14 I represent Southall Black Sisters, who are
15 commonly abbreviated to SBS, and I do so with Marina
16 Sergides and we are instructed by the Public Interest
17 Law Centre. I have five headings for my submissions,
18 which will be shorter, as a result of Mr Keith's opening
19 this morning, than I had anticipated. So that is
20 helpful.

21 My Lady, I need to start with the funding
22 decision. SBS is, of course, pleased that we have been
23 granted funding for legal representation. But, as we
24 say in our written submissions, my client is
25 devastated -- and that is not too strong a word -- that

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1 the impact of inequalities, and further detail on the
2 listening exercise, which we understand is probably
3 already forthcoming.

4 My Lady, unless I can assist you any further,
5 those are the submissions on behalf of the children's
6 rights organisations.

7 **BARONESS HALLETT:** Thank you very much, Ms Twite, that's
8 very helpful, and you've raised a number of matters that
9 we must consider very carefully. I do understand the
10 concern about the overlap between this module and later
11 modules, and I mentioned the overlap I think yesterday,
12 but I welcome your offer of assistance to make sure
13 there aren't any gaps and that matters don't fall
14 between the two modules.

15 As far as the comment you make about ensuring that
16 children are heard, yes, I totally and utterly believe
17 in that. I also, as I think you've heard me say before,
18 believe in acquiring or obtaining accounts from children
19 as soon as possible. I have done a lot of work
20 involving child witnesses over the years and I know how
21 memories can fade. Adult memories can fade but it is
22 even more important with young children to get their
23 accounts recorded as soon as possible, and I promise you
24 I have given specific instructions to the team to that
25 effect. So we will do what we can. But I appreciate it

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1 Solace Women's Aid was not awarded funding for legal
2 representation. Solace will be speaking immediately
3 after me and they can put their own case on funding, but
4 we do want to say that SBS supports their sister
5 organisation in asking for that funding decision to be
6 reconsidered.

7 SBS understand exactly the difficulties that
8 Solace face. As a charity, all of Solace's money is
9 fundraised for specific purposes. Those specific
10 purposes are the delivery of frontline services
11 supporting women and girls who have experienced domestic
12 abuse. When the public and funding organisations give
13 money to Solace, they do so on the basis that that money
14 be will be used to provide those necessary frontline
15 services and not legal representation.

16 Both SBS and Solace were designated as Core
17 Participants precisely because of their expertise in
18 domestic abuse. SBS are, of course, experts in domestic
19 abuse. They deliver frontline services and they lobby
20 on the issue. But their focus and their clientele are
21 black and ethnic minority women and migrant women. The
22 two groups were designated jointly with Core
23 Participants with joint legal representation because we
24 assumed it was thought that the two groups acting
25 together can assist the Inquiry in scrutinising

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1 Government decision making to ascertain what
2 consideration was given, if any, to the consequences of
3 lockdown on domestic abuse.

4 SBS are concerned that without funding for legal
5 representation, Solace will be unable to participate
6 effectively in this Inquiry, and SBS believes that that
7 will be a loss to the Inquiry. It will diminish the
8 Inquiry's ability to scrutinise Government decision
9 making in terms of the pandemic and lockdown on violence
10 against women and girls.

11 We thank you the TUC, who will be speaking shortly
12 after Solace, for their support, and we agree that
13 the TUC, as representatives of frontline workers during
14 the pandemic, should also be granted funding.

15 In summary, on funding therefore, SBS supports
16 both the TUC and, most importantly for SBS, its sister
17 organisation Solace in their requests that the refusal
18 of funding be reconsidered.

19 Let me move on to Rule 9 requests. We raised
20 a number of questions about the content of Rule 9
21 requests in our written submissions and some of those
22 were answered very helpfully this morning by Mr Keith.

23 But we repeat the point that others have made that
24 the decision not to disclose those requests has led to
25 uncertainty for the CPs, and we repeat the request made

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1 and so forth on those protected characteristics. We've
2 looked at the website of the four instructed experts and
3 we cannot see that any of them have a specialism in
4 equalities.

5 My Lady, the very first part of the Inquiry's
6 terms of reference as published state that the Inquiry
7 will consider any disparities evident in the impact of
8 the pandemic on different categories of people,
9 including but not limited to those relating to protected
10 characteristics under the Equality Act. My Lady, we
11 know that you are committed to that personally and that
12 counsel to the Inquiry is also committed to that.

13 Discrimination and the appropriate focus to be
14 given to equalities issues in public decision-making is
15 a complex matter. It is, of course, partly a legal
16 analysis which is for you to carry out, applying the
17 Bracking principles, which include that equalities
18 duties are an integral and important part of the
19 mechanism for ensuring the fulfilment of the aims of
20 anti-discrimination legislation, and that the court must
21 be satisfied that there has been a rigorous
22 consideration of the duty so that there is a proper
23 appreciation of the potential impact of the decision on
24 equality objectives and the desirability of promoting
25 them.

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1 by ourselves and others that the Rule 9 request should
2 be disclosed.

3 We appreciate the confirmation that Rule 9
4 requests have been sent to the Government Equalities
5 Hub, to the Domestic Abuse Commissioner and to the
6 Victims Commissioner. We also note Mr Keith's statement
7 this morning that the different units of the Home Office
8 that we suggested, the Forced Marriage Unit, the
9 Interpersonal Abuse Unit and UK Visas and Immigration
10 were not sent individual Rule 9 requests, and we hope
11 that the Rule 9 requests to the Home Office will cover
12 those areas and of course we await receipt of those
13 responses.

14 We do, finally, on Rule 9 requests, raise the
15 Government's Equalities unit which, as we understand
16 government structures, is separate to the Government
17 Equalities Hub, and is also separate to the Cabinet
18 Office, although the Equalities unit does work with both
19 of those, and so we suggest a separate Rule 9 request to
20 the Equalities unit.

21 On experts, we join the call for copies of the
22 letters of instruction. On 31 October, at the last
23 preliminary hearing in this module, we submitted that
24 expert evidence was needed on the assessment of the
25 proposed policies of lockdown dealing with the pandemic

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1 But, my Lady, in order for you to conduct that
2 legal analysis and come to a legal decision, compliance
3 with the public sector equality duty is also a factual
4 question. We say that in order for the Inquiry to be
5 satisfied of legal compliance, it cannot do so without
6 receiving expert advice on how the public sector
7 equality duty should have been approached when it came
8 to assessing the potential impact of the Government's
9 decisions regarding the pandemic and lockdown on women
10 and girls, and whether, having considered the evidence,
11 the various public bodies did approach their decisions
12 with that awareness. That is, the expert evidence we
13 say does not decide compliance, that is a matter for
14 you, but it assists and informs the legal analysis and
15 the legal decision that you have to make, my Lady.

16 For that reason we propose the instruction of
17 an expert specialising in the equalities aspects of
18 public decision-making when it comes to the interests of
19 women and girls. We do not suggest one general expert
20 dealing with all aspects of equalities and none of the
21 Core Participants have made that suggestion.

22 Expertise in, for example, structural racism is
23 an important matter and is different to expertise in the
24 protected characteristic of sex. We support the other
25 CPs' requests for an expert in structural racism but our

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1 separate request is for an expert whose specialism is
2 the equalities impact on women and girls that should be
3 considered in public decision making. And within that
4 specialism we would expect the expert to adopt
5 an intersectional approach, so that she or he
6 understands that women and girls have multifaceted
7 characteristics and can have more than one protected
8 characteristic.

9 SBS's particular interest, of course, is in the
10 areas of black and ethnic minority women and migrant
11 women, and we would expect an expert specialising in the
12 protected characteristic of sex, and its interaction
13 with race, class and immigration or nationality, to
14 understand those intersectional nuances.

15 There are various suggestions by other Core
16 Participants with which we agree. We agree that a third
17 preliminary hearing sometime in the summer seems
18 a sensible suggestion.

19 We support consideration of the opportunity for
20 Core Participants to ask questions of witnesses
21 directly, as raised predominantly by the Families
22 campaign. We would envisage that all Core Participants
23 would appropriately limit themselves, bearing in mind
24 time constraints, but we agree with the Families that
25 facilitating CP questions ensures the effective

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1 austerity over the previous ten years.

2 My final heading is on the Listening Exercise. We
3 are concerned at the ability of the current contractors
4 to undertake a trauma-informed approach to gathering
5 people's experience. Mr Keith's setting out of how the
6 contractors would work this morning was helpful, but our
7 concern is that the voices of women and girls,
8 particularly black and ethnic minority women and girls
9 and migrant women and girls, should be heard in the
10 listening exercise. We note that additional contractors
11 are to be engaged and we have recommended in our written
12 submissions -- I don't need to repeat them -- a number
13 of institutions who regularly undertake research into
14 domestic abuse, and therefore they have the appropriate
15 expertise when it comes to listening to trauma with
16 a confidential, sympathetic and understanding ear, and
17 we do submit that the listening exercise should consider
18 instructing one or several of them to undertake work
19 with survivors of domestic abuse.

20 My Lady, those are my five points.

21 I want to reiterate that you will next hear from
22 Solace Women's Aid and I have made the point that SBS
23 support their request for the refusal of funding to be
24 reconsidered.

25 Unless there is any other matter that I can help

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1 participation of the bereaved and, we would say, ensures
2 the effective participation of survivors of domestic
3 abuse as well as others.

4 We have already said that we support the
5 instruction of an expert into structural racism and of
6 disclosure of the letters of instruction to experts, and
7 I do not need to repeat Ms Morris' detailed submissions
8 of the importance of structural racism to this Inquiry.

9 We also agree that when it comes to the question
10 of scope and the list of issues that will be considered
11 in this module, and we support the submission made just
12 now by Ms Twite, that it would be helpful for Core
13 Participants to have the opportunity to feed in to the
14 list of issues by draft listings being circulated or
15 however it is done, but that the scope or list of issues
16 should take into account the context of the pandemic:
17 that it came ten years after austerity; that it came to
18 a society where we have racial and ethnic inequality,
19 including health inequalities, and inequality between
20 disabled and able-bodied members of society; as well as
21 a society that has not tackled violence against women
22 and girls. We say that that context is a vital area
23 that the Inquiry cannot avoid and that the Inquiry will
24 be scrutinising Government decision making bearing in
25 mind what had happened to public services as a result of

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1 your Ladyship with.

2 **BARONESS HALLETT:** No, thank you very much, Ms Davies. As
3 constructive as ever. And I shall bear very much in
4 mind the submissions you make. And I do understand the
5 point you are making about funding, I do, and
6 I undertake that I will consider very carefully the
7 submissions that are made, after we have taken a break,
8 from your colleagues at Solace Women's Aid. So thank
9 you very much.

10 We will break now until 3.25 pm, please.

11 **(3.12 pm)**

(A short break)

13 **(3.25 pm)**

14 **BARONESS HALLETT:** It is now the time for Ms Goshawk to
15 address me on behalf of Solace Women's Aid.

16 Ms Goshawk, are you there?

17 **MS GOSHAWK:** Yes.

18 **BARONESS HALLETT:** Hello. Can I just say this before you
19 begin, and I'm sorry to interrupt you before you have
20 even had a chance to start, if one can do that.

21 In your submissions, and Ms Davies has already
22 referred to them, Ms Goshawk, you refer to my funding
23 decision. I just wanted to say this. Funding decisions
24 are normally determined in writing. I do understand the
25 disappointment my decision was to your lay clients, and

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1 I have read your written submissions carefully and
 2 I think the best way forward, to prevent people thinking
 3 they can make oral representations on funding decisions,
 4 what I would like to do is to consider the written
 5 submissions you have made and to see whether they
 6 provide me with new material upon which I can reconsider
 7 my decision, but I would rather we didn't have oral
 8 representations on funding decisions. Does that make
 9 sense?

10 **MS GOSHAWK:** Yes, I will keep my submissions short then.

11 **BARONESS HALLETT:** I'm sorry about that, and I appreciate
 12 that you thought that you would be able to deal with it.
 13 I should have mentioned it before. But I have to be
 14 really careful about the process because I have to be
 15 fair, obviously, to all participants. And as far as
 16 other Core Participants are concerned, I have been
 17 sticking strictly to -- and for example, with Core
 18 Participants status, as you may know, I deal with that
 19 in writing. And save in exceptional circumstances, and
 20 so far I haven't found them, I think it is the only fair
 21 way to process it. But I promise your lay clients
 22 I will look very carefully at all the matters that you
 23 have put in your written submissions and see whether
 24 there is scope for a reconsideration.

25 **MS GOSHAWK:** Thank you.

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1 wanting to focus on their submissions around Rule 9
 2 requests, their instruction of expert witnesses on
 3 equalities and structural racism, including the
 4 intersectional experiences as far as the violence
 5 against women and girls, which we understand is still
 6 under consideration, and we thank the Inquiry for that.

7 And the Listening Exercise.

8 We were going to talk about the Rule 9 requests
 9 but we just wanted to thank the Inquiry for their
 10 confirmation about requests being sent to the Government
 11 Equalities Hub, Domestic Abuse Commissioner and Victims
 12 Commissioner, as Solace had called for alongside
 13 Southall Black Sisters in earlier preliminary hearings.

14 In relation to the Listening Exercise, we thank
 15 your Ladyship for your comments at the beginning of the
 16 hearing about providing further information about this
 17 exercise shortly.

18 We today reiterate the importance in ensuring that
 19 the voices of women and girls who experienced domestic
 20 abuse and wider forms of violence against women and
 21 girls during the pandemic and lockdown are heard. We
 22 believe this can be best achieved if those organising
 23 the Listening Exercise work closely with specialists who
 24 understand trauma-informed methods and, crucially, the
 25 experience of violence against women and girls. We

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1 **BARONESS HALLETT:** Thank you very much.

2 So as far as any other issues are concerned,
 3 Ms Goshawk -- I'm sorry, I hope I haven't, as it were,
 4 cut straight across you.

5 Submissions by MS GOSHAWK

6 **MS GOSHAWK:** It's okay, I will do my best to ad lib and make
 7 some tweaks.

8 So, Solace Women's Aid appears without the benefit
 9 of legal representation at preliminary hearing, and
 10 therefore I speak on behalf of the organisation as
 11 an employee.

12 I was going to focus on the funding for legal
 13 representation but I will move past the issue and focus
 14 on a couple of other things to support points raised by
 15 our sister organisation, Southall Black Sisters, and in
 16 particular the Listening Exercise.

17 So we thank the support of -- the written
 18 submission and this submission was prepared in-house
 19 with pro bono assistance from Southall Black Sisters'
 20 legal representations, and we wanted to thank them for
 21 that.

22 To go on to issues other than the funding matter,
 23 we have seen the submissions filed by our sister
 24 organisation, Southall Black Sisters, and agree with
 25 their written and oral submissions, in particular

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1 welcome the commitment to a trauma-informed approach to
 2 the exercise, but it is not currently clear on how the
 3 current organisations running this exercise have the
 4 expertise to work with survivors who may have or may
 5 currently still be experiencing abuse and violence or
 6 did so during the pandemic. And we want to reiterate
 7 the importance of ensuring that this exercise creates
 8 and maintains psychological and physical safety during
 9 the process of sharing their experiences.

10 I think other than the funding issue, that was all
 11 we wanted to raise today, because we supported the
 12 submissions of Southall Black Sisters, so I won't take
 13 any more of your time. Thank you.

14 **BARONESS HALLETT:** I'm very grateful, Ms Goshawk. Again,
 15 apologies for cutting across you.

16 I do understand the reservations you have about
 17 the Listening Exercise, perhaps as a result of some of
 18 the reporting about it. But can I emphasise again, as
 19 I hope Mr Keith emphasised this morning, there is
 20 a distinction between those who are currently advising
 21 us on how to communicate with particular groups and
 22 reach the seldom heard, for example, and those who will
 23 be working directly with people who have suffered
 24 domestic abuse or who have suffered bereavement or other
 25 kinds of suffering.

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1 So I do hope people are now beginning to
2 understand that when we are talking about the
3 trauma-informed approach, the trauma-informed approach
4 is not just in the way in which we communicate but in
5 the direct contact with people.

6 From my work in another capacity, I am very
7 conscious of the need to make sure that when you are
8 trying to get people to give their accounts that you
9 really do need to know what you are doing and the
10 difficult areas that you are venturing into.

11 So thank you very much for your help and I promise
12 you I will return to the question of funding to see
13 whether or not there is any reconsideration there that
14 can be done.

15 Thank you very much indeed.

16 Ms Gallagher.

17 **Submissions by MS GALLAGHER KC**

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

19 My Lady, I assume that the remarks in relation to
20 funding apply also to the TUC?

21 **BARONESS HALLETT:** I'm afraid so, Ms Gallagher, I was about
22 to say it. I appreciate that you understand that I have
23 to maintain the same process if I'm going to ensure
24 fairness to all.

25 **MS GALLAGHER:** I'm grateful. I will return to that very,
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1 before another pandemic strikes.

2 At the outset, on behalf of the TUC, we say that
3 we do not share the concern of those commentators
4 expressed in that way. Nor, frankly, do we recognise
5 the implicit slur. We of course have confidence,
6 my Lady, that you will conduct, as you have been, the
7 Inquiry impartially and openly, in accordance with your
8 statutory obligation to do so.

9 We, of course, may not always agree. On occasion
10 we may take issue with or challenge your decisions. But
11 there's simply no basis to the notion that you would
12 countenance presiding over a whitewash or cover-up, and
13 the TUC wish to put that on record in light of your
14 remarks in opening today.

15 I return, if I may, to the TUC's touchstone of the
16 three As, which we referred to at the October hearing,
17 my Lady: a desire for answers, accountability and above
18 all for action, so that lessons are learned from what
19 happened during this pandemic, and lives, livelihoods
20 and safety are protected.

21 From the earliest stages of this Inquiry process,
22 including prior to the completion of the terms of
23 reference, we have understood that we share those aims
24 with you in this process, my Lady. We also share your
25 desire to proceed as quickly as possible whilst ensuring
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1 very briefly at the end. But I won't make the
2 submissions I intended to make in light of the
3 indication that has been given.

4 **BARONESS HALLETT:** Thank you.

5 **MS GALLAGHER:** So, my Lady, may I start by addressing the
6 remarks that you made at the outset today regarding
7 certain commentators who are publicly suggesting that
8 this Inquiry may be a decade long whitewash and
9 establishment cover-up.

10 I suspect, my Lady, that those who are professing
11 to have so little faith in this Inquiry, or indeed in
12 you as its chair, may not be familiar with your work or
13 your record. I am one of the advocates in the virtual
14 room today who of course acted in the 7/7 London
15 bombings inquest. It was neither a decade long nor
16 a whitewash nor an establishment cover-up. Quite the
17 contrary. And I suspect anyone who has appeared before
18 you over the years, my Lady, would simply not recognise
19 the characterisation that those words suggest.

20 That suggestion also appears to be made without
21 awareness of the legal framework governing independent
22 inquiries or, indeed, the commitments you have made from
23 the outset, in your opening statement in July 2022, that
24 you will undertake and conclude the work of this inquiry
25 as speedily as possible so that lessons are learned
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1 the Inquiry is effective, including interim reports and
2 interim recommendations where merited.

3 Importantly, we know, although some commentators
4 may not, that submissions made by Mr Keith KC today, or
5 by Ms Carey KC, yesterday, or indeed by any other member
6 of your counsel or solicitor team, although made by your
7 team are not determinative of your decision-making.
8 Rather, the decision-maker is you, my Lady. You are
9 perfectly entitled to reject advice given to you or
10 submissions made to you by your Inquiry team. And where
11 there is a dispute between CTI and Core Participants,
12 you may, on occasion, prefer the submission of Core
13 Participants.

14 Now, you may have noticed two twin themes in our
15 recent written and oral submissions, including the
16 submissions for today, with us both requesting earlier
17 disclosure of the Inquiry's developing thinking on
18 future direction of travel of the Inquiry as a whole and
19 within specific modules, and also requesting earlier
20 preliminary hearings at a time when Core Participants
21 can still influence the direction of travel.

22 Those requests are made precisely because we know
23 your mind is not closed, you are open to taking
24 a different course to that proposed by your own team
25 where Core Participants persuade you otherwise.
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1 Hearings such as today are an opportunity to test
2 and challenge, where appropriate, views taken by your
3 own team behind the scenes, as well as performing
4 a multiplicity of other important functions, including
5 updating and informing Core Participants and the wider
6 public, as Mr Keith has done today, and to correct any
7 public misconceptions in the way you and Mr Keith have
8 done at the outset of today's hearings.

9 The former US Supreme Court Justice Louis Brandeis
10 once famously claimed that sunlight is said to be the
11 best disinfectant, and this is one situation in which we
12 consider that phrase to hold true. Exposing the Inquiry
13 team's developing thinking to the scrutiny of Core
14 Participants, who can then make informed submissions to
15 you as to whether they agree or disagree or urge
16 an alternative approach, whether they have identified
17 any gaps, and ensuring transparency to Core Participants
18 and the wider public, these are all critical to public
19 confidence in the Inquiry.

20 That's a running theme through the submissions we
21 have heard so far today but it also reflects submissions
22 made yesterday, including by Mr Beer KC for NHS England,
23 as well as by the TUC on multiple occasions, Bereaved
24 Families and others.

25 Against that backdrop, my Lady, we note with
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1 Participants. Mr Smith's annex B, the note on the
2 listening exercise and commemoration, is very much
3 appreciated by those I represent.

4 The TUC welcomes the approach taken by your team
5 in this module and we ask that a similar approach be
6 taken where possible in other modules. Finally in this
7 vein, my Lady, we also note that the Inquiry has heeded
8 the request made by the TUC in respect of a Rule 9
9 request for the HSE, and we are grateful for that.

10 Now, my Lady, we've made written submissions,
11 which I appreciate you've well in mind. I am conscious
12 I'm coming tenth in today's very long running order.
13 I'm mindful of the time.

14 Those two factors mean that, on a number of
15 topics, we simply endorse and adopt the submissions of
16 others. We don't need to make supplemental submissions,
17 or we rely upon our written submissions and don't need
18 to develop them in any detail orally.

19 In particular, my Lady, we agree with
20 Mr Friedman KC on reasonable adjustments, and indeed the
21 submissions made on this yesterday by Mr Burton KC,
22 Mr Metzger KC and Mr Wagner in Module 3.

23 On Rule 9 requests, we stand by our written
24 submissions and we endorse in particular the submissions
25 made by Ms Morris, soon to be formally appointed King's

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1 gratitude Mr Keith's indication this morning that the
2 TUC's suggestion of an additional preliminary hearing in
3 summer for this module is a sensible one. We propose
4 a May 2023 hearing for the reasons set out in our
5 written submissions at paragraphs 23 and 24, as if the
6 next hearing was in September, weeks before the proposed
7 start date, there would be no meaningful opportunity for
8 Core Participants to address you with adequate time to
9 influence the direction of travel or this module,
10 without adequate time to fill any gaps.

11 We are pleased to hear this suggestion has been
12 heeded. We are grateful for that.

13 We agree with Ms Twite that this should be earlier
14 than July, not only for the reasons she gives but also
15 because, in the TUC's submission, ideally this will take
16 place prior to the Module 1 final hearings commencing so
17 that there is timely clarity where there are currently,
18 and we accept understandably, unclear lines as between
19 Module 1 and Module 2. That is why we continue to
20 request this takes place in May.

21 My Lady, the TUC also wishes to emphasise that we
22 are very grateful to your Module 2 Inquiry team for the
23 extremely helpful note provided in advance of this
24 hearing. It's given us significant detail on a range of
25 matters. Annex A is hugely helpful to us and other Core
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1 Counsel later this month. And were I in court in
2 person, the TUC would of course be noting this and
3 extending congratulations to her, so I hope you will
4 forgive me taking the liberty of doing so in this online
5 forum too, my Lady.

6 **BARONESS HALLETT:** Not at all, Ms Gallagher. I'm sorry,
7 I didn't know. I wish to record my congratulations to
8 her as well.

9 **MS GALLAGHER:** Thank you.

10 On both the shock of and the apparent relevance of
11 the WhatsApp revelations overnight concerning
12 Matt Hancock, we echo Ms Morris and Mr McCaffrey in
13 particular this morning, and we agree with
14 Mr McCaffrey's submissions regarding the urgent need to
15 clarify the extent to which Mr Hancock, and indeed other
16 central Government ministers, have complied with their
17 disclosure obligations.

18 On Rule 10 issues we agree with and support
19 Ms Morris and Mr Friedman on their submissions today.

20 Disclosure and timeliness of disclosure, we have
21 nothing to add to our written submissions.

22 On scope, in respect of the particular position in
23 respect of Northern Ireland and the dividing line
24 between Module 1 and Module 2 on the one hand, Module 2
25 and Module 2C on the other, please see, my Lady, our

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1 written submissions at paragraphs 11 to 16. The short
2 point is that Northern Ireland is in a unique position
3 because from January 2017 to January 2020 there was no
4 functioning executive at all in Northern Ireland. It
5 was governed in essence by civil servants in a caretaker
6 capacity and the central Government, UK Government in
7 Westminster, had particular obligations, as there was no
8 functioning executive. And we remain unclear on the
9 dividing line between Module 1, 2 and 2C.

10 We agree Government and support Ms Campbell KC's
11 submissions this morning and their joint written
12 submissions by the Covid and Bereaved Families for
13 Justice and the Northern Ireland group on these matters.

14 Now, it seems from the submissions made by
15 Mr Keith this morning that there may not be a firm view
16 on precisely when and where all these issues will be
17 dealt with, and we understand that given the stage you
18 are at with information gathering and the Rule 9
19 process. We ask to be kept updated and informed and to
20 have the opportunity to address you in good time when
21 further information has been obtained and a provisional
22 view has been formed, and that supports are called for
23 the next preliminary hearing to be prior to Module 1
24 final hearings starting.

25 In respect of Long Covid, my Lady, we agree with
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1 research report on disabled workers' experiences during
2 the pandemic, which addresses how, before the outbreak
3 of the pandemic, disabled workers already faced huge
4 barriers getting into and staying in work, including
5 significant difficulties in accessing reasonable
6 adjustments, despite this being a legal duty for
7 employers, and how the pandemic greatly exacerbated the
8 barriers disabled people face.

9 As you know, not only have disabled people been
10 disproportionately affected in terms of loss of life but
11 pre-existing workplace barriers were accentuated by the
12 pandemic and additional workplace barriers arose,
13 particularly with working from home, and the TUC's work
14 mid-pandemic was conducted to better understand how
15 pre-existing workplace barriers were affected and those
16 matters.

17 I flag this because we agree with and support
18 Mr Friedman's submissions regarding informational gaps
19 and the inadequacy of data gathering processes. That's
20 an issue for disability. It is also extremely relevant
21 to other matters including race. And indeed these gaps
22 have lay in part behind the TUC's work during the
23 pandemic, filling gaps where Government was not going.

24 We also, in respect of international law, endorse
25 Mr Friedman's submissions about international law
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1 Mr Metzger KC's submissions regarding Long Covid being
2 a Governmental blind spot throughout and, indeed, since
3 the pandemic. This is a key area of work for the TUC.
4 Filling gaps in official provision.

5 Whilst I don't address that in detail now, I flag
6 it as a critical issue on which the TUC has been
7 undertaking detailed work for some time and an area in
8 which there are key questions for you, my Lady,
9 regarding the need for recommendations for change,
10 including why Long Covid is not recognised as
11 an occupational disease or as a disability. These are
12 matters we address in our Rule 9 statement for this
13 module, due to be filed tomorrow, and we will,
14 particularly in light of Mr Metzger's submissions today,
15 alert your teams to other potential evidence that could
16 be gathered.

17 In this respect, we note that, given the reference
18 by Mr Keith to the EHRC this morning, this is an area in
19 which the EHRC's position has been controversial and the
20 TUC and others have not agreed with it.

21 We also, my Lady, agree with and endorse
22 Mr Friedman's submissions regarding the Governmental
23 blind spot in respect of disabled people and what he
24 powerfully termed as "afterthought syndrome". We
25 commend in this respect to the Inquiry the June 2021
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1 standards and the CRPD, and we also draw to your
2 attention Articles 2 and 12 of the International
3 Covenant on Economic, Social and Cultural Rights, on the
4 right to health.

5 In that respect we commended to your Module 3 team
6 yesterday a very recent -- hot off the presses --
7 article from the Human Rights Law Review, by a number of
8 academics, led by Judith Bueno de Mesquita and
9 Claire Lougarre, *Lodestar in the Time of Coronavirus?*
10 *Interpreting International Obligations to Realise the*
11 *Right to Health During the COVID-19 Pandemic.*

12 My Lady, that was rather a long summary of matters
13 which I am not addressing in detail. There were three
14 matters I intended to address you on. One of them is
15 funding, which I will take very, very briefly at the
16 end. I'm not making substantive submissions in light of
17 the indication but I will address you briefly on next
18 steps.

19 The two points I do wish to address you on are
20 commemoration and experts, including the need for
21 expertise in structural racism issues.

22 First, my Lady, on commemoration and Every Story
23 Matters, we are grateful to Mr Smith, in writing,
24 Mr Keith this morning, for the detailed update, and the
25 TUC will engage further with your team regarding these
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1 issues.

2 Given timings, I raise one point now. Friday,
3 28 April 2023 is International Workers Memorial Day.
4 Held on 28 April every year, this day brings together
5 workers and their representatives from all around the
6 world to "remember the dead and fight for the living".

7 As you will know from our previous submissions,
8 over 15,000 people of working age died in the pandemic,
9 with a particularly devastating impact on people from
10 the black and minority ethnic community. Many of them
11 were key workers in high-risk workplaces, sectors such
12 as health, social care, transport, food processing and
13 textiles.

14 You may recall, my Lady, that last year, on
15 28 April 2022, the TUC and Covid Bereaved Families for
16 Justice issued a joint release calling on the government
17 not to stand in the way of your Inquiry, and to
18 implement in full your recommendations for the terms of
19 reference, at that stage in limbo. And also
20 fundamentally reminding us all that the voices of key
21 workers and the families of those who contracted the
22 virus at work would be central to understanding what
23 went wrong and learning lessons for the future.

24 Multiple events took place that day across the UK,
25 including ICTU's memorial event in Belfast, memorial

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1 paragraph 30 of our written submissions. I won't take
2 you to that orally. We don't pursue it further today.
3 We will address any specific proposals once made by your
4 team. You have our concern.

5 But more fundamentally, this is a module about
6 high level decision making by Government at multiple
7 levels, national, devolved, regional. In this module in
8 particular, we submit it is of vital importance that
9 there is an understanding regarding pre-existing
10 inequalities, structural discrimination, Government
11 decision making from an early stage and throughout the
12 pandemic, and whether due regard was paid to protected
13 characteristics and intersectional issues, and also the
14 differential impact of Covid upon multiple groups.

15 I say shortly, the TUC supports Ms Davies KC's
16 submission seeking an expert in respect of the protected
17 characteristic of sex, and the particular position of
18 women and girls.

19 And the TUC renews the request for an expert to
20 address issues concerning structural racism matters.

21 Now, we addressed you in part on this topic in
22 respect of Module 3 yesterday, my Lady. We don't repeat
23 those points. We return to it in light of further
24 reflection, Mr Keith's submissions this morning, and
25 additional matters arising in respect of Module 2.

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1 events held by the STUC across Scotland, including at
2 the workers memorials in Glasgow, Inverness, Paisley and
3 elsewhere.

4 In 2021, similarly, multiple actions took place
5 across all four nations of the UK, focused on workers
6 who had lost their lives during the Covid pandemic and
7 as a result of the Covid pandemic, including a minute's
8 silence at midday and a joint meeting at the Covid
9 Memorial Wall in London with the unions and with the
10 Covid Bereaved Families for Justice. Civic buildings
11 lit in purple in memory of those who died as a result of
12 the pandemic, and wrath laying in multiple locations,
13 including the workers memorial in Leeds, and the
14 Archbishop of York offering a message of condolence to
15 families of workers who had died.

16 My Lady, we ask, given its imminence, that your
17 team give thought to marking that day this year,
18 28 April, and we are happy to work further with your
19 team behind the scenes in respect of that.

20 I raise it because it is clear the next hearing of
21 this module won't be before 28 April. That's why
22 I raise it now.

23 The next issue concerns experts, including the
24 need for expertise in structural racism. My Lady, in
25 respect of experts, we raised one procedural matter at

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1 We support Ms Morrison's powerful submissions on
2 this issue today, and I don't repeat any points she's
3 made. We agree with her.

4 We hear Mr Keith's reassurance this morning that,
5 in respect of race, far from being ignored, this runs
6 like a steel wire throughout the Inquiry process. We
7 appreciate this is not a silo issue. It relates to each
8 and every single aspect of the Inquiry. It's relevant
9 to pre-existing healthcare inequalities, relevant to why
10 certain people do certain types of jobs, relevant to the
11 pattern of deaths, relevant to how decision makers
12 gathered information about patterns of infection and how
13 they responded to that information. And we say they
14 often didn't respond to that information because they
15 hadn't gathered it in the first place.

16 Now, you may recall our submissions at the
17 31 October hearing in this module regarding London bus
18 drivers, the early pattern which emerged regarding risks
19 to London bus drivers, and in particular to black male
20 bus drivers -- it is pages 142 to 144 of the
21 transcript -- and Mr Dayle's powerful submissions that
22 day regarding emerging patterns at a very early stage
23 about the particular adverse impact upon healthcare
24 workers from a BAME background. My Lady, we say these
25 issues are relevant to a whole series of matters

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1 throughout the Inquiry, often intersectional. May
 2 I give one example today?
 3 One example oft overlooked, as some academic
 4 experts on clinical ethics have recently noted, concerns
 5 PPE and the tendency for equipment to be designed based
 6 on a prototypical Caucasian male face and body shape.
 7 That derives in part from rules of regulatory approvals,
 8 a background in the construction industry, and the
 9 requirement to test the filtration efficiency of
 10 respirator masks using a standardised head form known as
 11 a Sheffield head. Now, whilst that provides
 12 a consistent basis for the quantitative evaluation of
 13 masks, it may also mean in particular that women and
 14 staff members of non-Caucasian ethnicities experienced
 15 poorly fitting PPE, and evidence was emerging from
 16 a very early stage to suggest that that was the case,
 17 picked up by a small number of academic, not picked up
 18 through official channels at that stage.

19 That's a key example of where your Inquiry team,
 20 despite their due diligence and the huge amount of work
 21 that they are doing, an issue like this may simply not
 22 be in their radar, because it's not in their wheelhouse,
 23 it's not their expertise. It is not the expertise of
 24 lawyers, it is the expertise of others.

25 Now, Mr Keith gave us a number of answers this
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1 Secondly, my Lady, we have no doubt that you and
 2 your Inquiry team have firmly in your mind the disparate
 3 impact of Covid. The statistics we do have give us some
 4 of that data. We appreciate some of those issues can be
 5 dealt with through, for example, considering primary
 6 contemporaneous evidence, witness evidence, questions of
 7 witnesses and indeed some academic analysis in articles
 8 already addressing those matters. We recognise that.
 9 But that type of evidence is limited and we suggest that
 10 an expert could add real value.

11 We also suggest an expert could be efficient and
 12 a timesaver, rather than non-experts in these issues
 13 trawling through detailed searches, attempting to
 14 identify relevant material.

15 And we say at its core understanding the what, the
 16 fact that there was an impact, doesn't assist with
 17 understanding the why.

18 I will give one example on this, my Lady, before
 19 wrapping up this point. This is an example particularly
 20 relevant to Module 3. You heard me yesterday giving the
 21 stark statistic of whilst only 20 per cent of NHS staff
 22 are from BAME backgrounds, early analysis showed that
 23 they accounted for about 64 per cent of deaths amongst
 24 healthcare workers.

25 Now, there could be a multiplicity of reasons for
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1 morning answering the charge that race is being ignored
 2 in this Inquiry, and we fully appreciate that it is not.
 3 Our issues are different. We are not seeking a report
 4 on systematic racism in general. It is not an abstract
 5 issue, as Ms Munroe put it yesterday, we're seeking
 6 expert input in the particular context of individual
 7 modules focused on your terms of reference.

8 Now, a number of points. First, Mr Keith this
 9 morning appeared to suggest that as, ultimately,
 10 questions concerning structural racism were questions of
 11 fact, as a result he said an expert may be of little
 12 utility because ultimately it is a matter of fact for
 13 you. But my Lady, look at CTI's note, at paragraph 20
 14 for this hearing, of the existing experts: Alex Thomas
 15 giving you evidence on decision making structures,
 16 Gavin Freeguard similarly giving you evidence of factual
 17 issues. Indeed, the same is true of experts in multiple
 18 contexts. When I sit as a coroner, cause of death is
 19 ultimately a matter for me to decide. Pathologist
 20 evidence is not determinative, I am the decision maker,
 21 but it is highly persuasive. And here, similarly, we
 22 say the question of whether there have been
 23 discriminatory practices, discriminatory decision
 24 making, whether there is structural racism, these are
 25 matters where you would be assisted by expert evidence.
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1 that disproportionately high mortality rate amongst NHS
 2 workers belonging to non-white ethnicities. It could,
 3 for example, be linked to their base job roles, the fact
 4 that the majority of staff belonging to minorities have
 5 frontline jobs, a disproportionately high number of BAME
 6 staff members are in medical roles rather than
 7 non-medical managerial positions. It could be linked to
 8 other factors, such as discriminatory deployment to
 9 areas with potentially high virus exposure or, indeed,
 10 to a tendency to underlying health conditions.

11 Now, it is notable that in 2020, surveys that were
 12 conducted asking BAME staff why they believed there was
 13 such a stark disproportionately high death rate amongst
 14 BAME workers came back with this answer: healthcare
 15 staff belonging to black, Asian or ethnic minority
 16 background, when asked for their opinion about this
 17 disproportionately high mortality in NHS workers who
 18 were non-white, the most common reason they gave in
 19 surveys was deployment in areas with higher potential
 20 for exposure to the virus. In other words, their belief
 21 at the time was that this was due to discriminatory
 22 deployment.

23 Now, I have no idea, neither do you or your team,
 24 at this stage, whether that suspicion is correct. I do
 25 know that if we rely on evidence from Kemi Badenoch,
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1 then Government minister, marking her own homework, the
2 statistics which were gathered by the government, and
3 looking simply at the headline figures at the end, you
4 will not be able to confidently answer that question.

5 An expert could even assist you, my Lady, in
6 advising the Inquiry on how to probe that issue, how to
7 conduct the process of the Inquiry itself.

8 The central issue here is the very statistical gap
9 in this field, which links to the CRDP point made by
10 Mr Friedman, links to the very reason why the TUC
11 undertook such detailed work on this issue at an early
12 stage, concerned that this was a blind spot from the
13 Government. Look at the dying on the job report of
14 June 2020, detailed questionnaire to TUC members,
15 July 2020, and even the TUC setting up a race task force
16 in September 2020. So analysing the adequacy of the
17 available statistics, the adequacy of the processes of
18 gathering information and why some information was never
19 gathered and was never available, all those of those
20 issues go to why an expert on this topic is central, and
21 we say it would be a fundamental mistake to overlook
22 that and to proceed without expert evidence.

23 We have heard the long list from Mr Keith this
24 morning about other matters, including the expert
25 reports from Professor Marmot, the renowned

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1 about the Inquiry's independence. I'm grateful not for
2 my own sake -- I confess I'm used to ill-informed
3 comment and criticism -- but I say that for the sake of
4 all those who suffered during the pandemic and who are
5 looking to this Inquiry to produce a record of what
6 happened during the pandemic of the dreadful impact on
7 so many of them, to answer their questions where we can,
8 and to learn lessons. They need to know, and I hope
9 they heard your remarks, that this Inquiry is firmly and
10 fiercely independent, and it will remain so.

11 Thank you, Ms Gallagher.

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

13 **BARONESS HALLETT:** Mr Dayle.

14 **Submission by MR DAYLE**

15 **MR DAYLE:** Good afternoon, my Lady. I propose to address
16 you on three areas in what I expect to be a fairly brief
17 presentation.

18 Firstly, I will seek to remind you or perhaps
19 reinforce the matters of principle that are the
20 foundation for FEHMO's involvement in this Inquiry.
21 Secondly, I will invite you to accept some core lines of
22 inquiry which we consider should obtain heightened
23 scrutiny in Module 2 and, thirdly, make some comments on
24 procedural matters in this module.

25 In the first preliminary hearing of Module 2,

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1 epidemiologist, Professor Clare Bamba, professor of
2 public health, and other evidence. None of that goes to
3 this central point. It doesn't answer Ms Morris this
4 morning. It doesn't answer us yesterday and today. It
5 doesn't answer Mr Leslie Thomas and the many others who
6 have addressed you on this point.

7 Finally, my Lady, in respect of funding, may
8 I just put on the record we support the Southall Black
9 Sisters' submissions that have been made, and we support
10 the application for funding from Solace Women's Aid. We
11 are deeply concerned, for the reasons we have set out in
12 our written submissions, about the approach taken to
13 funding. I won't address this further. I am grateful
14 for the indication that it's going to be looked at
15 afresh. And we would welcome the opportunity, my Lady,
16 to file further submissions with you on this point about
17 why we say there are special circumstances for the TUC
18 and, indeed, there are special circumstances for Solace
19 Women's Aid.

20 Unless I can assist you further, my Lady, they're
21 our submissions.

22 **BARONESS HALLETT:** Thank you very much indeed, Ms Gallagher.

23 As ever, the matters you raise merit very serious
24 consideration and that's what they will get.

25 May I also thank you for your opening remarks

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1 FEHMO submitted that a comprehensive investigation into
2 the Government's decision making processes and policies
3 was necessary to uncover any systematic failures that
4 may have contributed to the disproportionate impact on
5 minority healthcare workers and their communities.

6 We urge that a thorough and fearless exploration
7 of these issues was essential for the Public Inquiry to
8 fulfil its mandate and we identified structural racism,
9 institutional racism and health inequality as being
10 important considerations for the Inquiry's
11 investigations.

12 FEHMO seeks to reinforce the submissions in this
13 second preliminary hearing. Our position is rooted in
14 the UK Government's duties under Article 2 of the
15 European Convention on Human Rights. Under the Human
16 Rights Act, the State has a general systemic obligation
17 to put in place a framework of laws, precautions,
18 procedures, training and means of enforcement which will
19 to the greatest extent practicable protect life.

20 The UK Government held this systemic obligation
21 regarding its decision-making during the pandemic.
22 There was a duty to ensure that whether right to life of
23 its citizenry was at stake, the Government would take
24 positive and protective steps to safeguard those lives.

25 My Lady, we acknowledge the comments made by you

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1 and Mr Keith KC about the work that has already been
2 undertaken by this Inquiry, that appears to be alive to
3 the role of structural racism, institutional racism and
4 health inequality for Module 2 of your investigations.

5 We note Ms Twite's distinction between structural
6 racism and institutional racism which is well made.

7 No doubt your Inquiry appreciates the strength of
8 feelings expressed by many of the Core Participants at
9 yesterday's Module 3 hearing on these issues and indeed
10 those expressed by others who have spoken before me.

11 Given that the words used before are still fresh
12 in all our ears, it would serve little purpose for me to
13 repeat them and, in any event, there now appears to be
14 an understanding in principle on the relevance of these
15 issues in Module 2. Nevertheless we wish to reiterate
16 that answers must be sought as to how and why central
17 and local Government decision-making failed to properly
18 consider or even anticipate the issues of inequality
19 that were triggered by the pandemic and why it failed to
20 protect against the disproportionate deaths and poor
21 health outcomes suffered by ethnic minority healthcare
22 workers and their wider communities.

23 We wish to invite you, my Lady, to place
24 heightened scrutiny on three areas in Module 2: (1)
25 implementation of Government pre-planning; (2) the

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1 The crucial line of inquiry which we urge on you,
2 my Lady, is were there any specific measures taken by
3 the Government which anticipated the disproportionate
4 impact of Covid-19 on Black, Asian and minority ethnic
5 communities and healthcare workers? If so, what were
6 they and were they taken in a timely manner?

7 Secondly, the Inquiry must examine the existing
8 data architecture in public health at the peak of the
9 pandemic and here I must pause and acknowledge the
10 comments made by Mr Keith, who appeared to accept our
11 written submission on this point. It is important to
12 establish whether UK laboratory, field modelling and
13 case studies at the onset of Covid included references
14 to race and/or ethnicity and, if not, why not.

15 This is critical because the first public notice
16 that there were disproportionate deaths from Black,
17 Asian and minority ethnic communities appears to have
18 been purely anecdotal, escalated only through
19 campaigners and news reports rather than from agencies
20 of Government. So the fundamental question for the
21 Inquiry here is: was there any unified national system
22 of data capture that could apprehend rates of
23 infectivity or death rates based on race
24 and/or ethnicity and if no such system existed, how was
25 this data pursued and obtained?

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1 existing data architecture in public health; and (3) the
2 contemporaneous response to the disproportionate death
3 rate in Black, Asian and minority ethnic communities.

4 Importantly it must also be said that this
5 Inquiry's investigation should concern decisions that
6 were made, as well as decisions that ought to have been
7 made but were not. Firstly, in relation to
8 implementation of Government pre-planning, FEHMO submits
9 that Government emergency planning and work in building
10 pandemic resilience should have envisaged that health
11 inequality, occasioned by structural racism and wider
12 issues such as austerity, would exacerbate
13 vulnerabilities and probably result in
14 disproportionately adverse health outcomes within
15 communities of colour. And we trust that is this will
16 be explored within the remit of Module 1.

17 It follows therefore that such Government
18 pre-planning should have been evident in decision-making
19 given the high percentage of certain illnesses within
20 particular ethnic and racial groups that would heighten
21 vulnerabilities to respiratory illnesses and the high
22 percentage of Black, Asian and minority ethnic staff
23 that are in public facing roles, as you have heard, that
24 were likely to be put at higher risk of exposure of SARS
25 COV2 and other respiratory viruses.

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1 Thirdly, the Inquiry must closely examine the
2 contemporaneous response to disproportionate death rates
3 in Black, Asian and minority ethnic communities. It
4 soon became patently clear in early 2020 that there was
5 as disproportionately high rate of deaths among Black,
6 Asian and minority ethnic healthcare workers and in
7 their communities. This Inquiry must interrogate what,
8 if any, steps were taken to address this
9 contemporaneously and precisely at what points. Was
10 there a coordinated national response to the
11 disproportionately high number of deaths in Black, Asian
12 and minority ethnic communities and those workers. If
13 there was no such coordinated national response, what
14 was the rationale for the failure to act?

15 My Lady, I will now make some observations on
16 a few procedural matters. So as not to repeat
17 submissions that have been made by those before me,
18 I will very briefly point out that, on the issue of
19 participation, we wish to support the submissions made
20 by Ms Morris on behalf of the CBFFJ on the issue of
21 participation by Core Participants and our ability to
22 ask questions of witnesses in the Rule 10 process.

23 We repeat the requests made to date for disclosure
24 of Rule 9 requests to Core Participants on the basis
25 that it will allow Core Participants to scrutinise and

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1 identify any potential gaps in the evidence requested in
2 a timely manner and we have set out our position in our
3 written submissions and we need not rehearse them in
4 these submissions.

5 We join the calls requesting Core Participants to
6 be afforded the use of the more user friendly disclosure
7 platform, that issue has been canvassed already and we
8 associate ourselves with the submissions that have been
9 made on this point before. We note the Inquiry's
10 widening approach on redactions and plans to use auto
11 redaction technology with the intention of speeding up
12 the process.

13 Now let me say that we appreciate the
14 considerations that drive the need for redactions, as
15 Mr Keith outlined this morning with a great deal of
16 care. It still bears saying, however, that with the
17 removal of individual judgment, there remains a real
18 risk that the process may lose important information.
19 So we urge some amount of caution proportionately in
20 this approach, my Lady.

21 On the question of timetabling we also share the
22 concerns of the bereaved families group which has
23 already been made about the intended duration of
24 Module 2. We join in the observation that it might well
25 be insufficient for a full and effective investigation,

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1 combine to result in adverse racialised outcomes.

2 On the issue of parliamentary privilege we note
3 Mr Keith's observations and assurances on the scope of
4 parliamentary privilege and its implications on the
5 Inquiry's investigations.

6 As a matter of principle, and largely as
7 a reaction to Mr Keith's note on this matter, we
8 question the premise that as a statutory Public Inquiry
9 with the power to examine witnesses under oath, this
10 Inquiry's use of a statement made during proceedings in
11 Parliament, could be such that the statement is
12 impeached or questioned given: (1) it is always critical
13 to identify the purpose for which evidence or
14 proceedings in Parliament is adduced before privilege
15 attaches; (2) this Inquiry is prohibited from ruling on
16 or determining any person's civil or criminal liability;
17 (3) the policing of the boundaries between permissible
18 and impermissible uses of parliamentary materials
19 remains an active area; and (4) we are not aware of any
20 decided case which supports the broad brush application
21 of privilege in a statutory Inquiry.

22 We welcome Mr Keith's clear indication that the
23 Inquiry will take all practical steps to work around any
24 perceived limitations arising from parliamentary
25 privilege and the assurance that the issue should not

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1 given the subject matter and anticipated witnesses and
2 we ask that this is kept under review.

3 On the issue of experts, we wish to renew our
4 request for disclosure of expert instructions that were
5 served on the proposed experts. In the alternative, at
6 the very least, we seek confirmation that the named data
7 expert -- and I have spoken about the importance and the
8 centrality of the issue of data capture to FEHMO is
9 concerned -- that this expert will be addressing the
10 issues that we have raised of available data in respect
11 of race and/or ethnicity. And on the question of the
12 expert on structural racism, we wish to associate
13 ourselves wholly with the powerful submissions of
14 Ms Gallagher.

15 We disagree with the earlier remarks by Mr Keith
16 and say that this Inquiry would be assisted enormously
17 by the engagement of such expertise. Unlike what was
18 suggested this morning by Mr Keith, an expert on this
19 issue, especially one that has studied structural racism
20 in the context of healthcare, would not be a substitute
21 for findings of facts on relevant issues in this Inquiry
22 by you, my Lady. Rather it is hoped that an expert on
23 this subject can give the Inquiry the benefit of
24 rigorous academic study on the ways in which different
25 societal factors, including decisions by Government, may

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1 impact on disclosure of parliamentary material to Core
2 Participant. However, should any issues arise during
3 the course of Module 2, we will look forward to the
4 opportunity to make further submissions as soon as
5 possible.

6 On the issue of the listening exercise, Every
7 Story Matters, the FEHMO members are open to
8 participating in Every Story Matters. In our written
9 submissions we said that we are working to understand
10 more about how information will be fed into the planning
11 for and carrying out of detailed investigations under
12 the modules before committing the time involved.

13 We ask questions about transparency about the
14 process, including who is involved, what steps have been
15 taken to consider any conflict of interests; what areas
16 of expertise any appointed suppliers possess and details
17 as to how this exercise will operate and meaningfully
18 feed into the modular investigations and practice. We
19 welcome Mr Keith's update this morning and look forward
20 to even more information on this subject going forward.

21 Finally, FEHMO is conscious that indications have
22 been given previously and this is not a matter that was
23 raised in CTI's note, that you, my Lady, will be
24 assisted by panel members to make sure the Inquiry has
25 access to the full range of expertise needed to complete

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1 its important work.
 2 FEHMO remains of the view that this is a sensible
 3 and beneficial process and would be grateful for any
 4 update on this matter in the future.
 5 So, unless I can assist further, those would be my
 6 submissions at this time, my Lady.
 7 **BARONESS HALLETT:** Thank you very much Mr Dayle. A number
 8 of interesting points that you make and I shall consider
 9 them all very carefully. In relation to the last point
 10 you make about panel members, I can answer that simply;
 11 it is not a decision for me and I wasn't the person who
 12 made that comment, as you know, because it is in your
 13 written submissions. That was the Prime Minister of the
 14 day, Mr Johnson.
 15 I'm afraid I can't provide you with any kind of
 16 update, it is not in my power to either grant or decide
 17 not to grant panel members. Thank you very much indeed.
 18 Right. Mr Allen you have been waiting very
 19 patiently. I'm sorry you are the very last today.
 20 Ms Gallagher has been in this position, so she
 21 understands.
 22 **MR ALLEN:** Thank you very much my Lady and somebody had to
 23 go last and so I hope you will be pleased to hear that
 24 I have relatively little to say.
 25 As you know, I represent the Local Government
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1 for health and social care providers.
 2 Now, local authorities across England and Wales
 3 are highly involved in that process, particularly
 4 because of the social care responsibilities that local
 5 authorities have under the Care Act 2014. While they
 6 are not directly involved in the running of private
 7 healthcare -- social care organisations, the
 8 responsibilities for allocation and so on are
 9 an important part of the work that they do.
 10 So, understanding where that line lies, I think,
 11 is a matter which will need to be hardened up very, very
 12 soon indeed, in order to make sure that the focus in
 13 Module 2 and the focus in the later module on social
 14 care is well understood to all participants.
 15 But, on the basis that there will be consideration
 16 in a future module, we don't press the point about
 17 expert evidence on that at this stage.
 18 The more complex point which again Mr Keith
 19 addressed very shortly and we are glad that he did,
 20 concerns the decision that has already been taken about
 21 expert evidence which is being sought from Gavin
 22 Freeguard.
 23 The Local Government Association recognises
 24 Mr Freeguard as an appropriate expert and we are very
 25 glad to hear that he has been appointed. The concern
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1 Association, which is the membership organisation for
 2 all but two of the 333 principal local authorities in
 3 England and all the 22 Welsh local authorities.
 4 We have put in a submission for today's
 5 preliminary hearing which is limited to the issues of
 6 expert evidence and it was very helpful to hear this
 7 morning from Mr Keith in relation to both of those,
 8 which will enable me to make these submissions pretty
 9 shortly to you.
 10 The two areas that we put into our submission
 11 concerned the expert evidence in relation to data
 12 management and the expert evidence that we suggest you
 13 will need in relation to the delivery of social care
 14 during the pandemic.
 15 I'm going to take the second point first because
 16 it can be dealt with very shortly. Mr Keith says that
 17 that's not something of concern at present because it is
 18 intended to have a dedicated module on social care in
 19 due course.
 20 We understand that point and respect it, but we do
 21 think that it highlights yet again an issue which I am
 22 sure you are aware of, which is where the borderline
 23 will lie between different modules. At present the
 24 provisional outline scope for Module 2 states that it is
 25 proposed to examine the Government's guidance and advice
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1 that we have is that the CTI's note tells us that
 2 Mr Freeguard has been instructed to report on the access
 3 to and use of data by the UK Government and devolved
 4 administrations during the Covid-19 pandemic.
 5 What it doesn't say is that that specifically will
 6 involve looking at the relationship between central
 7 Government and local Government in relation to the use
 8 of data. Now, data management and interoperability
 9 between central and local Government was critical to
 10 finding a path through the pandemic.
 11 The role of principal local authorities in
 12 relation to many aspects of the management of the
 13 pandemic and indeed finding that successful path is,
 14 I think, well understood and it is certainly set out in
 15 the draft witness statement that has already been
 16 submitted to the Inquiry and which is currently being
 17 considered by the Inquiry team.
 18 I want, if I may, just to highlight three headings
 19 where this is critical. I do that because I recognise
 20 Mr Keith's statement this morning that, in the
 21 instructions to Mr Freeguard, the position of local
 22 authorities will be considered. We don't see those
 23 instructions as a decision has been taken already not to
 24 share instructions with Core Participants.
 25 But the three headings are: Data in relation to
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1 clinically extremely vulnerable people; we need to be
2 sure that Mr Freeguard looks at that data. I hope you
3 can still hear me. Data in relation to Covid-19 cases
4 and data in relation to vaccination. I hope my Lady
5 heard that. I will refer to it again. Clinically
6 extremely vulnerable, Covid-19 case data and vaccination
7 data. The way in which that data was shared with local
8 Government is something that we request is specifically
9 raised with Mr Freeguard so that it can be covered in
10 his expert evidence.

11 My Lady, those are the submissions that I want to
12 make today on behalf of the Local Government
13 Association. In a sense they go to the management of
14 getting that evidence in due course and it is proposed
15 that the Local Government Association should speak to
16 the Inquiry team about it. My Lady those are my
17 submissions.

18 **BARONESS HALLETT:** Thank you very much indeed Mr Allen and
19 I did catch what you were saying at the end, although
20 you were slightly breaking up.

21 As far as the overlap between modules, I do take
22 your point and it is a point well made and it is
23 something we are going to require help from all of the
24 Core Participants to ensure that we don't have matters
25 falling between the gaps, as I said earlier.

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1 obviously cross-reference details of the WhatsApp groups
2 and messages that we receive in order to identify gaps
3 in that material and where that appears to be the case
4 we then make further questions to fill those gaps.

5 So we have already received messages from over 60
6 WhatsApp groups and there will be many more to come,
7 I have no doubt. That of itself provides an answer to
8 those who suggest that the Inquiry should go even faster
9 because no sensible or proper public hearing can be held
10 in which witnesses are examined about emails or
11 WhatsApps and the documents in their possession, until
12 we have those materials gathered before us and that is
13 a process which takes obviously a little more time.

14 The second point concerns a point that Mr Friedman
15 KC made. He stated in terms that we had reached the
16 stage of deciding which witnesses to call. In fact, if
17 I may correct him, we have not.

18 We cannot make decisions about which witnesses to
19 call until of course we have received all the documents;
20 we have received the statements in response to our Rule
21 9 requests and we have considered and refined the issues
22 to which those materials give rise. That is plain
23 commonsense.

24 And that is why, my Lady, as you know, the list of
25 issues has to be drawn up, refined and of course sent

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1 As far as your point about the instructions to
2 Mr Freeguard, I will take that matter up with the
3 Inquiry team and see what's happening. Thank you very
4 much indeed.

5 Mr Keith.

6 **MR KEITH:** My Lady, you will be very pleased to know that
7 I have very little to add and I seek only to make two
8 points further by way of oral submissions.

9 The first point concerns WhatsApp messages. On
10 the subject of WhatsApp messages, I wanted to dispose of
11 any suggestion, which would be unwarranted, that we were
12 not aware of the WhatsApp messages which reference has
13 been made in the press today or any suggestion that we
14 are not in fact already significantly engaged in the
15 process of obtaining WhatsApp messages for ourselves.

16 The significance of WhatsApp messages has long
17 been known to us and we have been making Rule 9
18 disclosure requests for WhatsApp messages since
19 September of last year. Those requests have in fact
20 been made across Whitehall to Government departments,
21 individual ministers, civil servants, scientists and
22 specialist advisers.

23 It is clear from what I have said that what we
24 have requested goes very much further than the messages
25 which are the subject of today's reporting. We

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1 out to the Core Participants before we can make
2 a sensible decision about the witnesses that we intend
3 to call because we must permit the Core Participants the
4 ability to be able to make their own submissions to us
5 in relation to the detail of the list of issues.

6 When that stage comes, of course, we will welcome
7 all the observations and comments on the list of issues
8 and that is why our list of issues, contrary to what
9 Mr Friedman suggested, will only necessarily be
10 provisional because it cannot at its first stage take
11 account of what is yet to come by way of help and the
12 Core Participants.

13 My Lady, those are the only two points that I wish
14 to raise by way of reply submissions this afternoon.

15 That concludes everything that the advocates would wish
16 to put forward.

17 **BARONESS HALLETT:** Thank you very much, Mr Keith. Thank you
18 to everybody who has been attending online and stayed
19 with us during the course of another long but important
20 day.

21 I'm extremely grateful to everybody, as I said at
22 the beginning, for all their submissions and I shall
23 bear them all very much in mind. If I have to make any
24 rulings as opposed to issuing directions about
25 preliminary hearings and the like, I will make any

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1 ruling as soon as I can but obviously I want to reflect
 2 on a number of the issues that have been raised. Thank
 3 you everybody.

4 (4.30 pm)

(The hearing adjourned)

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