



**NOTICE OF DETERMINATION  
CORE PARTICIPANT APPLICATION  
MODULE 3 - BLUE LIGHT SERVICES**

**Introduction**

1. In my [Opening Statement](#) on 21 July 2022, I explained that Modules would be announced and opened in sequence, with those wishing to take a formal role in the Inquiry invited to apply to become Core Participants for each Module. On 8 November 2022, the Inquiry opened Module 3 and invited anyone who wished to be considered as a Core Participant to that Module to submit an application in writing to the Solicitor to the Inquiry by 5 December 2022.
2. The Inquiry has published the [Provisional Outline of Scope](#) for Module 3, which states that this Module will consider the impact of the Covid-19 pandemic on healthcare systems in England, Wales, Scotland and Northern Ireland. Further Modules will be announced and opened in due course, to address other aspects of the Inquiry's Terms of Reference.
3. On 2 December 2022 the Inquiry received an application from Blue Light Services ("the Applicant") for Core Participant status in Module 3.
4. I made a provisional decision dated 13 January 2023 not to designate the Applicant as a Core Participant in Module 3, thereby declining the application ("the Provisional Decision"). The Applicant was provided with an opportunity to renew the application in writing by 4pm on 20 January 2023.
5. The Applicant did not renew the application by the prescribed deadline. Accordingly, this Notice sets out my final decision on the application.

## Application

6. Applications for Core Participant status are considered in accordance with Rule 5 of the Inquiry Rules 2006, which provides:

*5.—(1) The chairman may designate a person as a core participant at any time during the course of the inquiry, provided that person consents to being so designated.*

*(2) In deciding whether to designate a person as a core participant, the chairman must in particular consider whether—*

- (a) the person played, or may have played, a direct and significant role in relation to the matters to which the inquiry relates;*
- (b) the person has a significant interest in an important aspect of the matters to which the inquiry relates; or*
- (c) the person may be subject to explicit or significant criticism during the inquiry proceedings or in the report, or in any interim report.*

*(3) A person ceases to be a core participant on—*

- (a) the date specified by the chairman in writing; or*
- (b) the end of the inquiry.*

7. In accordance with the approach set out in my Opening Statement and the Inquiry's [Core Participant Protocol](#), I have considered whether the application fulfils the requirements set out in Rule 5(2) in relation to the issues set out in the Provisional Outline of Scope for Module 3.

## Summary of Application

8. The Applicant identifies itself as a private ambulance service company with over 10 years of experience in the ambulance industry. The application is put on the basis that the Applicant's work is, among other things, to build emergency and non-emergency vehicles for private ambulance and NHS use; it adapts and modifies vehicles for use by the healthcare industry as ambulances and it provides its services to the NHS, private companies and prison services. The Applicant states that it provides a bespoke service to ensure that the interior of the vehicle remains as free from infection as possible, which is said to have been an imperative aspect of infection control during the Covid-19 pandemic. The application is put on the basis that the Applicant converted approximately 150 ambulances for various companies, including

London Ambulance Service, to protect the driver from airborne infection and reciprocally to protect patients and passengers on board. Furthermore, the Applicant asserts that it played a crucial role in the prevention of the spread of Covid-19 within healthcare settings (including infection control and the adequacy of PPE) and that evidence can be provided in this regard to demonstrate how a collective response assisted with reducing the spread of infection and harm. The Applicant asserts that, despite its role in adapting vehicles for infection control purposes, it and companies like it, were not given practical support such as the recognition of staff as frontline key workers who risked a lot to meet the demands of the market and support the response to the pandemic.

9. The application is put on the basis that the Applicant meets the criteria in Rule 5(2) of the Inquiry Rules 2006 in that it played a direct and significant role in relation to matters to which Module 3 relates and its contribution to the health service is an important aspect of the matters to which the Module relates.

### **Decision for the Applicant**

10. I have considered with great care everything that is said in the application. While I recognise the important work the Applicant is said to have done during the Covid-19 pandemic, my view is that the Applicant does not meet the criteria in Rule 5(2) for the purposes of Module 3.
11. Module 3 will consider the impact of the Covid-19 pandemic on healthcare systems in England, Wales, Scotland and Northern Ireland. This will include consideration of the healthcare consequences of how the governments and the public responded to the pandemic. It will examine the capacity of healthcare systems to respond to a pandemic and how this evolved during the pandemic. It will consider the primary, secondary and tertiary healthcare sectors and services and people's experience of healthcare during the pandemic, including through illustrative accounts. It will also examine healthcare-related inequalities (such as in relation to death rates, PPE and oximeters), with further detailed consideration in a separate designated Module.
12. The application is put on the basis that the Applicant played or may have played a direct and significant role in the matters with which Module 3 is concerned (Rule

5(2)(a)), and also has a significant interest in an important aspect of the matters to which Module 3 relates (Rule 5(2)(b)).

13. I do not consider the Applicant played a direct and significant role in the matters to which Module 3 relates. The Applicant may have played an important role in the response to the Covid-19 pandemic in terms of building, adapting and modifying vehicles for use as ambulances. However, in my view this was not a “direct” role in terms of healthcare systems, but rather an indirect one and so Rule 5(2)(a) is not met. Neither was it a “significant” role within the meaning of Rule 5(2)(a) in the context of overall healthcare systems or their delivery during the Covid-19 pandemic, which will be examined in Module 3 pursuant to the Provisional Outline of Scope, as compared with any other groups of providers of services, or more specifically here, services ancillary to healthcare systems.
14. Given the Applicant’s role, particularly its work in the fitting out of ambulances, the Applicant can be said to have some interest in healthcare and in healthcare systems. However, in the circumstances, and for the same reasons as those I have given in consideration of Rule 5(2)(a), I do not consider that this amounts to a “significant” interest in an important aspect of the matters to which Module 3 relates within the meaning of Rule 5(2)(b). Given the vast numbers of people who were involved with, or adversely affected by, the Covid-19 pandemic, very many people and organisations in the UK could potentially have an interest in the Inquiry and not everyone can be granted Core Participant status for the purpose of the Inquiry hearings.
15. Even if that were not the case, and having regard in particular to the need to manage the Inquiry efficiently and effectively, in my discretion I would decline to designate the Applicant as a Core Participant in Module 3. While I am bound to consider the factors set out in Rule 5(2), it is also open to me to take into account other relevant factors. I am not obliged to designate any particular person or organisation as a Core Participant. I am determined to run the Inquiry and Module 3 as thoroughly and as efficiently as possible, bearing in mind the Inquiry’s wide-ranging Terms of Reference and the need for the Inquiry process to be rigorous and fair.
16. It is not necessary for an individual or organisation to be a Core Participant in order to provide evidence to the Inquiry. The Applicant may have relevant information to give

in relation to matters being examined in the Inquiry and it is likely that the Inquiry will in due course seek information from a range of individuals, organisations and bodies who may have information relevant to the issues raised in the modules and, where appropriate, make requests for witness statements and documents.

17. For all of those reasons, having considered all of the information provided by the Applicant in light of the Provisional Outline of Scope for Module 3, I have decided that the Applicant should not be designated as a Core Participant in Module 3 and I confirm that this is my final decision.
  
18. I will keep the scope of Module 3 under review. My decision not to designate the Applicant as a Core Participant in Module 3 does not preclude it from making any further applications in respect of any later Modules. I will consider any future applications the Applicant may wish to make on their merits at the time they are made.

**Rt Hon Baroness (Heather) Hallett DBE**  
**Chair of the UK Covid-19 Inquiry**  
**13 February 2023**