

Tuesday, 25 April 2023

(10.30 am)

LADY HALLETT: Good morning. This is the third preliminary hearing for Module 1. We are only weeks away from the substantive hearings, which should be held at our hearing centre and will be in person as well as streamed online, and at which witnesses will be called.

Not surprisingly, there are a large number of issues to be considered today to ensure that we're all as prepared as we can be to make the hearings as effective as possible in June and July.

So I shall limit my opening remarks to those, and I shall ask Mr Hugo Keith King's Counsel to provide more details of the issues that he wishes to raise and those matters that he wishes to comment upon raised by the core participants in their submissions -- and I thank them, as ever, for their very helpful written submissions that I have considered very carefully -- and, therefore, we only need to focus on the most important matters today.

Mr Keith.

Statement by LEAD COUNSEL TO THE INQUIRY

MR KEITH: Thank you, my Lady.

As you know, and as you've said, this is the third preliminary hearing in Module 1, the first two having

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timetables.

But in order to provide a proper foundation for the debate we must have today surrounding the issue of most concern to the core participants, which is whether the process by which Rule 9 statements and documents have been disclosed to them and whether they will enable them to participate meaningfully and properly in the Module 1 public hearing, I need first to set out some figures concerning disclosure.

My Lady, I'm just going to pause there, because my screen has gone blank. It's showing up Mr Mitchell King's Counsel, counsel for Scottish Ministers, but I'm not entirely sure why that is.

LADY HALLETT: I've got a picture of you. I can hear you, Mr Keith, and I've got you under the heading of Claire Mitchell KC.

MR KEITH: Whoever it was, they have removed themselves from the screen in light of what I've just said, so I think the problem is resolved.

So, my Lady, the debate today, of course, is whether or not everybody can be ready in time for the hearing, and so to that end I need to set out some figures concerning the disclosure process.

Dealing firstly with the Rule 9s, including tranche 15, which was provided last Friday:

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been held by you on 4 October and 14 February.

My Lady, I don't propose to reintroduce the core participants or their legal representatives. There remain 27 core participants in Module 1, and all remain legally represented. We welcome them all, of course, to this hearing.

Written submissions for today have been received from eight core participants, in one case jointly. And I believe that you'll be hearing oral submissions from five of the core participants, that is to say from Covid-19 Bereaved Families for Justice, Northern Ireland Covid-19 Bereaved Families for Justice, Scottish Covid Bereaved, Covid-19 Bereaved Families for Justice Cymru, and the Trades Union Congress.

My Lady, I know you know that submissions have been received from three other bodies, core participants who don't wish to make oral submissions this morning. They are the Cabinet Office, NHS National Services Scotland, and Public Health Scotland. All the written submissions, as everyone would expect, have been very carefully considered by you and the Inquiry team.

An enormous amount has been done since we last met, and the Inquiry has worked extremely hard to ensure that it and the core participants will be ready for the public hearing scheduled under this most demanding of

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39 Rule 9 statements have been disclosed from 38 providers.

60 Rule 9 statements, or rather statements from 60 Rule 9 providers, are in final form and will go out in the next week or so. They are awaiting either final confirmation that no redactions or amendments are required, or they simply await to be put electronically on to the requisite system.

48 more draft statements simply await a signature. These include various parts of the Scottish and Welsh administrations and the Northern Irish Executive, and they will be received and then provided, also likely in the next two weeks.

Of the remainder of the total number of 212 Rule 9 requests made so far, responses are awaited from 38 statement providers, 13 draft statements are under consideration by the Inquiry, nine statement providers have either not replied or not engaged significantly, and six are clear that they will not be providing any responses at all.

So, shortly, the core participants will have Rule 9s from 145 providers. That is a very considerable amount of documentation.

On the exhibits front, including again tranche 15 from last Friday, some 5,200 documents have been

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1 disclosed to the core participants. Several hundred
2 more will be going out as part of tranche 16, likely to
3 be this Friday.

4 As far as what remains is concerned, some 3,300
5 documents are already with the material providers, or
6 about to go, decisions on relevance having been made.
7 They await simply a final indication from the material
8 providers that there are no issues with the redactions,
9 if any, which have been applied by the Inquiry, and that
10 there is nothing preventing their release to the
11 core participants. I expect that these 3,300 documents
12 will be provided in tranches over the course of the next
13 two to three weeks.

14 Around 6,700 documents are in the review process,
15 either at first or second level review, awaiting
16 a determination on relevance. Not all the documents
17 will be relevant, of course. As you know, many
18 thousands of documents from the documents which have
19 already been processed have been weeded out and were
20 weeded out because they were either not relevant or
21 because they were duplicative.

22 The pace at which the Inquiry paralegals and lawyers
23 in the review process have been able to assess documents
24 for relevance has gone up dramatically since we last met
25 due to considerable further resources being devoted to

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1 My Lady, at first blush, that may appear alarming,
2 but I must make three points.

3 First, the overall review process continues to speed
4 up, and so the time required to review the documents for
5 relevance will be shorter than for the documents that
6 have already been reviewed.

7 Second, many of these later documents are from
8 material providers who played a less central role in
9 emergency preparedness, resilience and response, and
10 therefore a smaller proportion of documents by
11 comparison to the historical proportion are likely, when
12 reviewed, to be found to be relevant, and they are also
13 likely to require fewer individual redactions, which
14 of course means the process can be generally speeded up.

15 Lastly, and most importantly in this particular
16 regard, we obviously know what general areas are likely
17 to be required to be raised with the first witnesses who
18 are to give evidence in the public hearing. We know
19 which witnesses are scheduled to be heard first, and we
20 know what documents are therefore likely to relate to
21 those witnesses and which need, therefore, to be
22 provided to the core participants in good time.

23 The core participants' responses to the evidence
24 proposals for the first week's witnesses are due to be
25 sent back to the Inquiry in the week of Monday, 22 May,

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1 this exercise. In short, the number of full-time
2 reviewers has been increased significantly, and so the
3 rate of progress at first level review has tripled, and
4 the rate of progress at the second level review has
5 doubled.

6 This allows us to be confident that such of these
7 documents that are determined to be relevant,
8 historically around 40% to 50% of all the documents
9 received -- because, of course, the Inquiry requests
10 documents that are potentially relevant but not all
11 proved to be relevant -- these can be sent to the
12 material providers shortly for them to see the documents
13 in their final state pre-disclosure before being sent
14 out to the core participants. These documents will be
15 received over the next month.

16 By then, in a month's time, around 11 to 12,000
17 documents are likely to have been disclosed in total.
18 This is a remarkable feat, given that the first tranche
19 was only made to the core participants on 20 December.

20 It is difficult to be precise, but we assess that
21 there are a considerable number of further documents
22 which remain to be received from the material providers,
23 to be numbered in the thousands. These documents, too,
24 will need to be reviewed and the relevant documents
25 amongst them disclosed.

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1 still four weeks' hence. By that stage, the
2 core participants will undoubtedly have received the
3 majority of all the documents likely to be relevant to
4 each witness.

5 Nevertheless, my Lady, the core participants
6 obviously expressed concern that the timing of the
7 provision of material will inhibit their ability to
8 participate meaningfully. I hope that the figures which
9 I have provided will reassure them that in this most
10 demanding of timescales that the process can and will be
11 made to function properly. But there are some further
12 points that I think I need to make.

13 Firstly, Module 1 was always going to be the most
14 demanding of processes. From the beginning, you made
15 clear your determination that the Inquiry should
16 commence its public hearings with the utmost dispatch.
17 It is plainly in the public interest that relevant
18 issues are scrutinised, that core witnesses and
19 documentation are examined, and that the Inquiry makes
20 its recommendations as quickly as possible so that
21 lessons are learned in time. That is obvious.
22 Moreover, it was the clear view of those whom you
23 consulted as part of the terms of reference public
24 consultation exercise. So we must commence on 13 June.
25 It would be wrong to consider putting it back out of

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1 a prospective fear that we might not be ready. We must
2 continue in confidence that we will make it work.

3 Secondly, the process was always going to be
4 demanding. In common with most Inquiries, it is just
5 not possible to secure and disclose every document in
6 advance of the public hearing in a way such to allow
7 core participants ample time within which to prepare for
8 the hearing. Legal processes, least of all Inquiries,
9 do not work like that. The reality is that
10 a considerable amount of documentation will continue to
11 be received by the core participants right up to the
12 point at which the witnesses to which they could
13 arguably relate will be giving evidence. It is
14 unavoidable.

15 May I say we have on our side no doubt whatsoever
16 that the core participants have the determination and
17 drive and their legal teams the legal skills to make it
18 work.

19 Third, there can be no doubt that by the time of the
20 hearing, sufficient material will have been secured and
21 disclosed and enough time afforded to the
22 core participants, and I should say the Inquiry team,
23 upon whom the greatest burden falls, to enable you to be
24 satisfied that you can conduct full and fair inquiry in
25 Module 1.

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1 system, such parts of the overall structure as is
2 necessary to answer the broad question: were we properly
3 ready for the pandemic that ensued?

4 It follows that no Inquiry is ever likely to be
5 rendered incomplete or inadequate by virtue of the
6 absolute number of documents it discloses or the number
7 of witnesses from whom it hears. It is impossible to
8 call every witness who can give evidence of every aspect
9 of every issue in every paragraph of the list of issues
10 for Module 1. The Inquiry has neither the time nor the
11 resources for this, and the core participants and the
12 public could not and would not wish this to be so.
13 Choices will have to be made and are being made, and
14 those choices have been made with the great assistance
15 of the core participants. As you know, they are due to
16 respond to the Inquiry's provisional list of witnesses
17 by Thursday this week, and we will gratefully receive
18 their comments, their help, and their assistance as to
19 which witnesses we, or you, conclude must be called.
20 I will return to this in a moment.

21 But the choices as to those witnesses can only be
22 guided by the identification of the core issues: what
23 was the state of preparedness? What lessons can be
24 learned? What recommendations can be made? We are
25 confident that we've identified the right issues to

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1 My Lady, with your enormous forensic experience, you
2 know that no participant in any forensic process can
3 ever identify, let alone prospectively, where the
4 precise boundaries of that process's reach should lie
5 and what material needs to be gathered in order to
6 ensure that the process discharges the obligations
7 placed upon it.

8 In other words, it's in the nature of these
9 Inquiries that no one can ever say precisely what
10 material, what documents, what policy material, what
11 emails, what WhatsApps need to be assembled, let alone
12 which witnesses have to be examined orally. The key is
13 to identify with sufficient precision the general issues
14 that are required to be ventilated and to seek and
15 disclose material relevant to those issues. It is the
16 ventilation, the airing of the issue or the issues that
17 matters.

18 That is especially so in Module 1, because Module 1,
19 concerned as it is with structural preparedness, is
20 necessarily quite a high level and a somewhat
21 ill-defined module. It is not an inquiry, that's to say
22 Module 1, into all aspects of the United Kingdom's
23 emergency planning, response and resilience, or the
24 whole of the United Kingdom's public health provision.
25 It is an inquiry into such parts of the preparedness

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1 present through a selection of the most relevant
2 witnesses. We just can't call every possible witness.

3 So, my Lady, drawing the threads of those
4 submissions together, I must emphasise that although the
5 law doesn't give core participants the sole right or
6 ability to decide themselves what witnesses should be
7 called to be examined, all the core participants,
8 including Covid-19 Bereaved Families for Justice, are
9 being given the opportunity to tell us what issues they
10 think we should explore, what witnesses they think we
11 should call, what should be put to them, and what
12 documents should be scrutinised.

13 That is why we sent out proposed provisional list of
14 issues, why we sent out the provisional list of
15 witnesses, and why the core participants will be fully
16 and properly engaged in the proposed evidence proposal
17 process by which they tell us and inform our decision as
18 to how we should examine witnesses, so they are given
19 the chance to help decide what evidence should be
20 produced.

21 My Lady, may I make one final point in this vein
22 concerning this Inquiry? It concerns the general
23 progress that you have made. Few countries have
24 established formal legal Inquiries investigating the
25 many aspects of the Covid pandemic, but of those that

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1 have, the UK Covid-19 Inquiry is the first to have
2 reached public hearings. A number of countries, such as
3 Sweden, Norway, Denmark, Australia and New Zealand, have
4 instead instituted independent commissions led by
5 experts in, for instance, epidemiology, public health,
6 economics and public policy. Some of those commissions
7 have indeed concluded, but they simply did not have
8 anything like the same scope or depth as this Inquiry,
9 and nor did they amount to full legal forensic
10 inquiries.

11 My Lady, with, I'm afraid -- and I apologise, that
12 rather lengthy introduction -- can I then turn to some
13 of the specific points raised in the very helpful
14 written submissions received from the core participants.

15 A number of general matters have been raised, to
16 which we have naturally given the most careful
17 consideration, and in relation to which I have no doubt
18 whatsoever that you will give your own consideration
19 when deciding what needs to be done in response. We're
20 very grateful to the core participants, though, for
21 their contribution and for raising these issues.

22 My Lady, the first issue concerns your ruling in
23 Module 2 concerning the procurement of expert evidence
24 to deal with the issue of structural racism.

25 In your 9 March ruling following the 1 March

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1 order to be able to address the decisions in that
2 context, it's obviously important to understand what is
3 structural racism, what its impact is, what its effects
4 are, and how and why it matters so very much.

5 There is an argument that a proper analysis of the
6 adequacy of the UK's general preparedness arrangements,
7 which are the subject of course of Module 1, must
8 similarly take into account the possible impact of
9 pre-existing structural racism. But I do not believe
10 there is any need to specifically instruct the experts
11 who have been commissioned in Module 2 to consider
12 themselves what the impact on Module 1 preparedness as
13 a result of structural racism might have been.

14 We have taken the alternative course, my Lady, of
15 asking Sir Michael Marmot, Professor Bambra -- two of
16 the existing experts, of course, from Module 1 -- to
17 address the extent to which structural racism was
18 a consideration in pandemic planning, and we await their
19 response.

20 My Lady, in my respectful submission, that is the
21 correct and proper course, particularly bearing in mind
22 the remaining time between now and the Module 1 public
23 hearing, to raise the important point or to address the
24 important point raised by those two core participant
25 groups.

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1 preliminary hearing in Module 2, you ruled at
2 paragraph 32 that Module 2 should obtain expert evidence
3 from a suitably qualified expert or experts on the
4 nature and degree of pre-pandemic structural racism.

5 You said that such an expert or experts would assist
6 you to understand the issue and would provide a clearer
7 evidential foundation upon which the specific issues of
8 Module 2 could be explored and developed, but you also
9 determined that you would consider in due course and
10 keep under review the extent to which such evidence
11 would be needed in other modules.

12 We are very grateful to Covid-19 Bereaved Families
13 for Justice UK and the Northern Ireland Bereaved
14 Families for Justice group for bringing this back to
15 your attention.

16 The purpose of your determination was not, of
17 course, to enable the Inquiry to consider whether
18 government decision-making, the subject of Module 2, was
19 knowingly infected by racism, but to better understand
20 the reality of structural racism and to set out the
21 proper context against which that decision-making falls
22 to be considered.

23 In other words, to what extent the decisions that
24 are the subject of Module 2 properly took into account
25 an understanding of pre-existing structural racism. In

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1 The second issue concerns points made particularly
2 by Covid-19 Bereaved Families for Justice UK and
3 Northern Ireland Covid-19 Bereaved Families for Justice
4 group, whether or not -- or the extent to which, rather,
5 the final form of the issues which the Inquiry has
6 promulgated by way of publishing the list of issues,
7 took into account their suggestions. They've expressed
8 concern that some, but not all, of the points that they
9 raised didn't appear to have led to amendments in the
10 proposed list, that they don't find reflection in the
11 final version of the list, and they don't know why.

12 My Lady, seven core participants responded with
13 their thoughts on the provisional list of issues, one
14 body having been given a week's extension, and all the
15 points were very carefully considered by the Module 1
16 lead solicitors and the entire barrister team, and
17 a number of changes were made. The matter was then
18 brought to your attention, of course, as the arbiter as
19 to what matters your Inquiry should look at.

20 The position is that, as I say, a number of changes
21 were made, but the remainder of the points -- we found
22 no reflection in the final form -- were not required to
23 be there, either because the point being made or the
24 issue sought to be included was already within the
25 intended scope of the list, or because the matters

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1 raised were not properly falling within Module 1, or, in
2 many cases, the points being made were in fact more of
3 an evidential matter, thereby being some things that
4 should more properly fall to be put to witnesses as
5 a matter of evidence.

6 So to give you an example, at paragraph 18 of the
7 helpful submissions provided by the Trades Union
8 Congress, a point is made concerning the interface
9 between public health services and social care.
10 Although the resilience of the social care sector is not
11 an issue, quite plainly within Module 1, the issue of
12 whether recommendations from Operation Cygnus concerning
13 the pressure that would be placed on the social care
14 system if the NHS started triaging patients and whether
15 that process worked is something that can be raised with
16 relevant witnesses in Module 1. It is something that is
17 just not required to be identified as a headline issue.
18 It is a matter that can properly be put and will be put
19 to the proper witnesses.

20 So the general point needs to be made: many of the
21 points that were advanced were reflections,
22 understandably, of evidential matters that you will be
23 calling evidence upon.

24 The structural problems and the overarching and the
25 wider issues of the resilience of the social care sector

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1 The fourth point concerns Mr Weatherby's submissions
2 that the Rule 9 requests that the Inquiry has made be
3 disclosed to the core participants. He and Mr Lavery
4 King's Counsel have reiterated their requests, the
5 Rule 9 requests made to the material providers, to have
6 been disclosed.

7 My Lady, in the first preliminary hearing in
8 Module 1, you ruled that the Rule 9 requests made by
9 the Inquiry should not be disclosed, and you adopted the
10 same approach in Module 2. But, of course, you stated
11 that you would keep the matter under review. We would
12 invite you not to order disclosure of the Rule 9s.

13 I'm just going to pause there again because
14 certainly my screen has gone blank. It's quite possible
15 that a core participant is not on mute and, therefore,
16 by making a noise has caused the camera to change to
17 them.

18 **LADY HALLETT:** I can see you, Mr Keith, and can hear you.

19 **MR KEITH:** I'm told it's working again.

20 So, in my submission, it's not necessary to order
21 disclosure of the Rule 9 requests. The two
22 core participant groups, my Lady, assert that they need
23 the Rule 9 requests in order to be able to assess the
24 rate of progress at which the Inquiry is making
25 disclosure. We respectfully suggest that there is no

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1 can also be, of course, raised with relevant witnesses
2 in a later module, as can be the point made also by the
3 Trades Union Congress that the social care workforce
4 felt abandoned by the government. Those are issues
5 which more properly fall to be addressed in later
6 modules.

7 The third area concerns whether or not preparedness
8 in hospitals and care homes falls within Module 1. This
9 is an issue which is raised by one particular
10 core participant. My Lady, in our submission, and
11 of course again it's a matter for you, the answer is:
12 no. Whilst Module 1 of course will look at high level
13 planning, the manner in which in general terms the
14 UK Government and the devolved administrations declared
15 how hospitals and care homes should prepare for civil
16 emergencies and pandemics, the more detailed examination
17 of preparedness in hospitals and care homes, especially
18 at an operational level, must be for the healthcare and
19 care sector modules. And to the extent that when the
20 highest levels of the government, UK Government and
21 devolved administrations, were making decisions in the
22 early days of the pandemic that affected hospitals and
23 care homes, obviously the nature and adequacy of that
24 decision-making will find an additional reflection in
25 Module 2. But they are not Module 1 issues.

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1 need for the disclosure of the Rule 9s. The
2 core participants know, by very fact of the amounts of
3 material being disclosed to them, from the monthly
4 updates from the Solicitor to the Inquiry, as well as
5 from the details of what I provided a few moments ago,
6 what that rate of progress is.

7 But more fundamentally, my Lady, now that the
8 core participants are receiving the fruit of that
9 progress, they're now receiving the statements and the
10 documentary exhibits which the Rule 9 requests seek,
11 there is simply no need for them to see the
12 underpinning, the underlying Rule 9 requests themselves.

13 Covid-19 Bereaved Families for Justice UK and
14 Northern Ireland Covid-19 Bereaved Families for Justice
15 also point out that they've received some exhibits
16 without the accompanying statements. The reason for
17 this, my Lady, will have been that, for whatever reason,
18 the statements were not ready to be disclosed but their
19 accompanying exhibits were, and so rather than holding
20 up the disclosure of the exhibits, the Inquiry would
21 have held back the statements until the disclosure
22 process was complete, so the exhibits were provided
23 unaccompanied, as it were. I believe that the
24 statements relating to those exhibits either have been
25 or will very shortly be disclosed.

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1 My Lady, the fifth point concerns the material
2 providers and some of the ways in which the Inquiry has
3 encountered difficulties in receiving documents and
4 information from them.

5 My Lady, almost all the core participants have
6 responded, quite understandably and with various degrees
7 of concern, to what we said in the note from the
8 Solicitor to the Inquiry and also in the Counsel to the
9 Inquiry note about the difficulties encountered with
10 a small number of material providers. The problem that
11 we have encountered is two-fold.

12 First, a number of the government corporate
13 statements that we were provided with, which set out
14 explanations as to how those departments or bodies
15 worked and what they did, were arguably insufficiently
16 rigorous in identifying ways in which those bodies or
17 departments failed to anticipate, plan for the pandemic,
18 or were insufficiently rigorous in identifying for our
19 benefit further lines of inquiry.

20 Where we perceive to be this case, and in fairness,
21 I must say, that the Rule 9 requests have generally been
22 extremely demanding, in terms of what was sought, the
23 length, and in terms of the time allowed, we have gone
24 back and sought further information in an even more
25 direct and pointed way.

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1 responded in the way that we would have wished. Most of
2 them have dedicated very considerable legal, financial
3 and administrative resources to responding quickly and
4 properly to our complex and lengthy requests. Some of
5 them have had to deal with multiple Rule 9 requests not
6 just from this module but from Modules 2 and 3 as well.

7 So, my Lady, there is no, now, real issue in
8 relation to the provision of material by material
9 providers.

10 The second aspect of this issue is as follows: three
11 Rule 9 recipients in particular were insufficiently
12 rigorous in their supply of potentially relevant
13 documents. In short, they provided too much. They
14 provided large numbers of what turned out to be
15 irrelevant or wrongly directed documentation.

16 My Lady, that possibly was borne out of
17 an overeagerness or just a failure, administratively, to
18 think more carefully about what they were doing. In one
19 case, the material that we were provided with failed to
20 specify whether it was related to Module 1, 2 or 3,
21 although there was no doubt, as it subsequently turned
22 out, what the Module 1 material was.

23 In another case, one material provider provided
24 over, I think, 13,000 documents in a three-week period.
25 My Lady, as I say, such responses were not borne out of

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1 The note from the Solicitor to the Inquiry sets out
2 the bodies and departments that have required this
3 sort of further Rule 9 request or clarification.

4 So, my Lady, the general position is that whatever
5 deficiencies were in the initial Rule 9 responses have
6 been rectified, as you would expect them to be so, by
7 virtue of the Inquiry responding to the material
8 providers.

9 Covid-19 Bereaved Families for Justice Cymru asked
10 a particular question as to whether or not the
11 Welsh Government was such an offender. The position in
12 relation to the Welsh Government was that in its draft
13 response, although the response was full and complete,
14 that there was a notable absence of supporting exhibits
15 in relation to some areas covered by the Rule 9
16 statement. This was rectified after we raised the
17 matter with them, and we demanded and we received
18 assurances, and we've received the material, of course,
19 to the effect that it wasn't enough just to make
20 statements of fact in statements; it was important that
21 whatever assertions the statements had made were
22 properly supported and backed up by exhibits.

23 My Lady, I should also say there has been no
24 shortage of endeavour or good faith on the part of all
25 the Rule 9 recipients, even if they've not initially

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1 malice or evasion but were simply a failure to properly
2 appreciate what the nature of the obligation was on
3 them, and to spend perhaps insufficient time thinking
4 about what it is that we needed from them.

5 The Module 1 Inquiry solicitor team, in the form of
6 Messrs Carlyon and Davies and Ms Bailey, have met, in
7 fact, many of the material providers and have been
8 astute to keep them on the straight and narrow. They
9 have sent multiple letters concerning prospective
10 deadlines, and multiple letters have gone back making
11 even more clear what documents we expect to receive and
12 making further inquiries. They, my Lady, have been
13 rightly critical of any departure from the material
14 expected from the material providers.

15 In the case of the three departments or bodies to
16 whom I made reference, we have met with all of them, and
17 we have had constructive conversations as to how
18 disclosure must be managed, and those processes are now
19 firmly back on track.

20 So, my Lady, coming to the heart of the submission
21 made by Mr Weatherby, there is, in our submission, no
22 need for position statements from the material
23 providers. Such statements would simply replicate in
24 different form and to no purpose whatsoever the
25 information that is already contained in the responses

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1 and in the disclosed documentation. Imposing on the
2 material providers the obligation to provide position
3 statements as to where their documentation takes them
4 would also consume limited time and resources that are,
5 frankly, more importantly directed towards complying
6 with the remaining disclosure requests. So we would
7 invite you not to take up that suggestion.

8 Point 6 concerns the general issue of the nature or
9 level of disclosure from the devolved administrations.
10 A point has been raised as to how far we have been able
11 to get in terms of getting disclosure from devolved
12 administrations. A very significant number, as you
13 would expect, of Rule 9s have been issued towards the
14 devolved administrations, but it just so happened that
15 many of those Rule 9s happened to be issued somewhat
16 later in the process of seeking disclosure. So the
17 disclosure from those Rule 9s falls to be made
18 correspondingly a little later in the process. But
19 I can say that the core participants are about to
20 receive very significant disclosure imminently from the
21 devolved administrations.

22 The joint submissions from Covid-19 Bereaved
23 Families for Justice UK and Northern Ireland Covid-19
24 Bereaved Families for Justice raise, at point 7,
25 an important point concerning the pre-witness evidence

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1 see it, the points that they've raised, and that it is
2 clear that the issues that they want us to put to
3 witnesses will be therefore put to witnesses, then they
4 needn't, of course, return to the fray and seek to
5 re-persuade us of the merits of their arguments.

6 So this process is optional, it wasn't meant to be
7 prescriptive, and the proposed template was suggested
8 simply to ensure that there is a consistency of approach
9 in the points that are made to us.

10 There is, contrary also to a further submission
11 that's made, no question of Counsel to the Inquiry
12 reading out robotically the written questions that may
13 be provided as part of this secondary route.

14 The process, which is not required in the rules, was
15 offered simply so that core participants could better
16 inform us of their views. But the submissions, my Lady,
17 are advanced in such a way as to appear to suggest that
18 what is really sought by the two groups is a general
19 indication from you that the Inquiry permits them, and
20 you permit them, to be allowed to ask questions of each
21 and every witness under Rule 10(4) and that you should
22 give that indication in advance of the witnesses giving
23 evidence.

24 We would invite you not to give any such indication.
25 The law, that is to say Rule 10(4) of the

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1 proposals. So, my Lady, those two groups have expressed
2 concern about our proposal that there be an additional
3 post-evidence proposal but in advance of the witness
4 giving evidence, by which the core participants can
5 raise, one further time, issues that they feel must be
6 put to witnesses by Counsel to the Inquiry but which
7 have not found favour as a result of their contribution
8 to the witness evidence proposals. In other words, this
9 additional process by which, if they fail to persuade us
10 of matters which must be put into the witness evidence
11 proposals, they have an additional route by which they
12 can repeat their requests, they can seek to change our
13 minds as to what needs to be put, and of course
14 contribute in a second way to the process of deciding
15 what issues need to be raised with the witnesses.

16 My Lady, in response to what's said in the written
17 submissions, can I be clear: it was not meant to be
18 an additional administrative burden, as has been
19 described. It was intended to afford an additional
20 route by which the core participants could
21 metaphorically bend Counsel to the Inquiry's collective
22 ear. It may also assist if I confirm that the process
23 is optional. If the core participants feel, as part of
24 the witness evidence proposal process, that Counsel to
25 the Inquiry have taken into account properly, as they

26

1 Inquiries Rules, does not of course give
2 core participants the right to ask questions of
3 witnesses; your permission must first be sought. And
4 I need to make plain: that is the law; it is not simply
5 a position adopted by your Inquiry.

6 Such applications for permission to examine or allow
7 the core participants themselves to examine witnesses
8 are obviously more sensibly made once the witness has
9 given evidence and has been examined by Counsel to the
10 Inquiry, because it is only at that point that it will
11 become clear what further areas may arguably need to be
12 examined, what areas the core participants feel have not
13 been properly put, and whether or not they feel that
14 Counsel to the Inquiry has not discharged the obligation
15 of sufficiently scrutinising the evidence of the
16 witness.

17 In other words, each application must be considered
18 on its own merits and in light of what the witness has
19 actually said. So, logically, my Lady, that precludes
20 the giving of an across the board permission in advance
21 of the evidence even being heard.

22 What can be done, however, of course, is that where
23 there are particular issues for particular witnesses,
24 where there is a clear argument, probably as a result
25 of the overriding importance of that issue to a particular

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1 core participant, that the core participants should be
2 able to ask questions themselves, as I say, in
3 reflection of the vital nature of the particular point,
4 then we may indicate in advance of the witness giving
5 evidence that that is likely to be something that will
6 find favour with you. But we cannot gainsay your
7 decision, and we cannot gainsay in particular your
8 decision prospectively. You must have the ability to
9 decide in respect of each witness whether or not such
10 permission should be given under Rule 10(4).

11 So, my Lady, those are our submissions in relation
12 to that point.

13 Point 8. The Bereaved Families for Justice Group UK
14 have written to the Inquiry enclosing a list of 21
15 bereaved family members whom the group believes should
16 be considered by the Inquiry and called to give evidence
17 in Module 1. My Lady, as you know, the schedule in the
18 letter summarises the evidence that the group believes
19 that those family members can give. The summaries
20 describe in unambiguous and distressing terms how their
21 loved ones suffered and died, and in most cases, their
22 opinions -- that is to say the opinions of the family
23 members -- as to why they believe that the hospitals and
24 care homes, the emergency services, the procedures, the
25 protocols and equipment, or the PPE and testing

29

1 and you will recall from the argument, you gave the
2 example of widespread use of Do Not Resuscitate notices.
3 If so, such evidence can be called in the healthcare
4 module to give evidence, and to give important evidence
5 to you, of the circumstances of those loved ones'
6 deaths, because the evidence of itself will say
7 something about, in that particular case, the widespread
8 use of Do Not Resuscitate notices, and of course
9 illuminates the approach to such notices that was taken
10 by hospitals.

11 But such evidence of how loved ones died, even when
12 coupled with the absolutely understandable and hugely
13 moving views of the makers of the statements as to why
14 they died and why they believe that the deaths were
15 contributed to by failings, doesn't go to Module 1.
16 Module 1 is concerned primarily with the period of time
17 from June 2019 to 21 January 2020 and is examining, and
18 I paraphrase of course, in general terms, the UK's
19 structural preparedness and planning.

20 Module 1 obviously includes issues as to whether or
21 not the risk of a coronavirus pandemic was properly
22 identified and planned for, and whether the
23 United Kingdom was ready for such an eventuality. But
24 the module is looking at the UK's preparedness for whole
25 system civil emergencies. And whilst that includes

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1 processes, among many other matters, were woefully
2 unprepared or inadequate.

3 The letter states its authors' belief that such
4 evidence is relevant and admissible in line with what it
5 says is, and what obviously the authors of the letter
6 believe, is the Inquiry's stated approach to call family
7 members in all modules.

8 My Lady, you have already ruled on whether such
9 evidence can be called. At paragraph 40 of your ruling
10 on 16 October, following the first preliminary hearing
11 in this module, you said in line with the terms of
12 reference which stipulate that the circumstances of
13 individual deaths cannot be examined, that:

14 "Evidence of circumstances of death should only be
15 admitted in this and later modules if it is relevant to
16 possible systemic failings."

17 My Lady, in our submission, but again as with all
18 these matters, it is entirely a matter for you. This
19 evidence of single deaths, however compelling and
20 terrible -- and it is -- is unlikely to be able to
21 demonstrate that there were systemic failings as opposed
22 to there having been a failure to prevent that
23 particular death. You made clear that you needed no
24 persuading that bereaved family members may well have
25 relevant evidence to give on possible systemic failings,

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1 resourcing, the system of risk management, pandemic
2 readiness, it is not concerned with what the impact was
3 of the pandemic, in reality, once it had struck, or with
4 operational preparedness.

5 So, my Lady, the Inquiry team proposes -- but
6 of course, again, I emphasise it's a matter for you --
7 not calling significant numbers of such persons in
8 Module 1 for the principal reasons that I have set out.
9 But instead we propose to call a single witness from
10 each of the bereaved groups at the end of the Module 1
11 public hearing to ensure that we and the public are all
12 powerfully reminded of the pandemic's destructive impact
13 and the terrible losses that were suffered. As
14 the Inquiry moves from examining, in a general sense,
15 the state of preparedness to examining, in the next
16 module, the arrival of the pandemic and the
17 United Kingdom government and the devolved
18 administrations' responses.

19 Let me also make clear that of course it remains
20 open to you at any time and throughout the Inquiry to
21 call evidence from bereaved families in relation to
22 later modules, because those modules, as I have
23 endeavoured to explain, are more directly concerned with
24 impact.

25 In short, bluntly, Module 1 is not concerned with

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1 impact; it is concerned with the anterior state of
2 affairs, the structural examination of our countries, in
3 advance of the pandemic striking.

4 My Lady, I wish also to add -- and I'll come back to
5 this later in my submissions -- each of the public
6 hearings will begin with a reminder of the devastating
7 impacts of the pandemic, because you have directed
8 the Inquiry to prepare films bringing the voices and
9 faces of those who were affected so terribly directly
10 into the hearing room. I'll come back to that later.

11 So, my Lady, those are our submissions in relation
12 to this important issue concerning whether or not you
13 should call a significant number of witnesses in
14 relation to individual deaths from bereaved groups, but
15 in particular the two groups who made those submissions
16 and the one group that sent the letter.

17 Point 9, my Lady, concerns a point raised by the
18 Scottish Covid Bereaved. The Scottish Covid Bereaved
19 raises a very good point which is whether or not, if
20 relevant further information comes to light after the
21 witness has given evidence, you would recall the
22 witness. My Lady, in our submission, the position that
23 you are likely to take and should take is that you
24 should recognise and confirm that you do have of course
25 a power to recall witnesses, because you have a very

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1 Agency. Follow-up letters have been sent to the
2 Executive Office, the Department of Health, Department
3 of Finance, the Department of Economy, DAERA, that's the
4 Department of Agriculture, Environment and Rural
5 Affairs, the CMO and the CSA, the Chief Scientific
6 Adviser, and the Public Health Agency.

7 I do acknowledge that Northern Ireland has not been
8 extensively covered in the report from Bruce Mann and
9 David Alexander to the same extent as the United Kingdom
10 and the other devolved administrations. But that said,
11 there are, my Lady, multiple references in their report
12 to Northern Ireland, and I shan't read them all out, but
13 they cover such matters as a high level overview as to
14 how civil contingencies are devolved in
15 Northern Ireland. They deal with the Northern Ireland
16 Executive response to pandemic planning. They deal with
17 the ConOps, the Concept of Operations for
18 Northern Ireland, the contingency structures, the
19 Department of Justice's approach to obtaining
20 information about civil contingency matters, the
21 recommendations on imposing legal duties, and they are
22 able to advance recommendations for your consideration
23 in relation to Northern Ireland in just the same way as
24 they do in relation to the other administrations and to
25 the UK Government.

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1 wide discretion to call any witness at any time on any
2 topic. But I imagine that you would consider exercising
3 that power, of course made on application, only if the
4 circumstances warranted it. It would obviously be
5 invidious if multiple numbers of witnesses were
6 recalled, because there simply wouldn't be the time
7 allowed in the process for such evidence to be reheard.

8 My Lady, then turning to, finally, some specific
9 forensic or evidential points which have been made,
10 point 10: the Covid-19 Bereaved Families for
11 Justice Group and the Northern Ireland Covid-19 Bereaved
12 Families for Justice Group ask to what extent
13 Northern Ireland has been covered in our existing expert
14 evidence on preparedness.

15 My Lady, the issue of preparedness of
16 Northern Ireland has naturally been extensively
17 addressed in the Rule 9s we've sent out. In no
18 particular order, we've sent reminders to Disability
19 Action Northern Ireland, the Northern Ireland Chief
20 Medical Officer, the Northern Ireland Department for
21 Finance, the Northern Ireland Department of Health, the
22 Executive Office, the NIEPGs, the Northern Ireland
23 Emergency Preparedness Groups, the Northern Ireland
24 Council for Voluntary Action, the NILGA, that's to say
25 the Local Government Association, and the Public Health

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1 My Lady, nevertheless, we have sent Messrs Mann and
2 Alexander, the corporate statement which the
3 Northern Ireland Covid-19 Bereaved Families for
4 Justice Group kindly provided, as well as their
5 submissions from the last preliminary hearing and this
6 one, in order to get from them their thoughts, and so we
7 await their response to that.

8 Point 11. Covid-19 Bereaved Families for
9 Justice Cymru asks whether former senior Cabinet members
10 have been Rule 9ed in Module 1. My Lady, we've sent
11 Rule 9s to a significant number of Welsh politicians,
12 including Mark Drakeford, of course the First Minister
13 for Wales, Carwyn Jones, the former First Minister,
14 Vaughan Gething, the Minister for Health and Social
15 Services until 2021, Rebecca Evans, the current Welsh
16 Minister of Finance, Ken Skates, the former Welsh
17 Minister of The Economy.

18 Twelfthly, Covid-19 Bereaved Families for
19 Justice Cymru seek clarification as to the extent to
20 which the expert evidence generally covers the devolved
21 administrations, but in particular Wales, and in
22 a similar vein, my Lady, Public Health Scotland have
23 asked about the extent of expert evidence covering
24 public health and Scotland. I've already addressed the
25 particular position of Northern Ireland in relation to

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1 the earlier submissions from Covid-19 Bereaved Families
2 for Justice.

3 My Lady, in a general sense, the expert evidence
4 does properly cover all the devolved administrations,
5 and I addressed you on that issue, in fact, at the last
6 preliminary hearing. But not all the expert evidence
7 can cover the devolved administrations to the same
8 degree. Much depends of course on the issue and of
9 course on the nature of the expert's subject matter that
10 is the subject of the reports.

11 So, for example, the report from Professor Whitworth
12 and Dr Hammer in relation to biosecurity, biosecurity
13 and biosecurity issues generally concern the
14 United Kingdom as a whole, and therefore it's difficult
15 to see how extensive devolved administrations' specific
16 angles might be culled from the material and from the
17 issue of biosecurity for separate specific
18 consideration.

19 Bruce Mann and David Alexander's report, as I've
20 said, provides extensive overviews of the devolved
21 administrations structures and some consideration of
22 their distinctive features, and their generic umbrella
23 recommendations apply to United Kingdom Government as
24 well as the devolved administrations.

25 Sir Michael Marmot and Professor Clare Bamba have

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1 that it's unlikely that there could ever be parity in
2 terms of the amount of material, expert report and
3 witnesses in respect of the devolved administrations by
4 comparison to the United Kingdom. Systems were
5 necessarily different, and in some cases they are
6 smaller and less extensive.

7 So, for example, it's clear from the material that
8 we've received from the Scottish Rule 9 recipients that
9 there is no general Chief Scientific Adviser type figure
10 in Scotland who is properly involved in pandemic
11 planning and preparedness. There is only, or was only,
12 the Chief Medical Officer at the time,
13 Catherine Calderwood. So it's futile to look to see
14 whether or not the CSA structures, which can be seen at
15 the UK level, are replicated in the devolved
16 administrations, in that case in Scotland.

17 My Lady, finally, in relation to the last forensic
18 issue, point 13, the Trades Union Congress asks for
19 a list of the bodies that the Inquiry will be examining
20 in Module 1 and also seeks further information on
21 Dr Kirchelle.

22 The short answer is that the majority of the bodies
23 to which the TUC refers are referred to, to a greater or
24 lesser extent than the Rule 9s, and so will be the
25 subject of examination, albeit to differing levels, in

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1 been provided, as I said, with additional specific
2 questions and comments from the core participants,
3 including those, as I've said, from the Northern Ireland
4 Bereaved Families for Justice Group, but the reality is
5 health inequalities, to a very large extent, are common
6 between the nations and are therefore dealt with by them
7 in a similar manner.

8 Finally, Dr Claas Kirchelle, his draft report has
9 not yet been received, but Covid-19 Bereaved Families
10 for Justice and the Northern Ireland Covid-19 Bereaved
11 Families for Justice Groups have expressed their
12 satisfaction that his instructions, in relation to the
13 history of public health bodies and pandemic
14 preparedness, are adequate.

15 My Lady, I must say, though, in relation to
16 Dr Kirchelle, he is an acknowledged expert on the
17 history of public health in England and Wales, and he
18 doesn't claim and therefore he can't advance
19 an identical degree of expertise in relation to Scotland
20 and Northern Ireland. But he has assured us that he
21 will be able to answer the questions put to him in
22 relation to all the DAs by virtue of drawing, to
23 a considerable extent, on all the published material
24 with which he is, of course, very familiar.

25 My Lady, in a general sense, it may be worth noting

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1 the course of Module 1. Public Health England and its
2 counterparts, it's obviously an important area. In
3 relation to the Health and Safety Executive, we did in
4 deference to the TUC's urging send a Rule 9 to the HSE,
5 but it may prove to be the case that they're not
6 particularly within scope.

7 Local authorities have not received Rule 9s
8 directly, but the position of local authorities can just
9 as efficiently be addressed by way of the Rule 9s that
10 we have sent to the overarching bodies, that's to say
11 the Local Government Association, the Welsh Local
12 Government Association, the Convention of Scottish Local
13 Authorities, the Association of Directors of Public
14 Health, the Northern Ireland Local Government
15 Association, and the National Police Chiefs' Council.

16 Similarly, there was simply no point, and it would
17 have been a particular drain on resources to send
18 Rule 9s to each local resilience forum when we had the
19 option, which we took, of making enquiries about local
20 resilience forums via the Local Government Association,
21 the Welsh Local Government Association, the Convention
22 of Scottish Local Authorities, and the emergency
23 preparedness groups, and so on.

24 As for Dr Kirchelle, the Inquiry team in fact
25 assembled some material when it was considering

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1 recommending to you that he be instructed. That
2 material, as well as his online CV, can be made
3 available on request.

4 So, my Lady, that brings me to the end of our
5 submissions in relation to all the points raised in the
6 various written submissions, bar one: Every Story
7 Matters. Would you wish me to address you on that now,
8 or would you wish to give the stenographer a ...

9 **LADY HALLETT:** If you could complete your submissions,
10 Mr Keith, and then we'll take a break.

11 **MR KEITH:** So turning to Every Story Matters, my Lady,
12 you're aware that this isn't of course part of Module 1,
13 but in deference to the fact that Mr Weatherby and
14 Mr Lavery say in their submissions that it has
15 provoked -- and I quote their words -- on behalf of
16 those whom they represent more anxiety and questions
17 than any other topic, I must address this issue too.

18 My Lady, the first point that they make is that
19 there is still no single place, whether a document or
20 an online note, where the bereaved families can find out
21 who will be involved, how it is intended to operate,
22 what the timescales are, how the trauma-informed
23 approach will be ensured, how the process will be
24 accessed, and so on.

25 In your 17 February ruling, following the second

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1 detailing everything that was raised and the responses
2 from the Inquiry is available online and was also sent
3 to the lawyers for some of the campaign groups.
4 Information about the webinar was also made available
5 through the Solicitor to the Inquiry update, and there
6 is information about Every Story Matters in those
7 updates too.

8 But, my Lady, I am nevertheless very sorry that some
9 of the core participants, according to their legal
10 representatives, believe that there is still an absence
11 of a clear and definitive guide to the Every Story
12 Matters process.

13 My Lady, you have directed that all the information
14 relating to Every Story Matters be brought together into
15 a single document and that that be published
16 straightaway. That letter will be published later this
17 week.

18 My Lady, Covid-19 Bereaved Families for Justice UK
19 and the Northern Irish group also asked for details of
20 how the targeted research part of Every Story Matters
21 will work. My Lady, as you know, this very substantial
22 project comprises a number of parts. All of them are
23 designed to allow as many ways as possible for members
24 of the public to tell their stories. The targeted
25 research is part of this.

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1 preliminary hearing in Module 1, you directed in fact
2 that the Inquiry team consider if there are ways in
3 which we could better improve, or improve our
4 communication, in terms of setting out this information.

5 I must say that a very significant amount of
6 information has been made available through emails and
7 letters, meetings with the leads for Covid-19 Bereaved
8 Families for Justice UK and other groups.

9 The Inquiry has met with over 100 organisations, in
10 fact, to engage with them on the design of Every Story
11 Matters, and that has naturally included individuals who
12 experienced bereavement during the pandemic, as well as
13 representatives from healthcare, trade unions,
14 equalities, children's groups, young persons'
15 organisations, and so on, in all four nations of the
16 United Kingdom.

17 Most importantly, there were two webinars held in
18 March 2023. My Lady, these were attended by Covid-19
19 Bereaved Families for Justice, Covid-19 Bereaved
20 Families for Justice Cymru, Scottish Covid Bereaved,
21 Long Covid groups, and 17 other organisations. They
22 raised a number of issues and concerns in the course of
23 the webinars, and these were addressed by the Inquiry
24 team who were present.

25 A transcript, certainly one of the webinars,

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1 Standing back, and addressing some of the parts of
2 the Inquiry, a pilot online form has been available
3 since November last year, and over 5,500 people have
4 already shared their stories with the Inquiry through
5 that online form.

6 However, a new and improved form will launch in May.
7 It incorporates a number of changes which have been made
8 following feedback from organisations and individuals,
9 including from the bereaved groups, who took part, and
10 we're very grateful to them in user testing.

11 So there will be a range of accessible versions of
12 the form, in multiple languages, and a phone line will
13 be made available to offer help in completing the form.
14 It will also be possible to complete the form in paper
15 format and to send it by freepost to the Inquiry. There
16 will be a public information campaign to encourage
17 participation in Every Story Matters, and that goes live
18 in June. It will include radio advertising, print
19 advertising, printed and digital billboards, adverts on
20 selected websites and on social media, and the
21 utilisation of links for the multitude of specialist
22 groups.

23 Turning to targeted research, this has already been
24 explained in the webinars and the meetings with the
25 campaign team groups -- well, the campaigning group

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1 teams. It is a process of approaching people, designed
2 to ensure that the Inquiry hears from those from whom we
3 particularly need to hear, the seldom heard, the
4 vulnerable, or difficult to reach communities. And how
5 it works, and is intended to work, is that the Inquiry
6 has drawn up, and will continue to draw up, categories
7 of persons defined by particular demographics,
8 experiences or impacts, or by reference to why their
9 stories are of particular assistance to the Inquiry,
10 whether it be because they suffered in hospital or in
11 care homes, or because they suffered bereavement or
12 other loss or harm, through vaccines, the application of
13 PPE, as a result of failings in Test and Trace, and so
14 on.

15 Those experiences, the impact on individuals of the
16 pandemic and/or bereavement and of treatment in hospital
17 and so on is of vital concern to the Inquiry and to
18 Every Story Matters. But they must be chosen according
19 to some sensible methodology because we must have, at
20 the same time, a representative mix across all regions
21 and nations of the United Kingdom, mixes and a proper
22 representative mix across gender, age, ethnicity and
23 other demographic factors.

24 So that, my Lady, is all that the phrase "key lines
25 of inquiry", a phrase that was used, in fact, in the

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1 in the community and in person. Community events will
2 be set up -- these will follow later in the autumn --
3 and what they are intended to provide is an opportunity
4 by which members of the community, particularly those
5 affected by the pandemic, bereaved, ethnic minority
6 groups, young persons, people in care homes, the
7 clinically vulnerable, long Covid sufferers, can engage
8 with the Inquiry in a community aspect as part of
9 a listening event.

10 Again, a great deal of care has been taken to ensure
11 that as many as people in a representative way can be
12 approached and can be encouraged to take place in this
13 process as possible.

14 To do that, my Lady, we need expertise that simply
15 doesn't exist within the Inquiry team. So as part of
16 the pilot process which has been in place up to now, of
17 course companies were approached and sought to be
18 engaged and contracted to help us with our work. The
19 pilot stage being about to end, we hope to sign new
20 contracts in the next couple of months for the remainder
21 of the Every Story Matters process. Those new
22 contracts, which I emphasise are yet to be awarded, will
23 replace the current contracts with Ipsos and
24 M&C Saatchi -- you will recall that M&C Saatchi is the
25 entity which subcontracted elements of its work to

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1 webinar, means. Obviously Inquiry staff, including the
2 lawyers, must have a hand, and have a hand already, in
3 drawing up the particular categories.

4 154 interviews have already taken place with members
5 of the public who have stories to tell but which are
6 particularly relevant to identifying these key lines of
7 inquiry. The Inquiry anticipates that, as part of this
8 targeted research part of Every Story Matters, hundreds
9 more interviews will take place this summer and
10 thereafter.

11 The interviews are being carried out in accordance
12 with specialist advice given to the Inquiry by
13 experienced community researchers who are specifically
14 trained in the compassionate use of information and who
15 apply what is known as a trauma-informed approach.

16 So, my Lady, there is a very extensive process
17 already in place which will continue to be developed,
18 and as part of that process, there is a targeted
19 research which ensures that the Inquiry reaches out to
20 the public and is not just reliant upon their response
21 by way of online or paper returns.

22 A final aspect of Every Story Matters that I want to
23 mention is the introduction of community events or
24 community listening events. So the Inquiry learned from
25 consultation last year the value of hearing from people

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1 23red. All those contracts end on 31 May.

2 Finally, in relation to Every Story Matters, I need
3 to say that, my Lady, you have directed the setting up
4 of an ethical advisory group which is intended to
5 provide an ethical review of the research, design and
6 the approach, all the matters to which I've made
7 reference, the key lines of inquiry, the need to find
8 a proper representative mix of the entire nation, and it
9 will examine and scrutinise the approach taken by
10 the Inquiry to Every Story Matters. That group will be
11 chaired by Professor David Archard of Queen's University
12 Belfast.

13 Commemoration, and this is the last issue, my Lady.
14 We have been working with the core participants and
15 organisations to make sure that we recognise and
16 acknowledge the human impact of the pandemic as part of
17 your proceedings. One of the ways in which we have been
18 working with organisations to represent the human impact
19 of the pandemic is by way of the commemorative art
20 installation in the form of a tapestry. So, my Lady, as
21 I've said before, and as you have noted, each panel in
22 the tapestry will be designed by a different artist
23 working in collaboration with a particular group or
24 community of individuals.

25 The tapestry panels will be unveiled at the hearing

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1 centre in June in time for the first public hearing, and
2 the thread and the linen making up the tapestry will be
3 sourced from all four nations in the United Kingdom.
4 Digital access to it will be provided later in the
5 summer to enable those not present at the hearings to
6 both view and read the stories behind the panels.

7 Following invitations to the bereaved families and
8 other core participants in February, as I mentioned
9 earlier, filming has also begun on the human impact
10 films to be played at the start of all the public
11 hearings, including Module 1. So a different film will
12 be played at the start of each module, and it will
13 feature people talking about their experiences and the
14 emotional and other terrible impacts that the pandemic
15 has had on them. Those filming sessions are taking
16 place across the United Kingdom.

17 My Lady, your Inquiry reached out to and arranged
18 for meetings to be held with the leads of the bereaved
19 groups, including Bereaved Families for Justice UK, to
20 ask for their support in finding people who would either
21 be willing to be filmed for the videos, or actually to
22 speak to and help the artists to shape the tapestry.
23 The Inquiry will also be writing to all
24 core participants with the dates of further filming days
25 in May in London and in the Midlands, and we would

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1 long time for this Inquiry to be established, and it has
2 no interest other than in assisting the Inquiry to work.

3 In so doing, the families wish to be allowed to
4 effectively engage with the process and take as full
5 a part as possible themselves and through their
6 representatives, and that's what underpins these
7 submissions and all others that I make.

8 We thank Mr Keith for his explanations this morning,
9 much of which was new to us, and I will endeavour to
10 tailor my submissions accordingly.

11 I must say at the outset, despite the upbeat way in
12 which Mr Keith has put the preparations, that we do have
13 some significant concerns about the progress towards the
14 start of Module 1 on 13 June. So I'll adopt the same
15 headings that Mr Keith has gone through this morning, so
16 I'll start with the list of issues.

17 We welcome a number of the amendments that were made
18 following the submissions from ourselves and other
19 core participants. As you've heard, we raised three
20 further points in our written submissions at
21 paragraph 2. We noted the amendment to expressly
22 include consideration of structural racism within
23 Module 1, and we raised the point -- as you have been
24 told this morning already -- that the Inquiry, being in
25 the process of instructing an expert to address

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1 simply ask interested core participants to submit
2 volunteer interviewees and to email the Inquiry's
3 engagement email address which will be provided with the
4 filming dates. My Lady, we need their help, and we ask
5 them to help us to deliver the Inquiry that you have set
6 us upon.

7 So, my Lady, those are all the submissions that
8 I make in relation to actually the many matters raised
9 by the core participants. And I repeat, we're very
10 grateful to them all for the way in which they've put
11 those points, all of which are thought provoking and
12 none of them unimportant, but I hope, my Lady, that that
13 answers the points that they have made.

14 **LADY HALLETT:** Thank you very much, Mr Keith. We shall
15 break now. I shall return at midday.

16 **(11.43 am)**

(A short break)

18 **(12.00)**

19 **LADY HALLETT:** We may be just slightly early. Mr Weatherby,
20 I can see you. You're there and ready to go.

**Submissions on behalf of Covid-19 Bereaved Families for
Justice by MR WEATHERBY**

23 **MR WEATHERBY:** Thank you, and almost good afternoon.

24 Can I start by reiterating that the Covid-19
25 Bereaved Families for Justice UK campaigned for a very

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1 structural racism in Module 2, that we had asked that
2 that report should cover Module 1.

3 Again, a reminder has been made that you indicated
4 in your ruling that you would consider the issue with
5 respect to other modules, and we're asking you to do
6 that here with respect to Module 1, not least because of
7 the amendment that you've made to the scope.

8 First of all, because that seems to be logical, and
9 we have always struggled to see how the issues of
10 structural racism could be considered in Module 2
11 without the expert considering how it affected
12 preparedness.

13 We hear what Mr Keith says regarding professors
14 Marmot and Bambra and dealing with these issues in
15 Module 1, but for the stated reasons, having decided to
16 instruct dedicated experts on this issue, we urge you to
17 consider that they would be the best experts to deal
18 with these matters with respect to Module 1 as well.

19 The second point, a short point, is that we did
20 raise a number of issues in our submissions on the
21 scope. Some of them were dealt with; some of them
22 weren't. We suspect, as Mr Keith seems to have
23 confirmed this morning, that many of them were
24 considered within scope. We will take that up, if we
25 may, with your team just to confirm whether in fact any

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1 of them were considered out of scope. It would helpful
2 to know.

3 The third point is a more substantial one about the
4 ambit of public health preparedness and whether it will
5 cover preparedness of the health and social care
6 sectors, so in short order, hospitals and care home
7 emergency planning and preparedness. We think it is
8 vital that they are included in Module 1 at a high
9 level, not least because we know they're not covered,
10 properly not covered, in our submission, in the
11 provisional scope of Module 3. So if they're not
12 covered in Module 1, where would they be covered?

13 We had some discussions yesterday between counsel,
14 and we thought in fact that the health and social care
15 preparedness was going to be included at a high level
16 within Module 1, to include hospitals and care homes at
17 a high level rather than an operational level. But
18 we're less sure this morning, from what has been said.

19 We fully understand that Module 1 shouldn't delve
20 into individual facilities, but we do think that it
21 should cover the overall preparedness of the NHS and the
22 healthcare systems within each of the devolved nations
23 and jurisdiction, and also the position within the
24 social care sectors, particularly but not exclusively
25 with respect to care homes.

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1 Mr Lavery, and I think Ms Heaven also is going to follow
2 in on aspects to do with Northern Ireland and Wales with
3 these in mind.

4 We also do raise the issues about expert assistance
5 with respect to the devolved issues on Module 1. We do
6 welcome the instruction of Dr Kirchelle, which may
7 assist with the concerns to some degree, but again I'll
8 leave it to others to add flesh to those bones.

9 In respect of Rule 9s and witness statements, I'm
10 really going to concentrate on the witness statements
11 rather than the Rule 9s. At paragraph 6 of our written
12 submissions, we noted that by the date of that
13 submission, last Wednesday, 19 April, we'd received only
14 four witness statements relating to the witnesses who
15 are on the Inquiry provisional Module 1 witness list.
16 So it's all very helpful Mr Keith has gone through the
17 wider picture of how many witness statements are extant
18 and where we're up to with them, but to us, the
19 concentration ought to be on the fact that we have
20 received such a small number of witness statements from
21 the list of witnesses who the Inquiry team currently
22 intends to call in only a few weeks' time.

23 I note that since last Wednesday, we have had one
24 further statement, so currently we have five out of,
25 I think, 58 non-expert witnesses provisionally expected

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1 So just by way of a couple of examples, we would say
2 that Module 1 should deal with things like the planning
3 and preparedness of bed capacity in the event of
4 a pandemic within the healthcare systems, and it should
5 consider things such as the planning and preparedness
6 for discharges and transfers between hospitals and the
7 social care sector and things like that, where -- albeit
8 we're cognisant of the fact it shouldn't go into
9 individual hospitals or care homes or specific
10 facilities -- but if not here, where will that be dealt
11 with, is the way we would put it.

12 Lastly, in respect of scope, Mr Keith again has
13 referred to the devolved nations and jurisdiction, and
14 we note the expanded reference within the list of
15 issues. However, as we'll come on to -- and again
16 Mr Keith has touched on -- this welcome expansion in the
17 language of the list of issues is welcome, but it isn't
18 currently matched by the extent of the disclosure
19 relating to the devolved preparedness, and we think that
20 that is a significant problem. Now, Mr Keith has
21 indicated this morning that we're imminently to receive
22 a large amount of such disclosure, and we hope that
23 comes to reality.

24 With respect to this topic, given the amount of
25 ground I'm going to cover, I'm going to defer to

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1 to be called, and that list also refers to the fact that
2 the list will get longer. At item 25 of the list, it
3 refers to an unknown number of individual scientists who
4 will be added, and again it doesn't include witnesses
5 that we may suggest or have suggested or indeed other
6 CPs have suggested. So the position is, in our
7 submission, quite significant.

8 Also, although we have had these five witness
9 statements, there are a number of key figures,
10 for example Mr Hunt or Mr Cameron, who are on the
11 witness list, so they are very important witness
12 statements that are awaited, and that gives us cause for
13 concern.

14 We note that the CTI note on 6 April at paragraph 17
15 said that the Inquiry anticipated receiving and
16 disclosing more statements over the course of that week,
17 and that at 17(b) it indicated sensibly that the Inquiry
18 team would prioritise disclosure of the witnesses on the
19 provisional list. Here we are three weeks later, and
20 only one more has been disclosed from those that are on
21 that list.

22 So it's not the absolute position that concerns us,
23 not only that, but it's the fact that the expectations
24 of CTI, with respect to progress on that front, do not
25 seem to have been realised, at least within that

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1 timeframe.

2 The next point is that in the note, and it's at
3 paragraph 4 to 8 of the CTI note, that it's stated that:

4 "Perhaps a substantial number of the witnesses on
5 the provisional list will be receiving further Rule 9s."

6 So (a) we haven't got most of the witness
7 statements, and (b) there's still further requests going
8 out to those witnesses. So that's, again, a factor of
9 real concern to us, of the Inquiry being able to be
10 properly ready by mid-June.

11 As Mr Keith mentioned, we're asked to comment on the
12 witness list by Thursday. That's going to be very
13 difficult when we have only a handful of the witness
14 statements. We don't have the Rule 9s, as a fact, and
15 therefore not only do we not have the statements but we
16 don't know what is expected to be within the statements,
17 which would have been a help in commenting on whether
18 the ambit of the provisional witness list is wide enough
19 or not.

20 Again, we did speak to Counsel to the Inquiry
21 yesterday about this problem, and we note that they're
22 sympathetic to our predicament in commenting on the list
23 by Thursday, and we're grateful for that. But the
24 timescale -- general timescale is of course incredibly
25 tight, so the solution to this is quite difficult to see

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1 simply would not provide the Chair with the detail that
2 she will require in order to consider their
3 responsibility for and involvement in the matters set
4 out in the Inquiry's provisional outline of scope or its
5 Rule 9 requests."

6 Of course, we read that with considerable concern.
7 In our submissions about position statements back in
8 September, we noted -- and again I quote that:

9 "Position statements ensure a comprehensive account
10 provided openly and at an early stage and avoid the
11 issue that can otherwise arise in which organisations
12 remain silent on matters until they are asked, creating
13 delay and an appearance of evasion which assists neither
14 the Inquiry, CPs nor the wider public."

15 Unfortunately, that submission appears to have
16 proved prescient. Let me make the point clear, as
17 I hope we did in our written submissions. When you
18 consider position statements, you describe the aim as
19 laudable but considered there was a better way of
20 achieving the same thing. At least from CTI's note, it
21 appears that that other way has been frustrated.

22 The note, as I've read, asserts that the deficits in
23 those statements should have been obvious to those
24 organisations. I'd add to that that central government
25 officials answer such requests through their lawyers,

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1 at the moment.

2 A further additional problem to that is that on the
3 current timetable, we're to receive and start to respond
4 to evidence proposals for those on that list from 15 and
5 22 May respectively. Translating that, it is 12 and 17
6 working days away, respectively, and that is a very
7 short period of time when, again, we don't have the
8 statements or indeed some of the documentation. So
9 we're to respond within two days to the list, we're then
10 to respond within 17 working days to evidence proposals,
11 and we don't have the statements of most of those
12 witnesses, and indeed we don't have a timetable either.

13 Turning to the issue of the content of the corporate
14 and other witness statements themselves, we again note
15 Mr Keith's reassurances this morning, and indeed we had
16 similar reassurances yesterday in the conversation that
17 I had with him. From the CTI note, it appears that
18 multiple central government departments have failed to
19 respond adequately to the requests made. At paragraph 6
20 of the note, referring directly to the central
21 government departments, CTI said:

22 "A considerable number of the statements contained
23 insufficient detail and posed more questions than they
24 answered. The Inquiry considers that it should have
25 been clear to those organisations that the statements

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1 and therefore there really is no excuse for any failures
2 to address matters.

3 We don't have the Rule 9s, we don't have more than
4 a handful of the completed statements, so it's not clear
5 to us in what way the central government departments
6 have failed to properly respond, other than that account
7 given in the note. We are given today some reassurance
8 and a different emphasis, if I can put it that way, on
9 the problem. But we haven't in fact seen any fruits of
10 those assurances, and we fear that there will be
11 a dragging of heels by certain of the material
12 providers, and that may be a continuing feature of the
13 whole Inquiry unless this matter is brought out into the
14 open.

15 The words used in the CTI note indicate this as
16 being a widespread problem, not one confined to one or
17 two statements, and, as I've said, the note pulls no
18 punches in asserting that the problem should have been
19 clear to the departments and, of course, their lawyers.

20 The fact we've received such a small number of
21 statements indicates the problems that this has caused
22 or exacerbated. The note was forthright in its
23 criticism of, effectively, the lack of co-operation, and
24 it generated the need for more requests. Although it's
25 welcome that CTI reports progress has been made, the

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1 proof will be when we see the statements, which
2 of course we haven't yet.

3 So we submit that the Inquiry should consider three
4 things: that where it is apparent that there has been
5 a failure to comply and thereby either caused -- or, in
6 fact, caused significant problems for the Inquiry, those
7 departments or organisations should be asked to account
8 for that, and those explanations should be disclosed.

9 Secondly, there should be open and transparent
10 directions setting out what was originally requested of
11 them and what has now had to be further requested and
12 the deadlines set.

13 Thirdly, as we've said in writing, and Mr Keith
14 turned to earlier, there should be further consideration
15 of whether requiring position statements, even now,
16 might be a way forward, a process which we've indicated
17 we're more than happy to assist with. We say "further
18 consideration" because we don't know what was and wasn't
19 included in the requests to the departments or the
20 deficits within what they did in fact reply. So we're
21 not, certainly not, asking for any repetition -- they
22 may not be necessary. But a critical issue to us is
23 whether the organisations were asked to proactively
24 address what they acknowledge went wrong or should have
25 been done differently or better in terms of their

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1 determining in the first place what is potentially
2 relevant. However, they can only do so if they have
3 proper guidance and they're clear what are the criteria.
4 How is the material provided to determine what is too
5 granular, and only through clear guidance and criteria
6 set by the Inquiry team. Is there such guidance and
7 criteria, and if so, can it be disclosed? What's the
8 process for checking that a consistent approach is being
9 applied across the piece? And how can the Inquiry be
10 clear that a consistent approach is being applied across
11 departments? Disclosure of these matters is important
12 not only for the Inquiry but also for core participants
13 to be reassured that proper disclosure is being made and
14 supervised by the Inquiry.

15 The fact that the Inquiry has such a massive task,
16 has core participants coming from different directions,
17 makes it very difficult for the Inquiry to ensure that
18 proper disclosure is being made to it, and it's only
19 really by publishing the criteria for that which will
20 make that process happen.

21 In terms of the Rule 10 process, or the questioning
22 of witnesses process, again this morning Mr Keith has
23 given considerable further information about the
24 approach, which is very welcome indeed. We dealt with
25 this in our written submissions between paragraphs 31

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1 planning and preparedness, and what they say are the
2 lessons already learned. The answer to those inquiries
3 has the potential to help the Inquiry really cut to the
4 core of the issues rather than to end up searching for
5 needles in the large number of documents that are the
6 haystacks that have been provided to the Inquiry.

7 We've seen little evidence that those questions have
8 in fact been asked from the statements, or indeed
9 answered, save perhaps in one statement which purports
10 to address lessons learned.

11 In terms of disclosure more generally, I'll deal
12 with this shortly, having dealt with the witness
13 statements or the lack of witness statements, we've
14 noted that there is a substantial amount of disclosure
15 remaining to be made, and Mr Keith has helpfully
16 outlined how much there really is.

17 We note what CTI has said about the considerable
18 amount of material being produced to the Inquiry without
19 proper reference to the requests or the scope of
20 Module 1, and in the written note there is reference to
21 much of it being too "granular".

22 We entirely understand the concept. It doesn't
23 assist the Inquiry or anybody else to just produce large
24 quantities of material and dump it, effectively, on the
25 Inquiry. Providers have to be responsible for

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1 and 38. We've put forward a tried and tested process
2 used at the Manchester Arena Inquiry, similar to some
3 other inquiries of which we have experience. Broadly,
4 that's the process that CTI puts forward as the first
5 part of its proposed process at paragraphs 28 and 9 of
6 the CTI note but undertaken in a shorter time period,
7 over about 14 days prior to the witness actually giving
8 evidence.

9 The solicitors to the Inquiry are familiar with that
10 process, as they were also STI on the Arena Inquiry, and
11 that process is straightforward. The Inquiry team
12 provide the proposals, core participants respond,
13 the Inquiry team review those responses, decisions are
14 made as to changes to the scope of evidence and the
15 topics each witness will be asked about and who will ask
16 the questions. Where there are unresolved points about
17 additional topics core participants raise, those
18 generally can be resolved through dialogue between
19 counsel, and then obviously you, as Chair, have the
20 final say. In our experience, the process generally
21 works with little or no need to trouble the Chair,
22 because it's iterative and it is a collaborative
23 process.

24 The issue of who asks the questions has been raised,
25 and the benefits of having more perspective than

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1 different voices have been made previously and repeated
 2 in summary in our written submissions. I don't take
 3 that further. But in our experience, this process leads
 4 to a situation where core participants may well not seek
 5 to ask questions of many witnesses, not least because
 6 Counsel to the Inquiry will cover all the points, but
 7 where core participants do seek to explore particular
 8 topics, a proportionate and efficient approach can be
 9 taken through this process.

10 We take -- we're happy with what's been said this
 11 morning by Mr Keith about that, and it appears that
 12 further consideration has been made, and there is the
 13 indication that there will be consideration given to
 14 core participants being able to take part in oral
 15 advocacy, and there can be discussions within this
 16 process. That's precisely what this process does
 17 include, as put forward by ourselves in those paragraphs
 18 which, as I say, does considerably overlap with the
 19 initial parts of the process.

20 I'm grateful to Mr Keith also for his comments about
 21 the additional process added at paragraphs 31 and
 22 following of his note, described as the pre-Rule 10
 23 process, because that to us is quite problematic, and
 24 it's been explained that this additional stage is for us
 25 to persuade that more questions can be asked. We're not

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1 first witness in Module 1 is called, on the approach as
 2 designed, with weekly witness proposals being disclosed
 3 from four weeks prior to the start date, there would be
 4 no less than five different weekly witness evidence
 5 proposals in process by the time the first witness is
 6 called. In our submission, that would be a recipe for
 7 chaos, and therefore we would urge the re-think. And,
 8 as I say, again, I'm pleased by the matter raised by
 9 Mr Keith about the reasonable discussions that can take
 10 place about other CPs taking part in the oral advocacy.

11 Can I finally turn to the issue of Every Story
 12 Matters and the witness evidence from the bereaved.

13 With respect to the Every Story Matters project, the
 14 commemorations and the proposed videos to be heard at
 15 the outset of each module, we've made various
 16 submissions. But in our current submissions at
 17 paragraphs 43 to 6, we really raise two key things: that
 18 firstly, a clear plan should be provided by the Inquiry
 19 as to how these projects are intended to work and to
 20 what end; and, secondly, that the position that has
 21 hitherto been extant that they are not part of the legal
 22 process should be dropped and there should be fuller
 23 dialogue and consultation with us as representatives of
 24 the bereaved about what the Inquiry is doing.

25 We have repeatedly made the first point, the need

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1 aware of other proceedings where this approach has been
 2 taken, and with the greatest of respect, we think
 3 there's a reason for that, because we don't think it
 4 will work.

5 The witness proposal, the response to it, the review
 6 of that, and the further dialogue necessary is
 7 straightforward and resolves issues, in our submission.
 8 Another round with a second series of documents which,
 9 at paragraph 32, CTI indicates would be a further
 10 template or spreadsheet, but which they expressly say
 11 should specify not just issues or topics but the
 12 specific questions that we would seek to ask -- that's
 13 paragraph 32(b). -- we say is just unworkable, that
 14 advocacy doesn't work like that. In fact, if it did, we
 15 wouldn't need oral questioning at all. One question
 16 leads to another or the end of a line of questioning.
 17 It's organic. And so where the further stage delves
 18 into that level of detail, we say that it is not
 19 helpful.

20 We also note that the objections that we would have
 21 to this pre-Rule 10 process are also very practical. We
 22 note that where it's operated before, the simpler
 23 process generally takes place over 14 days or
 24 thereabouts. This proposal would expand that something
 25 like four weeks. That would mean by the time that the

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1 for a clear plan setting everything out, and we're very
 2 pleased to hear that the Inquiry has now seen that this
 3 is the right course to take, and that is a big step
 4 forward, with respect.

5 Confidence in the Every Story Matters project by the
 6 bereaved families I represent is very low indeed. It's
 7 therefore important that the plan that is set out is as
 8 comprehensive as it can be and, in our respectful
 9 submission, it should include how the material is to be
 10 gathered, who by, what expertise and training they are
 11 to have, how the process of the information gathered can
 12 be quality assured -- we note that anyone can complete
 13 the online form even multiple times -- and the product
 14 of it is to be anonymised.

15 We know, from the webinar transcript Mr Keith
 16 referred to, about the targeted qualitative research to
 17 be directed by the Inquiry team. We're grateful for his
 18 further explanation about that, but it would be helpful
 19 to have that fully set out in the plan: the criteria
 20 set, again who will undertake it, and what is being
 21 sought.

22 We note also the ethics panel and the terms of
 23 reference regarding this targeted research. Again, we
 24 would like to understand that in greater detail, and it
 25 would have been helpful to have had dialogue about it

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1 before it was set up. So, as I say, we think it's
2 a considerable step forward that the Inquiry is going to
3 provide this plan.

4 Once the information is gathered, the next part that
5 we hope the plan will address is: what is to happen to
6 it? How is it to be analysed and by whom? What
7 experience and training will they have? What's the
8 object of the analysis? We're told there is to be
9 a series of research reports which will be adduced in
10 evidence in each module. The webinar transcript
11 confirmed that Ipsos would be doing the analysis.
12 Perhaps that may not be fixed in stone, given what was
13 said about the contracts. But what experience and
14 expertise and training does Ipsos, or whoever does it --
15 what do they have in that regard? It's very important,
16 and very important in terms of messaging to the bereaved
17 but no doubt others as well, that this is not treated as
18 some kind of market research and that the people who are
19 doing it have training or expertise in dealing with the
20 bereaved.

21 The transcript indicates that the reports should
22 answer the key questions in each of the modules, that
23 they will after a few months be reviewed as to whether
24 there are further areas we, the Inquiry, need to
25 explore.

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1 us as the representatives of the bereaved, and not in
2 any way diminishing the importance of engaging with the
3 bereaved directly themselves.

4 In terms of the other matters, in terms of
5 commemorations and the videos, whereas we welcome the
6 fact that the Inquiry is looking at commemorations and
7 looking at the experiences of the bereaved and others in
8 respect of the pandemic, we do remain of the view that
9 the Inquiry should keep under consideration hearing
10 directly from a proportionate number of the bereaved in
11 both of those regards. We understand the videos,
12 for example, are going to be approximately 15 minutes,
13 and we say that that is not an adequate way of
14 presenting the effect of the pandemic on the bereaved,
15 never mind others.

16 In terms of witness evidence, having looked at the
17 Every Story Matters plan and engagement, I just want to
18 address in short detail what we submit that the Inquiry
19 should do in terms of direct evidence from family
20 members going to the terms of reference.

21 It is entirely right what Mr Keith says, that you
22 have previously indicated that you will take evidence
23 from individuals where it sheds light on systemic
24 failures. We've taken account of that. That was made
25 clear to us in a follow-up letter from STI dated

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1 The Inquiry is outsourcing the gathering of the
2 evidence relevant to terms of reference in this sense,
3 and having it presented in an anonymised way, and then
4 considered in evidence. Apart from knowing who the
5 analysts will be generically and their skillsets, we
6 would also wish to understand who it is proposed will be
7 the authors of these reports and how will the Inquiry be
8 able to assess them, assess their weight, assess the
9 reliability of the information within them. All of this
10 is highly sensitive to the bereaved because, as we
11 understand it, this will be an important part of their
12 evidence.

13 The second point is perhaps more obvious, or just as
14 obvious, and that's engagement with us. We don't
15 dispute the fact that the Inquiry team or parts of it
16 have engaged with some of the bereaved, including the
17 Covid-19 Bereaved Families for Justice UK, and that's to
18 be applauded. But we have been told from the outset
19 that this isn't part of the legal process. We, as the
20 representatives of the bereaved, have been told that, in
21 terms, express terms, that it's not within the tasks
22 that we are permitted to undertake, and that, with the
23 greatest of respect, has created some problems. And we
24 particularly think and submit that it's important that
25 the Inquiry has dialogue over all of these matters with

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1 8 December, and that's why we have advanced this
2 spreadsheet of a proportionate number of bereaved family
3 members whom we say should be considered in Module 1 --
4 as Mr Keith says, there are about 20 of them -- and we
5 currently intend to take a similar approach in other
6 modules, and we've invited dialogue about that approach
7 with your team.

8 We're entirely on the same page as the Inquiry, as
9 the need for evidence in each module to be sufficient
10 but proportionate. We've made clear from the outset
11 that we entirely, with respect, agree that the Inquiry
12 must move as swiftly as possible but without cutting any
13 corners.

14 In terms of the dialogue about witnesses, it seemed
15 to us that the discussion is best undertaken in the
16 light of the Inquiry's list of provisional witnesses for
17 Module 1. However, in light of the comments made by
18 Mr Keith a little earlier, I will just take another
19 minute or two just to address some of those.

20 We've expressly on this spreadsheet put forward
21 a proportionate number of family members with regard to
22 preparedness. We're not asking the Inquiry to
23 investigate the circumstances of the individual deaths
24 of the loved ones of those bereaved persons.

25 I'll give but one very short anonymised example.

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1 One of the witnesses we've put forward is a frontline
2 doctor. She was at the frontline dealing with Covid.
3 She also has relevant other experience in the army. She
4 has evidence, illustrative evidence, of the lack of
5 preparedness which we say should be heard. It should be
6 heard because it's important to Module 1 and to
7 the Inquiry, but it's also important in engaging family
8 members in the evidence itself and having them valued
9 before the processes, the evidential processes of
10 the Inquiry, whatever other processes, for example, of
11 Every Story Matters, are.

12 I think those are my submissions, and thank you for
13 listening.

14 **LADY HALLETT:** Thank you, Mr Weatherby.

15 I appreciate your concern about disclosure and
16 people being ready by June 13, but I must say that I am
17 determined to start this Inquiry on 13 June for reasons
18 I've set out before because it is absolutely essential
19 if I am to make timely recommendations, and by that
20 I mean recommendations if not this year, certainly next
21 year, that we get on with hearing evidence. So I will
22 take a lot of persuading to postpone the start date. So
23 I'm afraid everybody, including the Inquiry team, have
24 to be aware of that fact, as I think they are.

25 As far as the additional informal process before

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1 Listening Exercise is not part of the legal process,
2 because I have always intended that my deliberations and
3 my gathering of information and my conclusions and
4 recommendations will be based in part on evidence I hear
5 directly from witnesses during the course of the public
6 hearings, and in part on the information gathered during
7 the Listening Exercise.

8 So there are a number of ways in which people whom
9 you represent, for example, can contribute to
10 the Inquiry. There will be some who may well be called
11 to deal with systemic failings. There will be some who
12 may be called in later modules to deal with the impact
13 upon them. There will be some who contribute by
14 agreeing to be interviewed and filmed, and the videos
15 will be played at each of the module hearings, and there
16 will be some who will share their experiences with
17 the Inquiry at community events, online, in person, on
18 the telephone.

19 I'd just ask, Mr Weatherby, before you advance this
20 kind of criticism of the Listening Exercise, for fear --
21 I know you don't intend this -- but for fear of putting
22 people off engaging, that people do check their facts
23 and see whether or not there is the detail there that
24 people need to understand the exercise.

25 I will need the engagement of members of the public

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1 Rule 10 is concerned, it is intended to assist
2 core participants to participate effectively in
3 the Inquiry process, not hinder. In fact, I believe
4 that the first suggestion aired in public came from
5 Ms Mitchell on behalf of the Scottish Bereaved.
6 I understood at that time that it was welcomed. If that
7 is not the case, then please remember, Mr Weatherby,
8 that it is optional, and you only have to comply or
9 engage in the informal process if you think it would be
10 helpful to your representation of Bereaved Families for
11 Justice United Kingdom.

12 As far as the Listening Exercise is concerned,
13 I have listened to complaints that have been made in the
14 past about the difficulty in obtaining the information
15 you require, although I have to say when I made
16 enquiries I discovered a very considerable amount of
17 information available, but I do accept that it could be
18 in one place, made even -- given even more detail, to
19 help those whom you represent understand what is
20 happening.

21 A number of bereaved groups are co-operating with
22 the Listening Exercise because they understand that this
23 is our way of trying to ensure that people's voices are
24 heard.

25 I'm not sure what you mean about being informed the

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1 in the United Kingdom if I am going to be able to
2 produce conclusions and recommendations that, if
3 implemented, could reduce the suffering of the kind that
4 those whom you represent have already suffered for other
5 people in the future. So I need as much assistance as
6 possible, and I welcome your continued assertions that
7 that co-operation will be forthcoming from the
8 organisation that you represent.

9 Thank you very much, Mr Weatherby.

10 Mr Lavery.

11 **Submissions on behalf of the Northern Ireland Covid-19
12 Bereaved Families for Justice by MR LAVERY**

13 **MR LAVERY:** Good afternoon, my Lady. I hope you can hear
14 me.

15 **LADY HALLETT:** I can. I see you on the gallery view,
16 thank you.

17 **MR LAVERY:** My Lady, as you know and as I've pointed out
18 before, I represent the Northern Ireland Covid-19
19 Bereaved Families for Justice, and indeed they are
20 gathered today in Belfast to follow today's events.
21 Their organisation is an important support mechanism for
22 them through this complex legal process, but also a very
23 difficult emotional process for the bereaved families to
24 follow this, and it has to be explained to them by us
25 exactly what is happening at each step of the way.

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1 They will welcome, my Lady, your robust approach
2 towards the forthcoming hearing date, and it is their
3 desire that the hearings should be taking place
4 expeditiously and as quickly as possible. But it's only
5 right as well, my Lady, that we take this opportunity to
6 highlight difficulties that we're facing and that the
7 process has not been straightforward so far, and from
8 the perspective of the Northern Ireland families, indeed
9 all of the bereaved families, that we have concerns
10 about the rate of disclosure and the provision of
11 witness statements. We see this as being a very tight
12 process to be able to manage within such a short period
13 of time.

14 In particular in relation to the extent of
15 disclosure from Northern Ireland, and indeed all of the
16 devolved jurisdictions, there is so far unfortunately
17 a dearth of information, firstly as to what the Inquiry
18 have, secondly as to what might be coming, and we say
19 that in the context of the absence of Rule 9 requests
20 and indeed what is needed.

21 There are five witness statements that have been
22 made available, but the only one that relates to
23 Northern Ireland that has been made available is the one
24 that in fact our families provided to the Inquiry.

25 So I say that not to criticise, my Lady, but to give

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1 make such a request at the conclusion of evidence, but
2 my concern is that we may be faced with more requests
3 because of a lack of preparedness, in terms of rushing
4 this module. I do not and my families do not want to
5 have the date moved, my Lady.

6 We want expedition, but of course not at the expense
7 of excellence or parts of the truth, and we appreciate
8 that the task of the Inquiry, your Ladyship's task and
9 the task of the Inquiry team, is enormous. So the
10 observations made by ourselves and Mr Weatherby should
11 be seen in that context, and that we're here to assist
12 and ensure the Inquiry is as thorough and comprehensive
13 and forensic as possible.

14 But in terms of witness statements, my Lady, our
15 calculations -- a rough calculation is that we have
16 received about 12% of the overall statements of
17 evidence. We have carried out an audit of the material
18 that we have received by way of disclosure, and we will
19 be writing to the team in detail identifying parts that
20 we feel have been omitted, including reference to
21 organisations and even body heads, which we're not sure
22 whether or not they have been included and to what
23 extent they feel that their evidence may be relevant.
24 This is not the forum, my Lady, to go into that in
25 detail, and we will correspond with the Inquiry team

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1 your Ladyship an idea of the scale of the task that we
2 face in those circumstances and what we might face as
3 a difficulty. And your Ladyship will understand that
4 this hinders our ability to assist the Inquiry team and
5 take part in the process in as meaningful and
6 substantive a way as we would like, and indeed we hope
7 that your Ladyship would like, and the Inquiry team.

8 So these submissions are, to some extent, a request
9 for more inclusion. We adopt the submissions of
10 Mr Weatherby. By inclusion I mean the Rule 9 requests,
11 and I reiterate that, and indeed some input -- more
12 input in relation to experts. I'll deal with that in
13 the Northern Ireland context in a second. I won't be
14 speaking long this afternoon, my Lady.

15 But at the moment we currently face the prospect of
16 being given material even after the Inquiry starts, and
17 this is going to obviously present difficulties in terms
18 of our input, our preparedness, and indeed, my Lady,
19 what we can explain to our families as to what is
20 happening and the context of all of that.

21 There may be material that emerges then in the
22 course of evidence which unfortunately may lead to
23 a greater number of requests to ask questions in
24 a follow-up way under Rule 10. I welcome what Mr Keith
25 said earlier, that there will be that opportunity to

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1 about that.

2 Now, in relation to the expert evidence, we share
3 the view with the other devolved jurisdictions that the
4 expert evidence is then, in terms of dealing with the
5 preparedness of the devolved jurisdictions and indeed
6 Northern Ireland, and we welcome the acknowledgement of
7 Mr Keith today of that fact and that the team have asked
8 two of the experts to go back and prepare something on
9 Northern Ireland and the devolved nations in particular.

10 There are matters that are cropping up in
11 disclosure, my Lady, that we see as necessary in terms
12 of dealing with Northern Ireland that do require, we
13 say, specific input, analysis and comment from an expert
14 that relate to Northern Ireland. This is in addition to
15 what we have highlighted on previous occasions, the
16 unique features of Northern Ireland, the relationship
17 between Northern Ireland and the Republic of Ireland,
18 the single epidemiological unit that is the island of
19 Ireland, and how the Northern Ireland institutions and
20 indeed there are cross-border bodies, how they dealt
21 with preparedness.

22 Secondly, my Lady, the impact of not just no
23 government but one might describe it as dysfunctional
24 government on preparedness. And then of course the
25 unique Northern Irish system of healthcare. And, again,

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1 it gives me no pleasure to describe it in this way, but
2 the failed and indeed broken state of the
3 Northern Ireland healthcare service, even in comparison
4 to other parts of the UK, my Lady, and I have given
5 statistics on that on previous occasions.

6 One feature which is beginning to emerge as well,
7 which we haven't looked at before, is the impact on the
8 Northern Ireland civil service of Brexit preparations
9 and how that impacted on the ability of the
10 civil service to deal in a normal way with preparedness
11 for a pandemic. Of course, around this time there was
12 the unique impact that the threat of a no-deal Brexit
13 was going to have on Northern Ireland in particular. So
14 that is an issue which has emerged.

15 These are all issues we say that, yes, it's welcome
16 that these two experts are going to be asked to look at
17 Northern Ireland in particular. But we had named
18 an individual who has specific Irish -- Northern Ireland
19 and Republic of Ireland -- expertise and who we regarded
20 as extremely competent and perfectly placed to deal with
21 Northern Ireland devolved issues.

22 We assume from the response today that that is not
23 going to be looked at in the context of Module 1.
24 Indeed, it would be impossible to see how somebody could
25 be instructed in such a short timescale. But we do

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1 this process, my Lady.

2 So those are my submissions this afternoon on behalf
3 of those families that I represent who, as I say, are
4 listening together in a room in Belfast, my Lady.

5 **LADY HALLETT:** Thank you very much indeed, Mr Lavery. I'm
6 very grateful for your assistance.

7 I know you'll work with the Inquiry team to ensure
8 that the issues you've raised are properly addressed.
9 We do all share the same aims, as you say, and I know
10 that your approach will remain constructive.

11 As for disclosure, as I said to Mr Weatherby
12 King's Counsel, I do understand the concerns, and
13 I promise you we'll do our very best to ensure that you
14 get the information you need in sufficient time to
15 prepare properly.

16 I don't want to go down this path, but as Mr Keith
17 mentioned earlier today, in exceptional circumstances
18 I do have powers to ensure that people have been
19 questioned appropriately and thoroughly. I can recall
20 witnesses. I can ask people for further written
21 submissions. So I hope that between us we can find ways
22 to ensure that we're all ready to start these hearings
23 on June 13, because I know that you understand why I'm
24 so keen to get on.

25 So thank you very much for your submissions, and

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1 feel, my Lady, that in terms of modules going forward
2 that there is a place for a Northern Irish expert to
3 comment on the very unique characteristics that we
4 continue to explain to your Ladyship and to
5 the Tribunal. But that's not going to happen several
6 weeks before the hearing date.

7 So really, I just want to reiterate again that we
8 understand the mammoth task that is before your Ladyship
9 and the Inquiry team, and that we are dealing with as
10 well, and the purpose of our involvement in the Inquiry
11 and in these preliminary hearings is to influence and
12 contribute to this process, and these submissions
13 hopefully will be seen just exactly in that context, and
14 nothing more than that.

15 We feel that this is the essence of the role of
16 a core participant, to influence and contribute, to
17 assist, and indeed my clients do feel that they have,
18 even so far, contributed in small ways to the direction
19 of the Inquiry and hope to do this even further in due
20 course.

21 We particularly welcome the inclusion of the witness
22 statement from our group and the Northern Ireland
23 bereaved families, and we feel that this, along with the
24 other matters, should reflect the very key role that the
25 bereaved families as core participants should play in

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1 I now need to ask whether it's best to break? Yes. I'm
2 told it is best to break.

3 So thank you, Mr Lavery, and please send my best
4 wishes to those who are gathered there with you. As you
5 know, I always remember the time when I visited Belfast.
6 Who could forget it? It was extraordinarily moving.
7 And I shall be visiting Belfast again during the course
8 of the Inquiry, I hope more than once.

9 **MR LAVERY:** I will, my Lady. Thank you.

10 **LADY HALLETT:** Thank you.

11 Two o'clock, please.

12 **(12.57 pm)**

(The short adjournment)

14 **(2.00 pm)**

15 **LADY HALLETT:** Good afternoon, everyone.

16 I think next it's time to call on Ms Mitchell
17 King's Counsel. Ms Mitchell.

18 **Submissions on behalf of Scottish Covid Bereaved by**
19 **MS MITCHELL**

20 **MS MITCHELL:** My Lady, I'm obliged.

21 The Scottish Covid Bereaved wish to address Rule 9s,
22 disclosure and delay, and make some brief comments on
23 matters arising this morning.

24 We are obliged to Counsel to the Inquiry and the
25 team for providing us with an update on the Rule 9

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1 procedure and how that is progressing.

2 As perhaps properly anticipated by Mr Keith KC, it
3 won't come as a surprise to the Inquiry to understand
4 that the Scottish Covid Bereaved are concerned that
5 a considerable number of the statements contained
6 insufficient detail and, as was stated, posed more
7 questions than they answered, particularly as some of
8 these came from central government departments.

9 Further, the Scottish Covid Bereaved are worried to
10 hear that the Inquiry's considered that it should have
11 been clear to those organisations that the statements
12 simply would not provide the Chair with the detail that
13 she will require in order to consider responsibility for
14 and involvement in the matters set out in the Inquiry's
15 provisional outline of scope.

16 If it should have been clear to those organisations
17 that the information provided would be insufficient,
18 this suggests a lack of co-operation with the work of
19 the Inquiry at the most fundamental level of provision
20 of specific information requested.

21 We are grateful in respect of the transparent way in
22 which Counsel to the Inquiry and the Chair is dealing
23 with this matter, and doubtless those in receipt of
24 Rule 9s, which have been responded to in a less than
25 satisfactory way, will now require to do so in the

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1 Rule 9s are properly understanding and implementing
2 their task, and supplying the correct documents that are
3 sought by the Inquiry is undermined when, as in this
4 case, there appears to be a wholesale departure from the
5 proper application of the disclosure process.

6 This morning, we understand that these are not the
7 only bodies which have not carried out their task
8 properly. Senior Counsel to the Inquiry has stated it
9 may not be malice but rather a failure to understand
10 what is being asked for, and indeed that is a statement
11 with which we would as yet not demur. However, the
12 outcome is the same, that the proper test is not being
13 carried out and, as a result, the relevant documents are
14 not being supplied.

15 Senior Counsel to the Inquiry has set out the work
16 that is being done and, clearly, strenuous efforts are
17 being made to ensure we are ready for the hearings, but
18 this work is undermined if the job carried out by those
19 scrutinising their own documents and deciding what falls
20 within it is not carried out properly.

21 Now, the following proposition I make may be
22 something that's already done. Indeed, I would be glad
23 to hear that if it was. But if not, going forward,
24 might I suggest that those being asked for disclosure
25 are required to complete a schedule of disclosure which

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1 timescale set out by the Chair.

2 The way in which the Rule 9 response has been dealt
3 with, however, does not provide the Scottish Covid
4 Bereaved with confidence that, where appropriate, the
5 same parties understand and are properly implementing
6 their disclosure duties in respect of relevant
7 documents.

8 Confidence in this process is further undermined if,
9 as it appears, the Department for Levelling Up, Housing
10 and Communities has disclosed a considerable proportion
11 of the material which is not in fact responsive to
12 a Rule 9.

13 The material disclosed apparently is sometimes far
14 too granular in nature. The question asked must be: if
15 regard is not being had properly to the Rule 9 and the
16 documents provided not responsive to it, has the
17 relevant process of assessment been carried out properly
18 at all? Might yet there be a considerable amount of
19 material which has not been provided that is in fact
20 responsive to that request?

21 The Scottish Covid Bereaved are also concerned to
22 understand that the Office of the Chief Medical Officer
23 has not properly undertaken the request to inform
24 relevant to Module 1 and has rather opted to provide
25 everything. Again, confidence in those receiving

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1 indicates all the documents that are being considered
2 and then sets out separately what documents are and are
3 not being provided to the Inquiry, with a brief
4 description thereof. This would allow the Inquiry to
5 ensure, firstly, that the proper test is being applied,
6 as the haver will have to, as it were, show their
7 thinking, and, secondly, to allow any documents which
8 would appear to the Inquiry to be relevant which have
9 not been included to be called for.

10 This would go some way in addressing what
11 Donald Rumsfeld famously once described as the unknown
12 unknowns, those things which we simply cannot know
13 because we do not know about them. It would also
14 provide a further testing tool to ensure that disclosure
15 is being properly carried out and in turn bolster
16 confidence in the disclosure process.

17 We note that the Inquiry considers there is
18 sufficient time before the beginning of the Inquiry's
19 hearing on 13 June to rectify these matters but has made
20 it clear that that is only if those who have provided
21 statements consider carefully any further requests that
22 have been received and direct themselves towards
23 the Inquiry's list of issues when providing further
24 statements.

25 We note the Chair's comments this morning on the

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1 start date of 13 June remaining in place.

2 The Chair's concern about any further delay is,
3 of course, the same concern that the Scottish Covid
4 Bereaved have. Whilst it is important to start the
5 evidence, it cannot be done at the expense of proper
6 disclosure. The current amount of disclosure is very
7 substantial, and we're working through what we currently
8 have. Given the numbers quoted this morning, we expect
9 a very considerable number more, perhaps some of it even
10 very close to or during the hearing date.

11 Those we represent are anxious that something
12 important might be missed by all concerned, or the
13 import of a document not be realised until a later date.
14 We have of course explained to those we represent
15 the Inquiry process is not like a criminal trial and
16 that, if this happens at any point, if necessary, the
17 Chair can recall a witness, and this of course, as
18 Mr Keith has stated, would only be used when it was
19 entirely necessary.

20 In our written submissions, we asked, as a comfort
21 to those concerned in this regard, the Chair would
22 confirm that if at a later stage information disclosed
23 that ought to have been available for the purposes of
24 preparations of questioning witnesses who have given
25 evidence, the Inquiry can and will recall such witnesses

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1 assistance if, in the course of giving evidence,
2 for example, a witness has raised a new issue which had
3 not been previously properly considered.

4 This process was considered in fact to avoid
5 additional formal administrative process in obviating
6 the need to raise the matter with the Chair.

7 Can we be allowed an opportunity to assure other
8 core participants that this process has been used north
9 of the border to great effect? On occasion, the request
10 for further issues to be explored is taken up by Senior
11 Counsel to the Inquiry, but if not, usually
12 an explanation is provided as to why they will not be
13 doing so. This not only allows a core participant to
14 once again consider whether or not to follow that up
15 under Rule 10 procedure but also allows them to address
16 what will be said against them to the Chair in the
17 formal application.

18 Of course, if core participants do not want to avail
19 themselves of the opportunity, as has been noted by both
20 Mr Keith and the Chair, the opportunity to seek to
21 persuade Counsel to the Inquiry of the relevance of
22 a certain line of evidence in this informal matter need
23 not be taken up.

24 Moving on to the question of parity of disclosed
25 material. Can we assure the Inquiry that in relation to

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1 or seek such evidence in written form. We are therefore
2 very much obliged to Mr Keith for conjoining in this
3 suggestion and for the Chair this morning in confirming
4 it.

5 As I'm sure will be appreciated, there is
6 understandable anxiety when lawyers raise these issues,
7 but this assurance goes some way to assuring those who
8 are concerned to ensure that nothing which is relevant
9 and necessary, but perhaps which has not been provided
10 timeously, will still be considered in evidence by the
11 Chair.

12 I'd like briefly to move on and make some further
13 comments about matters arising this morning, my Lady.

14 My Lady is correct, it was the Scottish Covid
15 Bereaved that suggested what might be described as
16 an informal second sift procedure in an application to
17 Senior Counsel to the Inquiry once a witness has given
18 evidence to seek to persuade him that a line hitherto
19 which has not been taken up be revisited.

20 I agree with the submission made by Mr Keith this
21 morning that this should not be considered an additional
22 administrative task. Rather, it is an opportunity to
23 allow a second bite of the cherry to core participants
24 to participate in the process of eliciting relevant
25 evidence from a witness. This is particularly of

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1 parity, in terms of the amount of material being
2 recovered, it is not expected by the Scottish Covid
3 Bereaved. What is expected, as I'm confident has
4 repeatedly been recognised by the Chair, that issues
5 which are considered in relation to England and the
6 other countries are explored to the same extent as in
7 Scotland.

8 Moving on to the issue of the Every Story Matters.
9 The difficulties in understanding in relation to Every
10 Story Matters do not seem to exist in the same way north
11 of the border in Scotland. The primary issue to be
12 resolved is the interaction of the process with the
13 listening operation taking place in respect of the
14 Scottish Inquiry. We appreciate that discussions are
15 ongoing in this regard, and no doubt further information
16 will be provided by both Inquiries in due course.

17 Finally, as before, the Scottish Covid Bereaved
18 welcomes the opportunity to be part of the opening
19 videos and have engaged directly with the team from the
20 UK Inquiry in the planning operation. They now look
21 forward to being involved in providing their stories in
22 this process.

23 These are the submissions for the Scottish Covid
24 Bereaved.

25 **LADY HALLETT:** I'm extremely grateful, Ms Mitchell. Thank

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1 you very much indeed.

2 In the light of the submissions made earlier by
3 Mr Weatherby King's Counsel and Mr Lavery
4 King's Counsel, and knowing what you were going to say
5 from your written submissions about disclosure, I have
6 been discussing that issue further with the Inquiry
7 team, and I can assure everyone, as I did this morning,
8 that I'm very conscious of the problem, and everything
9 is being done that can be done to ensure that you can
10 all be properly prepared by the time I intend us to
11 start on June 13. But I do understand the concerns, and
12 they're very properly raised, and that's obviously one
13 of the points of hearings of this kind.

14 Thank you very much for your other submissions,
15 particularly the support of those whom you represent in
16 contributing to Every Story Matters, the
17 Listening Exercise. As I said this morning, again, it
18 is absolutely vital for me to have that support if I'm
19 going to make recommendations that may reduce suffering
20 and deaths in the future.

21 Thank you very much indeed, Ms Mitchell.

22 Next we have Ms Heaven, Kirsten Heaven.

23 **Submissions on behalf of Covid-19 Bereaved Families for**
24 **Justice Cymru by MS HEAVEN**

25 **MS HEAVEN:** Good afternoon, my Lady.

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1 It was, of course, Mr Keith King's Counsel who, at
2 the last preliminary hearing, stressed the important
3 role played by core participants in what he himself
4 termed "this collaborative forensic process". Mr Keith
5 explained that one of the major ways in which
6 core participants participate in an Inquiry is, in his
7 words, "by way of being able to scrutinise the disclosed
8 relevant documentation for themselves and thereby assist
9 with the identification of suitable witnesses to be
10 called and with the important process by which lines of
11 inquiry and topics are drawn up for the purposes of
12 questioning those witnesses".

13 My Lady, we of course agree, but we have still not
14 been able to start this process because in Wales we
15 simply have very limited disclosure.

16 My Lady, of course you are aware of the state of
17 disclosure in relation to Wales for Module 1, but it's
18 important to summarise what we have thus far been given,
19 so that the Welsh public understand the position facing
20 the Cymru group in this public inquiry.

21 My Lady, as at today's date, not a single Welsh
22 witness statement has been disclosed from a witness of
23 fact or from the Welsh Government. In terms of
24 documents, we have received 26 from the Welsh Government
25 Association, 12 from the Welsh Council for Voluntary

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1 **LADY HALLETT:** Good afternoon.

2 **MS HEAVEN:** I appear today on behalf of the Covid-19
3 Bereaved Families for Justice Cymru. My Lady, I'll make
4 some short submissions today, but I won't be covering
5 all the topics on the agenda.

6 My Lady, it will come as no surprise that I must
7 start with the submissions on the topic of Rule 9 and
8 disclosure.

9 The Cymru group recognise that this Inquiry has set
10 itself a punishing schedule, and of course this is
11 entirely right. The Welsh Government's failure to
12 prepare for the Covid-19 pandemic had catastrophic
13 consequences, and so it is vitally important that the
14 full extent of these failures are publicly exposed and
15 identified so that all lessons can be learnt, and this
16 must happen sooner rather than later.

17 The Cymru group does support this Inquiry's attempts
18 to get to the heart of the matter in an efficient and
19 expeditious matter, and the Cymru group is not asking
20 you to delay further the Module 1 hearings.

21 However, my Lady, as you will of course agree,
22 acting expeditiously must be balanced against ensuring
23 that the Welsh bereaved can participate in Module 1,
24 which your team have recognised covers extensive and
25 complex matters.

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1 Action, 134 from Public Health Wales, and 94 from the
2 Welsh Government. The 94 documents from the
3 Welsh Government were disclosed on 21 April at 5.32 pm.

4 Some of these documents are clearly of real
5 significance to some aspects of the historical attempts
6 to prepare for a pandemic going back nearly 20 years in
7 Wales. However, they are piecemeal, and their
8 significance is unclear, as there is no witness
9 statement explaining the content and context of the
10 document.

11 My Lady, it is important to note that it's not
12 particularly helpful to receive disclosure in the
13 absence of a corresponding witness statement. Many of
14 the names of the key players are not contained within
15 these historical documents, and we have not seen the
16 corresponding Rule 9 requests that may have explained
17 the provenance and significance of the various
18 documents. This of course makes it difficult for the
19 Cymru group to identify relevant witnesses.

20 The consequence of this piecemeal and limited
21 disclosure for Wales is stark. As at today's hearing,
22 we are seven weeks away from the start of Module 1, the
23 Module 1 hearings, and as at today's hearing we are
24 three weeks away from having to respond to your Counsel
25 to the Inquiry's evidence proposals for each witness you

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1 intend to call to give live evidence.

2 To be clear, and so that the Welsh public understand
3 what an evidence proposal is, an evidence proposal will
4 set out what your Counsel to the Inquiry proposes to ask
5 of each witness, and core participants can then raise
6 any comments and submissions as to any additional issues
7 which they wish your CTI to raise when they first
8 question the witness.

9 As you know, my Lady, questioning must be based on
10 the evidence in the disclosure. Responding to the
11 evidence proposals will, in reality, be the most
12 important opportunity that all non-state
13 core participants like the Cymru group will have to seek
14 to persuade your CTI to ask witnesses about the issues
15 of concern to them.

16 We understand from what Mr Keith said this morning
17 that we are to receive statements from the
18 Welsh Government, I think he said in the next two weeks.
19 If we get disclosure at the end of this period, this
20 would leave a week for us to consider the
21 Welsh Government statements and disclosure and then
22 respond to the CTI evidence proposals. If this is the
23 position, then you will understand why the Cymru group
24 are concerned about being able to effectively
25 participate.

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1 Module 1 hearing begins.

2 My Lady, it would be unfortunate if the ability of
3 the Cymru group to effectively participate was limited
4 in Module 1.

5 My Lady, as you've already stated, when you granted
6 the group core participant status, that you consider
7 that the Covid-19 Bereaved Families for Justice Cymru is
8 best placed to assist the Inquiry to achieve its aims by
9 representing the collective interest of the broad
10 spectrum trouble of those bereaved by Covid-19 Wales in
11 relation to Module 1. This is no doubt in part because
12 you've seen and recognised that the Cymru group have
13 been tirelessly campaigning on all the issues that this
14 Inquiry will consider, but particularly on the
15 widespread failure of the Welsh Government and the
16 healthcare system in Wales to prepare for a pandemic.

17 My Lady, as you also know, Wales, unlike Scotland,
18 does not have its own public inquiry. Mr Drakeford,
19 First Minister for Wales, has consistently refused to
20 establish a Welsh public inquiry on the grounds that the
21 actions of the Welsh Government must be and will be
22 scrutinised in detail alongside the actions of
23 the United Kingdom Government and other devolved nations
24 in this Inquiry.

25 This public inquiry and Module 1 is therefore the

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1 My Lady, in two days the Cymru group and all other
2 CPs must make submissions in writing as to what
3 witnesses ought to be called to give evidence in
4 Module 1. It is impossible to see how this can be done
5 properly or at all -- and certainly in relation to
6 Wales -- when no witness statements have been disclosed,
7 where we have very limited disclosure, most of which
8 makes no reference to names, and we've not been formally
9 told where responsibility lies for the core
10 decision-making on Module 1 issues in Wales.

11 It is now inevitable that the Cymru group will find
12 it very difficult to identify all relevant witnesses for
13 your Inquiry to consider for Module 1 in two days' time.
14 It is, therefore, of concern that we are three weeks
15 away from responding to evidence proposals and we've not
16 seen a single Welsh witness statement.

17 My Lady, in the circumstances, it's not unreasonable
18 for those whom I represent to feel that the Inquiry has
19 set them an unrealistic and impossible task. It is
20 simply not realistic to expect bereaved individuals who
21 have come together as a group to identify all the issues
22 of concern to their nation, in this case Wales, in
23 a matter of weeks or maybe days.

24 We also understand that it's now inevitable that
25 disclosure will continue up until the day when the

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1 only opportunity for the bereaved people of Wales to
2 seek to ask questions and seek answers and
3 accountability on the issues of pandemic preparedness in
4 Wales.

5 My Lady, the next issue of concern is really to seek
6 to understand why the Inquiry finds itself in this
7 position generally, and in relation to Wales.

8 The Cymru group of course recognises that this
9 Inquiry has been seeking to obtain documents as quickly
10 and efficiently as possible, and we know that
11 the Inquiry has faced understandable difficulties in
12 relation to the redaction, as outlined in the last
13 Module 1 preliminary hearing.

14 We also understand that in certain circumstances the
15 Rule 9 process is an iterative process. However, as has
16 already been expressed this morning by other non-state
17 core participants, it is deeply concerning to the Cymru
18 group to learn, in your latest update, that significant
19 delay in disclosure was caused by the actions of certain
20 state bodies.

21 The Cymru group consider that it is essential that
22 the Welsh public are kept informed of the timeliness and
23 adequacy of the co-operation received by this Inquiry
24 from the Welsh Government witnesses. This is
25 particularly important given what I said a moment ago

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1 about the reliance placed on this Inquiry by the
2 Welsh Government in their refusal to hold a public
3 inquiry in Wales.

4 The Cymru group note that the Welsh Government
5 started preparing for this public inquiry over 18 months
6 ago. The Cymru group note that at today's date, three
7 out of four of the witness statements prepared by the
8 Welsh Government, including that prepared by
9 Mark Drakeford, have still not been finalised and none
10 of these statements, as we know, have been disclosed.

11 This is also the case for the statements made by the
12 chief medical team for Wales. They are also still in
13 draft form. This includes statements from
14 Sir Frank Atherton, Vaughan Gething, Dr Andrew Goodall,
15 Dr Quentin Sandifer for Public Health Wales. In fact,
16 the only finalised Welsh Government related statements
17 appear to be from Chris Llewelyn and from
18 David Andrew Goodall, but they've not been disclosed.
19 The statement from Dame Deirdre Hine is also still in
20 draft form.

21 The Cymru group did ask the Inquiry to clarify
22 whether the Welsh Government was one of those state
23 bodies that had provided an insufficient response to
24 your request for disclosure.

25 The Cymru group welcomes Mr Keith's clarification

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1 Welsh Government to ensure that there is full and timely
2 disclosure for all future modules.

3 For transparency, the Cymru group ask the Inquiry to
4 publish all directions issued to Welsh Government and,
5 indeed, all versions of witness statements that have
6 been received by the Inquiry from the Welsh Government.
7 This will allow the core participants and the Welsh
8 public to understand exactly what evidence the
9 Welsh Government did not disclose to this Inquiry when
10 first requested.

11 My Lady, as you will of course appreciate,
12 disclosure at the last moment merely risks state bodies
13 such as the Welsh Government escaping effective scrutiny
14 by those bereaved by the Covid-19 pandemic in Wales.

15 My Lady, the Cymru group is very reluctant to call
16 into question your current timetable for the Module 1
17 public hearings and, as I've already said, we're not
18 asking you to delay those hearings. My Lady, the Cymru
19 group therefore ask you to take all necessary steps to
20 ensure effectively participation moving forward.

21 My Lady, you're asked to ensure that all Welsh witnesses
22 now adhere strictly to whatever deadlines you impose
23 from today and that witness statements are disclosed as
24 a matter of urgency, and ideally by the end of this
25 week.

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1 today and his explanation that in the first draft of the
2 Welsh Government witness statement there was a notable
3 absence of supporting exhibits in relation to some
4 areas.

5 As a result, we now understand that the Inquiry had
6 to go back to the Welsh Government and raise the matter
7 with them and make clear that, whatever assertions
8 statements make, they must be properly supported by
9 exhibits. In other words, they must be properly
10 supported by the documentary evidence that we know is
11 held by the Welsh Government.

12 The Cymru group do consider that it is simply
13 unacceptable that the Welsh Government did not disclose
14 all the documents they ought to have disclosed to this
15 Inquiry in a timely manner. As I've already mentioned
16 a moment ago, the Welsh Government have been preparing
17 for this Inquiry for a significant period of time. The
18 draft terms of reference for this Inquiry were published
19 on 11 March 2022, and the Welsh Government had sight of
20 the Module 1 provisional outline of scope on
21 21 July 2022. The Cymru group consider that the
22 Welsh Government have been well aware for some time of
23 the documents they ought to disclose to this Inquiry,
24 and that such documents must be disclosed at the first
25 available opportunity. The Cymru group urge the

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1 My Lady, I now turn to another topic, which is the
2 Module 1 issues list.

3 The Module 1 issues list is very broad and
4 comprehensive and of course that's welcomed. However,
5 in part it does lack clarity and, as I know you
6 understand, that does make it difficult for some
7 non-state core participants to fully understand what
8 will be covered in Module 1.

9 At the last preliminary hearing, Mr Keith explained
10 that high level preparedness, including high level
11 funding and resourcing, would be considered but that
12 sectoral and operational readiness would be addressed in
13 later modules. Mr Keith has very helpfully addressed
14 this matter again today and provided some more clarity,
15 and that does assist.

16 However, there is still some uncertainty on behalf
17 of my clients in relation to issue 4, public health
18 services.

19 We do support and echo the submissions made by
20 Mr Weatherby this morning, and simply add that the Cymru
21 group asks for more clarity on how far Module 1 will be
22 considering the high level structural preparedness of
23 NHS Wales for an airborne respiratory virus pandemic,
24 including matters such as the state of the Welsh
25 hospital estate and its infrastructure and funding. We

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1 don't consider that these issues can be classified as
2 operational matters. It's also not clear whether
3 issue 4 will cover the Welsh social care sector and the
4 structural interface with Welsh hospitals from the
5 funding perspective.

6 The Cymru group further note that at present no
7 chief executive officer is to be called in Module 1 from
8 NHS Wales to deal with structural planning. It is
9 therefore hard to see how Module 1 will be able to
10 consider, for example, preparedness within the Welsh NHS
11 estate. The Cymru group therefore request clarity on
12 the scope of issue 4, as well as the level of detail
13 that the Inquiry expects to be able to go into, and to
14 make clear where the above issues that I've just
15 outlined will fall to be examined if it's not Module 1.

16 As I've said, the Cymru group consider that such
17 high level structural matters ought to be considered in
18 Module 1, not least because lessons need to be learnt in
19 Wales as soon as possible, given the continuing issue
20 with high levels -- and indeed very high levels -- of
21 hospital acquired Covid-19 in Wales. Not only that, we
22 understood the position to be that structural and
23 funding matters would not fall within later modules.

24 My Lady, I now turn to the issue of expert
25 witnesses.

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1 to health and inequality in Wales, and an expert in
2 Welsh devolution.

3 The Cymru group note and support the written request
4 for an expert to deal with Northern Ireland pandemic
5 preparedness. Now, although we're very close to the
6 Module 1 hearings, the Cymru group do ask you to
7 consider the viability and utility of instructing
8 an expert with extensive experience in pandemic
9 preparedness in Wales.

10 The Cymru group know, and they have informed
11 the Inquiry, that following devolution steps were taken
12 in Wales to review systems and processes in order to
13 prepare for a pandemic. In addition, the Inquiry can
14 now see from the latest Welsh Government disclosure that
15 pandemic preparatory work was being undertaken from at
16 least 2009 and in fact earlier.

17 The Cymru group are concerned to understand, then,
18 how this Inquiry is intending to adduce and analyse the
19 historical factual information on Welsh pandemic
20 preparedness in the absence of a Welsh expert. It would
21 appear that the Inquiry is not intending to call
22 witnesses of fact to deal with what steps were taken in
23 Wales from 2009 onwards.

24 The Cymru group consider that if such an expert was
25 instructed, they could review and analyse the disclosure

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1 As my Lady will be aware, the Cymru group have
2 already made written submissions on a number of expert
3 reports for Module 1 and have had sight of the most
4 recently disclosed reports.

5 What is clear from all these reports is that the
6 devolved administrations, including Wales, receive
7 insufficient analysis and in some instances virtually no
8 analysis. In some reports there appears to be a lack of
9 data in respect of Wales, and many of the reports simply
10 lack a robust comparative analysis of the actions of the
11 devolved administrations than the UK Government.

12 Public Health Scotland have raised a concern about
13 the limited treatment of public health matters
14 specifically related to Scotland in the expert reports.
15 The Cymru group agree with this concern, and we make the
16 same point in relation to Wales.

17 Now, we do of course understand that the Inquiry has
18 asked for further work to be undertaken by certain
19 experts on the devolved nations, and of course we
20 welcome this, but we very much hope that these further
21 draft expert reports will be disclosed imminently.

22 Notwithstanding this request, the Cymru group do
23 repeat their earlier requests that have been made in
24 writing that the Inquiry instruct expert witnesses to
25 deal with the Welsh healthcare and legal system relevant

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1 and provide an independent opinion on Welsh preparedness
2 from devolution onwards. This would not only
3 significantly assist you, my Lady, but it would also
4 assist the Welsh bereaved in effectively participating
5 in the Inquiry. The Cymru group stands ready to suggest
6 a list of possible experts with the relevant expertise
7 in this area, if you so require.

8 Finally, the Cymru group wish to add that they were
9 greatly assisted by having sight of the instructions to
10 Dr Kirchelle, which were very specific and detailed, and
11 it is hoped that the Inquiry continues to adopt this
12 constructive approach moving forward, so that any gaps
13 in expert instructions can be identified early on by all
14 participants.

15 The Cymru group, finally, support the clarification
16 requested to the Kirchelle instructions made by
17 NHS Scotland. In short, in instructions to experts
18 there should be absolute clarity whether devolved
19 nations are being referred to, as opposed to England
20 and/or the United Kingdom.

21 My Lady, I now turn to the procedure on evidence
22 proposals in Rule 10.

23 I have already made the general point in relation to
24 the time left available to consider any disclosure
25 before responding to CTI's evidence proposal. As we

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1 have already indicated in our written submissions,
 2 an inevitable consequence of late and delayed disclosure
 3 is that bereaved core participants will struggle to
 4 fully respond to witness proposals on CTI's deadline.
 5 We will of course do our best if disclosure is
 6 forthcoming imminently. However, delayed and staggered
 7 disclosure may well result in bereaved core participants
 8 having to submit topics for consideration after the
 9 deadlines proposed, and it's very much hoped that
 10 the Inquiry legal team will be understanding here and
 11 set aside sufficient time to consider all the topics
 12 submitted by core participants.

13 In terms of the questioning of witnesses by counsel
 14 other than CTI, Mr Keith has provided very useful
 15 further clarification today on how this is likely to
 16 work, and we've very carefully noted and taken account
 17 of what he has said.

18 The Cymru group strongly supports the submissions
 19 that have already been made in previous hearings and
 20 today by Mr Weatherby on the procedure in relation to
 21 Rule 10, and on the importance of the bereaved, through
 22 their counsel, being permitted in certain circumstances
 23 to ask time-limited questions after CTI.

24 Allowing this to happen will enhance the ability of
 25 the Inquiry to involve the core participants in

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1 disclosure will likely occur after the response to CTI's
 2 witness proposals.

3 There will simply be insufficient time for
 4 core participants to make the points they wish to make
 5 in a time-limited opening oral statement.

6 My Lady, the Cymru group consider that not having
 7 written opening statements is a very significant missed
 8 opportunity on the Inquiry's part which does,
 9 unfortunately, further limit the ability of
 10 core participants -- and particularly non-state
 11 core participants -- from effectively participating.

12 So, my Lady, we do urge you reconsider the issue of
 13 receiving written opening statements.

14 Finally, I just want to end by saying that the Cymru
 15 group want to reinforce to you today, my Lady, that they
 16 remain committed to working with this Inquiry and your
 17 Inquiry legal team in an open and collaborative way.

18 Thank you very much.

19 **LADY HALLETT:** Thank you very much, Ms Heaven.

20 As you have obviously acknowledged, I welcome and
 21 encourage contributions from core participants. To date
 22 they have been extremely helpful and constructive, and
 23 very properly raised areas of concern.

24 I do understand your particular concerns about,
 25 obviously, disclosure and the timetable and matters

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1 a collaborative fashion, which will make the Inquiry
 2 work more effectively, particularly for the Welsh
 3 bereaved. It will also allow the Inquiry to draw on the
 4 wide range of knowledge and experience of the bereaved.

5 However, on a practical level, if disclosure is to
 6 continue up to and possibly even during the hearing,
 7 it's inevitable that this will impact on the Rule 10
 8 process, and it may well increase the number of
 9 applications from the bereaved to question witnesses
 10 directly.

11 My Lady, given the limited disclosure in relation to
 12 Wales, I've nothing further to say at this stage on the
 13 approach to witnesses.

14 The only further procedural matter that I wish to
 15 comment on is the Inquiry's decision, as communicated in
 16 the March update, that written opening statements are
 17 not to be invited and will not be considered for
 18 Module 1.

19 Now, a written opening statement, as you know, is in
 20 effect a final opportunity -- or near final
 21 opportunity -- for core participants to provide their
 22 submissions on the evidence. The Cymru group are in no
 23 doubt that all non-state core participants will be able
 24 to offer you and CTI significant assistance in written
 25 opening statements. This is particularly so given that

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1 relating specifically to Wales and the Welsh Government.

2 I remember vividly from my visit to Wales during the
 3 terms of reference consultation that there were issues
 4 that were very specific to Wales, as indeed there will
 5 be issues specific to Scotland and Northern Ireland.

6 So I do understand what you're saying, and I will
 7 address the concerns with the Inquiry team, and I hope
 8 that we'll be able to allay any concerns in good time.

9 So thank you very much for your submissions, and
 10 I will consider them very carefully.

11 **MS HEAVEN:** Thank you.

12 **LADY HALLETT:** Thank you.

13 Now I think we have Ms Murphy King's Counsel.

14 **Submissions on behalf of the Trades Union Congress by**
 15 **MS MURPHY**

16 **MS MURPHY:** Good afternoon, my Lady.

17 If I may begin, please, with extending an apology on
 18 behalf of Ms Gallagher King's Counsel and Mr Jacobs, who
 19 have prior professional commitments today. No
 20 discourtesy is intended, and I offer the important
 21 reassurance that my understudy arrangement is
 22 a temporary one.

23 **LADY HALLETT:** I think I would like to reiterate my
 24 congratulations to you, Ms Murphy, on your recent
 25 appointment to the rank of King's Counsel.

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1 **MS MURPHY:** That's very kind, my Lady, thank you.

2 My Lady, as you're aware, I appear instructed by
3 Thompsons Solicitors on behalf of the Trade Union
4 Council, and it is meaningful to do so in a week when
5 our clients and the trade union movement globally
6 remember all workers who have lost their lives to
7 workplace illness or injury, and who re-commit on
8 28 April every year to take action to reduce workplace
9 injury and fatality.

10 The TUC's commitment to assisting your Inquiry to
11 the fullest extent of its resources falls squarely
12 within this annual commitment to action, as they
13 recognise that without lessons being identified they
14 cannot be learned and the necessary change will not
15 come.

16 My Lady, I have some very brief submissions, as most
17 of the matters that concern us have been carefully
18 addressed by others. We make first a few short
19 observations and secondly, but again briefly,
20 a submission of substance relating to the social care
21 sector.

22 So, my Lady, the initial observations.

23 The Trade Union Council is cognisant and
24 appreciative of the industry that your team has brought
25 to bear to ensure that this is an Inquiry that will

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1 repetition or continuance of non-co-operation by central
2 government, and we are equally reassured by your
3 reference this afternoon to use your significant powers
4 to ensure that co-operation, if that proves necessary.

5 My Lady, before I move off that topic, we note and
6 request further clarification of the nine individuals
7 who have not replied to Rule 9 requests and the six who
8 have declined to provide responses.

9 If I might deal briefly with Mr Keith KC's point 13,
10 which arises from paragraphs 26 to 32 of the written
11 submissions on behalf of the TUC, the list of bodies and
12 the scope of Rule 9 requests to them.

13 My Lady, we do consider it sensible to comment once
14 we've had the opportunity to consider the responses from
15 the Local Government Association, so we say nothing
16 further about that this afternoon.

17 So far as Dr Kirchelle is concerned, we're grateful
18 for the practical suggestion made by Mr Keith
19 King's Counsel, and we will follow up on the
20 constructive offer made.

21 If I might then turn to the submission of substance,
22 which relates to the list of issues or scope of
23 Module 1, and specifically the nature of the planned
24 scope pertaining to the social care sector within
25 issue 4.

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1 proceed at rapid pace. The TUC continues to support
2 the Inquiry's maintenance of a challenging timetable,
3 while acknowledging and supporting the submissions made
4 to you this afternoon with regard to the challenges that
5 this in turn places upon the non-state
6 core participants.

7 It is in that context that the TUC, in common with
8 others from whom you have heard today, have been deeply
9 concerned to hear that central government departments
10 have failed to provide statements within the scope of
11 the requests made of them, have offered insufficient
12 detail, have caused your team to devote resources to
13 making follow-up requests to address matters that they
14 have omitted, and to expand on matters that had been
15 included with insufficient detail.

16 We welcome Mr Keith King's Counsel's confidence that
17 the issues have been addressed, but, my Lady, your
18 Inquiry is of course entitled to the fullest possible
19 co-operation and assistance from central government, and
20 in particular such co-operation is of course essential
21 if this process is to meet the laudable objectives that
22 you have set for it, including specifically the
23 effective participation of the bereaved and those we
24 represent.

25 We are confident you, my Lady, will not tolerate the

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1 We are of course grateful for Mr Keith KC's
2 clarification that the prescient concerns raised in the
3 context of Operation Cygnus in 2015 as to the capacity
4 within the social care sector to permit the NHS to
5 implement its proposed reverse triage plans will fall
6 within the scope, and that addresses one aspect of the
7 TUC's submissions on this topic, at paragraphs 18 to 22
8 of our written submissions.

9 But more broadly, the TUC consider the interface
10 between public health services and social care, and the
11 structural problems within social care that made that
12 interface so problematic during the pandemic, to be
13 topics of critical, central importance to your
14 consideration of pandemic preparedness and planning at
15 a high level.

16 The concerns are not limited to sectoral or
17 operational matters that can be raised with witnesses in
18 later modules.

19 We have emphasised at paragraphs 20 to 22 structural
20 problems that were or ought to have been identified in
21 the pre-pandemic period, in the context specifically of
22 pandemic risk management and preparedness.

23 By way of a very specific example, at paragraph 21
24 of our submissions, we have discussed the lack of
25 structural preparedness in relation to data collection.

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1 As you will appreciate, my Lady, the national audit unit
2 picked up in June 2020 that the non-availability of
3 a mechanism for the collation of daily data from the
4 social care sector caused real difficulty at the start
5 of the outbreak.

6 The Inquiry has also received important evidence on
7 this topic in the form of a statement dated
8 14 December 2022 -- and the reference is INQ80743 --
9 which we invite you to consider with care in relation to
10 this aspect. That statement addresses multiple
11 occasions when the escalating fragility of the
12 social care sector was brought to the attention of the
13 government, long before 2019, and specifically in the
14 context of pandemic planning.

15 Structural issues going directly to the question, to
16 use Mr Keith KC's term of this morning, whether we were
17 properly ready. This is of course a topic that directly
18 affected an enormous proportion of those adversely
19 affected by the pandemic.

20 The statement to which we have made reference
21 informs that adult social services support over
22 1.1 million people receiving state funded social care,
23 and those adult social services have, in addition,
24 safety netting responsibility in relation to
25 organisations delivering care outside the state sector.

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1 replicate that imbalance, and must put considerations of
2 social care, planning and resilience at the front and at
3 the centre of Module 1.

4 We invite you to do so, my Lady, at this stage by
5 reference to -- by making amendments to the scope
6 identified for Module 1, because there are of course
7 implications for the witness lists and for the
8 instruction of experts.

9 We do invite your careful consideration of this
10 aspect and we're grateful, my Lady, for your ongoing
11 careful attention to the issues that we raise.

12 Unless there is anything further we can assist you
13 with, those are our submissions.

14 **LADY HALLETT:** Thank you very much indeed, Ms Murphy.

15 As you say, there are a number of matters there that
16 you have raised and others have raised during the course
17 of today, and I will consider them very carefully with
18 the Inquiry team. Thank you very much for your help.

19 Mr Keith, any further comments from you?

20 **MR KEITH:** My Lady, I think only to offer that if of course
21 there are any matters on which you would particularly
22 like to hear me respond on, then I am available to
23 address them. But obviously there are a number of
24 matters here to which you will, we all know, be giving
25 the closest consideration. Whether or not they require

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1 There are some 17,700 such organisations and, in
2 addition, as at the 2011 census, 6.5 million people in
3 the UK were carers.

4 All will be concerned by the issue of whether there
5 was a structural lack of preparedness in relation to the
6 social care sector.

7 This same statement informs that 1.54 million people
8 worked in adult social care, a higher number than within
9 the NHS, and the NHS has itself spoken clearly of the
10 impact of the pressures in social care on delivery of
11 health services. The relationship is an essential one,
12 it is one of interdependence.

13 The point has been repeatedly made that both
14 pandemic planning and the early response to this
15 pandemic epitomise the under-recognition of social care
16 on(?) the people needing it and the people working
17 within it, and that social care was not well understood,
18 nor the impact of swingeing austerity cuts affecting the
19 sector.

20 Lord Kamall, Parliamentary Undersecretary at the
21 Department of Health and Social Care, said in the Lords
22 on 8 September 2022 that the government recognises that
23 for a long time the social care sector has been treated
24 like Cinderella, a poor relation to the health system;
25 and the TUC press the point that your Inquiry should not

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1 specific rulings is another matter, but I know that
2 these will all be debated within the Inquiry team and be
3 the subject of resolution by yourself in the usual way.

4 **LADY HALLETT:** Thank you, Mr Keith.

5 I think the best thing is if I consider the
6 submissions very carefully, obviously, and then consult
7 with the Inquiry team and see the extent to which we can
8 allay the concerns which have been raised today. As
9 I have indicated, I will bear all the submissions made
10 in mind, and see whether or not any rulings are
11 necessary. I suspect, as you do, that rulings aren't
12 necessary, but obviously close co-operation with the
13 core participants will be.

14 So, thank you, everybody, for attending today's
15 hearing.

16 I believe this may be the last hearing which we
17 conduct remotely, although there may be one more
18 preliminary hearing, but it's certainly I hope the last
19 hearing we will be conducting remotely as far as
20 Module 1 is concerned. So on the next occasion we meet,
21 I hope it will be in the hearing centre.

22 Thank you all very much indeed.

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

24 **(2.50 pm)**

(The hearing adjourned)

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