

Tuesday, 6 June 2023

(10.30 am)

Introductory remarks by THE CHAIR

LADY HALLETT: Good morning, everyone.

This is the third preliminary hearing for Module 2 of the Covid-19 UK Inquiry, focusing on core decision-making. It is taking place in Dorland House, Paddington. Dorland House will be the venue for the London-based hearings at which evidence is heard and which we will start next week with Module 1, that will be focusing on resilience and preparedness. Other hearings will take place in the devolved nations.

The Inquiry team has spent a great deal of time and resources finding and equipping a suitable venue in London and is currently exploring options for Northern Ireland, Scotland and Wales. I hope that Dorland House will be adequate for the vast majority of those attending hearings in London. It isn't perfect but we couldn't find a venue that was perfect, available for the time that we shall need it, and that would not cost the taxpayer an exorbitant sum of money.

We have done everything we reasonably can to make the hearing centre as accessible as possible and to allow a reasonable number of people to attend in person.

For those who are unable to attend in person but

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Inquiries Act 2005 making it clear that, in my view, it is for the Inquiry Chair to decide what is relevant or potentially relevant.

The Cabinet Office disagrees, claiming they are not obliged to disclose what they consider to be unambiguously irrelevant material. They invited me to withdraw the section 21 notice. I declined, and they are now challenging my decision to withdraw the notice -- or to decline to withdraw the notice in the High Court by way of judicial review.

With litigation pending and as the decision-maker I can make no further comment.

Mr Hugo Keith King's Counsel, Counsel to the Inquiry, will now outline the steps that have been taken so far, and the issues that arise for my consideration today. I shall also hear from those of the core participants who wish to make oral submissions. I am, as ever, very grateful to all those who have made written submissions. I have read them carefully, and I will bear them very much in mind.

Given the amount of work we must get through today, I invite the core participants who do make oral submissions to focus on the most important aspects of their submissions and not to dwell on matters that can be dealt with in writing and do not need to be rehearsed

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wish to follow our proceedings, you'll be able to do so online. More work will be done on Dorland House this summer and if there are any further reasonable adjustments that need to be made, we should be happy to consider them.

In preparing for the evidence, for the hearing of evidence in Module 2 due to take place this autumn, the Inquiry team has been working extraordinarily hard gathering all relevant and potentially relevant material.

As has been widely reported in the media, an issue has arisen between the Inquiry and the Cabinet Office as to who decides what is relevant or potentially relevant.

MR KEITH: My Lady, I'm extremely sorry to rise to my feet.

There may be a technical problem with the transmission of your opening remarks.

HEARINGS MANAGER: No, we're fine.

MR KEITH: Ah, no, it's been resolved. There we are, I'm very sorry for interrupting you.

LADY HALLETT: Not at all, thank you.

I'll begin again.

As has been widely reported in the media, an issue has arisen between the Inquiry and the Cabinet Office as to who decides what is relevant or potentially relevant.

I issued a notice under section 21 of the

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orally.

So with those words, I now ask Mr Keith to tell me what is happening today.

Statement by LEAD COUNSEL TO THE INQUIRY

MR KEITH: My Lady, thank you very much.

I don't propose to reintroduce the core participants or their legal representatives in the interests of time, but there remain 39 core participants in Module 2 and all bar three are legally represented. We've received 14 sets of written submissions for today's hearing, and I believe that you'll be hearing from 13 separate legal representatives.

We are of course very grateful to all the core participants who provided written submissions for having given us their observations and their insights.

My Lady, may I start with the issue of panelists.

On 27 April 2023, the Prime Minister announced in a written statement to Parliament that he had decided that the Inquiry would be more efficiently and swiftly conducted if you were not to sit with a panel. The Prime Minister referred to a number of matters that he had taken into consideration. He observed that it was in the public interest that the Inquiry be thorough, rigorous and comprehensive, but also that it delivers its report without excessive delay. My Lady, I know

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1 that you'll recall that he referred to the fact that you
2 have a number of mechanisms at your disposal to enable
3 your Inquiry to gather the breadth of evidence and
4 experiences needed to deliver its work, both effectively
5 and efficiently, and also to enable you to make findings
6 and recommendations as quickly as you reasonably can.

7 Those mechanisms include your ability to appoint
8 scientific, economic and other experts to prepare
9 reports, those reports would obviously be published,
10 they allow you to call those experts to give evidence
11 publicly and to guide you in your endeavour. They also
12 include the gathering of views from the public through
13 Every Story Matters.

14 That decision, my Lady, was one entirely for the
15 Prime Minister to decide, because he is the sponsoring
16 minister for this Inquiry. It was not one for you, and
17 so the advancing by myself of submissions on this issue
18 would not appear to serve much purpose.

19 The Prime Minister did, however, consult you. He
20 did so because he was obliged to do so under
21 section 4(3) -- section 4, subsection 3 -- of the
22 Inquiries Act 2005. However, it would not be right, and
23 nor is it necessary, for the Inquiry to disclose the
24 contents of that consultation, and so I will say no more
25 about that issue.

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1 don't believe that the list of issues for this module
2 can be published before middle or late July.

3 Given the very large number of points which have
4 been raised in the submissions from the
5 core participants, I don't propose to address all of
6 them, but may I confine myself to just four or five of
7 them, which appear to us to be of the greatest
8 importance.

9 We acknowledge a specific request concerning the
10 specificity to be given to the consideration of
11 vulnerable and at-risk groups in the process of core
12 political and administrative decision-making, including
13 the consideration of the needs of deaf and disabled
14 people, those with pre-existing health inequalities and
15 those otherwise vulnerable to Covid-19 and long Covid.
16 We are giving careful thought to how those matters can
17 be expressed, perhaps better expressed, in the written
18 list of issues. But I want to assure all the
19 core participants that those matters are very much at
20 the forefront of our minds and are already under
21 consideration.

22 Secondly, a number of the core participants have
23 raised the issue of so-called austerity policies and the
24 way in which the Inquiry intends to address those
25 policies and their impact on the core political and

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1 I then turn to the issue of the list of issues for
2 consideration in this module, Module 2. In August 2022,
3 the Inquiry published its provisional scope for
4 Module 2. Since that date, your legal team has been
5 conducting an investigation within the remit of that
6 published document. You directed at the last
7 preliminary hearing that the Inquiry circulate to
8 core participants a more detailed list of issues. That
9 list was issued on 27 April, and we received back the
10 core participants' comments on it on 11 May. We're very
11 grateful to them for their insightful and constructive
12 comments.

13 My Lady, there were a very great number of comments,
14 however, and so we are still working through them all,
15 but all the points are being considered and I want to
16 give that assurance.

17 An additional important factor in this module is the
18 need to ensure, in addition, an appropriate degree of
19 consistency with the issues being ventilated in
20 Modules 2A, 2B and 2C, and that also includes being
21 sighted on the observations that the core participants
22 may wish to make in those modules. Observations are due
23 from the core participants to Module 2C by 13 June, and
24 so allowing for time to consider both those observations
25 and also to debate them between the module teams, we

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1 governmental decision-making that is the heart of
2 Module 2.

3 Our provisional view, my Lady, is that such matters
4 go more naturally to the question of resilience and
5 preparedness, which, as you've said, is a matter being
6 addressed in Module 1, but we intend to reflect further
7 on that and we will report back to the core participants
8 in due course.

9 Thirdly, in relation to Northern Ireland, we've
10 asked in a number of Rule 9 requests in Module 2 about
11 the role that the Secretary of State for
12 Northern Ireland and the British-Irish Council has
13 played in facilitating intergovernmental relations
14 during the pandemic and also about the co-ordination of
15 the governmental response to Covid across the four
16 nations.

17 Module 2C will be exploring those matters in the
18 context of the response to Covid in Northern Ireland,
19 of course, and as well it will be looking at issues
20 relating to the north/south relationship. So matters
21 which directly impact upon Northern Ireland are better
22 considered in the rubric of Module 2C.

23 Fourthly, a point has been made by a number of
24 core participants that we have afforded
25 a disproportionate amount of attention to

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1 the United Kingdom Government and its affairs in
2 Module 2 and that there is a bias towards focusing on
3 Westminster.

4 My Lady, Module 2 will be concerned with the
5 United Kingdom Westminster matters, including of course
6 the Westminster end of communications with the devolved
7 administrations. So there is bound to be
8 a concentration of attention on the United Kingdom by
9 contrast to Module 2A, 2B and 2C, which are the
10 analogous modules for Scotland, Wales and
11 Northern Ireland.

12 Nevertheless, we have issued Rule 9 requests to all
13 the first ministers and Northern Ireland's former Deputy
14 First Minister, asking them to address their engagement
15 with Whitehall in their responses and to provide all key
16 supporting materials. We expect those statements to be
17 thorough and to provide you with all the relevant
18 supporting materials that you would need.

19 Lastly, by way of this introductory review, one
20 core participant has advanced submissions concerning the
21 extent to which Module 2 will cover the closure of
22 schools. Of course there will be exploration through
23 the high level political decision-makers of the broad
24 reasons why school-related decisions were taken as they
25 were, but the detailed examination of the merits of that

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1 yesterday, almost 350 formal requests for evidence under
2 Rule 9 have been sent out relating to entities, persons
3 and organisations in Module 2 alone. Almost 100 more
4 have been sent out to entities and persons where the
5 issues raised in those Rule 9s spanned not just
6 Module 2, but Modules 2A, 2B and 2C also.

7 To give a sense of the breadth and width of your
8 Inquiry's reach, the Rule 9 requests include 38 requests
9 to government departments, government bodies,
10 arm's length bodies and a variety of associations, 11 to
11 regional mayors, 12 to ministers, including the
12 Prime Minister Rishi Sunak, former Prime Minister
13 Boris Johnson MP, Dominic Raab MP, Penny Mordaunt MP,
14 Matt Hancock MP, Liz Truss MP, Kemi Badenoch MP and
15 Michael Gove MP.

16 We have issued requests for witness statements from
17 the former First Minister of Scotland, Nicola Sturgeon,
18 the former First Ministers of Northern Ireland,
19 Baroness Foster and Paul Givan, former Deputy First
20 Minister of Northern Ireland, Michelle O'Neill, and the
21 First Minister of Wales, Mark Drakeford.

22 Rule 9 requests have gone to chief medical officers,
23 their deputies and their predecessors, and we've
24 requested witness statements from persons who held
25 positions in the Cabinet Office and Number 10.

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1 process and of the operational impact of decisions to
2 shut schools can only take place in the later education
3 module.

4 Finally, in relation to long Covid, a group of
5 core participants have asked us to address the extent to
6 which long Covid was considered by decision-makers at
7 the time. That will be considered in the course of
8 Module 2, because of course it goes to the merits of
9 that decision-making. But the detailed consideration of
10 long Covid and its medical aspects is reserved to
11 Module 3, the healthcare module.

12 My Lady, may I then turn to the issue of the Rule 9
13 requests which have been issued by the Inquiry.
14 An enormous amount has been done since we last met.
15 The Inquiry has worked extremely hard to ensure that it
16 and the core participants can be ready for the public
17 hearing scheduled under this most demanding of
18 timetables. Tens of thousands of documents and exhibits
19 have been received from document providers so far,
20 although not all of them, of course, are relevant and
21 disclosable.

22 My Lady, may I commend the legal team in Module 2
23 for their diligence and hard work in scoping, drafting
24 and issuing so many Rule 9s and in dealing with the
25 array of documentation that has been received. As of

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1 They include, my Lady, former and current Cabinet
2 secretaries, senior civil servants, chiefs of staff,
3 private secretaries, advisers and other civil servants.

4 In September of 2022, Module 2 also issued
5 200 Rule 9 questionnaires to participants of SAGE and
6 its sub-groups and 17 Rule 9 questionnaires to members
7 of Independent SAGE. We have issued 19 more detailed
8 Rule 9 letters to a number of those individuals as well
9 as to a number of other scientists.

10 We have also sent a very significant number of
11 impact questionnaires to bodies and organisations
12 representing individuals who might be considered to have
13 been at greater risk or vulnerable. My Lady, that
14 includes groups representing the bereaved, women,
15 children and young people, ethnic groups, those
16 suffering from health inequalities, including long Covid
17 and mental health issues, older people, those with
18 disabilities, members of the LGBTQ+ community, workers'
19 groups and health professionals.

20 The issue of inequalities, since this has been
21 raised by the core participants, has been included in
22 practically every Rule 9 request issued by Module 2,
23 including to persons involved in the decision-making and
24 their advisers. We've also sent Rule 9 requests to the
25 Cabinet Office, Equality Hub, Liz Truss, former Minister

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1 for Women and Equalities, Kemi Badenoch MP, as I've
2 said, Justin Tomlinson MP, the former Minister for
3 Disabled People, and a number of other organisations
4 concerned with equalities and human rights.

5 We have also sent a number of requests with a focus
6 on long Covid, the government's understanding of that
7 condition and the impact that that might have had on
8 their decision-making.

9 My Lady, the number of Rule 9 requests and the wide
10 range of organisations, entities and people who have
11 received such requests, although highlighting the scale
12 of your task, provides ample reassurance that we have
13 cast our investigative net sufficiently widely.

14 In addition, we have accepted additional suggestions
15 from core participants as to who should receive a Rule 9
16 request and we have acted upon those suggestions.

17 We are very grateful to all those who have engaged
18 with the requests and who have provided statements.

19 A significant proportion of those requests, as I've
20 said, have been made to government departments. In the
21 case of the majority of those departments, my Lady, it's
22 right to say that the government departments concerned
23 have responded under demanding timescales, and having
24 contributed a considerable amount of work.

25 Those government departments and their legal teams
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1 change as a result of any further scrutiny of the
2 evidence by the Inquiry legal team and any matters
3 raised by the core participants following the disclosure
4 to them in the first instance of the documents.

5 Given the relatively short period of time before the
6 start of the substantive hearings, delays in that
7 difficult and burdensome process had the potential to
8 disrupt the Inquiry's process unless such problems are
9 swiftly resolved, and it's therefore appropriate that
10 I tell the core participants something more about the
11 problems that we've encountered.

12 First, a considerable number of the draft statements
13 submitted have either contained insufficient detail or
14 did not address all the matters raised in the Inquiry's
15 Rule 9 request, so the Inquiry -- as with Module 1 --
16 has asked many of the witnesses by way of response to
17 expand upon the matters raised in their draft
18 statements. The work required to consider those draft
19 statements and to send requests back for further detail
20 has an obvious impact upon the workload of the Inquiry
21 and upon the process of disclosure.

22 We do consider, however, that overall the timetable
23 will not be significantly impacted, and we are confident
24 that the vast majority of the final signed statements
25 and exhibits will be disclosed to core participants
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1 have worked very hard to respond to the requests, and
2 we're very grateful to them for that co-operation.

3 But I must raise with you today some aspects of the
4 disclosure exercise that has been conducted by a limited
5 number of government departments.

6 The principal position, and it's the position that
7 we have applied in relation to every government
8 department recipient, is that each and every document
9 which is called for in response to a Rule 9 request must
10 be provided to your team in clean, unredacted form. The
11 document or part thereof is then reviewed by the Inquiry
12 and irrelevant information, including to a very large
13 extent personal data, is redacted by the Inquiry team.

14 The process does allow for the provider of the
15 documents to review those redactions and make a claim
16 for further redactions to be applied. The Inquiry legal
17 team then considers all the additional requests and
18 either makes the additional redactions or rejects them
19 with reasons. All this is done in accordance with the
20 published redaction protocol made available by
21 the Inquiry, and that protocol has been on the website
22 since October last year.

23 I must make plain that each redaction which
24 the Inquiry, as opposed to the material provider, makes
25 is provisional and therefore it is subject also to
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1 before the end of July 2023, this July.

2 Second, in respect of a number of entities, there
3 has been a failure to respond in good time to the Rule 9
4 requests, necessitating repeated extensions to
5 deadlines. We are on top of the issue, but witness
6 statements from a number of key government witnesses are
7 due to be provided to the Inquiry in the coming days and
8 weeks on the expiry of many of those deadlines. So
9 I wish to emphasise the absolute need on the part of
10 those government departments to comply with these final
11 deadlines given the diminishing time before the
12 substantive hearing.

13 Further requests for extensions are unlikely to be
14 granted.

15 I would then like to draw your attention to five
16 specific matters concerning disclosure, in the majority
17 matters which the Cabinet Office, which is represented
18 today, is invited to respond to you upon.

19 The first issue concerns the WhatsApp process.
20 The Inquiry has made requests for potentially relevant
21 communications sent via WhatsApp from almost
22 30 Cabinet Office witnesses. The vast majority of those
23 requests were made in December 2022 and January 2023.
24 Whilst it's understood that a number of those witnesses
25 do not currently hold such materials, and of course
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1 we're seeking explanation from them as to why that is
2 so, there is a lack of certainty about what potentially
3 relevant content is in fact held by the Cabinet Office
4 and which will therefore be provided to the Inquiry in
5 due course.

6 We have received WhatsApp material from Mr Johnson
7 and from two other individuals, and all that material
8 has had redactions applied to some of the content. But
9 we do not know how many more individuals are in
10 a position to give us WhatsApp material relating to
11 their communications, which material may be in the
12 possession of the Cabinet Office.

13 In addition, we have very recently identified that
14 the Cabinet Office is not alone in this position. The
15 Foreign, Commonwealth & Development Office has supplied
16 to the Inquiry potentially relevant WhatsApps from two
17 of their special advisers, many with extensive
18 redactions made to that material on the basis of
19 relevance. This was identified too late to invite the
20 Foreign Office, who are core participants, to attend
21 today to explain their position to you, but of course on
22 the basis that they're following your proceedings,
23 my Lady, may we make clear that we expect them to
24 provide unredacted WhatsApp material without delay. If
25 of course the judicial review claim, to which I'll come

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1 evidence, and we requested that the Cabinet Office
2 identify potentially relevant Spaces. We made it clear
3 that we wished to assist the Cabinet Office in this task
4 by helping them to prioritise it within the disclosure.

5 A significant number of calls for formal updates have
6 been made, and deadlines have passed unanswered.

7 Last week, the Cabinet Office provided a schedule of
8 potentially relevant Google Spaces along with a list of
9 membership of each group, the time period during which
10 the groups were active, and an indication of volume.

11 Whilst it's regrettable that so much time has
12 elapsed before reaching this point, we are nevertheless
13 grateful for that schedule, but we've identified
14 a number of groups which need to be prioritised for
15 extraction and disclosure.

16 My Lady, in relation to the material on
17 Google Spaces, the same issue of course arises as it
18 arises in relation to the WhatsApps, the diaries and the
19 notebooks relating to Mr Johnson. For obvious reasons,
20 we maintain that that material, the Google Spaces
21 material, must be provided to the Inquiry without
22 redactions, without a relevancy review being undertaken
23 by the Cabinet Office.

24 Our position, as you know, and it is your position,
25 that any relevancy review and redaction is wrong in

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1 in a moment, is dismissed.

2 It may be worth pointing out that the
3 Department of Health and Social Care, by contrast, has
4 to date provided much fuller disclosure, including
5 Mr Hancock's WhatsApp messages without any redactions at
6 all for relevance being applied to that material, and so
7 we would of course invite the Foreign Office and the
8 Cabinet Office to pay close regard to the position
9 adopted by the DHSC.

10 The Cabinet Office is required to remedy immediately
11 all overdue disclosure of potentially relevant WhatsApp
12 materials both relating to group messages and one-to-one
13 threads with other key individuals.

14 The Cabinet Office has also been asked for but is
15 yet to provide an updated schedule of all the
16 potentially relevant WhatsApp materials held by all of
17 its witnesses. So, my Lady, no doubt you'll be hearing
18 from Mr Chapman on behalf of the Cabinet Office in due
19 course on that issue.

20 The second issue concerning the Cabinet Office
21 relates to Google Spaces. The Cabinet Office drew to
22 the attention of the Inquiry in January the existence of
23 Google Spaces as a forum for key individuals to have
24 communicated during the response to the pandemic. We
25 agreed that this was potentially a relevant source of

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1 principle, as well as slowing down the process of
2 provision of material to the core participants. But
3 of course the resolution of that issue must await the
4 outcome of the High Court's decision in the judicial
5 review relating to Mr Johnson's material.

6 The third matter concerns communications and
7 material relating to agendas, briefings and minutes of
8 calls between the First Ministers of Scotland and Wales
9 and the first and deputy First Ministers of
10 Northern Ireland and the United Kingdom Government.

11 It's been made clear, we have made it clear to the
12 core participants and to material providers, that
13 communications with the devolved administrations is
14 a vital part of Module 2 and that the records of key
15 communications between government ministers and the
16 devolved administrations must be provided. We have made
17 repeated requests for an update on the delivery of such
18 material, and on 25 May, just 12 days or so ago, the
19 Cabinet Office wrote to the Inquiry to explain that, as
20 a result of machinery of government change, these
21 materials were now legally under the responsibility of
22 the Department for Levelling Up, Housing and
23 Communities, DLUHC, and we were asked to liaise further
24 with DLUHC.

25 Naturally we have pointed out that that is

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1 an unacceptable position and we have asked the
2 Cabinet Office in the strongest terms to address this
3 issue.

4 Mr Chapman has addressed this issue in his written
5 submissions for today, though those are, of course, in
6 the bundle before you, and I'm sure you will be inviting
7 him to further elaborate upon them.

8 They did indicate, I'm pleased to say, eventually,
9 that the materials would be provided, and I'm pleased to
10 confirm that they were today. But they now require to
11 be reviewed, they need to be looked at without delay,
12 and we obviously need to progress them for disclosure to
13 the core participants.

14 I raise it for completeness because it's a matter
15 that the core participants have raised, or rather it's
16 a matter which needs to be raised with the
17 core participants, because they've shown concern about
18 the nature of the Cabinet Office's approach to this
19 material.

20 The fourth issue concerns the matter of Cabinet
21 collective responsibility. My Lady, the Cabinet Office
22 indicated in correspondence that it would seek to
23 withhold from core participants, although not from
24 the Inquiry, a certain amount of material, disclosure of
25 which was said in its view to be likely to damage the

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1 government will not take a position on Cabinet
2 collective responsibility in relation to any material.
3 If it does wish to do so, we would want them to make
4 a formal application for restriction order by perhaps
5 20 June, in order that this issue doesn't rumble on.

6 My Lady, given the indication today that such
7 material may be received without a claim to Cabinet
8 collective responsibility being made, I don't think
9 I need to address you in relation to the process that
10 might be applied were a restriction order application to
11 be made. Some of the core participants have advanced
12 a number of submissions to the effect that they would
13 wish to be heard in principle on the open issues
14 reflective of the restriction order applications, and
15 of course you would be, I'm sure, prepared to hear them.
16 But may we defer to another day what procedure we put in
17 place for the receipt of those submissions?

18 Fifthly, in relation to the Cabinet Office again,
19 there is the well-publicised issue of Mr Johnson's
20 official diaries, his notebooks and potentially relevant
21 WhatsApp messages, both from him and from one of his
22 advisers.

23 My Lady, all that material dates from the period of
24 government decision-making that is the subject of
25 scrutiny by the Inquiry, and as you said on 28 April,

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1 public interest, national security. They argued that
2 this material which is in their possession would, if it
3 was disclosed, breach the principle of Cabinet
4 collective responsibility.

5 The Cabinet Office provided a selection of
6 materials, around 13 documents in all, consisting of
7 Cabinet and Cabinet Committee minutes. They said that
8 they were potentially representative of a larger number
9 of documents in relation to which the government would
10 wish to prevent onward disclosure and apply for
11 an appropriate application under section 19 of the
12 Inquiries Act for what is known as a restriction order.

13 My Lady, this morning we've been informed that the
14 government may no longer wish to rely upon the principle
15 of Cabinet collective responsibility for the purposes of
16 seeking restriction orders and therefore withholding the
17 disclosure of that material from the core participants.

18 You may wish to invite Mr Chapman to confirm the
19 position today, and to provide you with more detail as
20 to what the Cabinet Office's principled basis for its
21 position is.

22 It's obvious that whilst the issue of these
23 13 documents may now be resolved, there is the potential
24 for the principle to be applied at a later date to other
25 material and we would welcome confirmation that the

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1 a notice under section 21 of the Inquiries Act was sent
2 to the Cabinet Office requiring those documents to be
3 produced, because you considered them to be potentially
4 relevant, and because they had been provided or
5 understood would be provided only in redacted form so
6 far, and so that there is no doubt, you've required them
7 to be received in unredacted form so that you could
8 determine the relevancy of their contents.

9 My Lady, the position maintained by the
10 Cabinet Office is not likely, of course, to be limited
11 to those particular materials. Almost inevitably, this
12 issue will have application to the very wide range of
13 documents, emails, WhatsApps and text messages that the
14 Cabinet Office and other government departments will and
15 may hold on behalf of persons who engaged in such
16 communication. I have already addressed you in relation
17 to the impact upon Google Spaces material.

18 So there is a principle of very considerable
19 importance to be resolved.

20 My Lady, as you mentioned on Thursday last week, the
21 Cabinet Office served its application for judicial
22 review challenging your ruling of 22 May, which was
23 a ruling, of course, that had the result that the
24 section 21 notice still stood. Time is pressing. We
25 have therefore requested, and the High Court has now

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1 ordered, that the application for judicial review be
2 heard by way of a rolled-up hearing, and that's
3 a process, as you know, in which the court considers the
4 application for permission and then, if it grants
5 permission, it goes on to consider the full application.

6 That application, the rolled-up application, is
7 likely to be heard on 30 June or very shortly
8 thereafter.

9 Given that the issue is now on its way to the
10 High Court, it's probably not particularly profitable
11 for me to say more about the judicial review itself.
12 However, on 1 and 2 June the Cabinet Office supplied
13 the Inquiry with copies of Mr Johnson's potentially
14 relevant WhatsApps and of his diary. Both sets of
15 material were still redacted. They've also supplied us,
16 again redacted, with copies of the notebooks, and copies
17 of his 25 notebooks are said to have been transferred to
18 us yesterday, although I don't believe that they've
19 reached the Relativity system.

20 Nevertheless, as has been well publicised,
21 Mr Johnson has offered to provide the Inquiry with
22 assistance directly. We're grateful to him for his
23 co-operation, and the Inquiry team has been liaising
24 with his legal team to arrange for the inspection of the
25 unredacted WhatsApps that he had provided to the

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1 personnel in government for its contents to be
2 downloaded. We have asked the Cabinet Office, in
3 liaison with Mr Johnson and those government personnel,
4 to obtain the phone without delay, to confirm in writing
5 the process by which it will be examined, and to give
6 confirmation that it, like the dairies and the notebooks
7 and the WhatsApps, will be accessed fully. That is to
8 say, that there will be no redactions made to the
9 contents, other than in relation to national security,
10 before we may view it.

11 My Lady, may I make one further observation on this
12 topic. Some may have seen a report in the press to the
13 effect that the Cabinet Office had written to Mr Johnson
14 at the end of last week to say that payment of his legal
15 costs was conditional, amongst a number of conditions,
16 on him not giving the Inquiry any documents without its
17 "pre-approval and redaction".

18 The Inquiry Secretary, Mr Connah, wrote to the
19 Cabinet Office on Sunday to seek confirmation of what we
20 suspected to be the case, which is that the
21 Cabinet Office was only seeking to ensure that national
22 security protected material was not going to be
23 disclosed by Mr Johnson. It is our understanding that
24 the Cabinet Office was not seeking to prevent Mr Johnson
25 from disclosing material which it, the Cabinet Office,

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1 Cabinet Office but which he has had returned to him. We
2 expect to begin that inspection this week.

3 The inspection, my Lady, will allow your team to
4 make its own assessment of the redactions applied by the
5 Cabinet Office and to satisfy ourselves and ultimately
6 you of their appropriateness or otherwise.

7 The Cabinet Office also holds the notebooks. We
8 have proposed that they be returned to Mr Johnson by
9 12 June, after which we will make arrangements to
10 inspect the unredacted copies of those notebooks for
11 ourselves, and compare them to the redacted copies
12 already provided by the Cabinet Office.

13 We are awaiting confirmation from the Cabinet Office
14 about the possession and control of Mr Johnson's
15 diaries, and again we will seek to inspect a clean copy
16 with the assistance of Mr Johnson if that proves to be
17 possible.

18 My Lady, you know that Mr Johnson also holds an old
19 phone which was turned off in 2021 for security reasons.
20 Neither Mr Johnson nor the Inquiry have the technical
21 expertise to ensure that the contents of the phone can
22 be downloaded safely and properly, particularly bearing
23 in mind the overarching need to ensure that no damage is
24 done to national security. We have therefore agreed
25 that this phone should be provided to the appropriate

26

1 believes, to use its phrase, is unambiguously
2 irrelevant.

3 So, my Lady, the concluding point is we will shortly
4 gain access to all the material on an unredacted basis.

5 Turning back to the submissions from the
6 core participants, requests have been made by some of
7 them for disclosure of correspondence with material
8 providers, including the Cabinet Office, with whom
9 the Inquiry has been engaging over this time concerning
10 perceived non-compliance.

11 My Lady, where it's necessary, the core participants
12 will be informed of issues of non-compliance, but may we
13 suggest that it's not necessary or appropriate to
14 disclose to the core participants the detail of the
15 discussions or the correspondence with material
16 providers.

17 It may be thought that the Inquiry has proved itself
18 quite capable of dealing with issues of non-compliance.

19 Finally, in relation to the material from material
20 providers, there are two other matters to which I would
21 like to draw your attention, and they concern the DHSC,
22 the Department of Health and Social Care, and the
23 United Kingdom Health Security Authority(sic), the
24 UKHSA.

25 My Lady, in relation to the DHSC, the initial Rule 9

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1 request was issued on 20 September 2022. Whilst we have
2 received and disclosed a first corporate statement from
3 DHSC, and we're grateful to it for that, there are two
4 other further statements outstanding covering the period
5 from August 2020 to February 2022 and a number of
6 supplemental statements dealing with topics such as
7 legislation, equalities, adult social care,
8 international co-operation and devolution.

9 The deadlines for disclosure of those documents have
10 been extended but are now overdue. They have been
11 missed. May we invite, please, the DHSC to clarify the
12 position in relation to those documents.

13 Secondly, in relation to the UKHSA, it received
14 a Rule 9 request in October, deadlines for its draft
15 statement have passed and, despite further extensions,
16 only two parts of the statement have been provided.
17 A significant majority, therefore, remains outstanding.

18 The Inquiry received on Friday a further application
19 for more time. The Inquiry agreed to a modest further
20 extension, but we do need to know what the UKHSA's
21 position is in relation to that, and whether or not we
22 will receive that material forthwith.

23 My Lady, may I then turn to the issue of the request
24 made in some of the written submissions from the
25 core participants to the effect that the Inquiry

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1 are considering or providing observations on a large
2 number of Rule 9s which will be disclosed over the
3 coming weeks. The remainder of the Rule 9 responses,
4 those which we've either not received and disclosed or
5 which we're currently considering, are expected to be
6 received in draft form over the next two months.

7 We have disclosed some 17,500 documents to the
8 core participants, including those Rule 9 statements,
9 and around about 273 questionnaires and supporting
10 documents. We've disclosed thousands of documents from
11 the Department of Health and Social Security, narratives
12 from the Cabinet Office which set out a chronology of
13 meetings and of communications, minutes detailing the
14 events of COBR meetings, Cabinet meetings and meetings
15 of the ministerial implementation groups. We have
16 disclosed corporate statements from a number of
17 government bodies and, over the next few days, will be
18 providing corporate witness statements and exhibits from
19 the Treasury, the Equality Hub in the Cabinet Office,
20 witness statements from Cabinet Office witnesses, and
21 witness statements on behalf of a number of regional
22 mayors.

23 My Lady, there are tens of thousands of documents in
24 the process. Around about 9,000 are already with
25 material providers awaiting a final review and

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1 disclose to core participants the Rule 9 requests that
2 you have directed be made in Module 2. As I've said,
3 they amount to many hundreds of Rule 9 requests.

4 My Lady, you will recall that in the confines of the
5 preliminary hearings in Module 1, and in fact also
6 Module 2, you had considered but ultimately went on to
7 refuse this request. We'd respectfully suggest that
8 there is no proper basis for revisiting your ruling.

9 Disclosure to the core participants of the Rule 9
10 requests themselves, as opposed to the relevant
11 documents and materials which are generated by them, is
12 neither required by the rules nor generally established
13 by past practice.

14 In any event, of course, the core participants are
15 starting to receive the Rule 9 statements and documents
16 that are the fruit of this process.

17 We will, however, draw up a comprehensive list of
18 every person or body that has been sent a Rule 9, and
19 I believe that list is under preparation and will be
20 provided in the next day or two.

21 Turning, then, my Lady, to the issue of the general
22 state of disclosure of documents to the
23 core participants. Seven Rule 9 statements and --
24 corporate statements and two individual Rule 9
25 statements have been disclosed. We've received and we

30

1 confirmation that they can be disclosed to the
2 core participants at our direction. Around about
3 24,000 are in the review process, which you'll recall
4 from previous hearings is the process whereby there is
5 a first and then a second-level review by the Inquiry
6 team on relevance.

7 We've received material from around about
8 70 organisations, and that material in the main will be
9 disclosed, as I've said, by the end of July.

10 The pace at which the Inquiry paralegals and lawyers
11 have conducted that first and second level review has
12 gone up dramatically since we last met, due to the
13 considerable further resources made available, and their
14 massive hard work.

15 Save for the materials which it knows to be
16 outstanding, and anything which results from further
17 requests for disclosure which we may issue, the Inquiry
18 expects that it has now received the vast majority of
19 the disclosure relevant to Module 2. It will, as I say,
20 be swiftly reviewed and I'm very grateful to the
21 material providers who have provided it all.

22 We are confident the vast majority will be disclosed
23 by the end of July, that's to say the Rule 9 statements,
24 and that the vast majority of the documents which
25 accompany them, around about 40 to 50% of what we've

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1 received, because of course not everything is relevant,
2 will be received by the core participants by the end of
3 August.

4 By then, around 35,000 documents are likely to have
5 been disclosed, and, my Lady, that is a remarkable feat,
6 given that the first tranche was only made, by way of
7 disclosure to core participants, in December.

8 My Lady, on the subject of disclosure, a number of
9 requests have been made, specific requests have been
10 made by the core participants. One core participant has
11 asked about cross-module disclosure. We have that very
12 much in mind, and we will be making arrangements for
13 materials which are disclosed in Module 2 to be made
14 available in Modules 2A to 2C as appropriate, and
15 of course documents disclosed in Module 1 and 2 --
16 Module 1 commencing next week -- will be available on
17 Relativity for use in subsequent modules.

18 The Welsh Government have raised a query in relation
19 to the Inquiry's disclosure of meetings and emails and
20 material relating to the Westminster, the United Kingdom
21 Government's communications with the Welsh Government
22 over the decision-making from February and March 2020.

23 I can say that the disclosure that we've already
24 made includes narratives prepared by the Cabinet Office
25 in respect of key meetings with the Welsh Government,

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1 simply no justification for any complaint that
2 the Inquiry has been slow or dilatory. No Inquiry with
3 so wide a scope has ever proceeded with such speed. But
4 the Inquiry process is simply not designed to assemble
5 every single document and person relevant to the
6 preparation, for the response to, or the impact of the
7 Covid pandemic. That would be an impossible task, and
8 no sensible Inquiry could ever contemplate it.

9 What we've done is to seek the witnesses and
10 documents that you have considered are most relevant to
11 the issues that you've decided that you want to explore.
12 This is especially so in Module 2, because it's
13 concerned with the high level political and
14 administrative decision-making. It is not a module
15 enquiring into every aspect of every decision on Covid.
16 It's an inquiry into only such parts of the
17 decision-making process that appear to you to really
18 matter.

19 Even then, my Lady, we need to put the
20 core participants on guard that it is impossible to call
21 every witness who can give evidence of every issue
22 covered in every paragraph of the list of issues for
23 Module 2 that you have directed be produced. We have
24 neither the time nor the resources for this and
25 I daresay the core participants and the general public

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1 and so the Welsh Government should already have access
2 to that material. We're also seeking further materials
3 from the Cabinet Office and DLUHC, the Department for
4 Levelling Up, Housing and Communities, concerning
5 Whitehall's engagement with the devolved
6 administrations. When received, they'll also be
7 disclosed.

8 Another core participant had asked for a detailed
9 chronology of events, with references to underlying
10 disclosure or possibly chronological accounts of key
11 evidence themes. We have asked the Cabinet Office, the
12 UKHSA and the DHSC for chronologies of key events and
13 meetings, and they will all be disclosed in due course.

14 Finally, one core participant has asked that the
15 witness statements be disclosed on a rolling basis.
16 They are being disclosed on a rolling basis, other than
17 where we consider that the core participants would be
18 better assisted by making sure that the statement is
19 disclosed alongside its accompanying exhibits.

20 My Lady, may I then address you briefly on the issue
21 of timing, because I want to say something about the
22 very considerable progress that the Inquiry's already
23 made, and about the timing of the public hearing in the
24 autumn.

25 We've proceeded at a remarkable pace. There is

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1 would not wish it to be so. So choices will have to be
2 made as to which witnesses will be called at the public
3 hearing.

4 But, my Lady, there can be no doubt that by the time
5 of that hearing, sufficient material will have been
6 secured and disclosed and given to the core participants
7 to enable you to be satisfied you can conduct
8 an absolutely full and fair Inquiry.

9 Documents will necessarily continue to be received
10 right up to the date of the hearing, but the
11 core participants undoubtedly have the determination and
12 drive and their legal teams the skill and experience to
13 make it work.

14 Lastly, I must emphasise that although the law does
15 not give the core participants the right or the ability
16 to decide themselves what witnesses should be called to
17 be examined, you have asked the Inquiry to ask all the
18 core participants to tell us what issues should be
19 explored, which witnesses should be called, what should
20 be put to them, and what documents should be aired.
21 That is the sole purpose of the Inquiry having sent out
22 the provisional list of witnesses -- or, in due course,
23 the provisional list of witnesses, but already the
24 provisional list of issues, the proposed evidence
25 proposals in due course, and also the proposed

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1 questions.

2 All the core participants have been given the chance
3 to help decide what evidence should be publicly
4 ventilated and tested.

5 Few countries, my Lady, have established formal
6 legal inquiries investigating the many aspects of the
7 pandemic, but of those that have, the United Kingdom
8 Covid-19 Inquiry is the first to have reached public
9 hearings, because of course it commences Module 1
10 next week.

11 A number of countries have held independent
12 commissions led by epidemiologists and public health
13 economic experts, and many of those commissions have
14 indeed concluded. But, my Lady, they were not legal
15 processes. They did not have the force of law behind
16 them. They did not have powers of production. They
17 couldn't compel witnesses to attend. They couldn't
18 compel the production of material, as you have done
19 already in this Inquiry. And, therefore, they could not
20 provide the core participants or the public with
21 anything like a meaningful participation. They did not,
22 of course, address these issues with anything like the
23 same degree of scope and width.

24 My Lady, the next issue on the agenda concerns
25 expert witnesses.

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1 experts have referred to publications, the Inquiry be
2 provided with the articles, and that those are in turn
3 disclosed to the core participants. We have asked the
4 experts to provide the documents to which they refer,
5 quite naturally, or to include full references or
6 hyperlinks, and all that material will be made
7 available.

8 Importantly, at the previous preliminary hearing,
9 you directed that further experts be instructed to deal
10 with the issue of pre-existing structural racism, but
11 also other areas of pre-existing structural inequality,
12 intersectionality and discrimination. The Inquiry team
13 sought the views of core participants on who might be
14 best placed to assist it, to assist the Inquiry, and
15 we've considered the recommendations which they've
16 kindly made. We're in the process of instructing,
17 finalising the instructions to those experts, and they
18 include Professors James Nazroo, Tom Shakespeare,
19 Nick Watson and Clare Wenham, the leading experts on
20 discrimination relating to race and ethnicity, ageing,
21 disability and sex. So, my Lady, that task is well in
22 hand.

23 The Inquiry has also identified and is in the
24 process of instructing additional experts to consider
25 the position of children and people from the LGBTQ+

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1 We have set out in our note the position in relation
2 to the instruction of a number of experts,
3 Professor Ailsa Henderson, Professor Thomas Hale,
4 Alex Thomas from the Institute for Government, and
5 Gavin Freeguard, former programme director and head of
6 data and transparency at the Institute for Government.

7 The core participants are aware of the areas on
8 which all those experts are due to opine. The draft
9 report from Professor Hale has been circulated. We were
10 provided with a voluminous number of observations in
11 reply, and we've obviously been through those
12 observations and comments, and had to decide which of
13 them required a response from Professor Hale. He is in
14 the process of considering those comments and our
15 observations on his draft report, and I believe his
16 final report is due by the end of June.

17 A draft report from Professor Henderson has been
18 circulated, we're considering the core participants'
19 responses, and I believe that a further draft will be
20 provided in due course, once Professor Henderson has had
21 a chance to consider those comments.

22 The reports from Alex Thomas and Gavin Freeguard
23 will be shared with the core participants for their
24 observations in the next two weeks.

25 My Lady, one core participant has asked that where

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1 community with regard to discrimination and
2 inequalities. The CPs will be updated very shortly with
3 a copy of the confirmation that instructions have been
4 sent to those experts.

5 Lastly, we've decided that the report prepared by
6 Professor Clare Bamba and Sir Michael Marmot in
7 Module 1 should be disclosed to the core participants in
8 Module 2, and it was so disclosed on 31 May. But
9 together, that report together with all the additional
10 material that you have ordered be obtained from experts,
11 will ensure that inequalities are placed at the fore of
12 the Inquiry, and therefore will run through the entirety
13 of Module 2, as with the later modules.

14 On the subject of the list of witnesses, to better
15 ensure the timetabling of witnesses come August and
16 September, the Inquiry will begin this week writing to
17 certain core witnesses, through their legal
18 representatives, putting them on notice formally of the
19 hearing dates and to seek any dates to avoid.

20 My Lady, may I emphasise that those provisional
21 witnesses of course are, by necessity, provisional only.
22 We are awaiting further statements. Not all of them,
23 moreover, who are given notice will necessarily be
24 called, and some additional witnesses will have to be
25 written to later, once, of course, we've received

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1 observations from the core participants as to whom we
2 should call.

3 The Inquiry team thereafter proposes to send out,
4 likely at the end of June, a provisional list of those
5 witnesses who may be called to give oral evidence at the
6 public hearing, and the core participants will be
7 invited to make observations.

8 My Lady, because it's quite possible that we will
9 receive draft Rule 9 statements from further witnesses
10 after that date, the date upon which the
11 core participants will have given us their views as to
12 whom we should call, I can reassure them that we will
13 remain open to considering later requests for further
14 witnesses after that additional material has been
15 received.

16 My Lady, the next point on the agenda, the next
17 issue to be addressed concerns the call from Covid-19
18 Bereaved Families for Justice United Kingdom for
19 the Inquiry to receive oral evidence from its members in
20 the course of the Module 2 public hearing.

21 May I say that we do intend to call a range of
22 witnesses from across the bereaved groups and other
23 minority, vulnerable and marginalised groups who are
24 represented in this Inquiry. We're also likely to
25 formally introduce into evidence a number of the

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1 Evidence of how loved ones died, coupled with the
2 views, hugely moving views, of the makers of the
3 statements as to why they died and why they believe that
4 the deaths were contributed to [by] failings on the part
5 of the systems, does not go to Module 2. Module 2 is
6 concerned with the high level response of the government
7 in terms of its political and administrative
8 decision-making. What consequences in terms of the
9 individual circumstances of harm and injury, loss and
10 death which may have resulted cannot assist you in
11 examining the merits of those decisions at the point
12 that they were taken. But, as I say, my Lady, we are
13 nevertheless going to call a range of evidence where we
14 possibly can in Module 2 in order to meet that perfectly
15 understandable request.

16 My Lady, finally, in relation to some of the
17 practicalities relating to the hearing in October, the
18 Module 2 public hearing will begin, as will the Module 1
19 public hearing next week, with a film showing the
20 recorded views of some of those who have suffered so
21 much. The public hearing in Module 2 is scheduled to
22 last eight weeks, from 3 October to 7 December, with, at
23 present, two one-week breaks in the middle.

24 My Lord, it has been suggested that there be
25 a further preliminary hearing in late July or in

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1 responses to the impact questionnaires that we had sent
2 out.

3 But, my Lady, may I explain briefly why, in our
4 submission, it is simply not possible to call everyone
5 that the Covid-19 Bereaved Families for Justice Group UK
6 and other groups would wish us to call.

7 You have already ruled in principle on whether
8 evidence should be called from individual bereaved
9 families, and in your ruling of October following the
10 first preliminary hearing you said, in line with the
11 terms of reference which bind you, that evidence of
12 circumstances of death should only be admitted in this
13 and later modules if it is relevant to possible systemic
14 failings.

15 My Lady, the evidence of single deaths, however
16 awful, compelling and terrible, simply cannot
17 demonstrate of itself whether there were system
18 failings, as opposed to there having been a failure to
19 prevent that particular death. And you made clear you
20 needed no persuading that bereaved family members may
21 well have relevant evidence to give on particular areas
22 of systemic failings, for example the widespread use of
23 Do Not Resuscitate notices, but if so that evidence can
24 be called in the later modules where those issues are
25 under consideration.

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1 September, and that is under consideration.

2 My Lady, although not directly relevant to Module 2,
3 may I also just say something very briefly about Every
4 Story Matters, because it's found reflection in many of
5 the written submissions filed by the core participants.

6 My Lady, following a direction that you gave at
7 an earlier preliminary hearing, the Inquiry published in
8 April, on 27 April, a detailed document setting out in
9 a single place all the progress that had been made with
10 the listening exercise, Every Story Matters, together
11 with an open letter from Mr Connah, Secretary to
12 the Inquiry.

13 It has been made plain that a new and improved
14 online Every Story Matters web form would be launched,
15 and it was launched on 23 May, and it incorporates
16 a number of changes following feedback from
17 organisations and individuals, including from the
18 bereaved groups, who took part in user testing.

19 There is a new paper version of the web form,
20 a large print version and an easy read version, and all
21 of that will be made available for the launch on
22 13 June.

23 There is also a British Sign Language video
24 explainer, explaining how to take part. That will be
25 available, and we're exploring options for receiving

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1 Every Story Matters responses in British Sign Language
2 also.

3 My Lady, a public information campaign to encourage
4 participation in Every Story Matters will also begin
5 next week, including radio advertising, print
6 advertising, print and digital billboards, adverts and
7 the like. So, my Lady, that launch is imminent.

8 The Covid-19 Bereaved Families for Justice
9 United Kingdom and Covid-19 Northern Ireland groups have
10 requested that they be provided with commercial tender
11 documents relating to the prospective hiring of the
12 communications company that will necessarily be
13 assisting the Inquiry with Every Story Matters.

14 My Lady, it's simply not standard practice for any
15 public body to share documents whilst a procurement
16 process is under way, to protect obviously the
17 commercial process. Once contracts are awarded,
18 information about the contracts will be published on
19 Contracts Finder within 30 days of the contract being
20 signed.

21 The communications contract is likely to be signed
22 in late June, but I can say that 23red, with which
23 the Inquiry worked at one part of the first phase of
24 developing Every Story Matters, is no longer working
25 with the Inquiry and will not be doing so.

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1 hearing next week and digital access will be provided
2 later in the summer.

3 My Lady, I mentioned earlier the impact film which
4 is to be shown at the start of the Module 1 hearing.
5 A different film will of course be played at the start
6 of Module 2.

7 My Lady, the filming sessions are taking place
8 across the United Kingdom and further filming dates will
9 be announced in due course for Module 2. We would ask
10 interested core participants to submit volunteer
11 interviewees and they can do that by emailing
12 the Inquiry's engagement email address, which will be
13 provided with the filming dates.

14 My Lady, that concludes my opening submissions in
15 relation to the majority of the matters raised in the
16 written submissions and in relation to the
17 practicalities of this module.

18 May I lastly just seek permission from you, please,
19 to publish the core participants' submissions and the
20 CTI note.

21 My Lady, that may be a suitable place for a break
22 for the stenographer.

23 **LADY HALLETT:** Thank you very much. You have the permission
24 to publish the submissions and the CTI note. And
25 I shall return at 11.55. Thank you.

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1 My Lady, one group of core participants have raised
2 access to Every Story Matters by disabled people as
3 an issue. The evidence, my Lady, shows that most people
4 want to share their experiences online in their own time
5 and in their own way, and I can assure that group of
6 core participants that the online form has been designed
7 for and tested with disabled people in mind, and it can
8 work with a variety of assistive technologies.

9 My Lady, turning to the submissions made by the Save
10 the Children United Kingdom group and their affiliated
11 bodies. The Inquiry has decided that the open web form
12 is not an appropriate avenue through which to collect
13 the experiences of those currently under the age of 18,
14 due to obvious safeguarding risks, but we are developing
15 plans to ensure we understand the experience of such
16 people, and we will bring those shortly to your
17 attention for your consideration.

18 I should also add that the Inquiry has created
19 an ethical advisory group to provide an independent
20 ethical review of the research design and the approach
21 to Every Story Matters and, as you know, that group is
22 chaired by Professor David Archard of Queen's University
23 Belfast.

24 At least three panels of the commemorative tapestry
25 will be ready by the commencement of the Module 1 public

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1 (11.38 am)

2 (A short break)

3 (11.55 am)

4 **LADY HALLETT:** Right. Ms Maragh.

5 **Submissions on behalf of Covid-19 Bereaved Families for
6 Justice UK by MS MARAGH**

7 **MS MARAGH:** I'm still able to say good morning, my Lady.

8 I represent the Covid-19 Bereaved Families for
9 Justice, along with Pete Weatherby King's Counsel and
10 Anna Morris King's Counsel, instructed by
11 Elkan Abrahamson and Nicola Brook of Broudie Jackson
12 Canter.

13 My Lady, there are a number of bereaved family
14 members who are present in the Inquiry room, and who are
15 also following the proceedings live.

16 The Inquiry has received joint statements and some
17 written submissions from ourselves and Northern Ireland
18 Covid-19 Bereaved Families for Justice, which, my Lady,
19 we know that you and your team have read and accorded
20 careful consideration, and for that we're grateful.

21 We're also grateful for your opening update and also
22 Mr Keith's opening remarks.

23 Additionally, we are grateful for the opportunity to
24 address you orally. Mindful of the time constraints,
25 Ms Campbell King's Counsel, who leads the

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1 Northern Ireland team, and I have divided our oral
2 presentation to address the matters that our clients
3 raise.

4 My Lady, given the importance of the issues and the
5 strength of feeling in our respective client groups,
6 there will inevitably be some overlap. Ms Campbell
7 King's Counsel will lead on devolved issues as well as
8 matters of particular concern to the bereaved families
9 of Northern Ireland.

10 I will address you on the following topics, in
11 general terms, my Lady: Rule 9 requests, with particular
12 focus on the Cabinet Office issue, disclosure, list of
13 issues, provisional list of witnesses, expert witnesses,
14 Every Story Matters, commemorations and, briefly,
15 my Lady, the Inquiry venue.

16 The Cabinet Office issue and the redaction of
17 documents.

18 The Covid-19 Bereaved Families for Justice support
19 your robust approach to evidence gathering, my Lady, and
20 the use of section 21 notice in response to the
21 Cabinet Office's non-compliance with Rule 9 requests,
22 and the Inquiry's disclosure and redaction protocols.

23 They welcomed your ruling of 22 May, rightly,
24 my Lady, rejecting the Cabinet Office's submissions to
25 discharge the section 21 notice. We agree that the
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1 the police indicates that the Cabinet Office itself
2 considers that they may evidence criminal offences.

3 Secondly, the fact that the Cabinet Office did so
4 only after the section 21 notice was issued also raises
5 serious questions about the redaction process and for
6 which it may have been used.

7 Turning briefly, my Lady, to the matter of
8 Mr Johnson's WhatsApp messages and notebook, we note
9 Mr Keith King's Counsel's update on the Inquiry's
10 progress with material relating to Mr Johnson, which
11 have further raised questions of transparency on the
12 part of the Cabinet Office response to your Rule 9
13 request. In relation to the old phone, the families
14 remain concerned that all relevant material is disclosed
15 to the Inquiry.

16 My Lady, the Cabinet Office is the heart of
17 government and undoubtedly understands that public
18 bodies are obliged in the discharge of their duties to
19 act with candour, an undoubted pillar of good
20 governance.

21 Covid-19 Bereaved Families for Justice considers
22 that the Cabinet Office's response to the Inquiry's
23 Rule 9 requests, the redaction and withholding of
24 potentially relevant material from your investigation
25 demonstrates a lack of candour and undermines the
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1 determination of relevance falls to be determined by
2 you.

3 The families are deeply disappointed that the
4 Cabinet Office is persisting with its legal challenge to
5 your ruling, which the families see as a further step to
6 interfere with the Inquiry's independence and to control
7 the material it receives and what it can and cannot see.

8 The families also question the purpose for which the
9 redaction process is being used and the Cabinet Office's
10 candour in its responses to the Inquiry's request and
11 notice.

12 We make two brief observations, my Lady. Referrals
13 to the police forces. It is of note that some of the
14 documents that are the subject of the section 21 notice
15 which were produced to the Inquiry in redacted form are
16 the subject of the Cabinet Office referrals to two
17 police forces, not made at the time of the redactions,
18 but only after the issue of the section 21 notice
19 requiring their production to the Inquiry, and the
20 attempt on May 15 to maintain their non-disclosure.

21 My Lady, whilst we have not had sight of these
22 documents, we make two further observations in relation
23 to that issue.

24 Firstly, the fact that the Cabinet Office have
25 apparently referred to them -- to refer some of them to
50

1 sincerity of its statements that it will assist this
2 Inquiry in the discharge of its terms of reference.

3 Further, the conduct of the Cabinet Office risks
4 delaying your investigation, the progress of this
5 Inquiry, public confidence in the process, and your
6 ability, my Lady, to report and make recommendations in
7 a timely manner.

8 Quite frankly, it beggars belief that just a week
9 short of the commencement of oral evidence in this
10 Inquiry, your focus, that of your team, and the focus of
11 the bereaved families are being diverted by the
12 Cabinet Office's legal challenge.

13 My Lady, the conduct of the Cabinet Office rings of
14 obfuscation and, in our view, there could hardly be more
15 compelling evidence for the need for a statutory duty of
16 candour and associated legal tools to enforce it, as
17 called for by a significant number of chairs of previous
18 Inquiries, reviews and a wide number of bereaved family
19 groups, including the Hillsborough families and the
20 Grenfell families.

21 In the absence of such legal reform, my Lady, we
22 urge the Inquiry to adopt a fully transparent approach
23 to Rule 9 requests in dealing with the challenges to its
24 process.

25 Additionally, my Lady, position statements requiring
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1 proactive identification of issues and material which
2 may be contrary to their interests and requiring senior
3 officials to sign off on disclosure is a potent way of
4 ensuring candour in the current provisions.

5 In this regard, my Lady, we renew and rely on our
6 previous submissions inviting the Inquiry to request
7 position statements from state and organisational
8 institutions.

9 Turning, my Lady, to the matter of Cabinet
10 collective responsibility, we note Mr Keith
11 King's Counsel's update that the government may not wish
12 to rely on Cabinet collective responsibility at this
13 stage. That is welcomed news, and in the event that the
14 issue is resurrected in relation to other documents, we
15 would wish to be promptly updated and, my Lady, you have
16 our submissions in relation to process which we say
17 should be maintained.

18 Turning now to the issue of overdue corporate
19 statements and disclosure. We note the written
20 submissions of the Department of Health and
21 Security(sic) and the UK Health Security Agency, and
22 make the following brief observations.

23 The decisions and activities of both departments
24 were central to the UK's response to the pandemic, and
25 impacted significantly on the outcomes of those who

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1 We again note Mr Keith King's Counsel's update on
2 disclosure, but remain concerned that the delay in
3 compliance with disclosure requests and resourcing
4 challenges raised by government departments raise real
5 concerns as to the potential impact on the Inquiry's
6 Module 2 timetable.

7 My Lady, we ask that CPs be updated as to the
8 progress.

9 Turning now to the discrete matter of cross
10 disclosure raised by core participants. We support
11 FEMHO's submission for CPs to have access to disclosure
12 across modules, and no doubt Mr Dayle will address you
13 further on this matter.

14 On the issue of expert witnesses, we note CTI's
15 update on expert witnesses and the progress with draft
16 report. The families welcome the confirmation of
17 the Inquiry's instructions to experts on structural
18 racism and inequality. We also welcomed the Inquiry's
19 engagement with CPs on the identification of appropriate
20 experts to assist with this work, to which the bereaved
21 families with expertise in race and health equality
22 contributed. We ask that the Inquiry invites similar
23 input from the bereaved in relation to the drafting of
24 letters of instructions to the instructed experts on
25 structural racism and inequality.

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1 died, and in effect, my Lady, the bereaved families.

2 Whilst we do not in any way underestimate the
3 pressures associated with the general preparation for
4 this Inquiry, which is being undertaken alongside the
5 general work of the departments, the response of the
6 Department of Health and Social Care carries a ring of
7 institutional defensiveness, my Lady, blaming
8 the Inquiry from "the request for detailed information
9 for the two-year period of its investigation".

10 Government departments, including the Department of
11 Health and Social Care and UKHSA, would have known as
12 far back as May 2021, when the public inquiry into the
13 government's handling of the pandemic was announced,
14 that the actions of government ministers, officials and
15 civil servants would be scrutinised.

16 Covid-19 Bereaved Families for Justice would have
17 expected government departments, including the
18 Department of Health and Social Care, to anticipate the
19 need for additional resourcing to meet the rigours of
20 such an investigation.

21 We note that it is estimated that corporate
22 statements requested by the Inquiry in September of
23 2022, so over eight months ago, will be submitted to
24 the Inquiry in June along with other statements,
25 including that of Matt Hancock, for Module 2.

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1 Turning, my Lady, to the provisional list of issues.
2 Once again, my Lady, we welcomed the Inquiry's
3 engagement with CPs on the preparation of the list of
4 issues and await the Inquiry's response to the matters
5 submitted.

6 Covid-19 Bereaved Families for Justice urges
7 the Inquiry to list as specific issues for investigation
8 in Module 2 structural racism and inequality, austerity,
9 the treatment of the bereaved, and we support the
10 submissions raised by Long Covid group for the inclusion
11 of long Covid as an issue for investigation in Module 2.

12 In relation to structural racism and inequality,
13 my Lady, we of course welcome the Inquiry's commitment
14 to investigating the role of structural racism and
15 inequality during Module 2. As you would have noted in
16 our written submissions and previous oral submissions to
17 you, structural racism and the nature of racial
18 inequality across the United Kingdom and its impact on
19 the disproportionate numbers of black and brown people
20 who died during the pandemic warrant distinct analysis.
21 We therefore invite the Inquiry to expressly list the
22 investigation of the impact of structural racism on the
23 outcomes for black and brown people as a specific issue
24 during the investigation of Module 2.

25 In relation to austerity, we welcome the Inquiry's

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1 update that the issue of austerity is being considered
2 for specific investigation in Module 2.

3 Thirdly, the approach of the deceased and bereaved
4 people. As the Inquiry team are aware, my Lady,
5 Covid-19 Bereaved Families for Justice and
6 Northern Ireland Covid-19 Bereaved Families for
7 Justice have great concern about the treatment of
8 bereaved families and their loved ones, particularly in
9 connection with burial arrangements and the interference
10 with funeral rituals. We seek confirmation, my Lady,
11 that core political and administrative decision-making
12 about these matters will receive appropriate scrutiny in
13 Module 2.

14 In relation to long Covid, we welcome CTI's update
15 on long Covid and, as I have indicated, my Lady, we
16 support Long Covid groups' submissions that Module 2
17 should investigate the government's knowledge of and the
18 decisions taken in relation to long Covid, and we
19 specifically support their submissions for the six
20 framework questions to be put to witnesses during
21 Module 2.

22 Turning, my Lady, to the provisional witness list.

23 The voice of the bereaved in the Inquiry. Covid-19
24 Bereaved Families for Justice, having campaigned long
25 and hard for the public inquiry, are ever alive,

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1 Turning to commemorations, it remains a real
2 disappointment to the families that the Inquiry has not
3 seen it fit to devise a way of memorialising those who
4 have died, either through a proportionate amount of
5 material heard in the hearings, or by way of online
6 methods, or both.

7 My Lady, as we have said in previous written
8 submissions and oral submissions to you and
9 representations to your team, the families remain
10 willing to engage with the Inquiry to find a way forward
11 on this issue.

12 Final topic, my Lady, relates to the venue.

13 We are grateful, my Lady, for your opening remarks
14 touching on the venue, and we are equally grateful that
15 those remarks were mindful of the concerns raised by the
16 families. We appreciate that the identification of
17 a suitable venue and the fitting of suitable resources
18 and equipment is a balancing exercise. We appreciate
19 that time and resources are not finite, and we trust,
20 my Lady, that you will, in your presiding over
21 the Inquiry, take into account the matters raised by the
22 families.

23 Unless there are other matters or any other matter
24 that you would wish for me to address you further on,
25 those are my submissions.

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1 my Lady, to the breadth of your investigation which
2 necessitates the calling of a proportionate number of
3 witnesses. We are mindful of Mr Keith's update, and we
4 will continue to work with the Inquiry team, as we have
5 done in Module 1 and Module 2, to identify suitable
6 bereaved family members to give evidence in Module 2.

7 Turning now, my Lady, to Every Story Matters.

8 Our submissions are set out at paragraphs 34 and 36
9 of our written submissions, and we highlight the
10 following matters: firstly, my Lady, we welcome
11 the Inquiry's update in relation to 23red and seek
12 clarification of the position in relation to the
13 engagement of IPSO(sic) and M&C Saatchi. In relation to
14 the process of Every Story Matters, we remain concerned
15 that the project appears to focus on the collation of
16 themed reports which will be submitted to you as
17 evidence rather than the accounts of the bereaved.

18 Additionally, the families remain unaware of the
19 expertise and training of those who will be involved in
20 the evidence gathering and those who will be preparing
21 the reports and how the integrity of the online material
22 will be ensured.

23 My Lady, the reality is this: many of the bereaved
24 families have simply not engaged with Every Story
25 Matters, for the reasons I have set out above.

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1 **LADY HALLETT:** If I could just say this, really, rather than
2 ask you to address me further, Ms Maragh: as far as the
3 concerns of the bereaved are themselves concerned, I do
4 understand and I do understand how when people have been
5 demanding an Inquiry and they have to wait for some
6 time, how they can be upset by some of the decisions.
7 But, from my point of view, I have tried my very best,
8 given the constraints upon me, from the very outset of
9 this Inquiry to make sure that the bereaved and those
10 who suffered in other ways have been at the heart of
11 this Inquiry. I have ensured that the team are
12 conscious that the bereaved and others who have suffered
13 will be at the heart of the Inquiry. We are calling as
14 many witnesses as we feel we can in each module from
15 bereaved groups and others, but it has to be consistent
16 with the time constraints upon us and the other matters
17 of relevance.

18 So I have all these restrictions, but I am doing my
19 best. We have commissioned films from those who have
20 suffered, and in watching the final draft of one of
21 those films just yesterday, I learned of a practice in
22 relation to the burial of a lost loved one that caused
23 me huge concern, and I will ensure that we investigate
24 that matter, which just gives one example of why, if
25 only those whom you represent will contribute to Every

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1 Story Matters, I can learn more about issues that I have
 2 to explore. So I urge those of you, those whom you
 3 represent, to consider carefully before they say we're
 4 not doing enough. We are trying, and, with the
 5 assistance of groups like yours, then we can do as much
 6 as possible. We are holding community events around the
 7 country and I hope to attend some of them in person.
 8 I don't want just want to say, "I'll just read
 9 a report". I know how important it is to hear from
 10 people, and as much as time will allow I will go around
 11 the country, around the United Kingdom.

12 We are going to ensure that what people say online
 13 is properly considered and fed into the enquiries. So
 14 I'm trying in as many ways as we can think reasonably
 15 possible to ensure that people who have suffered are at
 16 the heart of this Inquiry, and that's all I can say at
 17 this stage.

18 I appreciate you probably don't wish to respond, but
 19 I thought I needed to get that off my chest. I'm sorry.
 20 **MS MARAGH:** My Lady, I am grateful. If I may just raise one
 21 brief or make one relation in response, and it is this:
 22 for Module 1, despite the engagement with the families
 23 and representations made, for you to hear from
 24 a proportionate number of the families, you're hearing
 25 from just one bereaved family across the groups. Now,

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1 interest to the observations that they will have just
 2 heard.

3 You know, my Lady, the very real engagement that our
 4 group leads, and indeed all of our bereaved families
 5 wish to have, and the very real support that we have
 6 shown your Inquiry as it has progressed. And you also
 7 know, and have articulated, the very real need for all
 8 the bereaved families to ensure that this Inquiry is
 9 meaningful, is thorough and is as effective as possible
 10 in scrutinising the evidence.

11 What that means for us in real terms is allaying
 12 rumour and suspicion, is identifying good practice, is
 13 exposing bad practice, and is ensuring insofar as
 14 humanly possible that lessons are learned so that during
 15 any future pandemic, for there is sure to be one, fewer
 16 suffer the great loss that so many of those whom we
 17 represent suffered in the last one, and we know you
 18 share those objectives, as indeed do your team.

19 My Lady, we're conscious that this preliminary
 20 hearing falls at a time when you and your team are
 21 undoubtedly overwhelmed with work, firstly in
 22 preparation for Module 1 commencing next week, as well
 23 as suffering the very real and significant diversion of
 24 resources as a result of the satellite litigation
 25 launched in the Administrative Court by the

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1 that, my Lady, does not sit well with the families. So
 2 we are encouraged by your response, and we look forward
 3 to continued engagement with your team for Module 2 so
 4 that you and your team hear live from those who lost
 5 their loved ones in this pandemic.

6 Thank you.

7 **LADY HALLETT:** Thank you, Ms Maragh. I totally support the
 8 point you make about engagement. That is the only way
 9 the core participants, like Bereaved Families for
 10 Justice UK, can participate properly, and I just urge
 11 people to think carefully before they say they're going
 12 to withdraw their engagement, because it will just make
 13 my task even harder.

14 So thank you very much.

15 Ms Campbell King's Counsel.

16 **Submissions on behalf of Northern Ireland Covid-19 Bereaved
 17 Families for Justice by MS CAMPBELL**

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

19 My Lady, I'm grateful, once again, for the
 20 opportunity to address you on behalf of the
 21 Northern Ireland Covid-19 Bereaved Families for Justice.
 22 Our clients are not able to be here in person, although
 23 some of them look forward to attending in person
 24 next week, but I know many are following online or will
 25 catch up online, and they will have listened with

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1 Cabinet Office.

2 It is testament to your commitment to overcome each
 3 obstacle that we are here today, keeping marching
 4 forward, notwithstanding those recent threats that
 5 challenge, as is put in the CTI note, or threaten to
 6 disrupt the Inquiry's progress, and we're grateful that
 7 you've given us this time today, notwithstanding those
 8 very real and competing demands.

9 Perhaps it's appropriate that I use some time at the
 10 start then to commend the Inquiry's work, and may I do
 11 so in two particular areas, although they have in common
 12 the reality that the Northern Ireland bereaved families
 13 learned about them and the detail of them online and
 14 through publications rather than through any actual
 15 participation in the Inquiry's process -- and for the
 16 moment that is not, if I may say so, a criticism.

17 Firstly, like the UK team, the Northern Ireland
 18 Covid-19 Bereaved Families for Justice unreservedly
 19 commend your ruling on the Cabinet Office attempt to
 20 persuade you to accept the argument that the provision
 21 of pre-filtered, pre-determined, pre-redacted documents
 22 satisfies its duties of disclosure and are consistent
 23 with its duty of candour.

24 The argument that those whose actions or inactions
 25 are to be scrutinised in this Inquiry should also be

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1 permitted to pre-determine what may be relevant is
2 a bold one, and it is one that we submit was and ought
3 rightly to be swiftly and roundly rejected.

4 That must be particularly so in an inquiry of this
5 magnitude and of this public importance, before the most
6 experienced of judges, and with, amongst other
7 functions, a duty to interrogate the detail of
8 government response, so as at least in part to restore
9 public confidence in governance during a pandemic.

10 It is, we contend, unfortunate, some of those whom
11 I represent might say offensive, that the bereaved
12 families who look to this Inquiry to provide answers see
13 the Cabinet Office not working constructively with
14 the Inquiry in the application of your ruling and
15 instead persisting to rally against it. The
16 Cabinet Office's argument that you were asking too much
17 of them really does ring hollow to those whose loved
18 ones paid the ultimate price.

19 And it's particularly unfortunate, as has just been
20 observed by my learned friend Ms Maragh, that
21 notwithstanding that this issue has been a live one for
22 as many as six months and, in real terms, for a great
23 deal longer than that, because the requests you have
24 made were obviously always going to be made, it is
25 unfortunate that the Cabinet Office has allowed or

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1 apparently posed to the former Prime Minister,
2 Mr Johnson, had been publicised and circulated on
3 Twitter.

4 How it is that media obtained copies of the
5 questions that core participants were denied is perhaps
6 a question for another day, but it is right that we
7 applaud those questions, if indeed they were posed.
8 Whilst the medium in which they were revealed was
9 perhaps of little reassurance, it was plain from reading
10 those Twitter feeds that the questions posed by you and
11 your team to the former Prime Minister are clear,
12 unambiguous and reflect a great many of the concerns of
13 the bereaved families. It remains to be seen,
14 of course, how forthright the answers are when they
15 come.

16 But, my Lady, those two issues really serve to
17 highlight the primary and interrelated concerns of the
18 Northern Ireland bereaved families on the approach to
19 the Inquiry and to Module 2 in particular.

20 Firstly, we are concerned to know that the Inquiry
21 has access to all potentially relevant disclosure
22 related to its very broad terms of reference, and,
23 secondly, the question is to what extent will
24 the Inquiry permit the Northern Irish bereaved to
25 actively and effectively participate in this process.

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1 enabled a situation wherein this dispute has
2 overshadowed the work towards the Inquiry opening
3 next week and is in fact now to be resolved by the
4 Administrative Court right in the middle of those
5 Module 1 hearings.

6 The damage that has already been done to public
7 confidence is written large across media outlets, but
8 the tolerable that it is taking on the Northern Irish
9 bereaved, largely hidden behind closed doors and
10 expressed over kitchen tables from which loved ones are
11 absent, is really immeasurable.

12 My Lady, your team has the full support of the
13 Northern Irish bereaved in resisting the application for
14 judicial review. The arguments raised against your
15 ruling are, we contend, unsustainable in law and,
16 I'm afraid, ill considered in their practical effect and
17 should be rejected.

18 The second issue on which we commend you, my Lady,
19 is another to which we have had our attention drawn
20 through the media, in this case through Twitter.

21 We have, as my Lady knows, for many, many months
22 sought to persuade you to disclose the detail of Rule 9
23 requests that have been issued to individuals and
24 organisations, and it was something of a revelation last
25 week to discover the detail of many of the questions

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1 In relation to that, we have a number of
2 observations, I think four or five in number.

3 Firstly, it is deeply disappointing that the Inquiry
4 continues to be faced with inadequate or delayed
5 responses to requests for statements and other material.
6 We have previously in written and oral submissions
7 raised concerns that the approach of the Inquiry to
8 witness evidence in this module, and indeed in Module 1,
9 is top heavy, and we understand why that is, and why the
10 primary requests for the accounts of government
11 ministers or departmental corporate statements have been
12 made. But of course sometimes when you ask for
13 corporate statements what you get in response is the
14 corporate line.

15 We note that this concern finds additional force in
16 the written submissions before you this morning,
17 my Lady, particularly from the TUC and indeed from
18 others. They are concerns that we still hold firm, and
19 the continuing delays around receipt of statements and
20 accounts of individuals in government departments really
21 serves only to exacerbate them.

22 Secondly, the manner in which the absence or
23 inadequacy of statements is being addressed by
24 the Inquiry, we submit, denies the families and indeed
25 the public the knowledge as to who it is that is doing

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1 the obfuscation, to what extent that is happening, and
2 why it might be.

3 My Lady, that is not to deny the very considerable
4 work that's clearly going on within your team to address
5 it and to manage it and to marshall the process. But if
6 a corporate statement or a minister's statement is only
7 disclosed to us in its final format, having had to be
8 cajoled or encouraged or even extracted under threat by
9 the Inquiry, to provide an adequate response over many
10 months, we must be permitted insight and a greater
11 degree of insight into that process, because that
12 process in and of itself may well go to the credibility
13 of the evidence that the Inquiry is to publicly hear.
14 It is clearly a matter of public interest, and it almost
15 certainly goes to the sincerity of any professed
16 willingness to learn future lessons.

17 So while we're grateful for what we have been told,
18 both in writing and indeed today, and we don't
19 underestimate the amount of work that is going on behind
20 the scenes, we submit that the curtain must be raised on
21 this activity in its entirety, we must know the cast who
22 are engaging in this behaviour, and moreover we observe
23 that to give any cover to the behaviour, to allow it to
24 happen in circumstances where we don't know who, what or
25 when, risks encouraging it.

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1 statement hopefully towards the end of the month,
2 together with another 400 or so exhibits. A total of
3 almost 1,300 exhibits under cover of two statements that
4 have taken over nine months to put together will be
5 given to the Inquiry in the coming weeks at a time when
6 Module 1 has already commenced, when attention is
7 diverted to a judicial review application, and we are
8 hurtling towards the start date of Module 2. It affords
9 precious little time for this Inquiry to consider them
10 for onward disclosure to core participants, undoubtedly
11 meaning, with the best will in the world and working
12 round the clock within your team, that we will have them
13 for a few comparatively short weeks before the hearings
14 commence.

15 My Lady, we mean no criticism of you or your team
16 when we observe that that is simply, from our
17 perspective, not good enough. The Northern Ireland
18 Covid-19 Bereaved Families for Justice, as we are doing
19 in Module 1, will find ourselves without enough hours in
20 the day to properly prepare for the full hearing if we
21 don't get this material sooner than the timeframe which
22 these departments are allocating to themselves.

23 Fourthly, my Lady, I note today -- and perhaps I can
24 take this rather shortly -- I was going to observe on
25 the difficulty in identifying really where

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1 So we ask: who are these actors who are delaying and
2 prevaricating and providing inadequate responses? And
3 allow us, please, to see that process in real time.

4 Thirdly, my Lady, applying even the greatest
5 optimism, of course all of us in this room must do that,
6 experience dictates that the Inquiry's aim of largely
7 completing disclosure by the end of July is likely, in
8 fact highly likely, not to be met.

9 Putting to one side the issue of WhatsApp and
10 Google Spaces and the magnitude of data and information
11 that will come, we hope, and come soon, from that
12 source, we only have to look at the response from the
13 Department of Health and Social Care to appreciate where
14 the delays will fall.

15 I preface my submissions, my Lady, with the
16 observation that undoubtedly a significant burden has
17 been placed on that particular department and that the
18 demands of the Inquiry are undoubtedly
19 resource-intensive.

20 But, my Lady, corporate statements that were
21 requested in September 2022, nine months later, are yet
22 to be delivered. Nine months. We are told in the
23 submissions that the first statement might be with
24 the Inquiry this week, together with exhibits
25 totalling 890. We are told we can expect its sister

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1 Northern Ireland fits within this module. We have
2 previously made suggestions on Rule 9 recipients and we
3 have not had any clarity on the extent to which those
4 have been accepted or actioned, but I note that there is
5 to be within the coming days a full list of Rule 9
6 recipients, and we look forward to receipt of that, and
7 we will work together with your team in relation to it.

8 We have had precious little Northern Irish-related
9 disclosure. The Cabinet Office had not yet managed to
10 identify disclosure relevant to Whitehall's
11 communication with the devolved administration in the
12 early days of the pandemic and indeed beyond. That came
13 as some surprise but we hope it has been resolved.

14 If I may, we would ask that, in addition to those
15 requests being made of Whitehall, particularly given the
16 very recent history in relation to disclosure, we would
17 ask that the mirrored requests are made of Cardiff,
18 Edinburgh and Belfast, so that we can scrutinise the
19 disclosure by way of a complete picture.

20 The combination of these issues, my Lady, really
21 reinforces the requests that we have been making for
22 some time, some might say the drum that we have been
23 beating. Primary concern is that disclosure is coming
24 too late for adequate consideration. A predictable
25 effect of individuals and government departments running

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1 down the clock with internal searches and delays in
2 prevarication is the inevitable reduction of time and
3 resources available for public scrutiny at the other
4 end, and that is increasingly of concern.

5 My Lady, we reiterate our request, and it will come
6 as no surprise, to have sight of, if not input into, the
7 Rule 9 requests. The revelations on Twitter reinforce
8 that, if I may say so. Having sight of those Rule 9
9 requests would be, firstly, instrumental in ensuring the
10 families' continued confidence in this process, but
11 secondly they are also likely to be the yardstick by
12 which the answers that come in response to them are
13 measured. And so we do invite you to reconsider
14 disclosure of those requests so that we can compare and
15 contrast the answers that come.

16 As has already been observed by Ms Maragh, it is
17 important and we know my Lady will hear from bereaved
18 family members as part of Module 2; Module 2, we submit,
19 will be significantly the poorer if it does not hear and
20 listen to those most directly affected, and it's
21 a submission that is echoed by many of the
22 core participants in the room today.

23 A significant measure of the adequacy of government
24 response is the impact that it had on those most
25 directly affected. We note what Mr Keith has said today

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1 experienced panel members could bring to this process.
2 And, given what we know to be the problem or the source
3 of delays, it is, we submit, unfortunate for the
4 Prime Minister to rely on perceived criticism around
5 delays as a reason to deny the fullest possible
6 scrutiny.

7 In relation to the list of issues, my Lady, we
8 endorse and adopt the submissions that you have heard.
9 We had made submissions, specific observations in
10 relation to the interface between this module and
11 Module 2C from a Northern Irish perspective, but we see
12 the sense in Mr Keith's submission this morning that
13 that interface is perhaps best ironed out when the list
14 of issues in relation to Module 2C is closer to its
15 final form. Our work in relation to responding to the
16 Module 2C list of issues is proceeding apace, so that we
17 can respond fully within the deadline, which I think is
18 next week.

19 My Lady, dealing then just briefly with expert
20 witnesses before concluding on Every Story Matters and
21 the tapestry.

22 We have been firm supporters of the Inquiry's
23 decision to approach expert witnesses, and we continue
24 to be. We are grateful to Professor Hale and
25 Professor Henderson for the care and detail in their

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1 by way of update and observations. Any submissions or
2 suggestions that we make going forward in relation to
3 those from whom you should hear will bear in mind at all
4 stages the need to assist the Inquiry's work in this
5 module and on the issues under consideration. But our
6 clients have a great deal to say, and although their
7 experiences and perspectives have been informed by the
8 magnitude of their individual loss, it is not limited to
9 that. So we urge you to take a generous approach to the
10 time allocated to hearing from the bereaved, and indeed
11 from other core participants in civil society, in this
12 module.

13 My Lady, I need say nothing about the issue of
14 Cabinet collective responsibility, given the update, and
15 we have referred in our written submission to our view
16 of the announcement in relation to panelists. We rely
17 largely on those submissions, but we also join forces
18 with the voices from the Cymru group in observing that
19 the opportunity for you to be assisted by panel members,
20 and particularly those with a detailed knowledge of the
21 devolved administrations, appears to have been missed,
22 in my submission, by the Prime Minister.

23 But it is not too late. We would strongly urge the
24 Prime Minister, through you, to reflect on that latest
25 decision, to recognise the value that diverse and

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1 report. The clarity of their report undoubtedly belies
2 the great effort and skill that went into drafting them,
3 but they are inevitably UK-focused and, although there
4 is a nod, and in some cases that is an underestimate,
5 more than a nod, towards Northern Ireland, we submit
6 that more can be gained from their expertise, and it's
7 really in that vein that we have provided detailed
8 responses which are intended to be constructive, and we
9 would ask that both the Inquiry team and indeed the
10 experts view them in that manner.

11 However, our responses are hampered in two regards.
12 Firstly, because of this habit of not giving us the
13 references upon which they rely, and we're grateful that
14 that observation has been taken forward with the
15 experts. But, secondly, by the ongoing non-disclosure
16 of witness statements from government departments and
17 ministers and indeed others. One practical consequence
18 of that, we submit, is that it may well be, on receipt
19 of further statements, that the experts do need to be
20 asked to consider and comment further; yet another piece
21 of work for those involved in this Inquiry occasioned by
22 the delay.

23 In relation to Every Story Matters and the tapestry,
24 our concerns have found their voice in those of
25 Ms Maragh. I think it can be summarised in this way:

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1 that at present the Northern Irish bereaved do not see
 2 their experience of grief or loss or trauma reflected in
 3 that tapestry artwork, nor for the moment in the
 4 outworking of the Every Story Matters, but we will
 5 persist in communicating with your team and those
 6 responsible to see how those issues can be resolved.
 7 Our clients remain very actively engaged, and my Lady,
 8 very willing to assist you in understanding their
 9 concerns but also reaching the conclusions that this
 10 Inquiry really needs to reach sooner rather than later.

11 Thank you.

12 **LADY HALLETT:** Thank you very much, Ms Campbell. In
 13 relation to that last point, I mean, I know that when
 14 you make offers of help you mean it on behalf of those
 15 whom you represent, and going back to the impact film,
 16 to which I referred earlier this speaking to Ms Maragh,
 17 the first impact film that's been produced, and I do
 18 hope will be able -- feel that they can watch it,
 19 because it is extraordinarily moving, and we will have
 20 to have a number of warnings before it is shown, but it
 21 shows a diverse group of bereaved people speaking about
 22 their loss in the most extraordinarily moving terms,
 23 and, as I said to Ms Maragh, introducing items that
 24 I hadn't realised I should be investigating. So it's
 25 not only very moving, but also very helpful. And two of

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1 **LADY HALLETT:** I did say the layout of this venue wasn't
 2 perfect, but ... are you by a microphone? I can't
 3 quite ...

4 **MS MITCHELL:** I am. It remains red -- oh, it's gone green,
 5 thank you.

6 My Lady, we have taken careful consideration of
 7 what's been said this morning and hope to restrict our
 8 submissions to less than 15 minutes. I'm obliged to the
 9 comments of the Chair and also Senior Counsel to the
 10 Inquiry.

11 There are seven discrete issues that I would like to
 12 raise.

13 The first simply is comment in relation to
 14 panelists. We note that a decision has only recently
 15 been taken that the Chair will sit without a panel.
 16 It's disappointing that a decision has been taken so
 17 late and in such proximity to the hearings, under
 18 explanation that the Prime Minister was conscious of not
 19 wishing to delay the production of a report from this
 20 Inquiry.

21 This desire doesn't seem to be a consistent approach
 22 of government in dealing with requests from the Inquiry,
 23 particularly as we've heard this morning in relation to
 24 Rule 9s.

25 The second issue is that of Rule 9 requests. The

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1 the most insightful participants do come from
 2 Northern Ireland on that film, so I am extremely
 3 grateful for the help that they have given, and I hope
 4 it does continue, and we're always prepared to listen.
 5 So I hope that message has got across.

6 So far as the disclosure of the Rule 9 request, as
 7 you may know, that was not the Inquiry team that put the
 8 Rule 9 request on Twitter. I think Mr Keith may or may
 9 not be able to help as to who it was, but it wasn't us.

10 **MS CAMPBELL:** I didn't think it was, my Lady.

11 **LADY HALLETT:** The last point really is in relation to
 12 timing. I do understand the very valid points you make
 13 about timing and the demands on everybody, the Inquiry
 14 team but also core participants. All I can say is that
 15 everyone needs to know that, as far as I'm concerned,
 16 these hearings for Module 2 will start in October, and
 17 so I'm afraid everybody, material providers, legal
 18 representatives, they're all going to have to work very
 19 hard, I'm afraid. But that's my present position.

20 So thank you very much for your submissions.

21 **MS CAMPBELL:** Thank you.

22 **LADY HALLETT:** Right, Ms Mitchell.

23 **Submissions on behalf of Scottish Covid Bereaved by**
 24 **MS MITCHELL**

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

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1 Scottish Covid Bereaved are obliged to Counsel to the
 2 Inquiry and the Inquiry legal team for providing the
 3 update that they have. It will come of course as no
 4 surprise to my Lady that the Scottish Covid Bereaved are
 5 concerned to understand that this process is not being
 6 carried out as it should by all government departments.

7 As ought to have been clear to those organisations,
 8 supplying insufficient detail suggests a lack of
 9 co-operation with the work of the Inquiry at the most
 10 fundamental level of the provision of specific
 11 information. The Scottish Covid Bereaved are grateful
 12 in respect of the transparent way in which Counsel to
 13 the Inquiry and the Chair is dealing with this matter,
 14 and anticipate that those in receipt of Rule 9 letters
 15 which have been responded to in a less than satisfactory
 16 way will now understand that they properly require to do
 17 so.

18 The Inquiry this morning and Senior Counsel to the
 19 Inquiry has mentioned the fact that repeated deadlines
 20 have passed and extensions have been required. It
 21 doesn't need me to highlight to the Chair that if
 22 repeated deadlines are allowed to pass with impunity,
 23 a deadline becomes no more than a suggestion by which
 24 date documents should be provided.

25 The way in which these Rule 9 responses have been

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1 dealt with does not provide the Scottish Covid Bereaved
2 with confidence that, where appropriate, the same
3 parties understand and are properly implementing their
4 disclosure duties.

5 We would ask this morning that the Chair, in the
6 event of further time limits not being obtempered, gives
7 consideration to what practical steps she can take in
8 order to highlight to those who are not responding
9 timeously to requests that this matter will not be
10 tolerated by this Inquiry.

11 Number three, the redaction of material and WhatsApp
12 messages.

13 We note of course what has already been said by the
14 Chair and Senior Counsel to the Inquiry that these
15 matters will shortly be addressed elsewhere. Briefly,
16 the Scottish Covid Bereaved wish to make some
17 observations which we hope will be heard and considered,
18 primarily by the Cabinet Office, given we understand the
19 view of the Chair and Counsel to the Inquiry already.

20 Again, it won't come as a surprise to the Inquiry
21 that the view of the Scottish Covid Bereaved is that
22 whatever is supplied, retracted or otherwise, the
23 process of consideration and retraction will have to be
24 carried out by the Inquiry. Given the very short
25 timescales left, caused by the unnecessary delay of the

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1 who died during Covid have heard so far from those who
2 have made the decisions, it does not inspire any
3 confidence that by obtaining only formal documents this
4 will suffice for us to be able to build a picture of
5 what was happening. Matters which may not strike the
6 Cabinet Office as relevant may be highly relevant in
7 context.

8 The Inquiry is, of course, best placed to have the
9 best insight into what is and is not relevant, and that
10 is why Parliament has enacted a statutory scheme which
11 places the Inquiry as the heart of deciding what is and
12 is not relevant.

13 Finally, what is being sought is written records
14 recording the work of public servants involved in taking
15 decisions which affected millions of people in the UK.
16 This Inquiry has repeatedly stated it will be robust,
17 and its actions to date support that claim. A robust
18 approach in the present circumstances is the ingathering
19 of potential relevant information in an unredacted form
20 and allowing this Inquiry, the body best placed to do
21 so, to carry out its job.

22 If parts of the documents are clearly irrelevant,
23 they can be redacted by the Inquiry. Only then can
24 there be confidence that the job is being done and the
25 application of the proper test for the disclosure and

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1 Cabinet Office, it is submitted that this in and of
2 itself should be sufficient for the Cabinet Office to
3 consider that matters should be passed unredacted to
4 this Inquiry.

5 If it carries out that redaction process first and
6 then gives it to this Inquiry, it means that the job has
7 to be done twice. At a most practical level, this will
8 no doubt possibly potentially delay this project
9 further.

10 We would respectfully submit that sending to this
11 Public Inquiry unredacted copies of everything would be
12 consistent with the Prime Minister's view that decisions
13 should be taken with a mind to not delaying the
14 production of a report by this Inquiry, and we would
15 commend this as a way forward to the Cabinet Office.

16 The second issue of concern is that the
17 Cabinet Office considers it is in a place to consider
18 what is relevant to this Inquiry, for only then could it
19 be assured that it is redacting things that it considers
20 are irrelevant. The Scottish Covid Bereaved do not
21 share the confidence of the Cabinet Office in this task.
22 This Inquiry needs to obtain and provide to
23 core participants documents that provide a transparent
24 insight into the working of government during a lengthy
25 period of national crisis. From what families of those

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1 that it is being done in a transparent way.

2 There can be no good reason for failing to provide
3 the documents requested to the Inquiry in an unredacted
4 form save for a pathological need to protect information
5 for its own sake rather than there being anything
6 intrinsic to the information that requires to be kept
7 secret. The government is or at least should be
8 answerable to the people. The public, through this
9 Inquiry, are entitled to know what decisions were taken,
10 by whom, and when.

11 Moving briefly on to the issue of WhatsApp messages
12 in particular.

13 In relation to WhatsApp messages and informal
14 methods of communication, we note that a request has
15 been made for over 30 Cabinet witnesses to provide
16 relevant information and that only three have complied,
17 including Mr Johnson, and even then there have been
18 redactions.

19 The Scottish Covid Bereaved remind the Inquiry of
20 the media reporting of Mr Hancock's book where it is
21 said:

22 "We now chew over big decisions elsewhere and
23 relegate formal meetings to rubber-stamping exercises."

24 It's therefore vital to understand where and when,
25 using these, for example, informal methods of

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1 communication, where these big decisions were being
2 taken, and that's why it's vital that this information
3 is captured and presented to the Inquiry in
4 an unredacted format to allow this to happen.

5 At the preliminary hearing on 1 March we stated that
6 anything less than full disclosure would be considered
7 as an attack on the integrity of both the UK and the
8 Scottish public inquiries by the Scottish Covid
9 Bereaved. We said that no individual, no matter how
10 powerful, can be allowed to interfere with the pursuit
11 of truth, justice and accountability in this Inquiry.
12 Those who lost their lives to Covid-19 deserve nothing
13 less.

14 At the time, Hugo Keith KC explained to the Inquiry
15 that each witness to the Inquiry had been asked to
16 disclose emails and other correspondence relevant to the
17 issues addressed in their proposed witness statements,
18 and informal or private communications about the
19 government's response to the Covid-19 pandemic to which
20 they were party.

21 He added that the documents include but weren't
22 limited to WhatsApp group messages, private messages,
23 email communications, contemporary diary or other notes,
24 and explained that he had cast the net widely and with
25 a fine mesh.

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1 understand that if a witness says, "I have some things
2 of relevance", then the position of this Inquiry is that
3 the information should be provided in whole in order
4 then to establish what is relevant and what is not
5 relevant.

6 What we ask, though, is where a witness says,
7 "I have nothing of relevance", in relation to a request
8 for informal communications, is that an end to the
9 matter? Is this primary consideration of all
10 communications the start and the end of that process?

11 Because the Scottish Covid Bereaved would submit
12 that the Inquiry should determine whether or not there
13 is anything relevant to the Inquiry, and not the person
14 from whom the informal communication method is
15 requested. Given the fact that we are told that formal
16 meetings were rubber stamped, it may be, for example,
17 vitally important about the organisation or the timing
18 of a meeting which would not perhaps strike anyone as
19 immediately relevant to the Inquiry, but in fact could
20 absolutely be so.

21 It's submitted that, despite the clear way in which
22 this has been asked for, it might not be clear to
23 witnesses that if any communication has been made by
24 a witness which relates to their involvement in Covid,
25 the data should all be made available for the Inquiry to

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1 In relation to Scotland, we have been advised by the
2 Scottish Ministers' counsel that the former First
3 Minister Nicola Sturgeon was asked for such informal
4 message but she has none. Ms Sturgeon is, of course,
5 due to give evidence along with the former Deputy First
6 Minister, John Swinney, Catherine Calderwood and former
7 health minister Jeane Freeman in Module 1 in
8 three weeks' time.

9 The Inquiry will know that there will be overlap
10 between witnesses to this Inquiry and witnesses to the
11 Scottish Inquiry.

12 A request has also been made in the same terms by
13 the lead solicitor Aamer Anwar for the Scottish Covid-19
14 Inquiry in relation to WhatsApp messages.

15 On 4 June on BBC Scotland a former health minister,
16 Jeane Freeman, appeared on the programme and was asked
17 for all WhatsApp messages and other materials to be
18 released. She stated, "Nobody's asked for these
19 WhatsApp yet from the Scottish Inquiry, so therefore
20 nobody's refused". We note that Ms Freeman limited her
21 comments to the Scottish Inquiry, but in light of all of
22 the foregoing, the Scottish Covid Bereaved have a number
23 of questions.

24 As previously stated, it's for the Inquiry Chair to
25 determine what is relevant or potentially relevant. We

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1 carry out this process.

2 Can we be certain that the witnesses are carrying
3 out this primary test correctly?

4 Further, apart from Ms Sturgeon, we are not aware if
5 any of the other Scottish witnesses relevant to this
6 module have considered whether any type of this
7 information ought to have been provided to the
8 UK Inquiry. We would submit that Ms Sturgeon and any
9 other Scottish minister should be no different
10 a position to the position of Mr Johnson, Rishi Sunak or
11 Matt Hancock, and that, if not already done, a request
12 should be made of the Scottish ministers to provide to
13 the Inquiry any communications held by informal means,
14 in order that the primary relevance test can be carried
15 out by this Inquiry.

16 My Lady, I only have a short number of comments
17 still to make, but I note the time. Would my Lady
18 prefer me --

19 **LADY HALLETT:** I've just been told, Ms Mitchell, that
20 Ms Heaven, who is speaking for the Covid-19 Bereaved
21 Families for Justice Cymru, can't be here this
22 afternoon, so if everyone will forgive me, and if their
23 tummies aren't rumbling too much, I would go on,
24 complete your submissions and Ms Heaven's.

25 **MS MITCHELL:** I'm obliged and I will take it short, my Lady.

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1 **LADY HALLETT:** Thank you.

2 **MS MITCHELL:** In relation to Cabinet collective
3 responsibility, we note the Cabinet Office may no longer
4 wish to rely on this principle, and we look forward to
5 hearing from Mr Chapman in this regard.

6 We would ask, rather than me reiterating it here,
7 that the Cabinet Office read the written submissions
8 provided in this regard to understand the position of
9 the Scottish Covid Bereaved.

10 As will be unsurprising, it is that the Scottish
11 Covid Bereaved are put short of the view that there is
12 no principle which, in the modern day, should prevent
13 proper scrutiny being brought to bear on the
14 decision-making process taken by publicly elected
15 servants in circumstances where the lives of millions of
16 people depend on those decisions being properly taken.

17 Five, disclosure to core participants.

18 We note the progress being made with disclosure for
19 Module 2 and the work being done to provide these as
20 soon as possible. We note the alarming number of
21 35,000 documents. We simply want to place a flag,
22 my Lady, to note that we are concerned that the number
23 of documents which were being disclosed means that there
24 will be little time for core participants to assess
25 these to a meaningful degree up to and before

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1 respect of all modules. We attended at the
2 familiarisation hearing this morning and it was
3 explained to us how the transcripts would work, and that
4 we would be able to intermit with those transcripts, by
5 way of highlighting, by way of editing, by way of taking
6 annotated notes. That's all well and good, until we
7 were told that, however, we can't keep those, and at the
8 end of the day those disappear. Which unfortunately, in
9 a practical sense, simply defies the point of the
10 process, because it means that there is no way of us
11 being able to record that.

12 We would ask that the Inquiry look into software
13 which would allow participants to save the annotated
14 transcripts in order to avoid duplication of work, so as
15 not to provide added expense to the public purse if that
16 work has to be duplicated after hours of the Inquiry.

17 These are the submissions for the Scottish Covid
18 Bereaved, unless there is anything further, my Lady.

19 **LADY HALLETT:** No, thank you very much indeed, Ms Mitchell.
20 As ever you make some important points, and the last one
21 I had no idea. I will see whether anything can be done.
22 If it can be done, we will do it, but I'm not sure, I'll
23 will have to check.

24 Could I also thank those whom you represent for
25 their participation in the first impact films, there

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1 the Inquiry is due to begin. We appreciate, and
2 of course desire, the remarkable pace that matters are
3 taking place, but we have to flag up the possibility in
4 the future that it may be we have to effectively let
5 the Inquiry know that questions that we are being asked
6 or things that we're being asked to contribute to can't
7 be meaningfully contributed to at that time until we
8 have a better grasp on disclosure.

9 We understand that we are having a great deal of
10 input into how matters are done, provisional list of
11 witnesses, provisional list of issues, proposed evidence
12 proposals, and even questions for witnesses. But all
13 those can only have proper input if we properly
14 understand the disclosure in advance. I appreciate it
15 will become a chicken and egg problem, but I simply flag
16 up at this stage that we may need to revisit that matter
17 and inform the Inquiry that we're not yet in a position
18 to answer timescales which have been set.

19 Number six, Every Story Matters.

20 We note that senior counsel explained that
21 the Inquiry does intend to call a range of witnesses
22 from across bereaved groups, and the Scottish Covid
23 Bereaved are happy to help in that regard. We also look
24 forward to seeing the first impact films on 13 June.

25 Finally, seven, a practical issue, and this is in

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1 should be a series of films, because, as I said earlier,
2 it was extraordinarily moving, and I know that Scottish
3 Covid Bereaved took part in it, so thank you very much.

4 **MS MITCHELL:** I'm obliged.

5 **LADY HALLETT:** Right, Ms Heaven, where are you? Over there.

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

8 **MS HEAVEN:** Thank you, my Lady. I only intend to make very
9 brief submissions, and you will be glad to hear that
10 I'll finish well before the lunch break, and thank you
11 for hearing me now.

12 My Lady, as you know, I represent the Covid-19
13 Bereaved Families for Justice Cymru. Many of those whom
14 I represent are not able to be here today, but they are,
15 as you will be aware, watching and listening intently.

16 My Lady, can I first address the recent decision of
17 the Prime Minister that you will not be sitting with
18 a panel. We understand that the Prime Minister is
19 apparently concerned about the length of time this
20 Public Inquiry will take to reach its conclusions.
21 My Lady, we know from being involved in Module 1 that
22 this Inquiry is working at breakneck speed. My Lady, we
23 know that you are determined to avoid unnecessary delays
24 because you have recognised the importance of learning
25 lessons as soon as possible, and those whom I represent

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1 fully support this approach.

2 My Lady, a thorough, rigorous and properly informed
3 public inquiry should not be placed at risk out of
4 a concern for public criticism about delay. My Lady, we
5 of course do not question your thoroughness in these
6 proceedings to date. However, we do consider that
7 a panel is going to be essential in later stages of this
8 Inquiry, particularly when considering the instruction
9 of further experts.

10 It should not lead to delay if appropriately
11 managed. Indeed, it should speed things up. The reason
12 we raise this issue now, of a panel, is to ensure that
13 there is a proper understanding of devolution and the
14 impact of Covid-19 in the devolved nations. As you
15 know, Wales, unlike Scotland, does not have its own
16 public inquiry, and as you know, in Module 1 we have
17 expressed some concerns that many of the draft expert
18 reports are largely insufficient in their consideration
19 of the devolved nations. We continue to submit that
20 this Inquiry and you, my Lady, would be significantly
21 assisted by panel representatives for each devolved
22 nation.

23 Now, of course, this decision, we understand, is not
24 a matter for you, it's a matter for the Prime Minister.
25 We are aware that you consulted with the Prime Minister,
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1 occasion the Inquiry has unfortunately, it appears, not
2 asked sufficiently detailed questions.

3 This has allowed certain very senior ministers in
4 the Welsh Government to simply not address key aspects
5 of their political life when they would or ought to have
6 known about pandemic planning in Wales. This risks
7 there being gaps in the Inquiry's knowledge in relation
8 to Wales for Module 1.

9 Now, clearly the Inquiry is entitled to assume
10 compliance with the duty of candour, but unfortunately,
11 certainly in the case of Wales in Module 1, some of
12 the Inquiry's very broad rule 9 questions have led to
13 vague answers, often lacking in sufficient detail.

14 In order to avoid further statements having similar
15 flaws in Module 2 -- and obviously, from our
16 perspective, in Module 2B -- and to save the Inquiry
17 chasing witnesses for multiple amended statements, we
18 would ask again that some consideration is given to
19 core participants being able to at least feed in to
20 Rule 9 requests, or the questions that your Inquiry team
21 draft, so that potential topics for inclusion can be
22 raised at the earliest possible opportunity with
23 the Inquiry.

24 My Lady, as you know, many of those whom I represent
25 were involved in their professional capacities with the
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1 or he consulted with you, prior to his announcement, so
2 we therefore simply ask that you consider inviting
3 a further discussion of this issue with the
4 Prime Minister, in particular well in advance of the
5 devolved nations' specific modules and in the case of
6 Wales.

7 If that process is to happen, we would value the
8 opportunity to be kept informed so that our members can
9 have an opportunity to further express and develop their
10 views and concerns to the Prime Minister through you in
11 a timely and constructive fashion.

12 Briefly, in respect of Rule 9 matters, I wish to
13 make the following submissions: my Lady, you've ruled
14 against the release of Rule 9 requests to
15 core participants and we note that Mr Keith has raised
16 this matter again today and made clear that your
17 decision remains. However, we do wish to raise this
18 topic once again in light of the deficient and, quite
19 frankly, wholly inadequate witness statements that have
20 been produced by some members of the Welsh Government
21 for Module 1. The vast majority of these witness
22 statements have simply failed to address, in sufficient
23 detail, key aspects of the pandemic planning and
24 preparation in Wales. Many of these statements do set
25 out the Rule 9 questions that have been asked and on
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1 Welsh Government, NHS Wales, and other institutions
2 associated with the pandemic and the response, and we
3 will be able to use this knowledge to flag to
4 the Inquiry certainly discrete relevant areas that ought
5 to be asked about in the Rule 9 process.

6 My Lady, in respect of disclosure, we make the
7 following short points: we invite the Inquiry legal team
8 to clarify the dates by which core participants can
9 expect witness statements and other materials to be
10 disclosed. As you know, in Module 1 many statements
11 have undergone revision, in part due to some of the
12 concerns about lack of detail that I've just mentioned.
13 As a result, in Module 1, core participants with very
14 little time -- it's left us with very little time to
15 review material prior to the substantive hearing
16 beginning in a week's time, and certainly in Wales we're
17 still waiting for key disclosure.

18 In order to avoid a repeat of this situation in
19 Module 2, we simply ask you to clarify as soon as
20 possible whether the deadline that you provisionally set
21 out at the end of July 2013 for outstanding disclosure
22 is a hard deadline, and that would be for the final
23 versions of statements to be released and also to inform
24 core participants of the volumes of statements that can
25 be anticipated around this date.
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1 My Lady, we welcome Mr Keith's indication a moment
2 ago that the Inquiry will keep core participants
3 informed of issues of non-compliance with your requests.
4 My Lady, we therefore ask the Inquiry to clarify whether
5 the concerns around the production of material by
6 a number of government departments in Module 2 includes
7 Welsh governmental bodies. As I have already indicated,
8 we are concerned that in Module 1 the Welsh Government
9 does not appear to have been engaging with the Inquiry
10 to a satisfactory degree. If this is the position in
11 relation to Module 2, then we consider that the Welsh
12 public should be told.

13 In respect of the Cabinet Office issue, those whom
14 I represent offer you their full support, and clearly
15 endorse the very powerful submissions that have been
16 made today on behalf of the other bereaved family
17 groups. As, my Lady, you will understand, the devolved
18 administrations will be watching these latest
19 proceedings very closely, because there is no doubt that
20 they will also hold large quantities of WhatsApp and
21 other communications that they will not want to disclose
22 to you.

23 On that point, my Lady, can we ask for clarification
24 whether the Welsh Government has also been asked to
25 disclose all WhatsApp messages and related

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1 between the United Kingdom Government and the devolved
2 administrations, to see how communication actually then
3 unfolded in Module 2.

4 So, in summary, we ask that these communications are
5 disclosed, if they've not already been disclosed, as
6 a matter of urgency.

7 Briefly on expert witnesses, we note that for
8 Module 1 many of the expert reports were in draft when
9 the evidence proposals were circulated by the Inquiry.
10 This naturally created difficulties for
11 core participants, not knowing what the final expert
12 report would say. Therefore, in Module 2 we ask you to
13 introduce a deadline for the service of final expert
14 reports to ensure that they are then served in advance
15 of your CTI's evidence proposals.

16 As to the substance of the draft expert reports, we
17 once again do raise a concern at the level of detail and
18 analysis in these reports in relation to Wales. As you
19 know, we've raised concerns about the lack of
20 specificity and the limited comparison between the
21 devolved nations and frequently a distinct lack of
22 analysis of the communication and interaction between
23 the devolved governments and the UK Government. We
24 obviously therefore look forward to receiving the
25 finalised expert reports, which we very much hope will

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1 communication, and an indication of their response?

2 As with the other bereaved groups, the Covid-19
3 Bereaved Families for Justice Cymru reiterate the
4 central importance of all bereaved families having
5 confidence in this Inquiry, and my Lady, those whom
6 I represent understand that you are taking all the
7 necessary steps to ensure that this remains the case.

8 We note what Mr Keith has said today in respect of
9 applications for a restriction order. In the event that
10 there is an application, we suggest, as we've done in
11 writing, that core participants should be permitted to
12 make written and oral submissions on the procedural
13 approach to be adopted, to determine such applications
14 and to grant the right to be heard on the substance of
15 each application.

16 We understand from what's been said today that this
17 is a matter which is to be determined at a later date,
18 subject of course to an application being made.

19 In respect of the disclosure of materials relevant
20 to Whitehall's engagement with the devolved
21 administrations, we were deeply concerned to note that
22 such disclosure has been delayed. Mr Keith touched
23 a moment ago on cross-disclosure between the modules.
24 In respect of Wales, it would assist in Module 1, which
25 of course is looking at the system for communication

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1 contain more analysis in relation to the issues that
2 I've just highlighted.

3 Finally, my Lady, the Covid-19 Bereaved Families for
4 Justice Cymru once again offer their continued support
5 to the commemoration and to Every Story Matters, and
6 they wish to make clear to you today that they will
7 continue to work with your team in developing your
8 understanding of the experience of the bereaved families
9 of Wales.

10 Thank you very much.

11 **LADY HALLETT:** Thank you very much indeed, Ms Heaven. I'm
12 very grateful for your offers of support as well.

13 Right, could we return, please, at 2.15.

14 **(1.15 pm)**

(The short adjournment)

16 **(2.15 pm)**

17 **LADY HALLETT:** Right, Mr Metzger?

18 **MR METZER:** Yes.

19 **LADY HALLETT:** I'd made a note to myself to look to my left,
20 but I'm afraid I hadn't found it in time.

21 **Submissions on behalf of Long Covid Kids, Long Covid SOS and
22 Long Covid Support by MR METZER**

23 **MR METZER:** Thank you.

24 My Lady, I address you on behalf of the Covid
25 groups. I shall start with specific issues relating

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1 directly to our clients, and then turn to wider
2 procedural issues.
3 My Lady, people with long Covid deserve answers.
4 Mr Keith King's Counsel has said on previous occasions,
5 and I agree, that transparency and public confidence is
6 core to the functioning of this Inquiry, and in the same
7 vein people suffering with long Covid deserve to know
8 what the government knew about the long-term effects of
9 this pernicious disease and what steps, if any, it took
10 when confronted with the reality of huge numbers of
11 people not recovering from it.

12 I acknowledge Mr Keith's comments today that
13 long Covid will feature in Module 2, despite its total
14 absence from the first draft of the list of issues, and
15 that some Rule 9 requests including questions related to
16 long Covid, but it is extremely disappointing that
17 detailed consideration is planned to be reserved for
18 Module 3 only.

19 We respectfully suggest that this position still
20 misses the point.

21 The fact that long Covid will be investigated in the
22 context of healthcare in Module 3 does not obviate the
23 need for a thorough investigation of government
24 decision-makers' recognition and consideration of
25 long Covid.

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1 the effectiveness of the government policies on
2 preventing and minimising long-term morbidity, and
3 whether there was adequate data collection and proper
4 use to respond to this and long Covid.

5 Secondly, and even more importantly, the draft list
6 of issues omits any reference to morbidity and
7 long Covid entirely, which has stunned us all. As it
8 stands, long-term morbidity has not been identified as
9 a discrete line of investigation in this module at all.
10 It frames the investigation on decision-making only
11 through the lens of its impact on mortality and
12 hospitalisations. This approach is myopic and far too
13 narrowly defined. It deprives my Lady from examining
14 the impact of decision-making on long-term morbidity and
15 long Covid.

16 I'm sorry to report that the complete omission of
17 long Covid in the draft list of issues has shaken our
18 confidence in the Inquiry's process. While of course we
19 welcome the comments today that long Covid will be
20 investigated in this module, we cannot express strongly
21 enough our and our clients' frustration at the failure
22 to reference long Covid in the list of issues.

23 We maintain that long Covid cannot simply be tacked
24 on to the list of issues like an afterthought, but
25 instead should be embedded as a key measure of the

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1 This is in relation to the spread and transmission
2 of Covid-19. These are matters firmly within the remit
3 of Module 2. This is a crucial and fundamental
4 distinction. Long Covid requires proper examination in
5 this module.

6 The building blocks of the investigation in this
7 module have been laid down, but most troublingly those
8 blocks have hitherto ignored our clients and their
9 concerns. My Lady, there is a problem which remains
10 unresolved despite months of direct correspondence and
11 repeated pleas to the Inquiry team. The problem, put
12 simply, is that Module 2's whole approach to long Covid
13 has been profoundly flawed. Long Covid was initially
14 overlooked in the context of Module 2. Following our
15 representations, it has been added, seemingly as
16 an afterthought, some Rule 9 requests, but its relevance
17 is still not appreciated. That is evident not least in
18 the approach to expert reports and the draft list of
19 issues.

20 First, none of the expert reports received to date
21 address long Covid, long-term sequelae or long term
22 morbidity. We are told that the expert reports are
23 drafted at "too high a level" to consider long Covid
24 specifically. This is lamentable. The Inquiry will be
25 deprived of the benefit of expert comparative opinion on

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1 adequacy of government and administrative
2 decision-making in the framework, necessarily informing
3 the direction of the Module 2 investigations.

4 So, my Lady, key foundational blocks to the
5 investigation of long Covid in Module 2 are glaringly
6 missing. Long Covid affects almost 2 million people in
7 the UK, over 3% of the population, and growing, and
8 I say it again, they deserve and are entitled to
9 answers.

10 We suggest that there are at least six broad
11 framework questions on long Covid which must inform the
12 investigations in Module 2:

13 1) What decision-makers' understanding of long-term
14 sequelae and long term Covid was.

15 2) What was the role of patient advocacy in the
16 recognition and response to long Covid?

17 3) Was data collection and modelling of long Covid
18 measured?

19 4) Was the prevalence and the risk of long Covid
20 taken into account when decisions like the imposition
21 and then easing of non-pharmaceutical interventions were
22 adopted?

23 5) How and to what extent did decision-makers warn
24 the public about the risk of developing long Covid and
25 take the disease into account in public health

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1 communications?

2 6) Whether 2 million people with long Covid today
3 was avoidable.

4 We are grateful for the express support from
5 bereaved families and other core participants. A change
6 in approach needs to start from now, my Lady, to give
7 proper effect to your stated declaration that
8 "investigation of how decisions were made, communicated
9 and implemented will include investigation of how
10 long Covid was considered in decisions on the
11 implementation of lockdown measures".

12 My Lady, I now turn to procedural matters. We have
13 heard your comments made to Ms Maragh this morning in
14 relation to evidence from affected groups. We
15 understand and sympathise with the immense challenges
16 you face in managing an Inquiry of this size, but we
17 repeat our call for the Inquiry to hear evidence from
18 survivors of long Covid.

19 Long Covid groups' evidence is essential to this
20 module investigating whether there was a systemic
21 failure by decision-makers in acknowledging and
22 responding to the risks of long-term morbidity. We urge
23 that direct evidence is heard from the Long Covid groups
24 to understand whether their suffering could have been
25 avoided.

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1 out, hopefully, some constructive procedural suggestions
2 to facilitate preparation for the substantive hearings.
3 Mr Keith's comments this morning have answered many of
4 those points and I do not seek to repeat our
5 submissions. At this stage I have two short additional
6 observations to make.

7 First, in relation to expert reports, we understand
8 that Module 2 will be relying on the expert report on
9 long Covid commissioned by Module 3. This is welcomed,
10 and we agree that Module 2's investigations will be
11 assisted by expertise on long Covid if this is provided
12 ahead of the Module 2 hearings.

13 We welcome confirmation that the expert reports from
14 Module 1 of Professor Bambra and Professor Marmot are
15 being disclosed in Module 2. We would repeat our call
16 for the expert reports from epidemiologists from
17 Module 1, namely the reports from Professor Jimmy
18 Whitworth and Dr Charlotte Hammer to be also disclosed
19 to Module 2 core participants.

20 Secondly, we note Mr Keith's comments this morning
21 that as the Inquiry is moving at pace, decisions will
22 need to be made about what evidence will be called and
23 what questions will be asked. If this leads to
24 the Inquiry limiting the scope of the investigations in
25 Module 2, we ask that this be made clear to all

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1 In addition, we share the concerns expressed by the
2 TUC, the bereaved families and the bereaved families
3 from Northern Ireland, that the evidence gathering
4 process is disproportionately focused on government
5 evidence. A failure to gather sufficient evidence from
6 organisations outside government may skew the overall
7 picture and prevent adequate scrutiny of the government
8 decision-makers.

9 My Lady, I addressed you at the last hearing on
10 long Covid being the first illness to be recognised
11 through patient advocacy. As you are aware, our clients
12 were compelled to form into advocacy groups because
13 decision-makers dismissed and overlooked their
14 suffering, causing that to be prolonged and become more
15 pervasive.

16 I reiterate, they remain willing to speak about
17 their unique experiences of advocating for the
18 recognition of long Covid to ensure the Inquiry is
19 equipped with the full picture. They are not only
20 impact witnesses but also have direct evidence of their
21 advocacy to influence decision-makers. This means they
22 played a direct and significant role in influencing
23 decision-makers to recognise and respond to the risk of
24 long Covid.

25 My Lady, I rely on our written submissions which set
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1 core participants.

2 I now turn to the wider issue of government
3 departments, particularly the Cabinet Office, and
4 disclosure.

5 I wish to end on a few short observations on this
6 topic.

7 Public inquiries concern accountability and are
8 created to restore public confidence and learn lessons.
9 The core tenets of public scrutiny and transparency
10 underpin every public inquiry, none more so than one
11 investigating decision-making in a pandemic that has
12 caused such widespread suffering and damage nationally
13 and worldwide.

14 It is shocking and frankly appalling that the
15 pillars to this Inquiry have been shaken by the
16 Cabinet Office's continued and wholly unmerited
17 resistance to providing unredacted disclosure and the
18 possible application for wide-ranging restriction
19 orders. It cannot be said honestly that it is in the
20 public interest to only hear half the story. The full
21 story must be shared to ensure that the whole truth
22 comes out.

23 I note that Mr Keith back at the first preliminary
24 hearing commendably spoke about the "targeted approach"
25 taken with the Cabinet Office disclosure, and even those

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1 many months ago stated that internal communications,
2 including WhatsApps including from the Prime Minister,
3 Number 10 and other senior officials, had been
4 requested.

5 Months later it is highly regrettable that the
6 Cabinet Office is deliberately obfuscating. We are also
7 concerned by media reports of a letter from
8 Cabinet Office to the Right Honourable Mr Johnson MP
9 asking him to submit his witness statements and exhibits
10 to Cabinet Office for redactions to be applied before
11 submission to the Inquiry.

12 The approach of government to disclosure creates
13 a dangerous precedent of exceptionalism by claiming
14 exceptional processes and procedures for itself which do
15 not apply to any other core participant. It is one rule
16 for them and another for everyone else. The optics are
17 terrible, and seemingly mirror many of the concerns
18 about the government's approach to rules throughout the
19 pandemic.

20 We are concerned to learn that the Foreign and
21 Commonwealth Department is now echoing the
22 Cabinet Office's approach.

23 We wish to commend my Lady respectfully for the
24 robust and proper approach you have taken on this
25 fundamental issue. We also endorse the important

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1 respect to Mr Johnson's phone containing messages up
2 until April 2021, he has asked for assistance from
3 Cabinet Office to turn on his phone so that he may
4 review them for relevance. As with all disclosure, we
5 firmly maintain that the Chair and no one else must be
6 the final arbiter of relevance.

7 Secondly, it may assist to allay any public concerns
8 to have the swift disclosure for the Rule 9 notices sent
9 to Mr Johnson and other members of the government. As
10 Ms Campbell King's Counsel has stated, the contents of
11 Mr Johnson's Rule 9, dated 3 February 2023, has been
12 reported in the press and on social media.

13 We similarly ask that the core participants,
14 including my clients, who have suffered such harm from
15 this disease, are provided with them through the formal
16 process.

17 My final observation is that given the current turn
18 of events, it is impossible not to conclude that the
19 government's approach is anything other than seeking to
20 protect itself and those now in power from full and
21 appropriate scrutiny under the wide terms of reference.
22 To allow the Cabinet Office to determine relevance of
23 all the material itself flies in the face of all the
24 objectives and purpose of this Inquiry.

25 My Lady, that is all I wish to say, unless I can

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1 well-merited points made by my learned friend Ms Maragh
2 for the bereaved families. We recognise that
3 regretfully, as judicial review proceedings are
4 under way, the question of redactions is no longer just
5 a matter for you for now, my Lady. Nonetheless, we wish
6 to express our dismay at the delay and unnecessary extra
7 expenditure this unwelcome litigation has spawned.

8 The present position is difficult to comprehend, not
9 least because the former Prime Minister, Mr Johnson, has
10 confirmed publicly that he does not object to disclosure
11 of his WhatsApp messages and diaries in unredacted form,
12 and has now belatedly provided some of the material.

13 Further, we are pleased to note that the question of
14 restrictions and Cabinet collective responsibility may
15 no longer be an issue. We support Mr Keith's request
16 that this be confirmed as soon as possible to avoid
17 further delay in disclosure to the Inquiry and onward to
18 the core participants.

19 We echo the bereaved families' request to you,
20 my Lady, that if the anticipated section 19 application
21 is made, that it is disclosed to all core participants
22 and that there is a formal process for submissions on
23 the issue to be fully ventilated.

24 I make two further points connected to issues
25 arising from Cabinet Office's disclosure. First, in

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1 assist you any further.

2 **LADY HALLETT:** No, Mr Metzger, thank you very much indeed.

3 In relation to the list of issues, I had understood that
4 the very valid points that you make were covered, but
5 I will -- having heard the disappointment that you have
6 expressed, and I understand, I will discuss with the
7 team whether greater specificity -- I never say that
8 word -- would be helpful. So I will discuss with them.
9 So thank you for the points you made.

10 **MR METZGER:** Thank you, my Lady, I'm much obliged.

11 **LADY HALLETT:** Thank you.

12 Right. Mr Friedman.

13 **Submissions on behalf of Disabled People's Organisations by**
14 **MR FRIEDMAN**

15 **MR FRIEDMAN:** Good afternoon, my Lady. I'm just waiting for
16 the furniture to be moved around. With gratitude. And
17 perhaps I should thank everyone for the work that's been
18 done on this building, because I've noticed the change.

19 Thank you.

20 **LADY HALLETT:** We haven't properly equipped us with lecterns
21 by the sounds of it, Mr Friedman.

22 **MR FRIEDMAN:** I'm told it's going to happen.

23 My Lady, thank you.

24 I represent the Disabled People's Organisations, or
25 the DPO, and they are Disability Rights UK, Disability

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1 Action Northern Ireland, Inclusion Scotland and
 2 Disability Wales.
 3 Given the matters under discussion today,
 4 particularly Cabinet Office disclosure, it's important
 5 to recall why this Inquiry is valuable to everyone, why
 6 it is valuable to our clients, and consequently why the
 7 stance of the Cabinet Office is so troubling.
 8 This Inquiry is like no other because Covid involves
 9 us all. No one and nothing is the same as before. The
 10 harm done is still felt. The harm to some is far worse
 11 than others. And from the Inquiry, people want truth,
 12 humility where it is due, and rigorous lesson learning
 13 for the inevitable next time.
 14 For those particularly impacted upon and
 15 marginalised, like disabled people, they want change.
 16 An Inquiry of this nature constitutes an exceptional
 17 form of open investigation and learning. We agree with
 18 what you have said before and what Mr Keith
 19 King's Counsel has said today: nothing else will
 20 cumulatively be able to draw together evidence, test it
 21 in public, mandate real accountability, involve
 22 core participants and create a legacy of fact-finding
 23 and recommendations like this Inquiry can. Indeed, the
 24 work envisaged by the terms of reference and provisional
 25 list of issues will empower the public at large to

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1 we hear that your counsel team this morning are actively
 2 engaging with that particular point.
 3 My Lady, in the Covid response, the opposite of
 4 vulnerable is not invulnerable, it is resilience, a word
 5 that is frequently used in government documents and
 6 forms part of the title of Module 1. However, one of
 7 the costs of focusing on groups as vulnerable is that it
 8 overlooks that they are marginalised precisely because
 9 they lack the assets, human, social, economic and
 10 institutional, to enable their resilience. That is why
 11 we have submitted that the consequence of any failure to
 12 plan for pre-existing inequalities identified in
 13 Module 1 is worthy as a Module 2 issue in its own right.
 14 All modules after Module 1 should serve to deepen
 15 the Inquiry's appreciation of what resilient society
 16 planning requires and how and why it was missing prior
 17 to Covid-19.
 18 My Lady, that is the context for the Cabinet Office
 19 objections to full and transparent disclosure. We
 20 support and endorse the Inquiry's approach to date, and
 21 say this: although the formal applicant seeking to
 22 withhold disclosure is the Cabinet Office, their tactics
 23 are sanctioned by this government, the Prime Minister,
 24 and his ministers.
 25 As of today, we know that the government are

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1 understand and say more about Covid in the future. All
 2 that is why, although Inquiries are commissioned by
 3 governments, they are for the people.
 4 I can deal with why this Inquiry is so valuable to
 5 Disabled People's Organisations, or the DPO, by focus on
 6 the provisional list of issues and two specific matters.
 7 The first is vulnerability; the second is resilience.
 8 On vulnerability, my Lady has repeatedly expressed
 9 your determination to investigate the consequences of
 10 inequality, and to that end you have described it as
 11 vital for Module 2 to examine the impact of
 12 decision-making on those who, in your words, are at risk
 13 or vulnerable or marginalised. The DPO strongly favour
 14 this approach and want to do all they can to support it.
 15 It is therefore welcomed that the provisional list
 16 of issues refers to the category of "vulnerable and
 17 at-risk groups" in several places. However, whereas the
 18 draft list appears to take the definition of these terms
 19 as a given, the evidence suggests that the concept of
 20 vulnerability was constructed over time, moving
 21 incrementally from a medical and shielding focus to
 22 a broader social and economic focus. How and why the
 23 vulnerable are recognised, defined and distributed to
 24 is, we respectfully submit, a key part of this module.
 25 So, again, it increases the value of this process that

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1 creating three problems that threaten the Inquiry's
 2 ability to get to the truth.
 3 The first problem concerns the Cabinet Office
 4 wanting to be the judge in its own cause as to what is
 5 potentially relevant and what is not.
 6 The second problem is unacceptable delay. Anyone
 7 remotely informed about the governance of Covid-19 will
 8 know that WhatsApp messaging played an important role.
 9 The Inquiry determined that it wished to see the
 10 messages as well as notebooks and diaries, and yet it
 11 took from 3 February 2023 to close of business on 26 May
 12 for the Cabinet Office to disclose that they did not
 13 have core documents concerning Mr Johnson.
 14 The third problem, which based on this morning may
 15 or may not go away, we don't yet know, is that
 16 government has been expressly willing to give
 17 the Inquiry the Cabinet minutes but has been saying up
 18 to now that they would not allow those minutes to be
 19 made public to core participants and the public at
 20 large. We are told they have cited the political, not
 21 legal principle of collective Cabinet responsibility.
 22 Taking the three problems in turn, for reasons
 23 detailed in our written document, we say the government
 24 is wrong in law and its approach is ill judged. Based
 25 on the update this morning, let me summarise where we

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1 understand things to have got to.
 2 First, on the production of the full specified
 3 documents, the Inquiry, as investigator and fact finder,
 4 has the power under section 21(1)(b) of the
 5 Inquiries Act 2005 to demand any documents that "relate
 6 to a matter in question at the inquiry". The word
 7 "relate" is a broad term, certainly synonymous with
 8 a power to mandate materials that the Inquiry considers
 9 potentially relevant, and when the scheme of the
 10 2005 Act is read as a whole, likely broader than that.

11 Dominic Cummings, Isabel Oakeshott, Matt Hancock and
 12 the Sue Gray report have all informed the public how
 13 important WhatsApp messages are going to be to this
 14 Inquiry. If multiple matters of state and policy were
 15 communicated outside the discipline of formal minutes
 16 and public recording duties, then the Inquiry needs to
 17 see the full picture.

18 But it goes further than that, what were once
 19 conversations in the corridors of power, not contained
 20 in any minutes or formal records, are now recorded. It
 21 is through WhatsApp messages that disabled people know
 22 that in November 2020 Matt Hancock allowed the whips to
 23 threaten funding for a learning disability hub if the MP
 24 for Bury North did not vote with the government on the
 25 tier system.

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1 finder. In no other investigatory process known to UK
 2 law would a party under investigation be allowed to
 3 redact documents for relevance as they go out the door.

4 Finally on this point, as the case law establishes,
 5 it is no good creating a dedicated expert tribunal under
 6 a senior judicial figure, with its specialist counsel
 7 and solicitors, at least two of whom, Mr Keith and
 8 Mr O'Connor King's Counsel, have been dealing with
 9 disclosure out of Cabinet and other sensitive parts of
 10 the government all their working lives, and then suggest
 11 that the document provider knows better.

12 Second problem, we are bound to say there has been
 13 improper delay in communicating to the Inquiry that the
 14 Cabinet Office did not have documents relating to
 15 Boris Johnson. The story continues to unfold, with the
 16 statement from the Cabinet Office, which my Lady ordered
 17 but the Cabinet Office has put onto their own website.
 18 It's dated 1 June. That statement catalogues serious
 19 mistakes. There is no justification for failing to tell
 20 the Inquiry from 3 February until 26 May that they did
 21 not have the documents, that Mr Johnson was refusing to
 22 release them or they had not secured them long ago.

23 Instead, the principal phone of Mr Johnson's
 24 premiership, the phone he used until May 2021, and any
 25 messages on it have been entirely unaccounted for until

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1 Instant messaging can show bias that other sources
 2 of evidence conceal, and those who reviewed these
 3 materials for relevance can themselves be prone to
 4 unconscious bias, especially if they do not appreciate
 5 certain forms of discrimination in others, or understand
 6 the full panoply of issues like the Inquiry will.

7 It would be wrong for a chair to allow any party to
 8 redact documents before the Inquiry has seen them, and
 9 no reasonably informed person could respect an Inquiry
 10 process that allowed that to happen. The idea that the
 11 Cabinet Office, as a state provider of documents, should
 12 enjoy some privileged status in this regard is neither
 13 recognised in the statute nor conceivable in a module
 14 where state decision-making is under scrutiny. No
 15 irrecoverable damage is done to privacy or other
 16 interests by providing unredacted documents, as
 17 the Inquiry will and must consider itself redacting
 18 documents that remain unambiguously irrelevant and
 19 strictly personal.

20 As understood from my Lady's ruling, analogies with
 21 criminal and civil proceedings in this context are plain
 22 wrong, because when trial parties dispute relevance, the
 23 judge will inspect the documents. The stance of the
 24 Cabinet Office is even more flawed, because it overlooks
 25 that the Inquiry is the investigator as well as the fact

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1 this week.

2 The third government problem is, as I stand, the
 3 government's still threatened opposition to full
 4 publication of documents such as the Cabinet minutes.
 5 Yes, their application has been made, but as things
 6 stand, that further threatened government-sanctioned
 7 delay and major challenge to the effectiveness of this
 8 Inquiry has not unequivocally been taken off the table.
 9 Until it is, we can only make a plea in the interests of
 10 all that the government pulls back clearly and once and
 11 for all.

12 Again, we have set out fuller reasons in writing in
 13 the hope that you will not need them and we will never
 14 have to argue them. But in summary, because time is
 15 short, and it's important for the public to know what's
 16 been going on, we do want to say why reassurance to you
 17 by the government on this issue is so important. The
 18 interest in maintaining the candour of Cabinet
 19 discussion at the time difficult decisions are made
 20 cannot rationally or justly prevent publication of such
 21 decisions in an Inquiry commissioned to study those very
 22 decisions. That is why we have cited the date of the
 23 government's decision to commission this Inquiry. It
 24 was in May 2022 when the issues now under investigation
 25 were no longer live and the benefit of confidential

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1 discussion had passed. However, it's the overall
 2 context that causes us to be so emphatic in our
 3 opposition.
 4 The Inquiry contains within its terms of reference,
 5 created by the government, an express aim to "consider
 6 how decisions were made, recorded and implemented". It
 7 is a provisional outline of its scope that "will pay
 8 particular scrutiny to the decisions taken by the
 9 Prime Minister and the Cabinet as advised by the
 10 civil service, senior political, scientific and medical
 11 advisers and relevant Cabinet subcommittees", and
 12 the Inquiry has just ruled, in disposing of the
 13 section 21.4 application, that there is "a need to
 14 investigate allegations that have been aired publicly
 15 regarding agreements between members of the government".

16 That cannot be done in a manner that satisfies
 17 public confidence if collectively agreed Cabinet
 18 statements go public whilst important but potentially
 19 embarrassing disagreements between ministers go
 20 unpublished.

21 My Lady, the rest of our submissions for today are
 22 in writing. I want to say one more thing about why this
 23 Inquiry is like no other and its diminishment cannot be
 24 tolerated. Unlike in any other legal proceedings that
 25 the Cabinet Office seeks to compare it to, the wisdom of

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1 **MR MENON:** I'm just waiting for a lectern.

2 **LADY HALLETT:** One lesson learned from today, more lecterns.

3 **MR MENON:** Thank you.

4 My Lady, I appear together with Jennifer Twite of
 5 counsel for the children's rights organisations, Just
 6 for Kids Law, the Children's Rights Alliance for England
 7 and the Save the Children Fund.

8 I will be brief this afternoon, my Lady, as you have
 9 indicated that you have read and considered our written
 10 submissions and repetition will not improve them.

11 There are four short but important points we wish to
 12 make today orally.

13 Firstly, since we drafted our written submissions,
 14 the Cabinet Office has applied for a judicial review of
 15 your decision declining to withdraw your notice under
 16 section 21 of the Inquiries Act 2005, requiring the
 17 production of specified documents in unredacted form.

18 We echo the submissions of other non-state
 19 core participants that this is a shocking and
 20 unprecedented development which raises serious questions
 21 as to the government's genuine commitment to a fearless
 22 and thorough Inquiry into its response to the Covid-19
 23 pandemic.

24 We have no doubt that your legal team will
 25 rigorously oppose the Cabinet Office's application in

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1 government policy and the competence of our governors,
 2 especially the Prime Minister and the Cabinet, are
 3 directly under scrutiny in this Inquiry. It cannot be
 4 forgotten that the Cabinet sat at the apex of what my
 5 colleague Adam Wagner has called the *Emergency State*.

6 There is an enhanced need for this Inquiry to
 7 scrutinise Cabinet decision-making and the mindset of
 8 ministers, given that the law-making powers provided
 9 under the Public Health Act 1984 granted so much power
 10 to the Executive above and beyond the scrutiny of both
 11 Parliament and the courts.

12 The Cabinet Office issues still at stake today
 13 therefore lie at the heart of the intended scope for
 14 Module 2, from WhatsApp messages to diaries to minutes.
 15 It would in fact undermine the very principle of Cabinet
 16 responsibility if the opportunity was missed to publicly
 17 examine how the government worked in this exceptional
 18 and fragile period of crisis.

19 My Lady, thank you.

20 **LADY HALLETT:** Extremely grateful, Mr Friedman, thank you
 21 very much indeed.

22 Right, Rajiv Menon King's Counsel? Mr Menon.

23 **Submissions on behalf of Save the Children UK, Just for Kids
 24 Law and the Children's Rights Alliance for England by**

MR MENON

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1 the Administrative Court so that the Inquiry can pursue
 2 all necessary lines of investigation and fully discharge
 3 its broad terms of reference.

4 We welcome my Lady's indication today that this
 5 unfortunate application for judicial review will not
 6 delay the Module 2 evidential hearings that are
 7 scheduled to commence on 2 October. We would also
 8 welcome some indication, although we recognise that this
 9 may be premature, about when in 2024 you anticipate that
 10 you will be in a position to publish your Module 2
 11 report.

12 Secondly, we wrote to your legal team on 11 May with
 13 our comments and observations on the proposed Module 2
 14 list of issues, and we await your ruling on this matter.

15 We are grateful for Mr Keith King's Counsel's
 16 clarification this morning as to the Inquiry's likely
 17 approach to school closures during Module 2. The only
 18 point I wish to reiterate today on this topic is that if
 19 you are intending to investigate, pursuant to
 20 paragraph 4(a) of the proposed list of issues, whether
 21 the right non-pharmaceutical interventions were
 22 considered by the government and whether they were used
 23 at the right time, then we presume that you will be
 24 looking at the full package of measures and
 25 non-pharmaceutical interventions deployed by the

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1 government, including the high-level decision to close
2 schools for all children except the children of key
3 workers and the most vulnerable children,
4 notwithstanding that there is to be a later module on
5 education and children with evidential hearings probably
6 in 2025.

7 We would welcome confirmation, if possible, that our
8 presumption is correct and that there is no need for the
9 children's rights organisations to worry about the
10 absence of any mention of children or school closures in
11 the list of issues, given the list is intended to be
12 indicative as opposed to exhaustive.

13 Thirdly, we understand that you have not been
14 persuaded, my Lady, that Sir Gavin Williamson,
15 Secretary of State for Education from July 2019 to
16 September 2021, should be sent a Rule 9 request during
17 Module 2.

18 This, to be blunt about it, is disappointing.
19 Exploration of the broad reasons for high-level
20 political and administrative decision-making on school
21 closures surely requires evidence from
22 Sir Gavin Williamson. Given the Secretary of State for
23 Education must have played a significant part in the
24 government's decision to close schools, we are
25 struggling to understand why he is not at the very least

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1 I have given specific instructions to the team to that
2 effect. So we will do what we can. But I appreciate it
3 must be frustrating when months are going past and you
4 can't see the result as yet, but I hope you will be able
5 to learn the answers to some of your questions very
6 soon."

7 A few weeks later, at an Every Story Matters webinar
8 on 23 March, a member of the Inquiry team stated that,
9 and I quote:

10 "There are a number of issues around engaging with
11 children and young people, and some quite high bars to
12 reach in terms of safeguarding and protections. We are
13 working with experts in children and young people's
14 engagement and participation, and hopefully will be able
15 to update people shortly on progress with that."

16 Today is 6 June, another three months have passed.
17 Mr Keith King's Counsel stated this morning that
18 the Inquiry is developing plans to ensure we understand
19 the experiences of children and that those plans will
20 shortly be brought to my Lady's attention for your
21 consideration.

22 With all due respect, this is precisely what
23 the Inquiry has been saying since the first preliminary
24 hearing last October. We are still in the dark as to
25 what, if anything, is happening behind the scenes. On

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1 being sent a Rule 9 request during Module 2.

2 It may be, on receipt of his witness statement,
3 should a Rule 9 request be made, that you conclude that
4 there is no need for him to be called live during
5 Module 2 and that his evidence can legitimately be
6 postponed until the later module on education and
7 children. However, until you have considered his
8 witness statement, and in particular his exact role in
9 high-level decision-making on the issue of school
10 closures, how can such a decision sensibly be made?
11 Consequently, we urge you to reconsider.

12 Finally, Every Story Matters. After Ms Twite
13 concluded her oral submissions on behalf of the
14 children's rights organisations at the second Module 2
15 preliminary hearing on 1 March, you made the following
16 observation, and I quote:

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

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1 the information we have been given, it appears that
2 little or no progress has been made, since you
3 acknowledged the importance of children being heard in
4 March, to ensure that the United Kingdom's more than
5 14 million children will not remain voiceless during the
6 Listening Exercise.

7 The children's rights organisations are justifiably,
8 with all due respect, worried that without a swift
9 action by the Inquiry to ensure the effective
10 participation of children, the window will close and it
11 will be too late. Without capturing the testimony of
12 children's first-hand experiences of lockdown, it will
13 be impossible to learn lessons from the decisions made
14 during the pandemic that impacted our youngest so
15 heavily, and mitigate some of the negative impact that
16 the pandemic inflicted on children.

17 We would welcome an update as a matter of urgency
18 and a clear timetable on when Every Story Matters
19 intends to make provision for children and allow them to
20 exercise their fundamental right to participate in the
21 Listening Exercise. And I stress the words "the right
22 to participate". Merely understanding the experiences
23 of children or holding focus groups is not enough. We
24 ask my Lady to give an unequivocal undertaking that all
25 children who wish to participate in the

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1 listening exercise will be given an opportunity to do
2 so, just as adults have been, otherwise Every Story
3 Matters is, in reality, every adult story matters, and
4 that simply isn't acceptable.

5 My Lady, those are our submissions on behalf of the
6 children's rights organisations.

7 **LADY HALLETT:** Thank you very much, Mr Menon. I accept
8 entirely the force of your remarks about capturing the
9 memories of children, and I undertake to pursue that
10 issue urgently. Again, I have pursued it in the past.
11 Maybe I should have pursued it even more, and I shall do
12 so today. I undertake to do so. So thank you very
13 much. And the other matters that you raise are
14 obviously also very important. I will also take those
15 into account.

16 **MR MENON:** Thank you.

17 **LADY HALLETT:** Thank you.

18 Mr Jacobs.

19 **Submissions on behalf of the Trades Union Congress by**
20 **MR JACOBS**

21 **MR JACOBS:** Good afternoon, my Lady, I appear on behalf of
22 the Trades Union Congress, the TUC.

23 I address firstly the refusal of the Cabinet Office
24 to provide full disclosure to this Inquiry. Our written
25 submissions briefly addressed the legal issues at play.

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1 ever more farcical. It is eight months now since this
2 module was opened and it is only four months to the
3 substantive hearings, but the Cabinet Office still has
4 not told the Inquiry what relevant content and WhatsApp
5 messages it holds, let alone disclosed them.

6 The former Prime Minister is seeking to circumvent
7 the Cabinet Office position by direct disclosure, and
8 the Cabinet Office is seeking to sway him with threats
9 of withdrawing legal fees. Another branch of
10 government, the Department of Health and Social Care,
11 has provided full disclosure of messages to this Inquiry
12 without any difficulty at all. It is chaotic and
13 desperate.

14 The underlying mistake of the Cabinet Office is to
15 approach this Inquiry as if it were a piece of civil
16 litigation in which it can hold on to and conceal
17 anything it doesn't consider relevant and deploy legal
18 argument as part of the game. This is not civil
19 litigation. It is a public inquiry designed to uncover
20 the true circumstances of a government's response to
21 a pandemic that cost many thousands of lives.

22 This public inquiry must inspire the confidence of
23 the public, but what the Cabinet Office suggests as
24 an approach, unashamedly, is counsel sitting with the
25 Cabinet minister, or whoever the relevant person may be,

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1 Those matters will now be for the Administrative Court
2 and we do not address them here, save to reiterate what
3 we consider to be a simple but important point. There
4 is significant focus in the Cabinet Office's application
5 of relevance, of possible relevance of unambiguous
6 irrelevance, but to us talk of relevance is merely
7 a lawyer's sleight of hand.

8 As Mr Friedman on behalf of the Disabled
9 Persons'(sic) Organisations a few moments ago
10 referenced, under the Inquiries Act 2005 you have the
11 power to require the production of any document that is
12 simply related to any matter under investigation. That
13 is the statutory test.

14 "Related to" has a broader meaning than "relevant
15 to", they are terms of art. It requires simply some
16 connection to your investigation and requires nothing by
17 way of probative value. That is considered much later
18 in the process.

19 It is quite clearly the statutory provision which
20 affords you, as the Chair of an Inquiry, a designedly
21 broad power to compel the production of documents. So
22 we say that the legal basis of the approach of the
23 Cabinet Office is thoroughly flawed.

24 We learn today, as we have in the media over recent
25 days, that the position adopted by the Cabinet Office is

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1 to decide for themselves what is irrelevant and can be
2 kept from the Inquiry. To the public, it would look
3 less like a robust public inquiry and more like turkeys
4 deciding whether to vote for Christmas.

5 We now have the issue of Cabinet collective
6 responsibility. Let's state in terms what is meant by
7 that. It is that if different ministers held differing
8 views, those differences of opinion should be kept
9 secret from this Inquiry. What an absurd approach to
10 a public inquiry. It is an approach of secrecy rather
11 than of truth, and we hope it is right that it is
12 an issue that is to be dropped and not resurrected.

13 The current government may have ordered this public
14 inquiry, but perhaps it did so reluctantly and without
15 actually wanting or being prepared to accept the
16 scrutiny that this Inquiry must bring to bear.

17 Irrespective of the merit of the novel argument the
18 Cabinet Office raises, there is something far more
19 important at play: the public interest. That public
20 interest is served by this Inquiry being allowed to
21 proceed without being frustrated.

22 To the more than a million key workers in the
23 pandemic, the willingness of ministers to be seen
24 clapping outside their homes and showing support for
25 key workers will ring hollow now that the Cabinet Office

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1 is fighting this Inquiry's work as it seeks to learn the
 2 lessons from the pandemic and save lives in the future.
 3 Those who risked their lives to fight the virus, who
 4 held the hands of the dying and helped loved ones say
 5 goodbye from afar, who kept our lights on, who produced
 6 our food and filled our cupboards, who staffed the
 7 testing centres, who drove the buses, the taxis and the
 8 trains that got nurses to work, who taught our children
 9 and who stayed at home to protect others, deserve more
 10 than this unedifying spectacle of government ministers
 11 resisting government communications being made available
 12 to an Inquiry concerned with government decision-making.

13 As the TUC's assistant general secretary Kate Bell
 14 has recently put it:

15 "The Covid pandemic impacted every single person in
 16 the UK, including millions of workers who put their
 17 lives on the line. The very least we all deserve is
 18 openness and transparency from those who took the
 19 decisions. The lessons we need to learn from this
 20 pandemic are too important for the government to play
 21 politics with. It must co-operate fully."

22 My Lady, I turn to the list of issues.

23 We have made written submissions, and as you will
 24 have seen we have called for the list to descend into
 25 far more detail, and certainly for our interests we

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1 Second, we also say it really underlines the need
 2 for more detail in the list of issues. Saying we're
 3 going to examine the broad reasons does not set
 4 the Inquiry or core participants on a clear course.

5 As in our written submissions, we are concerned that
 6 the lack of clarity in relation to education is but one
 7 example of an uncertainty that arises across a range of
 8 sectors: the transport sector, the communications
 9 sector, the manufacturing sector, the construction
 10 sector, and the retail sector.

11 On the list of issues, we also support the
 12 submissions made by the Long Covid group and their
 13 advocacy in respect of their six framework questions,
 14 and as recently as March of this year the TUC published
 15 a joint report with Long Covid Support which examined
 16 the effects of long Covid in the working population.

17 I turn to the scope of the evidence and Rule 9
 18 requests.

19 The picture as to the evidence gathering and the
 20 Rule 9 process is only really just emerging as we begin
 21 to see the first disclosed statements. As it appears to
 22 us, there is a significant focus on central government
 23 evidence. There is also some evidence from impact
 24 groups, as they have been described, which is obviously
 25 important and helpful.

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1 remain uncertain as to the extent to which the Inquiry
 2 is going to be considering adequately the extent to
 3 which core political decision-making on NPIs
 4 appropriately took account of and was influenced by the
 5 implementation and their effectiveness across the range
 6 of workplaces.

7 We take as just one example that of education.

8 Non-pharmaceutical interventions in schools, including
 9 but not limited to partial school closures, were a core
 10 part of the government strategy. We have a lengthy
 11 corporate statement from the Department of Education and
 12 some expert evidence which touches on the issue, but
 13 education receives not a single mention in the list of
 14 issues other than in the context of modelling
 15 educational and mental health impacts.

16 Mr Keith King's Counsel said this morning that
 17 of course there will be exploration of broad reasons for
 18 school closures, but detailed examination of the merits
 19 and operational impacts can only take place in the later
 20 module.

21 As to that, we make two points. First, if exploring
 22 broad reasons means really hearing from the government
 23 as to its rationale, but without the breadth of evidence
 24 to test it, then we would be concerned that that is
 25 insufficient including for Module 2.

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1 Then there is evidence from other professional
 2 organisations from outside the government that had some
 3 involvement with responding to and consulting with the
 4 government on NPIs and implementing them, but we are
 5 concerned that this group of evidence is very small.

6 By way of example, and returning to the issue of
 7 education, we are uncertain as to which professional
 8 organisations involved in consulting with the government
 9 and implementing NPIs, other than the TUC, the Inquiry
 10 is seeking evidence from in Module 2, and as far as we
 11 understand the answer is none.

12 Similarly, the Department for Transport has given
 13 a witness statement describing its liaison with industry
 14 partners, but we are not aware that any of those
 15 industry partners, apart from the TUC affiliated unions,
 16 have been approached for evidence, and we suspect that
 17 the same point can be made across a range of sectors.

18 As in our written submissions, if the Inquiry is
 19 persuaded to seek further evidence as suggested, the TUC
 20 would welcome an opportunity to liaise with the Inquiry
 21 to seek to identify the appropriate organisations. The
 22 evidence is important, we say, so that Module 2 can go
 23 beyond noting government rationale as to NPIs and really
 24 have the breadth of evidence in order to be able to
 25 challenge it.

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1 Finally, my Lady, it is important that I put on
2 public record the TUC's position as regards the funding
3 position for its legal representation. At the outset of
4 this Inquiry, you called for groups to work together so
5 as to focus and limit the number of core participants.
6 The TUC answered that call and is seeking to represent
7 union interests across England, Scotland, Wales and
8 Northern Ireland, and across a range of sectors,
9 including healthcare, social care, education, transport,
10 manufacturing, communications, retail and others.

11 So far it is seeking to do so as a core participant
12 in all six of the ongoing modules in which
13 core participant status has been granted.

14 The Inquiry has refused any funding for the TUC and
15 so it is self-funding. The TUC has been able to commit
16 £200,000 to its work on the Inquiry for the remainder of
17 the year, of which £150,000 is available to fund its
18 legal representation. That is approximately 20% of its
19 annual budget that is available for ongoing projects.
20 The spend is, therefore, a significant financial
21 commitment, at least as compared with the available
22 budget, which reflects the importance of the Inquiry to
23 the 5.5 million members of the TUC's affiliated unions.

24 Nonetheless, you will no doubt recognise, my Lady,
25 that that is nowhere near sufficient to allow adequate
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1 I think Mr Dayle, please.

2 **Submissions on behalf of the Federation of Ethnic Minority**
3 **Healthcare Organisations by MR DAYLE**

4 **MR DAYLE:** My Lady, I together with a counsel team of
5 Ms Elaine Banton, Mr Ifeanyi Odogwu and Ms Una Morris,
6 represent the federation of ethnic minority healthcare
7 organisations, FEMHO, and we are led by
8 Mr Leslie Thomas KC, and are instructed by the firm
9 Saunders Law.

10 As you are aware, FEMHO is a large multidisciplinary
11 consortium advocating on behalf of black, Asian and
12 minority ethnic health and social care workers.

13 Like others before us, we wish to register our
14 support for your recent ruling in the application by the
15 Cabinet Office under section 29 of the Inquiries Act.
16 We join others in agreement that the Inquiry and
17 the Inquiry alone are best placed to determine what is
18 and what is not relevant to your investigations, and as
19 such what redactions are reasonable on disclosure.

20 We are grateful that the Inquiry alerted us to
21 a contemplated section 19 application from the
22 Cabinet Office, and for the update provided this morning
23 by Mr Keith KC that this application will not be pursued
24 at this time.

25 It bears saying, my Lady, that FEMHO will oppose any
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1 legal representation. So it is that the TUC is
2 proceeding with a single junior counsel and its
3 engagement with the evidence is necessarily severely
4 constrained. We consider that the Inquiry will be
5 poorer for that limited engagement.

6 Funding was refused because the TUC is a substantial
7 organisation, which is accepted, and you considered that
8 there were no exceptional circumstances warranting
9 funding. We consider that the breadth and importance of
10 the TUC's interests and the extent to which its
11 involvement will be hampered without funding quite
12 readily amounts to exceptional circumstances.

13 Notably, as it stands, the TUC is quite possibly the
14 largest non-state representative core participant to
15 the Inquiry but one of the smallest in terms of its
16 resources for legal representation. That should be seen
17 as a problem.

18 I get to this, my Lady: we would welcome any
19 dialogue with the Inquiry that it's willing to afford us
20 which might involve these funding difficulties and which
21 would allow us to give some semblance of proper
22 representation across the range of sectors that the TUC
23 is seeking to represent.

24 My Lady, those are my submissions.

25 **LADY HALLETT:** Thank you very much indeed, Mr Jacobs.
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1 such application if it were to return at some later
2 point.

3 From our vantage point, and not being privy to the
4 particulars of these controversies as they unfold, we
5 wish to emphasise an overarching principle that shapes
6 this Inquiry. My Lady, that is the immense scope of
7 your investigative powers under the Inquiries Act.

8 This principle is illustrated in the case law, and
9 one example comes from the Leveson Inquiry, and is the
10 case of Associated Newspapers Limited v Leveson from
11 2012, where the Administrative Court validated the
12 Chairman's jurisdiction to determine the terms under
13 which witnesses could testify, more specifically in
14 conditions of anonymity.

15 In their judgment, the Administrative Court
16 pronounced:

17 "Above all, it is of the greatest importance that
18 the Inquiry should be, and seen by the public to be, as
19 thorough and balanced as is practically possible.

20 "...

21 "The public interest in the Chairman being able to
22 pursue the terms of reference as widely and deeply as he
23 considers necessary is of the utmost importance."

24 This decision of the Administrative Court confirms,
25 my Lady, that you are entitled to shape the course of
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1 this Inquiry, and take the appropriate steps to ensure
2 that your investigations are as robust and as fair as
3 possible.

4 Part of your role as Chair includes protecting and
5 upholding the duty of candour, which is also crucial to
6 maintaining the Inquiry's integrity. This duty,
7 emanating from the Latin word "candor", meaning purity
8 or sincerity, denotes an obligation for public servants
9 to act with honesty and transparency. In the context of
10 this public inquiry, it refers to the compulsion of
11 public bodies and public officials to be open and
12 transparent about their actions, decisions and any
13 errors or failures that may have occurred.

14 My Lady, your ruling on the Cabinet Office's
15 section 21 application also acknowledges the important
16 link between openness and transparency and the right of
17 core participants and the wider public to effective
18 participation in this Inquiry.

19 The government's initial response to the pandemic
20 forms an important focal point of this Inquiry. There
21 is a well-established public concern, as you astutely
22 noted, regarding former Prime Minister Boris Johnson's
23 initial reaction to the emergence of Covid. Did the
24 UK Government meet its systematic obligations during the
25 pandemic? Should they have taken more positive and

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1 a complete picture of areas of inquiry in your
2 investigations.

3 FEMHO submits that the key questions underpinning
4 Module 2 are, firstly, did central government perceive
5 the pandemic as a national threat necessitating the
6 invocation of a public emergency? If so, did this
7 framework inform and shape its decision-making process?
8 Areas of possible inquiry include the apparent
9 suspension of the public sector equality duty, alongside
10 what appears to have been a pattern of decisions not to
11 report Covid-19 deaths under the Reporting of Injuries,
12 Diseases and Dangerous Occurrence Regulations, or
13 RIDDOR.

14 The legality of any such actions under conditions of
15 a public emergency would be questionable without
16 an official declaration of derogation under Article 15
17 of the ECHR. A potential infringement on legality
18 emphasises the importance of thorough investigation.

19 Secondly, we submit that the role of societal
20 factors, including government decisions, in perpetuating
21 adverse racialised outcomes is a pressing area of
22 enquiry for Module 2. In the previous preliminary
23 hearings, structural racism has been recognised as
24 an important lens through which to assess government
25 decision-making.

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1 protective steps to safeguard lives? These questions
2 are fundamental to our understanding of the government's
3 approach to the Covid-19 threat.

4 From information that is already in the public
5 domain, it is clear that the attitude and curiosity of
6 our leaders about the emergency of Covid-19 played
7 a critical role in the early stages of the pandemic.

8 This was at a time when, quite literally, government
9 decision-making was a matter of life and death. The
10 scope of your investigation in Module 2, my Lady, ought
11 necessarily to be wide and deep and you are entitled to
12 pursue the lines of inquiry that will answer the
13 questions of core participants and the public.

14 On the points of canvassing evidence, we ask
15 the Inquiry to confirm whether the widest range of
16 communication evidence from social media communication
17 platforms has been requested from the Cabinet Office.
18 This includes communication on less obvious media
19 platforms such as Signal and Telegram. We note as well
20 that, in some instances, the Inquiry's Rule 9 questions
21 to some senior public officials have been published in
22 various press outlets and, as Ms Campbell pointed out
23 earlier, on Twitter.

24 In light of this, we invite you, my Lady, to publish
25 the complete set of Rule 9 requests so that there is

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1 FEMHO welcomes the identification of an expert on
2 structural racism to guide the Inquiry in this complex
3 terrain, and we note the names that have been mentioned
4 by Mr Keith's remarks this morning.

5 As set out in our written submissions, given the
6 limited time between now and the start of evidential
7 hearings, we consider it would be most time efficient if
8 CPs were given sight of the draft instructions to these
9 experts and the opportunity to make observations on the
10 scope of those instructions instead of waiting for sight
11 of the draft reports.

12 We also note Mr Keith's observations regarding
13 witness evidence and the Inquiry's laser focus on
14 high-level government decision-making. We welcome his
15 observation that the Inquiry will be calling a wide
16 range of witnesses, including from bereaved minority and
17 marginalised groups. We invite the Inquiry to consider
18 calling witnesses from FEMHO's large multidisciplinary
19 membership of health and social care workers precisely
20 on this issue and in this module, because the impact of
21 government decision-making on FEMHO's members at the
22 time those decisions were taken is particularly
23 illustrative on the soundness of these decisions. It
24 would also assist the Inquiry, we submit, in forming
25 a view about the decisions that should reasonably have

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1 been taken in the circumstances.

2 This Inquiry should delve into how and why
3 government decision-making, both at the central and
4 local level, failed to adequately consider, anticipate
5 or address the inequality that was exacerbated by the
6 pandemic. It must scrutinise why the government failed
7 to protect against the disproportionate deaths and poor
8 health outcomes suffered by ethnic minority healthcare
9 and social care workers and their wider communities.

10 FEMHO believes that it is only through confronting
11 uncomfortable and inconvenient truths that we can hope
12 to achieve real change and ensure that such failings are
13 never repeated.

14 Turning now to matters of procedure, we welcome
15 Mr Keith's confirmation that our proposal for
16 a comprehensive system of cross-module disclosure has
17 been considered and that a system will be put in place
18 to ensure that this is available during this module.

19 On another matter of procedure, FEMHO is concerned
20 by the lack of express reference to questions pertaining
21 to structural racism and racial inequalities in the
22 provisional list of issues, or indeed the public sector
23 equality duty.

24 In this regard, we support remarks made earlier this
25 morning by Ms Maragh on behalf of the Bereaved Families

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1 support the submissions by Ms Heaven earlier this
2 morning on behalf of the Bereaved Families for
3 Justice Wales regarding Rule 9 requests. We suggest
4 that the Inquiry provides full visibility of Rule 9
5 requests to CPs now, allowing for earlier identification
6 of relevant documents not included in the requests.
7 This will give the Inquiry adequate time to procure and
8 consider any such documents, ensuring a comprehensive
9 and thorough investigation.

10 In my penultimate point -- and we can take this
11 briefly -- we wish to associate ourselves with the
12 respectful and nuanced submissions that have been made
13 in respect of the issue of your sitting with a panel,
14 my Lady.

15 As you are aware, we raised this issue in our
16 written submissions and we will not seek to rehearse
17 these matters at this point.

18 So in closing, my Lady, FEMHO is strongly of the
19 view that the public has a right to know the decisions
20 that were made by government during the pandemic, the
21 actions that were taken, and the errors that indeed
22 might have occurred. We believe that only through this
23 process can we learn, grow and ensure that we are better
24 prepared for the next pandemic.

25 My Lady, we are grateful for your leadership in this

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1 for Justice. Without express reference, FEMHO considers
2 that there is a real danger that opportunities to
3 properly investigate the issue will be overlooked or
4 missed. This is an issue of critical importance that
5 raises unique questions and considerations and must,
6 FEMHO submits, be considered in isolation rather than
7 grouped alongside all the other heads of inequalities.

8 We also wish to highlight concerns about the
9 potential timing implications for evidential hearings
10 arising from witnesses, experts, Rule 9 requests, and
11 the list of issues. There is a strong possibility that
12 key disclosure, including witness statements, continuing
13 into July may identify individuals not included in the
14 provisional list due in June. We seek confirmation that
15 June will not be the final opportunity for CPs to submit
16 additional relevant names.

17 Furthermore, my Lady, we have previously offered
18 comprehensive feedback on experts and the provisional
19 list of issues, including specific observations on the
20 draft expert reports of Professors Hale and Henderson.
21 We await your indication on how our feedback has been
22 incorporated as soon as possible.

23 My Lady, with significant disclosure yet to be
24 released, there is a genuine risk that there may be
25 insufficient time to fill any identified gaps. We

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1 Inquiry, and we stand ready to support your efforts in
2 the pursuit of answers.

3 Unless there are any issues arising, my Lady, those
4 would be our submissions at this time.

5 **LADY HALLETT:** Extremely helpful, Mr Dayle, thank you very
6 much indeed.

7 We'll take a break now, and I shall return at 3.45,
8 when I'm going to hear from Ms Marina Sergides -- sorry,
9 I hope I've pronounced it correctly -- and then we will
10 hear from Ms Henke, Ms Drysdale and Mr Chapman.

11 Thank you very much.

12 **(3.28 pm)**

(A short break)

14 **(3.45 pm)**

15 **LADY HALLETT:** Right. Ms Sergides.

16 **Submissions on behalf of the Southall Black Sisters by**
17 **MS SERGIDES**

18 **LADY HALLETT:** I hope I pronounced your name correctly.

19 **MS SERGIDES:** You have, my Lady.

20 **LADY HALLETT:** Thank you.

21 **MS SERGIDES:** My Lady, I represent Southall Black Sisters,
22 led by Liz Davies KC, instructed by Public Interest Law
23 Centre. I am grateful for the opportunity to make oral
24 submissions given our previous indication that we would
25 not do so.

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1 I wish to raise two points in addition to our
2 written submissions, and I will be brief.

3 The first relates to Rule 9 requests. We support
4 the written submission made by the children's rights
5 organisations that the Home Secretary at the relevant
6 time, Priti Patel, should be served with a Rule 9
7 request. Her and her department's awareness of the
8 potential implications of lockdown on domestic abuse,
9 both in anticipation of the first lockdown and the
10 lessons learned from the first lockdown for subsequent
11 lockdowns, are relevant.

12 Furthermore, we submit that Rule 9 requests should
13 also be served on units within the Home Office, namely
14 the violent crime reduction unit and the unit on
15 enforced marriages in particular. This is a matter we
16 have raised in previous written submissions and it is
17 clear that both units held information relating to
18 domestic abuse against women and girls before and during
19 the pandemic.

20 This is information that may have been essential to
21 decisions mad relating to three key areas, namely
22 identifying potential victims of domestic abuse,
23 communicating information about potential victims of
24 domestic abuse across government departments, and
25 importantly, the decisions, if any, made in respect of

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1 I respectfully ask you give them further consideration.

2 My Lady, thank you for your time.

3 **LADY HALLETT:** Thank you very much indeed.

4 Right, now Ms Henke King's Counsel for the
5 Welsh Government.

6 **Submissions on behalf of the Welsh Government by MS HENKE**

7 **MS HENKE:** My Lady, I'm behind the pillar, I don't think you
8 have a direct line of sight, but I am here and I can see
9 you on a screen.

10 **LADY HALLETT:** Okay.

11 **MS HENKE:** My Lady, prynhawn da, good afternoon. These are
12 the brief oral submissions on behalf of the
13 Welsh Government.

14 My Lady, the Welsh Government reaffirms its
15 commitment to this Inquiry. It intends to fulfil that
16 commitment. The Welsh Government wants to reassure
17 the Inquiry and the core participants that we wish to
18 work collaboratively with the Inquiry providing the
19 disclosure, the evidence and the information requested
20 of us. We have heard what has been said by the Bereaved
21 Families for Justice Cymru about our participation in
22 Module 1. The Welsh Government wish to reassure
23 the Inquiry and the families of the bereaved that we are
24 working with the Inquiry and will continue to work with
25 the Inquiry to provide such evidence as is required to

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1 the support services provided to survivors of domestic
2 abuse while being unable to leave their homes.

3 It may transpire that these units were not in fact
4 consulted at all in decisions relating to women and
5 girls, and that itself will be relevant, but we will
6 only know this if Rule 9 requests are made of them.

7 My second point relates to expert evidence.
8 My Lady, in respect of the experts on inequality set out
9 by Mr Keith King's Counsel this morning, we welcome the
10 proposed expert evidence from Professor James Nazroo,
11 Tom Shakespeare, Professor Nick Watson and Clare Wenham.
12 However, none of these experts are able to give evidence
13 on violence towards women and girls, or the
14 discrimination and inequality faced by them aside from
15 the important issues relating to intersectionality. We
16 therefore submit that consideration should be given to
17 an expert who is able to address issues specifically
18 relating to violence towards women and girls in addition
19 to the discrimination faced by women, and in particular
20 to ethnic and minority women.

21 In short, my Lady, expert evidence on inequalities
22 faced by women and girls goes beyond health
23 inequalities.

24 My Lady, you already have in writing our
25 recommendations and suggestions on experts and

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1 enable there to be a full and comprehensive Inquiry.

2 My Lady, the Welsh Government agrees with the
3 submission on behalf of the TUC that the Inquiry will be
4 enriched by a broad range of perspectives from a broad
5 range of witnesses. We support the inclusion of a broad
6 range of perspectives across both Module 2 and
7 Module 2B, the Welsh module.

8 The Welsh Government is grateful that the Inquiry
9 intends to provide further detail about the relationship
10 and interrelationship between Modules 2, 2A, 2B and 2C.
11 The Welsh Government is conscious that at the moment the
12 majority of the Welsh Government's evidence on
13 intergovernmental working is set out as part of
14 Module 2B and we welcome the indication that there will
15 be appropriate cross-module disclosure.

16 My Lady will know that the Welsh Government has not
17 been party to any discussions that may have taken place
18 between the Inquiry and the UK Government on the issue
19 of collective responsibility. We wish to emphasise that
20 non-disclosure on the grounds of collective
21 responsibility is not something upon which the
22 Welsh Government wish to make substantive submission,
23 nor is it likely to be an issue that we will raise in
24 this Inquiry.

25 The Welsh Government is grateful for the update

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1 provided by Counsel to the Inquiry on the release of
2 information by the Cabinet Office relating to
3 communication between the Chancellor of the Duchy of
4 Lancaster and the devolved governments. We look forward
5 to seeing such material as the Chair considers
6 appropriate to share with us and the other
7 core participants.

8 My Lady, in relation to issues of disclosure of
9 WhatsApp messages, diaries and the like, the
10 Welsh Government intends to fulfil all such requests
11 made of it by this Inquiry without any prior redaction
12 by us. We understand the duty of candour and we intend
13 to be transparent.

14 My Lady, is there any issue with which I can assist
15 the Inquiry today?

16 **LADY HALLETT:** No, thank you very much indeed, but I think
17 I will pursue the point about having someone speak who
18 is here when I can't see them. It's like having
19 a disembodied voice ...

20 So thank you very much indeed.

21 **MS HENKE:** My Lady, I'm grateful, thank you.

22 **LADY HALLETT:** Right, and the next, I hope, Ms Drysdale,
23 you're not behind a pillar, are you?

24 **MS DRYSDALE:** Good afternoon, my Lady.
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1 In this context, my Lady, this brings me to my
2 second point, that the Scottish Government wish to
3 stress the seriousness of their commitment to full
4 co-operation with the Inquiry.

5 Given that the Inquiry is to take a trauma-informed
6 approach, the Scottish Government wishes to emphasise
7 its intention to work collaboratively with the Inquiry
8 team.

9 We are grateful to Counsel to the Inquiry for
10 establishing good communication with ourselves and to
11 the cordial, respectful and prompt communication of the
12 Solicitor to the Inquiry for Module 2 with the legal
13 team for the Scottish Government.

14 Turning to my third point, my Lady, the co-operation
15 and engagement of the Scottish Government with
16 the Inquiry, the Scottish Government understands the
17 importance of disclosure to the Inquiry and its full
18 engagement with this aspect of the Inquiry. It has been
19 co-operating fully with the process of disclosure and
20 extensive documentation has been produced, over
21 9,000 documents already having been disclosed by the
22 Scottish Government.

23 Turning to the issue of further evidence provided by
24 the Scottish Government, my Lady, the
25 Scottish Government welcomes and supports the approach

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1 **Submissions on behalf of Scottish Ministers by MS DRYSDALE**

2 **MS DRYSDALE:** Can you see and hear me, my Lady?

3 **LADY HALLETT:** I can, thank you very much.

4 **MS DRYSDALE:** My Lady, I appear on behalf of the
5 Scottish Government with my junior Kenneth McGuire.

6 I have six very brief points to make: firstly, on
7 acknowledgement of loss; secondly, the commitment by the
8 Scottish Government to the Inquiry; thirdly,
9 co-operation and engagement by the Scottish Government
10 with the Inquiry; fourthly, evidence provided by the
11 Scottish Government to date; fifthly, the relationship
12 between the modules; and sixthly, assistance by the
13 Scottish Government.

14 So, my Lady, turning to the first of my points, the
15 Scottish Government wish to acknowledge the scale of the
16 loss and suffering of those in Scotland and the rest of
17 the United Kingdom during the pandemic. In particular,
18 they welcome the update on the listening exercise, Every
19 Story Matters, and on commemoration by Mr Keith KC.

20 The Scottish Government recognise the central
21 importance of the bereaved and all those affected by the
22 pandemic to the Inquiry process, the importance of
23 ensuring that their stories are heard and the importance
24 that they receive answers to their questions in relation
25 to the pandemic.

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1 of the Inquiry to obtaining evidence from witnesses.
2 All requests for statements under Rule 9 have been met.
3 Eight corporate statements have been produced and one
4 personal statement, and the Scottish Government has
5 respected all deadlines and complied with all requests
6 to provide documentation where it holds that, and it
7 will continue to do so.

8 Turning to the issue of the relationship between the
9 modules, the Scottish Government notes that the
10 Welsh Government seek clarification on the relationship
11 and interrelationship between the different Modules 2,
12 2A, 2B and 2C, and the Scottish Government welcomes the
13 update by Mr Keith KC on how cross-module disclosure
14 will be made and it would also appreciate further
15 clarification in due course of the precise parameters of
16 Module 2 and how that will interact with Module 2A.

17 Finally, my Lady, on the issue of assistance to
18 the Inquiry by the Scottish Government, the
19 Scottish Government wishes to emphasise that it will
20 assist the Inquiry to ensure that investigations are
21 conducted as comprehensively as possible in the time
22 available. It will assist the Inquiry in its aim of
23 identifying recommendations to support appropriate and
24 effective decision-making in the event of a future
25 pandemic, and to answer questions for the bereaved and

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1 for all those affected by the pandemic.

2 My Lady, these are the submissions for the
3 Scottish Government.

4 **LADY HALLETT:** Thank you very much indeed, Ms Drysdale.

5 Right, I think the last person to speak -- unless
6 Mr Keith wishes to say anything by way of reply -- is
7 Mr Chapman.

8 Not the most popular brief today, Mr Chapman,
9 I think, acting for the Cabinet Office.

10 **Submissions on behalf of the Association of Directors of the
11 Cabinet Office by MR CHAPMAN**

12 **MR CHAPMAN:** My Lady, it's always my pleasure to represent
13 the Cabinet Office.

14 For the purposes of today's hearing, I intend to
15 focus on the following five areas: the provision of
16 WhatsApp messages; the provision of Google Spaces
17 messages; provision of records of calls with the
18 devolved administrations; Cabinet collective
19 responsibility; and matters relating to the former
20 Prime Minister Boris Johnson.

21 So if I can take those in turn, starting with
22 WhatsApp messages.

23 As you know, my Lady, the Cabinet Office has been
24 supporting a large number of witnesses to whom
25 the Inquiry has made requests for information. To date,
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1 The Cabinet Office will continue to keep
2 the Inquiry's legal team updated as to its progress with
3 this work, and it will provide the Inquiry with
4 a further detailed update addressing the position on
5 a witness by witness basis next week.

6 On Google Spaces, my Lady, in January 2023 the
7 Cabinet Office identified the use of Google Spaces as
8 a method of communication within some Cabinet Office
9 business units. The Cabinet Office has identified
10 a total of 49 Google Space groups in which at least one
11 Cabinet Office Module 2 witness actively participated.

12 As has been requested, the Cabinet Office has
13 provided the Inquiry with details of the participants
14 and date ranges for each of these groups and, at the
15 Inquiry's request, is prioritising its review of certain
16 groups according to an agreed timetable.

17 Turning to calls with devolved administrations.

18 At the end of last week the Cabinet Office provided
19 the records sought by the Inquiry in an unredacted
20 format. As DLUHC -- the Department for Levelling Up,
21 Housing and Communities -- is the responsible department
22 now for these documents and related issues, the Inquiry
23 has agreed to direct any follow-up questions to DLUHC
24 rather than the Cabinet Office.

25 Can I turn to the issue of Cabinet collective
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1 it has provided 21 individual witness statements in
2 Module 2, with a substantial body of accompanying
3 disclosure.

4 The Inquiry's Rule 9 requests for evidence to
5 witnesses in Module 2 have included a request for
6 disclosure of WhatsApp and other messages about the
7 UK Government's response to Covid-19. The
8 Cabinet Office has been assisting the witnesses it is
9 supporting to provide all such messages.

10 Despite extensive dialogue and all best endeavours
11 to reach agreement, there has emerged a regrettable but
12 genuine difference in legal opinion between the Inquiry
13 and the Cabinet Office as to whether it's necessary to
14 provide messages which are unambiguously irrelevant to
15 the Inquiry's work. For today's purposes, it would be
16 inappropriate for me to do anything more than
17 acknowledge that difference and to note that it will be
18 resolved elsewhere.

19 In the meantime, and notwithstanding that legal
20 difference, the Cabinet Office continues to work
21 extremely hard and at pace to assist witnesses to
22 disclose all WhatsApp messages which are not
23 unambiguously irrelevant to the Inquiry's work.

24 Well over 1,000 pages of messages have been provided
25 to the Inquiry, with more to follow shortly.
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1 responsibility.

2 In establishing this Inquiry, the government
3 recognised the unprecedented and wholly exceptional
4 circumstances of the pandemic and the importance of
5 examining as rigorously as possible the actions the
6 state took in response in order to learn all possible
7 lessons for the future.

8 The government is not currently withholding any
9 information from the Inquiry on the basis of Cabinet
10 collective responsibility and, given the purpose of this
11 Inquiry, the government does not expect to seek any
12 redactions to relevant information due to be disclosed
13 to core participants.

14 **LADY HALLETT:** Sorry, can I just check: does that mean at
15 any stage of the Inquiry?

16 **MR CHAPMAN:** Throughout the life of the Inquiry, yes.

17 **LADY HALLETT:** Thank you.

18 **MR CHAPMAN:** It has regularly sought the Cabinet Office's
19 assistance in obtaining material from individual
20 witnesses, and the Cabinet Office has throughout sought
21 to facilitate that process.

22 It has recently obtained, very quickly reviewed and
23 now disclosed to the Inquiry Boris Johnson's notebooks,
24 following a review for national security sensitivities
25 and unambiguously irrelevant material.
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1 The Cabinet Office is of course aware that
2 Mr Johnson has recently indicated a willingness to
3 provide information directly to the Inquiry.

4 In relation to your team's suggestion that
5 Mr Johnson's notebooks should be returned to him in
6 full, the Cabinet Office is considering its position.

7 It's particularly cognisant of potential national
8 security issues and, in addition, it reserves its
9 position on whether unambiguously irrelevant material
10 should be provided to the Inquiry by any person in
11 advance of the resolution of the judicial review. It
12 recognises the urgency, and will of course keep
13 the Inquiry informed.

14 The Cabinet Office is also exploring options to
15 support Mr Johnson in gaining access to the material on
16 his old phone, and will contact him and his legal team
17 as a matter of urgency to agree suitable arrangements.

18 The Inquiry will naturally be kept informed of progress.

19 So, my Lady, those are the issues upon which
20 I propose to address you.

21 **LADY HALLETT:** Could I ask a couple of questions,
22 Mr Chapman, and if you can't answer them, please say so.

23 **MR CHAPMAN:** Yes.

24 **LADY HALLETT:** Your penultimate point: so the Cabinet Office
25 is in possession of Mr Johnson's notebooks, but because
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1 to consider its position, but it recognises the urgency
2 in doing so.

3 **LADY HALLETT:** Right.

4 Can you just explain a little more, Mr Chapman,
5 about the transfer of responsibility to -- I can never
6 pronounce these awful acronyms -- DLUHC? What has gone
7 to DLUHC?

8 **MR CHAPMAN:** Under a machinery of government change, earlier
9 or in fact last month, responsibility for devolved
10 administration issues and issues relating to the union
11 of the United Kingdom have been transferred from the
12 Cabinet Office to DLUHC, and with that ownership of the
13 documents, and it's for that reason that Cabinet Office
14 sought to facilitate and indeed itself disclosed the
15 documents that had been sought by the Inquiry in
16 relation to the calls with the devolved administrations.

17 As indicated, the Inquiry or your team will take any
18 further issues forward with DLUHC. They're now the
19 owner within government of the documents and related
20 issues.

21 **LADY HALLETT:** And this machinery of government change took
22 place, what, this year?

23 **MR CHAPMAN:** There have been two machinery of government
24 changes during the relevant period, the most recent one
25 being last month.
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1 of the point that's going to judicial review, even
2 though Mr Johnson himself says he would reveal them to
3 the Inquiry without redaction, the Cabinet Office is
4 going to apply redactions to somebody else's material?
5 Have I got that right?

6 **MR CHAPMAN:** My Lady, the position is that the
7 Cabinet Office is working out its position and it will
8 keep the Inquiry informed.

9 **LADY HALLETT:** I'm sure you'll alert them to the fact that,
10 as everyone's pointed out today, the pressures are
11 growing on all of us.

12 Can I ask what the position is in relation to the
13 old phone? As I understand it, Mr Johnson could have
14 just handed us the old phone, but neither the Inquiry
15 nor he has the ability to access the data, and so
16 Cabinet Office very kindly are stepping in -- and
17 of course they have the national security issues to
18 consider, which I totally understand -- but do I take it
19 from what you said in the penultimate point, is there
20 going to be any question of redacting whatever we find
21 on the old phone, until the Cabinet Office has resolved
22 its position?

23 **MR CHAPMAN:** My Lady, it's the same answer, that the
24 Cabinet Office -- these issues have very recently been
25 brought to the Cabinet Office's attention and it wants
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1 **LADY HALLETT:** Well, at some stage I may wish to go into
2 whether that's caused any delay or the purpose of it.
3 Somebody will know if they've ever read anything I've
4 written by way of judgments or rulings. I do sometimes
5 object to change for change's sake, or for other
6 reasons.

7 Okay, thank you, Mr Chapman, those are all the
8 questions I will ask at this stage.

9 Please do convey the message -- I know you will --
10 that we really are all of us under pressure and the more
11 delay there is, the greater the pressure on everybody,
12 and that includes not only the Inquiry team and me, but
13 all the representatives for the core participants and
14 those they represent.

15 **MR CHAPMAN:** My Lady, that message is well understood by
16 those instructing me. The Cabinet Office is itself
17 extremely eager to do everything it can to ensure that
18 the timetable does not slip.

19 **LADY HALLETT:** Thank you very much, Mr Chapman.
20 Mr Keith.

21 **Reply statement by LEAD COUNSEL TO THE INQUIRY**

22 **MR KEITH:** My Lady, may I briefly attempt to sweep up those
23 issues which, in our submission, require to be responded
24 to and can usefully be dealt with straightaway.

25 In relation to the application for the Inquiry to
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1 disclose the Rule 9 requests that it has made to the
2 myriad number of recipients, I repeat the submissions
3 that I made earlier, and I would simply observe this in
4 addition: in addition to there being no basis in law or
5 past practice to the disclosure of the Rule 9 requests,
6 it would simply serve no purpose at all in the
7 particular context of this module, because of course the
8 core participants are beginning to receive the documents
9 generated by those very same Rule 9 requests already.

10 The concern expressed by the core participants,
11 which we readily understand, is that there is fear on
12 their part that we are not sufficiently keeping the
13 corporate feet of the material providers to the fire in
14 relation to their response to those Rule 9 requests,
15 that they are not giving us what we seek, and that
16 they're not sufficiently and appropriately responding.

17 As I've said earlier in my oral submissions,
18 confidence can be placed in the Inquiry because it is
19 absolutely obvious that we are keeping their corporate
20 feet to the fire. All the issues that I've brought to
21 your attention this morning are all concerned with the
22 number of ways in which we have ensured that we obtain
23 what we wish from the material providers, and so there
24 really is no practical purpose to be gained in
25 disclosing the original Rule 9s now from some time ago.

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1 Module 2 is looking at the extent to which the
2 decision-makers bore that responsibility in mind, and
3 of course witnesses will be asked to what extent they
4 considered long Covid and, if they did not consider it,
5 why they did not.

6 Indeed, the questions that Mr Metzger posed are
7 paradigm examples of the sorts of questions which will
8 inevitably be put to the witnesses in Module 2. But the
9 medical and epidemiological examination of long Covid is
10 not something for Module 2. That is something which
11 will deserve and receive its own scrutiny in the context
12 of Module 3 and healthcare.

13 My Lady, in relation to the submissions concerning
14 the capturing of the testimony of children and young
15 people for the purposes of Every Story Matters, my Lady,
16 without piercing the veil of communications between
17 yourself and your team overmuch, I can say that I know
18 that you have directed that to be rapidly looked at, to
19 be considered straightaway, and you have repeatedly
20 expressed your wish that such testimony can be, to use
21 the phrase, captured and brought to the attention of
22 the Inquiry as you proceed through the modules. So that
23 is very much a matter in hand.

24 My Lady, in relation to the submissions from FEMHO,
25 firstly a request was made for disclosure of the draft

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1 In relation to the submissions from Bereaved
2 Families for Justice Cymru, an issue was raised about
3 whether or not it would be possible to save annotations
4 on the electronic transcription system. The answer to
5 that is: yes, it will be possible, it's just not
6 possible today, but it will be possible for the full
7 hearings.

8 Submissions were advanced as to the extent to which
9 WhatsApps have been requested of the Welsh Government
10 Rule 9 recipients. We are concerned of course today
11 with Module 2, and in relation to Module 2 we have
12 sought WhatsApps relating to Mr Drakeford, who is the
13 only minister in relation to whom we've issued a Rule 9
14 in Module 2. But of course there is much more extensive
15 Welsh evidence expected for the purposes of Module 2B.

16 My Lady, you were addressed by Mr Metzger, on behalf
17 of the Long Covid groups, in relation to the extent to
18 which long Covid would be an issue in Module 2.
19 My Lady, he expressed the serious disappointment of his
20 clients and indeed his own disappointment that Module 2
21 would not be looking at long Covid.

22 My Lady, I can absolutely assure him we are looking
23 at long Covid in the context of Module 2. Long Covid is
24 an injury, a serious condition, even a serious morbidity
25 which is the result of having had Covid.

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1 instructions to the experts. My Lady, the
2 core participants have ample opportunity to comment on
3 the first drafts of the actual expert reports. So, to
4 the extents that the drafts may not cover areas or
5 issues that they would wish to see covered, they are
6 given a full opportunity at that stage to ask the
7 Inquiry team to go back to the experts to cover those
8 additional areas, so little purpose would be gained in
9 disclosing the original draft instructions.

10 In relation to Southall Black Sisters and the
11 submissions relating to the additional Rule 9s, we will
12 consider what has been said. There is obviously
13 an issue concerning the extent to which we are able, in
14 the confines of Module 2, to look at domestic abuse and
15 the extent to which the government bore that in mind
16 when making relevant decisions on lockdowns, but that is
17 something which I think we will need to enquire into
18 further.

19 My Lady, finally in relation to Mr Chapman's
20 submissions, I'm afraid, in our respectful submission,
21 his position will not do.

22 We are under very severe constraints of time, as you
23 have observed, and we are now of course actively engaged
24 in litigation against the Cabinet Office in the
25 High Court.

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1 They have had ample time to make their position
 2 plain, and I would invite you to order that by the end
 3 of this week, given the amount of correspondence which
 4 has gone to and fro already, the Cabinet Office formally
 5 indicates what its position is in relation to
 6 unrestricted -- that's to say unredacted -- access to
 7 the notebooks belonging to Mr Johnson which it currently
 8 possesses and which it intends to return to him;
 9 secondly, what its position is in relation to the return
 10 to Mr Johnson of his dairies, which Mr Johnson has
 11 indicated we may of course examine on an unredacted
 12 basis; and, thirdly, by the end of the week, what their
 13 position is in relation to our non-national security
 14 unrestricted unredacted access to the phone.

15 I'm afraid experience has shown that the
 16 Cabinet Office's position on all these matters is not
 17 altogether clear, and we would be very grateful for
 18 a formal direction to that effect.

19 In relation to the WhatsApps -- that is to say the
 20 WhatsApps relating to the many other witnesses who are
 21 looked after by the Cabinet Office and who have received
 22 Rule 9 requests -- we would be grateful for a schedule,
 23 by the end of this week, of all the WhatsApp groups and
 24 threads relating to the witnesses looked after by the
 25 Cabinet Office, in relation to whom they have received

1 So thank you all very much. The next time I think
 2 the Inquiry team meets core participants will be when we
 3 start hearing evidence next week.

4 Thank you all.

5 (4.16 pm)

(The hearing adjourned)

1 Rule 9 requests now some time ago.

2 **LADY HALLETT:** Before I make that order, Mr Chapman, I'll
 3 give you an opportunity to make any submissions. There
 4 were four matters there, I don't know if you had
 5 a chance to ...

6 **MR CHAPMAN:** No submissions to make. Thank you.

7 **LADY HALLETT:** Very well.

8 Mr Keith, I make the directions that you seek, that
 9 I want those matters by the end of the week from the
 10 Cabinet Office.

11 **MR KEITH:** Thank you.

12 **LADY HALLETT:** Anything further?

13 **MR KEITH:** No, thank you, my Lady.

14 **LADY HALLETT:** Very well, that brings us to the end of
 15 today's proceedings.

16 I'm very grateful to everybody who's attended here
 17 in person and followed our proceedings, and also those
 18 who have been following online. I hope that we managed
 19 to allay some concerns, although I'm very conscious that
 20 there are concerns that remain.

21 I repeat an undertaking I have given before, but
 22 I'll do my very best to address those concerns and where
 23 possible resolve any issues. I can't always promise to
 24 do what everybody wants me to do, but I'll do my very
 25 best within the constraints upon me.

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