



**NOTICE OF DETERMINATION**  
**CORE PARTICIPANT APPLICATION**  
**MODULE 4 - GROUP OF MEMBERS AND FORMER MEMBERS OF HM ARMED FORCES**  
**SUFFERING ADVERSE REACTIONS FOLLOWING THE COVID-19 VACCINATION**

**Introduction**

1. In my [Opening Statement](#) on 21 July 2022, I explained that Modules would be announced and opened in sequence, with those wishing to take a formal role in the Inquiry invited to apply to become Core Participants for each module. On 5 June 2023, the Inquiry opened Module 4 and invited anyone who wished to be considered as a Core Participant to that Module to submit an application in writing to the Solicitor to the Inquiry by 30 June 2023.
2. The Inquiry has published the [Provisional Outline of Scope](#) for Module 4, which states that this module will consider a range of issues relating to the development of Covid-19 vaccines and the implementation of the vaccine rollout programme in England, Wales, Scotland and Northern Ireland. Issues relating to the treatment of Covid-19 through both existing and new medications will be examined in parallel. Further modules will be announced and opened in due course, to address other aspects of the Inquiry's Terms of Reference.
3. On 26 June 2023 the Inquiry received an application from the group of members and former members of HM Armed Forces suffering adverse reactions following the Covid-19 vaccination ("the Applicant") for Core Participant status in Module 4.
4. I made a provisional decision not to designate the Applicant as a Core Participant in Module 4, thereby declining the Applicant's application ("the Provisional Decision"), on 17 July 2023. The Applicant was provided with an opportunity to renew the application in writing by 4pm on 24 July 2023.

5. On 21 July 2023, the Applicant submitted a renewed application for Core Participant status in Module 4. This notice sets out my determination of the Applicant's application for Core Participant status in Module 4.

## **Application**

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

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

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

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

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

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

7. In accordance with the approach set out in my Opening Statement and the Inquiry's [Core Participant Protocol](#), I have considered whether the application fulfils the requirements set out in Rule 5(2) in relation to the issues set out in the Provisional Outline of Scope for Module 4.

## **Summary of Application**

8. In its original application, the Applicant explained that it was a group consisting of those with a British military background who suffered an adverse reaction after provision of a Covid-19 vaccine. The Applicant noted that members of the military underwent vaccination compulsorily and at an early stage of the vaccination programme. The application stated that there were reports of an increased risk of serious adverse reaction among members of the military. The application was put on

the basis that both the direct and significant role criteria (Rule 5(2)(a)) and the significant interest criteria (Rule 5(2)(b)) were met. The Applicant also pointed to other considerations it said were relevant, including that the military are an important and often underrepresented group in UK society, and that the Applicant was entitled to an additional layer of protection through the Armed Forces Covenant.

9. In its renewed application, the Applicant states that its interests cannot be represented by another Core Participant group, identified as “Vaccine Injured and Bereaved Groups”, because this group does not deal with or represent any members of HM Armed Forces. It is said that the Applicant arguably has a greater interest in Module 4 than this other group, because those whom the Applicant represents have different physical, ethnic and other traits to the wider civil community. The Applicant states that it does not intend to make submissions on wider issues relating to health outcomes of the general population and there will therefore not be a duplication of work if it is granted Core Participant status.
10. The Applicant, in its renewed application, explains its concern that if, during disclosure, it is discovered that members of the armed forces were known to have an adverse reaction to vaccines but, due to operational reasons continued to be required to have vaccinations, this would be an issue that could only be addressed by having a Core Participant group reflective of the armed forces. The application further states that it would be unfortunate if the group’s concerns around vaccine safety were dismissed in a similar fashion to concerns around Gulf War Syndrome.

### **Decision for the Applicant**

11. I have considered with great care everything that is said in the Applicant’s renewed application. I have also reminded myself of what was said in the original application to enable me to assess the merits of the application as a whole. Having done so, in my discretion, I have decided not to grant the Applicant Core Participant status in Module 4 of the Inquiry.
12. Members of the armed forces no doubt played an important role in responding to the pandemic and the Applicant clearly has a deep and genuine concern for the issues set out in the application and renewed application. However, I am satisfied that the

Applicant did not play a direct or significant role in respect of the matters to be explored during Module 4 and Rule 5(2)(a) is therefore not satisfied. Additionally, while the Applicant clearly has an interest in Module 4 matters, in particular vaccine safety, I do not consider, having regard in particular to the need to manage the Inquiry effectively and efficiently, that the interest is sufficiently significant as to grant the Applicant Core Participant status. Rule 5(2)(b) is therefore not satisfied.

13. While I am bound to consider the factors set out in Rule 5(2), it is also open to me to take into account other relevant factors. I am not obliged to designate any particular person or organisation as a Core Participant. I am determined to run the Inquiry as thoroughly and as efficiently as possible, bearing in mind the Inquiry's wide-ranging terms of reference and the need for the Inquiry process to be rigorous and fair. Given the vast numbers of people who were involved with, or adversely affected by, the Covid-19 pandemic, very many people and organisations in this country could potentially have an interest in the Inquiry. It would not be practicable to grant Core Participant status to every such individual or body.
14. I have given careful consideration to the other matters raised by the Applicant which concern the position of the military. However, I am not persuaded that these matters merit designation as a Core Participant in Module 4. In particular, I do not accept that any issues arising in respect of the safety of vaccinations provided to members of the armed forces could only be addressed if the Applicant was a Core Participant.
15. The Applicant refers to the fact that my provisional decision stated that I intended to grant Core Participant status to organised groups representing the interests of those who may have suffered damage as a result of a Covid-19 vaccine, and that it may be possible for the Applicant's interests to be represented by such a group. For the avoidance of doubt, my provisional decision was not made on the basis that such a group does or could represent the Applicant's interests. Rather, the fact that I intended to grant Core Participant status to such a group was highlighted in case the Applicant wished to explore joining them. I consider that the groups that have been granted Core Participant status in Module 4 are better placed than the Applicant to assist the Inquiry in achieving its aim of representing the collective interests of a broad spectrum of those affected.

16. It is not necessary for an individual or organisation to be a Core Participant in order to provide evidence to the Inquiry. the Applicant may have relevant information to give in relation to matters being examined in the Inquiry and the Inquiry will be reaching out in due course to a range of individuals, organisations and bodies to seek information, to gain their perspective on the issues raised in the modules and, where appropriate, to ask for witness statements and documents.
17. Further, I will listen to and consider carefully the experiences of those affected by the vaccines through the listening exercise. I made clear in my Opening Statement that this listening exercise is a significant and important part of the work of the Inquiry. It will generate reports that will be fed into the hearings and inform the Inquiry's work.
18. For all of these reasons, having considered all of the information provided by the Applicant, and in light of the Provisional Outline of Scope for Module 4, I consider that the Applicant did not play a direct and significant role in relation to the matters to be investigated in Module 4. Nor does the Applicant have a significant interest in an important aspect of the matters to which Module 4 relates. Taking into account all relevant considerations, I have decided that the Applicant should not be designated as a Core Participant in Module 4 and I confirm that this is my final decision.
19. I will keep the scope of Module 4 under review. My decision not to designate the Applicant as a Core Participant in Module 4 does not preclude it from making any further applications in respect of later modules. I will consider any future applications the Applicant may wish to make on their merits at the time they are made.

**Rt Hon Baroness Heather Hallett DBE**  
**Chair of the UK Covid-19 Inquiry**  
**4 August 2023**