

**IN THE UK COVID-19 PUBLIC INQUIRY
BEFORE BARONESS HEATHER HALLETT**

IN THE MATTER OF:

**MODULE 3 OF THE PUBLIC INQUIRY TO EXAMINE THE COVID-19
PANDEMIC IN THE UK**

**WRITTEN SUBMISSIONS ON BEHALF OF THE
WELSH AMBULANCE SERVICE NHS TRUST
IN RESPECT OF THE SECOND PRELIMINARY HEARING
OF MODULE 3 ON 27 SEPTEMBER 2023**

Introduction

1. These submissions are made on behalf of the Welsh Ambulance Service NHS Trust (WAST), a Core Participant (CP) in this Inquiry. Over the relevant period, WAST was the sole national provider of 999 Emergency Medical Services (“EMS”) in Wales; provided the call handling and clinical assessment and advice functions of the NHS Wales 111 telephone service; and provided a non-emergency patient transport service (“NEPTS”).
2. WAST reaffirms its commitment to assisting the Inquiry with its important task. In response to the items identified on the agenda for the hearing on 27 September 2023 WAST says as follows:-

Rule 9 requests

3. WAST received a Rule 9 request in relation to Module 3 on 3 April 2023. WAST apologises to the Inquiry for not yet having been able to provide a detailed response to that Rule 9 request, a matter that has been out of the Trust’s control as a result of the ill health of instructed counsel who had conducted the relevant interviews with the Trust’s senior executives.

4. WAST has kept the Inquiry updated as to the particular and unusual problems it has regrettably encountered as a consequence of a significant illness suffered by a senior member of its team of counsel.
5. Most recently, by letter to the Inquiry dated 8 September 2023, WAST has requested an extension of time until 10 November 2023 for filing its Rule 9 response. WAST's Rule 9 response is currently due by 25 September 2023; however, as a result of the Trust having to instruct a new team of counsel due to the issues outlined above, it is not going to be possible to file a detailed response by that date.
6. WAST hopes that its request for the above extension of time will be granted before the second preliminary hearing on 27 September 2023. In the event that the request has not been granted before that hearing (and even if it has been), the Inquiry is requested not to refer at the hearing to the delay given that it is outside the Trust's control, or the confidential health issues experienced by a senior member of WAST's team of counsel.

Disclosure to Core Participants – the email deletion issue

7. The Inquiry has already been notified of this issue by DHCW. Put shortly, despite being based in Wales, WAST does not believe that it has been affected by the identified email deletion issue. This was explained in full in a letter dated 1 September 2023 to the Inquiry. No WAST email accounts of the relevant categories of individuals have been deleted.

Disclosure to Core Participants (Relativity)

8. WAST looks forward to being able to access Relativity for the purpose of seeing documents disclosed in this module.

Expert witnesses

9. WAST notes Counsel to the Inquiry's submissions as to expert witnesses and has no observations to make at this stage.

Non-Covid conditions to be examined

10. WAST notes the four areas which have been identified for closer examination by the Inquiry and has no observations to make at this stage.

Provisional List of Issues

11. WAST is grateful to the Inquiry for its identification of the provisional list of issues and has no observations to make at this stage in relation to that list pending sight of the submissions of other CPs.

Every Story Matters

12. WAST has noted the update provided by the Inquiry on 28 July 2023.

Public Hearings

13. WAST notes the anticipated hearing dates from Autumn 2024 for a period of 10 weeks and agrees that a further preliminary hearing in mid-2024 would be prudent.

RICHARD BOOTH KC

12th September 2023

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Temple, EC4**

(Instructed by Gemma Cooper, Solicitor of NWSSP Legal & Risk Services)