

Thursday, 26 October 2023

(10.30 am)

LADY HALLETT: Good morning, everyone.

This is the third preliminary hearing into Module 2A, key decision-making in Scotland, and Mr Jamie Dawson King's Counsel will now set out for me any progress that has been made in relation to the hearings that start in January 2024, and any problems that we have encountered.

Mr Dawson.

Statement by LEAD COUNSEL TO THE INQUIRY FOR MODULE 2A

MR DAWSON: Good morning, my Lady.

As you have indicated, I am Jamie Dawson KC, Lead Counsel to the Inquiry on Module 2A. I appear this morning along with my learned junior, Bethany Condron of the English Bar, one of the team of junior counsel working with me on the investigations in and preparation of Module 2A.

Those who are listening will recall that Module 2A relates to the core political and administrative decision-making of government in Scotland and in its management of the Covid-19 pandemic, with a focus on the key decisions made by the Scottish Government.

This, as you have said, my Lady, is the third preliminary hearing in this module. The first and

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the National Police Chiefs' Council.

Ms Olivia Smith appears on behalf of the Scottish women's rights organisations in person, who have been granted core participant status since the last preliminary hearing in March 2023.

Mr Simon Bowie appears remotely on behalf of Public Health Scotland.

Ms Una Doherty KC appears on behalf of NHS National Services Scotland, and is also remote.

The other core participants in this module who are not appearing at this hearing are the Trades Union Congress and the Scottish Trades Union Congress, who have joint core participant status, and Scottish Care.

The current plan for the hearing, my Lady, is that Ms Mitchell KC will address you later on behalf of Scottish Covid Bereaved and Mr Mitchell KC will address you on behalf of the Scottish Ministers. It may be that I will be able to add something further after they have spoken.

My role today is to provide an update for core participants and for the public on the work of Module 2A, and to outline our thinking for the module as we move forward to the evidential hearings, which are due to take place early next year, commencing on 16 January 2024 for a period of three weeks.

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second preliminary hearings in Module 2A took place on 1 November 2022 and 21 March 2023 respectively. This will be a hybrid hearing with some core participants appearing or participating remotely, and some in person here with us at Dorland House, the Inquiry's hearing centre in London.

The proceedings are streamed on YouTube to allow those members of the public with an interest in the work of the Inquiry to listen in.

There are now nine core participant groups in Module 2A, and all are legally represented. Before saying a little about their role and their involvement in the work of the module, may I introduce the core participants and their representatives, present either in person or remotely at this hearing.

Ms Claire Mitchell KC appears on behalf of Scottish Covid Bereaved, who have made a written submission. She appears remotely.

Mr Geoffrey Mitchell KC appears in person with us in London on behalf of the Scottish Ministers, who have also made a written submission.

Mr Daniel Friedman KC appears on behalf of Disability Rights UK and Inclusion Scotland. He is remote, and his clients have made a written submission.

Ms Genevieve Woods appears in person on behalf of

2

As intimated at the previous preliminary hearing of this module in March, the evidential hearings in Module 2A will take place in Edinburgh. Since that time, the Inquiry team has been researching suitable venues to allow it to live up to its commitment that its important work at those hearings be accessible to the Scottish public, in whose interest the hearings and the work of the module are being undertaken.

The hearings will take place in January 2024 at the Edinburgh International Conference Centre in Morrison Street. The hearing venue has been selected as a relatively accessible one, in central Edinburgh with good transport links, to facilitate the attendance of those who wish to be there in person to hear the proceedings. The venue has been used for other large events including public inquiries. Members of the Inquiry team have put in significant efforts to seek to ensure that this venue will allow the business of the Inquiry to be conducted effectively and respectfully and to replicate the nature of the space which has been used for the hearings in Modules 1 and 2 here at Dorland House, as far as possible. For those who cannot or do not wish to attend, the proceedings will be able to be watched online.

In order to set out the work which the module has

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1 undertaken since the last preliminary hearing and our
 2 plans going forward to the evidential hearings in
 3 January, I intend to address the following areas.

4 One, core participants.

5 Two, an update on Rule 9 requests, statements and
 6 exhibits.

7 Three, the gathering of documentary evidence from
 8 the Scottish Government.

9 Four, documentary discovery and disclosure to
 10 core participants.

11 Five, the list of issues, plans for the hearings in
 12 January 2024, and the provisional list of witnesses.

13 Six, expert witnesses.

14 Seven, Every Story Matters, commemoration and
 15 the impact film.

16 Eight, update on co-operation with the Scottish
 17 Covid Inquiry.

18 Finally, nine, some concluding remarks.

19 So the first item on my list is core participants.

20 The now nine core participant groups in the module
 21 have been provided with regular updates on our progress
 22 since the last preliminary hearing in March. This has
 23 been provided in the form of a detailed written account
 24 of progress which has been made in the module by way of
 25 investigation. In accordance with our usual practice at

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1 continue the process of core participant engagement in
 2 the module. Core participants have been allowed to
 3 suggest broad areas or matters which they wish
 4 the hearings to cover, falling within the scope of
 5 the module, into which they will have more detailed
 6 opportunity to contribute as the hearings approach,
 7 a matter to which I will return.

8 So far, such meetings have taken place with five of
 9 the nine core participant groups. The offer remains
 10 open for similar meetings to be undertaken for
 11 the benefit of the others.

12 Update on Rule 9 requests, statements and exhibits.

13 Those who are listening will recall that Rule 9
 14 requests are the means by which the Inquiry generally
 15 seeks evidence from organisations or individuals who
 16 have a contribution to make to the work of the module,
 17 either in the form of the production of documentary
 18 evidence and/or the provision of written testimony in
 19 the form of a statement to the Inquiry.

20 The Module 2A solicitor team circulated an update
 21 note to core participants on 9 October of this year,
 22 providing them with the details of the multiple Rule 9
 23 requests which have been sent out by the module, either
 24 as standalone requests relating only to matters to be
 25 covered in Module 2A or in conjunction with other

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1 preliminary hearings, in advance of this hearing
 2 the core participants received both a monthly update on
 3 the details of the progress in the work of the module,
 4 and a note prepared by me about matters which I intended
 5 to raise at the hearing itself.

6 They were all given the opportunity to submit
 7 written submissions, and to make oral contributions to
 8 the hearing today, if they wished to do so.

9 In addition, regular meetings have continued to take
 10 place between the Module 2A core participants and/or
 11 their representatives and members of the Module 2A
 12 solicitor team to supplement the information made
 13 available to them in the monthly regular updates issued
 14 by the Inquiry and to deal with matters more specific to
 15 each core participant.

16 Further, in order to promote core participant
 17 engagement in the preparation for the Module 2A
 18 hearings, meetings have been offered to
 19 the core participants which have been or will be
 20 attended by senior counsel instructed for Module 2A,
 21 namely me.

22 These meetings have been designed to allow
 23 information to be disseminated about the plans for
 24 the Module 2A hearings, in particular bespoke details
 25 relevant to any given core participant group, and to

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1 modules, in particular the other Module 2s, where
 2 the role and remit of a particular organisation merited
 3 it.

4 To this point, Module 2A has issued more than 140
 5 Rule 9 requests for evidence. These have included:
 6 66 requests to organisations which represent groups of
 7 Scottish society which have suffered a particular impact
 8 as a result of the Covid-19 pandemic, these have been
 9 analysed and used in formulating the Rule 9 questioning
 10 of those responsible for its management in Scotland,
 11 including Scottish Government ministers;
 12 16 questionnaires which were sent to members of
 13 the Scottish Government Covid-19 Advisory Group to
 14 ascertain their initial views on the important roles
 15 which they were asked to play in providing advice to
 16 government and the ultimate decisions taken by
 17 the Scottish Government in its management of
 18 the pandemic. These responses were also used as a basis
 19 for lines of questioning addressed to decision-makers in
 20 government and also as a starting point for detailed
 21 Rule 9 requests which have now also been sent to these
 22 important independent advisers to
 23 the Scottish Government.

24 As I set out at the last preliminary hearing in
 25 March, requests for corporate statements were made

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1 towards the end of 2022, to the numerous
 2 Scottish Government directorates, each of which had some
 3 role in the management of the pandemic in Scotland.
 4 The responses to these requests were received and
 5 analysed within the Inquiry. They were found generally
 6 to be of use in setting out responsibilities and
 7 structures, though were not as detailed as regards key
 8 decisions actually made by the Scottish Government.
 9 In order to balance the need to get statements finalised
 10 and disclosed to relevant parties, in particular
 11 core participants, these statements were signed and
 12 disclosed to core participants on 14 July of this year.

13 Feedback after analysis of them, put together by
 14 the Module 2A counsel team, form the basis of further
 15 Rule 9 requests for supplementary corporate statements
 16 from these directorates, which have now been compiled,
 17 along with a further statement from the strategy and
 18 external affairs directorate of the Scottish Government
 19 relating, amongst other things, to the work of
 20 the outbreak management directorate and the Covid
 21 co-ordination directorate, as well as the structure and
 22 activities of the Scottish Government's Resilience Room,
 23 insofar as it played a role in the management of the
 24 pandemic.

25 In addition, further Rule 9 requests have been

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1 provided assistance to the Scottish Inquiry,
 2 the Scottish Human Rights Commission and
 3 Justice Scotland have also been contacted and asked to
 4 provide statements and documents on matters relating to
 5 their roles and responsibilities.

6 These requests have sought both corporate statements
 7 from these organisations and also extensive
 8 documentation relating to the scope of Module 2A.

9 Additionally, Module 2A has, since the time of
 10 the last preliminary hearing, sent detailed Rule 9
 11 requests to a large number of individuals within these
 12 bodies. To date, a total of 103 requests have been sent
 13 to individuals. Amongst others, these requests have
 14 been issued to the key Scottish Government
 15 decision-makers at the time of the Covid-19 pandemic,
 16 including Nicola Sturgeon, John Swinney, Jeane Freeman,
 17 Humza Yousaf, Kate Forbes and other Cabinet Secretaries
 18 and ministers. These requests have also been issued to
 19 the key advisers to the Scottish Government at the time,
 20 including Catherine Calderwood, Gregor Smith,
 21 Jason Leitch and the members of the Scottish Government
 22 Covid-19 Advisory Group. Key civil servants have also
 23 received such requests.

24 There have been separate individual Rule 9 requests
 25 issued by Module 2A to UK Government ministers involved

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1 issued to the directorate of health and social care, in
 2 relation to the Scottish Government's role in
 3 the management of the pandemic in the care sector, and
 4 in connection with the numerous advisory groups beyond
 5 the Scottish Government Covid-19 Advisory Group, which
 6 provided assistance to the Scottish Government in its
 7 work on Covid-19. These statements are currently in
 8 the process of being finalised.

9 Further corporate requests have been sent to
 10 numerous organisations which had a role in
 11 the management of the pandemic in Scotland, including
 12 the Office of the Secretary of State for Scotland,
 13 significant NHS bodies including Public Health Scotland
 14 and NHS National Services Scotland,
 15 the Care Inspectorate, the Scottish Parliament Corporate
 16 Body, the Crown Office and Procurator Fiscal Service,
 17 Police Scotland, the Scottish Courts and Tribunal
 18 Service and COSLA. Other organisations with a relevant
 19 perspective to share on the core decisions taken in the
 20 management of the Covid-19 pandemic in Scotland,
 21 including the Royal Society of Edinburgh, the STUC,
 22 Scottish Care, Audit Scotland, the Children and Young
 23 People's Commissioner for Scotland, Uncover, an academic
 24 group within Edinburgh University set up to assimilate
 25 research and information about Covid-19, which has also

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1 in intergovernmental working with and in Scotland.
 2 Rule 9 requests have been sent to Michael Gove and
 3 Alister Jack. The draft statements of these key
 4 individuals have in large part been received and
 5 continue to come in. Their contents are being analysed
 6 by the Module 2A counsel team.

7 My Lady, you have set a tight timetable for this
 8 Inquiry. Module 2A is no exception to that rule.
 9 The timetable to which we are working requires to be
 10 consistently balanced against the scale of the matters
 11 which the module intends to address, their complexity
 12 and, self-evidently, their importance to the people of
 13 Scotland. Some of the evidence requests which have been
 14 sent to individuals comprised around 1,000 questions.
 15 All key decision-makers received Rule 9s with questions
 16 running into the hundreds. They were all drafted by
 17 counsel, who have worked extremely hard over many months
 18 to try to probe every corner of government
 19 decision-making about the management of the pandemic in
 20 Scotland. They were based, in part, on evidence with
 21 which the Inquiry has been provided by groups who were
 22 particularly affected by the pandemic and who drew to
 23 our attention in their impact statements issues which
 24 they considered ought to be addressed in the module and
 25 for which government decision-makers ought to be held to

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1 account.

2 The detail which they included attempted to get to
3 the nub of the key decisions and why they were made.
4 They attempted to uncover and probe weaknesses and
5 failures in government decision-making which, in due
6 course, we hope will inform your recommendations about
7 how things can work better in the future.

8 It has been spelled out clearly to those in receipt
9 of Rule 9 requests for written statements that timelines
10 require to be adhered to as well as the detail of
11 the requests respected, if your Ladyship's ambitious
12 plans for the module are to be met.

13 That timetable exists so that your Ladyship will be
14 able to report and make what recommendations you deem
15 appropriate on the evidence at a time not too far
16 removed from the events of the Covid-19 pandemic but
17 sufficiently close to them to be relevant, and as likely
18 to protect the people of Scotland from the threats of
19 future similar events as possible.

20 The requirement for speed must be respected but not
21 at the expense of reasonable thoroughness. The
22 Module 2A team have made clear to those in receipt of
23 the requests that the Inquiry expects the matters raised
24 in each request, though in many cases both numerous and
25 complex, to be answered fully. The Inquiry is grateful

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1 resolved.

2 Considerable efforts have been made on the part of
3 the Inquiry to reiterate what is expected of witnesses
4 and material providers. This included a requirement in
5 each request that the witness complete a table
6 indicating where each question had been answered in
7 the response. That system is designed to ensure that
8 care is taken by each respondent to answer each matter
9 put to him or her.

10 In the Scottish Government's submission for this
11 preliminary hearing, it is stated at paragraph 3 that
12 occasionally a Rule 9 request seeks information about
13 matters which are not within the knowledge or remit of
14 the witness, which prevents them from answering every
15 question in the Rule 9. For the sake of clarity, if
16 questions had been asked about elements of the scope of
17 the module in which a witness had no involvement, they
18 are of course perfectly entitled to say so and leave
19 those matters to be handled by more appropriately
20 qualified witnesses. We see no reason why this should
21 cause any significant delay.

22 Module 2A has already commenced the process of
23 having the Rule 9 responses from individuals signed in
24 order that they can be disclosed to core participants
25 without further delay. Where the Rule 9 responses do

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1 to those bodies and individuals who have engaged fully
2 with the requests we have issued and provided statements
3 and supporting documentation in accordance with those
4 requests.

5 Efforts are being made to ensure that signed
6 statements and their exhibits will be disclosed in time
7 for them to be reviewed by core participants ahead of
8 the oral hearings.

9 In the case of the senior Scottish Government
10 decision-makers, the requests that have been made have
11 required considerable work to be completed within
12 demanding timescales. The Inquiry acknowledges that
13 the Scottish Government directorates, the individuals
14 concerned and their legal teams have worked hard to
15 respond to these requests. The Inquiry is grateful for
16 their co-operation.

17 That said, the Inquiry has concerns about aspects of
18 this important part of the module's work. Given
19 the relatively short period of time remaining before
20 the substantive hearings in Module 2A commence, if
21 witness statements do not address all the matters raised
22 in the Rule 9 request and/or there are delays in meeting
23 the Rule 9 requests for documents and witness
24 statements, these difficulties will have the potential
25 to disrupt the Inquiry's process unless they are swiftly

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1 not, contrary to the clear instruction given to all
2 Rule 9 recipients in each request, address all of the
3 matters raised in the request, Module 2A may send
4 a supplemental Rule 9 request to the organisations or
5 individuals concerned on discrete matters in which
6 the witness or organisation is thought to have had
7 an involvement.

8 These will be processed, signed and disclosed
9 without delay. To the extent that the requirement to
10 address all questions in the request has not been met by
11 the witness, it may be necessary to explore the reasons
12 why there are unanswered matters at the hearings or at
13 a later stage.

14 Number three, the gathering of documentary evidence
15 from the Scottish Government.

16 As I indicated earlier, the requests issued to
17 corporations, which were sent out to the major material
18 providers who have the most prominent roles to play in
19 the work of the module, in particular the directorates
20 of the Scottish Government and Public Health Scotland,
21 were issued in late 2022. Along with requests for
22 written corporate statements, these organisations
23 received an invitation to exhibit to their statements
24 documentary material which supported the matters raised
25 in the response.

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1 In addition, disclosure of material generally
 2 relevant to the matters within the module's scope was
 3 sought and some specification of the types of documents
 4 sought was generally provided. The main component of
 5 the documentary material which has been recovered so far
 6 by Module 2A has come from the Scottish Government or
 7 its various directorates and individuals who worked
 8 within it as part of the Covid-19 response. These
 9 documents have been provided in response to the numerous
 10 corporate and individual Rule 9 requests which have been
 11 issued by or are relevant to the module and are
 12 additional to exhibits provided to statements. We refer
 13 to these as being part of the general disclosure.

14 I have a number of observations to make about
 15 the documentary recovery exercise of the general
 16 disclosure from the Scottish Government.

17 First of all, some general observations. Most of
 18 the general disclosure, as I've said, which has been
 19 requested by the module has now been received. The
 20 process of recovery has gone more slowly than expected,
 21 especially with the Scottish Government. This has no
 22 doubt, to an extent, been due to the considerable
 23 administrative burden which has been placed on
 24 the Scottish Government and its legal department by not
 25 only this Inquiry but also the Scottish Inquiry.

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1 ensure that there is simply no doubt whatsoever, any
 2 material that is asked for -- WhatsApp messages, emails,
 3 Signal messages, Telegram messages or whatever -- will
 4 absolutely be handed over to the Covid inquiries and
 5 handed over to them in full."

6 The Inquiry expects that what has ultimately been
 7 provided to us by the Scottish Government comprises
 8 the full disclosure which the First Minister promised
 9 would be provided. If it transpires that this is not
 10 the case, the Inquiry will wish to know why.

11 One thing the Scottish public can, in my submission,
 12 be assured about is that very considerable efforts have
 13 been made on the part of the Module 2A team to try to
 14 get access to the documents originally requested
 15 in 2022.

16 Those who have still to provide documents in
 17 connection with either corporate or individual Rule 9
 18 requests should be aware that these require to be
 19 produced as soon as possible. Though, to some,
 20 the Module 2A hearings may still seem some time away,
 21 the Inquiry needs to subject the documentary discovery
 22 to significant internal processing requirements which
 23 include an assessment of relevance, assessment in
 24 accordance with the Inquiry's protocol relating to
 25 redaction, various administrative steps, including

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1 However, there have been numerous misunderstandings on
 2 the Scottish Government's part about what the Inquiry
 3 considers to have been perfectly clear documentary
 4 requests. These have undoubtedly caused delays.

5 The consequence of the lengthy communications
 6 between the Module 2A team and the Scottish Government
 7 which have resulted is that certain pre-prescribed
 8 priority documents comprising Cabinet minutes and
 9 associated advice, similar minutes and advice relating
 10 to the work of the Scottish Covid-19 Advisory Group and
 11 the Scottish Government Resilience Room have been
 12 produced and are in the process of being analysed by
 13 the Module 2A counsel team.

14 In addition, a residual category of documents
 15 relating to core decisions, discussions and
 16 communication about them have also been requested and
 17 provided. These are currently being processed by
 18 the Inquiry team. The total of these two tranches of
 19 disclosure runs to thousands of documents.

20 We would remind core participants and those
 21 listening that on 29 June 2023 the First Minister of
 22 Scotland made the following commitment in response to
 23 questioning of him in the Scottish Parliament:

24 "It is important that I abide by the rules of the UK
 25 Public Inquiry and the Scottish Public Inquiry ... to

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1 the allocation of Inquiry numbers to exhibits, and
 2 the uploading of the documents to the Inquiry's
 3 Relativity system.

4 Further steps are required in accordance with
 5 the Inquiry's processes before documents can then be
 6 disclosed to core participants. The documents require
 7 also to be substantively reviewed to the extent that
 8 that is possible by the counsel team. Hence,
 9 the requirement for documents to be produced as soon as
 10 possible is now absolutely necessary.

11 Potentially relevant messages from WhatsApp and
 12 other informal messaging platforms.

13 You will be acutely aware, my Lady, that the issue
 14 and content of informal communications, in particular
 15 WhatsApp messages, has become a prominent part of
 16 the Inquiry's investigations into core decision-making
 17 by the UK Government in Module 2. Their potential
 18 importance to this module has been a point made on
 19 previous occasions by the module's core participants,
 20 not least Scottish Covid Bereaved. Those conducting
 21 the module's investigations have thus been aware for
 22 some time of the need to investigate the usage of such
 23 messages by those involved in the governmental response
 24 in Scotland.

25 We are very aware that messages sent by informal

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1 methods of communication between key decision-makers
 2 and/or their advisers discussing information, advice and
 3 the management of the pandemic in Scotland sent during
 4 the relevant period can provide important information
 5 about and context to the key decisions and issues which
 6 are to be addressed in Module 2A.

7 For the sake of clarity, the term "WhatsApps" is
 8 used by us as a term of convenience. What I have to say
 9 in this regard should be taken to encompass not only
 10 WhatsApp messages but all other informal means of
 11 communication which may have been used to communicate in
 12 relation to the core decisions made by
 13 the Scottish Government in connection with its Covid-19
 14 response, including but not limited to texts,
 15 Microsoft Teams and Signal messages. This wide
 16 definition has been adopted in requests for information
 17 and documents issued by the module.

18 As a result of the potential significance of
 19 informal messaging in the way that government business
 20 was conducted at Westminster and as urged by our
 21 core participants, we requested as part of our corporate
 22 request to the Scottish Government and other significant
 23 Scottish public bodies involved in the Covid-19
 24 response, including Public Health Scotland, that they
 25 provide us with details about the usage of informal

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1 decision-makers from within the Scottish Government now
 2 suggest that informal communications, such as WhatsApp
 3 messages, were used by key decision-makers to discuss
 4 matters around the progress of the pandemic in Scotland,
 5 to discuss advice received in relation to the pandemic,
 6 and to discuss the nature of the decisions that
 7 the Scottish Government might have to take.

8 I should be clear, my Lady, that, subject to one
 9 exception to which I will revert, at present
 10 the Scottish Government has provided the Inquiry with no
 11 WhatsApp or other informal messaging material, either in
 12 its own possession or in the possession of
 13 the individuals whose individual Rule 9 requests are
 14 being handled by the Scottish Government.

15 Some reliance appears to have been placed in
 16 the Scottish Government written submission to this
 17 hearing at paragraph 5 on the fact that it has very
 18 recently requested the disclosure of such material be
 19 required by the provision of a notice issued under
 20 section 21 of the Inquiries Act 2005, in order to
 21 address data protection concerns. For the sake of
 22 clarity, this was not a matter which was raised by
 23 the Scottish Government as an impediment to
 24 the production of any such messages until very recently,
 25 in fact on 5 October 2023, and so should not be taken as

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1 messages, including but not limited to WhatsApps, in
 2 the management of the pandemic in Scotland, but also to
 3 provide copies of the messages themselves.

4 For the avoidance of doubt, we sought information
 5 about the nature and extent of the use of such informal
 6 messaging, including the groups in which they were sent.
 7 To be clear, we sought not only messages in which
 8 decisions were communicated, but also messages in which
 9 matters relating to key government decision-making were
 10 raised in order that a full assessment of the basis upon
 11 which such decisions were arrived at could be
 12 undertaken.

13 No clear or comprehensive response emerged in
 14 the corporate statements from the Scottish Government.
 15 No messages were provided.

16 As I have already set out, extensive individual
 17 Rule 9 requests were also compiled for individuals who
 18 worked within the Scottish Government operation.
 19 The responses to these requests have been administered
 20 by the Scottish Government through its Covid Inquiry
 21 response team. These requests for information about
 22 informal messaging and the messages themselves were
 23 reiterated to individuals at that time, in case they
 24 held such relevant informal messages. Some of
 25 the witness statements that we have received from key

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1 a reason for non-production before now. Such a notice
 2 is about to be served on the Scottish Government and so
 3 it should not act as an impediment in that regard going
 4 forward.

5 One thing that did become apparent when responses
 6 were received was that the Scottish Government wished to
 7 make something of its policy with regard to
 8 the operation of government via these informal messaging
 9 systems. As more detail of its precise position on that
 10 was required, a further corporate Rule 9 request was
 11 issued seeking detailed information about the policy and
 12 seeking to augment the lack of detail which
 13 the Scottish Government had provided to that point on
 14 this issue, in particular in relation to informal
 15 messaging groups which were connected to the Covid-19
 16 response.

17 That corporate Rule 9 response, I am pleased to say,
 18 is nearly complete. The process of its compilation has
 19 been characterised by what I think could fairly be
 20 described as a gradual process of information being
 21 revealed, in particular about the policies upon which
 22 the Scottish Government wish to rely and the identity
 23 and membership of groups which existed and messages
 24 which it held. At each stage, more information was
 25 revealed which begged more questions and which required

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1 further time for response. It now appears to be
2 the position that there were, in fact, numerous groups,
3 137 on the current assessment, and numerous policies
4 which require to be considered.

5 Alongside this process and mindful of the fact that,
6 if informal messages existed in the hands of
7 individuals, the nature and extent of that would need to
8 be revealed with sufficient time for them to be
9 recovered and considered, the Inquiry asks
10 the Scottish Government Inquiry response team, who have
11 been assisting with the preparation of individual Rule 9
12 statement responses, to ascertain the position of each
13 individual, as regards their usage of such systems and
14 the current availability of any messages for
15 the Inquiry's inspection.

16 Again, the position in this regard has evolved
17 gradually. To enable us to provide openness and clarity
18 about the position in this regard, both generally and at
19 this hearing, we ask the Scottish Government Inquiry
20 response team to set out in a table the position of each
21 individual, around 70 witnesses in total, as to their
22 usage of such messages, including details of groups in
23 which they participated and the identity of individuals
24 with whom they corresponded in connection with the
25 government pandemic response, what messages still exist

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1 these matters was the very reason why the table was
2 requested in the first place.

3 Further, in places, the information provided in
4 connection with individual witnesses or in their draft
5 witness statements is incomplete, as regards the extent
6 of their usage of informal messaging. There is also
7 little detail about how messages which have not been
8 retained came not to be retained or as to the
9 justification for that position, for instance, whether,
10 when, how and why they were deleted, if that is
11 the case.

12 All of this has been requested and the requests have
13 been repeated in discussions with
14 the Scottish Government's legal department. The detail
15 required to understand the full picture has not yet been
16 forthcoming. As a result, the Inquiry is currently
17 considering what steps to take next. This may involve
18 issuing of further Rule 9s or, indeed, section 21
19 notices to ensure that the important details of
20 the position are revealed and revealed fully to
21 the Inquiry. Whatever route is deemed to be the most
22 appropriate, a swift response will be expected.

23 In summary, there remains a lack of clarity about
24 what usage was made of these informal messaging systems,
25 what potentially relevant content is still held, where

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1 and, if they do not exist, why they do not.

2 A clear theme of the overall response received from
3 and via the Scottish Government is that, although such
4 messaging systems were used in the pandemic response,
5 including by some key decision-makers and others,
6 generally very few messages appear to have been
7 retained.

8 This is surprising, in particular in light of
9 the apparent availability of such messages in high
10 volumes within the UK Government. This state of affairs
11 has merited further detailed investigation, in
12 particular seeking clarification of whether, how and why
13 messages came to be deleted and of the policies under
14 the terms of which individuals claim that they were
15 entitled to do that, if that is indeed their position.

16 It is important to point out, my Lady, that,
17 although a significant amount of useful information has
18 been provided by the Scottish Government, as is
19 reflected in the table, the precise position as regards
20 the use of and access to WhatsApps is incomplete, and
21 they continue to provide further information and
22 evidence. The table simply provides no current response
23 on behalf of some of the named witnesses, indicating
24 that this will be forthcoming in the witness's draft
25 statement. The need not to wait for the statements on

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1 it might be held and what can be recovered by
2 the Inquiry and, if it is not still held, why not.

3 The Inquiry has sought further information about
4 the circumstances in which such messages have not been
5 retained and is now considering how to push the matter
6 forward against that background.

7 For the avoidance of doubt, similar requests have
8 been made of other witnesses who played a role in
9 the Module 2A-related pandemic response. Public Health
10 Scotland, for example, has provided access to certain
11 WhatsApp conversations as a part of its general
12 disclosure to the module. Further, one individual who
13 worked for the Scottish Government during the pandemic
14 has voluntarily provided the Inquiry with certain of her
15 WhatsApp messages. Even then, without apparent
16 explanation, these are limited to a five and a half
17 month period, when the scope of the module clearly runs
18 from January 2020 to April 2022.

19 As I hope to have highlighted, the position as
20 regards the recovery of documents and of these
21 potentially material informal messages from
22 the Scottish Government has been a gradual one. Time no
23 longer permits a gradual approach, if it ever did. We
24 have taken steps to accelerate this process, which we
25 hope will bring the necessary materials to our

28

1 attention.

2 One thing I would like to add is a note of caution:
3 though this gradual process is not what we might have
4 preferred, we have not yet had the opportunity to
5 examine what messages still exist. We intend to keep
6 an open mind as to the significance of the responses and
7 not rush to the conclusion that these messages do
8 provide the key to understanding the processes of
9 Scottish Government decision-making in the pandemic. We
10 will not rush to conclusions, but reach them on
11 the basis of the evidence we uncover. One thing of
12 which you can be assured, my Lady, is that we will
13 continue to push this issue until we are satisfied that
14 we are in a position to do so.

15 Notebooks and dairies.

16 The Inquiry has made requests for notebooks and
17 dairies from all Scottish Government witnesses. It was
18 originally understood from the Scottish Government that
19 the vast majority of the witnesses for whom they are
20 responsible do not hold and may never have held such
21 materials. The Scottish Government provided the Inquiry
22 with one e-copy notebook, which was disclosed to the
23 core participants on 9 October. Hard copy notebooks
24 from two further individuals were provided to the
25 Scottish Government and these have been reviewed by the

29

1 witnesses in this regard in advance of today's
2 preliminary hearing, with the result that we have now,
3 in fact, been told that there are 57 notebooks which
4 have been located, with further notebooks being held by
5 an additional four individuals who retain an as yet
6 unconfirmed number. It remains unclear as to whether
7 further such notes will emerge in due course. We
8 continue to push for a complete answer.

9 Legal professional privilege waiver request.

10 After prior discussions in this regard, on
11 3 August 2023, Module 2A formally requested that
12 the Scottish Government waive privilege in the documents
13 being provided to the Inquiry.

14 Further to this, on 14 August of this year,
15 the Inquiry wrote to the Scottish Government explaining
16 that the Inquiry was constrained from fully carrying out
17 its function as a result of not having access to
18 material which had been redacted from documents by
19 reason of legal professional privilege or pursuant to
20 the Law Officers' Convention.

21 Module 2A stated for the Inquiry to understand to
22 the fullest extent possible all of the considerations
23 which were taken into account by ministers and
24 officials, it needed to see all advice provided to them
25 of any description, including any legal advice they were

31

1 legal team for relevancy. Once the review process has
2 been completed in relation to these notebooks, Module 2A
3 will disclose any relevant material as soon as they can.

4 At the time when the CTI, the Counsel to the
5 Inquiry, note was drafted two weeks ago, these were
6 the only notebooks Module 2A had been provided with by
7 or via the Scottish Government. As Ms Mitchell set out
8 in her submission on behalf of Scottish Covid Bereaved,
9 we too found it difficult to believe that so few notes
10 would have been kept within the Scottish Government in
11 its complex management of the pandemic, when the need to
12 digest complex and voluminous information in short
13 timescales, often remotely from usual working locations,
14 would tend to suggest that doing so would be
15 an important part of maximising the efficiency of
16 the process.

17 Thus, we asked the Scottish Government to continue
18 to carry out checks to confirm that no other notebooks
19 or dairies are held, either within
20 the Scottish Government or by relevant individual
21 witnesses.

22 In a not unfamiliar pattern, more information in
23 this regard has come to light gradually. The Inquiry
24 asked the Scottish Government to provide a clear update
25 on the position of the various Scottish Government

30

1 given. If legal advice is redacted, the Inquiry can
2 only see part of the story and may miss important
3 material that might help to explain the decisions taken.
4 As any relevant documents will also need to be disclosed
5 to core participants, may need to be ventilated at
6 hearings and may need to be published and referred to in
7 the final report, it will be necessary for documents to
8 have legal advice contained within them visible to the
9 public at large, as well as for the content of them to
10 be fully understood.

11 In light of the above and the significant practical
12 advantages of doing so, the Inquiry requested that
13 the Scottish Government waive legal professional
14 privilege and the Law Officers' Convention privilege.
15 If the Scottish Government is not amenable to doing so,
16 Module 2A has requested that a schedule be completed by
17 the Scottish Government which justifies the claims to
18 privilege that have been made.

19 To date, all documents which have been provided to
20 which privilege applies have had passages redacted based
21 on LPP. No explanation as to why these particular
22 passages have been redacted has been provided.

23 The waiver request has been discussed between
24 the Scottish Government and the Module 2A legal team on
25 a number of subsequent occasions. At this point, many

32

1 redacted documents have already been provided and
 2 processed. The hearing is imminent. In the run-up to
 3 the preliminary hearing, the Inquiry has been provided
 4 with a proposal addressing part of its request in this
 5 regard, which is the subject of current consideration
 6 and discussion. Core participants will be kept updated
 7 of any progress.

8 Four, general documentary discovery and disclosure
 9 to core participants.

10 In summary, Module 2A has received to date
 11 31,553 documents in total, including 53 Rule 9 responses
 12 from impact organisations; 15 initial Rule 9 responses
 13 from members of the Scottish Government Covid Advisory
 14 Group; 70 draft Rule 9 statements, including 62 draft
 15 individual statements; 26 finalised Rule 9 corporate
 16 statements; and 28 finalised Rule 9 individual
 17 statements.

18 The Inquiry has disclosed to core participants
 19 7,221 documents to Module 2A core participants,
 20 including general disclosure, which includes
 21 the following: 59 Rule 9 responses and exhibits, which
 22 consist of 23 individual statements and 36 corporate
 23 statements, which include Module 2 statements relevant
 24 to Module 2A. This group also includes 16 Rule 9
 25 responses from individuals to requests issued solely by

33

1 extensions for witness statements where this was
 2 considered necessary and appropriate across all
 3 categories of Rule 9 requests issued.

4 Some are overdue, including the important statement
 5 from the Secretary of State for Scotland, from whom
 6 a partial response only has been received. Those in
 7 that position should be aware that the Inquiry has
 8 further powers to compel that statements are provided.
 9 The dates for the substantive hearings have been known
 10 for many months and the need for a timely and complete
 11 response has been stressed on numerous occasions, both
 12 formally and informally, in connection with the issuing
 13 of the requests. The Inquiry expects its requests to be
 14 complied with in short order.

15 Many of the deadlines set for the draft statements
 16 in the Inquiry's Rule 9s fall in October and
 17 November 2023. Accordingly, save for exceptional
 18 circumstances and provided that witnesses comply with
 19 the deadlines set, Module 2A expects to have received
 20 all draft witness statements in sufficient time to
 21 enable disclosure of the vast majority of signed
 22 statements by December 2023.

23 As I indicated earlier, and whilst 7,221 documents
 24 have been disclosed across 11 separate tranches of
 25 material, Module 2A has a significant volume of

35

1 this module.

2 It also includes 52 Rule 9 responses from impact
 3 organisations, including those jointly instructed with
 4 the other Module 2s, and 15 initial Rule 9 responses
 5 from the members of the Government Covid Advisory Group.

6 Within the materials disclosed to core participants
 7 to date are all substantive Rule 9 responses received
 8 from impact organisations with supporting documents and
 9 footnoted materials; all initial responses received from
 10 the Scottish Government Covid Advisory Group
 11 participants with supporting documents and footnoted
 12 material; expert reports and materials from Public
 13 Health Scotland, NHS National Services Scotland,
 14 the National Police Chiefs' Council, the Children and
 15 Young People's Commissioner for Scotland, the Scottish
 16 Trades Union Congress, Audit Scotland, the Scottish
 17 Courts and Tribunal Service, Scottish Care and
 18 the Scottish Government.

19 Module 2A will continue to make disclosure to
 20 core participants on a regular basis. In addition to
 21 general disclosure across a number of providers,
 22 Module 2A intends to disclose key statements and
 23 exhibits from Nicola Sturgeon, Humza Yousaf,
 24 John Swinney, Jeane Freeman, Kate Forbes and
 25 Leslie Evans imminently. The Inquiry has agreed

34

1 documents left to review, assess for relevance and work
 2 through before they can be released to
 3 core participants. The largest of these providers are
 4 the Scottish Government and Public Health Scotland.
 5 The legal team is working swiftly to review this
 6 material and we wish to put on record our thanks to
 7 those material providers who are assisting with this
 8 important process and doing so at pace. There remains
 9 much to be done and materials will continue to be made
 10 available to core participants as quickly as possible.

11 Module 2 cross-modular disclosure.

12 The Inquiry is aware that some evidence received by
 13 Module 2 and some oral evidence provided at the Module 2
 14 public hearings is likely to be relevant to Module 2A.
 15 In order to ensure that core participants have access to
 16 Module 2 material that is relevant to Module 2A,
 17 the Inquiry has been and is conducting a cross-modular
 18 review to identify material relevant to Module 2A in
 19 this category.

20 This has involved dedicated work from both
 21 the Module 2A solicitor and counsel teams. As a number
 22 of our core participants have been core participants in
 23 Module 2 and hence -- Module 2 or Module 1 -- and hence
 24 involved in the work of those prior modules of
 25 the Inquiry, they will have had access to this material

36

1 already and indeed may be well placed to assist with
2 drawing the Module 2A team's attention to documents
3 which they think ought to form part of Module 2A
4 evidence proposals in due course.

5 The Inquiry intends to disclose any material
6 considered relevant to Module 2A to core participants
7 and indeed has already started to do so, including
8 expert reports.

9 This will include witness statements, exhibits, and
10 aspects of general disclosure that has been received by
11 Module 2. However, the Inquiry will be limiting
12 the disclosure of material to those documents that are
13 strictly relevant, ie where a witness statement
14 discusses issues relevant to Module 2A it will be
15 disclosed to core participants. It follows that not all
16 of the exhibits to such witness statements will be
17 disclosed in Module 2A, they will only be disclosed if
18 those exhibits are also considered relevant to the work
19 of this module.

20 Five, list of issues, plans for the hearings in
21 January 2024, and provisional list of witnesses.

22 The list of issues.

23 Core participants and those with an interest in
24 the module will be aware that a provisional scope for
25 the module was issued in the summer of 2022, alongside

37

1 As was intimated at the last preliminary hearing in
2 March, the Inquiry has sought to co-ordinate the scopes
3 of each part of Module 2 so as to ensure fairness and
4 consistency amongst the four nations of
5 the United Kingdom. As was predicted by me at that
6 time, our investigations have inevitably shown that
7 the broad issues identified in the scopes differ as
8 between each of the four parts of the module.
9 The timeline in Module 2A thus differs from that in
10 other modules. The issues to be examined are inevitably
11 different due to the different structures involved in
12 decision-making in and for Scotland, the different
13 trajectory of the pandemic in Scotland, considerations
14 arising from devolution, its different advisory
15 arrangements and legislative and enforcement mechanisms.
16 The objective throughout has been to achieve consistency
17 to the extent that the facts will bear but also to
18 respect that these differences demand to be respected.

19 Provisional witnesses.

20 The Inquiry has not made any final decisions about
21 which witnesses will ultimately be required to give
22 evidence at the Module 2A public hearings. The Inquiry
23 is still awaiting receipt of further statements and so
24 no final decisions will be made until the Inquiry has
25 received the vast majority, although hopefully all, of

39

1 similar scopes for the associated Modules 2, 2B and 2C.
2 As was trailed at the last preliminary hearing in March,
3 a more detailed list of issues which we propose will be
4 addressed in Module 2A was circulated to
5 core participants on 12 May of this year.

6 Core participants were asked to provide their comments
7 on that list. We are grateful for the comments
8 provided. Following consideration by the Module 2A team
9 and the Chair, a revised list of issues was provided to
10 core participants.

11 The list of issues thus attempts to frame with some
12 clarity the matters which will ultimately be addressed
13 in the report on matters which are covered by Module 2A.
14 As in all matters, the investigative and inquisitive
15 nature of the process in which we are involved means
16 that the list should not be deemed to be closed. Our
17 understanding of the scope increases on a daily basis,
18 and so the possibility that further important issues
19 will be identified remains open. But for practical
20 purposes, the list needs to be given some element of
21 finality with that caveat, and our list is now, in our
22 view, in such a form. The list should be used, by those
23 asked to contribute to the module, as a guide to what we
24 intend to cover and thus on which their contribution
25 will be both welcome and expected.

38

1 the witness statements and considered representations
2 from core participants.

3 However, the Module 2A team has written to some
4 potential witnesses to give them notice of the dates of
5 the public hearing and to ask them to provide any dates
6 to avoid. In many cases, this notification has been or
7 will be provided to the witness through their legal
8 representative. It is possible that not all of those
9 individuals who have been given advance notice will be
10 called. It is also possible that some additional
11 individuals may be notified of the Inquiry's intention
12 to call them as witnesses.

13 In writing, we have tried to err on the side of
14 contacting potential witnesses, so as to minimise
15 the chance of any difficulties with any individual
16 witness arising.

17 The Module 2A team proposes to send out
18 a provisional list of witnesses to core participants in
19 November 2023, setting out the names of those who may be
20 called to give oral evidence at the public hearing
21 commencing on 16 January 2024.

22 We are grateful to Scottish Covid Bereaved for
23 providing us with suggestions about possible witnesses,
24 as we requested that they do. Having had an initial
25 perusal of the list and focusing on government

40

1 ministers, employees or advisers, the vast majority on
2 their list have received Rule 9 requests and many are
3 already in our thinking for the oral hearings in
4 January.

5 Also, we are equally grateful to the Disabled
6 People's Organisations for providing some suggestions in
7 their submission to the Inquiry of three such possible
8 individuals. They will be considered. For
9 the avoidance of doubt, the three individuals mentioned
10 by the Disabled People's Organisations have all provided
11 draft written statements about the extent of their
12 involvement in the matters with which we are concerned.

13 As I have said, core participants will be invited to
14 make observations on the draft list in November.

15 For the avoidance of doubt, the current intention is
16 that the representatives of certain Scottish impact
17 organisations will be called upon to give oral evidence
18 on their organisation's behalf about the experiences of
19 the organisation resulting from the pandemic and
20 the individuals whom they represent, and, more
21 particularly, about the role which those organisations
22 played in trying to influence government
23 decision-making.

24 As will be expected the focus of the hearings will
25 be on the decisions of government, in particular

41

1 the hearings to focus on the key controversies and
2 issues. It is intended that key aspects of the agreed
3 uncontroversial background material will be set out by
4 Counsel to the Inquiry in the opening statement.

5 Core participants will be accorded the opportunity to
6 make opening and closing statements at the hearings.

7 In addition, core participants will be invited to
8 engage in the hearing preparation process which has been
9 adopted by the Inquiry in Module 2. This will involve
10 evidence proposals being produced and core participants
11 being permitted to propose important documents and
12 suggest potential lines of questioning for witnesses in
13 connection with those evidence proposals which will be
14 sent to them in advance of the hearings.

15 The intention in our module is to try to follow
16 a regimented process, whereby a draft evidence proposal
17 for a witness is circulated to core participants
18 a certain period before the witness is due to give
19 evidence, with clear indicators as to the date by which
20 a response is expected. The same will apply to
21 applications to contribute to questions to be asked by
22 Counsel to the Inquiry or applications to ask questions,
23 the opportunity for both being invited simultaneously.

24 Thus, the timescales for each witness in which
25 a particular core participant might be interested will

43

1 the Scottish Government.

2 Key ministers will be called to give evidence,
3 including the former First Minister, Nicola Sturgeon;
4 the current First Minister, Humza Yousaf; the former
5 Deputy First Minister, John Swinney; and the former
6 Cabinet Secretary for Health and Sport until May 2021
7 Jeane Freeman; all of whom played pivotal roles in
8 the Scottish Government's pandemic response.

9 Hearing preparation.

10 As previously announced, the hearings in Module 2A
11 will take place in Edinburgh and commence on
12 16 January 2024 at the Edinburgh International
13 Conference Centre. Ahead of the hearings, Module 2A
14 intends to share key documents which it has prepared
15 with core participants relating to key thematic areas
16 and which are proposed to be uncontroversial background
17 to the matters being covered in the module. It is
18 likely that these will include a chronology of key
19 decisions and events, including restrictions, details of
20 the structures involved in decision-making and advice,
21 the identity of key individuals involved in
22 decision-making, and the material provisions of
23 legislation relevant to the Scottish pandemic response.

24 The intention of these will be that they will cover
25 some of the uncontroversial background, allowing

42

1 be clearly proscribed from the start, hopefully
2 increasing certainty and providing a reasonable
3 opportunity to contribute to the hearing preparation
4 process.

5 We are aware of the potential issues that
6 the Christmas break may have in this regard. Once
7 the final list of witnesses has been decided upon, after
8 consultation in November, and the order is fixed,
9 consideration will be given to how best to time
10 the process, given the need to balance the requirement
11 to provide core participants with a reasonable
12 opportunity to participate and the likely limitations of
13 the festive season.

14 As a stepwise approach will be necessary, precise
15 details of and timings of what we intend in that regard
16 will continue to be provided to the core participants,
17 either as necessary or in monthly update notes to be
18 issued in due course.

19 Expert witnesses.

20 As set out in the previous monthly update notes,
21 Module 2A, in conjunction with Modules 2, 2B and 2C, has
22 issued instructions to the following experts who have
23 provided or agreed to provide evidence to the Inquiry on
24 matters relating to Scotland, which will be covered by
25 Module 2A, as well as in connection with the subject

44

1 matter of those other modules.

2 Professor Thomas Hale of Oxford University has
3 reported on international data relating to the Covid-19
4 pandemic, in particular in analysing the effectiveness
5 of decision-making in the UK and each of the devolved
6 administrations, in comparison to other countries. This
7 report has been disclosed to core participants in final
8 form and the report was presented at the Module 2's
9 public hearing on 11 October.

10 Professor Ailsa Henderson from the University of
11 Edinburgh has reported on the political structures for
12 devolution within the UK and mechanisms for
13 intergovernmental decision-making between the UK
14 Government and the devolved administrations during
15 the Covid-19 pandemic. Her report was disclosed to
16 core participants in final form and the report was
17 presented at the Module 2 public hearing on 9 October.

18 An expert report relating to political
19 decision-making in the management of the pandemic in
20 Scotland has also been commissioned by Module 2A from
21 Professor Paul Cairney, professor of politics and public
22 policy at the University of Stirling. This report is
23 currently in draft form. A draft will be circulated to
24 core participants for their comment in due course,
25 following a similar process to the finalisation of other

45

1 the Module 2A scope relating to Scotland. Evidence from
2 these experts has been adduced and led in Module 2,
3 including from Professor James Nazroo,
4 Professor Laia Bécáres, Professor Tom Shakespeare,
5 Professor Nicholas Watson, Dr Clare Wenham and
6 Professor David Taylor-Robinson.

7 A further expert report has been disclosed to
8 core participants prepared by
9 Professor Chris Brightling, professor of respiratory
10 medicine at the University of Leicester, and
11 Dr Rachael Evans, in relation to Long Covid. These
12 reports were presented at the Module 2 public hearing on
13 13 October.

14 The current provisional intention of Module 2A is
15 that it will not lead further evidence from the experts
16 who have spoken about matters of general relevance
17 across the UK, such as Professor Brightling or Dr Evans,
18 or whose reports have specifically covered Module 2A in
19 their remit, including Professor Henderson and
20 Professor Hale, and the inequality experts, whose
21 written and oral evidence already covers Scottish
22 considerations.

23 The evidence which they have provided to the Inquiry
24 remains available for consideration at the M2A hearings
25 and/or in the final report on Module 2A matters. Issues

47

1 expert reports which have been commissioned previously
2 by the Inquiry.

3 Expert reports of indirect relevance to the matters
4 for consideration in Module 2A were also commissioned by
5 Module 2 from Alex Thomas and Gavin Freeguard.
6 Alex Thomas is from the Institute for Government, and
7 was instructed to report on the decision-making
8 structures of the UK Government in an emergency.
9 Gavin Freeguard, former programme director and head of
10 data and transparency at the Institute for Government,
11 was instructed to report on the access to and use of
12 data by the UK Government during the pandemic. Reports
13 from these two experts have been disclosed to
14 core participants in final form. Gavin Freeguard's
15 report was presented at the Module 2 public hearing on
16 10 October, and Alex Thomas' report was presented on
17 13 October.

18 In your ruling of 9 March, my Lady, you directed
19 that the Inquiry should obtain evidence from an expert
20 or experts on the nature and degree of pre-pandemic
21 structural racism. The ruling also makes clear that
22 expert evidence should be obtained regarding
23 pre-existing structural discrimination on other grounds.
24 A number of experts were instructed in accordance with
25 this ruling, including in relation to matters within

46

1 arising from their evidence about governmental,
2 including intergovernmental structures, NPIs, structural
3 inequality and, by extension, inequality in political
4 decision-making and outcomes, have been and will be
5 canvassed at the Module 2A hearings with other
6 witnesses. It is likely that I will cover key aspects
7 of this evidence in my opening statement at the hearings
8 in January.

9 The listening exercise, which we call Every Story
10 Matters, commemoration and impact film.

11 On 28 July 2023, the Inquiry provided a further
12 update on the ways in which an individual can share
13 their experiences with the Inquiry. Every Story Matters
14 was formally launched on 13 June 2023. The experiences
15 and stories shared are helping the Inquiry to build
16 a comprehensive picture of how the pandemic affected
17 people's lives across the UK, including in Scotland.
18 An updated web forum was made available in late May, and
19 to date thousands of responses have been submitted.
20 The public information campaign to make people aware of
21 Every Story Matters has been running on radio,
22 billboards, in the press and digital advertising.
23 The Inquiry has been working with charities and other
24 organisations to promote Every Story Matters to
25 seldom-heard voices. Campaign activity aimed at raising

48

1 awareness of Every Story Matters has been undertaken.
 2 Every Story Matters will take place in Scotland
 3 predominantly from the beginning of January 2024 and
 4 will run until the end of the Module 2A hearings. A new
 5 contract has been awarded to M&C Saatchi to support
 6 the advertising of Every Story Matters, and a new
 7 research and analysis contract has been awarded to Ipsos
 8 to help the Inquiry deliver the next stage of this
 9 important project.

10 We have recently launched our programme of UK-wide
 11 Every Story Matters events, which will enable people
 12 across the UK to speak to Inquiry staff in person about
 13 their experiences of the pandemic. We will be holding
 14 events in Scotland in the New Year. A new contract will
 15 soon be announced to help the Inquiry deliver further
 16 community events.

17 In addition, an impact film will be shown on
 18 the first day of the public hearings for Module 2A to
 19 set the tone for the subsequent proceedings, grounding
 20 them in the lived experiences of individuals living in
 21 Scotland who suffered and continue to suffer hardship
 22 and loss as a result of the pandemic. The video will be
 23 played publicly at the substantive hearings at the
 24 beginning of the January 2024 sessions.

25 Co-operation with the Scottish Covid Inquiry.

49

1 endeavour to do so, it may not always be possible to
 2 avoid all clashes over the duration of two such
 3 significant Inquiries. However, the CEO of
 4 the Scottish Inquiry has helpfully intimated that they
 5 will not have hearings in January 2024 so as to avoid
 6 a clash with the Module 2A hearings in this Inquiry
 7 which will take place at that time.

8 Most recently, the Inquiries have agreed an approach
 9 to help reduce the work required by common material
 10 providers in producing suggested redactions to both
 11 Inquiries and to ensure, where appropriate, consistency
 12 of redaction.

13 By the provision of a limited waiver of
 14 confidentiality, both Inquiries will permit material
 15 providers to share copies of redacted documents provided
 16 to the other Inquiry in addition to the clean copies
 17 requested, so as to demonstrate the redactions sought.
 18 It is hoped that this will reduce the work required by
 19 both the material providers and the Inquiries in
 20 processing redactions. Communications implementing this
 21 initiative will be sent out shortly.

22 In addition, the UK Inquiry also agreed to delay our
 23 advertising of Every Story Matters in Scotland while
 24 the Scottish Covid Inquiry was promoting its own
 25 Listening Exercise, Let's Be Heard, to avoid both

51

1 The Scottish Covid Inquiry has seen some personnel
 2 changes in recent months in both the secretariat and
 3 legal teams. Introductory meetings have taken place to
 4 enable the relevant team members to get to know each
 5 other and to ensure that the Inquiries continue to enjoy
 6 a positive working relationship. Regular meetings take
 7 place between both the secretariat teams and the legal
 8 teams during which various topics of mutual interest are
 9 discussed, in particular the efforts being made to
 10 minimise duplication and avoid hearing clashes.

11 As part of the continued co-operation between
 12 the two Inquiries, a joint core participant meeting took
 13 place in person on 7 June 2023 in Edinburgh.
 14 Core participants from both Inquiries were invited and
 15 the event was well attended. At the meeting,
 16 core participants were able to raise any questions they
 17 had in light of the memorandum of understanding and
 18 discuss the practical realities of the two Inquiries
 19 running simultaneously.

20 The Inquiries continue to communicate to avoid
 21 hearing clashes and recently successfully agreed
 22 an approach to avoid a clash between this preliminary
 23 hearing and the impact hearings now being conducted by
 24 the Scottish Inquiry.

25 It should be noted that although the Inquiries will

50

1 campaigns competing for information and potentially
 2 confusing those who wish to engage. The co-operation
 3 between these two important processes will, of course,
 4 continue.

5 Final comments.

6 I hope, my Lady, that this provides you with
 7 a useful analysis of the progress which has been made
 8 within the module since the last preliminary hearing in
 9 March of this year. I would like to reiterate
 10 the Inquiry's thanks to those who have complied with
 11 the requests, their hard work, and that of those who
 12 represent them. It is appreciated. It is also
 13 necessary.

14 As the hearings approach, I hope that what I have
 15 had to say also provides adequate encouragement to those
 16 who have provided less fulsome co-operation with
 17 the Inquiry's work than others to endeavour to do so in
 18 the remaining period in which we approach our evidential
 19 hearings in January. In the hope and expectation that
 20 that encouragement will achieve its aim, I hope and
 21 expect that further use of the Inquiry's extensive
 22 powers to compel will not be necessary. If I were to be
 23 proven wrong in that hope, we would not hesitate to do
 24 so.

25 May I also pay tribute to the legal team with whom

52

1 I am working, who the Scottish public can rest assured
2 are doing all this they can to deliver the M2A hearings
3 to the very best of their ability and with the fullest
4 and deepest investigation into the management of
5 the pandemic response in Scotland as we can achieve.

6 As Ms Mitchell KC said in her written submissions
7 for this hearing, though in a slightly different
8 context, those who lost their lives to Covid-19 deserve
9 nothing less.

10 **LADY HALLETT:** Indeed, Mr Dawson. Thank you very much
11 indeed. Extremely helpful.

12 I think it's probably best to take a break now, and
13 then when I come back, I shall hear from Ms Mitchell KC
14 and Mr Mitchell KC.

15 I shall be back at 11.55.

16 **(11.40 am)**

(A short break)

18 **(11.55 am)**

19 **LADY HALLETT:** Mr Dawson.

20 **MR DAWSON:** If you will indulge me, my Lady, there is just
21 one small point of clarification in relation to my
22 earlier submissions.

23 It relates to Every Story Matters. Every Story
24 Matters will of course run and be available for those
25 who would like to contribute throughout the duration of

53

1 that the Inquiry has taken the care to ensure the parity
2 of service which is available south of the border is
3 also being made available north of the border.

4 My Lady, I want to make a number of comments in
5 relation to requests for gathering of documentary
6 evidence from the Scottish Government, as you may not be
7 surprised. We thank the Counsel to the Inquiry for his
8 update on this, and we note the substantial number of
9 Rule 9 requests, 140 or so, as well as 103 detailed
10 Rule 9 requests to individuals, and, for those who have
11 complied and answered fully, Scottish Covid Bereaved are
12 very grateful.

13 We are, of course, however, most concerned and
14 disappointed that the Inquiry has received witness
15 statements that do not address all the matters raised in
16 Rule 9 requests and that there have been delays in
17 meeting the Rule 9 requests for documents and witness
18 statements.

19 As CTI has set out in his note -- sorry, Counsel to
20 the Inquiry has set out in his note, these difficulties
21 have the potential to disrupt the Inquiry's process
22 unless they are swiftly resolved.

23 Many of the parties involved in the delays have,
24 of course, significant resources and have had more than
25 due notice that these issues would be required to be

55

1 the Inquiry. There will, however, be particular events
2 and activity designed to promote engagement with it,
3 which will take place in Scotland at around the time of
4 the M2A hearings, which, as we know, will be taking
5 place in January.

6 **LADY HALLETT:** Thank you very much, Mr Dawson.
7 Ms Mitchell KC.

8 **Submissions on behalf of Scottish Covid Bereaved by**
9 **MS MITCHELL KC**

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

11 We're grateful to Counsel to the Inquiry for
12 the detailed note setting out the matters which are to
13 be addressed at this hearing, and we note that Module 2A
14 will look at making recommendations on
15 the Scottish Government's core political and
16 administrative decision-making response to the Covid-19
17 pandemic between early January 2020 and April 2022.

18 As, of course, will be appreciated, this is of
19 the utmost importance to those in the Scottish Covid
20 Bereaved.

21 The Scottish Covid Bereaved firstly would say that
22 we are very pleased that the substantive oral hearings
23 will be taking place in Scotland, and we look forward to
24 the commencement of those at the hearing place,
25 the International Conference Centre, and we are happy

54

1 addressed. As my Lady can only be all too aware of, we
2 are now less than three months away from the start of
3 Module 2A. It is of the utmost importance that
4 the Inquiry's requests are dealt with timeously to allow
5 the Inquiry to ingather the material and importantly to
6 disclose it to core participants well in advance of the
7 hearings in January, in order that core participants
8 have an opportunity to fully be involved in the process.

9 In the event that the matters requested by
10 the Inquiry aren't properly dealt with by the material
11 providers and the witnesses, we welcome Counsel to
12 the Inquiry's proposal to explore the reasons why there
13 are unanswered matters at further hearings.

14 However, we will go on to suggest that perhaps
15 a stronger encouragement might be required in that
16 regard.

17 We're aware from the materials disclosed and the
18 evidence thus far led in Module 2 of the critical
19 importance of contemporary notes and messages from civil
20 servants, special advisers and politicians in
21 establishing how core political and administrative
22 decisions were made and the reasons why those decision
23 were made. The release of WhatsApps, social media,
24 dairies, et cetera, have been critical in building
25 a picture of the state of preparation, or rather

56

1 the lack of it, for the pandemic, the impact of those
2 decisions and the attitudes and conflicts that existed
3 with the devolved administrations.

4 We are, as has been highlighted by Counsel to
5 the Inquiry, astonished by the terms of the table that
6 has been provided by the Scottish Government on its
7 position about relevant information held by it in
8 notebooks and WhatsApps. When I say "WhatsApps",
9 my Lady, I'm using the same short-term terminology as
10 Counsel to the Inquiry to mean any forms of these social
11 communications.

12 My Lady, we note what Counsel to the Inquiry has
13 said with grave concern in relation to what has now been
14 told. The Scottish Covid Bereaved found it difficult to
15 accept that most senior politicians in Scotland, making
16 crucial decisions affecting the lives of everyone in
17 the country, were able to attend numerous meetings, have
18 sight of scientific and medical papers and take
19 decisions without apparently taking any notes to assist
20 them in their decision-making process. We now hear that
21 57 notebooks have been recovered and there are more to
22 come. It was difficult to understand how any politician
23 could provide an accurate account several years removed
24 of being in rooms, who was present, the relationships
25 involved and how decisions were arrived at, without

57

1 "I'm sorry to say, but the Sunday Mail is
2 a non-story. Nobody's asked for these WhatsApps yet for
3 the Scottish Inquiry, so therefore nobody's one's
4 refused. So the idea of demanding that you get
5 something that no one's yet asked for and no one's yet
6 refused to give is not a story as far as I'm concerned."

7 From the above exchange, we concluded that WhatsApp
8 messages remained in existence, perhaps at least for
9 Ms Freeman, and now it seems that conclusion was well
10 placed. At the preliminary hearing in London on
11 1 March, we stated that anything less than full
12 disclosure would be considered an attack on
13 the integrity of both the UK and the Scottish public
14 inquiries by the Scottish Covid Bereaved. We said that
15 no individual, no matter how powerful, can be allowed to
16 interfere with the pursuit of truth, justice and
17 accountability in this Inquiry, and, as has already been
18 foreshadowed by my learned friend Mr Dawson KC, those
19 who lost their lives to Covid-19 deserve nothing less.

20 We note that the ICO office has already warned
21 government officials that deleting messages that could
22 relate to investigations into alleged rule breaking
23 parties at Number 10 Downing Street and other
24 departments would be a criminal offence. The Scottish
25 Covid Bereaved believe it's an important principle of

59

1 having any contemporaneous notes to assist them. Now,
2 we find that such notes do exist.

3 We would ask if the Inquiry would ask of the civil
4 servants who supported ministers as well whether they
5 have any records of any WhatsApp groups or any
6 electronic recording of communications with ministers.
7 We would also ask if the Inquiry can ascertain if there
8 was any official or unofficial policy of deleting
9 WhatsApps.

10 My Lady will recall, also in relation to Module 2,
11 that Mr Boris Johnson's electronic communication was
12 recovered by experts. Might that be something that can
13 be done here for messages which have auto-delete? We
14 would be grateful if the Inquiry could confirm these --
15 we would be grateful if the Inquiry could consider these
16 requests, and take steps accordingly, if necessary.

17 We noted with some surprise the table that said
18 there were no relevant WhatsApps, not only because we
19 thought that was inherently unlikely but also because,
20 on 4 June 2023, on the BBC Scotland's Sunday Politics
21 programme, the former health minister Jeane Freeman was
22 asked about a headline that raised the fact that
23 Aamer Anwar & Company had, in fact, called for WhatsApp
24 messages and other materials to be released. Ms Freeman
25 stated:

58

1 government transparency and accountability that official
2 records are kept of key actions and decisions, that
3 relevant information that exists in private
4 correspondence channels of public authorities should be
5 available and included in responses to information
6 requests received.

7 The Freedom of Information Act requires a code of
8 practice providing a framework for public authorities to
9 manage information and records and comply with their
10 obligations under Freedom of Information and other
11 relevant legislation, such as the Public Records Act
12 1958. The code makes it clear that public bodies should
13 keep information if it needs it for reference or when
14 there may be a public inquiry.

15 As touched on before, we are extremely disappointed
16 by the apparent failure by politicians and civil
17 servants to retain messages and the seemingly widespread
18 use of the auto-delete function. From the CTI's note,
19 it appears that the majority of the relevant messages
20 have not been retained by individuals.

21 Module 2A will cover decision-making between
22 January 2020 and April 2022. On 24 August 2021,
23 the Scottish Government announced plans for the Scottish
24 Covid Inquiry. It ought to have been obvious to
25 the politicians and civil servants from that date, if

60

1 not of course earlier, that their contemporaneous
2 messages may be of relevance to a public inquiry. It is
3 requested that the Inquiry seek to establish with these
4 witnesses what, if any, steps they took after this date
5 to stop the use of auto-delete function on their
6 messaging services and what, if any, steps they took
7 where there was a change of mobile phone to ensure that
8 all relevant messages were retained.

9 While we appreciate there's only a short time
10 remaining before the commencement of the substantive
11 hearings, we would be grateful if the Inquiry could take
12 all possible steps to retrieve what we consider may be
13 crucial messages.

14 Finally, on this point, we would ask that
15 the Scottish Government be asked to provide a formal
16 response as to how the table drawn up and supplied to
17 the Inquiry and core participants told us things which
18 were incorrect. It was clear that what was given to us
19 was incomplete, that said, in relation to critical
20 witnesses, that they had no notes and no WhatsApps, and
21 we now know that this is not the case.

22 This does not inspire confidence in
23 the Scottish Government's approach to its full
24 co-operation with this Inquiry. Saying "We are
25 co-operating" is one thing, doing it is quite another,

61

1 Officers' Convention.

2 As Counsel to the Inquiry has set out in their note,
3 and to the Scottish Government, that in order for
4 the Inquiry to understand to the fullest extent possible
5 all of the considerations which were taken into account
6 by ministers and officials, it needs to see all advice
7 provided to them of any description, including any legal
8 advice that they were given.

9 Were the legal advice to be redacted, the Inquiry
10 can only see part of the story and may miss important
11 material that might help them explain and understand
12 the decisions that were taken.

13 The Scottish Covid Bereaved support the Inquiry's
14 attempts to obtain the fullest material to allow it to
15 carry out its functions. We are aware from other
16 modules that the Inquiry can and will redact sensitive
17 and irrelevant information before disclosing it to
18 core participants. It is vital that the Inquiry obtain
19 this material from the Scottish Government. No
20 government or politician, whether based in Westminster
21 or Holyrood, should seek to hide behind LPP to stop
22 the public finding out what happened in the corridors of
23 power during the pandemic.

24 We support the call made by Counsel to the Inquiry
25 to waive legal professional privilege. The public

63

1 and we are pleased at the robust attitude that is being
2 displayed by Counsel to the Inquiry in his approach to
3 obtaining all relevant information held in any way.

4 We note the suggestion of Counsel to the Inquiry
5 that Rule 21 notices may be served. Given the history
6 of disclosure to date, my Lady, we ask that no further
7 time is given to the Scottish Government and that such
8 notices are served at the earliest opportunity.

9 The Rule 9 process adopted to date has left us with
10 late, incomplete and wrong information being provided to
11 the Inquiry and to core participants. A section 21
12 notice, with its failure to comply without reasonable
13 excuse being a criminal offence which is punishable by
14 fine and imprisonment, is likely to focus minds in
15 respect of time, and encourage the most thorough process
16 of it complying with requests. Then we can have
17 confidence that disclosure has been properly made.

18 Moving on briefly, my Lady, to legal professional
19 privilege.

20 We note the terms of Counsel to the Inquiry's note
21 that the Inquiry wrote to the Scottish Government
22 explaining that the Inquiry was constrained from fully
23 carrying out its function as a result of not having
24 access to material which has been redacted from
25 documents by reason of LPP or pursuant to the Law

62

1 servants who made decisions affecting every person in
2 this country ought to be as transparent as possible to
3 allow the essential work of this Inquiry to take place.

4 My Lady, moving on to list of issues and provisional
5 list of witnesses.

6 The Counsel to the Inquiry has now gone into this in
7 some detail, and I don't need to rehearse matters for
8 you, my Lady. We were delighted to meet with Counsel to
9 the Inquiry and provide a list of issues and also a very
10 full witness list of whom the Scottish Covid Bereaved
11 thought may be helpful to the Inquiry in obtaining the
12 information it needed to know.

13 We are pleased to hear that many of the names that
14 had been given were ones already being considered by
15 the Inquiry, and we hope that those names that we have
16 given that hadn't already been flagged up will now be
17 given careful consideration. We appreciate, of course,
18 that not -- due to constraints of time -- every person
19 can be called to give evidence, but there is of course
20 the opportunity of obtaining witness statements from
21 them in writing rather than orally.

22 Moving on to a discrete issue about witnesses,
23 namely that of expert witnesses, the Scottish Covid
24 Bereaved are aware that we have a number of expert
25 witnesses in relation to Module 2, and we wish to stress

64

1 no issue is being taken with the expertise of these
2 witnesses to date. However, we do note that in some
3 reports the information is based on data and experiences
4 from England.

5 We would be grateful if the Inquiry could confirm
6 that, should these witnesses give evidence in Module 2A,
7 they will specifically focus on the situation as it
8 exists in Scotland and be asked, where necessary, to
9 explain if the data that they are using comes from
10 Scotland or the UK.

11 My Lady, we make this request now simply to avoid
12 having to make separate requests individually if further
13 expert reports are going to be given.

14 Co-operation with the Scottish Covid Inquiry.

15 Firstly, we note that, as a result of the Scottish
16 Covid Inquiry not sitting today, I am able to present
17 this submission to the court, and we're obliged to both
18 the Scottish Covid Inquiry and the UK Covid Inquiry for
19 coming to this accommodation. We note that co-operation
20 exists between the two Inquiries and the efforts to
21 avoid not only clashes of time but duplication of work.

22 We note that the Inquiry will endeavour to avoid
23 hearing clashes, but it may not be possible to avoid all
24 clashes. The Scottish Covid Bereaved do appreciate
25 that, and they also appreciate that they and those

65

1 playing a key role in the process but real key decisions
2 were being taken elsewhere.

3 This makes it even more important to understand what
4 decisions were being taken in Scotland, by who, and on
5 the basis of what science and what data. It is
6 imperative that, as the Inquiry turns its gaze
7 northwards, the Scottish Government, its ministers and
8 its civil servants provide all possible assistance to
9 the Inquiry. Only with such assistance will the Inquiry
10 be able to provide the answers that the Scottish Covid
11 Bereaved and the people of Scotland need and deserve.

12 Those are the submissions on behalf of the Scottish
13 Covid Bereaved.

14 **LADY HALLETT:** Thank you very much indeed, Ms Mitchell. As
15 ever, you make some very valid points.

16 I shall now turn to Mr Mitchell KC, to see how he
17 answers the points made by Ms Mitchell and Mr Dawson.

18 **Submissions on behalf of the Scottish Government by**

19 **MR MITCHELL KC**

20 **MR MITCHELL:** Good afternoon, my Lady. I appear on behalf
21 of the Scottish Government today. We have prepared
22 a written submission, which I'm sure my Lady has seen,
23 so I don't propose to go through that. I'm very
24 grateful to my learned friend Mr Dawson, Counsel to the
25 Inquiry, for his narrative.

67

1 representing other bereaved families in the UK are being
2 placed front and centre of this Inquiry.

3 The Scottish Covid Bereaved and their
4 representatives wish to hear the evidence of both
5 Inquiries, of course, and, where it's necessary for
6 the hearings to take place at the same time, members of
7 the Scottish Covid Bereaved and their representatives
8 will require, as it were, to play catch-up using
9 recordings of hearings. That can't be said to be
10 an approach which places families front and centre, and
11 we are grateful that every possible effort is being made
12 to avoid hearing clashes.

13 In conclusion, my Lady, the evidence thus far at
14 the UK Inquiry raises serious questions as to the UK and
15 Scottish Government's preparedness for a pandemic;
16 the extent to which the machinery of UK Government
17 during the critical early stages of the pandemic allowed
18 for the involvement of the Scottish Government; whether
19 the data reflected the four nations of the UK or just
20 England; whether attendance at crucial meetings by
21 Scottish Government ministers, civil servants and
22 scientists were simply a charade; and whether COBR
23 meetings were actually what has been described as
24 a Potemkin village, where the devolved administrations
25 were operating under the false belief that they were

66

1 There are a few points that I would like to comment
2 upon. I don't take issue at all with what he says, so
3 much I will attempt to give a slightly different
4 perspective on what he has described.

5 Since late 2022, the Scottish Government has been
6 providing both documents and statements to the Inquiry.
7 Since July 2023, the 2A solicitors team and the
8 Scottish Government have had fortnightly meetings at
9 which the arrangement for delivery and identification of
10 documents for the Inquiry has been discussed. I don't
11 think I would be contradicted if I were to say that
12 these meetings have been very productive and very
13 helpful, and the result is a huge volume of material
14 that has been provided by the Scottish Government to
15 the Inquiry: thousands of documents; 25 corporate
16 statements; and ultimately there will be approximately
17 89 or so witness statements.

18 The size of the task truly can't be underestimated.
19 The Rule 9s, as my Lady knows, were extremely detailed,
20 and the statements produced in consequence are also very
21 detailed. This has been a real challenge for those
22 working within government and outwith government to
23 complete.

24 The detail plainly needs to be there if the Inquiry
25 is to get through all the witnesses that it proposes

68

1 within the timeframe, and of course, as a result, much
2 evidence will have to be written and the
3 Scottish Government completely understands that. We
4 will continue to work together until January. The point
5 I'm coming to is that a great deal of good work has been
6 done and we recognise that a lot of work remains to be
7 done. Therefore, if statements lack detail, then we
8 will ensure that they are as full as they can be; we
9 will provide the messages that have been asked for; we
10 sought the Rule 21 request in order to cover
11 the possibility that there may be sensitive personal
12 data within that; and the issue of LPP, as my Lady
13 knows, is in the process of being resolved.

14 Time is marching on, but we will do our utmost to
15 help. The Scottish Government has placed itself at
16 the service of the Inquiry. It has no reason whatsoever
17 to be uncooperative or slow to respond, and I am here
18 today to remind the Inquiry of those very facts.

19 Let me turn to the issue of messages, informal
20 messaging, and Scottish Government policy in that
21 respect.

22 This ought to become crystal clear when
23 core participants see the corporate statement that has
24 been provided by the director-general of corporate,
25 which goes into some detail on this.

69

1 corporate record had to be transferred to the eRDM
2 system.

3 In August of 2021 and in March 2022, directors and
4 deputy directors within the government were reminded of
5 the importance of ensuring material relevant to
6 the Inquiries should be retained and stored on
7 the corporate record.

8 There is of course, in what I've described,
9 an element of personal judgement as to what falls -- as
10 to what is important and what should be retained. But
11 it is not difficult to understand, I would submit, why
12 the culture of using these informal platforms for
13 significant matters is not widespread within the
14 Scottish Government, for they have to be moved from the
15 informal messages onto an email and then into the
16 corporate record. It is far easier, in the first place,
17 to put them onto an email which automatically goes into
18 the corporate record.

19 I don't think I really wish to say a great deal
20 more, my Lady.

21 A good deal of work, as I said at the outset, has
22 been done. We recognise that work remains to be done.
23 The Scottish Government is aware, and could not fail to
24 be aware, of the need to make rapid progress in these
25 areas that have been described by Mr Dawson. As I said

71

1 In brief, the Inquiry is seeking messages that
2 contain decisions, messages that contain discussions
3 around decisions, groups created on messaging platforms,
4 dealing with matters such as logistics relating to
5 the Covid response, and messages themselves created on
6 these groups.

7 I cannot speak for other governments but, within
8 the Scottish Government, these informal platforms are
9 not used for decision-making. The process of making
10 decisions, that is the way in which decisions were made,
11 are mostly found in email exchanges. These were saved
12 to the document management system that within
13 Scottish Government is referred to as eRDM, electronic
14 record document management. That was and is the culture
15 within the Scottish Government. It is not part of
16 the Scottish Government's culture to use informal
17 platforms for those purposes. It does not mean that
18 these messaging platforms were not used at all. They
19 were used for informal communications, what might be
20 referred as to transient messages or purposes such as,
21 for example, alerting staff out of hours to the fact
22 that they're required to look at an email. Should they
23 contain important data, then the Scottish Government had
24 a clear policy that, regardless of the format in which
25 such data was contained, information relevant to the

70

1 at the outset, a major reason for me coming here today
2 was to assure you of the Scottish Government's
3 bona fides in that respect and in respect of all
4 matters.

5 My Lady has tools at disposal and she may decide
6 that she needs to use them. Perhaps my reassurance
7 today has -- perhaps my words today have reassured her
8 that she may not need to use those tools, but the
9 government will comply with everything that is required,
10 that is asked of them.

11 Thank you.

12 **LADY HALLETT:** Thank you very much, Mr Mitchell.

13 Mr Dawson, anything by way of closing?

14 **MR DAWSON:** No, thank you, my Lady. Other than to thank my
15 learned friends for their submissions, there is nothing
16 further I can usefully add.

Closing remarks by THE CHAIR

18 **LADY HALLETT:** Thank you very much, Mr Dawson.

19 Over the months since this Inquiry started, I've
20 received many words of support for the work of
21 the Inquiry from various bodies and individuals and, as
22 Mr Dawson has made plain, it's time for words to be put
23 into action.

24 Obviously it will not surprise anyone to learn that
25 I am very concerned about the difficulties that the

72

1 Module 2A team have encountered in obtaining the
 2 material they need to ensure a thorough and rigorous
 3 analysis of key decision-making in Scotland during the
 4 worst stages of the pandemic.
 5 I do understand the burden that we place upon
 6 material providers, both the UK Inquiry and of course
 7 the Scottish Inquiry, and that all those burdens come on
 8 top of their day job.
 9 I don't underestimate the difficulties and I accept
 10 assurances that intentions are good but, as I've said,
 11 intentions must be put into action.
 12 I've made plain many times that this Inquiry has
 13 a strict and ambitious timetable, and my reasons have
 14 also been made clear many times. To my mind, they are
 15 excellent reasons for that timetable, which is
 16 essentially that the public get the answers that they
 17 are seeking, they deserve, and that if possible this
 18 Inquiry can make recommendations that may reduce
 19 suffering in any future national emergency or UK-wide
 20 emergency of the kind that we suffered during the worst
 21 stages of the pandemic.
 22 Because I am determined to stick to that strict
 23 timetable, the hearings in 2A will take place in
 24 January 2024. They will not be postponed. If I were to
 25 postpone them, then all the work in other modules of

1 happens, will be in January.
 2 **MR DAWSON:** That's right, my Lady.
 3 **LADY HALLETT:** Thank you all very much indeed for your
 4 attendance, both here and online, and for all the
 5 submissions that I have received. I'm very grateful.
 6 Thank you.
 7 **(12.28 pm)**
 8 **(The hearing concluded)**

1 this Inquiry would be adversely impacted.
 2 So the hearings will take place, and all those who
 3 have not yet complied with the reasonable demands of the
 4 Module 2A team should be aware that I will not hesitate
 5 to use my statutory powers, and soon, to ensure that the
 6 Module 2A team can conduct a thorough and effective
 7 analysis of the issues as they relate to Scotland, the
 8 key decision-making in Scotland.
 9 As has been said before by others, the people of
 10 Scotland, the bereaved of Scotland expect a rigorous and
 11 effective analysis, they deserve a rigorous and
 12 effective analysis, and we will do our utmost to ensure
 13 that they get one.
 14 With those comments, I hope that the expressions of
 15 assurance I've heard from Mr Mitchell, and of course
 16 other bodies affected by some of Mr Dawson's remarks,
 17 will be put into action.
 18 I should also say, by way of closing, that I have
 19 of course read very carefully all the submissions that
 20 have been submitted in writing and I am grateful to all
 21 of those who have made such submissions, even if they
 22 have not obviously complemented those submissions by
 23 giving oral submissions this morning.
 24 So I'm very grateful to everybody. I think the next
 25 hearing for this module, unless anything unexpected

INDEX		PAGE
1		
2		
3	Statement by LEAD COUNSEL TO THE	1
4	INQUIRY FOR MODULE 2A	
5		
6	Submissions on behalf of Scottish	54
7	Covid Bereaved by	
8	MS MITCHELL KC	
9		
10	Submissions on behalf of the	67
11	Scottish Government by	
12	MR MITCHELL KC	
13		
14	Closing remarks by THE CHAIR	72
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

LADY HALLETT: [8] 1/3 53/10 53/19 54/6 67/14 72/12 72/18 75/3 MR DAWSON: [4] 1/12 53/20 72/14 75/2 MR MITCHELL: [1] 67/20 MS MITCHELL: [1] 54/10	16/21 19/15 28/18 37/25 54/17 60/22 68/5 71/3 2023 [14] 1/1 2/2 3/5 18/21 23/25 31/11 35/17 35/22 40/19 48/11 48/14 50/13 58/20 68/7 2024 [11] 1/8 3/25 4/9 5/12 37/21 40/21 42/12 49/3 49/24 51/5 73/24 21 [5] 23/20 27/18 62/5 62/11 69/10 21 March 2023 [1] 2/2 23 individual [1] 33/22 24 August 2021 [1] 60/22 25 corporate [1] 68/15 26 [1] 1/1 26 finalised [1] 33/15 28 finalised [1] 33/16 28 July 2023 [1] 48/11 29 June 2023 [1] 18/21 2A [86] 2B [2] 38/1 44/21 2C [2] 38/1 44/21 2s [2] 8/1 34/4	70 draft [1] 33/14 70 witnesses [1] 25/21 8 89 [1] 68/17 9 9 March [1] 46/18 9 October [3] 7/21 29/23 45/17 9s [4] 12/15 27/18 35/16 68/19 A Aamer [1] 58/23 Aamer Anwar [1] 58/23 abide [1] 18/24 ability [1] 53/3 able [7] 3/18 4/23 13/14 50/16 57/17 65/16 67/10 about [36] 2/12 6/4 6/23 10/25 12/19 13/6 14/17 15/12 15/16 17/14 18/2 18/16 19/12 21/5 21/25 22/5 22/21 24/2 24/11 24/21 25/18 27/7 27/23 28/3 39/20 40/23 41/11 41/18 41/21 47/16 48/1 49/12 57/7 58/22 64/22 72/25 above [2] 32/11 59/7 absolutely [2] 19/4 20/10 academic [1] 10/23 accelerate [1] 28/24 accept [2] 57/15 73/9 access [8] 19/14 26/20 28/10 31/17 36/15 36/25 46/11 62/24 accessible [2] 4/6 4/12 accommodation [1] 65/19 accordance [5] 5/25 14/3 19/24 20/4 46/24 accorded [1] 43/5 accordingly [2] 35/17 58/16 account [5] 5/23 13/1 31/23 57/23 63/5 accountability [2] 59/17 60/1 accurate [1] 57/23 achieve [3] 39/16 52/20 53/5 acknowledges [1] 14/12 across [6] 34/21 35/2	35/24 47/17 48/17 49/12 act [4] 23/20 24/3 60/7 60/11 action [3] 72/23 73/11 74/17 actions [1] 60/2 activities [1] 9/22 activity [2] 48/25 54/2 actually [2] 9/8 66/23 acutely [1] 20/13 add [3] 3/18 29/2 72/16 addition [9] 6/9 9/25 17/1 18/14 34/20 43/7 49/17 51/16 51/22 additional [3] 17/12 31/5 40/10 Additionally [1] 11/9 address [9] 3/15 3/16 5/3 12/11 14/21 16/2 16/10 23/21 55/15 addressed [7] 8/19 12/24 21/6 38/4 38/12 54/13 56/1 addressing [1] 33/4 adduced [1] 47/2 adequate [1] 52/15 adhered [1] 13/10 administered [1] 22/19 administrations [4] 45/6 45/14 57/3 66/24 administrative [5] 1/20 17/23 19/25 54/16 56/21 adopted [3] 21/16 43/9 62/9 advance [5] 6/1 31/1 40/9 43/14 56/6 advantages [1] 32/12 adversely [1] 74/1 advertising [3] 48/22 49/6 51/23 advice [13] 8/15 18/9 18/9 21/2 23/5 31/24 31/25 32/1 32/8 42/20 63/6 63/8 63/9 advisers [5] 8/22 11/19 21/2 41/1 56/20 advisory [9] 8/13 10/4 10/5 11/22 18/10 33/13 34/5 34/10 39/14 affairs [2] 9/18 26/10 affected [3] 12/22 48/16 74/16 affecting [2] 57/16 64/1 afford [1] 3/23 after [5] 3/18 9/13 31/10 44/7 61/4 afternoon [1] 67/20	Again [1] 25/16 against [2] 12/10 28/6 ago [1] 30/5 agreed [6] 34/25 43/2 44/23 50/21 51/8 51/22 ahead [2] 14/7 42/13 Ailsa [1] 45/10 aim [1] 52/20 aimed [1] 48/25 alerting [1] 70/21 Alex [3] 46/5 46/6 46/16 Alex Thomas [2] 46/5 46/6 Alex Thomas' [1] 46/16 Alister [1] 12/3 Alister Jack [1] 12/3 all [47] 2/11 6/6 12/15 12/16 14/21 16/1 16/2 16/10 17/17 21/10 27/12 29/17 31/22 31/24 32/19 34/7 34/9 35/2 35/20 37/15 38/14 39/25 40/8 41/10 42/7 51/2 53/2 55/15 56/1 61/8 61/12 62/3 63/5 63/6 65/23 67/8 68/2 68/25 70/18 72/3 73/7 73/25 74/2 74/19 74/20 75/3 75/4 alleged [1] 59/22 allocation [1] 20/1 allow [7] 2/7 4/5 4/18 6/22 56/4 63/14 64/3 allowed [3] 7/2 59/15 66/17 allowing [1] 42/25 along [3] 1/15 9/17 16/21 alongside [2] 25/5 37/25 already [11] 15/22 22/16 33/1 37/1 37/7 41/3 47/21 59/17 59/20 64/14 64/16 also [40] 2/21 3/9 8/18 8/20 8/21 10/25 11/3 11/7 11/18 11/22 17/25 18/16 20/7 22/2 22/8 22/17 27/6 32/4 33/24 34/2 37/18 39/17 40/10 41/5 45/20 46/4 46/21 51/22 52/12 52/15 52/25 55/3 58/7 58/10 58/19 64/9 65/25 68/20 73/14 74/18 although [4] 26/3 26/17 39/25 50/25 always [1] 51/1
1 1 March [1] 59/11 1 November 2022 [1] 2/2 1,000 questions [1] 12/14 10 [1] 59/23 10 October [1] 46/16 10.30 [1] 1/2 103 detailed [1] 55/9 103 requests [1] 11/12 11 October [1] 45/9 11 separate [1] 35/24 11.40 am [1] 53/16 11.55 [1] 53/15 11.55 am [1] 53/18 12 May [1] 38/5 12.28 pm [1] 75/7 13 June 2023 [1] 48/14 13 October [2] 46/17 47/13 137 [1] 25/3 14 August [1] 31/14 14 July [1] 9/12 140 [2] 8/4 55/9 15 [1] 33/12 15 initial [1] 34/4 16 [1] 33/24 16 January 2024 [3] 3/25 40/21 42/12 16 questionnaires [1] 8/12 19 [20] 1/22 8/8 8/13 10/5 10/7 10/20 10/25 11/15 11/22 13/16 17/8 18/10 21/13 21/23 24/15 45/3 45/15 53/8 54/16 59/19 1958 [1] 60/12	3 3 August 2023 [1] 31/11 31,553 documents [1] 33/11 36 corporate [1] 33/22 4 4 June 2023 [1] 58/20 5 5 October 2023 [1] 23/25 52 [1] 34/2 53 [1] 33/11 57 notebooks [2] 31/3 57/21 59 [1] 33/21 6 62 draft [1] 33/14 66 requests [1] 8/6 7 7 June 2023 [1] 50/13 7,221 documents [2] 33/19 35/23	70 draft [1] 33/14 70 witnesses [1] 25/21 8 89 [1] 68/17 9 9 March [1] 46/18 9 October [3] 7/21 29/23 45/17 9s [4] 12/15 27/18 35/16 68/19 A Aamer [1] 58/23 Aamer Anwar [1] 58/23 abide [1] 18/24 ability [1] 53/3 able [7] 3/18 4/23 13/14 50/16 57/17 65/16 67/10 about [36] 2/12 6/4 6/23 10/25 12/19 13/6 14/17 15/12 15/16 17/14 18/2 18/16 19/12 21/5 21/25 22/5 22/21 24/2 24/11 24/21 25/18 27/7 27/23 28/3 39/20 40/23 41/11 41/18 41/21 47/16 48/1 49/12 57/7 58/22 64/22 72/25 above [2] 32/11 59/7 absolutely [2] 19/4 20/10 academic [1] 10/23 accelerate [1] 28/24 accept [2] 57/15 73/9 access [8] 19/14 26/20 28/10 31/17 36/15 36/25 46/11 62/24 accessible [2] 4/6 4/12 accommodation [1] 65/19 accordance [5] 5/25 14/3 19/24 20/4 46/24 accorded [1] 43/5 accordingly [2] 35/17 58/16 account [5] 5/23 13/1 31/23 57/23 63/5 accountability [2] 59/17 60/1 accurate [1] 57/23 achieve [3] 39/16 52/20 53/5 acknowledges [1] 14/12 across [6] 34/21 35/2	35/24 47/17 48/17 49/12 act [4] 23/20 24/3 60/7 60/11 action [3] 72/23 73/11 74/17 actions [1] 60/2 activities [1] 9/22 activity [2] 48/25 54/2 actually [2] 9/8 66/23 acutely [1] 20/13 add [3] 3/18 29/2 72/16 addition [9] 6/9 9/25 17/1 18/14 34/20 43/7 49/17 51/16 51/22 additional [3] 17/12 31/5 40/10 Additionally [1] 11/9 address [9] 3/15 3/16 5/3 12/11 14/21 16/2 16/10 23/21 55/15 addressed [7] 8/19 12/24 21/6 38/4 38/12 54/13 56/1 addressing [1] 33/4 adduced [1] 47/2 adequate [1] 52/15 adhered [1] 13/10 administered [1] 22/19 administrations [4] 45/6 45/14 57/3 66/24 administrative [5] 1/20 17/23 19/25 54/16 56/21 adopted [3] 21/16 43/9 62/9 advance [5] 6/1 31/1 40/9 43/14 56/6 advantages [1] 32/12 adversely [1] 74/1 advertising [3] 48/22 49/6 51/23 advice [13] 8/15 18/9 18/9 21/2 23/5 31/24 31/25 32/1 32/8 42/20 63/6 63/8 63/9 advisers [5] 8/22 11/19 21/2 41/1 56/20 advisory [9] 8/13 10/4 10/5 11/22 18/10 33/13 34/5 34/10 39/14 affairs [2] 9/18 26/10 affected [3] 12/22 48/16 74/16 affecting [2] 57/16 64/1 afford [1] 3/23 after [5] 3/18 9/13 31/10 44/7 61/4 afternoon [1] 67/20	Again [1] 25/16 against [2] 12/10 28/6 ago [1] 30/5 agreed [6] 34/25 43/2 44/23 50/21 51/8 51/22 ahead [2] 14/7 42/13 Ailsa [1] 45/10 aim [1] 52/20 aimed [1] 48/25 alerting [1] 70/21 Alex [3] 46/5 46/6 46/16 Alex Thomas [2] 46/5 46/6 Alex Thomas' [1] 46/16 Alister [1] 12/3 Alister Jack [1] 12/3 all [47] 2/11 6/6 12/15 12/16 14/21 16/1 16/2 16/10 17/17 21/10 27/12 29/17 31/22 31/24 32/19 34/7 34/9 35/2 35/20 37/15 38/14 39/25 40/8 41/10 42/7 51/2 53/2 55/15 56/1 61/8 61/12 62/3 63/5 63/6 65/23 67/8 68/2 68/25 70/18 72/3 73/7 73/25 74/2 74/19 74/20 75/3 75/4 alleged [1] 59/22 allocation [1] 20/1 allow [7] 2/7 4/5 4/18 6/22 56/4 63/14 64/3 allowed [3] 7/2 59/15 66/17 allowing [1] 42/25 along [3] 1/15 9/17 16/21 alongside [2] 25/5 37/25 already [11] 15/22 22/16 33/1 37/1 37/7 41/3 47/21 59/17 59/20 64/14 64/16 also [40] 2/21 3/9 8/18 8/20 8/21 10/25 11/3 11/7 11/18 11/22 17/25 18/16 20/7 22/2 22/8 22/17 27/6 32/4 33/24 34/2 37/18 39/17 40/10 41/5 45/20 46/4 46/21 51/22 52/12 52/15 52/25 55/3 58/7 58/10 58/19 64/9 65/25 68/20 73/14 74/18 although [4] 26/3 26/17 39/25 50/25 always [1] 51/1

A	appropriate [4] 13/15 27/22 35/2 51/11	30/4 32/5 32/9 32/25 36/8 36/13 38/2 39/1 39/5 39/22 40/20 42/12 43/6 45/8 45/17 45/22 46/10 46/15 47/10 47/12 47/24 48/5 48/7 48/25 49/23 49/23 50/15 51/7 53/15 54/3 54/13 54/14 54/24 56/13 57/25 59/8 59/10 59/23 62/1 62/8 66/6 66/13 66/20 68/2 68/8 69/15 70/18 70/22 71/21 72/1 72/5	71/24 74/4	Bethany [1] 1/15 Bethany Condron [1] 1/15
am [11] 1/2 1/13 24/17 53/1 53/16 53/18 65/16 69/17 72/25 73/22 74/20	appropriately [1] 15/19	at present [1] 23/9	awareness [1] 49/1 away [2] 19/20 56/2	better [1] 13/7 between [13] 6/10 18/6 21/1 32/23 39/8 45/13 50/7 50/11 50/22 52/3 54/17 60/21 65/20
ambitious [2] 13/11 73/13	approximately [1] 68/16	attack [1] 59/12	back [2] 53/13 53/15	billboards [1] 48/22
amenable [1] 32/15	April [3] 28/18 54/17 60/22	attempt [1] 68/3	background [4] 28/6 42/16 42/25 43/3	bodies [7] 10/13 11/12 14/1 21/23 60/12 72/21 74/16
amongst [3] 9/19 11/13 39/4	April 2022 [3] 28/18 54/17 60/22	attempted [2] 13/2 13/4	balance [2] 9/9 44/10	Body [1] 10/16
amount [1] 26/17	are [87]	attempts [2] 38/11 63/14	balanced [1] 12/10	bona [1] 72/3
analysed [4] 8/9 9/5 12/5 18/12	areas [4] 5/3 7/3 42/15 71/25	attend [2] 4/23 57/17	Bar [1] 1/16	bona fides [1] 72/3
analysing [1] 45/4	aren't [1] 56/10	attendance [3] 4/13 66/20 75/4	based [4] 12/20 32/20 63/20 65/3	border [2] 55/2 55/3
analysis [7] 9/13 49/7 52/7 73/3 74/7 74/11 74/12	arising [3] 39/14 40/16 48/1	attended [2] 6/20 50/15	basis [7] 8/18 9/14 22/10 29/11 34/20 38/17 67/5	Boris [1] 58/11
announced [3] 42/10 49/15 60/23	around [5] 12/14 23/4 25/21 54/3 70/3	attention [3] 12/23 29/1 37/2	BBC [1] 58/20	both [21] 6/2 11/6 13/24 25/18 35/11 36/20 38/25 43/23 50/2 50/7 50/14 51/10 51/14 51/19 51/25 59/13 65/17 66/4 68/6 73/6 75/4
another [1] 61/25	arrangement [1] 68/9	attitude [1] 62/1	BBC Scotland's [1] 58/20	break [3] 44/6 53/12 53/17
answer [2] 15/8 31/8	arrangements [1] 39/15	attitudes [1] 57/2	be [191]	breaking [1] 59/22
answered [3] 13/25 15/6 55/11	arrived [2] 22/11 57/25	Audit [2] 10/22 34/16	bear [1] 39/17	brief [1] 70/1
answering [1] 15/14	as [137]	Audit Scotland [2] 10/22 34/16	because [3] 58/18 58/19 73/22	briefly [1] 62/18
answers [3] 67/10 67/17 73/16	As I said [1] 71/25	augment [1] 24/12	become [3] 20/15 24/5 69/22	Brightling [2] 47/9 47/17
Anwar [1] 58/23	ascertain [3] 8/14 25/12 58/7	August [4] 31/11 31/14 60/22 71/3	been [131]	bring [1] 28/25
any [32] 1/7 1/8 6/25 15/21 19/1 23/24 25/14 30/3 31/25 31/25 32/4 33/7 37/5 39/20 40/5 40/15 40/15 50/16 57/10 57/19 57/22 58/1 58/5 58/5 58/5 58/8 61/4 61/6 62/3 63/7 63/7 73/19	ask [8] 25/19 40/5 43/22 58/3 58/3 58/7 61/14 62/6	authorities [2] 60/4 60/8	before [10] 2/11 14/19 20/5 24/1 36/2 43/18 60/15 61/10 63/17 74/9	build [1] 48/15
asked [16] 8/15 11/3 15/16 19/2 30/17 30/24 38/6 38/23 43/21 58/22 59/2 59/5 61/15 65/8 69/9 72/10	asks [1] 25/9	auto [3] 58/13 60/18 61/5	beginning [2] 49/3 49/24	building [1] 56/24
aspects [4] 14/17 37/10 43/2 48/6	assess [1] 36/1	auto-delete [3] 58/13 60/18 61/5	behalf [18] 2/16 2/20 2/22 2/25 3/2 3/6 3/8 3/15 3/17 26/23 30/8 41/18 54/8 67/12 67/18 67/20 76/6 76/10	burden [2] 17/23 73/5
assessment [4] 19/23 19/23 22/10 25/3	assessment [4] 19/23 19/23 22/10 25/3	automatically [1] 71/17	being [29] 4/8 10/8 12/5 14/5 17/13 18/12 18/17 23/14 24/20 31/4 31/13 42/17 43/10 43/11 43/23 50/9 50/23 55/3 57/24 62/1 62/10 62/13 64/14 65/1 66/1 66/11 67/2 67/4 69/13	business [2] 4/18 21/19
assist [3] 37/1 57/19 58/1	assist [3] 37/1 57/19 58/1	availability [2] 25/14 26/9	belief [1] 66/25	but [22] 13/16 13/20 17/25 21/10 21/14 22/1 22/2 22/8 29/10 38/19 39/17 58/19 59/1 64/19 65/21 65/23 67/1 69/14 70/7 71/10 72/8 73/10
assistance [4] 10/6 11/1 67/8 67/9	assistance [4] 10/6 11/1 67/8 67/9	available [8] 6/13 36/10 47/24 48/18 53/24 55/2 55/3 60/5	believe [2] 30/9 59/25	Bécares [1] 47/4
assisting [2] 25/11 36/7	assimilate [1] 10/24	avoid [12] 40/6 50/10 50/20 50/22 51/2 51/5 51/25 65/11 65/21 65/22 65/23 66/12	benefit [1] 7/11	C
associated [2] 18/9 38/1	assist [3] 37/1 57/19 58/1	avoidance [4] 22/4 28/7 41/9 41/15	bereaved [23] 2/17 3/16 20/20 30/8 40/22 54/8 54/20 54/21 55/11 57/14 59/14 59/25 63/13 64/10 64/24 65/24 66/1 66/3 66/7 67/11 67/13 74/10 76/7	C Saatchi [1] 49/5
assurance [1] 74/15	assurance [1] 74/15	awaiting [1] 39/23	bespoke [1] 6/24	Cabinet [3] 11/17 18/8 42/6
assurances [1] 73/10	assurances [1] 73/10	awarded [2] 49/5 49/7	best [3] 44/9 53/3 53/12	Cabinet Secretaries [1] 11/17
assure [1] 72/2	assure [1] 72/2	aware [16] 19/18 20/13 20/21 20/25 35/7 36/12 37/24 44/5 48/20 56/1 56/17 63/15 64/24 71/23		Cairney [1] 45/21
assured [3] 19/12 29/12 53/1	assured [3] 19/12 29/12 53/1			Calderwood [1] 11/20
astonished [1] 57/5	astonished [1] 57/5			call [3] 40/12 48/9 63/24
at [75] 2/5 2/15 3/11 4/1 4/6 4/9 4/21 5/25 6/5 8/24 11/15 11/19 13/15 13/21 15/11 16/12 16/12 21/20 22/11 22/23 23/9 23/17 24/24 25/18	at [75] 2/5 2/15 3/11 4/1 4/6 4/9 4/21 5/25 6/5 8/24 11/15 11/19 13/15 13/21 15/11 16/12 16/12 21/20 22/11 22/23 23/9 23/17 24/24 25/18			called [6] 40/10

C	<p>charities [1] 48/23</p> <p>checks [1] 30/18</p> <p>Chiefs' [2] 3/1 34/14</p> <p>Children [2] 10/22 34/14</p> <p>Chris [1] 47/9</p> <p>Christmas [1] 44/6</p> <p>chronology [1] 42/18</p> <p>circulated [4] 7/20 38/4 43/17 45/23</p> <p>circumstances [2] 28/4 35/18</p> <p>civil [7] 11/22 56/19 58/3 60/16 60/25 66/21 67/8</p> <p>claim [1] 26/14</p> <p>claims [1] 32/17</p> <p>Claire [1] 2/16</p> <p>Clare [1] 47/5</p> <p>clarification [2] 26/12 53/21</p> <p>clarity [6] 15/15 21/7 23/22 25/17 27/23 38/12</p> <p>clash [2] 50/22 51/6</p> <p>clashes [7] 50/10 50/21 51/2 65/21 65/23 65/24 66/12</p> <p>clean [1] 51/16</p> <p>clear [15] 13/22 16/1 18/3 22/7 22/13 23/8 26/2 30/24 43/19 46/21 60/12 61/18 69/22 70/24 73/14</p> <p>clearly [3] 13/8 28/17 44/1</p> <p>clients [1] 2/24</p> <p>close [1] 13/17</p> <p>closed [1] 38/16</p> <p>closing [5] 43/6 72/13 72/17 74/18 76/14</p> <p>co [12] 5/16 9/21 14/16 39/2 49/25 50/11 52/2 52/16 61/24 65/14 65/19</p> <p>co-operating [1] 61/25</p> <p>co-operation [9] 5/16 14/16 49/25 50/11 52/2 52/16 61/24 65/14 65/19</p> <p>co-ordinate [1] 39/2</p> <p>co-ordination [1] 9/21</p> <p>COBR [1] 66/22</p> <p>code [2] 60/7 60/12</p> <p>come [6] 12/5 17/6 30/23 53/13 57/22 73/7</p> <p>comes [1] 65/9</p> <p>coming [3] 65/19 69/5 72/1</p>	<p>commemoration [2] 5/14 48/10</p> <p>commence [2] 14/20 42/11</p> <p>commenced [1] 15/22</p> <p>commencement [2] 54/24 61/10</p> <p>commencing [2] 3/24 40/21</p> <p>comment [2] 45/24 68/1</p> <p>comments [5] 38/6 38/7 52/5 55/4 74/14</p> <p>Commission [1] 11/2</p> <p>commissioned [3] 45/20 46/1 46/4</p> <p>Commissioner [2] 10/23 34/15</p> <p>Commissioner for [2] 10/23 34/15</p> <p>commitment [2] 4/5 18/22</p> <p>common [1] 51/9</p> <p>communicate [2] 21/11 50/20</p> <p>communicated [1] 22/8</p> <p>communication [4] 18/16 21/1 21/11 58/11</p> <p>communications [7] 18/5 20/14 23/2 51/20 57/11 58/6 70/19</p> <p>community [1] 49/16</p> <p>Company [1] 58/23</p> <p>comparison [1] 45/6</p> <p>compel [2] 35/8 52/22</p> <p>competing [1] 52/1</p> <p>compilation [1] 24/18</p> <p>compiled [2] 9/16 22/17</p> <p>complemented [1] 74/22</p> <p>complete [5] 15/5 24/18 31/8 35/10 68/23</p> <p>completed [3] 14/11 30/2 32/16</p> <p>completely [1] 69/3</p> <p>complex [3] 13/25 30/11 30/12</p> <p>complexity [1] 12/11</p> <p>complied [4] 35/14 52/10 55/11 74/3</p> <p>comply [4] 35/18 60/9 62/12 72/9</p> <p>complying [1] 62/16</p> <p>component [1] 17/4</p> <p>comprehensive [2] 22/13 48/16</p> <p>comprised [1] 12/14</p>	<p>comprises [1] 19/7</p> <p>comprising [1] 18/8</p> <p>concern [1] 57/13</p> <p>concerned [6] 14/14 16/5 41/12 55/13 59/6 72/25</p> <p>concerns [2] 14/17 23/21</p> <p>concluded [2] 59/7 75/8</p> <p>concluding [1] 5/18</p> <p>conclusion [3] 29/7 59/9 66/13</p> <p>conclusions [1] 29/10</p> <p>Condron [1] 1/15</p> <p>conduct [1] 74/6</p> <p>conducted [3] 4/19 21/20 50/23</p> <p>conducting [2] 20/20 36/17</p> <p>Conference [3] 4/10 42/13 54/25</p> <p>confidence [2] 61/22 62/17</p> <p>confidentiality [1] 51/14</p> <p>confirm [3] 30/18 58/14 65/5</p> <p>conflicts [1] 57/2</p> <p>confusing [1] 52/2</p> <p>Congress [3] 3/12 3/12 34/16</p> <p>conjunction [2] 7/25 44/21</p> <p>connected [1] 24/15</p> <p>connection [8] 10/4 19/17 21/13 25/24 27/4 35/12 43/13 44/25</p> <p>consequence [2] 18/5 68/20</p> <p>consider [2] 58/15 61/12</p> <p>considerable [4] 14/11 15/2 17/22 19/12</p> <p>consideration [6] 33/5 38/8 44/9 46/4 47/24 64/17</p> <p>considerations [4] 31/22 39/13 47/22 63/5</p> <p>considered [10] 12/24 25/4 25/9 35/2 37/6 37/18 40/1 41/8 59/12 64/14</p> <p>considering [2] 27/17 28/5</p> <p>considers [1] 18/3</p> <p>consist [1] 33/22</p> <p>consistency [3] 39/4 39/16 51/11</p> <p>consistently [1]</p>	<p>12/10</p> <p>constrained [2] 31/16 62/22</p> <p>constraints [1] 64/18</p> <p>consultation [1] 44/8</p> <p>contacted [1] 11/3</p> <p>contacting [1] 40/14</p> <p>contain [3] 70/2 70/2 70/23</p> <p>contained [2] 32/8 70/25</p> <p>contemporaneous [2] 58/1 61/1</p> <p>contemporary [1] 56/19</p> <p>content [3] 20/14 27/25 32/9</p> <p>contents [1] 12/5</p> <p>context [2] 21/5 53/8</p> <p>continue [14] 7/1 12/5 26/21 29/13 30/17 31/8 34/19 36/9 44/16 49/21 50/5 50/20 52/4 69/4</p> <p>continued [2] 6/9 50/11</p> <p>contract [3] 49/5 49/7 49/14</p> <p>contradicted [1] 68/11</p> <p>contrary [1] 16/1</p> <p>contribute [5] 7/6 38/23 43/21 44/3 53/25</p> <p>contribution [2] 7/16 38/24</p> <p>contributions [1] 6/7</p> <p>controversies [1] 43/1</p> <p>convenience [1] 21/8</p> <p>Convention [3] 31/20 32/14 63/1</p> <p>conversations [1] 28/11</p> <p>copies [3] 22/3 51/15 51/16</p> <p>copy [2] 29/22 29/23</p> <p>core [80]</p> <p>core participant [11] 2/10 3/4 3/13 5/20 6/15 6/16 6/25 7/1 7/9 43/25 50/12</p> <p>core participants [58] 2/3 3/10 3/21 5/4 5/10 5/19 6/10 7/2 7/21 9/11 9/12 14/7 15/24 18/20 20/6 20/19 21/21 29/23 32/5 33/6 33/9 33/18 33/19 34/6 34/20 36/3 36/10 36/15 36/22 36/22 37/6 37/15 37/23 38/5 38/6 38/10 40/2 40/18 41/13</p>
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<p>C</p> <p>core participants... [19] 42/15 43/5 43/7 43/10 43/17 44/11 44/16 45/7 45/16 45/24 46/14 47/8 50/14 50/16 56/6 56/7 61/17 63/18 69/23 corner [1] 12/18 corporate [21] 8/25 9/15 10/9 10/15 11/6 16/22 17/10 19/17 21/21 22/14 24/10 24/17 33/15 33/22 68/15 69/23 69/24 71/1 71/7 71/16 71/18 corporations [1] 16/17 corresponded [1] 25/24 correspondence [1] 60/4 corridors [1] 63/22 COSLA [1] 10/18 could [9] 22/11 24/19 57/23 58/14 58/15 59/21 61/11 65/5 71/23 Council [2] 3/1 34/14 counsel [30] 1/6 1/11 1/14 1/16 6/20 9/14 12/6 12/17 18/13 20/8 30/4 36/21 43/4 43/22 54/11 55/7 55/19 56/11 57/4 57/10 57/12 62/2 62/4 62/20 63/2 63/24 64/6 64/8 67/24 76/3 countries [1] 45/6 country [2] 57/17 64/2 course [20] 13/6 15/18 31/7 37/4 44/18 45/24 52/3 53/24 54/18 55/13 55/24 61/1 64/17 64/19 66/5 69/1 71/8 73/6 74/15 74/19 court [1] 65/17 Courts [2] 10/17 34/17 cover [6] 7/4 38/24 42/24 48/6 60/21 69/10 covered [5] 7/25 38/13 42/17 44/24 47/18 covers [1] 47/21 Covid [58] 1/22 2/17 3/16 5/17 8/8 8/13 9/20 10/5 10/7 10/20 10/25 11/15 11/22 13/16 17/8 18/10 19/4</p>	<p>20/20 21/13 21/23 22/20 24/15 30/8 33/13 34/5 34/10 40/22 45/3 45/15 47/11 49/25 50/1 51/24 53/8 54/8 54/16 54/19 54/21 55/11 57/14 59/14 59/19 59/25 60/24 63/13 64/10 64/23 65/14 65/16 65/18 65/18 65/24 66/3 66/7 67/10 67/13 70/5 76/7 Covid Inquiry [2] 22/20 65/18 Covid-19 [18] 1/22 8/8 8/13 10/5 10/7 10/25 11/15 11/22 13/16 17/8 18/10 21/13 21/23 24/15 45/3 53/8 54/16 59/19 created [2] 70/3 70/5 criminal [2] 59/24 62/13 critical [4] 56/18 56/24 61/19 66/17 cross [2] 36/11 36/17 cross-modular [1] 36/11 Crown [1] 10/16 Crown Office [1] 10/16 crucial [3] 57/16 61/13 66/20 crystal [1] 69/22 crystal clear [1] 69/22 CTI [2] 30/4 55/19 CTI's [1] 60/18 culture [3] 70/14 70/16 71/12 current [8] 3/14 25/3 25/14 26/22 33/5 41/15 42/4 47/14 currently [4] 10/7 18/17 27/16 45/23</p> <p>D</p> <p>daily [1] 38/17 dairies [4] 29/15 29/17 30/19 56/24 Daniel [1] 2/22 data [11] 23/21 45/3 46/10 46/12 65/3 65/9 66/19 67/5 69/12 70/23 70/25 date [11] 11/12 32/19 33/10 34/7 43/19 48/19 60/25 61/4 62/6 62/9 65/2 dates [3] 35/9 40/4 40/5 David [1] 47/6 Dawson [13] 1/6 1/10</p>	<p>1/13 53/10 53/19 54/6 59/18 67/17 67/24 71/25 72/13 72/18 72/22 Dawson's [1] 74/16 day [2] 49/18 73/8 deadlines [2] 35/15 35/19 deal [4] 6/14 69/5 71/19 71/21 dealing [1] 70/4 dealt [2] 56/4 56/10 December [1] 35/22 December 2023 [1] 35/22 decide [1] 72/5 decided [1] 44/7 decision [32] 1/5 1/21 8/19 11/15 12/15 12/19 12/25 13/5 14/10 20/16 21/1 22/9 23/1 23/3 26/5 29/9 39/12 41/23 42/20 42/22 45/5 45/13 45/19 46/7 48/4 54/16 56/22 57/20 60/21 70/9 73/3 74/8 decision-makers [9] 8/19 11/15 12/15 12/25 14/10 21/1 23/1 23/3 26/5 decision-making [22] 1/5 1/21 12/19 13/5 20/16 22/9 29/9 39/12 41/23 42/20 42/22 45/5 45/13 45/19 46/7 48/4 54/16 57/20 60/21 70/9 73/3 74/8 decisions [30] 1/23 8/16 9/8 10/19 13/3 18/15 21/5 21/12 22/8 22/11 23/6 32/3 39/20 39/24 41/25 42/19 56/22 57/2 57/16 57/19 57/25 60/2 63/12 64/1 67/1 67/4 70/2 70/3 70/10 70/10 dedicated [1] 36/20 deem [1] 13/14 deemed [2] 27/21 38/16 deepest [1] 53/4 definition [1] 21/16 degree [1] 46/20 delay [4] 15/21 15/25 16/9 51/22 delays [4] 14/22 18/4 55/16 55/23 delete [3] 58/13 60/18 61/5 deleted [2] 26/13 27/10 deleting [2] 58/8 59/21</p>	<p>delighted [1] 64/8 deliver [3] 49/8 49/15 53/2 delivery [1] 68/9 demand [1] 39/18 demanding [2] 14/12 59/4 demands [1] 74/3 demonstrate [1] 51/17 department [2] 17/24 27/14 departments [1] 59/24 deputy [2] 42/5 71/4 described [5] 24/20 66/23 68/4 71/8 71/25 description [2] 31/25 63/7 deserve [5] 53/8 59/19 67/11 73/17 74/11 designed [3] 6/22 15/7 54/2 detail [10] 13/2 13/10 24/9 24/12 27/7 27/14 64/7 68/24 69/7 69/25 detailed [12] 5/23 7/5 8/20 9/7 11/10 24/11 26/11 38/3 54/12 55/9 68/19 68/21 details [8] 6/3 6/24 7/22 21/25 25/22 27/19 42/19 44/15 determined [1] 73/22 devolution [2] 39/14 45/12 devolved [4] 45/5 45/14 57/3 66/24 did [2] 24/5 28/23 differ [1] 39/7 differences [1] 39/18 different [6] 39/11 39/11 39/12 39/14 53/7 68/3 differs [1] 39/9 difficult [4] 30/9 57/14 57/22 71/11 difficulties [5] 14/24 40/15 55/20 72/25 73/9 digest [1] 30/12 digital [1] 48/22 directed [1] 46/18 director [2] 46/9 69/24 director-general [1] 69/24 directorates [5] 9/18 9/20 9/21 10/1 directorates [5] 9/2 9/16 14/13 16/19 17/7 directors [2] 71/3 71/4</p>	<p>Disability [1] 2/23 Disabled [2] 41/5 41/10 disappointed [2] 55/14 60/15 disclose [4] 30/3 34/22 37/5 56/6 disclosed [19] 9/10 9/12 14/6 15/24 16/8 20/6 29/22 32/4 33/18 34/6 35/24 37/15 37/17 37/17 45/7 45/15 46/13 47/7 56/17 disclosing [1] 63/17 disclosure [20] 5/9 17/1 17/13 17/16 17/18 18/19 19/8 23/18 28/12 33/8 33/20 34/19 34/21 35/21 36/11 37/10 37/12 59/12 62/6 62/17 discovery [3] 5/9 19/21 33/8 discrete [2] 16/5 64/22 discrimination [1] 46/23 discuss [4] 23/3 23/5 23/6 50/18 discussed [3] 32/23 50/9 68/10 discusses [1] 37/14 discussing [1] 21/2 discussion [1] 33/6 discussions [4] 18/15 27/13 31/10 70/2 displayed [1] 62/2 disposal [1] 72/5 disrupt [2] 14/25 55/21 disseminated [1] 6/23 do [22] 4/23 6/8 14/21 15/25 26/1 26/1 26/15 29/7 29/14 29/20 37/7 40/24 51/1 52/17 52/23 55/15 58/2 65/2 65/24 69/14 73/5 74/12 document [2] 70/12 70/14 documentary [11] 5/7 5/9 7/17 16/14 16/24 17/5 17/15 18/3 19/21 33/8 55/5 documentation [2] 11/8 14/3 documents [37] 11/4 14/23 17/3 17/9 18/8 18/14 18/19 19/14 19/16 20/2 20/5 20/6</p>
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<p>D</p> <p>documents... [25] 20/9 21/17 28/20 31/12 31/18 32/4 32/7 32/19 33/1 33/11 33/19 34/8 34/11 35/23 36/1 37/2 37/12 42/14 43/11 51/15 55/17 62/25 68/6 68/10 68/15</p> <p>does [2] 61/22 70/17</p> <p>Doherty [1] 3/8</p> <p>doing [6] 30/14 32/12 32/15 36/8 53/2 61/25</p> <p>don't [6] 64/7 67/23 68/2 68/10 71/19 73/9</p> <p>done [6] 36/9 58/13 69/6 69/7 71/22 71/22</p> <p>Dorland [2] 2/5 4/22</p> <p>Dorland House [2] 2/5 4/22</p> <p>doubt [6] 17/22 19/1 22/4 28/7 41/9 41/15</p> <p>Downing [1] 59/23</p> <p>Downing Street [1] 59/23</p> <p>Dr [3] 47/5 47/11 47/17</p> <p>Dr Clare Wenham [1] 47/5</p> <p>Dr Evans [1] 47/17</p> <p>Dr Rachael Evans [1] 47/11</p> <p>draft [12] 12/3 26/24 27/4 33/14 33/14 35/15 35/20 41/11 41/14 43/16 45/23 45/23</p> <p>drafted [2] 12/16 30/5</p> <p>drawing [1] 37/2</p> <p>drawn [1] 61/16</p> <p>drew [1] 12/22</p> <p>due [11] 3/23 13/5 17/22 31/7 37/4 39/11 43/18 44/18 45/24 55/25 64/18</p> <p>duplication [2] 50/10 65/21</p> <p>duration [2] 51/2 53/25</p> <p>during [9] 21/3 28/13 45/14 46/12 50/8 63/23 66/17 73/3 73/20</p>	<p>earlier [4] 16/16 35/23 53/22 61/1</p> <p>earliest [1] 62/8</p> <p>early [3] 3/24 54/17 66/17</p> <p>easier [1] 71/16</p> <p>Edinburgh [9] 4/3 4/10 4/12 10/21 10/24 42/11 42/12 45/11 50/13</p> <p>effective [3] 74/6 74/11 74/12</p> <p>effectively [1] 4/19</p> <p>effectiveness [1] 45/4</p> <p>efficiency [1] 30/15</p> <p>effort [1] 66/11</p> <p>efforts [6] 4/17 14/5 15/2 19/12 50/9 65/20</p> <p>Eight [1] 5/16</p> <p>either [7] 2/15 7/17 7/23 19/17 23/11 30/19 44/17</p> <p>electronic [3] 58/6 58/11 70/13</p> <p>element [2] 38/20 71/9</p> <p>elements [1] 15/16</p> <p>elsewhere [1] 67/2</p> <p>email [4] 70/11 70/22 71/15 71/17</p> <p>emails [1] 19/2</p> <p>emerge [1] 31/7</p> <p>emerged [1] 22/13</p> <p>emergency [3] 46/8 73/19 73/20</p> <p>employees [1] 41/1</p> <p>enable [4] 25/17 35/21 49/11 50/4</p> <p>encompass [1] 21/9</p> <p>encountered [2] 1/9 73/1</p> <p>encourage [1] 62/15</p> <p>encouragement [3] 52/15 52/20 56/15</p> <p>end [2] 9/1 49/4</p> <p>endeavour [3] 51/1 52/17 65/22</p> <p>enforcement [1] 39/15</p> <p>engage [2] 43/8 52/2</p> <p>engaged [1] 14/1</p> <p>engagement [3] 6/17 7/1 54/2</p> <p>England [2] 65/4 66/20</p> <p>English [1] 1/16</p> <p>enjoy [1] 50/5</p> <p>ensure [15] 4/18 14/5 15/7 19/1 27/19 36/15 39/3 50/5 51/11 55/1 61/7 69/8 73/2 74/5 74/12</p> <p>ensuring [1] 71/5</p>	<p>entitled [2] 15/18 26/15</p> <p>equally [1] 41/5</p> <p>eRDM [2] 70/13 71/1</p> <p>err [1] 40/13</p> <p>especially [1] 17/21</p> <p>essential [1] 64/3</p> <p>essentially [1] 73/16</p> <p>establish [1] 61/3</p> <p>establishing [1] 56/21</p> <p>et [1] 56/24</p> <p>et cetera [1] 56/24</p> <p>Evans [3] 34/25 47/11 47/17</p> <p>even [3] 28/15 67/3 74/21</p> <p>event [2] 50/15 56/9</p> <p>events [8] 4/16 13/16 13/19 42/19 49/11 49/14 49/16 54/1</p> <p>ever [2] 28/23 67/15</p> <p>every [17] 5/14 12/18 15/14 48/9 48/13 48/21 48/24 49/1 49/2 49/6 49/11 51/23 53/23 53/23 64/1 64/18 66/11</p> <p>everybody [1] 74/24</p> <p>everyone [2] 1/3 57/16</p> <p>everything [1] 72/9</p> <p>evidence [37] 5/7 7/15 7/18 8/5 12/13 12/20 13/15 16/14 26/22 29/11 36/12 36/13 37/4 39/22 40/20 41/17 42/2 43/10 43/13 43/16 43/19 44/23 46/19 46/22 47/1 47/15 47/21 47/23 48/1 48/7 55/6 56/18 64/19 65/6 66/4 66/13 69/2</p> <p>evidential [4] 3/23 4/2 5/2 52/18</p> <p>evidently [1] 12/12</p> <p>evolved [1] 25/16</p> <p>examine [1] 29/5</p> <p>examined [1] 39/10</p> <p>example [2] 28/10 70/21</p> <p>excellent [1] 73/15</p> <p>exception [2] 12/8 23/9</p> <p>exceptional [1] 35/17</p> <p>exchange [1] 59/7</p> <p>exchanges [1] 70/11</p> <p>excuse [1] 62/13</p> <p>exercise [3] 17/15 48/9 51/25</p> <p>exhibit [1] 16/23</p> <p>exhibits [10] 5/6 7/12 14/6 17/12 20/1 33/21</p>	<p>34/23 37/9 37/16 37/18</p> <p>exist [4] 25/25 26/1 29/5 58/2</p> <p>existed [3] 24/23 25/6 57/2</p> <p>existence [1] 59/8</p> <p>existing [1] 46/23</p> <p>exists [4] 13/13 60/3 65/8 65/20</p> <p>expect [2] 52/21 74/10</p> <p>expectation [1] 52/19</p> <p>expected [6] 15/3 17/20 27/22 38/25 41/24 43/20</p> <p>expects [4] 13/23 19/6 35/13 35/19</p> <p>expense [1] 13/21</p> <p>experiences [6] 41/18 48/13 48/14 49/13 49/20 65/3</p> <p>expert [13] 5/13 34/12 37/8 44/19 45/18 46/1 46/3 46/19 46/22 47/7 64/23 64/24 65/13</p> <p>expertise [1] 65/1</p> <p>experts [8] 44/22 46/13 46/20 46/24 47/2 47/15 47/20 58/12</p> <p>explain [3] 32/3 63/11 65/9</p> <p>explaining [2] 31/15 62/22</p> <p>explanation [2] 28/16 32/21</p> <p>explore [2] 16/11 56/12</p> <p>expressions [1] 74/14</p> <p>extension [1] 48/3</p> <p>extensions [1] 35/1</p> <p>extensive [3] 11/7 22/16 52/21</p> <p>extent [11] 16/9 17/22 20/7 22/5 25/7 27/5 31/22 39/17 41/11 63/4 66/16</p> <p>external [1] 9/18</p> <p>extremely [4] 12/17 53/11 60/15 68/19</p>	<p>failures [1] 13/5</p> <p>fairly [1] 24/19</p> <p>fairness [1] 39/3</p> <p>fall [1] 35/16</p> <p>falling [1] 7/4</p> <p>falls [1] 71/9</p> <p>false [1] 66/25</p> <p>families [2] 66/1 66/10</p> <p>far [8] 4/22 7/8 13/15 17/5 56/18 59/6 66/13 71/16</p> <p>Feedback [1] 9/13</p> <p>festive [1] 44/13</p> <p>few [3] 26/6 30/9 68/1</p> <p>fides [1] 72/3</p> <p>film [3] 5/15 48/10 49/17</p> <p>final [9] 32/7 39/20 39/24 44/7 45/7 45/16 46/14 47/25 52/5</p> <p>finalisation [1] 45/25</p> <p>finalised [4] 9/9 10/8 33/15 33/16</p> <p>finality [1] 38/21</p> <p>Finally [2] 5/18 61/14</p> <p>find [1] 58/2</p> <p>finding [1] 63/22</p> <p>fine [1] 62/14</p> <p>first [11] 1/25 5/19 17/17 18/21 19/8 27/2 42/3 42/4 42/5 49/18 71/16</p> <p>First Minister [5] 18/21 19/8 42/3 42/4 42/5</p> <p>firstly [2] 54/21 65/15</p> <p>Fiscal [1] 10/16</p> <p>five [4] 5/11 7/8 28/16 37/20</p> <p>fixed [1] 44/8</p> <p>flagged [1] 64/16</p> <p>focus [5] 1/22 41/24 43/1 62/14 65/7</p> <p>focusing [1] 40/25</p> <p>follow [1] 43/15</p> <p>following [6] 5/3 18/22 33/21 38/8 44/22 45/25</p> <p>follows [1] 37/15</p> <p>footnoted [2] 34/9 34/11</p> <p>Forbes [2] 11/17 34/24</p> <p>foreshadowed [1] 59/18</p> <p>form [10] 5/23 7/17 7/19 9/14 37/3 38/22 45/8 45/16 45/23 46/14</p> <p>formal [1] 61/15</p> <p>formally [3] 31/11 35/12 48/14</p>
(24) documents... - formally				

F	46/14 Gavin Freeguard [2] 46/5 46/9 Gavin Freeguard's [1] 46/14 gaze [1] 67/6 general [11] 17/13 17/15 17/17 17/18 28/11 33/8 33/20 34/21 37/10 47/16 69/24 generally [6] 7/14 9/5 17/1 17/4 25/18 26/6 Genevieve [1] 2/25 Geoffrey [1] 2/19 get [8] 9/9 13/2 19/14 50/4 59/4 68/25 73/16 74/13 give [10] 39/21 40/4 40/20 41/17 42/2 43/18 59/6 64/19 65/6 68/3 given [17] 6/6 6/25 14/18 16/1 32/1 38/20 40/9 44/9 44/10 61/18 62/5 62/7 63/8 64/14 64/16 64/17 65/13 giving [1] 74/23 go [2] 56/14 67/23 goes [2] 69/25 71/17 going [3] 5/2 24/3 65/13 gone [2] 17/20 64/6 good [7] 1/3 1/12 4/13 67/20 69/5 71/21 73/10 Gove [1] 12/2 government [124] Government's [11] 9/22 10/2 15/10 18/2 27/14 42/8 54/15 61/23 66/15 70/16 72/2 governmental [2] 20/23 48/1 governments [1] 70/7 gradual [4] 24/20 28/22 28/23 29/3 gradually [2] 25/17 30/23 granted [1] 3/4 grateful [16] 13/25 14/15 38/7 40/22 41/5 54/11 55/12 58/14 58/15 61/11 65/5 66/11 67/24 74/20 74/24 75/5 grave [1] 57/13 great [2] 69/5 71/19 Gregor [1] 11/20 Gregor Smith [1] 11/20 grounding [1] 49/19	grounds [1] 46/23 group [10] 6/25 8/13 10/5 10/24 11/22 18/10 33/14 33/24 34/5 34/10 groups [14] 2/10 5/20 7/9 8/6 10/4 12/21 22/6 24/15 24/23 25/2 25/22 58/5 70/3 70/6 guide [1] 38/23	H had [22] 9/2 10/10 15/6 15/16 15/17 16/6 24/13 29/4 30/6 31/18 32/20 36/25 40/24 50/17 52/15 55/24 58/23 61/20 64/14 68/8 70/23 71/1 hadn't [1] 64/16 Hale [2] 45/2 47/20 half [1] 28/16 handed [2] 19/4 19/5 handled [2] 15/19 23/14 hands [1] 25/6 happened [1] 63/22 happens [1] 75/1 happy [1] 54/25 hard [4] 12/17 14/14 29/23 52/11 hardship [1] 49/21 has [113] have [149] having [6] 15/23 31/17 40/24 58/1 62/23 65/12 he [4] 2/23 67/16 68/2 68/4 head [1] 46/9 headline [1] 58/22 health [10] 3/7 10/1 10/13 16/20 21/24 28/9 34/13 36/4 42/6 58/21 hear [5] 4/14 53/13 57/20 64/13 66/4 heard [3] 48/25 51/25 74/15 hearing [46] 1/4 1/25 2/3 2/5 2/15 3/5 3/11 3/14 4/1 4/11 5/1 5/22 6/1 6/5 6/8 8/24 11/10 15/11 23/17 25/19 31/2 33/2 33/3 38/2 39/1 40/5 40/20 42/9 43/8 44/3 45/9 45/17 46/15 47/12 50/10 50/21 50/23 52/8 53/7 54/13 54/24 59/10 65/23 66/12 74/25 75/8 hearings [52] 1/8 2/1	3/23 4/2 4/6 4/7 4/9 4/21 5/2 5/11 6/1 6/18 6/24 7/4 7/6 14/8 14/20 16/12 19/20 32/6 35/9 36/14 37/20 39/22 41/3 41/24 42/10 42/13 43/1 43/6 43/14 47/24 48/5 48/7 49/4 49/18 49/23 50/23 51/5 51/6 52/14 52/19 53/2 54/4 54/22 56/7 56/13 61/11 66/6 66/9 73/23 74/2 held [11] 12/25 22/24 24/24 27/25 28/1 28/2 29/20 30/19 31/4 57/7 62/3 help [6] 32/3 49/8 49/15 51/9 63/11 69/15 helpful [3] 53/11 64/11 68/13 helpfully [1] 51/4 helping [1] 48/15 hence [3] 20/8 36/23 36/23 Henderson [2] 45/10 47/19 her [6] 15/9 28/14 30/8 45/15 53/6 72/7 here [6] 2/5 4/21 58/13 69/17 72/1 75/4 hesitate [2] 52/23 74/4 hide [1] 63/21 high [1] 26/9 highlighted [2] 28/19 57/4 him [2] 15/9 18/23 his [6] 2/24 55/7 55/19 55/20 62/2 67/25 history [1] 62/5 hold [1] 29/20 holding [1] 49/13 Holyrood [1] 63/21 hope [10] 13/6 28/19 28/25 52/6 52/14 52/19 52/20 52/23 64/15 74/14 hoped [1] 51/18 hopefully [2] 39/25 44/1 hours [1] 70/21 House [2] 2/5 4/22 how [13] 13/7 26/12 27/7 27/10 28/5 44/9 48/16 56/21 57/22 57/25 59/15 61/16 67/16 however [8] 18/1 37/11 40/3 51/3 54/1 55/13 56/14 65/2 huge [1] 68/13	Human [1] 11/2 Humza [3] 11/17 34/23 42/4 Humza Yousaf [3] 11/17 34/23 42/4 hundreds [1] 12/16 hybrid [1] 2/3
G			I I abide [1] 18/24 I accept [1] 73/9 I also [1] 52/25 I am [8] 1/13 24/17 53/1 65/16 69/17 72/25 73/22 74/20 I appear [2] 1/14 67/20 I can [1] 72/16 I cannot [1] 70/7 I come [1] 53/13 I do [1] 73/5 I don't [6] 64/7 67/23 68/2 68/10 71/19 73/9 I have [7] 17/14 21/8 22/16 41/13 52/14 74/18 75/5 I hope [5] 28/19 52/6 52/14 52/20 74/14 I indicated [2] 16/16 35/23 I intend [1] 5/3 I intended [1] 6/4 I introduce [1] 2/13 I really [1] 71/19 I said [1] 71/21 I say [1] 57/8 I set [1] 8/24 I shall [3] 53/13 53/15 67/16 I should [2] 23/8 74/18 I think [3] 24/19 53/12 74/24 I want [1] 55/4 I were [3] 52/22 68/11 73/24 I will [6] 3/18 7/7 23/9 48/6 68/3 74/4 I would [5] 29/2 52/9 68/1 68/11 71/11 I'm [9] 54/10 57/9 59/1 59/6 67/22 67/23 69/5 74/24 75/5 I've [6] 17/18 71/8 72/19 73/10 73/12 74/15 ICO [1] 59/20 idea [1] 59/4 identification [1] 68/9 identified [2] 38/19 39/7 identify [1] 36/18 identity [3] 24/22		

I	indeed [8] 26/15 27/18 37/1 37/7 53/10 53/11 67/14 75/3	50/14 50/18 50/20 50/25 51/3 51/8 51/11 51/14 51/19 59/14 65/20 66/5 71/6	invitation [1] 16/23 invited [4] 41/13 43/7 43/23 50/14 involve [2] 27/17 43/9 involved [12] 11/25 20/23 21/23 36/20 36/24 38/15 39/11 42/20 42/21 55/23 56/8 57/25 involvement [5] 2/12 15/17 16/7 41/12 66/18 Ipsos [1] 49/7 irrelevant [1] 63/17 is [112] issue [8] 20/13 24/14 29/13 64/22 65/1 68/2 69/12 69/19 issued [18] 6/13 8/4 10/1 11/14 11/18 11/25 14/2 16/16 16/21 17/11 21/17 23/19 24/11 33/25 35/3 37/25 44/18 44/22 issues [19] 5/11 12/23 21/5 37/14 37/20 37/22 38/3 38/9 38/11 38/18 39/7 39/10 43/2 44/5 47/25 55/25 64/4 64/9 74/7 issuing [2] 27/18 35/12 it [73] 3/17 4/5 8/3 9/23 13/8 15/11 16/11 17/8 18/24 19/9 23/17 24/3 24/24 25/1 26/16 28/1 28/2 28/23 29/17 30/9 31/6 31/24 32/7 34/2 37/14 37/15 40/8 40/10 42/14 42/17 43/2 47/15 48/6 50/25 51/1 51/18 52/12 52/12 53/23 54/2 56/3 56/6 57/1 57/7 57/14 57/22 59/9 60/12 60/13 60/13 60/19 60/24 61/2 61/18 61/25 62/16 63/6 63/14 63/17 63/18 64/12 65/7 65/23 66/8 67/3 67/5 68/25 69/16 70/15 70/17 71/11 71/16 72/24 it's [4] 53/12 59/25 66/5 72/22 item [1] 5/19 its [30] 1/21 4/5 4/5 8/10 8/17 10/6 17/7 17/24 21/13 22/20 23/12 24/7 24/9 24/18 28/11 30/11 31/17 33/4 35/13 39/14	51/24 52/20 57/6 61/23 62/12 62/23 63/15 67/6 67/7 67/8 itself [2] 6/5 69/15
identity... [2] 25/23 42/21 ie [1] 37/13 if [36] 6/8 13/11 14/20 15/15 19/9 25/6 26/1 26/15 27/10 28/2 28/23 32/1 32/15 37/17 52/22 53/20 58/3 58/7 58/7 58/14 58/15 58/16 60/13 60/25 61/4 61/6 61/11 65/5 65/9 65/12 68/11 68/24 69/7 73/17 73/24 74/21 imminent [1] 33/2 imminently [1] 34/25 impact [11] 5/15 8/7 12/23 33/12 34/2 34/8 41/16 48/10 49/17 50/23 57/1 impacted [1] 74/1 impediment [2] 23/23 24/3 imperative [1] 67/6 implementing [1] 51/20 importance [6] 12/12 20/18 54/19 56/3 56/19 71/5 important [21] 4/6 8/14 8/22 14/18 18/24 21/4 26/16 27/19 30/15 32/2 35/4 36/8 38/18 43/11 49/9 52/3 59/25 63/10 67/3 70/23 71/10 importantly [1] 56/5 imprisonment [1] 62/14 include [4] 19/23 33/23 37/9 42/18 included [4] 8/5 13/2 15/4 60/5 includes [3] 33/20 33/24 34/2 including [29] 4/16 8/11 10/11 10/13 10/21 11/16 11/20 19/25 21/14 21/24 22/1 22/6 25/22 26/5 31/25 33/11 33/14 33/20 34/3 35/4 37/7 42/3 42/19 46/25 47/3 47/19 48/2 48/17 63/7 Inclusion [1] 2/23 Inclusion Scotland [1] 2/23 incomplete [4] 26/20 27/5 61/19 62/10 incorrect [1] 61/18 increases [1] 38/17 increasing [1] 44/2	independent [1] 8/22 INDEX [1] 75/9 indicated [3] 1/13 16/16 35/23 indicating [2] 15/6 26/23 indicators [1] 43/19 indirect [1] 46/3 individual [17] 11/24 17/10 19/17 22/16 23/13 25/11 25/13 25/21 27/4 28/12 30/20 33/15 33/16 33/22 40/15 48/12 59/15 individually [1] 65/12 individuals [29] 7/15 11/11 11/13 12/4 12/14 14/1 14/13 15/23 16/5 17/7 22/17 22/23 23/13 25/7 25/23 26/14 29/24 31/5 33/25 40/9 40/11 41/8 41/9 41/20 42/21 49/20 55/10 60/20 72/21 indulge [1] 53/20 inequality [3] 47/20 48/3 48/3 inevitably [2] 39/6 39/10 influence [1] 41/22 inform [1] 13/6 informal [23] 20/12 20/14 20/25 21/10 21/19 21/25 22/5 22/22 22/24 23/2 23/11 24/8 24/14 25/6 27/6 27/24 28/21 69/19 70/8 70/16 70/19 71/12 71/15 informally [1] 35/12 information [33] 6/12 6/23 10/25 15/12 21/2 21/4 21/16 22/4 22/21 24/11 24/20 24/24 26/17 26/21 27/3 28/3 30/12 30/22 48/20 52/1 57/7 60/3 60/5 60/7 60/9 60/10 60/13 62/3 62/10 63/17 64/12 65/3 70/25 Information Act [1] 60/7 ingather [1] 56/5 inherently [1] 58/19 initial [5] 8/14 33/12 34/4 34/9 40/24 initiative [1] 51/21 inquiries [18] 4/16 19/4 23/20 50/5 50/12	integrity [1] 59/13 intend [4] 5/3 29/5 38/24 44/15 intended [2] 6/4 43/2 intends [4] 12/11 34/22 37/5 42/14 intention [5] 40/11 41/15 42/24 43/15 47/14 intentions [2] 73/10 73/11 interest [4] 2/8 4/7 37/23 50/8 interested [1] 43/25 interfere [1] 59/16 intergovernmental [3] 12/1 45/13 48/2 internal [1] 19/22 international [4] 4/10 42/12 45/3 54/25 intimated [3] 4/1 39/1 51/4 into [15] 1/4 7/5 12/16 20/16 31/23 53/4 59/22 63/5 64/6 69/25 71/15 71/17 72/23 73/11 74/17 introduce [1] 2/13 Introductory [1] 50/3 investigate [1] 20/22 investigation [3] 5/25 26/11 53/4 investigations [5] 1/17 20/16 20/21 39/6 59/22 investigative [1] 38/14		
J			Jack [1] 12/3 James [1] 47/3 Jamie [2] 1/6 1/13 Jamie Dawson KC [1] 1/13 January [22] 1/8 3/25 4/9 5/3 5/12 28/18 37/21 40/21 41/4 42/12 48/8 49/3 49/24 51/5 52/19 54/5 54/17 56/7 60/22 69/4 73/24 75/1 January 2020 [3] 28/18 54/17 60/22 January 2024 [7] 4/9 5/12 37/21 49/3 49/24 51/5 73/24 Jason [1] 11/21 Jason Leitch [1] 11/21 Jeane [4] 11/16 34/24 42/7 58/21 Jeane Freeman [4] 11/16 34/24 42/7 58/21 job [1] 73/8 John [3] 11/16 34/24 42/5 John Swinney [3] 11/16 34/24 42/5 Johnson's [1] 58/11 joint [2] 3/13 50/12 jointly [1] 34/3 judgement [1] 71/9 July [3] 9/12 48/11 68/7 July 2023 [1] 68/7 June [4] 18/21 48/14 50/13 58/20 junior [2] 1/15 1/16 just [2] 53/20 66/19 justice [2] 11/3 59/16 Justice Scotland [1] 11/3 justification [1] 27/9 justifies [1] 32/17	
			K Kate [2] 11/17 34/24 Kate Forbes [2] 11/17 34/24 KC [17] 1/13 2/16 2/19 2/22 3/8 3/15 3/16 53/6 53/13 53/14 54/7 54/9 59/18 67/16 67/19 76/8 76/12 keep [2] 29/5 60/13 kept [3] 30/10 33/6	

K	63/7 63/9 63/25 legally [1] 2/11 legislation [2] 42/23 60/11 legislative [1] 39/15 Leicester [1] 47/10 Leitch [1] 11/21 lengthy [1] 18/5 Leslie [1] 34/25 Leslie Evans [1] 34/25 less [5] 52/16 53/9 56/2 59/11 59/19 Let [1] 69/19 Let's [1] 51/25 light [4] 26/8 30/23 32/11 50/17 like [4] 29/2 52/9 53/25 68/1 likely [6] 13/17 36/14 42/18 44/12 48/6 62/14 limitations [1] 44/12 limited [4] 21/14 22/1 28/16 51/13 limiting [1] 37/11 lines [2] 8/19 43/12 links [1] 4/13 list [23] 5/11 5/12 5/19 37/20 37/21 37/22 38/3 38/7 38/9 38/11 38/16 38/20 38/21 38/22 40/18 40/25 41/2 41/14 44/7 64/4 64/5 64/9 64/10 listen [1] 2/9 listening [5] 1/19 7/13 18/21 48/9 51/25 listening exercise [2] 48/9 51/25 little [2] 2/12 27/7 live [1] 4/5 lived [1] 49/20 lives [4] 48/17 53/8 57/16 59/19 living [1] 49/20 located [1] 31/4 locations [1] 30/13 logistics [1] 70/4 London [3] 2/6 2/20 59/10 Long [1] 47/11 Long Covid [1] 47/11 longer [1] 28/23 look [3] 54/14 54/23 70/22 loss [1] 49/22 lost [2] 53/8 59/19 lot [1] 69/6 LPP [4] 32/21 62/25 63/21 69/12	54/4 machinery [1] 66/16 made [41] 1/7 1/23 2/17 2/21 2/24 5/24 6/12 8/25 9/8 13/3 13/22 14/5 14/10 15/2 18/22 19/13 20/18 21/12 27/24 28/8 29/16 32/18 36/9 39/20 39/24 48/18 50/9 52/7 55/3 56/22 56/23 62/17 63/24 64/1 66/11 67/17 70/10 72/22 73/12 73/14 74/21 Mail [1] 59/1 main [1] 17/4 major [2] 16/17 72/1 majority [5] 29/19 35/21 39/25 41/1 60/19 make [15] 6/7 7/16 13/14 17/14 24/7 34/19 41/14 43/6 48/20 55/4 65/11 65/12 67/15 71/24 73/18 makers [9] 8/19 11/15 12/15 12/25 14/10 21/1 23/1 23/3 26/5 makes [3] 46/21 60/12 67/3 making [25] 1/5 1/21 12/19 13/5 20/16 22/9 29/9 39/12 41/23 42/20 42/22 45/5 45/13 45/19 46/7 48/4 54/14 54/16 57/15 57/20 60/21 70/9 70/9 73/3 74/8 manage [1] 60/9 management [17] 1/22 8/10 8/17 9/3 9/20 9/23 10/3 10/11 10/20 12/19 21/3 22/2 30/11 45/19 53/4 70/12 70/14 many [12] 12/17 13/24 32/25 35/10 35/15 40/6 41/2 55/23 64/13 72/20 73/12 73/14 March [11] 2/2 3/5 4/2 5/22 8/25 38/2 39/2 46/18 52/9 59/11 71/3 March 2022 [1] 71/3 March 2023 [1] 3/5 marching [1] 69/14 material [36] 15/4 16/17 16/24 17/1 17/5 19/2 23/11 23/18 28/21 30/3 31/18 32/3	34/12 35/25 36/6 36/7 36/16 36/18 36/25 37/5 37/12 42/22 43/3 51/9 51/14 51/19 56/5 56/10 62/24 63/11 63/14 63/19 68/13 71/5 73/2 73/6 materials [8] 28/25 29/21 34/6 34/9 34/12 36/9 56/17 58/24 matter [6] 7/7 15/8 23/22 28/5 45/1 59/15 matters [48] 5/14 6/4 6/14 7/3 7/24 11/4 12/10 13/23 14/21 15/13 15/19 16/3 16/5 16/12 16/24 17/2 22/9 23/4 27/1 38/12 38/13 38/14 41/12 42/17 44/24 46/3 46/25 47/16 47/25 48/10 48/13 48/21 48/24 49/1 49/2 49/6 49/11 51/23 53/23 53/24 54/12 55/15 56/9 56/13 64/7 70/4 71/13 72/4 maximising [1] 30/15 may [32] 2/13 3/17 16/3 16/11 19/20 21/11 27/17 29/20 32/2 32/5 32/6 37/1 38/5 40/11 40/19 42/6 44/6 48/18 51/1 52/25 55/6 60/14 61/2 61/12 62/5 63/10 64/11 65/23 69/11 72/5 72/8 73/18 May 2021 [1] 42/6 me [8] 1/6 1/17 6/4 6/21 39/5 53/20 69/19 72/1 mean [2] 57/10 70/17 means [3] 7/14 21/10 38/15 mechanisms [2] 39/15 45/12 media [1] 56/23 medical [1] 57/18 medicine [1] 47/10 meet [1] 64/8 meeting [4] 14/22 50/12 50/15 55/17 meetings [12] 6/9 6/18 6/22 7/8 7/10 50/3 50/6 57/17 66/20 66/23 68/8 68/12 members [9] 2/8 4/16 6/11 8/12 11/21 33/13 34/5 50/4 66/6 membership [1] 24/23 memorandum [1] 50/17	mentioned [1] 41/9 merited [2] 8/2 26/11 messages [49] 19/2 19/3 19/3 20/11 20/15 20/23 20/25 21/10 21/15 22/1 22/3 22/7 22/8 22/15 22/22 22/24 23/3 23/24 24/23 25/6 25/14 25/22 25/25 26/6 26/9 26/13 27/7 28/4 28/15 28/21 29/5 29/7 56/19 58/13 58/24 59/8 59/21 60/17 60/19 61/2 61/8 61/13 69/9 69/19 70/1 70/2 70/5 70/20 71/15 messaging [14] 20/12 21/19 22/6 22/22 23/11 24/8 24/15 26/4 27/6 27/24 61/6 69/20 70/3 70/18 met [2] 13/12 16/10 methods [1] 21/1 Michael [1] 12/2 Michael Gove [1] 12/2 Microsoft [1] 21/15 Microsoft Teams [1] 21/15 might [9] 23/7 28/1 29/3 32/3 43/25 56/15 58/12 63/11 70/19 mind [2] 29/6 73/14 mindful [1] 25/5 minds [1] 62/14 minimise [2] 40/14 50/10 minister [6] 18/21 19/8 42/3 42/4 42/5 58/21 ministers [13] 2/20 3/17 8/11 11/18 11/25 31/23 41/1 42/2 58/4 58/6 63/6 66/21 67/7 minutes [2] 18/8 18/9 miss [2] 32/2 63/10 misunderstandings [1] 18/1 Mitchell [18] 2/16 2/19 3/15 3/16 30/7 53/6 53/13 53/14 54/7 54/9 67/14 67/16 67/17 67/19 72/12 74/15 76/8 76/12 mobile [1] 61/7 modular [2] 36/11 36/17 module [143] Module 1 [1] 36/23 Module 2 [19] 20/17 33/23 36/11 36/13 36/13 36/16 36/23 36/23 37/11 39/3 43/9
L	lack [4] 24/12 27/23 57/1 69/7 Lady [31] 1/12 1/24 3/14 12/7 20/13 23/8 26/16 29/12 46/18 52/6 53/20 54/10 55/4 56/1 57/9 57/12 58/10 62/6 62/18 64/4 64/8 65/11 66/13 67/20 67/22 68/19 69/12 71/20 72/5 72/14 75/2 Ladyship [1] 13/13 Ladyship's [1] 13/11 Laia [1] 47/4 large [4] 4/16 11/11 12/4 32/9 largest [1] 36/3 last [8] 3/4 5/1 5/22 8/24 11/10 38/2 39/1 52/8 late [4] 16/21 48/18 62/10 68/5 later [2] 3/15 16/13 launched [2] 48/14 49/10 Law [3] 31/20 32/14 62/25 lead [4] 1/11 1/13 47/15 76/3 learn [1] 72/24 learned [4] 1/15 59/18 67/24 72/15 least [2] 20/20 59/8 leave [1] 15/18 led [2] 47/2 56/18 left [2] 36/1 62/9 legal [20] 14/14 17/24 27/14 30/1 31/9 31/19 31/25 32/1 32/8 32/13 32/24 36/5 40/7 50/3 50/7 52/25 62/18	limitations [1] 44/12 limited [4] 21/14 22/1 28/16 51/13 limiting [1] 37/11 lines [2] 8/19 43/12 links [1] 4/13 list [23] 5/11 5/12 5/19 37/20 37/21 37/22 38/3 38/7 38/9 38/11 38/16 38/20 38/21 38/22 40/18 40/25 41/2 41/14 44/7 64/4 64/5 64/9 64/10 listen [1] 2/9 listening [5] 1/19 7/13 18/21 48/9 51/25 listening exercise [2] 48/9 51/25 little [2] 2/12 27/7 live [1] 4/5 lived [1] 49/20 lives [4] 48/17 53/8 57/16 59/19 living [1] 49/20 located [1] 31/4 locations [1] 30/13 logistics [1] 70/4 London [3] 2/6 2/20 59/10 Long [1] 47/11 Long Covid [1] 47/11 longer [1] 28/23 look [3] 54/14 54/23 70/22 loss [1] 49/22 lost [2] 53/8 59/19 lot [1] 69/6 LPP [4] 32/21 62/25 63/21 69/12	make [15] 6/7 7/16 13/14 17/14 24/7 34/19 41/14 43/6 48/20 55/4 65/11 65/12 67/15 71/24 73/18 makers [9] 8/19 11/15 12/15 12/25 14/10 21/1 23/1 23/3 26/5 makes [3] 46/21 60/12 67/3 making [25] 1/5 1/21 12/19 13/5 20/16 22/9 29/9 39/12 41/23 42/20 42/22 45/5 45/13 45/19 46/7 48/4 54/14 54/16 57/15 57/20 60/21 70/9 70/9 73/3 74/8 manage [1] 60/9 management [17] 1/22 8/10 8/17 9/3 9/20 9/23 10/3 10/11 10/20 12/19 21/3 22/2 30/11 45/19 53/4 70/12 70/14 many [12] 12/17 13/24 32/25 35/10 35/15 40/6 41/2 55/23 64/13 72/20 73/12 73/14 March [11] 2/2 3/5 4/2 5/22 8/25 38/2 39/2 46/18 52/9 59/11 71/3 March 2022 [1] 71/3 March 2023 [1] 3/5 marching [1] 69/14 material [36] 15/4 16/17 16/24 17/1 17/5 19/2 23/11 23/18 28/21 30/3 31/18 32/3	mentioned [1] 41/9 merited [2] 8/2 26/11 messages [49] 19/2 19/3 19/3 20/11 20/15 20/23 20/25 21/10 21/15 22/1 22/3 22/7 22/8 22/15 22/22 22/24 23/3 23/24 24/23 25/6 25/14 25/22 25/25 26/6 26/9 26/13 27/7 28/4 28/15 28/21 29/5 29/7 56/19 58/13 58/24 59/8 59/21 60/17 60/19 61/2 61/8 61/13 69/9 69/19 70/1 70/2 70/5 70/20 71/15 messaging [14] 20/12 21/19 22/6 22/22 23/11 24/8 24/15 26/4 27/6 27/24 61/6 69/20 70/3 70/18 met [2] 13/12 16/10 methods [1] 21/1 Michael [1] 12/2 Michael Gove [1] 12/2 Microsoft [1] 21/15 Microsoft Teams [1] 21/15 might [9] 23/7 28/1 29/3 32/3 43/25 56/15 58/12 63/11 70/19 mind [2] 29/6 73/14 mindful [1] 25/5 minds [1] 62/14 minimise [2] 40/14 50/10 minister [6] 18/21 19/8 42/3 42/4 42/5 58/21 ministers [13] 2/20 3/17 8/11 11/18 11/25 31/23 41/1 42/2 58/4 58/6 63/6 66/21 67/7 minutes [2] 18/8 18/9 miss [2] 32/2 63/10 misunderstandings [1] 18/1 Mitchell [18] 2/16 2/19 3/15 3/16 30/7 53/6 53/13 53/14 54/7 54/9 67/14 67/16 67/17 67/19 72/12 74/15 76/8 76/12 mobile [1] 61/7 modular [2] 36/11 36/17 module [143] Module 1 [1] 36/23 Module 2 [19] 20/17 33/23 36/11 36/13 36/13 36/16 36/23 36/23 37/11 39/3 43/9
M	M2A [3] 47/24 53/2			

M	67/17 67/19 67/24 71/25 72/12 72/13 72/18 72/22 74/15 74/16 76/12 Mr Boris Johnson's [1] 58/11 Mr Daniel Friedman KC [1] 2/22 Mr Dawson [11] 1/10 53/10 53/19 54/6 59/18 67/17 67/24 71/25 72/13 72/18 72/22 Mr Dawson's [1] 74/16 Mr Geoffrey Mitchell KC [1] 2/19 Mr Jamie Dawson King's [1] 1/6 Mr Mitchell [6] 53/14 67/16 67/19 72/12 74/15 76/12 Mr Mitchell KC [1] 3/16 Mr Simon Bowie [1] 3/6 Ms [15] 2/16 2/25 3/2 3/8 3/15 30/7 53/6 53/13 54/7 54/9 58/24 59/9 67/14 67/17 76/8 Ms Claire Mitchell KC [1] 2/16 Ms Freeman [2] 58/24 59/9 Ms Genevieve Woods [1] 2/25 Ms Mitchell [3] 30/7 67/14 67/17 Ms Mitchell KC [6] 3/15 53/6 53/13 54/7 54/9 76/8 Ms Olivia Smith [1] 3/2 Ms Una Doherty KC [1] 3/8 much [9] 36/9 53/10 54/6 67/14 68/3 69/1 72/12 72/18 75/3 multiple [1] 7/22 must [2] 13/20 73/11 mutual [1] 50/8 my [45] 1/12 1/15 1/24 3/14 3/20 5/19 12/7 19/11 20/13 23/8 26/16 29/12 46/18 48/7 52/6 53/20 53/21 54/10 55/4 56/1 57/9 57/12 58/10 59/18 62/6 62/18 64/4 64/8 65/11 66/13 67/20 67/22 67/24 68/19 69/12 71/20 72/5 72/6 72/7 72/14 72/14 73/13 73/14 74/5 75/2	my Lady [30] 1/12 1/24 12/7 20/13 23/8 26/16 29/12 46/18 52/6 53/20 54/10 55/4 56/1 57/9 57/12 58/10 62/6 62/18 64/4 64/8 65/11 66/13 67/20 67/22 68/19 69/12 71/20 72/5 72/14 75/2	N	named [1] 26/23 namely [2] 6/21 64/23 names [3] 40/19 64/13 64/15 narrative [1] 67/25 national [6] 3/1 3/8 10/14 34/13 34/14 73/19 nations [2] 39/4 66/19 nature [6] 4/20 22/5 23/6 25/7 38/15 46/20 Nazroo [1] 47/3 nearly [1] 24/18 necessary [12] 16/11 20/10 28/25 32/7 35/2 44/14 44/17 52/13 52/22 58/16 65/8 66/5 need [15] 9/9 20/22 25/7 26/25 30/11 32/4 32/5 32/6 35/10 44/10 64/7 67/11 71/24 72/8 73/2 needed [2] 31/24 64/12 needs [6] 19/21 38/20 60/13 63/6 68/24 72/6 never [1] 29/20 new [4] 49/4 49/6 49/14 49/14 New Year [1] 49/14 next [4] 3/24 27/17 49/8 74/24 NHS [4] 3/8 10/13 10/14 34/13 Nicholas [1] 47/5 Nicola [3] 11/16 34/23 42/3 Nicola Sturgeon [3] 11/16 34/23 42/3 nine [4] 2/10 5/18 5/20 7/9 no [25] 12/8 15/17 15/20 17/21 19/1 22/13 22/15 23/10 26/22 28/22 30/18 32/21 39/24 58/18 59/5 59/5 59/15 59/15 61/20 61/20 62/6 63/19 65/1 69/16 72/14	no one's [2] 59/5 59/5 nobody's [2] 59/2 59/3 nobody's one's [1] 59/3 non [2] 24/1 59/2 non-production [1] 24/1 north [1] 55/3 northwards [1] 67/7 not [71] 3/11 4/23 9/7 13/15 13/20 14/21 15/13 16/1 16/10 17/24 19/9 20/20 21/9 21/14 22/1 22/7 23/22 23/25 24/3 26/1 26/1 26/25 27/7 27/8 27/15 28/2 28/2 28/4 29/3 29/4 29/7 29/10 29/20 30/22 31/17 32/15 37/15 38/16 39/20 40/8 47/15 51/1 51/5 52/22 52/23 55/6 55/15 58/18 59/6 60/20 61/1 61/21 61/22 62/23 64/18 65/16 65/21 65/23 70/9 70/15 70/17 70/18 71/11 71/13 71/23 72/8 72/24 73/24 74/3 74/4 74/22 note [20] 6/4 7/21 29/2 30/5 54/12 54/13 55/8 55/19 55/20 57/12 59/20 60/18 62/4 62/20 62/20 63/2 65/2 65/15 65/19 65/22 notebook [1] 29/22 notebooks [10] 29/15 29/16 29/23 30/2 30/6 30/18 31/3 31/4 57/8 57/21 noted [2] 50/25 58/17 notes [9] 30/9 31/7 44/17 44/20 56/19 57/19 58/1 58/2 61/20 nothing [3] 53/9 59/19 72/15 notice [6] 23/19 24/1 40/4 40/9 55/25 62/12 notices [3] 27/19 62/5 62/8 notification [1] 40/6 notified [1] 40/11 November [5] 2/2 35/17 40/19 41/14 44/8 November 2023 [2] 35/17 40/19 now [25] 1/6 2/10 5/20 8/21 9/16 17/19 20/10 23/1 24/1 25/1	28/5 31/2 38/21 50/23 53/12 56/2 57/13 57/20 58/1 59/9 61/21 64/6 64/16 65/11 67/16 NPIs [1] 48/2 nub [1] 13/3 number [12] 11/11 16/14 17/14 31/6 32/25 34/21 36/21 46/24 55/4 55/8 59/23 64/24 Number 10 [1] 59/23 numbers [1] 20/1 numerous [10] 9/1 10/4 10/10 13/24 17/9 18/1 25/2 25/3 35/11 57/17	O	objective [1] 39/16 obligations [1] 60/10 obliged [2] 54/10 65/17 observations [3] 17/14 17/17 41/14 obtain [3] 46/19 63/14 63/18 obtained [1] 46/22 obtaining [4] 62/3 64/11 64/20 73/1 obvious [1] 60/24 obviously [2] 72/24 74/22 occasionally [1] 15/12 occasions [3] 20/19 32/25 35/11 October [10] 1/1 7/21 23/25 29/23 35/16 45/9 45/17 46/16 46/17 47/13 offence [2] 59/24 62/13 offer [1] 7/9 offered [1] 6/18 office [3] 10/12 10/16 59/20 Officers' [3] 31/20 32/14 63/1 official [2] 58/8 60/1 officials [3] 31/24 59/21 63/6 often [1] 30/13 Olivia [1] 3/2 on [120] Once [2] 30/1 44/6 one [14] 1/16 4/12 5/4 19/11 23/8 24/5 28/12 28/22 29/2 29/11 29/22 53/21 61/25 74/13 one's [3] 59/3 59/5 59/5
----------	---	--	----------	--	---	--	----------	---

<p>O</p> <p>ones [1] 64/14</p> <p>online [2] 4/24 75/4</p> <p>only [14] 7/24 17/25 21/9 22/7 30/6 32/2 35/6 37/17 56/1 58/18 61/9 63/10 65/21 67/9</p> <p>onto [2] 71/15 71/17</p> <p>open [3] 7/10 29/6 38/19</p> <p>opening [3] 43/4 43/6 48/7</p> <p>openness [1] 25/17</p> <p>operating [2] 61/25 66/25</p> <p>operation [11] 5/16 14/16 22/18 24/8 49/25 50/11 52/2 52/16 61/24 65/14 65/19</p> <p>opportunity [10] 6/6 7/6 29/4 43/5 43/23 44/3 44/12 56/8 62/8 64/20</p> <p>or [54] 2/4 2/15 4/23 6/10 6/19 7/3 7/15 7/18 7/25 14/22 15/9 15/13 16/4 16/6 16/12 17/6 17/11 19/3 19/17 21/2 22/13 23/11 23/12 27/4 27/8 27/18 30/7 30/19 30/20 31/19 36/23 40/6 41/1 43/22 44/17 44/23 46/20 47/17 47/18 47/25 55/9 56/25 58/5 58/8 60/13 62/25 63/20 63/21 65/10 66/19 68/17 69/17 70/20 73/19</p> <p>oral [9] 6/7 14/8 36/13 40/20 41/3 41/17 47/21 54/22 74/23</p> <p>orally [1] 64/21</p> <p>order [12] 4/25 6/16 9/9 15/24 22/10 23/20 35/14 36/15 44/8 56/7 63/3 69/10</p> <p>ordinate [1] 39/2</p> <p>ordination [1] 9/21</p> <p>organisation [3] 8/2 16/6 41/19</p> <p>organisation's [1] 41/18</p> <p>organisations [16] 3/3 7/15 8/6 10/10 10/18 11/7 16/4 16/22 33/12 34/3 34/8 41/6 41/10 41/17 41/21 48/24</p> <p>originally [2] 19/14 29/18</p>	<p>other [32] 3/10 4/15 7/25 8/1 9/19 10/18 11/17 20/12 21/10 21/22 23/11 28/8 30/18 34/4 39/10 45/1 45/6 45/25 46/23 48/5 48/23 50/5 51/16 58/24 59/23 60/10 63/15 66/1 70/7 72/14 73/25 74/16</p> <p>others [5] 7/11 11/13 26/5 52/17 74/9</p> <p>ought [6] 12/24 12/25 37/3 60/24 64/2 69/22</p> <p>our [21] 3/22 5/1 5/21 5/25 12/23 21/20 21/21 28/25 36/6 36/22 38/16 38/21 38/21 39/6 41/3 43/15 49/10 51/22 52/18 69/14 74/12</p> <p>out [26] 1/6 4/25 7/23 8/24 9/6 13/8 16/17 22/16 25/20 26/16 30/7 30/18 31/16 40/17 40/19 43/3 44/20 51/21 54/12 55/19 55/20 62/23 63/2 63/15 63/22 70/21</p> <p>outbreak [1] 9/20</p> <p>outcomes [1] 48/4</p> <p>outline [1] 3/22</p> <p>outset [2] 71/21 72/1</p> <p>outwith [1] 68/22</p> <p>over [5] 12/17 19/4 19/5 51/2 72/19</p> <p>overall [1] 26/2</p> <p>overdue [1] 35/4</p> <p>own [2] 23/12 51/24</p> <p>Oxford [1] 45/2</p> <p>Oxford University [1] 45/2</p> <hr/> <p>P</p> <p>pace [1] 36/8</p> <p>PAGE [1] 76/2</p> <p>pandemic [42] 1/22 8/8 8/18 9/3 9/24 10/3 10/11 10/20 11/15 12/19 12/22 13/16 21/3 22/2 23/4 23/5 25/25 26/4 28/9 28/13 29/9 30/11 39/13 41/19 42/8 42/23 45/4 45/15 45/19 46/12 46/20 48/16 49/13 49/22 53/5 54/17 57/1 63/23 66/15 66/17 73/4 73/21</p> <p>papers [1] 57/18</p> <p>paragraph [2] 15/11 23/17</p> <p>paragraph 3 [1]</p>	<p>15/11</p> <p>paragraph 5 [1] 23/17</p> <p>parity [1] 55/1</p> <p>Parliament [2] 10/15 18/23</p> <p>part [19] 12/4 12/20 14/18 15/2 17/8 17/13 18/2 19/13 20/15 21/21 28/11 30/15 32/2 33/4 37/3 39/3 50/11 63/10 70/15</p> <p>partial [1] 35/6</p> <p>participant [11] 2/10 3/4 3/13 5/20 6/15 6/16 6/25 7/1 7/9 43/25 50/12</p> <p>participants [63] 2/3 2/14 3/10 3/21 5/4 5/10 5/19 6/2 6/10 6/19 7/2 7/21 9/11 9/12 14/7 15/24 18/20 20/6 20/19 21/21 29/23 32/5 33/6 33/9 33/18 33/19 34/6 34/11 34/20 36/3 36/10 36/15 36/22 36/22 37/6 37/15 37/23 38/5 38/6 38/10 40/2 40/18 41/13 42/15 43/5 43/7 43/10 43/17 44/11 44/16 45/7 45/16 45/24 46/14 47/8 50/14 50/16 56/6 56/7 61/17 62/11 63/18 69/23</p> <p>participate [1] 44/12</p> <p>participated [1] 25/23</p> <p>participating [1] 2/4</p> <p>particular [17] 6/24 8/1 8/2 8/7 9/10 16/19 20/14 24/14 24/21 26/8 26/12 32/21 41/25 43/25 45/4 50/9 54/1</p> <p>particularly [2] 12/22 41/21</p> <p>parties [3] 9/10 55/23 59/23</p> <p>parts [1] 39/8</p> <p>passages [2] 32/20 32/22</p> <p>pattern [1] 30/22</p> <p>Paul [1] 45/21</p> <p>pay [1] 52/25</p> <p>people [6] 12/12 13/18 48/20 49/11 67/11 74/9</p> <p>people's [5] 10/23 34/15 41/6 41/10 48/17</p> <p>perfectly [2] 15/18 18/3</p>	<p>perhaps [4] 56/14 59/8 72/6 72/7</p> <p>period [6] 3/25 14/19 21/4 28/17 43/18 52/18</p> <p>permit [1] 51/14</p> <p>permits [1] 28/23</p> <p>permitted [1] 43/11</p> <p>person [10] 2/4 2/15 2/19 2/25 3/3 4/14 49/12 50/13 64/1 64/18</p> <p>personal [2] 69/11 71/9</p> <p>personnel [1] 50/1</p> <p>perspective [2] 10/19 68/4</p> <p>perusal [1] 40/25</p> <p>phone [1] 61/7</p> <p>picture [3] 27/15 48/16 56/25</p> <p>pivotal [1] 42/7</p> <p>place [23] 2/1 3/24 4/3 4/9 6/10 7/8 27/2 42/11 49/2 50/3 50/7 50/13 51/7 54/3 54/5 54/23 54/24 64/3 66/6 71/16 73/5 73/23 74/2</p> <p>placed [6] 17/23 23/15 37/1 59/10 66/2 69/15</p> <p>places [2] 27/3 66/10</p> <p>plain [2] 72/22 73/12</p> <p>plainly [1] 68/24</p> <p>plan [1] 3/14</p> <p>plans [6] 5/2 5/11 6/23 13/12 37/20 60/23</p> <p>platforms [6] 20/12 70/3 70/8 70/17 70/18 71/12</p> <p>play [3] 8/15 16/18 66/8</p> <p>played [5] 9/23 28/8 41/22 42/7 49/23</p> <p>playing [1] 67/1</p> <p>pleased [4] 24/17 54/22 62/1 64/13</p> <p>pm [1] 75/7</p> <p>point [9] 8/4 8/20 20/18 24/13 26/16 32/25 53/21 61/14 69/4</p> <p>points [3] 67/15 67/17 68/1</p> <p>Police [3] 3/1 10/17 34/14</p> <p>policies [3] 24/21 25/3 26/13</p> <p>policy [6] 24/7 24/11 45/22 58/8 69/20 70/24</p> <p>political [6] 1/20 45/11 45/18 48/3</p>	<p>54/15 56/21</p> <p>politician [2] 57/22 63/20</p> <p>politicians [4] 56/20 57/15 60/16 60/25</p> <p>politics [2] 45/21 58/20</p> <p>position [15] 24/9 25/2 25/12 25/16 25/18 25/20 26/15 26/19 27/9 27/20 28/19 29/14 30/25 35/7 57/7</p> <p>positive [1] 50/6</p> <p>possession [2] 23/12 23/12</p> <p>possibility [2] 38/18 69/11</p> <p>possible [19] 4/22 13/19 19/19 20/8 20/10 31/22 36/10 40/8 40/10 40/23 41/7 51/1 61/12 63/4 64/2 65/23 66/11 67/8 73/17</p> <p>postpone [1] 73/25</p> <p>postponed [1] 73/24</p> <p>Potemkin [1] 66/24</p> <p>potential [8] 14/24 20/17 21/18 40/4 40/14 43/12 44/5 55/21</p> <p>potentially [4] 20/11 27/25 28/21 52/1</p> <p>power [1] 63/23</p> <p>powerful [1] 59/15</p> <p>powers [3] 35/8 52/22 74/5</p> <p>practical [3] 32/11 38/19 50/18</p> <p>practice [2] 5/25 60/8</p> <p>pre [3] 18/7 46/20 46/23</p> <p>pre-existing [1] 46/23</p> <p>pre-pandemic [1] 46/20</p> <p>pre-prescribed [1] 18/7</p> <p>precise [3] 24/9 26/19 44/14</p> <p>predicted [1] 39/5</p> <p>predominantly [1] 49/3</p> <p>preferred [1] 29/4</p> <p>preliminary [18] 1/4 1/25 2/1 3/5 4/1 5/1 5/22 6/1 8/24 11/10 15/11 31/2 33/3 38/2 39/1 50/22 52/8 59/10</p> <p>preparation [7] 1/17 6/17 25/11 42/9 43/8 44/3 56/25</p> <p>prepared [4] 6/4</p>
--	--	---	---	--

P	Professor Ailsa Henderson [1] 45/10 Professor Brightling [1] 47/17 Professor Chris Brightling [1] 47/9 Professor David [1] 47/6 Professor Hale [1] 47/20 Professor Henderson [1] 47/19 Professor James Nazroo [1] 47/3 Professor Laia Bécaries [1] 47/4 Professor Nicholas Watson [1] 47/5 Professor Paul Cairney [1] 45/21 Professor Thomas Hale [1] 45/2 Professor Tom Shakespeare [1] 47/4 programme [3] 46/9 49/10 58/21 progress [8] 1/7 5/21 5/24 6/3 23/4 33/7 52/7 71/24 project [1] 49/9 prominent [2] 16/18 20/15 promised [1] 19/8 promote [3] 6/16 48/24 54/2 promoting [1] 51/24 properly [2] 56/10 62/17 proposal [3] 33/4 43/16 56/12 proposals [3] 37/4 43/10 43/13 propose [3] 38/3 43/11 67/23 proposed [1] 42/16 proposes [2] 40/17 68/25 proscribed [1] 44/1 protect [1] 13/18 protection [1] 23/21 protocol [1] 19/24 proven [1] 52/23 provide [20] 3/20 11/4 19/16 21/4 21/25 22/3 25/17 26/21 29/8 30/24 38/6 40/5 44/11 44/23 57/23 61/15 64/9 67/8 67/10 69/9 provided [46] 5/21 5/23 10/6 11/1 12/21 14/2 17/4 17/9 17/12 18/17 19/7 19/9 22/15 23/10 24/13 26/18	27/3 28/10 28/14 29/21 29/24 30/6 31/13 31/24 32/19 32/22 33/1 33/3 35/8 35/18 36/13 38/8 38/9 40/7 41/10 44/16 44/23 47/23 48/11 51/15 52/16 57/6 62/10 63/7 68/14 69/24 providers [10] 15/4 16/18 34/21 36/3 36/7 51/10 51/15 51/19 56/11 73/6 provides [3] 26/22 52/6 52/15 providing [7] 7/22 8/15 40/23 41/6 44/2 60/8 68/6 provision [3] 7/18 23/19 51/13 provisional [7] 5/12 37/21 37/24 39/19 40/18 47/14 64/4 provisions [1] 42/22 public [38] 2/8 3/6 3/21 4/7 4/16 10/13 16/20 18/25 18/25 19/11 21/23 21/24 28/9 32/9 34/12 36/4 36/14 39/22 40/5 40/20 45/9 45/17 45/21 46/15 47/12 48/20 49/18 53/1 59/13 60/4 60/8 60/11 60/12 60/14 61/2 63/22 63/25 73/16 publicly [1] 49/23 published [1] 32/6 punishable [1] 62/13 purposes [3] 38/20 70/17 70/20 pursuant [2] 31/19 62/25 pursuit [1] 59/16 push [3] 28/5 29/13 31/8 put [8] 4/17 9/13 15/9 36/6 71/17 72/22 73/11 74/17	quite [1] 61/25 R Rachael [1] 47/11 racism [1] 46/21 radio [1] 48/21 raise [2] 6/5 50/16 raised [8] 13/23 14/21 16/3 16/24 22/10 23/22 55/15 58/22 raises [1] 66/14 raising [1] 48/25 rapid [1] 71/24 rather [2] 56/25 64/21 reach [1] 29/10 read [1] 74/19 real [2] 67/1 68/21 realities [1] 50/18 really [1] 71/19 reason [7] 15/20 24/1 27/1 31/19 62/25 69/16 72/1 reasonable [5] 13/21 44/2 44/11 62/12 74/3 reasons [5] 16/11 56/12 56/22 73/13 73/15 reassurance [1] 72/6 reassured [1] 72/7 recall [3] 1/19 7/13 58/10 receipt [3] 13/8 13/22 39/23 received [24] 6/2 9/4 11/23 12/4 12/15 16/23 17/19 22/25 23/5 24/6 26/2 33/10 34/7 34/9 35/6 35/19 36/12 37/10 39/25 41/2 55/14 60/6 72/20 75/5 recent [1] 50/2 recently [5] 23/18 23/24 49/10 50/21 51/8 recipients [1] 16/2 recognise [2] 69/6 71/22 recommendations [4] 13/6 13/14 54/14 73/18 record [6] 36/6 70/14 71/1 71/7 71/16 71/18 recording [1] 58/6 recordings [1] 66/9 records [4] 58/5 60/2 60/9 60/11 recovered [5] 17/5 25/9 28/1 57/21 58/12 recovery [3] 17/15 17/20 28/20 redact [1] 63/16	redacted [8] 31/18 32/1 32/20 32/22 33/1 51/15 62/24 63/9 redaction [2] 19/25 51/12 redactions [3] 51/10 51/17 51/20 reduce [3] 51/9 51/18 73/18 refer [1] 17/12 reference [1] 60/13 referred [3] 32/6 70/13 70/20 reflected [2] 26/19 66/19 refused [2] 59/4 59/6 regard [12] 21/9 24/3 24/7 25/16 25/18 30/23 31/1 31/10 33/5 44/6 44/15 56/16 regarding [1] 46/22 regardless [1] 70/24 regards [5] 9/7 25/13 26/19 27/5 28/20 regimented [1] 43/16 regular [5] 5/21 6/9 6/13 34/20 50/6 rehearse [1] 64/7 reiterate [2] 15/3 52/9 reiterated [1] 22/23 relate [2] 59/22 74/7 related [1] 28/9 relates [2] 1/20 53/23 relating [14] 7/24 9/19 11/4 11/8 18/9 18/15 19/24 22/9 42/15 44/24 45/3 45/18 47/1 70/4 relation [14] 1/7 10/2 21/12 23/5 24/14 30/2 46/25 47/11 53/21 55/5 57/13 58/10 61/19 64/25 relationship [1] 50/6 relationships [1] 57/24 relatively [2] 4/12 14/19 Relativity [1] 20/3 release [1] 56/23 released [2] 36/2 58/24 relevance [5] 19/23 36/1 46/3 47/16 61/2 relevancy [1] 30/1 relevant [32] 6/25 9/10 10/18 13/17 17/2 17/11 20/11 21/4 22/24 27/25 30/3 30/20 32/4 33/23 36/14 36/16 36/18 37/6 37/13 37/14 37/18 42/23 50/4 57/7
----------	--	---	---	--

R	11/11 11/12 11/13 11/18 11/23 11/24 12/2 12/13 13/9 13/11 13/23 14/2 14/4 14/10 14/15 14/23 16/16 16/21 17/10 18/4 19/18 21/16 22/17 22/19 22/21 23/13 27/12 28/7 29/16 33/25 35/3 35/13 35/13 41/2 52/11 55/5 55/9 55/10 55/16 55/17 56/4 58/16 60/6 62/16 65/12 require [5] 13/10 19/18 20/6 25/4 66/8 required [13] 14/11 20/4 23/19 24/10 24/25 27/15 39/21 51/9 51/18 55/25 56/15 70/22 72/9 requirement [5] 13/20 15/4 16/9 20/9 44/10 requirements [1] 19/22 requires [2] 12/9 60/7 research [2] 10/25 49/7 researching [1] 4/4 residual [1] 18/14 Resilience [2] 9/22 18/11 resolved [3] 15/1 55/22 69/13 resources [1] 55/24 respect [5] 39/18 62/15 69/21 72/3 72/3 respected [3] 13/11 13/20 39/18 respectfully [1] 4/19 respectively [1] 2/2 respiratory [1] 47/9 respond [2] 14/15 69/17 respondent [1] 15/8 response [30] 15/7 16/25 17/8 17/9 18/22 20/23 21/14 21/24 22/13 22/21 24/16 24/17 25/1 25/10 25/20 25/25 26/2 26/4 26/22 27/22 28/9 35/6 35/11 42/8 42/23 43/20 53/5 54/16 61/16 70/5 responses [18] 8/18 9/4 15/23 15/25 22/19 24/5 25/12 29/6 33/11 33/12 33/21 33/25 34/2 34/4 34/7 34/9 48/19 60/5 responsibilities [2]	9/6 11/5 responsible [2] 8/10 29/20 rest [1] 53/1 restrictions [1] 42/19 result [10] 8/8 21/18 27/16 31/2 31/17 49/22 62/23 65/15 68/13 69/1 resulted [1] 18/7 resulting [1] 41/19 retain [2] 31/5 60/17 retained [8] 26/7 27/8 27/8 28/5 60/20 61/8 71/6 71/10 retrieve [1] 61/12 return [1] 7/7 revealed [5] 24/21 24/25 25/8 27/20 27/20 revert [1] 23/9 review [4] 30/1 36/1 36/5 36/18 reviewed [3] 14/7 20/7 29/25 revised [1] 38/9 right [1] 75/2 rights [3] 2/23 3/3 11/2 rigorous [3] 73/2 74/10 74/11 Robinson [1] 47/6 robust [1] 62/1 role [10] 2/12 3/20 8/2 9/3 9/23 10/2 10/10 28/8 41/21 67/1 roles [4] 8/14 11/5 16/18 42/7 Room [2] 9/22 18/11 rooms [1] 57/24 route [1] 27/21 Royal [1] 10/21 rule [53] 5/5 7/12 7/13 7/22 8/5 8/9 8/21 9/15 9/25 11/10 11/24 12/2 12/8 12/15 13/9 14/22 14/23 15/12 15/15 15/23 15/25 16/2 16/4 17/10 19/17 22/17 23/13 24/10 24/17 25/11 27/18 33/11 33/12 33/14 33/15 33/16 33/21 33/24 34/2 34/4 34/7 35/3 35/16 41/2 55/9 55/10 55/16 55/17 59/22 62/5 62/9 68/19 69/10 Rule 21 [2] 62/5 69/10 Rule 9 [44] 5/5 7/12 7/13 7/22 8/5 8/9 8/21 9/15 9/25 11/10 11/24 12/2 13/9 14/22 14/23	15/15 15/23 15/25 16/2 16/4 17/10 19/17 22/17 23/13 24/10 24/17 25/11 33/11 33/12 33/14 33/15 33/16 33/21 33/24 34/2 34/4 34/7 35/3 41/2 55/9 55/10 55/16 55/17 62/9 Rule 9s [4] 12/15 27/18 35/16 68/19 rules [1] 18/24 ruling [3] 46/18 46/21 46/25 run [3] 33/2 49/4 53/24 run-up [1] 33/2 running [3] 12/16 48/21 50/19 runs [2] 18/19 28/17 rush [2] 29/7 29/10	49/14 49/21 51/23 53/5 54/3 54/23 57/15 65/8 65/10 67/4 67/11 73/3 74/7 74/8 74/10 74/10 Scotland's [1] 58/20 Scottish [164] Scottish Care [3] 3/13 10/22 34/17 Scottish Government [68] 1/23 5/8 8/11 9/2 9/8 10/5 10/6 11/14 11/21 14/9 16/15 16/20 17/6 17/16 17/21 18/6 18/11 19/7 21/22 22/14 22/18 22/20 23/1 23/14 24/2 24/6 24/22 25/19 26/3 26/18 28/13 29/9 29/17 29/18 29/21 29/25 30/7 30/10 30/17 30/24 30/25 31/15 32/15 32/17 33/13 34/10 36/4 55/6 57/6 62/7 62/21 63/3 63/19 66/18 66/21 67/7 67/21 68/5 68/8 68/14 69/3 69/15 69/20 70/13 70/15 70/23 71/14 71/23 Scottish Government's [6] 9/22 10/2 15/10 18/2 66/15 72/2 Scottish Inquiry [4] 11/1 17/25 50/24 73/7 Scottish Ministers [2] 2/20 3/17 season [1] 44/13 second [1] 2/1 secretariat [2] 50/2 50/7 Secretaries [1] 11/17 Secretary [3] 10/12 35/5 42/6 section [3] 23/20 27/18 62/11 section 21 [2] 23/20 27/18 sector [1] 10/3 see [7] 15/20 31/24 32/2 63/6 63/10 67/16 69/23 seek [3] 4/17 61/3 63/21 seeking [5] 24/11 24/12 26/12 70/1 73/17 seeks [2] 7/15 15/12 seem [1] 19/20 seemingly [1] 60/17 seems [1] 59/9 seen [2] 50/1 67/22
		S		
		Saatchi [1] 49/5 said [14] 1/24 14/17 17/18 41/13 53/6 57/13 58/17 59/14 61/19 66/9 71/21 71/25 73/10 74/9 sake [3] 15/15 21/7 23/21 same [3] 43/20 57/9 66/6 satisfied [1] 29/13 save [1] 35/17 saved [1] 70/11 say [10] 15/18 21/8 24/17 52/15 54/21 57/8 59/1 68/11 71/19 74/18 saying [2] 2/12 61/24 says [1] 68/2 scale [1] 12/10 schedule [1] 32/16 science [1] 67/5 scientific [1] 57/18 scientists [1] 66/22 scope [8] 7/4 11/8 15/16 17/2 28/17 37/24 38/17 47/1 scopes [3] 38/1 39/2 39/7 Scotland [57] 1/5 1/21 2/23 3/7 3/9 8/10 9/3 10/11 10/12 10/13 10/14 10/17 10/20 10/22 10/23 11/3 12/1 12/13 12/20 13/18 16/20 18/22 20/24 21/3 21/24 22/2 23/4 28/10 34/13 34/13 34/15 34/16 35/5 36/4 39/12 39/13 44/24 45/20 47/1 48/17 49/2		

S	side [1] 40/13 sight [1] 57/18 Signal [2] 19/3 21/15 signed [5] 9/11 14/5 15/23 16/8 35/21 significance [2] 21/18 29/6 significant [11] 4/17 10/13 15/21 19/22 21/22 26/17 32/11 35/25 51/3 55/24 71/13 similar [6] 7/10 13/19 18/9 28/7 38/1 45/25 Simon [1] 3/6 simply [4] 19/1 26/22 65/11 66/22 simultaneously [2] 43/23 50/19 since [9] 3/4 4/3 5/1 5/22 11/9 52/8 68/5 68/7 72/19 sitting [1] 65/16 situation [1] 65/7 Six [1] 5/13 size [1] 68/18 slightly [2] 53/7 68/3 slow [1] 69/17 slowly [1] 17/20 small [1] 53/21 Smith [2] 3/2 11/20 so [32] 5/19 6/8 7/8 13/13 15/18 17/5 23/25 24/2 29/14 30/9 30/14 32/12 32/15 36/8 37/7 38/18 39/3 39/23 40/14 51/1 51/5 51/17 52/17 52/24 55/9 59/3 59/4 67/23 68/2 68/17 74/2 74/24 social [3] 10/1 56/23 57/10 social media [1] 56/23 society [2] 8/7 10/21 solely [1] 33/25 solicitor [3] 6/12 7/20 36/21 solicitors [1] 68/7 some [30] 2/3 2/4 5/18 9/2 12/13 17/3 17/17 19/19 19/20 20/22 22/24 23/15 26/5 26/23 35/4 36/12 36/13 38/11 38/20 40/3 40/10 41/6 42/25 50/1 58/17 64/7 65/2 67/15 69/25 74/16 something [4] 3/18 24/7 58/12 59/5 soon [5] 19/19 20/9 30/3 49/15 74/5 sorry [2] 55/19 59/1 sought [9] 11/6 17/3	17/4 22/4 22/7 28/3 39/2 51/17 69/10 south [1] 55/2 space [1] 4/20 speak [2] 49/12 70/7 special [1] 56/20 specific [1] 6/14 specifically [2] 47/18 65/7 specification [1] 17/3 speed [1] 13/20 spelled [1] 13/8 spoken [2] 3/19 47/16 Sport [1] 42/6 staff [2] 49/12 70/21 stage [3] 16/13 24/24 49/8 stages [3] 66/17 73/4 73/21 standalone [1] 7/24 start [3] 1/8 44/1 56/2 started [2] 37/7 72/19 starting [1] 8/20 state [4] 10/12 26/10 35/5 56/25 stated [4] 15/11 31/21 58/25 59/11 statement [11] 1/11 7/19 9/17 25/12 26/25 35/4 37/13 43/4 48/7 69/23 76/3 statements [50] 5/5 7/12 8/25 9/9 9/11 9/15 10/7 11/4 11/6 12/3 12/23 13/9 14/2 14/6 14/21 14/24 16/22 16/23 17/12 22/14 22/25 26/25 27/5 33/14 33/15 33/16 33/17 33/22 33/23 33/23 34/22 35/1 35/8 35/15 35/20 35/22 37/9 37/16 39/23 40/1 41/11 43/6 55/15 55/18 64/20 68/6 68/16 68/17 68/20 69/7 status [2] 3/4 3/13 statutory [1] 74/5 steps [8] 19/25 20/4 27/17 28/24 58/16 61/4 61/6 61/12 stepwise [1] 44/14 stick [1] 73/22 still [7] 19/16 19/20 25/25 27/25 28/2 29/5 39/23 Stirling [1] 45/22 stop [2] 61/5 63/21 stored [1] 71/6 stories [1] 48/15 story [16] 5/14 32/2	48/9 48/13 48/21 48/24 49/1 49/2 49/6 49/11 51/23 53/23 53/23 59/2 59/6 63/10 strategy [1] 9/17 streamed [1] 2/7 Street [2] 4/11 59/23 stress [1] 64/25 stressed [1] 35/11 strict [2] 73/13 73/22 strictly [1] 37/13 stronger [1] 56/15 structural [3] 46/21 46/23 48/2 structure [1] 9/21 structures [6] 9/7 39/11 42/20 45/11 46/8 48/2 STUC [1] 10/21 Sturgeon [3] 11/16 34/23 42/3 subject [4] 19/21 23/8 33/5 44/25 submission [10] 2/17 2/21 2/24 15/10 19/11 23/16 30/8 41/7 65/17 67/22 submissions [14] 6/7 53/6 53/22 54/8 67/12 67/18 72/15 74/19 74/21 74/22 74/23 75/5 76/6 76/10 submit [2] 6/6 71/11 submitted [2] 48/19 74/20 subsequent [2] 32/25 49/19 substantial [1] 55/8 substantive [6] 14/20 34/7 35/9 49/23 54/22 61/10 substantively [1] 20/7 successfully [1] 50/21 such [30] 7/8 11/23 20/22 22/5 22/11 22/24 23/2 23/18 23/24 24/1 25/13 25/22 26/3 26/9 28/4 29/20 31/7 37/16 38/22 41/7 47/17 51/2 58/2 60/11 62/7 67/9 70/4 70/20 70/25 74/21 suffer [1] 49/21 suffered [3] 8/7 49/21 73/20 suffering [1] 73/19 sufficient [2] 25/8 35/20 sufficiently [1] 13/17 suggest [5] 7/3 23/2 30/14 43/12 56/14	suggested [1] 51/10 suggestion [1] 62/4 suggestions [2] 40/23 41/6 suitable [1] 4/4 summary [2] 27/23 33/10 summer [1] 37/25 Sunday [2] 58/20 59/1 Sunday Mail [1] 59/1 supplement [1] 6/12 supplemental [1] 16/4 supplementary [1] 9/15 supplied [1] 61/16 support [4] 49/5 63/13 63/24 72/20 supported [2] 16/24 58/4 supporting [3] 14/3 34/8 34/11 sure [1] 67/22 surprise [2] 58/17 72/24 surprised [1] 55/7 surprising [1] 26/8 swift [1] 27/22 swiftly [3] 14/25 36/5 55/22 Swinney [3] 11/16 34/24 42/5 system [4] 15/7 20/3 70/12 71/2 systems [4] 24/9 25/13 26/4 27/24
			T	
			table [8] 15/5 25/20 26/19 26/22 27/1 57/5 58/17 61/16 take [20] 3/24 4/3 4/9 6/9 23/7 27/17 42/11 49/2 50/6 51/7 53/12 54/3 57/18 58/16 61/11 64/3 66/6 68/2 73/23 74/2 taken [16] 7/8 8/16 10/19 15/8 21/9 23/25 28/24 31/23 32/3 50/3 55/1 63/5 63/12 65/1 67/2 67/4 taking [3] 54/4 54/23 57/19 task [1] 68/18 Taylor [1] 47/6 Taylor-Robinson [1] 47/6 team [28] 1/16 4/4 4/17 6/12 7/20 9/14 12/6 13/22 18/6 18/13 18/18 19/13 20/8 22/21 25/10 25/20	

T	27/23 31/3 36/8 53/20 54/1 55/16 56/12 57/21 58/7 58/18 60/14 61/7 64/19 68/1 68/16 68/24 69/11 71/8 72/15	those [53] 1/19 2/8 4/6 4/14 4/22 7/13 8/10 13/8 13/22 14/1 14/3 15/19 18/20 19/16 20/20 20/23 34/3 35/6 36/7 36/24 37/12 37/18 37/23 38/22 40/8 40/19 41/21 43/13 45/1 52/2 52/10 52/11 52/15 53/8 53/24 54/19 54/24 55/10 56/22 57/1 59/18 64/15 65/25 67/12 68/21 69/18 70/17 72/8 73/7 74/2 74/14 74/21 74/22	69/4 told [3] 31/3 57/14 61/17 Tom [1] 47/4 tone [1] 49/19 too [3] 13/15 30/9 56/1 took [4] 2/1 50/12 61/4 61/6 tools [2] 72/5 72/8 top [1] 73/8 topics [1] 50/8 total [4] 11/12 18/18 25/21 33/11 touched [1] 60/15 towards [1] 9/1 Trades [3] 3/11 3/12 34/16 Trades Union [3] 3/11 3/12 34/16 trailed [1] 38/2 trajectory [1] 39/13 tranches [2] 18/18 35/24 transferred [1] 71/1 transient [1] 70/20 transparency [2] 46/10 60/1 transparent [1] 64/2 transpires [1] 19/9 transport [1] 4/13 Tribunal [2] 10/17 34/17 tribute [1] 52/25 tried [1] 40/13 truly [1] 68/18 truth [1] 59/16 try [3] 12/18 19/13 43/15 trying [1] 41/22 turn [2] 67/16 69/19 turns [1] 67/6 two [10] 5/5 18/18 29/24 30/5 46/13 50/12 50/18 51/2 52/3 65/20 two weeks [1] 30/5 types [1] 17/3	ultimate [1] 8/16 ultimately [4] 19/6 38/12 39/21 68/16 Una [1] 3/8 unanswered [2] 16/12 56/13 unclear [1] 31/6 unconfirmed [1] 31/6 uncontroversial [3] 42/16 42/25 43/3 uncooperative [1] 69/17 uncover [3] 10/23 13/4 29/11 under [4] 23/19 26/13 60/10 66/25 underestimate [1] 73/9 underestimated [1] 68/18 understand [8] 27/15 31/21 57/22 63/4 63/11 67/3 71/11 73/5 understanding [3] 29/8 38/17 50/17 understands [1] 69/3 understood [2] 29/18 32/10 undertaken [5] 4/8 5/1 7/10 22/12 49/1 undoubtedly [1] 18/4 unexpected [1] 74/25 unfamiliar [1] 30/22 Union [3] 3/11 3/12 34/16 United [1] 39/5 University [5] 10/24 45/2 45/10 45/22 47/10 unless [3] 14/25 55/22 74/25 unlikely [1] 58/19 unofficial [1] 58/8 until [6] 23/24 29/13 39/24 42/6 49/4 69/4 up [6] 4/5 10/24 33/2 61/16 64/16 66/8 update [11] 3/20 5/5 5/16 6/2 7/12 7/20 30/24 44/17 44/20 48/12 55/8 updated [2] 33/6 48/18 updates [2] 5/21 6/13 uploading [1] 20/2 upon [6] 22/10 24/21 41/17 44/7 68/2 73/5 urged [1] 21/20 us [10] 2/5 2/19 19/7 21/8 21/25 25/17 40/23 61/17 61/18 62/9 usage [6] 20/22
team... [12] 30/1 32/24 36/5 38/8 40/3 40/17 50/4 52/25 68/7 73/1 74/4 74/6 team's [1] 37/2 teams [6] 14/14 21/15 36/21 50/3 50/7 50/8 Telegram [1] 19/3 tend [1] 30/14 term [3] 21/7 21/8 57/9 terminology [1] 57/9 terms [3] 26/14 57/5 62/20 testimony [1] 7/18 texts [1] 21/14 than [8] 8/4 17/20 52/17 55/24 56/2 59/11 64/21 72/14 thank [11] 53/10 54/6 55/7 67/14 72/11 72/12 72/14 72/14 72/18 75/3 75/6 thank you [4] 72/11 72/14 75/3 75/6 thanks [2] 36/6 52/10 that [257] That's [1] 75/2 their [46] 2/12 2/12 2/14 6/11 8/14 11/5 12/5 12/11 12/12 12/23 14/6 14/14 14/16 16/23 20/17 21/2 25/13 25/21 26/15 27/4 27/6 38/6 38/24 40/7 41/2 41/7 41/11 41/18 45/24 47/19 48/1 48/13 49/13 52/11 53/3 53/8 57/20 59/19 60/9 61/1 61/5 63/2 66/3 66/7 72/15 73/8 them [28] 6/13 7/22 9/13 13/17 14/7 15/14 18/16 19/5 25/8 29/10 31/24 32/8 32/9 40/4 40/5 40/12 43/14 49/20 52/12 57/20 58/1 63/7 63/11 64/21 71/17 72/6 72/10 73/25 thematic [1] 42/15 theme [1] 26/2 themselves [3] 22/3 22/22 70/5 then [8] 20/5 28/15 53/13 62/16 69/7 70/23 71/15 73/25 there [28] 2/10 4/14 11/24 14/22 16/12 18/1 19/1 25/2 27/6	there's [1] 61/9 therefore [2] 59/3 69/7 these [61] 6/22 8/5 8/8 8/18 8/21 9/4 9/11 9/16 10/7 11/6 11/7 11/11 11/13 11/18 12/3 14/15 14/24 16/8 16/22 17/8 17/13 18/4 18/17 18/18 19/18 22/19 22/21 24/8 27/1 27/24 28/16 28/20 29/7 29/25 30/2 30/5 32/21 36/3 39/18 42/18 42/24 46/13 47/2 47/11 52/3 55/20 55/25 57/10 58/14 58/15 59/2 61/3 65/1 65/6 68/12 70/6 70/8 70/11 70/18 71/12 71/24 they [66] 3/18 6/6 6/8 7/3 7/5 8/15 9/5 12/16 12/20 12/24 13/2 13/3 13/4 14/25 15/17 15/24 21/24 22/6 22/23 25/23 25/24 26/1 26/1 26/14 26/21 27/10 29/19 30/3 31/25 36/2 36/25 37/3 37/17 40/24 41/8 41/20 42/24 47/23 50/16 51/4 53/2 55/22 58/4 61/4 61/6 61/20 63/8 65/7 65/9 65/25 65/25 66/25 69/8 69/8 70/18 70/22 71/14 73/2 73/14 73/16 73/17 73/24 74/7 74/11 74/13 74/21 they're [1] 70/22 thing [5] 19/11 24/5 29/2 29/11 61/25 things [3] 9/19 13/7 61/17 think [6] 24/19 37/3 53/12 68/11 71/19 74/24 thinking [2] 3/22 41/3 third [2] 1/4 1/24 this [102] Thomas [3] 45/2 46/5 46/6 Thomas' [1] 46/16 thorough [3] 62/15 73/2 74/6 thoroughness [1] 13/21	though [5] 9/7 13/24 19/19 29/3 53/7 thought [3] 16/6 58/19 64/11 thousands [3] 18/19 48/19 68/15 threats [1] 13/18 three [6] 3/25 5/7 16/14 41/7 41/9 56/2 three months [1] 56/2 three weeks [1] 3/25 through [5] 22/20 36/2 40/7 67/23 68/25 throughout [2] 39/16 53/25 Thursday [1] 1/1 thus [8] 20/21 30/17 38/11 38/24 39/9 43/24 56/18 66/13 tight [1] 12/7 time [27] 4/4 11/9 11/15 11/19 13/15 14/6 14/19 19/20 20/22 22/23 25/1 25/8 28/22 30/4 35/20 39/6 44/9 51/7 54/3 61/9 62/7 62/15 64/18 65/21 66/6 69/14 72/22 timeframe [1] 69/1 timeline [1] 39/9 timelines [1] 13/9 timely [1] 35/10 timeously [1] 56/4 times [2] 73/12 73/14 timescales [3] 14/12 30/13 43/24 timetable [6] 12/7 12/9 13/13 73/13 73/15 73/23 timings [1] 44/15 today [8] 3/20 6/8 65/16 67/21 69/18 72/1 72/7 72/7 today's [1] 31/1 together [2] 9/13		

U	21/20 23/22 23/22 24/6 24/10 24/10 24/24 27/1 27/1 27/24 29/17 29/22 30/5 31/16 35/1 37/25 38/2 38/4 38/9 39/1 39/5 45/8 45/15 45/16 46/7 46/11 46/15 46/16 48/14 48/18 50/15 51/24 57/22 57/24 58/8 58/11 58/19 58/21 59/9 61/7 61/18 61/18 61/19 62/22 70/14 70/25 72/2	whatever [2] 19/3 27/21 WhatsApp [11] 19/2 20/11 20/15 21/10 23/2 23/11 28/11 28/15 58/5 58/23 59/7 WhatsApp [10] 21/7 22/1 26/20 56/23 57/8 57/8 58/9 58/18 59/2 61/20 whatsoever [2] 19/1 69/16 when [9] 24/5 27/10 28/17 30/4 30/11 53/13 57/8 60/13 69/22 where [11] 8/1 15/6 15/25 27/25 35/1 37/13 51/11 61/7 65/8 66/5 66/24 whereby [1] 43/16 whether [8] 26/12 27/9 31/6 58/4 63/20 66/18 66/20 66/22 which [118] while [2] 51/23 61/9 whilst [1] 35/23 who [43] 1/19 2/17 2/20 3/3 3/10 3/12 4/14 4/22 7/13 7/15 12/17 12/21 12/22 14/1 16/18 17/7 19/16 22/17 25/10 28/8 28/12 31/5 36/7 40/9 40/19 44/22 47/16 49/21 52/2 52/10 52/11 52/16 53/1 53/8 53/25 55/10 57/24 58/4 59/19 64/1 67/4 74/2 74/21 whom [7] 25/24 29/19 35/5 41/20 42/7 52/25 64/10 whose [4] 4/7 23/13 47/18 47/20 why [13] 13/3 15/20 16/12 19/10 26/1 26/12 27/1 27/10 28/2 32/21 56/12 56/22 71/11 wide [3] 21/15 49/10 73/19 widespread [2] 60/17 71/13 will [125] wish [10] 4/14 4/23 7/3 19/10 24/22 36/6 52/2 64/25 66/4 71/19 wished [2] 6/8 24/6 within [26] 7/4 9/5 10/24 11/11 14/11 15/13 17/2 17/8 22/18 23/1 26/10 30/10 30/19 32/8 34/6 45/12	46/25 52/8 68/22 69/1 69/12 70/7 70/12 70/15 71/4 71/13 without [6] 15/25 16/9 28/15 57/19 57/25 62/12 witness [25] 14/21 14/23 15/5 15/14 15/17 16/6 16/11 22/25 27/5 35/1 35/20 37/9 37/13 37/16 40/1 40/7 40/16 43/17 43/18 43/24 55/14 55/17 64/10 64/20 68/17 witness's [1] 26/24 witnesses [35] 5/12 5/13 15/3 15/20 25/21 26/23 27/4 28/8 29/17 29/19 30/21 31/1 35/18 37/21 39/19 39/21 40/4 40/12 40/14 40/18 40/23 43/12 44/7 44/19 48/6 56/11 61/4 61/20 64/5 64/22 64/23 64/25 65/2 65/6 68/25 women's [1] 3/3 Woods [1] 2/25 words [3] 72/7 72/20 72/22 work [32] 2/8 2/13 3/21 4/6 4/8 4/25 6/3 7/16 9/19 10/7 13/7 14/11 14/18 16/19 18/10 36/1 36/20 36/24 37/18 51/9 51/18 52/11 52/17 64/3 65/21 69/4 69/5 69/6 71/21 71/22 72/20 73/25 worked [5] 12/17 14/14 17/7 22/18 28/13 working [9] 1/17 12/1 12/9 30/13 36/5 48/23 50/6 53/1 68/22 worst [2] 73/4 73/20 would [26] 18/20 19/9 25/7 29/2 30/10 30/14 30/14 52/9 52/23 53/25 54/21 55/25 58/3 58/3 58/7 58/14 58/15 59/12 59/24 61/11 61/14 65/5 68/1 68/11 71/11 74/1 writing [3] 40/13 64/21 74/20 written [15] 2/17 2/21 2/24 5/23 6/7 7/18 13/9 16/22 23/16 40/3 41/11 47/21 53/6 67/22 69/2	wrong [2] 52/23 62/10 wrote [2] 31/15 62/21
usage... [5] 21/25 25/13 25/22 27/6 27/24 use [11] 9/6 22/5 26/20 46/11 52/21 60/18 61/5 70/16 72/6 72/8 74/5 used [12] 4/15 4/21 8/9 8/18 21/8 21/11 23/3 26/4 38/22 70/9 70/18 70/19 useful [2] 26/17 52/7 usefully [1] 72/16 using [4] 57/9 65/9 66/8 71/12 usual [2] 5/25 30/13 utmost [4] 54/19 56/3 69/14 74/12	watched [1] 4/24 Watson [1] 47/5 way [6] 5/24 21/19 62/3 70/10 72/13 74/18 ways [1] 48/12 we [110] we're [3] 54/11 56/17 65/17 weaknesses [1] 13/4 web [1] 48/18 weeks [2] 3/25 30/5 welcome [2] 38/25 56/11 well [10] 9/21 13/10 32/9 37/1 44/25 50/15 55/9 56/6 58/4 59/9 Wenham [1] 47/5 were [68] 6/6 8/12 8/15 8/18 8/25 9/4 9/5 9/7 9/11 12/16 12/20 12/21 13/3 16/17 16/21 22/6 22/8 22/9 22/11 22/15 22/17 22/22 23/3 24/6 24/15 25/2 26/4 26/14 27/10 29/24 30/5 31/23 31/25 38/6 46/4 46/24 47/12 50/14 50/16 52/22 56/22 56/23 57/17 57/25 58/18 61/8 61/18 63/5 63/8 63/9 63/12 64/8 64/14 66/8 66/22 66/23 66/25 66/25 67/2 67/4 68/11 68/19 70/10 70/11 70/18 70/19 71/4 73/24 Westminster [2] 21/20 63/20 what [34] 13/14 15/3 18/2 19/6 21/8 24/19 25/25 27/17 27/24 27/25 28/1 29/3 29/5 38/23 44/15 52/14 57/12 57/13 61/4 61/6 61/12 61/18 63/22 66/23 67/3 67/5 67/5 68/2 68/4 70/19 71/8 71/9 71/10 71/10	Y		
V	valid [1] 67/15 various [5] 17/7 19/25 30/25 50/8 72/21 vast [4] 29/19 35/21 39/25 41/1 ventilated [1] 32/5 venue [3] 4/11 4/15 4/18 venues [1] 4/5 very [26] 19/12 20/25 23/17 23/24 26/6 27/1 53/3 53/10 54/6 54/22 55/12 64/9 67/14 67/15 67/23 68/12 68/12 68/20 69/18 72/12 72/18 72/25 74/19 74/24 75/3 75/5 via [3] 24/8 26/3 30/7 video [1] 49/22 view [1] 38/22 views [1] 8/14 village [1] 66/24 visible [1] 32/8 vital [1] 63/18 voices [1] 48/25 volume [2] 35/25 68/13 volumes [1] 26/10 voluminous [1] 30/12 voluntarily [1] 28/14	YouTube [1] 2/7		
W	wait [1] 26/25 waive [3] 31/12 32/13 63/25 waiver [3] 31/9 32/23 51/13 want [1] 55/4 warned [1] 59/20 was [49] 17/2 17/4			