

Monday, 6 November 2023

1
2 (10.30 am)
3 **LADY HALLETT:** Ms Cecil.
4 **MS CECIL:** Good morning, my Lady. May I please call
5 Clare Lombardelli.
6 **MS CLARE LOMBARDELLI (affirmed)**
7 **Questions from COUNSEL TO THE INQUIRY**
8 **MS CECIL:** Thank you, Ms Lombardelli. If you could just
9 state your name, please.
10 **A.** Clare Lombardelli.
11 **Q.** Thank you. A few preliminary matters, if I may.
12 Firstly, can I invite you to keep your voice up.
13 Secondly, you may have noticed that people are taking
14 a note, including a stenographer, actually, so we will
15 take things a little more slowly than we might otherwise
16 do. I'm particularly bad at going fast, I'm afraid, so
17 I will try to slow down, and if you can do the same.
18 And please do ask me to repeat anything if it's not
19 clear or if you don't understand a question.
20 As I say, thank you for attending today and
21 assisting the Inquiry. You have provided an 18-page
22 statement to the Inquiry that ends INQ000251931. As we
23 can see at the outset, it states that it's dated
24 22 August 2023, but if we go to the last page, at
25 page 18, that's the page that contains a declaration of

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1 the Treasury, the Bank of England, the Office for Budget
2 Responsibility, the ONS, the Debt Management Office.
3 I was responsible for liaising, on behalf of the
4 Treasury, with all of those functions.

5 I also jointly ran the Government Economic Service
6 during this period.

7 **Q.** Thank you. I'm going to break those down in a little
8 bit in due course --

9 **LADY HALLETT:** If you could go more slowly.

10 **MS CECIL:** Sorry.

11 **LADY HALLETT:** Don't worry.

12 **MS CECIL:** But you will be aware that there are a number of
13 later modules that are going to be dealing with various
14 aspects of the Treasury's response to the pandemic, and
15 for today and for the purposes of Module 2, we're going
16 to be exploring some of the economic analysis that you
17 were involved in and the modelling at a high level, the
18 input of the Treasury into core decision-making, some of
19 the different schemes, and then also consideration of
20 the economic version of SAGE or something of that
21 nature. So just so that you know where we're going.

22 There are also a number of other witness statements
23 that have been provided by various officials and civil
24 servants, and indeed ministers, within the Treasury, and
25 of course the Inquiry will have regard to those as well.

3

1 truth at the bottom, the statement of truth, and it's
2 dated 23 August of 2023. It's just a typo on the first
3 page.

4 If I can just confirm with you that everything
5 within your witness statement is true?

6 **A.** Yes.

7 **Q.** Yes, thank you.

8 Now, you are now the chief economist of the OECD,
9 and I understand that you took up that position in May
10 of 2023, earlier in year?

11 **A.** That's right.

12 **Q.** But your statement and indeed your evidence today is
13 concerned with the role that you played during the
14 pandemic, and if I can just ask you: what was your role
15 during the pandemic?

16 **A.** So I was the chief economic adviser at the Treasury
17 during the pandemic, and that role consisted of a number
18 of things. So I was responsible overall for the
19 economic analysis that the Treasury did and fed into the
20 process for Covid, responsible for all of the economic
21 matters in that sense, not the policies I should say.

22 I also was responsible for liaising across the -- we
23 have a sort of macroeconomic framework in the public
24 sector that provides advice, analysis and takes
25 decisions on economic policy, that is a combination of

2

1 So if I can just deal, then, briefly, if I may, with
2 your role as the chief economic adviser. You touched on
3 it when you just described the various aspects in terms
4 of your remit, but effectively you're the primary
5 adviser to the Chancellor, is that correct, on
6 macroeconomic and fiscal issues?

7 **A.** Correct, on macroeconomic and fiscal issues, yes.

8 **Q.** If you can just break it down for the assistance of
9 those that are following, what are macroeconomic issues
10 and what are fiscal issues?

11 **A.** Of course. Macroeconomic issues are basically the
12 economy as a whole and the elements within that, so
13 things like the level of activity, the amount of
14 unemployment, inflation, those sorts of cross-economy
15 issues, looking in detail at things like the labour
16 market and the like.

17 Fiscal issues are basically the overall level of
18 government spending, taxation and borrowing in the
19 economy, and so overall this is a sort of focusing on
20 the big picture of overall what is happening in the
21 economy.

22 **Q.** Thank you.

23 In relation to your role, prior to becoming in fact
24 the director general and the chief economic adviser, you
25 were the director of strategy, planning and budget; is

4

1 that right?

2 **A.** That's correct.

3 **Q.** That has a slightly different role and remit within the

4 Treasury?

5 **A.** Yes.

6 **Q.** And is far more policy based?

7 **A.** Yes. The director of strategy, planning and budget

8 basically oversees the budget process in the Treasury,

9 and what they do is they co-ordinate the Treasury's

10 policies for the budget, and that would mean liaising

11 with all the different teams in the budget for fiscal

12 events, and actually during Covid that was the team that

13 co-ordinated the Treasury's response to Covid and also

14 interacted with the sort of -- the rest of the

15 government who was dealing with, you know, the

16 decision-making and the process, so they would have been

17 the primary contact, for example, for the

18 Cabinet Office.

19 **Q.** Indeed. In short, the Treasury uses a group structure

20 to organise its work, and that is one of the primary

21 groups, and as you said led on the Covid-19 work?

22 **A.** That's correct.

23 **Q.** Thank you.

24 Alongside that, you also oversaw the work of the

25 economics group, so a separate group --

5

1 are -- you know, I could break it down into probably

2 five areas in terms of what we were looking at.

3 There was data and analysis what was going on, and

4 where we got that.

5 There was the modelling that we undertook at the

6 Treasury, and with others.

7 We did a lot of, as I mentioned at the start,

8 working with other aspects of the system across the

9 public sector, who were also doing data analysis and

10 modelling, so we shared our information and knowledge

11 there.

12 We did a lot of looking at other countries, what

13 other countries were doing, because, you know, in some

14 cases, unfortunately, they were further ahead in the

15 virus and so we could learn from them.

16 And also some external -- we talked a lot to

17 externals outside the public sector.

18 But in terms of modelling and data analysis, you're

19 right, there's this interdependency between the two.

20 **Q.** And, indeed, the questions I'm going to ask you

21 predominantly focus on those two areas. Other aspects

22 are for later modules, effectively.

23 But just perhaps to touch on those very briefly, you

24 reference international work that was being undertaken.

25 Her Majesty's Treasury, as I say, as it was at the time,

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1 **A.** Yes.

2 **Q.** -- to the planning -- strategy, planning and budget

3 group, and that was also heavily involved, is that fair

4 to say, in the Treasury's response?

5 **A.** Yes, heavily. The economics group was the group that

6 brought together the overall economic analysis of Covid,

7 what was happening and made those assessments.

8 **Q.** Indeed, in your capacity there you attended various

9 cross-governmental meetings, including those with the

10 Chancellor and, on occasion, with core decision-makers

11 such as the Prime Minister; is that right?

12 **A.** Yes, I attended cross-government meetings where the

13 economic analysis or evidence would have a particular

14 role in the meeting or its interpretation.

15 **Q.** Now, if I may turn to the broader approach within

16 Her Majesty's Treasury as it was at the time, with

17 regard to economic analysis and modelling, just touching

18 briefly if I may on data analysis first of all.

19 I appreciate that in your statement you set out there is

20 data analysis and then there is also the economic

21 modelling tools that were utilised, you explain they're

22 distinct but there is a significant amount of overlap;

23 is that fair to say?

24 **A.** Yes, that's correct. I mean, I would say we -- overall

25 for the economic analysis that we did, I think there

6

1 also utilised the IMF, the International Monetary Fund,

2 the OECD, other forms of data in that respect of

3 modelling?

4 **A.** That's right. That's right.

5 **Q.** If I may then turn to data and evidence, and if I can

6 call up page 5 of your statement, and paragraph 14, you

7 explain the changes that took place with regard to data.

8 As I say, it's at paragraph 14 at the top and you

9 explain that:

10 "Due to the speed, scale, and scope of the economic

11 impact of the pandemic, at the beginning of the

12 pandemic, we supplemented the traditional economic data

13 with additional data sources that were already available

14 and gave a more rapid and real-time picture of economic

15 activity."

16 You then go on to give some examples such as

17 Google Maps, Citymapper, OpenTable, effectively

18 restaurant booking data, those types of things there.

19 You then talk separately about credit card usage, so

20 spending, in short term, with regard to the economy.

21 Now, in respect of all of those types of data, did

22 Her Majesty's Treasury consider data on social health

23 impacts alongside this? Was that a form of data that

24 was also being collated and fed it, or was it very much

25 based on, as I say, the more economic position?

8

1 A. The Treasury and our analysis was more based on the
2 economics. I mean, that is our sort of area of
3 expertise and knowledge. Other departments will have
4 been looking at other data sources.

5 What we did do is we very closely used and were
6 aware of the data on health and the data what was coming
7 out of the Department of Health, and related, on how the
8 virus was developing, because of course that was having
9 an impact on the economy. But on the sort of more
10 social issues -- I mean, we would also have,
11 for example, looked at schools, insofar as -- because we
12 were doing modelling, for example, what would happen and
13 how -- you know, the proportion of parents in the labour
14 market. So there was lots of evidence early on,
15 certainly before restrictions were brought in, that
16 people were beginning to adapt their behaviour anyway,
17 and that's why we were looking at some of these
18 indicators like Google Maps, Citymapper, OpenTable, but
19 a much wider range, to try to work out what behaviours
20 people were doing irrespective of whether or not there
21 were any restrictions, just in response to the virus and
22 their fear of the virus.

23 So we looked at a range -- I mean, some of these, as
24 you see, are not economic data sources in and of
25 themselves, I mean, in a sense, Google Maps is a social

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1 A. Yes, I mean, modelling is always a challenge, I should
2 say. I mean, very much -- with modelling you sort of
3 get out, you know, what -- the occupants you get are
4 a function of what you put into it, and there's always
5 a lot of uncertainty about the economy, but at this
6 point -- well, throughout the entire pandemic the level
7 of uncertainty was obviously much higher than typical
8 economic modellers would be used to.

9 Q. Indeed. And that uncertainty resulted in modelling
10 perhaps not being utilised to the same extent as it had
11 been previously, would that be fair?

12 A. I wouldn't say it wasn't used as much as it had been
13 previously, we did actually use quite a lot of
14 modelling. I would say it was a less reliable source of
15 information than the data and the information and
16 analysis of what was actually happening in the economy,
17 because, you know, if you think about what economic
18 and -- modelling tends to do, what it does is it looks
19 at existing relationships between variables and it
20 sort of tries to apply those going forward. What was
21 happening in the pandemic is very -- the very basics of
22 the economic relationships that we have were changing
23 and were coming under pressure. So previous estimations
24 of, you know, for example, the relationship between
25 unemployment and output would be very different under

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1 data source as well, so, you know, insofar as -- insofar
2 as -- insofar as data was useful to tell us about the
3 economy, we looked at it, even if it wasn't hard
4 economic data, if that makes sense.

5 Q. Would it be fair to say or a fair analysis that it was
6 really looking at things such as, as you say, impact on
7 workforce, those sorts of aspects, impact in terms of
8 socialising, spending within the economy, whether that
9 be restaurants, bars, and patterns of movement and
10 transport, those sorts of issues?

11 A. Yeah, I would say workforce and economic activity. Some
12 of these issues were more about, like you say, the
13 spending -- the card spending data, for example, is just
14 the level of economic activity in the economy.

15 We were also, I should say, and I reference it
16 there, talking a lot to the Department for Business, who
17 will have had a lot of information, at this point
18 probably quite soft information, so, you know,
19 conversations and the like, but they would have had
20 intelligence on what was happening at businesses as well
21 and how businesses were looking at this.

22 Q. Thank you.

23 I now want to move to modelling, and modelling posed
24 particular challenges for HMT during the pandemic, would
25 you agree with that?

10

1 these sorts of circumstances. So I wouldn't say we used
2 it less. We did actually use it quite a lot. It was
3 a less reliable source of information, there was a lot
4 more uncertainty around it that there normally would be.

5 Q. And certainly a lot less emphasis, therefore, placed on
6 those models?

7 A. That's right. We wouldn't have used it as, for example,
8 a reliable basis on which you could solely -- solely
9 decide policy. We were -- so you -- it's very important
10 to supplement it with lots of other information to give
11 you a fuller picture.

12 LADY HALLETT: It's very difficult to change one's speech
13 pattern, but if you could slow down.

14 A. Sorry.

15 LADY HALLETT: Thank you.

16 MS CECIL: Thank you.

17 Part of that was as a consequence of the
18 pre-pandemic position, in that there had been very
19 limited consideration given to the consequences in terms
20 of modelling or data collection or those sorts of issues
21 with respect to a pandemic situation. I think you set
22 out that, don't you, at page 7, paragraph 24 of your
23 statement, and that, as a consequence, had limitations
24 then for modelling in the pandemic, because there was no
25 playbook, as you described it?

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1 A. That's right. We didn't have a pre -- a sort of --
2 a model -- we didn't -- going into the pandemic we
3 didn't have a model of, you know, how a pandemic would
4 affect the economy.

5 As I set out in the -- in my statement, it would
6 have been incredibly difficult to do that, because the
7 impact that the pandemic had on the economy was very
8 much dependent on the particular parameters of that
9 pandemic, the rate of transmission and those sorts of
10 things. So it would have been very difficult in advance
11 to know what those would have been.

12 Q. And indeed you gave a speech on 29 June last year at
13 King's College and in that you describe that -- the
14 purpose of that was because you wanted to share how you
15 did not have that ready-made toolkit to hand to model
16 the effects of lockdown, and effectively the known
17 unknowns were a formidable barrier to any reliable
18 predictive capability.

19 If I can just pull up your speech for a moment at
20 page 6, and it's INQ000088016. Page 6, please.

21 I'm looking halfway down the page, and this is where
22 you've already touched upon the uncertainties that you
23 were faced with as a consequence, the models not
24 being -- certainly the Treasury not being as confident
25 in the outputs effectively.

13

1 modelling. One of the examples I referenced earlier
2 was, for example, if you were to close schools you can
3 from that understand, if you look at where parents work
4 in the economy, for example, you can see what the impact
5 of that would be if they can no longer work, and those
6 sorts of things. But what there wasn't was an estimate
7 of, you know, the lockdown will cost X in terms of jobs
8 or economic activity.

9 Q. Indeed, and that's the first reason you explain, and as
10 we can see from that you explain that there is also no
11 reasonable counterfactual. So against that, similarly,
12 in terms of the overall economic cost of lockdown
13 there's no modelling of the overall economic cost of not
14 locking down.

15 A. That's right.

16 Q. It's fair to say that there is no neutral option when it
17 comes to making a choice; each choice, whether it's
18 lockdown or not, would have a consequence?

19 A. That's right. And as I mentioned at the start, what we
20 saw was, even before restrictions were being considered,
21 people were adapting their economic behaviour, and they
22 were adapting it quite substantially and that was having
23 an impact on economic activity, on particular sectors in
24 the economy, and you like. So it would have been
25 incredibly difficult -- as you say, in the absence of

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1 What you explain here is that:

2 "The uncertainty meant it was not possible to
3 meaningfully model the overall 'economic cost of
4 lockdown' for two reasons."

5 You go on:

6 "First -- to estimate the cost of an intervention,
7 you have to know what would happen in the absence of
8 that intervention. It wasn't possible to know what
9 would have happened to the virus if there had been no
10 lockdown. And we couldn't have known how the economy --
11 how people and businesses -- would have responded to the
12 virus without a lockdown. There was no reasonable
13 counterfactual."

14 Now, from this, is it right that there was no
15 meaningful modelling of the impact of lockdown,
16 the first lockdown?

17 A. I wouldn't say there was no meaningful modelling. There
18 was a lot of analysis and modelling that happened. What
19 I would say is there was no estimated cost of
20 a lockdown, if you like. There is no way to basically
21 say a cost -- a lockdown will cost you X or, indeed,
22 a lockdown of this form will cost you X but of
23 a different form will cost you Y.

24 But I think it's a bit too far to say there was no
25 meaningful modelling done. There was a lot of useful

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1 a lockdown there would have been a significant economic
2 impact from the virus, and actually there are various
3 estimates of what that might have been, but incredibly
4 hard to put a particular number on it.

5 Q. That's a theme that comes through both in your speech,
6 as we can see when we move on to the second reason that
7 you give, but also more generally within your statement,
8 you speak about the uncertainty of behaviour, of people
9 and businesses, in relation to how they would respond to
10 restrictions, no past episodes to provide reasonable
11 approximations of what the economy and individuals were
12 going through, and you explain a really critical
13 point: the way the economy responded changed over time;
14 you go on to say actually it had an ability to learn and
15 adapt, and you give some examples of that there.

16 But one of the big blocks for the Treasury from your
17 perspective was that of behaviour from individuals and
18 being able to predict behaviour; is that right?

19 A. That's right. That was a huge sort of challenge to the
20 analysis and -- the inability to estimate precisely what
21 the impacts would be. Behaviour was a key driver.
22 I mean, in the economy behaviour is always a key driver
23 of outcomes, and of course it was particularly uncertain
24 at this time, and an important point I make there is
25 that it changed and people's responses to the same

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1 sort of restriction changed over time.

2 **Q.** You also distinguish between voluntary behaviours and
3 compulsory restrictions impacting on behaviour, so
4 effectively the counterfactual position of: if there is
5 not a lockdown what voluntary behaviours would there be
6 in any event, if there is a mandated lockdown then what
7 non-voluntary or restricted behaviours would take place.
8 And that's the same position when it came to the second
9 and third lockdowns as well with regard to being unable
10 to model the overall economic impact of either way?

11 **A.** Yes.

12 **Q.** And indeed the autumn of 2020, when there was
13 consideration of circuit breakers, the same position
14 arose, it was -- Treasury's position was you were unable
15 to calculate out the overall economic impact of
16 a circuit breaker; is that right?

17 **A.** That's right, it would have been impossible to put
18 a specific sort of figure or number on that with any
19 reliability. What we were able to do and what we did do
20 was lots of analysis on the sorts of -- and what the
21 economic impact -- the sorts of economic impacts there
22 could be and what you might see for multiple --
23 you know, for different restrictions.

24 **Q.** If I could just bring up the briefing for the Covid-S,
25 the Covid Strategy Committee, on 21 September 2020.

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1 likely to be impacted by a circuit breaker, high
2 employment sectors with vulnerable workforces. And then
3 finally it goes on to talk about cash conversion, sales
4 revenue and retail.

5 But nowhere in this document is there any analysis
6 of the opposite counterfactual scenario, is there?

7 **A.** It doesn't look like in this particular document, no.

8 **Q.** So what's going to Covid-S is not a position where
9 economic advice is presented: this is the consequence or
10 potential consequences of a circuit breaker now, and
11 here, on the other hand, are the potential consequences
12 if there's no circuit breaker. What we have is the
13 Treasury adopting a clear line in terms of the impacts
14 of a potential circuit breaker, and, as we see,
15 "severe", "catastrophic", that sort of language; is that
16 right?

17 **A.** Yes, I mean, what I -- what I don't know and we don't
18 know is what the specific commission was that this is
19 responding to, and what the other papers that will have
20 been -- and I'm sure the Inquiry would have them --
21 I mean, it obviously would have depended, and there
22 would have been a huge amount of analysis going,
23 I assume, to this decision, around what the impact of
24 the virus would be on the two, and we were providing
25 huge amounts of evidence and analysis throughout this

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1 It's INQ000184589, please.

2 If I can go to the second bullet point, what is said
3 here is:

4 "More generally, we are reaching the limits of what
5 we can do economically, with further measures likely to
6 be catastrophic. We need a strategy that works over the
7 winter period, rather than tinkering with restrictions
8 week to week."

9 If I go to the final page, please, what we have set
10 out there is an annex that deals with the economic
11 impact of the circuit breaker, and it sets out in
12 general terms: it's likely to be severe, reducing
13 revenues rather than costs. It explains about GDP
14 dropping.

15 It continues to go on, and this is some of the
16 uncertainty perhaps that you have already alluded to,
17 that:

18 "Although the exact impact would depend on the type
19 of restrictions imposed, analysis on the monthly effects
20 of the previous lockdown serve as a reasonable proxy and
21 suggest that a 'circuit breaker' will concentrate its
22 impacts on firms already in distress."

23 You go on to speak about hospitality, domestic
24 employers, arts, entertainment and recreation,
25 construction, furlough, sectors effectively that are

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1 period on overall what the impact of the virus was in
2 terms of the impacts on economic activity. So there
3 would have been supplement -- other analysis going on
4 around what the actual, the -- sort of baseline was in
5 terms of the levels of economic activity that were
6 happening at the time, and that would have been affected
7 by the level of the virus at the time.

8 **Q.** Of course. But this is the advice that's going to the
9 Chancellor in relation to his attendance at that
10 meeting, and the line that he ought to be taking at that
11 meeting.

12 Perhaps if we can just call up page 2 of it for
13 a moment. We see at the top:

14 "We suggest you push back strongly on the
15 circuit breaker proposal. The economic impacts would be
16 severe ... firm failures and redundancies ... There is
17 no evidence that a circuit breaker of two-three weeks
18 will only be in force for that long, meaning we could
19 end up lifting restrictions when the health data ...
20 could still be going in the wrong direction because of
21 lag-time."

22 There is a very clear piece of advice here coming
23 out of Treasury to the Chancellor in relation to the
24 circuit breaker that was going to be discussed in that
25 September meeting. Did that reflect the general

20

1 position within Treasury at the time with regard to its
2 approach to lockdowns and circuit breakers, that these
3 were profound measures that had significant impacts and
4 unacceptable impacts on the economy and so needed to be
5 pushed back against?

6 **A.** I think, you know, everyone in the Treasury was
7 incredibly worried about the impacts on health, on,
8 you know, life, and the loss of life, the potential for
9 the NHS to be overwhelmed and the like throughout the
10 pandemic. That -- we were also aware of all the harms
11 that were going to be caused, and what we -- what the --
12 sort of our role in the process was to provide evidence
13 and analysis on the economic impact so that they could
14 then be fed into a wider process in which these issues
15 were sort of weighed up and the decisions decided.

16 The role of the Chancellor was to provide the
17 information about the economy and the economic impact,
18 and so that -- you know, that is what this document and
19 others will have been doing, is provide him with,
20 you know, the evidence on the proposal that was being
21 considered, which was the circuit breaker at this time,
22 and the economic evidence. Other evidence should --
23 you know, would have been provided by others in the
24 process.

25 **Q.** But what you don't have within this paper as an example

21

1 causing damage. Obviously, you know, throughout time
2 and throughout the process that will have varied, but we
3 were very, very aware that the virus itself was a huge
4 problem for the economy and needed to be -- needed to be
5 controlled.

6 **LADY HALLETT:** How did you consider the definition of
7 circuit breaker? Is it short-term lockdown, is that how
8 you would have understood a circuit breaker?

9 **A.** With apologies, I was responsible for the economic
10 analysis that was feeding in. The precise policy that's
11 being considered here I'm not sure -- I mean, I think
12 the general understanding of a circuit breaker was
13 short. I don't know if this particular paper was
14 written in response to a very specific policy proposal
15 or a more general description of a circuit breaker
16 I'm afraid.

17 **MS CECIL:** Perhaps if I can pick up on something else that
18 you've alluded to just a moment ago, that it was
19 essentially for the Chancellor to make the economic
20 case. Was there the view, therefore, that he would be
21 making the economic case, the Health Secretary would
22 make the case in relation to health, and other
23 individuals, then, schools, for example, the Minister
24 for Education? Was it siloed in that way --

25 **A.** No --

23

1 is that counterfactual position or an analysis of other
2 alternative measures.

3 **A.** I think if -- I mean, I haven't seen the whole paper.
4 I'm sure, you know ... what the economic advice would
5 often stress, throughout, was that the virus itself was
6 causing huge economic harm. It may have been in this
7 paper, it may have been in other papers, but we were
8 regularly clear on the uncertainty that was being --
9 that the impacts would have, and also that the virus
10 itself was having huge economic impacts, and the best
11 thing for the economy was clearly to control the virus
12 and to limit the virus. I think that was in --
13 you know, that will have been consistently through our
14 advice. I don't know about this particular paper.

15 **Q.** But in terms of the view within Treasury, was there ever
16 support for that circuit breaker, to the best of your
17 knowledge?

18 **A.** I don't -- I wouldn't know, I don't know. The Treasury
19 did not have a pre -- a position -- you know,
20 pre-proposed position on restrictions. What we were
21 trying to do was provide the economic analysis and
22 evidence that was going to feed into the process to make
23 the right decisions. Clearly where restrictions could
24 control the virus that could be beneficial to the
25 economy, because it was the virus itself that was

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1 **Q.** -- be synthesised within the Cabinet Office?

2 **A.** I mean, it was the case that the -- it was the case that
3 different departments have different expertise and have
4 different objectives in terms of the things they care
5 about. In the Treasury obviously we were incredibly
6 concerned about the economy and the economic impacts, as
7 is our role, and other departments have responsibility
8 for other aspects of public services, and it was for,
9 you know, decision-makers together to make those choices
10 and -- and, when they occurred, trade-offs, about how do
11 you manage this level of harm across the
12 decision-making.

13 That was how -- you know, that was what we -- you
14 know, it was the role of the Cabinet Office to bring
15 those things together and to be the place where all of
16 the information is synthesised and these different
17 issues, whether it's across, you know, the economy,
18 education, inequalities, all of those very important
19 factors -- we all recognise that all of these factors
20 were incredibly important and that decision-makers would
21 need information across all of them to make those really
22 hard judgements.

23 **Q.** Did it make it harder, though, with regard to the fact
24 that effectively the Cabinet Office was being presented
25 with these binary options? You had the economic -- you

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1 had the Treasury making the economic case, you had the
2 Health Secretary making the health case and no real
3 effort to engage across those disciplines between the
4 departments?

5 **A.** I mean, you would have to ask that -- I wouldn't
6 characterise it as binary. As I say, the economic
7 analysis and evidence very much recognised and factored
8 in the fact that the virus itself was what was causing
9 huge damage to the economy, and actually there's a range
10 of estimates now available about how much of this would
11 have been voluntary and how much restrict -- you know,
12 how much as a result of restrictions, and the
13 uncertainty around that. So the Treasury was sort of
14 well aware that the virus itself was causing huge damage
15 to the economy. In terms of the process question you
16 asked, I mean, that is, it is -- it is the role of the
17 Cabinet Office to bring together all of this information
18 and to synthesise it, and, you know, in this case, it
19 would have been particularly challenging to do that.

20 **Q.** Now, you may be aware there has been criticism of the
21 Treasury with regard to it being tactical in how it
22 shared its economic analysis, so essentially putting
23 forward that analysis where it was considered that it
24 would advance a Treasury objective. Just because we've
25 just seen it, for example, in relation to the

25

1 **Q.** Now, it's right that nobody else was providing that
2 economic analysis aside from the Treasury during that
3 period?

4 **A.** We were bringing together the economic analysis. We
5 were using and building on a lot of information and
6 analysis from other parts of the public sector that we
7 were talking to and had good relations with -- you know,
8 had relations -- they shared their information with us,
9 and so we brought it together and then it was -- it was
10 the Treasury that were responsible for inputting that.
11 In some cases we did that jointly with some economic
12 functions in the Cabinet Office as well.

13 **Q.** With regard to transparency similarly you'll be aware,
14 because of the materials that have been provided to you,
15 there have been criticisms in relation to the Treasury's
16 modelling analysis and advice not being published or
17 made accessible to, whether it be other government
18 departments, SAGE, for example, or more broadly
19 actually, and we can compare perhaps the position of
20 SAGE where those minutes of the meetings and the
21 modelling and the analysis was published.

22 Do you consider that transparency would be something
23 that would be desirable in relation to the economic
24 modelling and advice in hindsight?

25 **A.** I mean, transparency is always -- you know, is a good

27

1 circuit breaker paper that we've seen, the briefing for
2 the Chancellor there. What do you have to say about
3 that? Was information and economic analysis shared
4 freely or was it shared when it was in advance of
5 a policy proposal that Treasury sought to advance?

6 **A.** We shared our economic analysis and evidence very, very
7 freely with everyone that -- you know, with -- with --
8 to ensure it was feeding into the decisions as it needed
9 to. So we shared -- I mean, in two ways. So we
10 produced a huge amount of economic analysis that we
11 obviously shared with the Chancellor so he was fully
12 informed, and we also fed it directly into the
13 Cabinet Office process, and the Cabinet Office were
14 responsible for synthesising the data and analysis.

15 I mean, we did also share it around Whitehall with
16 other departments that were -- that had economic
17 interests. We had, for example, weekly notes that were
18 going round on those sorts of things. And of course we
19 shared it more broadly across the public sector with
20 other parts of the economic sort of framework. We were
21 in constant discussions with, for example, you know, the
22 Bank of England, the OBR and the like. But we fed all
23 the analysis and the information that we had into those
24 Cabinet Office processes so that they could serve the
25 joint decision-making process.

26

1 thing, it helps you -- it helps you, you know, get other
2 input and views on what you're doing and we -- you know,
3 we did share our modelling and our analysis,
4 particularly with, as I say, the other parts of the
5 economic framework we use in the UK. You know, we have
6 a very -- unlike SAGE, I would say, in the UK we have
7 a very established set-up for how we do economic
8 analysis and policy making. You know, SAGE
9 understandably and rightly is convened in emergencies to
10 add capability and capacity where it doesn't exist, so
11 in this case, you know, bringing epidemiology and
12 virology expertise to the Department of Health and the
13 wider government decision-making process. Slightly
14 different on economics I would say, in that we do have
15 a specialist capacity in the Treasury to analyse the
16 economy, we do have specialist capacity in the Bank of
17 England, in the Office for Budget Responsibility, and so
18 on and so forth, so there is some capacity and expertise
19 that is designed to do the monitoring of the economy and
20 provide analysis and evidence.

21 Could -- you know, could we have done more to make
22 it more systematic? Perhaps, but I -- I don't think
23 there quite -- you know, there are differences in the
24 way we have the system and we have got quite a robust
25 macroeconomic framework that we use.

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1 On transparency, I mean, we did publish, you know,
 2 some analysis, more than we normally do, as you'll have
 3 seen. I mean, obviously the -- at fiscal events we
 4 publish evidence. The government published quite a lot
 5 of analysis through the pandemic and that included
 6 economic analysis, and of course the Office for Budget
 7 Responsibility are responsible for publishing outlooks
 8 on the UK economy and they published more during this
 9 period, but it wasn't with the frequency with which,
 10 for example, SAGE papers and minutes were published.
 11 **Q.** It was a fraction in -- comparatively to what SAGE
 12 published but what is your view in relation to whether
 13 that material ought to be published? We'll turn to
 14 looking at other ways of assessing the economic impacts
 15 and filtering that through in a moment. But with regard
 16 to publishing and making -- being more transparent, is
 17 it desirable to have that advice published?
 18 **A.** I think it's difficult. I mean, as you've seen in some
 19 of the examples, it's quite difficult to separate out
 20 the economic and -- you know, much of the economic
 21 analysis was part of the policymaking process and was
 22 feeding into the policy decisions. I think it is very
 23 important that ministers and officials have a space
 24 where they can, you know, have free and frank
 25 discussions and share information about policy, and I do

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1 what we spent our sort of time and effort and energy on.
 2 We could -- you know, ministers could decide to publish
 3 more and share more and we could do that.
 4 **LADY HALLETT:** Is there any risk to sharing more?
 5 **A.** I think ... no, I mean, I -- leaving aside -- the point
 6 I was making earlier about I think it's quite hard to
 7 separate out in some of these issues, you know, what's
 8 policy advice and what's analysis, I guess the -- no,
 9 I mean, the practical risk, being frank, was we had
 10 limited time, it was an exceptionally busy period,
 11 you know, everyone was working -- was working round the
 12 clock. If you are also on top of that, you know,
 13 thinking about publication schedules and what do you
 14 publish and handling the responses to that, being frank
 15 you would -- we would have had less time to do the
 16 actual analysing of what was going on and less time to
 17 talk to ministers about it. So I think, you know, that
 18 is one of the concerns about that. But, you know, in
 19 terms of the sort of modelling where it's separable from
 20 policy, you certainly could.
 21 **MS CECIL:** Now, just dealing with sight across government
 22 and indeed other organisations or committees, just
 23 touching on SAGE for a moment, one repeated theme coming
 24 through from the SAGE minutes, as you will have seen, is
 25 that SAGE were not dealing with the economic impacts but

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1 think it's quite hard to -- you know, there's a reason
 2 that we've always had the space for policy making to be
 3 able to happen privately for ministers, for --
 4 **Q.** Let me just interrupt you there. Let's put policy
 5 making to one side and discuss modelling and data
 6 analysis.
 7 **A.** Yes.
 8 **Q.** In the same types of papers that you see coming out of
 9 SAGE in short, not necessarily the discussions on policy
 10 with the trade-offs either way and the advice to
 11 ministers but the models and the analysis that was
 12 undertaken by Treasury.
 13 **A.** Yeah, I mean, we did expose them to quite a lot of --
 14 you know, we shared them quite broadly and got input.
 15 As I say, if we -- you know, could we have done that
 16 more? I mean, potentially. And, you know, maybe that
 17 would improve the quality of the modelling and,
 18 you know, we have -- we're sort of not precious about
 19 that.
 20 I guess the question I would have is whether or not
 21 it would -- well, yeah, I mean, we could -- you could do
 22 that. Our primary focus at this time and, you know,
 23 being frank it was a pressurised time, was to ensure
 24 that, you know, ministers and decision-makers had the
 25 best information available. That -- you know, that was

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1 there was an understanding and it was recorded that
 2 Treasury were, and indeed you were asked about one of
 3 those meetings, and it's the 58th meeting of SAGE on
 4 21 September 2020, so again the same sort of time as the
 5 circuit breaker that we have been discussing.
 6 At paragraph 5 of that meeting -- of those meeting
 7 minutes it states that that work is being undertaken
 8 under the auspices of you, the chief economist.
 9 Now, in your witness statement, page 15,
 10 paragraph 56, if I can just pull that up, you explain,
 11 while we're waiting, in short form that you do not know
 12 what that work was being -- what work that was or what
 13 was being referred to there. Is that right?
 14 **A.** I mean, I knew -- I know what work we were doing in the
 15 Treasury on the economic analysis. What I didn't know
 16 is what -- I mean, what the author who drafted that
 17 minute intended by it, you know, I wasn't at the
 18 meeting, it wasn't checked with us, I think it was
 19 probably, you know, no doubt they were busy and under
 20 stress and perhaps it's a loosely drafted phrase.
 21 What we were doing in the Treasury, as I've
 22 described to you and is in those statements, is a huge
 23 amount of analysis on what the economic impacts of the
 24 virus were, and we were -- we were sharing that with
 25 ministers. I suspect this is possibly just a phrase

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1 that was drafted that perhaps wasn't as accurate as it
 2 could have been.

3 **Q.** Could it also be attributable, though, to the lack of
 4 communication as between, for example, SAGE and the
 5 Treasury on these points? As I say, that lack of
 6 synthesis between the two: you're reporting in to, as
 7 you say, ministers; but there is very limited
 8 interaction between the epidemiologists and other
 9 scientific committees, SPI-M, SAGE and the like, and
 10 then the Treasury?

11 **A.** I think -- I mean, I wouldn't interpret this line in the
 12 minutes as that. I mean, I'm not an expert on SAGE
 13 obviously, but I think it is right that SAGE focuses on
 14 science, that is its expertise and what it is set up to
 15 do, I think it is right that where you have the
 16 expertise on the economy the people with that expertise
 17 are advising on the economics and then I think it is
 18 necessary that you have somewhere that brings that all
 19 together and synthesises it and informs decision-makers
 20 as best they can. So, you know, we were -- we did
 21 have -- you know, there was a good relationship between
 22 the Treasury and SAGE, in fact we had an observer from
 23 the Treasury at SAGE to make sure that there were not
 24 misunderstandings and those sorts of things, but I do
 25 think it's right in a sense that, you know, the

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1 was it was incredibly uncertain, these situations, and
 2 so it was just incredibly hard to know, for example, as
 3 you -- you know, when the second lockdown happened,
 4 what -- how would people respond. Would they respond in
 5 a similar way to the first? And actually we saw big
 6 changes. But the issue on process, I think -- you know,
 7 the challenge was the challenge of the circumstance
 8 being incredibly difficult to deal with to understand to
 9 predict rather than we weren't necessarily talking to or
 10 harnessing the expertise that was available in
 11 behavioural science. We were using what was available
 12 and feeding that into our modelling.

13 **Q.** I'm sure that everybody will understand the inherent
 14 complexities in dealing with a situation that was
 15 evolving and that people had not been in before and all
 16 of those uncertainties, but notwithstanding that we do
 17 see in other areas, such as SAGE and SPI-M-O, that
 18 modelling is undertaken even with all of those
 19 variables, with those uncertainties. In fact it's
 20 a point of some of the consensus statements is to deal
 21 with those uncertainties. We see probability risks and
 22 so on.

23 Is that not something that Treasury could have done
 24 to try to assist it when it came to providing advice on
 25 NPIs and potential impacts, effectively so that you

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1 expertise focuses on what it's expert in, and then it's
 2 all brought together and synthesised in a place that is
 3 capable of doing that and has the capacity to do that.

4 **Q.** If I can just pick up on the expertise point for
 5 a moment. As you say, Treasury and economics,
 6 obviously. Also though, within SAGE, you have SPI-B,
 7 the behavioural scientists, you also have the
 8 epidemiologists who have expertise actually in
 9 pre-pandemic situations, in how behaviour does change in
 10 pandemic situations, those sorts of issues. And to
 11 bring you back to one of the primary issues that you saw
 12 at the Treasury, a challenge was that inability to
 13 accommodate that behavioural change, to understand how
 14 that behavioural change might play out when it comes to
 15 modelling.

16 Would it not have been of benefit to have had
 17 assistance from SPI-M-O and SPI-B or any of those other
 18 committees with respect to your modelling because
 19 behaviour was such an integral part of it?

20 **A.** I mean, to be clear, we had good relations and worked
 21 with behavioural scientists, both SPI-B and of course
 22 the behavioural insights unit and we had lots of
 23 conversations. I think the challenge was less was the
 24 information there -- I don't think the issue was the
 25 information was there and we weren't using it, the issue

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1 could design smarter NPIs, and not necessarily have to
 2 resort to those lockdowns?

3 **A.** We -- I mean, we did do a lot of modelling and we did,
 4 as far -- use the information as far as possible, so we
 5 were doing modelling and we were using it. For sure,
 6 I mean, on smarter NPIs, yes, and actually one of the
 7 things we did do, and you've seen it in the evidence, is
 8 build what's called epi-macro models that bring together
 9 the epidemiologists and the macroeconomics as far as
 10 they can, and we did use those models and try to -- and
 11 they have -- you know, the results and the insights that
 12 they bring are very similar to the ones that you're
 13 talking about in terms of smarter NPIs, and actually are
 14 there a range of restrictions that you could look at and
 15 how do you think about those in terms of their impacts
 16 on the virus and the impact on the economy.

17 **Q.** But for the Treasury the epi-macro modelling was not
 18 a particular success; is that right?

19 **A.** Well, I wouldn't say -- it was no less a success for the
 20 Treasury than it was for anyone else, if you like. We
 21 were using very similar techniques -- we talked to a lot
 22 of academic epi-macro modellers and actually if you look
 23 at other organisations, you know, they were doing the
 24 same.

25 I think epi-macro modelling, you know, was clearly

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1 evolving very quickly and that was very useful through
2 the pandemic and we learnt a lot about it. Where it was
3 challenging, and challenging for everyone, is in terms
4 of the insights it could provide into very specific
5 decisions about which restrictions and at what time.

6 So we used it and we used it in the same way others
7 did, and tried to bring what insights we could into our
8 analysis. I mean, I should say at this point one of the
9 things we did a lot was talk to people in other
10 countries about what they were doing and their approach
11 was -- on the modelling and the analysis and people
12 were -- you know, it was to make sure that, you know,
13 were we missing things, were there other things that we
14 should be thinking about. And others were taking a very
15 similar approach.

16 So I wouldn't say the epi-macro modelling wasn't
17 a huge success, it sort of -- you know, what is
18 a success depends on what you're asking it to do. It
19 gave us some insight. It wasn't a particularly useful
20 tool for, you know, making policy decisions about, about
21 restrictions.

22 **Q.** Indeed. What you say in your statement is that it had
23 limited practical application, they weren't a big part
24 of advice to ministers, essentially, as a consequence.

25 What were they replaced by?

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1 you know, maximising the information that we could bring
2 to any specific question or the questions overall.

3 **LADY HALLETT:** The stenographer is struggling, both of you.

4 **MS CECIL:** That's my fault. Let's both try to slow down.

5 **A.** Sorry.

6 **Q.** Not at all.

7 I'm going to move now to a different type of model,
8 if I may, very briefly, and that's the toy model. So
9 a toy model was developed in the later stages of 2020
10 going into 2021, and indeed provided to the Treasury
11 amongst other departments.

12 Now, just if we can just deal with what a toy model
13 is very briefly, it's a very basic model, you can play
14 around with the assumptions, and as a consequence run
15 different scenarios. Is that a very high-level overview
16 of a toy model?

17 **A.** Yes, it's a simplified model.

18 **Q.** Exactly.

19 Now, there were concerns about the use of the
20 Treasury's engagement with that toy model.

21 If I can just call up INQ000196031, this is an email
22 chain that involves Angela McLean, so the Chief
23 Scientific Adviser to the Ministry of Defence but also
24 the Deputy GCSA at the time, Philip Duffy and
25 Ben Warner, who we'll be hearing from later.

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1 **A.** What do you mean, sorry?

2 **Q.** As I understand it, you ceased using those epi-macro
3 models and what filled that gap? You said they had some
4 utility.

5 **A.** Yeah. I can't recall actually if we sort of ceased
6 using them. I wouldn't look at that -- what we had was
7 we had a suite of models that we used and we used those
8 models throughout the pandemic for different -- in
9 different ways for different things, as was sort of
10 useful, and we also had the sort of data and analysis
11 that we were using, and we brought those together and we
12 used them through. So it wasn't -- it would be wrong to
13 sort of think, well, we developed an epi-macro model, we
14 tried it, it didn't work, we threw it away. That wasn't
15 the sort of approach that we took. We -- like I say, we
16 were all the time evolving what was useful in the
17 modelling capability.

18 And depending on what the specific question is that
19 you're trying to answer, in some areas a model might be
20 useful, in other areas it might not be, in some areas,
21 actually, you know, better to look at the evidence
22 analysis on the ground. And we doing a combination of
23 things throughout and adapting -- basically, I mean, as
24 you said, huge uncertainty. We were bringing together
25 what was available and what we could usefully use and,

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1 If we can go over the page, please, to page 2, and
2 what we see here is the email from Dame Angela McLean,
3 and it explains that she has concerns with how HMT has
4 been utilising the toy model. She explains that HMT
5 have changed the model after she had quality assured it.
6 She doesn't know how that happened. Obviously this is
7 all dealing with epidemiological modelling, so something
8 that's not strictly, as you would say, within the
9 expertise of Treasury, in the initial instance.

10 She makes it explain that any modelling that comes
11 out of Treasury as a consequence has no endorsement from
12 her, that they're on their own. And she continues to
13 say that there is an "inability previously to spot
14 egregious errors" in other things that they have been
15 sent:

16 "... I do not have any confidence in their ability
17 to hack a simple, sensible model."

18 Were you involved at any point within the toy model?

19 **A.** I wasn't, I'm afraid.

20 **Q.** Do you have any understanding or were you aware of the
21 issues that were being discussed in relation to the
22 Treasury's use of the toy model?

23 **A.** Not really. I understand that the toy model was a -- as
24 referred to -- sort of simplified epidemiological model
25 that I think the Joint Biosecurity Centre in the

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1 Cabinet Office constructed, with input from other
2 departments, in particular from SPI-M, and so I was
3 aware it was happening. I think Treasury modellers,
4 you know, were involved in -- and as you can see here,
5 it wasn't economic in nature, so I don't, I'm afraid,
6 have any first-hand knowledge of it.

7 On the email exchange, I also -- you know, I saw
8 this email and I did speak to Ben Warner I think after
9 it, but that was much more broadly, just to talk about
10 actually the importance of making sure that this
11 modelling work fed into the Covid Taskforce at the time,
12 who were the people responsible for bringing it all
13 together. But I'm afraid on the details of what's being
14 referred to here, I simply don't know.

15 **Q.** Thank you.

16 If I can turn to some of the various policies,
17 I appreciate that you were not in charge of policy, but
18 you have some understanding owing to your previous role
19 and, indeed, your role as the chief economist generally.

20 If I may touch upon the summer of 2020, again you
21 will be aware that there were criticisms that the
22 Treasury was suffering from optimism bias at that point.
23 Is that something you saw within your role at the
24 Treasury at that time? Was there a belief that you were
25 coming through the pandemic, moving through, getting

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1 restrictions with, you know, very large impact on
2 activity in the economy and on unemployment and there
3 was a concern, and the economic analysis sort of showed
4 this, that there was a risk that if you -- if you have
5 long periods of, for example, inactivity, it can have
6 very bad impacts on your employment in future, on your
7 life chances, and we were very conscious of the fact
8 that -- the desire was to make the economic costs, if
9 you like, of Covid as short lived as possible and to
10 bring back activity once the economy was re-opened,
11 because of the path of the virus.

12 So the concern was around the risks to the economy
13 from lower levels of, for example, consumption, because
14 the UK is a very consumption-heavy economy compared to
15 others, but lower levels of economic activity and the
16 impact that would have had on employment, and, as I say,
17 the understanding that periods of employment, you know,
18 in a sense -- periods of inactivity, the longer they go
19 on the bigger impacts they can have, and in particular
20 we know that the distributional impacts are much greater
21 for people who are at lower ends of the income
22 distribution or people who are on lower skills.

23 So we were focused on and thinking about the impact
24 of -- on the level of economic activity and jobs, and so
25 the Treasury produced -- developed and produced what

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1 ahead of the virus?

2 **A.** I don't ... I don't think the Treasury had optimism
3 bias, I would say -- you know, maybe I would say that,
4 indeed, if anything, the Treasury's normally accused of
5 the opposite. But in this particular -- I mean, what
6 was going on at the time I think was the government --
7 you know, we were -- restrictions were being lifted
8 because the outlook looked a bit better, so I think
9 across the piece, you know, as restrictions were being
10 lifted, you know -- and perhaps people did want to
11 sort of look forward and feel this was behind them, but
12 I don't think the Treasury had a -- took a -- it
13 certainly didn't take at any point a different view on
14 the epidemiology that than the epidemiologists would
15 have done. I mean, we were getting our information
16 about the virus and its progress and its outlook from
17 the experts on SAGE and through that process. So
18 I don't think we had a specific -- we certainly didn't
19 have a different view of the epidemiology.

20 **Q.** This was at the time when the Eat Out to Help Out policy
21 was introduced, so July/August of 2020. Who and at what
22 level was that policy being driven forwards by?

23 **A.** So overall I would say the -- I mean, the concern at
24 that time on the economic side was around, as
25 the economy was coming -- we'd had this period of

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1 I think was called the Plan for Jobs, which was a range
2 of policy interventions, all of which were about trying
3 to support the economy through this quite difficult
4 period as it re-opened knowing that, you know,
5 businesses would have been under distress, that people's
6 jobs were at risk and the like. So that was the plan.

7 The -- Eat Out to Help Out was one part of that, of
8 that package. But that was -- so it was -- there was,
9 you know, a desire in the government actually to sort of
10 move forward on -- you know, to provide support to the
11 economy as it came out of this period of having quite
12 high levels of restrictions.

13 **Q.** So was this being driven by ministers or within Treasury
14 itself in terms of officials?

15 **A.** Well, I mean, policy decisions are ultimately always for
16 ministers. The economic analysis we were producing was
17 very clear that there were severe economic risks to this
18 period and that the economy was suffering quite greatly
19 in the period, and ministers obviously wanted to know in
20 what ways they could support the economy through what
21 was a really challenging period for, like I say,
22 employers, businesses and the like.

23 **Q.** Now, the position is that neither Sir Patrick Vallance,
24 the CSA, or Sir Chris Whitty, the CMO or indeed their
25 deputies were consulted in relation to Eat Out to Help

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1 Out. Do you know if any scientist was consulted in
2 relation to Eat Out to Help Out?
3 **A.** I don't, I'm afraid. I wasn't in -- heavily -- you
4 know, the process by which the Eat Out to Help Out
5 policy was put together I understand utilised the
6 sort of architecture we use for budget processes, but,
7 you know, I was involved in the sort of economic
8 evidence that fed into these -- this sort of
9 identification of the challenge and our particular
10 concerns about, for example, hospitality. I don't know
11 the details of the clearance process.
12 **Q.** Now, you are somebody that was also speaking almost
13 daily, on occasion, to the CMO and the CSA. Did you not
14 ever raise it with them?
15 **A.** Yeah, I ... I think daily, I understand where that comes
16 from, from the Institute for Government report. I'm not
17 sure -- I mean, early on in the pandemic we spoke very,
18 very regularly, particularly in those early weeks in
19 March and April when it was -- the uncertainties were
20 higher. We were -- I mean, I did speak to Patrick and
21 Chris regularly when it was useful to do so. I don't
22 know if I did during this period.
23 But the decisions about how policy is developed and,
24 you know, who is involved in it and all of that were not
25 decisions that, you know, I would be -- you know, they

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1 **A.** I would -- look, I would agree that, yeah, the
2 objectives were to, as I say, support economic recovery
3 and also to limit what was often called the scarring
4 effect of, you know, what would be the long-term impact
5 of these -- of the virus and of the measures taken to
6 control it, yeah.
7 **Q.** Now, towards the end of the scheme, there was feedback
8 that it was causing problems. Were you aware of that
9 feedback?
10 **A.** I wasn't, no. I wasn't responsible for the policy side
11 of the scheme.
12 **Q.** Just two other areas briefly in relation to the
13 involvement of the Treasury, and financial support. The
14 first relates to self-isolation payments for those in
15 low-paid employment or unstable employment, the gig
16 economy, zero-hours contracts, and we've heard evidence
17 from Professor Yardley, indeed from Lee Cain, that it
18 was important that financial assistance was provided to
19 individuals to allow them, to enable them to be able to
20 self-isolate. But we have heard that throughout
21 Treasury pushed back and refused to extend that finance,
22 aside from some final payments that were made in
23 September of 2020, but that it continued to be a problem
24 regardless.

Were you involved in any modelling or any analysis

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1 were not decisions for me. And, like I say, we used the
2 architecture we use for when we develop any other fiscal
3 event for the Plan for Jobs overall, so I don't know who
4 was sort of involved in each component.
5 **Q.** You dealt with the economic aspects. Do you know if the
6 risk of potentially increasing infections was considered
7 at all?
8 **A.** I don't know. I mean, the -- I don't know the policy
9 was conceived in the context that, you know, it was safe
10 to lift restrictions and activity could return.
11 **Q.** Now, with regard to that policy, if I can just call up
12 INQ000235019, very briefly.
13 We see that there were two predominant aims to it.
14 We see that at the very top here. The first was:
15 "To support the economic recovery by stimulating
16 consumption in the hospitality sector ..."
17 And the second is really looking at behavioural
18 change:
19 "To incentivise consumers to return to the
20 hospitality industry and consume sit-down meals out by
21 reassuring people it was once again safe to consume and
22 altering social behaviours that have become entrenched."
23 Essentially to encourage levels of contact that had
24 previously been restricted considerably.
25 Would you agree with that?

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1 in relation to how much that would cost and any
2 cost-benefit analysis?
3 **A.** No, no, I wasn't. I mean, those -- I was aware that --
4 of the sort of policy issue in discussion. The relevant
5 policy team which would have been in, you know, the
6 public services part of the Treasury, or the welfare
7 part of the Treasury, would have been the -- would have
8 been handling that issue and would have undertaken
9 whatever analysis was necessary. It wouldn't, if you
10 like, have been macroeconomic in nature.
11 **Q.** Do you know if it was it a decision taken out of
12 principle or whether those impacts and analysis was
13 actually undertaken?
14 **A.** I don't know, I would expect that analysis -- you know,
15 that there would have -- the decision would have been
16 taken on the basis of an understanding of the issue and
17 analysis, but I'm afraid I can't add any detail.
18 **Q.** You may not be able to help me with this next one, then,
19 because it really falls into the same type of category,
20 but if I can just ask the question. Payments for care
21 workers, significant issue being potential transmission
22 as a consequence of care workers working in more than
23 one care home or establishment, as a consequence of the
24 fragility of the sector in short, again HMT were
25 approached with proposals to allow for those individuals

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1 to be compensated for not being able to move between
 2 different care homes, but HMT refused to expand or
 3 extend any financial provision in that respect. Do you
 4 know anything about that decision?

5 **A.** I'm afraid not. Again, the relevant policy team would
 6 have been working with, you know, the Department of
 7 Health and Social Care and would have been considering
 8 that.

9 **Q.** Thank you.

10 Just turning, then, if I may, to that whole period,
 11 from the Eat Out to Help Out, the summer, and then into
 12 the autumn when some of these policy decisions were
 13 being discussed. Were you aware that the Chancellor was
 14 being referred to as Dr Death in some quarters across
 15 government?

16 **A.** I wasn't, no.

17 **Q.** Were you aware that he had been perceived to have
 18 an anti-lockdown, anti-restriction approach, feeding any
 19 of those sorts of comments?

20 **A.** I wasn't. We were, you know, providing advice and
 21 information to him. You know, he will have been aware
 22 of the economic consequences of these decisions.

23 **Q.** Finally, if I can just turn to one last topic, and
 24 that's in relation to the potential integration of, and
 25 we've discussed it to some extent, science alongside

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1 economics SAGE, (2) is a single model, effectively
 2 presumably drawing together the science, the
 3 epidemiology, the health and the economics all into one
 4 model; or (3) something more informal.

5 The very first thing you say is that:
 6 "The economists [obviously] killed the single
 7 model ..."

8 Why was that obvious?

9 **A.** I mean, it was obvious because if you imagine attempting
 10 to construct a single model that could solve, if you
 11 like, bring together all of the issues that the
 12 government had to decide over, so, you know, considering
 13 health, the -- both the sort of epidemiology and the
 14 virus, but also actually the wider health impacts, if
 15 you then think about adding in economics, adding in
 16 social distributional issues, you know, if you were to
 17 sort of put -- imagine this model also had to have
 18 a distributional feature where you were looking across,
 19 you know, gender, ethnicity, income groups, if you were
 20 then to add in educational impacts, if you were then to
 21 add in impacts on other public services -- I think you
 22 could quite quickly see that there's no single model
 23 that could, in a sense, solve -- I mean, it would be
 24 wonderful if you could just have a model and solve for
 25 what the government's policy response should be, but

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1 economics, health, social impact, material.

2 If I can just pull up an email, please. It's
 3 an email from you. It follows on from a 5 June 2020
 4 seminar on those issues.

5 It's INQ000235261.

6 What we see here, as I say, it's an email from you.
 7 It's to some extent a read-out of what's taken place at
 8 that earlier meeting. It's a meeting with Ben Warner,
 9 chairing it, at Number 10. You explain that you're not
 10 sure if anything will come of it. We continue onwards:
 11 "The discussion would have felt very familiar -- the
 12 economists all did a very clear pitch on smarter NPIs
 13 being able to deliver the same level of virus control at
 14 lower econ cost."

15 You refer to a paper. But the part that I'm
 16 interested in is the next section, which states:
 17 "There was a general conclusion (by economists) that
 18 the economics is not being considered enough."
 19 And indeed you will be aware that the Chancellor at
 20 the time, and subsequently, has expressed that opinion.
 21 "And a desire for a place to bring this together."
 22 So this is quite early on in the pandemic, we're
 23 talking about 5 June 2020.

24 Three options were proposed at that time, so it's an
 25 effort to synthesise some of this material: (1) is an

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1 I think if you think about the reality of that, one
 2 single model could never do that. What you can do with
 3 modelling is look at different parts and aspects of it.
 4 So I -- that will be, you know, why.

5 **Q.** In relation to the economic SAGE, that found slightly
 6 greater favour, and then it's spoken about in terms that
 7 "Ben Warner would follow up":
 8 "Ideally [you] would doc [that] ... into existing
 9 structures and processes and use it to get a greater
 10 weight on the [economic] arguments in No10 thinking."
 11 There was no real follow-up, was there, in relation
 12 to this? Nothing came of this discussion in terms of
 13 pulling together an economic SAGE or anything of that
 14 nature; is that fair to say?

15 **A.** Yeah, nothing came from this specific discussion. I do
 16 remember also having quite -- some discussions with, for
 17 example, Patrick Vallance about the way we could do this
 18 on the back of some conversations he'd had, and we did
 19 set up a sort of partnership with the Royal Economic
 20 Society and use that to get a wide range, actually, of
 21 economic input, which was incredibly useful, into the
 22 process. Again, not quite like SAGE in terms of,
 23 you know, it wasn't meeting weekly, with commission
 24 papers and the like, but you're right, in response to
 25 this particular email I think at the time we didn't --

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1 we didn't follow up by effectively establishing an
 2 economic SAGE or similar.

3 **Q.** Indeed. You will have also seen and it's been suggested
 4 that the Treasury itself shut down that idea of
 5 an economic SAGE model, that senior officials within the
 6 Treasury vetoed proposals from other departments to
 7 establish a cross-department group to discuss
 8 the economic impacts; is that right?

9 **A.** Yeah, I don't really -- I'm not aware of there being
 10 a specific proposal that was, in a sense, shut down.
 11 What we were very keen to do is make sure that the
 12 economic analysis and evidence and arguments were
 13 feeding into the Cabinet Office process and that they
 14 were considered as part of that, and -- you know, so we
 15 were really -- we thought the right answer to this was
 16 that you needed a central government place that was
 17 bringing together all of these incredibly, you know,
 18 different arguments and putting them -- you know,
 19 bringing them together. And we thought that was,
 20 you know, incredibly important and of course, you know,
 21 how that was done evolved through the pandemic, but it
 22 was absolutely essential that there was a place that
 23 could bring all of this together.

24 **Q.** Is it your view, therefore, that that place ought to be
 25 the Cabinet Office as opposed to either an economic SAGE

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1 National Economic Council. So, you know, those sorts of
 2 issues. But I think -- that is the role of the Cabinet
 3 Office, you know, I think that's -- and that makes
 4 sense. And economic SAGE, I think if you -- you could
 5 do, you could certainly have one and set it up. I would
 6 think its scope should be limited to economics.

7 **MS CECIL:** Thank you.

8 My Lady, those are all the questions I have. There
 9 is one question, as I understand it, from the Long Covid
 10 groups.

11 **LADY HALLETT:** Mr Metzger.

12 **Questions from MR METZER KC**

13 **MR METZER:** Thank you, my Lady.

14 Just one topic, please, Ms Lombardelli, on behalf of
 15 the Long Covid groups.

16 You said this morning that briefings were shared
 17 with the Chancellor to ensure that he was fully
 18 informed. Was the Chancellor formally briefed on the
 19 economic impact of large numbers of people suffering
 20 from disabling long-term impacts of Long Covid?

21 **A.** Once we became -- well, once, if you like, the Long
 22 Covid -- you know, the health community had become aware
 23 of Long Covid, that would obviously -- that information
 24 would have been shared with the Treasury, and we would
 25 have reflected it in our evidence and analysis alongside

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1 or a body that sits above the various different
 2 committees to synthesise that advice?

3 **A.** I don't think it would be for an economic SAGE to bring
 4 together all the different arguments, in the same way
 5 that I don't think SAGE as it is should consider -- you
 6 know, that should be focused on science. If you were to
 7 set up an economic SAGE I would think you would very
 8 much want it to focus on economics, and that's where you
 9 could ask it -- you know, could consider some of these
 10 issues around modelling.

11 I wouldn't suggest you had a committee of economists
 12 deciding or -- or solely being the people thinking about
 13 the other issues, education, for example, health --
 14 again, I don't think it's for economists. So I do think
 15 it's very much a case that you need the experts to focus
 16 on their expert areas and that then to be fed into --
 17 and for them to talk to each other and learn from each
 18 other but, you know, you have a place where it all comes
 19 together. That could be the Cabinet Office. I mean,
 20 that is what the Cabinet Office is for, and I think that
 21 is right. Whether within the Cabinet Office you would
 22 want to, you know, change it, have different
 23 structures -- we've done it before, you know, there's
 24 things like the National Security Council, and actually
 25 in the financial crisis we had I think it was called the

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1 the other long-term impacts that we would -- that we
 2 were very concerned about across the board. But,
 3 you know, he would have -- he would have been aware.

4 We wouldn't have done -- I mean, it's a health issue
 5 in and of itself. We wouldn't have estimated, if you
 6 like, a specific economic cost for it but we would
 7 have -- we were thinking about and we were doing what we
 8 could do bring evidence and analysis on the long-term
 9 impacts across the board, including, of course, health
 10 impacts like Long Covid.

11 **Q.** Are you able to assist as to when that was?

12 **A.** I can't recall, I'm afraid, and, as I say, I don't think
 13 there would have been a specific point when he would
 14 have received a specific piece of evidence that was --
 15 a specific piece is analysis that was -- you know,
 16 "Long Covid, the impact is X". What we would have done
 17 is taken the evidence and analysis about all the
 18 long-term effects, and that would have included
 19 Long Covid.

20 **Q.** Do you agree that the disabling impact of Long Covid
 21 would have had an economic effect?

22 **A.** The impact -- well, all the long-term effects, if you
 23 like, would have had a range of impacts, health -- but
 24 also on the economy in some cases. I mean, there will
 25 be an economic effect, obviously, for people who are

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1 suffering from Long Covid in terms of their labour
 2 market activity, and the like.
 3 **MR METZER:** Thank you very much indeed, Ms Lombardelli.
 4 Thank you, my Lady.
 5 **LADY HALLETT:** Thank you, Mr Metzger.
 6 Thank you very much indeed, Ms Lombardelli. Sorry.
 7 Just trying to pronounce your name made me cough,
 8 I'm sorry about that. Thank you very much for all your
 9 help.
 10 **THE WITNESS:** Thank you.
 11 **(The witness withdrew)**
 12 **LADY HALLETT:** Right, I think we'll break now, partly so
 13 I can cough quietly. Well, not quietly. I shall return
 14 at midday.
 15 **(11.42 am)**
 16 **(A short break)**
 17 **(12.00 pm)**
 18 **LADY HALLETT:** Mr Keating.
 19 **MR KEATING:** My Lady, may I call Stuart Glassborow, please.
 20 **MR STUART GLASSBOROW (affirmed)**
 21 **Questions from COUNSEL TO THE INQUIRY**
 22 **MR KEATING:** Do sit down, thank you.
 23 Could you give the Inquiry your full name, please.
 24 **A.** Stuart Richard Glassborow.
 25 **Q.** Mr Glassborow, thank you so much for attending today,

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1 **Q.** Bit of a mouthful, but you were number two to
 2 Martin Reynolds?
 3 **A.** To Martin, yes.
 4 **Q.** Yes. And today we want to explore with you really to
 5 understand the system in which economic information and
 6 analysis and advice was provided and fed through you or
 7 other means to the Prime Minister and core
 8 decision-makers, its evolution during that period, and
 9 whether there was any issues with its provision and
 10 incorporation, and lastly, and importantly, whether
 11 there was any lessons that we, the Inquiry, can learn in
 12 relation to that.
 13 So first area, an overview of your role. You have
 14 been a civil servant for over 20 years and still are,
 15 isn't that correct?
 16 **A.** That's correct.
 17 **Q.** Initially working DWP and then, thereafter, in the
 18 Treasury, and for three years, 2019 to May 2022, you
 19 were on secondment to Number 10 as the deputy principal
 20 private secretary, as we just heard?
 21 **A.** Correct.
 22 **Q.** Then you returned back to the Treasury and you continue
 23 to be there to this day?
 24 **A.** Yes.
 25 **Q.** In relation to how a private office works and the role

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1 thank you for assisting the Inquiry with its
 2 investigations.
 3 A few things just by way of preamble. First of all,
 4 both of us need to keep our voices up. Secondly, pace,
 5 if we could monitor our pace because there is a record
 6 being kept of what you and I say, and from time to time
 7 I may ask you to pause just to control the flow of
 8 information, if that's okay. And lastly, if any of my
 9 questions are unclear, do please ask me to rephrase
 10 them, because I'm sure the fault would be with me.
 11 Your statement, you provided a statement to
 12 the Inquiry dated 11 October of this year. It runs to
 13 35 pages, with 50 exhibits. We can see it in front of
 14 us, and you have signed it at the back, confirming that
 15 it's true to the best of your knowledge and belief; is
 16 that correct?
 17 **A.** Yes.
 18 **Q.** You have had the chance to refresh your memory in
 19 relation to the statement and other documents as well
 20 before coming in today?
 21 **A.** Yes.
 22 **Q.** Your evidence covers the time that you were the deputy
 23 principal private secretary to the Prime Minister in
 24 number two's private office, isn't that correct?
 25 **A.** That's correct, yes.

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1 of a principal -- or a deputy principal private
 2 secretary, we have heard evidence about that, so I'm
 3 going to take it very briefly, but is it fair to say
 4 it's a key liaison role?
 5 **A.** It does play a liaison role. The private office -- you
 6 did hear about this last week -- is --
 7 **Q.** Yes.
 8 **A.** -- that small team, you know, providing direct
 9 administrative support for the PM as he discharges his
 10 role. You know, arranging meetings --
 11 **Q.** Yes?
 12 **A.** -- relaying commissions or read-outs or decisions from
 13 the Prime Minister, obviously to the much, you know,
 14 bigger unit that is the Cabinet Office and all the other
 15 departments in government as well. So it's a sort of
 16 small administrative team working around the
 17 Prime Minister.
 18 **Q.** The team is a conduit, and in relation to what you've
 19 mentioned in your statement, it facilitates joined-up
 20 decision-making, you say this, it facilitates:
 21 "... coordinated, joined-up decision-making ... and
 22 to synthesise, track and drive progress on the Prime
 23 Minister's priorities across central government."
 24 Is that a fair summary?
 25 **A.** I think yes, it is, obviously working closely with the

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1 political team and colleagues in the Cabinet Office as
2 well, but yes.
3 **Q.** That phrase "synthesised", it's been used already this
4 morning and it touches upon your statement, and we will
5 return to it, about how information is funnelled through
6 into Number 10 and how that is then presented,
7 synthesised, to the Prime Minister.

8 As your role as deputy PPS to Sir Martin, you
9 oversaw domestic policies, and Imran Shafi, who we have
10 heard evidence from, he was one of the private
11 secretaries who worked alongside -- underneath you, you
12 were his manager, isn't that correct?

13 **A.** Correct.

14 **Q.** Multiple meetings. The pandemic consumed your working
15 life over the period of time you were in Number 10,
16 I think that's fair to say and to recognise, and you
17 were involved in multiple meetings and multiple types of
18 meetings.

19 What I wish to draw out are the meetings on
20 an economic front that you were involved in, key
21 meetings. From your statement, we can draw out this:
22 that there was 11 different types of meetings but the
23 core ones, is it not, were the PM's morning meetings,
24 the 9.15s, and you were involved with HMT, Her Majesty's
25 Treasury, and economy meetings such as the bilateral

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1 not: everyone was broadly carrying on business as usual,
2 we were unaware of the likely scale and impact of the
3 pandemic and therefore treated it as one of the many
4 issues crossing the PM's desk up until late
5 February 2020.

6 Is that a fair representation of the evidence in
7 your statement?

8 **A.** Yes.

9 **Q.** You add this, and perhaps we could bring this up, it's
10 page 17, paragraph 62(a), please. Last three lines:

11 "To the best of my knowledge, we in
12 Private Office -- and the No 10 machine more
13 generally -- were not advised of the likely scale of the
14 pandemic and its impacts."

15 This is at late February.

16 Just reflecting upon that, and there is a caveat
17 there, "to the best of [your] knowledge", but is that
18 an accurate statement, that the Number 10 machine was
19 not advised of the likely scale of the pandemic and its
20 impacts?

21 **A.** I think the point that I'm looking to make here is that
22 in this initial period -- you mentioned sort of January
23 and February -- as you said, Covid was one of the issues
24 the Prime Minister was engaging with --

25 **Q.** Yes.

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1 meetings with the Chancellor, and in relation to those
2 you mentioned that they were on a weekly/fortnightly
3 cycle; is that correct?

4 **A.** Yeah -- the PM's bilateral meeting --

5 **Q.** Yes.

6 **A.** -- with the Chancellor? Yes.

7 **Q.** Thank you. So bilateral means Chancellor and
8 Prime Minister?

9 **A.** And the supporting teams --

10 **Q.** Of course.

11 Data dashboard meetings, which we have heard about
12 generally, the economy dashboard meetings, which we're
13 going to touch upon in a few moments, and in addition
14 there was regular meetings between you and senior HMT
15 officials, you were the link person between HMT and
16 Number 10.

17 Before turning to that economic funnelling of
18 information and the synthesising of information, I want
19 to touch upon the initial response of the UK Government.
20 We've heard a lot of evidence about that already, so
21 it's going to be quite short, but you were a person who
22 was there in person actually during this time, and
23 you've touched upon it in your statement. In relation
24 to the initial response of Number 10 in January up until
25 late February, your evidence distills to this, does it

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1 **A.** -- alongside lots of others, you know, including the
2 sort of development of the budget that the Chancellor
3 was to deliver and -- I think on 11 March, and
4 High Speed 2 and 5G and I think some of the things that
5 other witnesses mentioned last week, and at that time --
6 in this time, while I think there is -- you know,
7 there's all the information and analysis that's being
8 discussed in the COBR forums and coming in from SAGE at
9 this time and -- what I don't recall hearing was sort of
10 lots of representations that the sort of Prime
11 Minister's diary should be completely cleared of
12 everything else and that he should be solely focused on
13 Covid in this phase, as opposed to it being, as you
14 said, one of those issues amongst many.

15 Now, that might sound a bit odd in hindsight now,
16 but I think that was the felt experience at the time.

17 **Q.** Just pausing there, in relation to focus, the focus was
18 elsewhere; is that a fair summary?

19 **A.** Well, I think there was significant focus on Covid, it
20 was an issue and there was data coming in and the
21 Prime Minister was briefed on it in a way I think you've
22 heard about from -- last week from other witnesses, but
23 there were lots of other issues as well. I mean,
24 you know, genuinely substantive issues on their own
25 terms.

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- 1 **Q.** Was it a case from an economic point of view, and that
2 was your liaison with the Prime Minister, was that he at
3 that stage, up until mid-February, was more concerned
4 about the economic effect of an overreaction to Covid?
5 **A.** Erm ... I don't know if I would characterise it, his
6 view, like that. Or -- I mean, I don't have
7 a completely clear view of what might have been in his
8 mind then, but I think the idea that one would not want
9 to overreact was something that was -- I mean, I think
10 if he -- I do recall that phrase, and I think he's
11 reflecting some of the advice he received. For example,
12 I think the CCS advice on 28 February, which I think,
13 again, you've looked at a bit --
14 **Q.** Yes.
15 **A.** -- refers to sort of the need to balance the need -- the
16 desire to take precautionary measures that -- while not
17 overreacting. So in that -- I mean, I think he --
18 I recall him in a sense echoing the advice he received.
19 **Q.** Was it little bit more than that, bearing in mind that
20 before events unfolded in Lombardy we -- he was
21 referring to, "Well, is this like swine flu? It's not
22 that serious. There is a danger of overreacting"?
23 **A.** I mean, I don't recall him saying that.
24 **Q.** No? Not in your daily interactions with him, that's not
25 something which came up?

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- 1 a pretty serious discussion.
2 **Q.** Helen MacNamara funnelling in her knowledge, enquiries
3 into Civil Contingencies Secretariat, Department of
4 Health plans --
5 **A.** From the Cabinet Office, yes, exactly.
6 **Q.** Yes. Ben Warner feeding in his review and assessment of
7 the SAGE meeting and the modelling?
8 **A.** Yeah, so you've got both those issues --
9 **Q.** Yes.
10 **A.** -- sort of coming -- as it happens, coming together in
11 one discussion that evening.
12 **Q.** And was this a case of civil servants and political
13 advisers really taking over a view of what the strategic
14 direction should have been?
15 **A.** Well, the nature of that discussion was to talk through
16 the two issues that we've just mentioned, in particular
17 the sort of latest data from SAGE and what that might
18 imply for I think what's now been described as plan A --
19 **Q.** Yes.
20 **A.** -- for managing the virus, with, you know, I think
21 an awareness amongst the group of people that there may
22 be a case for pivoting to a different plan in order to
23 protect the NHS, something, you know, more -- closer to
24 suppression rather than mitigation, to achieve that, and
25 also that the challenge may be more immediate than had

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- 1 **A.** No.
2 **Q.** You describe in your evidence that the second phase in
3 the response at Number 10 is when the scale of the
4 problem in northern Italy became clear and intensity of
5 work stepped up in late February; is that correct?
6 **A.** Yes.
7 **Q.** And then we fast forward to a change in strategy on
8 13 March, where you were present at a significant
9 meeting with Mr Cummings, Mr Warner, Mr Shafi and
10 Ms MacNamara, on the evening of 13 March, and you recall
11 that, don't you?
12 **A.** Yes.
13 **Q.** This followed on, as you say, from the SAGE meeting that
14 day. How would you describe the mood in the room
15 amongst this collection of civil servants and advisers?
16 **A.** Well, I think it was a very serious discussion, because
17 as -- this was sort of a moment where I think Ben Warner
18 was reporting back from the SAGE discussion, and the --
19 and the -- you know, the latest data from that and what
20 that might mean. And in parallel Helen MacNamara, as
21 you heard from last week, I think, sort of relayed,
22 you know, her new latest understanding of the sort of
23 readiness of, you know, the government wider plans for
24 dealing with the pandemic, and you got both of those
25 things being part of that same discussion, which made it

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- 1 perhaps been appreciated by some people.
2 But while this is -- you know, it felt like at the
3 time and talking to you now it feels like a very
4 significant discussion, it is also just some of the
5 Prime Minister's team and someone from the
6 Cabinet Office in effect preparing a meeting or meetings
7 for that weekend, and that was what happened, is the
8 output from those discussions was for us -- for us to --
9 well, convene meetings to prepare to brief the
10 Prime Minister and for him to engage or hear from the
11 scientists directly, meet some of his ministerial
12 colleagues, and those were the meetings that took place
13 on the Saturday and Sunday. So the scale of the issues
14 are significant, but the -- in a sense, it doesn't feel
15 like an unusual process to me.
16 **Q.** I don't want to cut you short, but they're long answers,
17 and we'll perhaps try to condense them a little bit more
18 to assist our stenographer.
19 You used the phrase "pivoting" in relation to the
20 plan, perhaps an understatement. The strategy was
21 jettisoned, was it not, when you went for the meeting
22 with Prime Minister on 14 March, which you touch upon in
23 your statement, but the view was that there was a real
24 need for an immediate lockdown, isn't that correct?
25 **A.** Erm, I'm not sure -- I'm not sure -- my recollection is

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1 not that there was the realisation or the view that we
 2 need an immediate lockdown. As I say, I think the two
 3 key points on the data or what might be implied by the
 4 data in those discussions on the Saturday, or the
 5 Prime Minister's meetings, related to the need to take
 6 more significant measures --

7 **Q.** Yes.

8 **A.** -- than had been hitherto imagined, and possibly to --
 9 well, and to move quicker than had been envisaged. And
 10 I think --

11 **Q.** Pause there. There's a follow-up question that will
 12 hopefully assist you. Two questions which flow from
 13 this and then I'm going to move on to our main topic.
 14 Was there an agreement or acknowledgement at that
 15 meeting on 14 March that there would be a need for
 16 a lockdown?

17 **A.** Well, I think the read-out from that meeting says that
 18 it was agreed that it was the right time to implement
 19 measures sooner than had been envisaged. And then the
 20 summary, the read-out from the follow-up meeting, on
 21 the 15th, was that measures should be brought to COBR,
 22 the actual official decision-making forum, that meeting
 23 happened on the Monday, to take -- you know, to
 24 implement advisory measures on working from home,
 25 staying at home, not going to pubs and restaurants,

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1 a certain date. I more recall discussions happening in
 2 real time that led to the sort of announcements on
 3 16 March, the closing of schools further -- later that
 4 week, the further restrictions I think that were
 5 announced on the Friday --

6 **Q.** Pausing there.

7 **A.** -- which all then ...

8 **LADY HALLETT:** Let him finish, I think it might be quicker
 9 in the long run, Mr Keating.

10 **MR KEATING:** Forgive me.

11 **A.** But then the realisation the following weekend or the
 12 advice the following weekend that there was a need to go
 13 further and hence the -- what we now know as a lockdown
 14 being implemented on the 23rd.

15 **Q.** So it was a case more of rolling measures of NPIs which
 16 then evolved into a lockdown?

17 **A.** Yes, in the light of the --

18 **Q.** Yes.

19 **A.** -- data being updated and our, you know, increasing
 20 awareness of the situation.

21 **Q.** The last question on this: was it the case from 14 March
 22 that the Prime Minister expressed that there was a need
 23 to play for time before imposing greater restrictions
 24 such as a lockdown?

25 **A.** No, I don't recall that.

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1 ie the sorts of things that the Prime Minister then
 2 announced on the 16th.

3 So sort of looking back at the records, from my
 4 recollection, the discussions that weekend played into
 5 the measures that the Prime Minister announced on
 6 the 16th. Which at the time felt very significant
 7 interventions. It's not --

8 **Q.** Yes.

9 **A.** I can't think of any other time in recent history
 10 a Prime Minister has announced those sorts of measures.

11 **Q.** So pausing there --

12 **A.** What I -- okay.

13 **Q.** Was there -- from what your -- the short answer is,
 14 well, no, there wasn't a discussion about having
 15 a lockdown, there was a discussion regarding
 16 an agreement regarding more restrictions, more NPIs; was
 17 that the position?

18 **A.** Well, I think significant ramping up of the NPIs.
 19 I guess the point I'm trying to make is that from after
 20 the event we have quite a strong concept of lockdown,
 21 what exactly that entails, the different elements of
 22 that is sort of embodied in 23 March. I don't -- from
 23 my recollection, I don't recall, certainly not,
 24 you know, widespread understanding of that being the
 25 thing that ought to happen or we ought to get there by

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1 **Q.** No recollection?

2 **A.** No.

3 **Q.** I'm going to move on to the economic aspects, which is
 4 a central aspect of your evidence today.

5 You mentioned, and we touched upon it already, that
 6 HMT, Her Majesty's Treasury, was a core part of your
 7 role, and, again obvious, HMT having a central role in
 8 government really because of the financial aspect; is
 9 that fair?

10 **A.** Yes.

11 **Q.** You mention at paragraph 31 of your statement that one
 12 aspect of your role is to crystallise the options for
 13 the Chancellor and the PM in the round, having regard to
 14 the choices, priorities and the trade-offs inherent in
 15 economic and fiscal policy, and you were the lead
 16 between, as we've discussed already, the Chancellor and
 17 the Prime Minister in that respect.

18 Drawing your evidence together on this is that in
 19 that sort of crystallisation of the options role, is it
 20 right that you would commission and communicate data
 21 analysis and advice, prepare meetings, and commission
 22 advice as necessary?

23 **A.** Yeah. I mean, I think it's the Treasury's job to
 24 crystallise the options and, as you say, in the round,
 25 ie looking at the interlinkages or the trade-offs

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1 between them. My role, slightly more mundanely, was to
2 sort of help prepare the meetings for the Chancellor and
3 the Prime Minister to discuss those. I mean, you know,
4 for example, as would then be decided or announced by
5 the Chancellor at budgets or spending reviews --

6 **Q.** Yes.

7 **A.** -- in normal times.

8 **Q.** But in any event, you were a key conduit between
9 Number 10 and HMT?

10 **A.** Yes.

11 **Q.** In terms of what information, what economic information
12 the Prime Minister was receiving via HMT and from other
13 sources, coming in at times through you, you touch upon
14 this at paragraph 36 -- perhaps we could bring that up.

15 "... I sought to ensure that the Prime Minister ...
16 [had] ... the latest economic and financial information
17 received from HMT ... [appraisal] of relevant economic
18 analysis pertaining to specific options for managing the
19 pandemic; and ... [he was] able to engage the Chancellor
20 on decision-making on economic and fiscal policy ..."

21 So that he was informed to respond to the
22 Chancellor.

23 How was that done? How did you ensure that he had
24 that information?

25 **A.** Well, I'll perhaps work through the three elements

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1 **Q.** -- yes. While we're talking about it, let's deal with
2 it, because you mention at paragraph 40 of your
3 statement that you sought to systemise the economic
4 briefing for the Prime Minister and you established
5 a series of economic dashboard meetings which ran from
6 June 2020, and these took place roughly every three or
7 four weeks in sequence, and that was in parallel to the
8 reporting of information that was available.

9 Why did you feel the need to systemise the economic
10 briefing in June 2020?

11 **A.** Well, as I say, I think, you know, there's
12 an established practice for the chance -- you know,
13 there's various means by which the Chancellor and the
14 Treasury on his behalf provide this sort of analysis to
15 the Prime Minister in normal times, like directly in
16 meetings or bilateral meetings that they might have
17 together, or through sort of written briefing, but the
18 thought here is just the scale of the, you know, issues
19 and impacts from the virus or the measures taken to
20 manage the virus meant and the speed at which they were
21 sometimes moving made Treasury colleagues and I think
22 that it was worth having -- I think you said three to
23 four weeks, I think there were initially weekly meetings
24 actually. For much of that for 2020, I think there were
25 pretty much weekly meetings, to take the Prime Minister

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1 briefly to give a sense of this.

2 So I think the first part of the Chancellor's role
3 in providing economic advice to the Prime Minister,
4 obviously supported by the Treasury, is at point (a)
5 here, giving a description of the latest economic
6 situation, financial information.

7 During the pandemic, we instigated, I instigated
8 a regular series of economy dashboard meetings which for
9 the chief economic adviser, you heard from earlier,
10 to -- and colleagues in the Cabinet Office and on
11 occasion from other departments to present to the
12 Prime Minister, that sort of picture, building on --
13 I mean, that -- we instigated that because of the sheer
14 scale and pace of the issues that were evolving at the
15 time, but it builds on regular weekly briefings, market
16 updates that are coming through by email that I would
17 then, you know, put in the PM's box as relevant -- So
18 there's an established way of doing that that we built
19 on.

20 On the second --

21 **Q.** Sorry, would you like -- because it's one of the topics
22 I was going to explore, why don't we deal with it
23 sequentially, because there's a section on economic
24 dashboards --

25 **A.** Okay.

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1 through the latest on employment, inflation, how
2 different sectors are doing, different regions are
3 doing, consumer behaviour, business behaviour. This all
4 sounds quite dry, but it is the info -- the data that
5 relates to people's lives --

6 **Q.** Yes.

7 **A.** -- and livelihoods.

8 **Q.** Well, let's -- we can look at the notes and
9 illustrations so people know what you're talking about.
10 You said there were weekly -- I was quoting you -- three
11 to four --

12 **A.** Okay.

13 **Q.** -- times a week, but I'm quite happy for that
14 clarification.

15 In terms of attendees, and we'll look at one in
16 a moment, those who were present at these meetings, is
17 it right it was the chief economic adviser from HMT,
18 other senior officials, and on occasion would the CMO or
19 the CSA be at any of these meetings?

20 **A.** So for the most part the Cabinet Office sort of brought
21 these together, so a senior official in the
22 Cabinet Office with the chief economic adviser. On
23 occasion I think maybe some officials from other
24 departments. If some of the data related to sort of
25 businesses, you might have someone from the Business

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1 Department would be present as well, and then I think
 2 CMO or CSA did attend a couple -- you know, some of
 3 these meetings as well.
 4 **Q.** Let's look at one. So it's a dashboard which was
 5 prepared to show at the meeting.
 6 INQ000281288, please.
 7 And this is one of your exhibits, and it's
 8 dashboard 14. So we're looking at this as
 9 an illustration of one type of way economic information
 10 was fed through to the Prime Minister.
 11 If we could turn to page 2, please, this is just
 12 a snapshot of what would be referred to -- retail sales,
 13 consumer and business confidence, and the labour market.
 14 Let's look at page 3 just for a moment. The graphs
 15 perhaps speak for itself.
 16 Page 4, at this stage we're 29 October, we have "Eat
 17 Out and Mobility". We see there on the graph, the blue
 18 line, that there was -- for the UK average, that there
 19 was a significant increase in eating out at that stage
 20 as a result of that scheme; is that correct?
 21 **A.** I think that's what it shows, yes.
 22 **Q.** Yes. Perhaps we could deal with, whilst we're dealing
 23 with information, pause and deal with Eat Out to Help
 24 Out, and your knowledge of it from the Number 10
 25 perspective. We have heard some evidence already this

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1 in place at the time, or the guidelines that had been
 2 developed and announced, and, you know, I think 23 June
 3 the Cabinet decided to open, you know, hospitality --
 4 **Q.** Yes.
 5 **A.** -- as part of a wider approach of incorporating
 6 a sort of Covid-secure, you know, regime --
 7 a Covid-secure sort of way of living, with, you know,
 8 use of table service, restrictions on group size,
 9 maintaining safe distance in the space. And I think
 10 that was, you know, the wider regime for managing the
 11 virus and then this economic policy was designed --
 12 I mean, as I understand it reading the Treasury material
 13 now --
 14 **Q.** Yes.
 15 **A.** -- was designed to sort of fit in within that.
 16 **Q.** So what I'd like you to do is, putting aside the
 17 Treasury perspective at the moment, is from your
 18 perspective, Number 10, about your knowledge of this
 19 scheme and how it evolved.
 20 It probably flows from your answer already, this was
 21 something which was, am I right in understanding, was
 22 driven by HMT and the Chancellor as a scheme; is that
 23 correct?
 24 **A.** Yes.
 25 **Q.** In terms of its formulation, when did you at Number 10,

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1 morning from Ms Lombardelli from the HMT perspective.
 2 Eat Out to Help Out, would you agree, a significant
 3 economic measure that summer?
 4 **A.** It was a -- I think it was a reasonably significant
 5 economic measure. It was part of the summer economic
 6 plan the Chancellor announced on 8 July, I think, and
 7 one measure amongst several, including, I think,
 8 a sort of £9 billion job retention scheme and
 9 a £14 billion business rates support, £9 billion on
 10 grants, sort of £3 billion, you know, cut in stamp duty,
 11 and this measure was one part of that package. I think
 12 actually the cost of it was only a few hundred million,
 13 so from the sort of purely fiscal scale it was -- you
 14 know, I think it was only a few percentage points, as it
 15 were, of the overall economic package that the
 16 Chancellor did announce at that time, but obviously it
 17 was a significant measure.
 18 **Q.** Yes, significant measure, significant in terms of trying
 19 to change human behaviour and to get consumers out into
 20 society; is that a fair summary?
 21 **A.** I think it is. I mean, I recall a bit from the time,
 22 but also -- but have sort of looked at some of the
 23 documents since in preparing for this, that I think the
 24 Treasury and the Chancellor, you know, sought to design
 25 the scheme to operate within the wider Covid framework

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1 as that sort of conduit with the Treasury, when did you
 2 become aware of this scheme was about to launch?
 3 **A.** I think it was in a meeting on 2 July when the
 4 Chancellor took the Prime Minister through in fact the
 5 overall summer economic plan that we've mentioned.
 6 I mean, there -- at some point in late May the
 7 Chancellor had done a very, very high level view of
 8 sort of his early thinking, where, you know, he'd
 9 mentioned, you know, the idea of sort of targeted tax
 10 cuts or a subsidy scheme, sort of that level of detail,
 11 but something that looks like Eat Out to Help Out was
 12 something I heard about on 2 July.
 13 **Q.** Yes. And was there no awareness -- or did there become
 14 an awareness at Number 10 that there was no scientific
 15 analysis of the impact this scheme would have on the
 16 virus?
 17 **A.** I don't recall whether that was discussed in that
 18 meeting.
 19 **Q.** And thereafter we had this period from July until the
 20 launch of the scheme in August; was there any knowledge
 21 in that intervening period of the absence of scientific
 22 evidence?
 23 **A.** I think I and others in Number 10, you know, did become
 24 aware that, as you say, there hadn't been direct CMO,
 25 CSA, SAGE analysis or advice on this policy, so we did

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1 come to know that.

2 **Q.** When -- you say before the launch of the scheme in
3 August?

4 **A.** Yes.

5 **Q.** And was it the case that a view was taken, "Well, we're
6 going to persist with the scheme in any event"?

7 **A.** Well, I don't -- I mean, I can't speak on behalf of,
8 you know, all people who would have had an interest in
9 this. I don't recall, you know, significant sort of
10 representations being made to sort of in some sense
11 revisit the policy. That's not to say that some people
12 didn't have views or -- you know, one way or another at
13 that time, but in the sort of wider context was -- as
14 I say, this was one measure in -- in a purely sort of
15 fiscal sense, quite a small measure amongst the whole
16 wider economic package. And, you know, some awareness
17 that this was the sort of type of scheme that was being
18 implemented in other countries as well.

19 **Q.** No more on Eat Out to Help Out.

20 Let's return back to the dashboard and go to page 5,
21 please.

22 We're going to look at two more pages on this slide
23 and then put it to one side. Here, again, is the
24 sort of information which the Prime Minister would see,
25 and other key decision-makers. We see "Consumer and

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1 discussion at different points about the hospitality
2 sector, the very significant impact of the virus on that
3 sector, and the fact that its workforce is
4 disproportionately young and lower paid, from ethnic
5 minority --

6 **Q.** Yes.

7 **A.** -- and female, in fact, and that that sort of --

8 I recall that being the sort of issue that was being
9 discussed off the back of this information.

10 I think the second thing I stressed -- I would
11 stress as well is that the purpose of this tool was
12 a sort of -- the provision of information, contextual
13 data for the Prime Minister, building on -- I mean, some
14 of -- a lot of this data was in the main Covid dashboard
15 as well --

16 **Q.** Yes.

17 **A.** -- used in those much more -- even more frequent
18 meetings, but this sort of built that out a bit further
19 for the Prime Minister.

20 The policy -- the advice on what measures to take to
21 manage the virus, what, you know, restrictions to impose
22 or, you know, how and when to lift certain measures as
23 the virus is abating, that was brought together by the
24 Cabinet Office with input from the Treasury on that
25 policy, and my very strong recollection is that,

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1 Business Confidence" and its negativity during that
2 period. And lastly we see, if we could turn to page 7,
3 which are -- and page 8, please. Thank you.

4 In terms of the parts of the economy, the sectors
5 which were presented in this information, we can see it
6 was broken down into sectors which could operate
7 remotely, those which required a physical presence of
8 workers and those which required a physical presence of
9 consumers.

10 That's how the sectors were divided; is that
11 correct?

12 **A.** Yes.

13 **Q.** And one question is this: in relation to the economic
14 data which has been funnelled through and represented in
15 these dashboards, or other dashboards around that time,
16 did it consider the impact on different socioeconomic
17 groups or different ethnic groups?

18 **A.** I think -- I mean, I don't have in my mind the precise
19 content of all of them. We had, I think, around 40 of
20 these meetings sort of through 2020 and 2021, so I can't
21 recall the precise content. I mean, we followed a broad
22 template, but it evolved over time.

23 I think -- I mean, two thoughts. One, in these
24 meetings is sort of facilitated precisely that
25 discussion, for example there was quite a lot of

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1 you know, those key bits of advice from, you know, the
2 Cabinet Office for the Prime Minister, for Covid-O,
3 Covid-S meetings, the main committee meetings you have
4 heard about previously, all included sort of equalities
5 information, the impact of the virus and how that
6 actually itself was having disproportionate impacts on,
7 for example, certain ethnicity minorities --

8 **Q.** Pausing there --

9 **A.** -- and -- I'll just finish the point --

10 **Q.** Yes.

11 **A.** -- just on -- and the economic -- you know, the economic
12 measures of closing or opening certain sectors or taking
13 measures in certain regions might have particular
14 impacts as well. So those policy documents did contain
15 that sort of information.

16 **Q.** We're aware of the wider information. I was just asking
17 in relation to economic effect in relation to ethnic
18 groups or socioeconomic groups, whether that was
19 presented in a dashboard. Can you do -- can you assist
20 the Inquiry, go back over those dashboards, check what
21 the position is and whether this is a representative
22 dashboard and then we'll know whether that data comes
23 through, please.

24 Another source of information, economic information,
25 between -- for the Prime Minister was the bilateral

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1 meetings with the Chancellor, and in relation to those,
2 we've heard a little bit about them, they were meetings
3 which took place in any event, they were a regular
4 feature pre-and perhaps post-Covid.

5 But one question is this, in relation to the amount
6 of meetings going on at that time, 09.15 meetings,
7 Covid-S, the quad, the Cabinet: why was there a need for
8 these bilateral meetings between the Chancellor and
9 Prime Minister only at that time?

10 **A.** I think the Prime Minister had bilateral meetings with
11 a range of his colleagues. I mean, he does in normal
12 times and he did in this time. I mean, that is a normal
13 feature of government, for the Prime Minister to meet
14 specific colleagues to discuss issues in their
15 portfolio.

16 The main items being discussed in these specific
17 meetings was on sort of economic interventions or
18 economic support measures. So I mentioned earlier that,
19 you know, the Prime Minister typically in committee
20 meetings would decide what, how -- what measures to take
21 to respond to the virus, what restrictions to impose,
22 which restrictions to lift. Once sort of that path is
23 set, as it were, at a point in time, there would then be
24 a need for the government to consider what economic
25 measures to take. So, for example, in March 2020 we've

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1 What, where they are, in effect, the decision-making
2 meeting is on these economic policy, furlough, scheme
3 for the self-employed, loans, grants, and that is
4 actually I think a pretty long established convention,
5 that on -- you know, it may even be enshrined, I think,
6 in the Cabinet Manual -- that on those sorts of economic
7 policies which in normal times typically manifest
8 themselves in budgets, but here we were having sort of
9 announcements quite -- more frequently than that, those
10 decisions were for the Prime Minister and the Chancellor
11 to take together.

12 **Q.** Thank you.

13 Four remaining topics which we're going to cover
14 before lunchtime, and one of them is synthesiser, your
15 role, and what does that mean?

16 So you mention in your statement that at
17 paragraph 51 you saw your role as:

18 "... to ensure input from across government was
19 synthesised in order to help the Prime Minister bring
20 together the range of views -- sometimes opposing -- so
21 that he could make decisions effectively and on
22 an informed basis. This was a two-way process, in
23 a sense that my role also involved communicating the
24 Prime Minister's steers, and decisions, colleagues ..."

25 And that's something, in a report, we're going to

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1 locked down, the Treasury bring forward a proposal on
2 furlough to support workers at that time, and the sorts
3 of measures I mentioned earlier in summer, economic
4 plan, the tax measures, stamp duty, et cetera, and those
5 tax and spend measures, as it were, conditioned on the
6 wider context as set out -- you know, as determined by
7 the virus, as determined by other decisions, those would
8 be the ones that principally the Prime Minister and
9 Chancellor would discuss in their bilateral meetings.

10 **Q.** Could I ask one question in relation to that, which is
11 this: you mentioned that these meetings were in terms
12 largely if not solely for support in relation to
13 decisions and strategy which had been agreed, economic
14 support. Was it ever that these meetings were an area
15 where the Chancellor or the Prime Minister would look to
16 review or finalise a strategy such as lockdown?

17 **A.** I think the Prime Minister and the Chancellor did
18 discuss in some of these meetings the question of how to
19 manage the virus, as I imagine the Prime Minister did
20 with -- in his meetings with the Health Secretary and,
21 you know, as relevant to Education Secretary as well.

22 They weren't the decision-making forums for those
23 decisions. That would be the meetings in -- well,
24 ultimately Cabinet, but the Covid-O, Covid-S committee
25 meetings with the range of ministers in them.

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1 touch upon in a moment, is that the synthesisation of
2 information.

3 Are you content with what you set out there; is that
4 an accurate representation of your role, synthesising
5 information for the Prime Minister?

6 **A.** I think it may not be 100% clear, just to come back to
7 some of what we were discussing a moment ago. I mean,
8 from my role, as me as an individual being the point
9 person with the Treasury and the Chancellor's team,
10 you know, there would be these sort of data flows that
11 I mentioned earlier, weekly briefing, market data and
12 the like, that, you know, I'd have sight of and put to
13 the PM as relevant, you know, new -- you know, as it
14 emerges.

15 On the bit -- I would just sort of underscore,
16 linking back towards it, that the bringing together of
17 the analysis and the policy on the management of the
18 pandemic, that's what the Cabinet Office did, taking,
19 you know, predominant -- primarily the health data, the
20 scientific analysis, but also, alongside that, the
21 economic data on sectors and region -- you know,
22 different bits of the country, and the like. And that
23 would -- they would bring that together in the papers
24 for the sort of committee meetings. So I wasn't there
25 writing lots of primary, you know, documentation for the

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1 Prime Minister. The sort of much larger team in the
 2 Cabinet Office was doing that.

3 **Q.** Your role, as we discussed already, was a conduit, not
 4 as a policymaker --

5 **A.** Exactly.

6 **Q.** -- or policy adviser?

7 **A.** Exactly.

8 **Q.** I want to turn to the Institute for Government report,
 9 which you've seen already. It's entitled "The Treasury
 10 during Covid. What lessons can be learned from the
 11 pandemic?" Dated April 2023. And again, this is
 12 the part function of the Inquiry, lessons learned, so
 13 I would like your assistance in relation to this.
 14 You've seen it already, as I mentioned.

15 Perhaps we could bring it up. It's INQ00226497, at
 16 page 1, please.

17 And the Inquiry has also heard evidence from
 18 Alex Thomas, who is from that organisation as well. So
 19 there we see the front page, and the authors, and it's
 20 a 108-page report, we're not going to turn to each and
 21 every page, but I'd like you to -- it's probably correct
 22 to recognise that the report talks and outlines the
 23 positive aspects of the Treasury response. It includes
 24 financial support, engagement with other departments.
 25 So it outlines some positive aspects to the Treasury

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1 Treasury's mindset. I mean, I was managing some of the
 2 processes that we're -- we have been talking about
 3 earlier. What I do know is obviously the Treasury --
 4 you know, the Treasury had the same scientific analysis
 5 and information as everyone else in government at this
 6 time, and also -- I mean, this obviously relates to
 7 a specific period of time. I think there were quite --
 8 there were several discussions, sort of committee
 9 meetings, to think about sort of future strategy should
 10 the second wave come forward. You know, to continuously
 11 plan or prepare for that in the summer, which I know the
 12 Treasury team helped prepare and the Chancellor
 13 participated in, so I think that's my understanding.

14 **Q.** Information sharing and data is our next point, let's go
 15 to page 6, please, and it should be our second bullet
 16 point. It set out what we've discussed already, that:
 17 "... the main responsibility for synthesising
 18 evidence from across government to inform central
 19 decision making ..."

20 Is with Cabinet Office.

21 "But the Treasury, as a powerful player at the
 22 centre of government, had an important role to play too
 23 and had ability to advocate for and generate better
 24 information sharing."

25 Again, perhaps uncontroversial, but do you agree

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1 response.

2 I wish to have your perspective on some of their
 3 other observations which maybe fall within that lessons
 4 learned category, and one of those is optimism bias, and
 5 perhaps we could turn to page 7 in relation to that.
 6 I'll bring up the text, I'll read it out to you and I'll
 7 ask for your perspective and experience.

8 Bottom of the page:

9 "During the summer and autumn of 2020, the Treasury
 10 appears to have suffered from an optimism bias that the
 11 government's public health advisers did not share ...
 12 This led the Treasury to: not implement some relatively
 13 easy improvements to support schemes; implement the Eat
 14 Out to Help Out policy in summer 2020, which was
 15 inconsistent with scientific advisers' assessment of the
 16 risk of a second wave; and announce very late the
 17 extension of furlough in autumn 2020."

18 The whole text is there, I've read out most but not
 19 all.

20 From your perspective, from being the conduit, is
 21 that a description which you could relate to, that there
 22 was a degree of optimism bias in summer and autumn 2020?

23 **A.** I mean, obviously my role is -- I was in Number 10
 24 supporting the Prime Minister, I find it a bit difficult
 25 to comment on the -- what the -- is somehow the

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1 with that summary of the roles?

2 **A.** I agree with the -- I agree with the summary of the
 3 roles, I think it says the same thing that we were
 4 discussing earlier about the role of the Cabinet Office.

5 **Q.** Within that context, if we could pan out to look at the
 6 third paragraph, please, it says this:
 7 "There was a stark contrast in the transparency of
 8 economic evidence informing ministers' decisions
 9 compared with the scientific evidence. Very little of
 10 the social and economic evidence that informed
 11 ministers' decisions was published, particularly before
 12 2021, and the Treasury shared almost none of its
 13 analysis externally, even with trusted experts. This
 14 lack of transparency hampered effective synthesis of
 15 evidence (and thus decision making) and may have
 16 undermined the government's ability to convince the
 17 public of the merits of public health restrictions."

18 Pausing there for a moment, do you agree with that
 19 analysis that there was a lack of transparency of
 20 information from the Treasury?

21 **A.** Again, the perspective I can speak from is sort of
 22 within Number 10, and the Prime Minister I think did
 23 receive a lot of information in the different ways that
 24 we've discussed, and I won't sort of go over them all,
 25 again, but, you know, on the wider economic situation,

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1 the economic analysis relating to sort of the measures
2 taken to manage the virus and on options and ideas for
3 economic support. And in the different ways and
4 different forums that we've -- that we've mentioned.

5 As I read this, this is sort of perhaps
6 an observation about transparency not with Number 10 but
7 more widely in government or beyond that, and, I mean,
8 I ... from the role I was doing, you know, that's not
9 something I had so much of a clear view on.

10 **Q.** There is one part which does touch upon you, because it
11 suggests this, that this lack of transparency hampered
12 the effective synthesis of evidence, which is the
13 Cabinet Office/Number 10's role. Do you agree with that
14 observation in this report?

15 **A.** I don't recall having that thought at the time, no.

16 **Q.** If we go -- continue down, please.

17 **LADY HALLETT:** I suppose it would depend on who had the
18 information and what do you mean by being transparent.
19 Do you mean telling the public, do you mean telling
20 other people who need to know, I suppose?

21 **A.** Well, sorry, as ...?

22 **LADY HALLETT:** The synthesis would only be effected if the
23 people who needed the information didn't get it.

24 **A.** Sorry, I don't quite follow the point.

25 **LADY HALLETT:** No, well, probably I'm not making --
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1 the document are criticising the transparency of the
2 Treasury, it all depends on what they mean by
3 transparent: do they mean telling Cabinet Office or do
4 they mean telling the public?

5 **A.** Yeah.

6 **LADY HALLETT:** Sorry, that was the --

7 **A.** Yes.

8 **LADY HALLETT:** I tell you what you can probably help on. In
9 normal circumstances -- this was obviously a time of
10 national emergency -- in normal circumstances would you
11 expect the advice that the Treasury gives to the
12 Prime Minister and to the Cabinet Office to synthesise
13 for the Prime Minister to be made public at the time, or
14 at all?

15 **A.** Well, I think in a sense that's what budget documents or
16 spending review documents do. In normal times the
17 government makes -- the Treasury, you know, sets out
18 a whole bundle of decisions on tax and spending and
19 other measures and sets out the relevant analysis, or
20 indeed, actually -- well, sorry, sets out the relevant
21 thinking and some of the analysis behind some of those
22 policies, with a much fuller sort of exposition on the
23 fiscal and economic impacts context in the associated
24 documents from the Office for Budget Responsibility, now
25 that, you know, that exists, to play that independent --
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1 **MR KEATING:** It's probably my fault for -- effectively it's
2 this: those questions in the report, you were
3 responsible, the Cabinet Office was responsible, for the
4 synthesis of the evidence, and the IFG report says --
5 after drawing in observations and soundings from
6 a number of different sources says that there was a lack
7 of transparency at HMT, which impacted, they say,
8 Number 10's ability to synthesise the evidence. So
9 that's the suggestion. What do you say to that?

10 **A.** Well, I think the same point I had earlier. I didn't
11 have that -- that feeling at the time, so in terms of
12 the Treasury's input to the Cabinet Office, I --
13 you know, well, I guess that's my answer. I think maybe
14 if your point was that before that could the Treasury
15 have gone about its business in a different way in terms
16 of what it was gathering or understanding and testing
17 out with other ... I mean, I find it a bit ... I mean --
18 I --

19 **LADY HALLETT:** No, sorry --

20 **A.** I don't feel that I could sort of comment on how
21 the Treasury goes about its business, as it were, before
22 it then turns to the Cabinet Office or Number 10.

23 **LADY HALLETT:** No, sorry, my point was, and perhaps it's
24 unfair on you, it should go to the authors of
25 the document, but it all depends -- if the authors of
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1 independent role.

2 Obviously what was happening at this time was more
3 frequent decisions in slightly more improvised ways.

4 **LADY HALLETT:** Sorry to interrupt, Mr Keating.

5 **MR KEATING:** Not at all, my Lady.

6 Information sharing, I'm just going to continue with
7 this theme a little bit longer, if we could turn to
8 page 7, please. It suggests that there was the
9 strategic sharing of information by HMT, and I want to
10 ask you about that.

11 It says this:

12 "... the Treasury -- shared analysis strategically
13 to support their particular point of view, with the
14 chancellor feeling he needed to 'make the economic case'
15 as a counter to 'the health case' that the health
16 minister was making. This contributed to decision
17 making becoming a tug-of-war in autumn 2020, which led
18 to sub-optimal decision-making."

19 So this phraseology regarding a tug-of-war in
20 autumn 2020 -- thank you for bringing that up -- was
21 there this binary or separation between science and
22 Health on one side and the economy and Treasury on the
23 other side as we left lockdown 1 and emerged into summer
24 and autumn 2020, from your experience at Number 10?

25 **A.** Well, I think ... I mean, are you thinking in the
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1 September period now?

2 **Q.** As we -- as lockdown eased, restrictions eased, and
3 especially entering September onwards, the
4 circuit breaker thereafter, was there this, as these
5 authors described it, a tug-of-war between Treasury on
6 one side and Health on the other side?

7 **A.** I think in September obviously cases were picking up,
8 and the emergence of the second wave, perhaps
9 foreshadowed by the experience of other European
10 countries, that's the sort of situation we were -- we
11 were in, and that was a challenge that was faced,
12 you know, over a couple of months, right up until the
13 final decision to do the second lockdown at the end of
14 October, and so it was discussed, you know, multiple
15 times in multiple forums through September, in October,
16 the PM being briefed by the medical -- you know, the
17 Chief Scientific Adviser and Chief Medical Officer
18 meeting independent scientists and I think meeting --
19 you have heard about from other witnesses, and
20 discussing the circuit breaker idea, and then in
21 committee meetings where ultimately he decided -- the
22 Prime Minister -- not to do the circuit breaker, to do
23 other measures, the rule of six at the start of
24 September, toughening the tier system in October,
25 I think other measures about 22 September as well.

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1 especially?

2 **A.** I think -- I mean, I've mentioned that the discussions
3 took place in multiple -- in multiple meetings and ahead
4 of the Prime Minister making decisions at sort of
5 different points in time on the circuit breaker idea and
6 then, ultimately, 30 October on the second lockdown, and
7 there were, well, as we said earlier, debates in those
8 meetings.

9 I think -- I mean, it's also the case that --
10 I mean, take -- you mentioned sort of the whole period
11 of 2020, the ability of the sort of the Cabinet Office
12 to sort of have a -- its sort of central -- its ability
13 to bring together the analysis from the science and the
14 health and the economic side to inform the advice it was
15 synthesising, it was bringing together, did, as you
16 would expect, from this period, improve over time,
17 through 2020 and into 2021.

18 So that's my main thought on the last point here.

19 **Q.** So is this fair, your evidence is that things improved?

20 **A.** In terms of the ability -- the bringing together of all
21 of this information. I think it was all on the table at
22 the relevant points, but the sort of sophistication of
23 that analytical integration did improve through 2020
24 into 2021, informing the second roadmap, and the nature
25 of the sort of overall government operation in 2021 felt

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1 And in -- so discussed in multiple forums, getting
2 information from lots of angles. I think, you know,
3 it's known that the scientific advisers were -- were --
4 you know, like SAGE, advocated a circuit breaker I think
5 on the 21st --

6 **Q.** Yes.

7 **A.** And I think it's known or the -- you know, the
8 Chancellor is on record, he did an interview in
9 March 2021 saying he was opposed to the circuit breaker.
10 So I think those positions are -- you probably know
11 them.

12 **Q.** Well, asking your -- giving you the opportunity to give
13 evidence from your perspective as Number 10 as somebody
14 who was synthesising information from an economic
15 perspective, and those discussions which were taking
16 place, the last point on this, which is set out at
17 page 61 of the report, says this:

18 "Interviewees involved in discussions over social
19 restrictions variously described central decision making
20 for much of 2020 as 'a bit of a Punch and Judy',
21 'enormously chaotic', 'a tug of war' and simply '[not]
22 a proper bringing together of science, public health and
23 economic considerations'."

24 Now, is that a fair assessment, from your
25 perspective, of those discussions in the autumn of 2020

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1 a bit different than it might have done in March 2020,
2 and I suppose that's not necessarily a surprise given
3 the nature of the challenge we faced.

4 **Q.** We're now going to demonstrate the economic efficiency
5 in use of time, three points, five minutes.

6 The first point is this, let's open up, please,
7 INQ000273901 at page 373. You've seen this already and
8 it's really just to assist you in relation to a point
9 I'd like to ask you about.

10 So that's INQ000273901, and that should be page 373.

11 It relates to this, while that's being brought up,
12 as you've seen this already, is that: was HMT, to your
13 knowledge, the way that it was pressing economic
14 interests in discussions, did it create an environment
15 where the Treasury and the Chancellor were pejoratively
16 termed as "pro death"? Was that a phrase that you
17 heard -- I'm not suggesting you used it -- you heard
18 being used pejoratively in and around Number 10?

19 **A.** I don't recall that phrase, no.

20 **Q.** And that there is an entry which you have seen which is
21 in front of you, a hard copy, at a meeting on
22 25 January 2021, the PM is recorded as saying that he
23 wants Tier 3, March 1, Tier 2, April 1, Tier 1, May 1,
24 and nothing by September, and he ends up by saying the
25 team must "bring in the pro death squad from HMT".

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1 A meeting, an economic meeting, this is
2 Sir Patrick Vallance's dairies, you've got the entry in
3 front of us, I'm sorry you don't have it on the screen
4 in front of you, but do you recall the phraseology by
5 the Prime Minister referring to HMT as the "pro death"
6 squad?

7 **A.** As I say, I think it refers to a meeting a couple of
8 years ago. I don't recall that specific phrase.
9 I mean, I see that this is from Patrick's notebook,
10 I wouldn't dispute what he has recorded but I don't
11 recall the phrase at all.

12 I mean, I think -- I mean, is it helpful to say
13 a bit more about what's going on at this time, or do you
14 want to move --

15 **Q.** No, no, thank you. I'm just asking for your
16 recollection.

17 Second, penultimate, point is the interests of the
18 elderly. In the discussions especially in the autumn of
19 2020, do you recall the Prime Minister referring to the
20 interests of the elderly, how effectively older people
21 should accept their fate and tell the young to get on
22 with life and the economy going.

23 Was that something in your dialogue with him that
24 emerged in discussions?

25 **A.** I think this is another extract from Patrick's diary on
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1 and one of the matters in that report which we've
2 touched upon, we don't need to bring this screen up, is
3 whether there should have been an economic or
4 socioeconomic equivalent of SAGE to assist
5 decision-makers with analysis of the trade-offs of
6 decision-making.

7 I'm going to ask your opinion, because you were at
8 Number 10, now you're back at HMT, what's your view in
9 terms of a recommendation or lessons learned of
10 an economic SAGE, so to speak?

11 **A.** Well, thank you, I mean, I'm aware of the idea, I've
12 seen it come up in some of the other evidence here,
13 it's -- I don't think it was something that was ever
14 formally proposed to the Prime -- as far as I'm aware,
15 to the Prime Minister or indeed something that he
16 proposed to the Treasury, as it were.

17 But in terms of my perspective, I think -- you know,
18 my understanding is that SAGE itself filled a gap that
19 existed in providing sort of scientific advice on the
20 virus and there's no other element of government that in
21 place, standing function, to do that, and therefore it
22 was obviously necessary for SAGE to take that role.

23 On the economics, the sort of Treasury exists to do
24 that in some sense. You've got a standing economic unit
25 within the Treasury -- I didn't see the chief economic
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1 26 August.

2 **Q.** It is.

3 **A.** I mean, I know that --

4 **Q.** We can bring that up if you wish. That's INQ000273 --

5 **LADY HALLETT:** We don't need to bother. Did you hear it,
6 Mr Glassborow, or not?

7 **A.** I mean, this is, I think, from a WhatsApp group that
8 I wasn't part of, on a date -- or time when I was on
9 leave, so I don't have an awareness of this --

10 **MR KEATING:** I'd like you to just bear with me and listen to
11 the question a little bit more. I'm not suggesting you
12 were on a WhatsApp group, but Sir Patrick Vallance in
13 the two extracts you were shown refers to the word
14 "obsessed", the Prime Minister "obsessed" by this. Was
15 it the case in your -- as the economic conduit dealing
16 with him, that he ever used that phraseology referring
17 to the interests of the elderly?

18 **A.** No, I don't recall him using --

19 **Q.** I'm asking for your recollection. It's not written down
20 on a piece of paper.

21 **A.** No, no, I don't recall -- I'm just thinking about that
22 period of time. I don't recall that sort of phraseology
23 in the space that I think you're referring to.

24 **Q.** Thank you.

25 Last question, and turning back to lessons learned,
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1 adviser's evidence earlier, but -- I mean, she may
2 disagree, may have disagreed -- that -- you've got the
3 economic -- who are plugged into the Office for Budget
4 Responsibility, the Bank of England, international
5 groups such as the IMF, the OECD, think tanks,
6 academics, and so in that sense, for the sorts of
7 products we were looking at earlier, like those
8 dashboards, they are bringing together information, data
9 and analysis from all of those sources, following
10 a sort of playbook or way of working that I think has
11 been -- that I would recognise from having been in the
12 Treasury previously and so feels -- feels familiar.

13 Now, I can obviously understand and I know I think
14 in their corporate witness statement the Treasury
15 referred to sort of, you know, market sensitivities of
16 putting out, you know, certain information at certain
17 times, but, I mean, my own personal reflection is that,
18 you know, in a sort of fast-moving crisis, unprecedented
19 situation such as a pandemic, I could imagine the
20 sharing or testing of some of that in a bit -- some of
21 that work a bit publicly than might normally take place.
22 So I think the function and the role and the work
23 already exists, it's -- well, it links back to your
24 point on transparency earlier.

25 **MR KEATING:** External transparency.

1 Mr Glassborow, very grateful.
 2 My Lady, I'm sorry we've encroached beyond
 3 lunchtime, but unless you have any questions that's all
 4 I wish to ask.
 5 **LADY HALLETT:** Thank you very much indeed, Mr Glassborow,
 6 thank you for your help.
 7 We will break now and I shall return at 2.05.
 8 **(The witness withdrew)**
 9 **(1.02 pm)**
 10 **(The short adjournment)**
 11 **(2.05 pm)**
 12 **LADY HALLETT:** Mr O'Connor.
 13 **MR O'CONNOR:** My Lady, may we please call Dr Ben Warner.
 14 **DR BEN WARNER (affirmed)**
 15 **Questions from COUNSEL TO THE INQUIRY**
 16 **MR O'CONNOR:** Dr Warner, do take a seat. Could you give us
 17 your full name, please.
 18 **A.** Ben Warner.
 19 **Q.** Dr Warner, you have kindly prepared a statement at our
 20 request, which is up on screen, and it runs to some
 21 80 or so pages. I know that you've read it through
 22 before you became here today, and there are a couple of
 23 very small amendments that you want to make to it, which
 24 I'm not going to ask you about because they really are
 25 very minor indeed.

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1 but you refer in your witness statement to machine
 2 learning being one of the matters at least that you
 3 focused on at that stage?
 4 **A.** Yes.
 5 **Q.** You also say that in parallel, so at the time after 2015
 6 that you were working with your brother, you were also
 7 advising both government and also the commercial sector
 8 on data science, artificial intelligence, matters like
 9 that?
 10 **A.** As part of my work as an employee of Faculty, I advised
 11 government FTSE 100 companies and fast growth start-ups,
 12 as it says in my witness statement.
 13 **Q.** I see. So it was at that time but I was perhaps wrong
 14 to say it was in parallel --
 15 **A.** Yes.
 16 **Q.** -- it was part of your job?
 17 **A.** Yes.
 18 **Q.** Thank you.
 19 So moving forward a little bit in the chronology,
 20 then, you say that you were recruited to work at
 21 Number 10 immediately following the December 2019
 22 election?
 23 **A.** Yes.
 24 **Q.** Is it right that you were recruited by Dominic Cummings?
 25 **A.** The conversations I had with were Dominic Cummings, yes.

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1 With those amendments having been made, are you
 2 confident that the contents of this statement are true
 3 to the best of your knowledge and belief?
 4 **A.** Yes.
 5 **Q.** Thank you.
 6 Dr Warner, you are by training a scientist, are you
 7 not?
 8 **A.** Yes.
 9 **Q.** In fact, you describe in your witness statement that you
 10 took a PhD in molecular physics?
 11 **A.** Close enough, yes.
 12 **Q.** Thank you. And that having obtained that qualification,
 13 you undertook post doctoral research at engineering
 14 and -- at the Engineering and Physical Sciences Research
 15 Council?
 16 **A.** That's the title of the research fellow, the fellowship
 17 was at University College London.
 18 **Q.** Thank you. Thereafter, and we're on or about 2015 now,
 19 you worked for a data science company run by your
 20 brother, Marc Warner; is that right?
 21 **A.** Mark co-founded it with a number of other people, and he
 22 is the CO, yes.
 23 **Q.** And you work there?
 24 **A.** Yes.
 25 **Q.** We don't need to go into the detail of your work there,

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1 **Q.** And the purpose of your employment, the whole idea was
 2 that you would try to push forward the use of analysis
 3 and technology in government, drawing no doubt on the
 4 experience we've just mentioned?
 5 **A.** Yes.
 6 **Q.** It is right, isn't it, that you had worked on the
 7 Vote Leave campaign a year or so before the 2019 --
 8 **A.** Yes.
 9 **Q.** -- election? And is it right that you therefore knew
 10 Dominic Cummings from those days?
 11 **A.** Yes.
 12 **Q.** Presumably you also knew Boris Johnson as well?
 13 **A.** No.
 14 **Q.** Had you not come across him during the Vote Leave
 15 campaign?
 16 **A.** I believe I had never -- I had never spoken to
 17 Dominic -- sorry, to Boris Johnson during the Vote Leave
 18 campaign.
 19 **Q.** Right. And just to finish off on the start, as it were,
 20 of your experience in Downing Street, you describe in
 21 your statement that you were, as a matter of formality,
 22 a special adviser, but you emphasise that it wasn't your
 23 role to advise on political matters in the way that we
 24 might normally expect of a special adviser, indeed you
 25 say you had no expertise in the wider Westminster

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1 political ecosystem; is that right?

2 **A.** I mean, how I've described it in my witness statement is
3 probably the most precise I can be.

4 **Q.** Yes. Is that a fair summary that I have just given?

5 **A.** Yes.

6 **Q.** Tell us this: when you started your job, then, in
7 December 2019, how were you expecting it to develop,
8 what were you expecting to be engaged on during your
9 time at Downing Street?

10 **A.** I treated it like any other engagement that I've done
11 previously. Often companies that lack expertise in
12 these areas understandably don't know the best way to
13 move forward, so the first part was just to learn the
14 sort of state of the landscape at that point in time.

15 **Q.** Of course we're all conscious of the dates, and within
16 really a month or two of you arriving in Downing Street,
17 the pandemic began and a large amount of your time, not
18 all of it, as you explain in your statement, but a large
19 amount of your time was taken up with matters relating
20 to the pandemic, in summary?

21 **A.** Erm, I think that over the early period that is true but
22 towards the later period that would not be true.

23 **Q.** Yes. And just to be clear you in fact left
24 Downing Street in May of 2021?

25 **A.** Sorry, I was referring to the later period of my time in
109

1 12 February, was the first occasion when you, as it
2 were, had a formal involvement in the sense of
3 an appointment in your diary requiring you to undertake
4 something to do with the pandemic?

5 **A.** Yes, my calendar especially over that early period
6 probably is not a great reflection of my activities,
7 but, like you say, the first calendar that we can show
8 is definitely Covid is that Operation Nimbus exercise.

9 **Q.** As we'll hear, and we'll come to this in a bit more
10 detail, after that, so after 12 February, you started to
11 attend scientific committee meetings, for example SAGE,
12 but I think, as we'll hear, there may have been other
13 committees as well, and so the rhythm of your
14 involvement increased over that period?

15 **A.** Yes.

16 **Q.** Your statement describes, and this is really one of the
17 themes that I want to explore, how you became convinced
18 that the mitigation strategy which we've all heard about
19 and which was being pursued at the time was flawed in
20 the sense that, as the understanding of the pandemic
21 developed, you became convinced that it would lead to
22 an NHS -- to the NHS being overwhelmed, which would
23 itself cause, greatly increase fatalities; is that
24 right?

25 **A.** I became convinced the mitigation strategy was the
111

1 Number 10, not the later period of the pandemic.

2 **Q.** Yes. So it's right that you left Downing Street in
3 May 2021?

4 **A.** Yes.

5 **Q.** So just the point you made, the early period, you mean,
6 shall we say, the first half of 2020?

7 **A.** Yes.

8 **Q.** And then your involvement from later on in 2020 and
9 early 2021 was reduced?

10 **A.** Yes.

11 **Q.** Thank you.

12 Now, let's talk, then, about that period for the
13 first half of 2020. And just by way of context you
14 describe in your witness statement in the very
15 early weeks of the year being engaged in other projects.
16 Of course you probably -- well, I think you say you had
17 heard of the pandemic starting in China from the
18 scientific press, but it wasn't a matter of everyday
19 concern for you in early January. You refer,
20 for example, to working on the HS2 project during that
21 period?

22 **A.** Yes.

23 **Q.** But you did quite shortly thereafter become involved in
24 the day-to-day response to Covid-19, and it may have
25 been that Exercise Nimbus, which took place on
110

1 incorrect one, yes.

2 **Q.** Was that at least partly to do with the fact that it
3 would cause NHS overwhelm?

4 **A.** Yes.

5 **Q.** Thank you.

6 So, as I say, I'd like in a moment to review what
7 you were doing, what took place, the notes you made
8 during that period, with that being at least one of the
9 issues we focus on.

10 Before I do that, I wanted just to raise a couple of
11 short introductory points. The first, can we go to
12 paragraph 95 of your statement, please, on page 27.
13 It's the sentence or two at the beginning of that
14 paragraph, Dr Warner, you say:

15 "It is not necessary to perform large scale
16 simulations of an epidemic to understand the main
17 effects of a mitigation versus a suppression strategy.
18 Simple calculations law allow for reasonable
19 approximations of the outcome, and I would have been
20 carrying out calculations of this type."

21 Now, we've heard a lot of evidence, Dr Warner, about
22 modelling and we've heard about how complicated and, if
23 you like, inaccessible other than to experts those
24 modelling processes can be.

25 Are you trying to make the point here that one can
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- 1 understand in broad terms things like the difference
2 between the mitigation and the suppression policies,
3 strategies, without actually needing to undertake
4 complicated modelling?
- 5 **A.** Yes. I think, you know, the -- as discussed in my
6 statement, I'm really talking about reasonably simple
7 epidemiology.
- 8 **Q.** Yes. Just to give a sort of example of the point which
9 you may well be trying to make, can I ask you to look at
10 an email, please. Just to make this clear, this isn't
11 an email that you were party to at the time it was sent.
12 The Inquiry has already looked at it. It was an email
13 sent in January, on January 25, by
14 Professor Woolhouse --
- 15 **A.** Yes.
- 16 **Q.** -- who the Inquiry has heard from, to Neil Ferguson, who
17 I know you knew at around this time, and also
18 Sir Jeremy Farrar.
- 19 We see here that he is sharing some concerns that he
20 had at that early stage about Covid and asking himself
21 the question, "how bad is it going to get", and
22 referring to what he describes as "2 key numbers" which
23 he had seen in the WHO statement, that is R, the
24 reproduction number, yes?
- 25 **A.** Yeah.

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- 1 but the other two are true.
- 2 **Q.** Right. Thank you.
- 3 Let's move on, then, and look back at your own
4 personal involvement, and we can do that, if we may, by
5 going to paragraphs 32 and 33 of your witness statement,
6 to start with, on page 11.
- 7 We've touched on this, but you describe at -- it's
8 at 33 where you say that the first, as it were, diarised
9 event was this Nimbus exercise. In the paragraph above
10 you say that you very likely came across Covid in
11 meetings or discussions before that but you can't pin
12 that down now.
- 13 So Nimbus on 12 February, you refer to being
14 an observer there, and it was, as we have heard,
15 a ministerial tabletop exercise. Do you remember where
16 it took place?
- 17 **A.** In COBR.
- 18 **Q.** Right. As you say, the objective was to expose
19 ministers to decisions they might be expected to take
20 during a pandemic in the reasonable worst-case scenario.
- 21 Now, we've heard something about that concept of
22 a reasonable worst-case scenario. What did that term
23 mean to you or does it mean to you?
- 24 **A.** At this time or now?
- 25 **Q.** At the time.

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- 1 **Q.** Being 2. And the case fatality rate of 4%. He also
2 refers to a generation time which he said he could make
3 a guess at. And then he says, perhaps if we drop down
4 two paragraphs, he refers to some arithmetic which, as
5 puts it, his undergraduate class could work out with
6 a pocket calculator in a few minutes, and then the
7 paragraph above what that arithmetic is, he says:
8 "If we take those numbers at face value we quickly
9 get to a ballpark estimate of almost half the people in
10 the UK ... getting this infection over a year or so, at
11 least a double being of the gross mortality rate (much
12 more during epidemic peak), and a completely overwhelmed
13 health system."
14 Those, of course, were his ballpark calculations,
15 but is that the type of rough calculation that you had
16 in mind in that paragraph of your statement you were --
- 17 **A.** Yes, I'm almost certain he is referring to the same
18 equations that I'm talking about.
- 19 **Q.** Right.
- 20 **A.** Yes.
- 21 **Q.** So we can see there that those sorts of equations give
22 you, if you like, a ready reckoner on likely mortality
23 rates, the likely period an epidemic may last, or
24 a pandemic, and the impact on the NHS; is that fair?
- 25 **A.** I'm not sure how you get the timescale of the epidemic,

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- 1 **A.** At the time, I -- it's -- I -- it ... in this meeting,
2 actually, I can't tell you what I thought it meant.
- 3 **Q.** Well, let me put it this way: I'm sure you knew that
4 this was supposed to be a "reasonable worst-case
5 scenario", and that's in the slides and is -- we will
6 see was discussed at the meeting itself. So did you
7 understand that the scenario being discussed was
8 something that was predicted as likely to happen or as
9 something that might happen, perhaps the worst sort of
10 end of the spectrum, or do you not know?
- 11 **A.** I can't speak to that.
- 12 **Q.** All right.
- 13 Let us go, then, to some of the documents that are
14 associated with the Nimbus exercise, and to start with
15 perhaps we can look briefly -- because we did look at
16 this document at the end of last week -- at the briefing
17 pack, which is INQ00052022.
- 18 I'm sure you've looked at this document recently,
19 Dr Warner, but do you remember seeing it at the time?
- 20 **A.** Yes.
- 21 **Q.** Let's go, if we can, first of all, to page 7, where we
22 see what's described as the synopsis, and we will
23 note -- we did look at this at the end of last week --
24 first of all, the first bullet point, the notional date
25 was 14 April, so they were projecting it two months

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1 ahead, because we know that the exercise was actually on
2 12 February.

3 Then there were various details given about what is
4 supposed to have happened by then and what is forecast,
5 and we can see the penultimate bullet point:

6 "8,500 deaths to date ... however there is a lag in
7 data ... Case Fatality Rate ... of approximately 2.5% of
8 clinical cases (1.25% of the total population)."

9 And in terms of actual numbers, we see in the last
10 bullet point it's expected 840,000 excess deaths over
11 the 16-week wave of the infection, assuming -- there is
12 that term we discussed -- the reasonable worst-case
13 scenario.

14 Those of course are very high numbers indeed, aren't
15 they?

16 **A.** Yes.

17 **Q.** And they must have made an impression on you at the
18 time?

19 **A.** Erm, as I say, in my statement, most of the -- my
20 reaction is in hindsight. I mean, it was a fictional
21 exercise.

22 **Q.** A fictional exercise which was dealing with a very
23 extreme set of factual events.

24 **A.** I don't remember more than I put in my witness
25 statement.

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1 you exhibited to your statement, along with very many
2 others. I didn't raise it at the end of last week, and
3 suggested that we hadn't seen a document of this sort.
4 In fact it had been disclosed, and we did have it. So
5 let's look at it now.

6 First of all, could I just pick up on the timing,
7 Dr Warner. You may or may not remember much about this,
8 but it's quite noticeable that the exercise started
9 at -- can you see, that's right -- 16.45, so quarter to
10 5 in the afternoon? Do you have any memory as to how
11 long it lasted? If it started at that time, one might
12 think it wouldn't have lasted more than an hour or two,
13 but can you help us at all?

14 **A.** No. No.

15 **Q.** Let's look on, then, please. We see a list of
16 attendees, that Matt Hancock was in the chair.

17 If we go over the page, please, we can see your name
18 on the right-hand side; yes?

19 Then I'd just like to take you to one or two
20 references, starting on page 3, please, the first
21 numbered paragraph. We see that the exercise was
22 started with what's described as a "current situation"
23 update, and a little more detail is given about the
24 notional situation than we saw in the slides.

25 So, for example, we can see an estimate that there

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1 **Q.** Okay.

2 Let's just look over the page, the last page on this
3 document. This summarises the position in graph form
4 rather than in the bullet points on the page before. We
5 see, don't we, a fairly familiar type peak. Most of it
6 is projected because the April date when the exercise
7 was supposed to be taking place was still in, as it
8 were, the foothills of the development of the pandemic
9 on the scenario at Nimbus; is that fair?

10 **A.** Yes.

11 **Q.** We see the line. You say in your witness statement that
12 you knew this anyway, but looking at this peak, it's
13 clear that what is contemplated is some form of
14 mitigation strategy because you don't see any sense in
15 which the wave is being suppressed, if that is the
16 alternative strategy?

17 **A.** Yes, I do say that. It's important to recognise that
18 I do say that in hindsight; I don't remember what I was
19 thinking at the time.

20 **Q.** All right.

21 Let's go on, if we may, to another document which in
22 effect is a set of minutes from the exercise, although
23 I'm not sure one actually sees that term used in this
24 document.

25 Just to be clear, this is actually a document which

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1 could be as many as 1.6 million further cases in the
2 week on which the notional exercise was taking place.

3 If we go over the page, we see, just again to give
4 us a sense of scale of the type of emergency that was
5 being exercised, paragraph 3:

6 "DCMO emphasised that the week beginning 13th May
7 may be the peak week and 7.3 million new cases would
8 arise in that week, not including those who had not yet
9 recovered ... The expectation was that over the course
10 of the pandemic there would be 33.5 million clinical
11 cases."

12 So, as I say, putting some numbers to the broad
13 outlines in the slides.

14 Clearly, if you like, a population-level pandemic
15 was being contemplated; yes?

16 **A.** Yes.

17 **Q.** Then if we just look further down that page and on to
18 the next couple, we can see that the discussions seem
19 largely to have focused around how such an enormous
20 series of infections were to be dealt with by the
21 various different parts of the state that were
22 represented at the meeting, in particular the NHS.

23 So, for example, at paragraphs 7 and 8, we see being
24 picked up the point that was raised towards the end of
25 last week about the NHS needing to triage by resource,

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1 as it's put, so not having the capacity to triage or to
2 treat everyone that came through the door, needing to
3 use their resource only on some people.

4 Paragraph 11, reference to the fact that there would
5 be competition for beds between new patients and old
6 patients; do you see that?

7 Can I just ask you, do you have much of a memory at
8 this sort of discussion at the exercise, Dr Warner?

9 **A.** The first thing I'd say is that I don't -- these
10 minutes, I'm not sure I saw at the time. I think if
11 they were referenced in my witness statement, it was
12 a reference to show that I was there, rather than
13 because I have these notes.

14 My recollections of the exercise as a whole is
15 contained within my statement, that I remember thinking
16 that it was a serious -- obviously a massively serious
17 threat, and that I didn't think this stress tested the
18 government's plans in any serious way. Past that,
19 I don't have any extras.

20 **Q.** All right. Well, I'll just take you to one more
21 reference, in part so that my Lady can see it.

22 If we can look over two pages, please, to page 6 at
23 paragraph 28, continuing the theme, really, there's
24 a reference to the Home Office noting the "social
25 consequences of the decisions, effectively rendering it
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1 eyes over the types of lessons that are identified here,
2 looking on the column numbered 1, "Policy issues for
3 further discussion", we see, for example, three bullets
4 down:

5 "Mental health support for those involved in
6 strategic decision making of Covid-19 ...
7 "Consideration of possibility of public unrest ..."

8 If we zoom out we would see that there are other
9 similar considerations in the other columns,
10 for example, at the top of the send column, a need for
11 the Moral and Ethical Advisory Group to advise on the
12 types of decisions that might need to be taken.

13 The point I wanted to make about this, Dr Warner,
14 and ask you about is that there's plenty of
15 consideration of unrest and difficult decisions to be
16 taken, but there doesn't seem to be anything about the
17 fact that the NHS might be collapsing and trying to do
18 anything to stop the NHS collapsing.

19 Do you remember at all, either at the meeting or
20 afterwards, any discussion about the fact that what had
21 been discussed at the exercise seemed to be a series of
22 events involving the NHS collapsing?

23 **A.** I don't remember conversations in the room. As I put in
24 my statement, that I just remember it just being overall
25 not a serious attempt to stress test the government's
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1 into a 'survival of the fittest' situation".

2 What we certainly seem to see from these minutes,
3 Dr Warner, and I appreciate you're saying that this
4 isn't all in your memory now, but do you agree that, at
5 least looking at these minutes now, it is apparent that
6 what is being discussed is a disaster, a sort of medical
7 disaster which either, in fact, involves the NHS
8 collapsing or at least a situation which is very close
9 to the NHS collapsing?

10 **A.** Yes, in this hypothetical scenario everyone is
11 discussing that.

12 **Q.** Yes, I mean, if you're talking about fighting over beds
13 and survival of the fittest and so on, that's in true
14 where you are, isn't it?

15 **A.** Yes, in this hypothetical scenario.

16 **Q.** Hypothetical, absolutely.

17 May I direct you to another document, please, which
18 is document INQ000056150, which is a CRIP, and we've
19 been taken to page 14 of it, which is the page I wanted
20 to go to. These are the "Lessons Learned", or at least
21 some of the lessons learned from Exercise Nimbus.

22 Let me ask you this: did you see this document, do
23 you think, at the time, or --

24 **A.** No, I can't speak to it.

25 **Q.** No. Well, let me just show you it, and just casting our
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1 response.

2 **Q.** What do you think might have needed to take place if it
3 was going to be such a serious attempt?

4 **A.** I'm not an expert at war gaming so I don't think
5 I should speak to that.

6 **Q.** Well, in general terms, I mean, you say it wasn't
7 a serious attempt to stress test the arrangements, what
8 would you have wished to see or do you really not --

9 **A.** I think that you're -- it's not -- I'm not an expert in
10 crisis response, I don't know the right way to do
11 emergency planning or how to stress test these
12 responses. This is the only meeting of this type I've
13 ever sat in, therefore I can say to you my opinion at
14 the time but not necessarily the right way to do it.

15 **Q.** No, but your opinion at the time was that it wasn't
16 a very effective --

17 **A.** Yes.

18 **Q.** -- or deep exercise?

19 **A.** Yes.

20 **Q.** Let me switch back to this mitigation strategy that was
21 in force at the time and which -- and ask you about your
22 understanding of it.

23 In very broad terms, the purpose of or effect of the
24 mitigation strategy is, is this right, to allow the
25 virus to run through the population in order to acquire
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1 herd immunity? Right, okay so far?

2 **A.** Carry on.

3 **Q.** Well, let me carry on. Where the peak of the curve is
4 reduced so far as possible to mitigate the death toll
5 but not so much as to prevent the population acquiring
6 that herd immunity.

7 There's an extra element I want to add, which I know
8 appears in some of your documents rather later in the
9 chronology, and that is the need perhaps to prevent the
10 NHS being overwhelmed.

11 Did you understand back in February, at the time of
12 Operation Nimbus, that preventing the NHS being
13 overwhelmed was a critical part of the mitigation
14 strategy?

15 **A.** At this point in time, no, I did not think I did know
16 that.

17 **Q.** Do you think that -- applying a certain amount of
18 hindsight, do you think that in fact that was the policy
19 at the time or do you think perhaps it wasn't?

20 **A.** I don't know what the policy at the time was.

21 **Q.** Did it appear to you, at least from the Nimbus exercise,
22 that the need or a need to stop the NHS being
23 overwhelmed was in fact at the top of people's minds
24 during that exercise?

25 **A.** I think from the Operation Nimbus slides, you can
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1 You describe here, Dr Warner, that as you were
2 leaving COBR where the Exercise Nimbus had happened, you
3 had a conversation with Patrick Vallance in which you
4 suggested that you should start to attend SAGE meetings.
5 He thought it was a good idea, and thereafter you did
6 regularly attend SAGE meetings.

7 **A.** Yes.

8 **Q.** Why did you suggest that you should attend SAGE
9 meetings?

10 **A.** I thought that it was a good idea for me to have
11 a better scientific understanding of the pandemic.

12 **Q.** Did you feel at the time that you might be missing
13 something or did you just think, "This is now obviously
14 serious, this is somewhere where I can get more
15 involved"?

16 **A.** I think that it was about making sure that I had a clear
17 understanding of the current scientific evidence.

18 **Q.** So SAGE meetings you then attended regularly. I think
19 in fact the first one was the next day.

20 If we can look just to carry on with this theme at
21 paragraph 44, which is over on the next page, thank you,
22 we can see that you only a week or so after that started
23 attending COBR meetings as well.

24 **A.** Yes.

25 **Q.** You also refer to civil contingencies meetings
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1 clearly see that a mitigation strategy is the one that
2 the government is pursuing. Why it is pursuing that
3 I think is not in those slides, and I do not remember
4 further discussion on that.

5 **Q.** You see, one -- let me just ask for your reflection on
6 this. One explanation for the fact that, as far as we
7 can see, the exercise doesn't really seem to have
8 grappled with trying to stop the NHS being overwhelmed,
9 either in the minutes of the meeting or in the lessons
10 learned, may be that it was regarded as something that
11 was perhaps inevitable or at least it couldn't be
12 stopped and so there was no need to spend time worrying
13 about it. Do you think that might be an accurate
14 description of the view at the time?

15 **A.** I think that it's clear from those -- the numbers in
16 those graphs that are presented that in the reasonable
17 worst-case scenario the NHS would struggle, and
18 I believe that is actually in the Nimbus slides.

19 Whether people saw it as inevitable or not, I don't
20 know. At that time I'm not sure I would have formed
21 a view.

22 **Q.** No. Well, that's very fair, Doctor, and let's carry on
23 with the chronology, then, if we may.

24 Let's look at your witness statement first, and at
25 paragraph 39, please, on page 12.
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1 separately from COBR meetings. What were they?

2 **A.** I don't know.

3 **Q.** They may have been sort of occasional, ad hoc civil
4 contingencies meetings, perhaps?

5 **A.** I believe this might be a quote from the email.

6 **Q.** Right, I see.

7 Then, I'm not going to take you to passages in your
8 witness statement, but you -- is it right that you also
9 attended, first of all, SPI-M meetings?

10 **A.** I believe I did attend SPI-M meetings, but not to the
11 same frequency of SAGE.

12 **Q.** I see, and what about SPI-B meetings? You do refer in
13 your witness statement to having a meeting with SPI-B.
14 I'm not sure whether you meant that you were a regular
15 attendee of their meetings or not.

16 **A.** I believe I had a couple of conversations with
17 James Rubin. I don't think I ever attended SPI-B.

18 **Q.** All right.

19 But in any event, we -- it's fair, I think, to say
20 that from around this period you did start to attend
21 these series of meetings that we have just discussed,
22 certainly SAGE, COBR and some SPI-M meetings?

23 **A.** Yes, although I would -- I'm not sure about SPI-M before
24 the -- say March 23. My memories of SPI-M is post
25 lockdown.
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1 **Q.** Can we take it that your scientific training meant that
 2 you were able to engage with, understand the discussions
 3 at these meetings?
 4 **A.** Yes.
 5 **Q.** Were you welcome at them?
 6 **A.** Yes.
 7 **Q.** Did you act as a conduit between the scientists in these
 8 meetings and Number 10 and the people you worked with
 9 there?
 10 **A.** Erm ... it's fair to say that, you know, I discussed
 11 things with the scientists, but I was also aware that it
 12 was important that I did not speak for Patrick or Chris
 13 in their roles as CSA or CMO.
 14 **Q.** One of the sort of systemic issues that the Inquiry is
 15 looking at is how well the system of passing information
 16 and views from SAGE and the other committees on the one
 17 hand up to the decision-makers in Downing Street worked,
 18 and we know that a very key part of that was
 19 Chris Whitty and Patrick Vallance.
 20 So did you see yourself as being an extra means by
 21 which the information could pass from the committees up
 22 to Downing Street, or did you in fact make sure that
 23 that wasn't the case?
 24 **A.** Erm, I did not see myself as an extra means. Obviously
 25 by listening to SAGE and talking to scientists I had

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1 **Q.** Are you able to give us an example of that sort of
 2 concern or episode?
 3 **A.** The reason I speak to that is because I sent an email to
 4 that regard in -- just after lockdown, for specific
 5 instances, but no, I can't speak to it.
 6 **Q.** All right.
 7 Thank you, we may come back to that issue in due
 8 course, but let's take the chronology forward a little
 9 bit and go through towards the end of February. Now you
 10 are attending regular SAGE meetings, and it's right,
 11 isn't it, that the picture about how the virus was
 12 taking hold in the country was becoming clearer during
 13 this period, in particular it was that the view of SAGE
 14 that sustained community transmission was present was
 15 hardening during the latter half of February?
 16 **A.** I don't think that's true.
 17 **Q.** Tell us what --
 18 **A.** I think that 2 March SPI-M say it's likely and it's
 19 almost certain over the next two weeks, but I don't know
 20 if that's true over the mid to late February period.
 21 **Q.** All right, I think there was some -- I don't disagree
 22 with your -- what you say about early March, but I think
 23 there were some earlier references in February where
 24 less strong views were expressed on SPI-M.
 25 But be that as it may, the view, certainly the

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1 an informed view and I participated in conversations.
 2 **Q.** Did you feel at the time that there was in fact any
 3 sort of shortfall, or deficit, in the way that
 4 information was passing between the committee meetings
 5 up into Downing Street?
 6 **A.** Throughout the pandemic I thought that there was a lack
 7 of scientific capability within the different teams and
 8 groups that I was working with. And that --
 9 **Q.** Just pause there for a moment. Do you mean a lack of
 10 scientific capability on SAGE or in Downing Street?
 11 **A.** Oh, no, sorry, I meant for -- that was the -- generally
 12 across government. Obviously the people on SAGE are
 13 very good at what they do, they are very thoughtful
 14 scientists and, as I say in my report, I spent time
 15 talking to them to make sure I was as informed as
 16 possible as to their views.
 17 **Q.** Sorry, I interrupted you, you were saying that you did
 18 think there was a lack of scientific understanding in
 19 the government departments you were working in?
 20 **A.** In general. And also within the specific instance I do
 21 think that within the, you know, let's call it sort of
 22 COBR/Cabinet Office, that I was continually concerned
 23 about their understanding of what SAGE was saying and
 24 how that was being translated into the documents that
 25 were produced for ministers.

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1 picture was becoming clearer during February. Do you
 2 agree with that?
 3 **A.** I ... I think that ... I think that's a difficult
 4 statement to make without looking at the evidence.
 5 **Q.** Let me ask you a different question, which is this time
 6 not about the development of the pandemic, but about the
 7 question of the NHS and whether it was likely to be able
 8 to cope with whatever was coming down the line.
 9 Now, the evidence we've heard from a number of
 10 scientists on SAGE and also on SPI-M, as you know many
 11 of them doubled up, was that it was becoming clear
 12 during February that the NHS was likely to be
 13 overwhelmed at the peak of the pandemic. For example,
 14 Professor Medley used very much those words. He said:
 15 "Throughout February ... it became increasingly
 16 clear that NHS capacity in the UK would be overwhelmed."
 17 You were at the SAGE meetings, perhaps not the SPI-M
 18 meetings that early; is that something that you picked
 19 up from those meetings?
 20 **A.** Apologies, are you talking about the reasonable
 21 worst-case scenario or a central forecast?
 22 **Q.** A central forecast.
 23 **A.** I'm not sure there was a central forecast at this point.
 24 **Q.** No, well, that's rather the point. It may be that it
 25 wasn't set down as a central forecast, but it was the

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1 view that was being formed by the members of the
 2 committee. You were there, I wonder whether you picked
 3 that up in discussions at the time or not?
 4 **A.** I have no memory of that, I'm afraid.
 5 **Q.** Because one of the issues with both certainly SPI-M and
 6 SAGE is that the consensus statements that emerged and
 7 were then passed on to Downing Street and other
 8 government departments perhaps didn't capture the full
 9 depth of view being developed on those committees.
 10 Now, to take this as an example, this is something
 11 that we asked Professor Medley about, because we looked
 12 at the SPI-M and SAGE minutes and they didn't reveal the
 13 type of view that he was expressing about the NHS during
 14 February.
 15 Do you think, either in that instance or others,
 16 that the consensus statements, the minutes, didn't fully
 17 reflect the discussions being held?
 18 **A.** Erm, I ... I don't know if I was seeing the minutes at
 19 this point, and I also don't remember the minutes at
 20 this point.
 21 **Q.** Do you have any memory at all of a developing view about
 22 whether the NHS would be able to cope with the
 23 approaching pandemic during February?
 24 **A.** I remember discussions about the sort of developing
 25 evidence around the virus, about whether, you know --

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1 Dr Warner. I'm going to take you to a passage in these
 2 notes in a moment, but you have, I think -- you had
 3 a habit of keeping a notebook with you when you were at
 4 meetings, and you obviously kept them, and in preparing
 5 your statement you have gone back to them and done the
 6 best you can, because we don't always see dates on the
 7 pages, to identify which notes refer to which meetings.
 8 Is that right?
 9 **A.** Yes.
 10 **Q.** So if we can go to page 17, please, you say in your
 11 statement that, having done that exercise, you think
 12 these are the notes that relate to this meeting on
 13 the 27th that we were just discussing.
 14 **A.** Yes.
 15 **Q.** First of all, at the top of the page, we see:
 16 "Case fatality 2%"
 17 "Infection rate ..."
 18 Do you mean the infection fatality rate there,
 19 of 1%?
 20 **A.** I don't know. I mean --
 21 **Q.** That is --
 22 **A.** -- that's my note.
 23 **Q.** Or it's the overall fatality rate of 1% which you have
 24 referred to in your witness statement.
 25 In any event, just looking a couple of lines down,

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1 obviously case fatality rate is not the number that
 2 matters, right, it's the infections fatality rate, and
 3 that is a hard number to estimate, and I remember people
 4 talking about that, talking about the fact that actually
 5 it was like there was asymptomatic transmission.
 6 I think that a large number of these numbers, once,
 7 as you pointed out at the start, put into these simple
 8 equations, inferred that the NHS would be overwhelmed,
 9 but I do not think I ever saw a central forecast at this
 10 time.
 11 **Q.** Well, it's very much that sort of soft inference rather
 12 than a hard-edged forecast that I want to ask you about,
 13 Dr Warner.
 14 Let me take you to a few of your documents relating
 15 to this period. We can actually start by going to
 16 paragraph 52 of your statement. Yes, we have it there.
 17 You refer at the bottom of the page to a SAGE meeting on
 18 27 February. Do you see that?
 19 **A.** Yes.
 20 **Q.** And you refer there to the planning assumptions: in the
 21 reasonable worst-case scenario 80% of the UK population
 22 become infected with an overall 1% fatality rate.
 23 Now, your notes of this meeting you have provided,
 24 and perhaps we can look at those, it's INQ000215664,
 25 please. Perhaps we could just introduce these,

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1 can you see the reference to "80% infection" and
 2 "40% symptoms"?
 3 **A.** Yes.
 4 **Q.** Does that suggest a discussion about asymptomatic
 5 infection at that point?
 6 **A.** Looking at that, I think that this is a discussion of
 7 the reasonable worst-case scenario.
 8 **Q.** Yes. But help us, is the distinction between a certain
 9 proportion with infection --
 10 **A.** Sorry.
 11 **Q.** -- and a lower proportion with symptoms, does that
 12 suggest there was a discussion about asymptomatic --
 13 **A.** Apologies, what I meant by that was that it's likely
 14 that the document that's being talked about at that time
 15 will refer to this, so rather than going to my notes,
 16 you -- I would say -- suggest that that document will
 17 give you actually what it was. But yes, I agree with
 18 that, that this is saying that probably half the people
 19 infected show symptoms and the other half are
 20 asymptomatic, yes.
 21 **Q.** Yes. Well, obviously one of the things the Inquiry is
 22 interested in is how early on in the chronology of all
 23 of this asymptomatic transmission was being taken
 24 seriously. Help us, is this something that you think
 25 was discussed as something that was likely to be

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- 1 happening or something that only might be happening?
- 2 **A.** I can't speak, you know, that clearly, but I believe
- 3 that the asymptomatic transmission was always part of
- 4 the conversations of Covid. However, obviously,
- 5 you know, human memory as it is, but this definitely
- 6 points to that as well.
- 7 **Q.** Right, thank you.
- 8 Then just lastly on this page, let's just look
- 9 towards the bottom. Yes. So we see in square brackets
- 10 there "NHS fucked in any scenario"; do you see that?
- 11 **A.** Yes.
- 12 **Q.** And I'll ask you about that, but before I do, can we go
- 13 over the page, because there is one other reference
- 14 which may be driving at the same thing or it may not be.
- 15 Do you see four lines down it says "long peak over
- 16 health capacity"?
- 17 **A.** Yes.
- 18 **Q.** Help us, it would seem at any rate that both of those
- 19 references perhaps are to concerns about the NHS being
- 20 overwhelmed?
- 21 **A.** I believe that it says this in the reasonable worst-case
- 22 scenario document that SAGE is discussing, they say that
- 23 in these reasonable worst-case scenarios the NHS is
- 24 overwhelmed.
- 25 **Q.** Yes.

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- 1 Then four lines down you say:
- 2 "The bracketed statement about the NHS likely means
- 3 that in any scenario ..."
- 4 And I think what you've explained today, you mean,
- 5 as it were, in any of the worst-case scenarios that were
- 6 under discussion.
- 7 "... the NHS will be under extreme stress."
- 8 Is that what you mean?
- 9 **A.** Obviously in my notes it says "any". Today I've given
- 10 my best guess as to what "any" likely means, and yes,
- 11 that's what I mean.
- 12 **Q.** You had an exchange, it may even have been on the same
- 13 day, it was on the same day, could we have a look --
- 14 yes, it's been brought up, thank you.
- 15 If we look at the bottom first, this is an exchange
- 16 of emails with Patrick Vallance after the meeting that
- 17 we've just discussed. You say:
- 18 "In the SAGE meeting today, I was a little concerned
- 19 the NHS didn't seem to know what they needed for their
- 20 models, and didn't seem to have started modelling.
- 21 "Did you have the same feeling?"
- 22 And if we go out and look at the response,
- 23 Patrick Vallance responds almost immediately:
- 24 "Yes I have been pushing them on this for the last
- 25 10 days or so. I think Steve Powis [who is a senior

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- 1 Perhaps we can go back to the previous page. Your
- 2 note talks about the "NHS [being] fucked in any
- 3 scenario". Is there any significance in the word "any"?
- 4 Are you --
- 5 **A.** I believe that's probably -- and I would suggest that
- 6 the document that SAGE is discussing is the way to
- 7 investigate this, but what I would suggest is that it is
- 8 likely that, as we've seen multiple times, the graph is
- 9 drawn with an unmitigated peak, a mitigated peak, and
- 10 maybe multiple mitigated peaks depending on the
- 11 interventions that were brought in at that time. All of
- 12 those are likely over the top for the reasonable
- 13 worst-case scenario.
- 14 **Q.** So it's the various sort of modelled or proposed peaks
- 15 that are the "any" in that --
- 16 **A.** I mean, I am guessing, given the -- what's in my witness
- 17 statement, what's in my notes, but that does look to be
- 18 the obvious conclusion.
- 19 **Q.** Let's look back just for completeness, Dr Warner, at
- 20 paragraph 56 of your witness statement, because you
- 21 explain what you think you mean about these notes there.
- 22 So it's on page 17 of your witness statement,
- 23 paragraph 56. Thank you.
- 24 You fairly say you have no independent memory of the
- 25 conversation at the meeting.

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- 1 member of the NHS in England] has now grasped it ..."
- 2 It says that they have:
- 3 "... been doing a lot of modelling ... but the
- 4 problem is that they haven't defined the input
- 5 availabilities well enough ..."
- 6 But he thinks it's on track.
- 7 Looking at this exchange, and indeed at the meeting,
- 8 Dr Warner, so we're now over two weeks after
- 9 Exercise Nimbus, and the modelling is still in its early
- 10 stages, variables haven't been agreed, it might be
- 11 thought that not enough was being done to grapple this
- 12 rather obvious problem of the risk of the NHS being
- 13 overwhelmed.
- 14 I'm not criticising you, but help us, you were there
- 15 at the time. Clearly from your email you're suggesting
- 16 that they need to get on with it. Did you in fact
- 17 think: why haven't they done this already?
- 18 **A.** I -- my memory of these meetings is not complete enough.
- 19 I think that that email clearly shows that I'm concerned
- 20 about the NHS's modelling and whether we have a full
- 21 picture of what will occur in the NHS at that time.
- 22 **Q.** Let's move forward a week or so, Dr Warner. Let's look
- 23 at paragraph 87 of your witness statement on page 25.
- 24 You've transcribed the notes that you made at that
- 25 meeting, so we don't need to go to them, but here this

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1 is -- I think it was a Sunday, 8 March, the Sunday
 2 before the rather eventful week that followed.
 3 **A.** Yes.
 4 **Q.** So you're attending a meeting on a Sunday, which perhaps
 5 demonstrates how urgent matters were. Picking up again
 6 on this point about the NHS overwhelm, you say on that
 7 occasion:
 8 "Still case NHS supply always ... overwhelmed."
 9 Then in the paragraph below, you say:
 10 "I was making the point that in any documents that
 11 decision-makers were considering, it had to be clear
 12 that in a variety of scenarios being considered the NHS
 13 would always be overwhelmed."
 14 So has something changed, Dr Warner, by this stage?
 15 Is it still the question of, well, it's a worst-case
 16 scenario, it's one of a few worst-case scenarios? Or is
 17 the position now, in your mind at least, this is
 18 something that's actually going to happen?
 19 **A.** Erm, it's ... it's difficult to say precisely because
 20 we're moving through a time when there is developing
 21 scientific evidence and people's opinions are increasing
 22 in confidence about what the likely, let's say their
 23 central forecast is for each of these different groups.
 24 Obviously at this point I'm becoming increasingly
 25 concerned, and so I think what I'm trying to say here is

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1 **Q.** Let me take you to another document, Doctor, and this
 2 involves going forward to the end of that week.
 3 So it's INQ000196052, please.
 4 Now, this is a document you drafted. It's not dated
 5 but you do refer to it in your statement as a document
 6 that you started drafting on that Friday the 13th.
 7 **A.** Just to flag, this is a draft from part of that
 8 document. There is another -- the same document, which
 9 is the final -- a later draft that's also in there.
 10 **Q.** But is it right that this is your thinking on the Friday
 11 the 13th?
 12 **A.** I would suggest the later document is probably better,
 13 but I'm also happy to use this document, yes.
 14 **Q.** All right. Well, we've got this one on screen and if
 15 you tell us there's an important difference --
 16 **A.** The summary is different because it contains the fact
 17 that herd immunity is going to collapse the NHS.
 18 **Q.** Well, let me ask you just about two paragraphs that are
 19 in front of us, and you can tell us whether they
 20 remained in the final version and explain if they
 21 changed.
 22 Starting at the top, you refer to the fact that the
 23 government had chosen to follow a mitigate strategy:
 24 "This means that we are aiming to build
 25 herd immunity by late autumn."

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1 that in the documents that are going to decision-makers
 2 there is usually some sort of reference to it, but that
 3 unless you sort of draw attention to it, that this will
 4 clearly happen, it is, you know, that -- and it is --
 5 and that's what I'm trying to say here, is that in the
 6 variety of scenarios being considered, I believe this is
 7 still reasonable worst-case scenario, it is very clear
 8 to the decision-makers that in these scenarios the NHS
 9 will be overwhelmed.
 10 **Q.** By this time, certainly according to Professor Medley,
 11 it was a common understanding, he says his
 12 understanding, and he said that it was shared with
 13 a number of other people on his committee, that the NHS
 14 would not as a matter of worst case but a matter of
 15 likelihood be overwhelmed. Had you picked that up by
 16 this stage, or were you ...?
 17 **A.** I think at this point, I'm -- you know, we --
 18 I obviously had developing concerns. I believe that
 19 our -- across a range of issues. The issues about "is
 20 mitigation the right strategy" is one of them, for
 21 obvious reasons, though the actual uncertainty around
 22 the IFR, even at this point -- sorry, the infection
 23 fatality rate -- even at this point I don't think is --
 24 I think the estimates were probably between 0.25%
 25 and 1%, on around about this date.

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1 And then you go on:
 2 "The consequence of this is that we are not
 3 completely locking down our population to stop the
 4 epidemic, but are simply trying to reduce the effect of
 5 the pandemic to a level that the NHS can cope with."
 6 If we look down, we've actually got enough on
 7 screen, you refer a couple of paragraphs down to the
 8 alternative plan, the suppression model, and then two
 9 paragraphs below that, you come back to the theme which
 10 is that for this plan to work, that's the mitigation
 11 plan, it's crucial that the NHS does not collapse.
 12 So at least on this draft of this document in that
 13 week, it's clear that you understood that the idea of
 14 preventing the NHS from collapsing was an integral part
 15 of the mitigation strategy.
 16 So I wanted to come back, with this in mind, to the
 17 question I asked you earlier: is that a view you had
 18 sort of developed or formed by 13 March? Or was it
 19 actually always your understanding that preventing the
 20 NHS collapsing, lowering the peak to a level below NHS
 21 capacity, was always part of the mitigation strategy?
 22 **A.** I believe at this point we've published the action plan
 23 where I think it likely talks about this, but I can't
 24 say with certainty. And also there was obviously,
 25 I believe, a press conference where it was discussed.

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1 **Q.** Well, I'm not going to get -- the action plan doesn't
2 certainly refer to this in terms. But, you see, one
3 possibility -- we can all see that as a matter of
4 political reality it's simply not politically feasible
5 to have a response to the pandemic which involves the
6 NHS collapsing.

7 Do you think it's possible that over time, and that
8 by 13 March, that sort of political reality had had to
9 be factored in to the mitigation scheme, even if perhaps
10 it wasn't understood several weeks earlier?

11 **A.** I think your political feasibility I can't speak to, but
12 it is worth thinking about -- considering the fact that
13 there might be viruses in the future that have
14 a reproduction number that is high enough that you can't
15 suppress it in the way that we did, that actually
16 a lockdown would fail. So that is, I think, something
17 to recognise, that this isn't just about politics,
18 there's actually, you know, real world events that
19 change how you have to react to a virus.

20 As to this document, as to whether the NHS collapses
21 or not, obviously at this point I see it as crucial.
22 Obviously at this point I understand that if the NHS
23 does collapse, that brings with it, you know, people die
24 who did not need to die.

25 **Q.** Just following on from that, first of all, bearing in
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1 **MR O'CONNOR:** Just a few final questions, Dr Warner, on this
2 theme. We have got to 13 March, which we've heard from
3 many other witnesses was a key moment.

4 Can we look, please, at paragraph 122 of your
5 statement, which is on page 35.

6 This is your summary, Dr Warner, of where you think,
7 in your mind, things had reached on 13 March.

8 First of all, you say:

9 "... the epidemic was further along (that is, there
10 were more infections and numbers growing faster) than
11 had been anticipated ..."

12 That was a development that took place at the SAGE
13 meeting on 13 March, a revised estimate from the
14 modellers, wasn't it?

15 **A.** Yes, I believe that they felt that the doubling time was
16 no long -- was not six days but three days.

17 **Q.** Then this:

18 "... the capacity of the NHS was not going to be
19 close to sufficient ..."

20 So here at least you're no longer -- correct me if
21 I'm wrong -- talking about a worst-case scenario, you're
22 talking about a likelihood, a probability of what was or
23 wasn't going to happen?

24 **A.** Yes, I'm discussing the forecast of how the disease
25 will -- how the pandemic will proceed, not a planning
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1 mind what you say about this being a draft, and there's
2 a later version, was this a document you drafted for
3 yourself or for other people to see?

4 **A.** This I believe is something that I began drafting with
5 the idea of trying to persuade others that our current
6 strategy was not the right one.

7 **Q.** And did a further draft of this document go,
8 for example, to the Prime Minister?

9 **A.** In my witness statement I talk about the document
10 I drafted. I also discuss another document that was
11 drafted on the Saturday, which I think is clearer and
12 talks to the same views, that was -- I think we had the
13 intention of sending more widely.

14 However, on August 15th obviously Neil Ferguson sent
15 through a paper which more rigorously says exactly the
16 same points. Also Angela McLean sends a paper to SAGE
17 that says similar points. So we didn't actually need to
18 rely on my not brilliant English and communication, or
19 the other documents. We could rely on the scientific
20 advisers' documentation to provide the evidence as to
21 why we needed to change strategy.

22 **Q.** Just --

23 **LADY HALLETT:** You said August 15th?

24 **A.** Sorry if -- I have misspoken, I meant March 15th,
25 thank you.
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1 assumption.

2 **Q.** And are you able to help us with how much before that
3 date this view of yours had hardened into a view about
4 actuality rather than a worst-case scenario?

5 **A.** On 8 March we are -- we can clearly see the increasing
6 concerns around mitigation. Not only, you know, is the
7 overall plan for mitigation a good one, like, the
8 correct one, but actually the state of that plan as
9 well.

10 We -- throughout that week, I was of the opinion we
11 should move faster, even in -- within let's call it
12 an envelope of the mitigation strategy. That view
13 hardened -- we can see that I start writing that
14 document basically saying we should change the strategy.
15 Then you go to the SAGE meeting on 13 March, where
16 discussions occurred which leads me to what I've written
17 here, that lots of people including members of SAGE did
18 not think that the mitigation strategy was necessarily
19 the right one.

20 **Q.** Yes. And that's the third point you make?

21 **A.** Yes.

22 **Q.** We've heard from other witnesses about the meetings that
23 then took place over the weekend, on the Saturday and
24 Sunday, and may I ask you, for now at least, some fairly
25 high-level questions about that?
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1 A. Of course.

2 Q. First of all, by the end of the weekend, at least, was
3 it right that a decision had been reached to change from
4 a mitigation to a suppression strategy?

5 A. My memory of the Sunday the 15th meetings is I don't
6 have a clear memory -- a memory. I remember from
7 the 14th there was, it felt to me, a prevailing view
8 that we did have to move forward with the suppression
9 strategy. However, you know, obviously it needed to be
10 discussed with Patrick and Chris. But -- and then --
11 but I can't -- I'm afraid I can't tell you with the
12 certainty that I would like to be able to.

13 Q. Well, it may be that my next question then will get much
14 the same answer, but we've heard slightly different
15 evidence from people who were there about whether
16 decisions in principle were taken at around that time
17 about a lockdown or not. One thing is clear, no actual
18 decision to impose a lockdown was taken then.

19 We know that was some time later. But at least one
20 witness, Lee Cain, said that he understood that in
21 principle a decision had been reached over that weekend
22 that there would have to be what we know as a lockdown.
23 Others have made the point that that probably wasn't
24 a word that was being used then, but we know what it
25 means.

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1 than I've done.

2 Q. No, you have been very helpful, Dr Warner.

3 Let me ask you, please, about a document around this
4 time, although it was a WhatsApp message between
5 Mr Cummings and Mr Johnson.

6 If we could go, please, to INQ000048313. Thank you,
7 you're ahead of me.

8 So there's a message from Mr Cummings on the
9 right-hand side to Boris Johnson where he says:

10 "... the main problem is not them [and he is
11 referring to Chris Whitty and Patrick Vallance] -- they
12 and SAGE are doing a great job on the science/models,
13 the Warners have interrogated [one of which is you] --
14 the problem is [Cabinet Office] and DHSC haven't
15 listened and absorbed what the models truly mean."

16 Then this:

17 "And timing wise you have been told a bunch of stuff
18 based on 'time to peak' but not 'time to NHS collapse'
19 which is an extremely critical difference!!"

20 Now, we can see that -- actually I should have said
21 this is dated the 14th, so it's the Saturday.

22 Do you agree with that sentiment, Dr Warner, that in
23 the period before that Saturday, that weekend, there had
24 been inadequate attention on the question of whether,
25 and if so when, the NHS was going to collapse?

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1 But other witnesses, including Mr Glassborow this
2 morning, have said, no, there were certainly decisions
3 over that weekend about the range of more intrusive NPIs
4 that were announced early in the week that followed, but
5 not really any even decision in principle about
6 a lockdown over that weekend.

7 Can you help us with that?

8 A. I think that it ... I think my impression was that it
9 was clear that we were going to have to change the
10 strategy, that we were going to have to move to
11 a suppression strategy. From memory on the 15th that
12 was also -- and, like I say, my memory of the 15th is
13 very unclear as to -- but I do think that the -- my
14 memory was that that was also the impression.

15 As to the exact measures, and what we now term as
16 a lockdown, what was actually implemented, no, I believe
17 that that level of specificity wasn't discussed.

18 I mean, you can see that in some of the pictures that
19 are taken of the whiteboard, that, you know, those
20 options are actually the things that ended up
21 developing, so that we were discussing things on
22 the 13th and 14th that then, you know, became what --
23 you know, lockdown.

24 But I understand that, you know, this is
25 an important question. I'm afraid I can't answer more

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1 A. I agree with that entire message.

2 Q. In fact we see that Mr Cummings sort of amplified --
3 emphasised it in the message below, he says that's "what
4 the Warners have been screaming" at him. Was that
5 metaphorically screaming, Dr Warner, or actually
6 screaming?

7 A. Metaphorical.

8 Q. Let me finally, then, just in a couple of minutes, ask
9 you some more general questions, and then perhaps it
10 will be a good moment to take a break.

11 I just want to ask you, as I say, some more general
12 questions about the period up to that weekend.

13 First of all, can we look at paragraph 303 of your
14 statement, please, on page 78.

15 As we have observed, one thing we can say about the
16 period running up to this weekend is that throughout end
17 of January but certainly February and the first part of
18 March, the policy was one of mitigation, and really that
19 was what everyone was thinking about.

20 At paragraph 303, the last two or three lines, you
21 say:

22 "From early 2020, we should have developed
23 alternative plans (for example lockdowns), after seeing
24 the actions in China or at least after northern Italy."

25 So is your point, your recollection, Dr Warner, that

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1 there was, if you like, too narrow thinking during that
 2 early period or too much weight was placed on one
 3 strategy? What are you trying to get at here?
 4 **A.** I think what I'm trying to say here is that for some
 5 diseases we will want to use a mitigation strategy, for
 6 some diseases, like HIV, we use a suppression strategy.
 7 I think once we saw that other countries were
 8 implementing a suppression strategy, even if we felt
 9 that mitigation was currently the right choice for the
 10 UK, we should have started working up plans around
 11 suppression.
 12 **Q.** Why?
 13 **A.** I think that the answer is that -- well, actually,
 14 sorry, I can answer that more correctly. In
 15 a mitigation strategy, as we've seen, the problems that
 16 you have are really around horribly excess deaths,
 17 et cetera. However, in a suppression strategy, you need
 18 to bring in methods of control, so test and trace,
 19 testing. These things require time to start up, they
 20 require time to build. The capacity of the state --
 21 obviously once we've failed to contain, we know that
 22 those -- the systems we have in place cannot -- will not
 23 be able to do it for when the virus is higher.
 24 Therefore for suppression you do need to have plans of
 25 how you're going to increase your testing, how you're

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1 witness statement, I tried to suggest that we should
 2 bring in similar consensus statements around other
 3 things, like how people are behaving, what are done in
 4 lockdown. Because actually I think the idea of taking
 5 very complex sets of data, very uncertain data, and
 6 bringing it together so that a person can have
 7 an informed view over one or two pages is actually
 8 a hard task and it's important, and I think that that
 9 idea of making sure that people have two, three pages of
 10 insight rather than data is actually important. If we
 11 were just feeding people the data that SPI-M were
 12 seeing, I mean, I'm not going to be able to understand
 13 that.
 14 So I think that to say that -- that the consensus
 15 statement is the error, because actually they are
 16 sort of showing people what is going to occur. I think
 17 that the interface into COBR, into DHSC, how that was
 18 interpreted, I cannot speak to. But I think this idea
 19 that SAGE is now -- either actually that is speaking to
 20 the SPI-M statements on the SAGE minutes, how they flow
 21 into the system, what is the right way to transfer
 22 complex scientific opinion into departments so they
 23 fully understand, my personal opinion is the way you do
 24 that is high bandwidth conversations between experts.
 25 You'll see throughout my witness statement I'm always

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1 going to have increased test and trace, how you're going
 2 to do many of the other things that we found we had to
 3 do in Covid to suppress the virus and stop it spreading
 4 throughout our society.
 5 **Q.** Thank you. So that's the sort of practical reason why
 6 one needs to think about a suppression strategy early.
 7 I wasn't very clear, but what I had in mind in
 8 asking you about why you need to think earlier is that
 9 one of the criticisms that has been suggested of the
 10 SAGE system is that it depends on providing these
 11 consensus statements, whereby it is, as it were,
 12 a summary of everything that people don't disagree on,
 13 and the suggestion has been made that one consequence of
 14 that system is that one doesn't find in SAGE documents,
 15 certainly the statements, a variety of options, and so
 16 one doesn't, for example, see, well, a group of people
 17 think this, a group of people think that, and yet
 18 another group thinks you should be thinking of something
 19 even different again.
 20 Do you think that it was that requirement always to
 21 find consensus on something that perhaps led to the
 22 suppression strategy being left out of account in those
 23 early months?
 24 **A.** I think -- I do worry we're reading too much into the
 25 idea of consensus statement there. As you see in my

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1 worried about the lack of epidemiology in government.
 2 I sent an email to Simon Case saying the first thing
 3 I'd do -- when he became perm sec, then the first
 4 thing --
 5 **Q.** Just slow down a little bit.
 6 **A.** Apologies.
 7 The first thing I would do would be to ask
 8 Angela McLean to join, because of the fact that actually
 9 high bandwidth communication between experts is how you
 10 confer that uncertainty, how you confer that
 11 disparate ... so I think it's almost -- it's, weirdly,
 12 in discussing how maybe the -- by moving to SAGE
 13 statements the bandwidth compression leads to a not full
 14 information. I'm worried in that simple statement we're
 15 doing the same thing.
 16 **Q.** I just want to take you back, though, to this paragraph.
 17 You are quite clear that -- in the view that more should
 18 have been done to think about a suppression strategy
 19 earlier than in fact was the case. I asked you whether
 20 you thought that one explanation for that not happening
 21 was the consensus system, if I can put it that way, and
 22 I think you've said no, you don't think that's the
 23 problem. Are you able to identify what went wrong in
 24 the fact that the suppression strategy wasn't considered
 25 as early as you think it should have been?

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1 **A.** I think it -- we can all look at, you don't need, as we
2 talked about earlier, complex models to look at the
3 activities China was taking or the activities that were
4 going on in northern Italy and think that we should have
5 alternative plans. That's the statement I'm making. As
6 to where those plans should have been constructed, who
7 should have made the decision to construct those
8 statements, I'm afraid I'm not the right person to ask
9 for that type of thing.

10 **Q.** Okay.

11 One last question perhaps before we have a break,
12 Dr Warner, then, and it goes back to the question on
13 reflection of consideration of NHS capacity.

14 We saw in that WhatsApp that Dominic Cummings was
15 saying that, if you like, Boris Johnson had been given
16 the wrong aiming point or at least hadn't been given
17 a set -- that important aiming point of time to NHS
18 collapse. I've taken you through the chronology,
19 admittedly fairly swiftly, of your understanding of the
20 position vis-à-vis the NHS, including the starting point
21 of Exercise Nimbus. Do you think that more
22 consideration should have been given to the whole
23 question of NHS capacity during that period, and if so,
24 by whom?

25 **A.** I think that there is a clear difference between

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1 really throughout -- well, certainly for the early part
2 of the pandemic, certainly in this period, they said
3 that they didn't really have a proper understanding of
4 what the government's policies and priorities were,
5 which made it difficult for them to do their work, their
6 modelling and so on.

7 Do you think it's possible that they didn't realise
8 in this early period that the overwhelming of the NHS
9 would be unacceptable to the government and that that is
10 perhaps one reason why more wasn't said about this on
11 the SAGE side earlier?

12 **A.** I think we have to be careful drawing inferences on
13 where mistakes occurred, because of the fact that
14 I don't think I have any evidence.

15 I do think that SAGE did understand. Whether that
16 was translated into the government plans, and the
17 government plans updated given what SAGE was saying,
18 I think is an important question, and I'm - but I'm not
19 sure I have that much to add to it beyond what I've put
20 in my witness statement.

21 **Q.** Just to be clear, then, are you saying -- and we're not
22 asking you to say things that you don't know or draw
23 inferences that you're not comfortable with, but you
24 were there and we weren't -- are you saying that from
25 the time you started attending SAGE, which was the

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1 a reasonable worst-case scenario and a forecast. How
2 that forecast was made, who is in charge of what is the
3 right plan, I think is an important question and one of
4 the reasons why I think the Inquiry is so important.

5 As to the consideration of the NHS ... I think that
6 the -- that it is correct that many reasonable forecasts
7 from at least, let's say, March 8, where I talked about
8 an IFR of 0.25, 0.5, 1, all of those numbers roughly
9 come down to the idea of an NHS that is almost certainly
10 overwhelmed, even if not overwhelmed under incredible
11 stress, and I think at that point it's clear to everyone
12 that more thought and at least -- at the very least, as
13 Angela McLean talked to me, you know, she said to me,
14 "Do you know that -- do you think that senior
15 decision-makers know what this strategy is saying?"

16 I remember that because she used the phrase,
17 you know, the "only way out is through", as in once
18 you're in a mitigation path, you have to stick to the
19 path.

20 And I think that even from March 8 I do not think
21 that that was given the consideration it deserved.

22 **Q.** That leads to what I promise really will be my last
23 question, Dr Warner, and it's this: another of the
24 themes of the evidence we've heard from those scientists
25 who were sitting on SPI-M and SAGE is that I think

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1 middle of February, it was commonly understood that the
2 NHS being overwhelmed would simply be a red line and
3 couldn't be allowed to happen?

4 **A.** No, I don't think that -- no. I think that ... I don't
5 know if the government's plan had specificity of that
6 type at that point. So whether SAGE wasn't aware of it
7 or whether that specificity did not exist I cannot speak
8 to.

9 **Q.** All right.

10 **LADY HALLETT:** I think you've had enough final questions,
11 Mr O'Connor.

12 **MR O'CONNOR:** I was not proposing to ask even a single one,
13 except perhaps, as my final question, my Lady, may we
14 have --

15 **LADY HALLETT:** I'm sorry we have to break, but I think it's
16 for everybody's benefit, but we will finish your
17 evidence this afternoon, I promise, Dr Warner.
18 3.40, please.

19 (3.27 pm)

(A short break)

20 (3.40 pm)

21 **LADY HALLETT:** Mr O'Connor.

22 **MR O'CONNOR:** Dr Warner, I'm going to move on, on the
23 chronology, to the summer and autumn of 2020, but the
24 theme at least picks up on something we were discussing
25

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1 before the break, which is the evidence that we heard
2 from some of the SAGE scientists, at least, that they
3 found there to be a lack of government policy that they
4 could sort of receive and understand and use as
5 a baseline for their advice, modelling and so on.

6 It may be that what we see in your statement is
7 a wish that there had been perhaps more of that sort of
8 carefully thought through strategy, starting perhaps at
9 this sort of time, this period around the middle
10 of 2020.

11 If we could look at paragraph 304, please, on
12 page 78, I'm going to pick up on the second sentence,
13 you say:

14 "Throughout the Covid-19 response, not enough
15 resources were devoted to alternative plans and measures
16 that strategically reacted to potential developments in
17 Covid-19. Government's 'just-in-time' policy making
18 exposed the lack of expertise within teams, as the speed
19 meant that it was difficult to pull in the appropriate
20 expertise from outside, and this speed also forced
21 a reliance ... on visualisations of data, rather than
22 rigorous quantitative analysis."

23 Then in the next paragraph, you say that the
24 decisions on the second and third lockdowns you think
25 were correct at the time they were made, as it were, but

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1 developments, and that would have allowed us to meet the
2 challenges of winter with a more robust strategy, have
3 plans in the locker, as it were, as to what happens,
4 rather than having to react and trying to come up with,
5 as I say, sort of policy just in time.

6 **Q.** Yes. You do pick up again on this idea of planning at
7 another section of your statement that I'd like to take
8 you through, and that's paragraph 164.

9 You may recall, Dr Warner, this is the passage where
10 you refer to the two sort of opposite ends of the
11 spectrum, in a way, the "running hot" policy of allowing
12 infections to reach sort of an almost unsustainable
13 point, as opposed to "zero Covid", trying to keep them
14 extremely low, and you suggest -- and this is towards
15 the bottom of this paragraph -- that you think it would
16 have been better to have tried to identify -- rather
17 than running between those two extremes, tried to
18 identify what were the best and most effective NPIs
19 where, as you say, the best means maximum effect on
20 suppressing the pandemic for the minimum cost.

21 Is that something you feel either wasn't done at all
22 or wasn't done enough, again, in the sort of middle
23 period of 2020?

24 **A.** I think that that was the ambition, from May onwards,
25 I think whether that was accomplished, and to the degree

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1 the sentence starting however, you say:

2 "... I do believe we could have done more to prepare
3 for these scenarios."

4 So is it the case, Dr Warner, that you felt at this
5 time that more could have been done, as it were, by way
6 of sort of strategic planning rather than just reacting
7 to events?

8 **A.** Apologies, by "at this time", you mean?

9 **Q.** Well, I'm focusing on the period after -- from the
10 sort of middle of the first lockdown, where thought it
11 being given to emerging from lockdown, through the rest
12 of the year. But you tell me if you think that there
13 was a different time when strategic planning should have
14 been --

15 **A.** Sorry, you know, I just wanted to ... the statements
16 you've just read out, I agree with.

17 **Q.** Can you expand on them?

18 **A.** Erm --

19 **Q.** What is it that you're sort of driving at that you think
20 should have been done that wasn't?

21 **A.** I think that increasing the capability and the capacity
22 within government on analytics, science, software
23 engineering would have allowed those teams to have
24 greater resources, greater head speed to -- space to
25 apply themselves to key problems or possible future

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1 it was accomplished, I think is what I'm referring to in
2 the paragraph that you wrote before -- you read out
3 before.

4 **Q.** Are you saying it wasn't achieved as well as you think
5 it should have been, or as much as you think it should
6 have been?

7 **A.** Yes.

8 **Q.** Let's just look, again you wrote a few documents around
9 this time trying to capture this point, and I want to
10 show you one of them, which is INQ000195939.

11 Again, it's not dated, but I think it's sort of
12 around about April/May of 2020; is that right?

13 **A.** I believe I send it to Simon Case when he first became
14 perm sec, and in that email I say I sort of wrote this
15 five weeks ago, so I don't know when Simon became
16 perm sec --

17 **Q.** I think that's where I got my dating from.

18 But is it right in summary that what you're
19 exploring in this paper is this question of what's
20 the -- I think it may have been referred to with another
21 witness as smart NPIs or what's the most effective NPI
22 that we can -- or combination of NPIs --

23 **A.** Yes.

24 **Q.** -- that we can arrive at?

25 **A.** I think that is crucial, it's the system of NPIs that in

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1 particular I'm focused on in this document.

2 **Q.** We may see the best description of this if we look on
3 the second page of this document, where you say:
4 "... in order to lift the measures ..."
5 That's the coming out of lockdown?

6 **A.** Yes.

7 **Q.** "... we need to replace them with other measures that
8 have a similar effect on the epidemic, but a lower cost
9 to society more broadly (economic, societal/public
10 service, health)."
11 And so on.
12 Just pausing there a moment, we'll come on to see
13 that you say more about those sorts of other impacts of
14 a lockdown. We have, for example, so far today, you
15 and I, spent a lot of time talking about the
16 epidemiology, the infection rates, how many people are
17 dying and so on. Here you are mentioning the other
18 negative impacts of lockdown.
19 Were those things considered throughout the period
20 we have been discussing, so from the start of 2020? Did
21 they start to become considered more around this time,
22 in April and May 2020?

23 **A.** I think that ... from March 14 we essentially started to
24 construct a plan of suppression. In the time period
25 while we're trying to build the -- that -- the plan out

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1 crucial vulnerable groups who are indirectly affected",
2 and trying to make sure that their interests are not
3 missed in designing the best possible combination of
4 NPIs; is that what you're trying to say there?

5 **A.** Yeah, I think that in -- you know, in -- when we're
6 thinking about the system, we're trying to make sure
7 that we don't accident -- you know, harms are inflicted
8 lots across society and not inflicting them on a group,
9 maybe because two measures inflict that harm on a single
10 group of people, and that means that that group of
11 people is seeing the full harms compared with the rest
12 of the system. That's what I'm trying to say there.

13 **Q.** Yes. We can see that the examples you give are -- well,
14 the second is domestic abuse, about which we've heard
15 with other witnesses. You talk about "household
16 quarantine"; do you know what you meant?

17 **A.** I think what we're saying there is people who are having
18 to isolate in a situation where we would -- in
19 a situation where there is domestic abuse going on.

20 **Q.** So this all seems very important, Mr Warner, and points
21 like giving careful thought to the impact on these
22 vulnerable groups and so on is obviously -- perhaps
23 obviously the right thing to do.
24 You are talking here quite strategically, sort of
25 blue skies thinking. How much were these principles

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1 of lockdown -- apologies, I can't remember the name of
2 that one that released sort of -- I think it was sort of
3 mid-May -- we're trying to push towards this idea of:
4 okay, how can we control the virus but mitigate the
5 harms that, you know, everyone was definite -- was very
6 aware of?

7 **Q.** The economic and societal harms?

8 **A.** Yeah. I mean, public service and health, yeah.
9 You know, these were -- these harms were talked about.

10 **Q.** If we see in this list of three points that we have on
11 the screen here --
12 **A.** I think it might be four and I've just mistyped.

13 **Q.** Well, we're looking at the first three anyway. You --

14 **A.** Sorry, by that, I meant "economic, societal [comma]
15 public service, health".

16 **Q.** I see. Well, I was going to move on to the three
17 numbered points --
18 **A.** Oh, apologies.
19 **Q.** Don't worry.
20 You're describing there, aren't you, in these
21 numbered points this way of sort of integrating and
22 trying to achieve the most effective combination of
23 NPIs?
24 **A.** Yes.
25 **Q.** And in particular in point 3, you refer to the "small

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1 taken up in the actual decision-making in Downing Street
2 in the weeks and months that followed?

3 **A.** Here I'm trying to suggest sort of a systematic approach
4 to this problem, and about thinking about it as
5 multi-disciplined teams. My opinion is that lots of
6 people -- there's lots of expertise, you know, policy,
7 science, analysis, and putting those people together in
8 a team is very effective, and actually the sort of
9 standard government silos is not necessarily the most
10 effective way, in my opinion, of working. And so I'm
11 trying to pitch a slightly different way of working into
12 government and how it thinks about these problems.

13 **Q.** We're going to come on to talk about your proposal for
14 a Covid-A, a sort of analysis team. Is that what you --
15 the sort of thing you've got in mind here, or not quite
16 the same?

17 **A.** I think that they are looking at different problems.
18 Here what I'm trying to suggest is for this problem of:
19 how do we improve the system of NPIs? That's what this
20 is looking at. The Covid-A is more about the fact that
21 policy takes time to write, and the analysis for that
22 policy takes longer. The analysis that that data is
23 based on, so the collection of that data, takes even
24 longer to build, especially if you have to collect it
25 and there's a time sequence to it.

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1 So for Covid-A I'm talking about the leadership and
2 the decision-making structures as to, you know, what is
3 the appropriate data infrastructure to build, what
4 should the analysis be done, that has to be done
5 eight weeks in advance for a decision that might be
6 needed for the policy.

7 So they are all around trying to push forward how
8 government thinks about analytics, but one is around
9 a specific problem, and the other one is around: how do
10 we lead and organise as a sort of a group?

11 **Q.** Before we leave this, though, Dr Warner, back to the
12 main point, which is that things didn't work out quite
13 as neatly as this, NPIs weren't finessed and thought
14 through deeply, with a sort of a well thought through --
15 out -- thought through combination of measures being
16 imposed. Perhaps you'll say they were, but the scheme
17 that you're suggesting here, do you agree, wasn't
18 something that worked, at least in full, in practice?

19 **A.** It wasn't implemented.

20 **Q.** And was that because that events just made it
21 impossible, or do you think that it could have been and
22 should have been implemented?

23 **A.** Erm ... I think every person has their own opinion on
24 what is the best way to organise. In the end, the
25 Covid Taskforce organised along more traditional sort of

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1 **Q.** They're in three little time groups, so I'll take you
2 through them each and then ask you about them all
3 together, if I may.

4 So starting about four, five lines down from the
5 top, on 18 September -- do you see that -- you saying:

6 "I feel like you and I walked out of covid in June,
7 walked back in today. And literally nothing has
8 changed!"

9 Lee Cain says he agrees, and you say "Mad".

10 So there's an exchange in the middle of September.

11 Moving forward almost a month into October,

12 12 October, Lee Cain says:

13 "We are so fucked."

14 Lee Cain says:

15 "Why are we not acting in London and urban areas
16 now? Same errors as March."

17 You say:

18 "Agreed. Feel like we are where we knew we would be
19 three/four weeks ago."

20 Lee Cain says:

21 "Should have done a circuit breaker. And still
22 should -- half term might be too late. London will soon
23 be out of control."

24 Then if we can go down two or three more lines,
25 another fortnight or so to 30 October, you say:

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1 government lines of policy delivery, analysis. I don't
2 think we ever got to the bottom of -- you know, it was
3 a continued vexing question in February as to what is
4 the most effective system of NPIs, so I think that the
5 system that we had in place didn't quite manage to do
6 it.

7 However, whether this would have accomplished --
8 which is what is a very hard task, I think, is ...

9 I can't speak to whether this system would have worked.

10 **Q.** No. No.

11 Let's move on, please, Dr Warner, and I want to
12 ask -- we're going on towards the autumn of 2020 now.
13 We all know what actually happened, we know that there
14 were calls from the scientific community for a circuit
15 breaker lockdown. You were still attending SAGE at this
16 time, I think, so you would have known all about that.
17 We know that, at least initially, that is not what
18 happened; rule of six, local tiers, and so on.

19 I want to ask you to look at some WhatsApp exchanges
20 that you had over this period with Lee Cain, who has
21 given evidence to the Inquiry, and I'm going to show you
22 them and then ask you about them after that, if I may.

23 I'm on page 3. You see them on the screen,

24 Dr Warner. Do you see them?

25 **A.** Yes.

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1 "I feel like we have accidentally invented a time
2 machine."

3 Lee Cain says:

4 "Oh mate."

5 And then:

6 "I can't take this insanity."

7 Now, so over a period of a month, or a month and
8 a half, three short exchanges, you'll see they have
9 similarities, you both seem to be saying and agreeing
10 perhaps that not enough lessons have been learnt from
11 experiences earlier in the year, perhaps that lockdowns
12 should have been ordered earlier.

13 Can you tell us, if necessary looking at the three
14 exchanges in turn, what you thought around this time and
15 whether these exchanges reflect your thinking or not?

16 **A.** So, I mean, I feel these WhatsApps are indicative of
17 what I was thinking but not necessarily the best
18 evidence. I think that it's clear in -- can you scroll
19 up to the top so I just get the dates right?

20 **Q.** Yes, so 18 September.

21 **A.** Yeah. So in -- actually earlier than that, if we're
22 honest, we had a rising problem with infections,
23 infections were rising. Indeed, I believe if you -- and
24 so, you know -- and when I say to Lee, "We walked out of
25 Covid in June, walked back in today, and literally ..."

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1 what I'm saying is that the capabilities that we
2 discussed earlier actually, track and trace, things like
3 that, did not manage to stem the virus, our knowledge of
4 what NPIs were most effective was not that much more
5 advanced. So essentially the decision-making that was
6 occurring -- actually, the one thing I would say here is
7 we do have the ONS infection study. That is
8 an excellent piece of analytical work which actually
9 allows us to be very clear, when we're talking about
10 infections rising. When we talk about "We knew where we
11 were three/four weeks ago", that's predictions off the
12 ONS infection study. This is basically, you know, we
13 are seeing that infections will keep rising until you do
14 something.

15 **Q.** So expand on that a little, but do you -- was it really
16 therefore your view that things -- the best use hadn't
17 been made of the time from, say, April/May through to
18 the autumn?

19 **A.** I detailed, you know, sort of, in my witness statement
20 some of the things about -- on that period, and some of
21 the things that I think we could've brought in better,
22 some of the ways we could improve the analytics.

23 **Q.** Yes. What about this idea that there should have been
24 a lockdown in September/October? I think perhaps in
25 fact you and Mr Cain might not have had quite the same

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1 **A.** I believe what happened was at the end of the meeting
2 that I refer to in my witness statement, I actually
3 argued both sides of the lockdown, both a pro-lockdown
4 argument and an anti-lockdown argument.

5 **Q.** Go on.

6 **A.** I think that in November, if you have a four-week
7 lockdown, I believe, rule of thumb, one week of
8 lockdown -- no, sorry, two weeks of lockdown moves you
9 back, let's say, one week. So moves you back
10 four weeks. So let's just say that if you lock down in
11 November, you end up at the end of September. Well, in
12 the end of September we were arguing for lockdown.
13 Right? So essentially what you're arguing for -- is
14 you're back in an area where you were arguing for
15 measures anyway. That would be the argument against the
16 lockdown. Well, it basically say -- sorry.

17 So, yeah, so --

18 **LADY HALLETT:** I think you've lost me.

19 **A.** Yeah, I'm sorry, I've lost myself.

20 **MR O'CONNOR:** Okay --

21 **A.** So, yeah, let me start again, I'll try and be a bit more
22 clear.

23 A four-week lockdown will reduce infections, let's
24 say, just rather than trying to do maths in my head
25 under pressure, back to let's say late September. In

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1 view on that matter?

2 **A.** I think I refer to this in my witness statement.

3 **Q.** Yes.

4 **A.** So not -- not having that in front of me, I think my
5 answer would be that there are probably two arguments
6 for, let's say, increasing the stringency of measures
7 for a short period. The first is that -- the obvious
8 effect that that might have on infections. The other is
9 that maybe that increases public awareness, maybe moves
10 people's behaviour in -- towards, you know, behaviour
11 you want, maybe less -- more people work from home,
12 et cetera.

13 My opinion at that time was that infections would
14 continue to rise unless we brought in more stringent
15 measures, so I believe that I was of the opinion that
16 actually it was about bringing in the measures that we
17 thought we could hold for the whole of winter because
18 they would be necessary, not necessarily bringing in
19 stringent measures and then going back to as we were
20 today. So I think that was my opinion at that time.

21 **Q.** You do describe in your witness statement that when the
22 time came for, in the end, Boris Johnson imposing the
23 second lockdown at the very end of October, you actually
24 thought that a more extensive and longer lockdown should
25 have been ordered than was in fact ordered?

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1 late September, SAGE were arguing that we need to bring
2 in measures. Therefore actually that's an argument that
3 a four-week lockdown is not long enough to --

4 **Q.** Inadequate?

5 **A.** Yeah, exactly.

6 Now, obviously lockdowns bring with them tremendous
7 harms, therefore if you don't think that -- if you think
8 the lockdown, as to use your words, was inadequate, is
9 that an argument for actually maybe the lockdown -- the
10 harms of lockdowns are more.

11 So it isn't to say that I thought that the lockdown
12 was the wrong thing to do. As I say in my
13 decision-making, in my document, I think it's done.
14 I think that these are complicated, hard decisions where
15 there is, you know, uncertainty on how people behave,
16 what will actually happen with how the -- how much
17 infections will drop, et cetera.

18 **Q.** Just before I leave this, coming back to the point you
19 made earlier, what we've been discussing is that
20 decision made at the time, but for the reasons you've
21 already given there are things which you say could have
22 been done much earlier, earlier in the year, which might
23 have prevented the need either for lockdowns at all or
24 for lengthy lockdowns later in 2020?

25 **A.** Erm, sorry, I'll have to read -- but I think I'm trying

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1 to say that you might have to lock down but we'd
2 alleviate some of the harms, which isn't necessarily the
3 time under lockdown. It's clear that there are,
4 you know, lots of people and lots of bits of -- there
5 are costs of lockdown across. as we discussed earlier,
6 the health -- people's health, public services, the
7 economic costs, the social costs, and actually we
8 could've maybe brought in measures to mitigate those,
9 even if the exact sort of length of lockdown and the
10 measures stay the same.

11 **Q.** Yes, I see. Thank you.

12 Let me move on to a slightly different issue,
13 Dr Warner, and that is towards the -- your analysis of
14 data during the pandemic. To do this, let's look at
15 page 42 of your statement, paragraph 150, first of all.
16 Is the first point you make -- which is certainly
17 something we've heard from other witnesses -- was simply
18 about the relative unavailability of data in the early
19 phase of the pandemic? And you give an example of SPI-M
20 struggling to access test and trace data.

21 First of all, can you expand on that problem
22 briefly, and do we infer from your reference there to
23 the early stage of the pandemic to the fact --
24 suggestion that this was a problem which got better or
25 resolved later on?

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1 **A.** Yes.

2 **Q.** Are these similar ideas that you're referring to here?

3 **A.** Yes.

4 **Q.** Can you expand on what you saw as being your main
5 concern in this regard then?

6 **A.** I think that, you know, analytical work is hard, it
7 needs teams to have the right time, space, data,
8 capability, also expert knowledge. I think that
9 that's -- and often those teams didn't have that, which
10 meant that they were trying to do the best that they
11 could, given the capabilities, capacities, time they
12 were able to, rather than the piece of work that we
13 would all think would be appropriate for that moment in
14 time.

15 **Q.** On a similar theme, Helen MacNamara, when she gave
16 evidence, talked about an overemphasis on what she
17 described as countable things -- I know that you've
18 looked at that statement of her witness statement -- and
19 the problem being that other issues, things like
20 domestic abuse or even things like older people being
21 isolated, because they didn't sort of register in -- on
22 the figures, were overlooked.

23 Is that a similar issue, do you think, to your
24 critique about insight rather than data?

25 **A.** Yes.

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1 **A.** Data sharing is a problem, an acknowledged problem in
2 government, how you do it. We shouldn't overlook that
3 there are reasons, that, you know, we need to protect
4 people's privacies, et cetera. In that period of time,
5 I'm trying to -- we're also running -- there's another
6 set of work around how we might be able to improve data
7 sharing. In this cases, like SPI-M not -- struggling to
8 access the track and trace data is obviously a problem
9 that creates uncertainty in the model that doesn't need
10 to be there. I'm sure there's other teams in -- across
11 government that don't have access to data that would
12 have been useful to them.

13 **Q.** So that's an issue relating to simply the availability
14 of data.

15 If we could look on at paragraph 152, though, you
16 say that your main concern was not, by inference, this
17 question of availability of data, but rather that the
18 analysis work was too shallow. You say you felt that
19 too often it -- that is the analysis work -- "contained
20 a large number of quantitative judgements where no
21 evidence was shown, and too often included graphs with
22 unlabelled axes, or which were unreadable", and so on.

23 Elsewhere in your statement you used this phrase
24 "the importance of providing insight rather than or
25 before data".

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1 **Q.** And help us: I mean, we're looking forwards; if we have
2 another situation like this, what would you recommend
3 for change, how should things be done differently to try
4 and provide more insight next time?

5 **A.** I think that it's important to recognise the dashboard
6 was a very important product that served a very
7 important need, that allowed decision-makers to have
8 up-to-date information on the crisis at that time. But,
9 like any tool, it should not be used for every single
10 purpose. For instance, I'm not sure what Helen means by
11 not showing up in the data, whether she's saying it's
12 a perceived risk, whether it's there is evidence of this
13 occurring but not in the data that is being shown in the
14 dashboard, or that there isn't any data on it. All
15 those things could be true.

16 But I do think that for the future it's important --
17 and this is where we speak to sort of Covid-A -- it's
18 about what is the right tool, the appropriate tool for
19 the problem we're trying to solve and making sure that,
20 given that lens, do we have other lenses on the world to
21 ensure that we think we've got a proper view of the
22 situation, of the priorities, and to make sure that we
23 understand as best as we can what the evidence is before
24 we make a decision.

25 **Q.** I think her suggestion was that certainly dashboards, as

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1 you say, were very useful, but perhaps they should
 2 include other areas of these sort of richer picture
 3 items as well as hospital capacity and so on?
 4 **A.** I think that the way I would look at it is that modern
 5 dashboards, we can build automated system that very
 6 quickly flow the most recent data to Number 10. The
 7 speed at which analysis or policy or information flows
 8 to Number 10 is through traditional processes, people
 9 emailing private offices, emailing -- private offices
 10 emailing, et cetera.
 11 So what I would suggest is that what we need to do
 12 is build out similar toolkits that allow us to make sure
 13 that decision-makers have the appropriate information on
 14 risks like this, or alternatively make sure that
 15 decisions are taken at the right level where that
 16 information is known; and that is the other side of the
 17 same coin but looked at from a different way.
 18 **Q.** Sticking with data, Dr Warner, but moving on to
 19 a slightly different issue, you were obviously very
 20 immersed in all of these data issues during the
 21 pandemic. When did it become obvious to you, on a data
 22 perspective, that there were ethnic disparities or
 23 disparities in the experience of different ethnic groups
 24 appearing in the data?
 25 **A.** I remember discussions in SAGE to this effect, but
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1 page 79 of your statement, please, paragraph 309. You
 2 say that:
 3 "[You] felt that the biggest absence throughout the
 4 pandemic was the lack of economic modelling in decision
 5 making."
 6 You say that:
 7 "HMT, who is responsible for economic modelling, has
 8 a strong set of policy officials, but when it came to
 9 [your] interactions for all aspects of [your] work in
 10 government, [you] found that HMT was severely limited
 11 when it came to specialists in science, advanced
 12 analytics, technology or data."
 13 Now, in June 2020, you chaired a seminar at
 14 Number 10 touching on these issues, I think it was
 15 called "The Economics of Lockdown". I'm going to take
 16 you to an email about it in a moment, but, well, let's
 17 look at the email and then I'll ask you the question.
 18 It's INQ000235261, please.
 19 This is in fact an email from Clare Lombardelli, who
 20 gave evidence this morning. She was at this seminar.
 21 You are not copied in on the email, I think it's
 22 an internal HMT email.
 23 We'll look at the content of it in a moment, but can
 24 you give us some evidence from your own knowledge about
 25 how this seminar came about, who arranged it, what was
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1 I can't give you an exact date.
 2 **Q.** So that's the SAGE probably February/March, realising,
 3 noting that the hospital data probably was showing up
 4 differential experiences.
 5 Was this something that was taken forward without(?)
 6 the dashboard or trying to develop these sort of data
 7 analytical techniques at an early stage or not?
 8 **A.** I don't know what was in the dashboard. The dashboard
 9 had a large range of information.
 10 **Q.** Was it something, whether it's on the dashboard or in
 11 other terms of data exploitation, that you had personal
 12 involvement in?
 13 **A.** I don't think I did, no.
 14 **Q.** Or experience of?
 15 **A.** I don't have any memories of that.
 16 **Q.** Do you, sitting here now, have any sort of reflections
 17 on whether enough was done to capture or analyse the
 18 disparities that emerged during the pandemic?
 19 **A.** As discussed in my statement, I think that our data
 20 collection, our analysis, our ability to spend time to
 21 look for that, was weak across the board, and I think
 22 the reason that that is important we strengthen it for
 23 the very issues that you're raising now.
 24 **Q.** Let me move on to another issue, and that's economic
 25 advice and modelling. For these purposes, can we go to
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1 its purpose, and so on?
 2 **A.** I don't ... I don't remember how it was set up, I think
 3 it's very unlikely that I set it up, because I had very
 4 good relationships with the BEIS data science team who
 5 I knew were doing a lot of work in this area, therefore
 6 if I was to organise a seminar of this type, I'm almost
 7 certain I would have involved them.
 8 **Q.** Can you give us any clues as to who set it up? Can we
 9 assume it was set up at the Number 10 end of things
 10 rather than, for example, by the Treasury?
 11 **A.** Erm ... if it was -- from the email it looks like it was
 12 not set up from the Treasury, and therefore the other
 13 two people in the room were Simon Case of Number 10 or
 14 Patrick Vallance, and of those two -- well, your guess
 15 is as good as mine.
 16 **Q.** All right.
 17 Well, let's look at the email. Clare Lombardelli
 18 is, as it were, reporting back to her colleagues, isn't
 19 she? She says she attended "an odd seminar with the
 20 above title". Well, how much memory do you have of the
 21 seminar now, Dr Warner?
 22 **A.** Erm ... almost nothing.
 23 **Q.** All right.
 24 She refers to it, "The castlist was the below", and
 25 I think she's referring to the -- if we scroll out, it's
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1 the addressee list for the email below. It seems to
 2 suggest that Chris Whitty may have been there, and
 3 Simon Case, and someone from the Bank of England, and
 4 also Patrick Vallance. Does that sound right to you?
 5 Or perhaps you can't now remember.

6 **A.** My -- I would trust the email list over my memory.

7 **Q.** Yes. But certainly it seems to be -- we can see that
 8 it's some people -- a high level discussion; yes? The
 9 Cabinet Secretary --

10 **A.** I believe he was --

11 **Q.** No, he was a permanent secretary in the Cabinet Office.

12 **A.** But, yes, agreed. You know, you're looking at four,
 13 maybe five perm secs in that meeting.

14 **Q.** Yes. Then this:

15 "The discussion would felt very familiar -- the
 16 economists all did a very clear pitch on smarter NPIs
 17 being able to deliver the same level of virus control at
 18 lower [economic] cost."

19 She refers to a paper.

20 "There was a general conclusion (by economists) that
 21 the economics is not being considered enough. And
 22 a desire for a place to bring this together. They
 23 posed 3 options:

24 "1. An economics SAGE.

25 "2. A single model.

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1 forecasting the economy is incredibly difficult,
 2 forecasting an epidemic is incredibly difficult.
 3 Although it might seem hard, given the costs of lockdown
 4 I think it's worth at least a good try, especially given
 5 that there did seem to be groups out there who were
 6 trying it.

7 **Q.** Certainly the view of Professor Keeling, who had done
 8 this work during the pandemic, and also
 9 Professor Woolhouse, another epidemiologist who gave
 10 evidence -- we saw his email at the beginning of your
 11 evidence -- was that this is something that ought to be
 12 worked on before the next pandemic, more sophisticated
 13 models that could draw these factors together.

14 You're not telling us that that's a fool's errand?

15 **A.** I think that it's ... it's important that we don't think
 16 that the next crisis will be exactly the same. In my
 17 opinion, upgrading the capability within government to
 18 be able to build out models of this type, to be able to
 19 engage intelligently with academics, bring people in and
 20 bring the most of our quantitative -- the possibilities
 21 using quantitative modellings to bear on the problem is
 22 crucially important. But I would look at this not as we
 23 should be building a model; more we should be building
 24 the people and the structures and the capability to be
 25 able to do that for any future crisis.

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1 "3. Something more informal."

2 Pausing there, as we've just seen, you also felt
 3 that that more economic modelling, more economic
 4 analysis ought to be being done, did you not?

5 **A.** Yeah, I mean, that's probably why I was invited to this.

6 **Q.** So carrying on reading, Clare Lombardelli states:

7 "The economists [obviously] killed the single
 8 model ..."

9 We asked her this morning why it was so obvious that
 10 the economists killed the single model, and in summary
 11 she said: well, it's just not achievable to have
 12 a single model which takes into account both
 13 epidemiology, health, economics, other --

14 **A.** I believe that there is one.

15 **Q.** Well --

16 **A.** I believe that there is a -- I think it's called
 17 Open ABM that I believe Goldman Sachs helped build.

18 **Q.** We've also heard, Dr Warner, from someone called
 19 Professor Keeling at Warwick that during the pandemic he
 20 started and did produce a model which addressed both
 21 epidemiological factors and at least some economic --

22 **A.** Yeah.

23 **Q.** -- factors. But does it seem obvious to you that the
 24 idea of a single model is hopeless?

25 **A.** I think that, you know, it's important to recognise that

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1 **Q.** Yes. Well, that's a useful caveat, but I think it's
 2 actually not far from what Professor Keeling and
 3 Professor Woolhouse were saying because, as you say,
 4 there's no point in building the precise model that you
 5 would have used last time now, but you want to be able
 6 to have that capability swiftly if another pandemic
 7 hits.

8 **LADY HALLETT:** Dr Warner, can I ask a question? Sorry to
 9 interrupt.

10 Looking at, if we could scroll down to the passage
 11 which says:

12 "There were ... some useful titbits.

13 "CBI have data ..."

14 Just highlight that passage.

15 Am I being simplistic in this approach: you see the
 16 reference to:

17 "Hospitality: 20% to 30% operable at 2 [metres];
 18 60-70% at 1 [metre]."

19 Can you find that?

20 **A.** Yes.

21 **LADY HALLETT:** "Most in the sector need 70/80% to be
 22 viable."

23 **A.** Yes.

24 **LADY HALLETT:** Now, as a simple soul, I think: right, okay,
 25 so if 70% of hospitality -- sorry, if hospitality needs

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1 70% of capacity to be viable, and they can operate 60%
 2 to 70% at 1 metre, I would then want to know as
 3 a decision-maker: what would be the impact of having
 4 a 1-metre rule rather than a 2-metre rule?
 5 Is that too simplistic?
 6 **A.** I often find with analytics actually the most simple
 7 reading is actually the most sensible reading.
 8 **LADY HALLETT:** Would that kind of data or analysis have been
 9 with the decision-makers back at this time?
 10 **A.** I mean ... no, I think that -- so I think I agree with
 11 you, that is the reading. I don't know if that -- even
 12 that very simple information would have been with
 13 decision-makers. But I also think it's important that
 14 60 -- that says they have capacity to be viable. Well,
 15 actually the other option is: how can we increase their
 16 capacity? For instance, you know, outdoor spaces. How
 17 would that have made a difference?
 18 So I think that is the level of analysis that we
 19 need to push to, to not just taking -- given the current
 20 state, but what can we do to get to a better answer to
 21 mitigate the harms. And I think -- so I would agree
 22 with you, and I don't know if this was made available to
 23 decision-makers.
 24 **LADY HALLETT:** Sorry to interrupt.
 25 **MR O'CONNOR:** Not at all, my Lady.
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1 thoughtful people working with government is a good
 2 idea.
 3 **Q.** One view -- and this was a view expressed by
 4 Mr Glassborow when he gave evidence -- says: we've got
 5 the Treasury, it's stuffed full of economics experts,
 6 this is what the Treasury does, it provides economic
 7 advice and analysis to government, so why would you need
 8 an economic SAGE, you'd just be duplicating things.
 9 What's your view about that?
 10 **A.** I think that ... leaving aside my view of what the
 11 capability of the Treasury is, obviously having the
 12 diversity of viewpoints is important, obviously bringing
 13 in outsider expertise is valuable. I think there is --
 14 to say that you know everything about such a complex
 15 problem, I'm not -- I don't think Stuart was saying
 16 this, by the way, but I think that obviously there is
 17 expertise to be had within our academics.
 18 **Q.** Did you follow this idea up at the time?
 19 **A.** Yes.
 20 **Q.** And what happened?
 21 **A.** So I believe the series of events is that
 22 Patrick Vallance suggested sectorial teams, and
 23 I believe Clare Lombardelli might have replied saying
 24 "Yes, that's a good idea". I made, I believe,
 25 an argument for using the -- for a single model.
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1 Coming back to just, in fact, the paragraph above
 2 the one we were just look at, Dr Warner, we talked about
 3 the economists obviously killing the single model;
 4 reading on, it says:
 5 "... some liked the idea of an economics SAGE. It
 6 was agreed that Ben Warner would follow up with
 7 [Ms Lombardelli], [Patrick] Vallance ..."
 8 And others.
 9 Two questions. First of all, did you like the idea
 10 of an economics SAGE? And, secondly, did you follow up
 11 with those people about it?
 12 **A.** So, I mean, I think that ... yeah, I think -- I am of
 13 the opinion that government doesn't make enough of their
 14 expertise that exists across the UK, whether it's in the
 15 academic sector or in the private sector. I think SAGE
 16 is a fantastic initiative, their science bit is the high
 17 water mark of government using the resources of the
 18 whole of the UK to bring to bear on a problem. So
 19 I think that obviously to me the economics similarly
 20 would be useful. The exact and precise method of doing
 21 that, to say whether it should be a SAGE-like structure
 22 or maybe having academic -- economists with a specialism
 23 working with departments, I'm not an expert on
 24 economics, I wouldn't be able to tell you the right
 25 docking mechanism, but obviously having the very
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1 I don't know past that. I don't think it would have
 2 been appropriate for me to set up this type of body.
 3 I think that ... I'm not an economics ...
 4 **Q.** Economist?
 5 **A.** Economist, and I don't have a, you know, an in-built
 6 knowledge of government departments, the best way to
 7 lock it in, et cetera. But I do think an economic SAGE
 8 would have been -- or, no, I think us making more use of
 9 our academic sector across the piece, I mean, I don't
 10 think we should specialise just economics, there's other
 11 people -- for instance, I had a very interesting talk at
 12 one point with a health economist who I tried to dock
 13 into testing, because I think the more people we get in,
 14 and also the more resources, right? I think that
 15 throughout the time in Covid we saw that the capability
 16 and the capacity of the academic teams was -- they were
 17 struggling at times, and giving them that extra resource
 18 to give -- would definitely be helpful. You know, our
 19 academic sector is packed full of really talented people
 20 and we should always be trying to use them in
 21 government.
 22 **Q.** Can I show you a related document, Dr Warner, and it's
 23 at INQ000226497. This is a recently published -- well,
 24 recently; it's April of this year -- report by the
 25 Institute for Government. We can see it's entitled "The
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1 Treasury during Covid".

2 I'm going to take you to one or two passages in

3 this, but perhaps before we do, it's important to

4 understand: did you have some input into the research

5 for this paper?

6 **A.** Yeah, I believe that the team that wrote this paper

7 talked to me before writing this document.

8 **Q.** All right. Well, I'm going to ask you about one or two

9 passages in here, and when I do so you can tell us

10 whether the subject matter is something that you spoke

11 to the team about. We don't want to have a sort of echo

12 effect.

13 It may just be that we can look at one passage. If

14 we can go to page 6, please, this is the executive

15 summary chapter. At the bottom of the page, please,

16 final paragraph, we see the report says:

17 "... when it came to more in-depth economic

18 analysis -- for example, predicting the potential

19 economic impacts of different policy options or

20 projecting how economic behaviour might respond to

21 a renewed spread of the disease -- the Treasury shared

22 information much less effectively with the rest of

23 government, particularly in 2020."

24 Then this:

25 "Senior Treasury officials also vetoed proposals

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1 told us you tried --

2 **A.** Sorry, I didn't want to give the impression that I tried

3 to set up an economic SAGE. I -- there was follow-up to

4 that. I don't think I would have been the appropriate

5 person to set up an economic SAGE. I don't even know

6 who are the -- what are the best economic departments in

7 the UK.

8 **Q.** I see.

9 All right, well, let's just look at one more angle

10 on this -- it may be that it helps, maybe it doesn't --

11 but it's a WhatsApp exchange you had with Tom Shinner,

12 who worked at the Cabinet Office, did he not?

13 **A.** I believe Tom Shinner was brought into Number 10 to help

14 with the tracking of projects.

15 **Q.** Right. So at Number 10 rather than the Cabinet Office.

16 If we can look at INQ000269187, please, page 17. So

17 we note that this is -- it's towards the bottom of the

18 page. Yes. So I'm showing you where it starts

19 "Depressingly". So let's just note the date, we have

20 gone forward a bit, it's February 2021. So I think it's

21 Tom Shinner who says:

22 "Depressingly I think there's quite a lot of truth

23 in this about Treasury approach."

24 You say:

25 "I am waging my own small war against HMT, their

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1 from other departments to establish a cross-departmental

2 group to discuss economic impacts and the proposal for

3 a socio-economic version of ... (SAGE), which could have

4 fed external expertise into government in a more

5 systematic way."

6 First of all, was this an area of their research

7 that you spoke to the researchers about?

8 **A.** I'm afraid I can't say with any certainty.

9 **Q.** All right.

10 Well, leaving that to one side, then, can you help

11 us understand this suggestion that plans for economic

12 SAGE, which we just saw being discussed at the seminar

13 and in that email, may have been vetoed by senior

14 Treasury officials?

15 **A.** I think that Treasury would have been the appropriate

16 place for an economic SAGE, in the same way GO-Science

17 is the appropriate secretariat for the scientific SAGE.

18 It did not occur. That's all I can --

19 **Q.** Well --

20 **A.** "Vetoed" could mean an active veto or a passive veto,

21 and I don't know which one the Institute for Government

22 is referring to here.

23 **Q.** Well, let me just ask you about your own experience,

24 Dr Warner. You were the person looking at that email

25 who was tasked with trying to take this forward. You've

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1 culture is fucked.

2 "My new favourite line whenever they mention

3 VFM ..."

4 Value for money?

5 **A.** I believe so, yes.

6 **Q.** "... is 'well it's only X percent of eat out to help out

7 and probably won't have such a terrible effect'."

8 What were your views about the HMT's culture in

9 February 2021?

10 **A.** I think that HMT, in some ways they have a very strong

11 culture that enables and empowers their officials, and

12 that culture is very effective for some things they do.

13 I think that that culture becomes -- has a positive

14 effect, but I think it has a negative effect when it

15 comes to places where special technical knowledge, like

16 I mentioned around advanced analytics, data, technology,

17 and I think in that areas it creates a negative effect.

18 Also at this point I think that we are discussing

19 with head Treasury around the use of the toy model, and

20 I feel like they -- as my witness statement documents,

21 that I was concerned that the Treasury were not

22 necessarily providing a neutral set of information for

23 the Chancellor to make decisions upon.

24 **Q.** Yes. Well, that is something that's in your witness

25 statement, but I'm not going to go into it with you in

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1 detail now.

2 Just sticking with this idea of the culture, you've
3 referred to matters that, as it were, internal to the
4 Treasury, their resources, their analytical capability,
5 what they were doing or not doing properly with the toy
6 model. Is it possible that your rather jaundiced
7 impression of their culture also relates to their
8 co-working and the way in which they were or weren't
9 working with other government departments and Number 10?

10 **A.** I think that an open, transparent culture is always
11 crucially important. I think that I had that working
12 with numerous other organisations and groups. I think
13 it is also important to mention, though, that for some
14 of my interactions with Treasury, this message is true.
15 However, in other areas they were unbelievably helpful,
16 they were thoughtful, and really helped. For instance,
17 they actually seconded a couple of officials into 10DS
18 to help us around the spending review.

19 So I think it's important that, you know, when we
20 reflect on these WhatsApps, that we're seeing a specific
21 view at a specific point of time about, you know, one
22 issue and it doesn't necessarily reflect my entire views
23 of what is a complex organisation.

24 **Q.** Thank you, Dr Warner, we can take that down.

25 Just one further quick issue, and then I want to ask
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1 **Q.** Yes, and there are other references in the book which
2 make you think that we're certainly in the first few
3 months of 2021 rather than 2020.

4 **A.** Yes.

5 **Q.** So with that in mind, here we have a reference to
6 Long Covid then, in the spring or thereabouts of 2021.
7 Can you help us with any more context or information
8 about why you wrote that, what was in your mind, what
9 considerations perhaps were being discussed at the time?

10 **A.** I'm afraid that my recollection of this meeting ...
11 I don't know what meeting this is, I'm afraid. But it's
12 clear at this time we did know about Long Covid and if
13 infections increase then, even if we don't see deaths,
14 then Long Covid is obviously another thing to bear in
15 mind.

16 **Q.** All right. Well, I'll leave that there.

17 Finally, can we please go back to your witness
18 statement and to paragraph 288 on page 75. You refer
19 here, Dr Warner, to a retrospective meeting which
20 happened in February 2021.

21 **A.** Yes.

22 **Q.** We will remind ourselves that I think it was May 2021
23 that you left.

24 **A.** Yes.

25 **Q.** Did you already -- was that, as it were, a planned date?
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1 you about Covid-A. The quick issue is about an entry in
2 your diary referring to Long Covid. So can we -- sorry,
3 I said diary; it's a notebook, another one of your
4 notebooks.

5 Can we go, please, to INQ000264429, and it's -- you
6 have gone straight to that page, which is fine,
7 Dr Warner, because you have looked at this book and the
8 other pages of it, haven't you?

9 **A.** Yes.

10 **Q.** So we see there about five or six lines down a line
11 which says "Infections up -- long covid".

12 I want to ask you a few questions about that in
13 a moment, but before that, are you able to help us
14 roughly estimate the date on which you wrote that entry?

15 **A.** I believe from discussions earlier we decided it's about
16 March 2021.

17 **Q.** Right.

18 We can see just below that it certainly seems to
19 have been before June of whichever year you were in,
20 because you are wondering what's going to happen on
21 June 21st. So the main question was: was it 2020 or
22 2021?

23 **A.** You can see just above that it says, it may be spelt
24 incorrectly, "efficiency of AZ", which I think is
25 referring to the AstraZeneca vaccine.
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1 Did you know in February of that year that you were
2 coming to the end of your time, or not?

3 **A.** I believe so at this point.

4 **Q.** Because what we will see is that there was a meeting,
5 which I think you instigated, involving senior
6 decision-makers looking back over the last year or so
7 and trying to understand what had gone well and what
8 hadn't gone well.

9 **A.** Yes.

10 **Q.** I wonder whether that was partly because you knew you
11 were coming to the end of your time, or maybe that's not
12 the case?

13 **A.** I think that I was always trying to improve how we could
14 do -- improve analytics, improve data. I think that
15 it's important to realise that these are -- you know,
16 there's a lot of people doing different things, some of
17 which are -- fall within the government, some don't,
18 ONS, and how we could enable and empower the teams
19 was -- is always important. I actually did a similar
20 lessons learned exercise in September to try and make
21 sure we're understanding, making sure we're listening to
22 those teams, so that we -- when we're talking from the
23 centre, we're actually talking about the problems they
24 have, not the problems that we believe they have.

25 **Q.** Yes. This was, as we've said, a little bit further on
200

1 in February.

2 **A.** Yes.

3 **Q.** Hosted, as we see here, by Simon Case.

4 If you look at paragraph 290, we see the list of

5 attendees: Patrick Vallance, Chris Whitty,

6 Clare Gardiner, Susan Hopkins, Clare Lombardelli from

7 the Treasury, Ian Diamond. So a group of senior

8 individuals from different government departments --

9 **A.** Yes, I would say the senior technical -- the senior

10 analytic leadership of our Covid response.

11 **Q.** Let's look, if we may, just at the -- there are a number

12 of documents that we have relating to this meeting, but

13 I want to take you to the chair's brief for it, which

14 is -- thankfully we have it on screen. Again, a number

15 of issues that were discussed.

16 I'm going to ask you -- if we can turn to page 2 --

17 just a few questions about one of the themes, which was

18 around governance and decision-making structures.

19 Before I do that, can you just give us an idea of,

20 in more general terms, what the purpose of the meeting

21 was, what the sort of scope of the issues that were to

22 be discussed was?

23 **A.** If we just flick back one page --

24 **Q.** Yes.

25 **A.** -- we see that the idea of a retrospective, which is

201

1 decision-making structures. And, to be clear, this is

2 a document which was drafted before the meeting, wasn't

3 it, with -- which detailed the advance thoughts that the

4 people who were to attend the meeting had submitted?

5 **A.** So I believe that I talked to a large number of

6 different people across the entire analytical landscape,

7 including more junior members, because I think that's

8 also important, that we're not sort of just talking to

9 senior leaders, they -- these people lead large

10 organisations. So that's where my comments come from,

11 and then the senior leaders themselves I think put

12 forward a document as to what they believed, and I think

13 that Simon Case's private office had some very good

14 officials who constructed this document together to

15 provide him with the best possible speaking note so that

16 he could lead the meeting.

17 **Q.** So that's the genesis of it, and we can see that the

18 obstacle then is identified as there being no forum to

19 set the long-term analytic plan to prioritise resources,

20 to drive operational action or evaluate programmes. The

21 comment, which I think is your input --

22 **A.** Yes.

23 **Q.** -- says you feel this is where a lot of the other

24 problems stem from.

25 "That this meeting is necessary and needs to be

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1 a well known thing that is done often within software

2 development teams, where it's basically just trying to

3 uncover the mistakes that were made, and rather -- and

4 as the sort of retrospective, sort of, I'm going to call

5 it a creed, says:

6 "... [whatever] we discover, we understand and truly

7 believe that everyone did the best job they could, given

8 what they knew at the time, their skills and abilities,

9 the resources available, and the situation to hand ..."

10 So what we're trying to do here is to say to teams:

11 actually, like, it doesn't help us by playing some

12 sort of blame game. Actually we know that improving

13 analytics is important, we know this is a complex thing,

14 we need to make sure that everyone's -- and so it's

15 trying to promote that open, truthful, transparent

16 culture that actually allows us to discuss the issues

17 and move forward with solutions rather than play some

18 sort of blame game et cetera, which I'm not -- I don't

19 want to say in any way the fact that the senior

20 leaders -- but it was just an idea that is done in

21 software development that we thought might be valuable

22 here.

23 **Q.** Yes.

24 So if we can go over the page, then, the first of

25 the themes that was to be addressed was governance and

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1 hosted by the [Cabinet Secretary] is itself evidence of

2 the lack of this forum."

3 Then we see comments by others, including from

4 Patrick Vallance, commenting that there has been at

5 times a lack of clear reporting lines for SAGE in the

6 absence of COBR. And also Rob Harrison, for example --

7 who was a director general of the Cabinet Office,

8 I think -- saying, referring to general lack of

9 proactive longer term thinking.

10 So were these the problems to which you thought that

11 Covid-A was the answer?

12 **A.** Yes. I think that, as it says there about the

13 prioritisation of resources, the data infrastructure

14 that needs to be built, where is the best place to put

15 our software engineering talent at that point in time.

16 Those decisions, there was no forum for that; for also

17 discussing other problems that these teams were

18 happening, there was no forum. So that's -- my idea of

19 a Covid-A is -- it's just sort of like, well, there's

20 a Covid Operational, there is a Covid Strategy, so Covid

21 Analysis.

22 **Q.** Did you -- I think it did -- it was created, a Covid-A,

23 was it not?

24 **A.** Erm, I don't know what the energetic force of this

25 meeting and what it actually ended up doing, to

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1 a degree.

2 **Q.** Let's not worry too much, then, about -- in any event,
3 about what happened last time. But looking forward, can
4 you see that this is a sort of gap which might need
5 filling in future situations?

6 **A.** Yes, I think that ... I think it's important to realise
7 that the -- to build data infrastructure takes a large
8 amount of time, investment, to do analysis takes time,
9 therefore you need some body that's saying: okay, given
10 the amount of resources we have, we need to focus on
11 this problem, or to be able to move in the right set of
12 talent for the period in time. For instance, if you
13 need -- at a certain point you might need data engineers
14 to on-board the data, then you might need to bring more
15 data scientists in, and you might be able to re-move
16 those data engineers to another problem. So that
17 ability to flexibly bring in your talent to focus on the
18 priorities at the moment, given that with a long-term
19 vision in mind, I think that that senior analytical
20 leadership and how that is done for these type of
21 cross-government problems -- obviously departments are
22 doing this within their own sort of digital and data
23 teams, for instance, but how do we do that for the
24 cross-government problems, I think is what I'm talking
25 about here.

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1 of those specific areas, but in general those are
2 problems that occur for not just Covid but many other
3 government problems.

4 **Q.** And we heard about that in your evidence so far.
5 I suppose it stands to reason if there are problems
6 getting data it impacts upon the problems of analysis,
7 but can you identify for us were there any specific
8 impacts upon areas of devolved administration that
9 impacted upon your work?

10 **A.** I think that, as discussed previously, whenever you have
11 a lack of data, it means that you can't focus on those
12 problems. So the problems that you've mentioned
13 about -- that existed around devolved administration I'm
14 sure hindered the ability to analyse that data and then
15 produce the information -- the necessary information to
16 decision-makers.

17 **Q.** And was that something that you found? Were you
18 hindered in that regard?

19 **A.** In my role, that type of level of specificity around
20 a data source would not be what I would look at. We
21 tried to set up a -- well, we set up a data sharing team
22 within the central GDS, which I think moved to the CDDO
23 office, to try and give teams that are struggling with
24 those issues a set of experts that could them advice,
25 including legal advice, to try and address these exact

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1 **MR O'CONNOR:** Yes.
2 Dr Warner, thank you very much. Those are all the
3 questions I have for you. There will be just a few more
4 questions for you.

5 **LADY HALLETT:** Ms Mitchell.

6 **Questions from MS MITCHELL KC**

7 **MS MITCHELL:** I appear as instructed by Aamer Anwar &
8 Company on behalf of the Scottish Covid Bereaved.
9 Dr Warner, I'd like to ask you some questions about
10 data, in particular availability of data.
11 The Inquiry has already heard a little -- and
12 probably will hear a lot more in later parts of this
13 module -- that there were problems obtaining data from
14 devolved administrations, and that efforts were being
15 made to resolve these, in particular, that devolved
16 administrations thought they were unable to share data
17 on Covid because of GDPR, and we understand that efforts
18 were being made to obtain legal advice to explain to
19 them that that wasn't the case.
20 Were you aware of these difficulties in obtaining
21 data from devolved administrations, particularly in
22 relation to the Scottish Government?

23 **A.** Across government data sharing is an issue, and then
24 also how the statistics is done across the devolved
25 administrations. I'm not -- I don't believe I'm aware

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1 problems.

2 **Q.** Following up from that, can I ask whether or not you're
3 aware of the person who was involved in liaising with
4 the Scottish Government in that regard, so perhaps we
5 can follow up and ask that question?

6 **A.** I'm afraid I don't.

7 **Q.** Would you able to find that out for us?

8 **A.** I'm afraid that the question you're asking is very
9 important. It depends on the exact nature of the data,
10 where that data -- which department it sits in. So that
11 would -- that would be the place to ask, is the
12 department that was interacting on the issues that you
13 are worried about. And it could be actually multiple
14 departments, which speaks to why data availability in
15 government is sometimes very hard for these
16 cross-government issues.

17 **MS MITCHELL:** Thank you.
18 Thank you, my Lady, those are the questions that
19 I would like to ask.

20 **LADY HALLETT:** Thank you very much indeed, Ms Mitchell.
21 That completes the questioning, Dr Warner, thank you
22 very much. I'm sorry it's been a long afternoon for you
23 answering such questions, and with such care. Obviously
24 you've been very careful with your answers.

(The witness withdrew)

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1 **LADY HALLETT:** Thank you for all your help, and we shall
 2 resume tomorrow at 10 am. Thank you.
 3 **(4.50 pm)**
 4 **(The hearing adjourned until 10 am**
 5 **on Tuesday, 7 November 2023)**
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