

Counsel to the Inquiry's Note for the Third Preliminary Hearing in Module 2C of the UK Covid-19 Inquiry on Tuesday 12 December 2023

Introduction

1. The first and second preliminary hearings in Module 2C took place on 2 November 2022 and 22 March 2023 respectively. The purpose of this note is to provide the background to, agenda for, and introduce matters to be addressed at the third Module 2C preliminary hearing on Tuesday 12 December 2023. This will be a hybrid hearing with Core Participants either appearing virtually or in person at Dorland House, located at 121-141 Westbourne Terrace, Paddington W2 6BU. Counsel to the Inquiry will address the Chair in person at Dorland House.
2. There are 12 Core Participants in Module 2C, and all are legally represented. These Core Participants have been provided with regular updates on the progress of the Module since the last preliminary hearing. The third preliminary hearing is an opportunity to provide a public update on the Inquiry's work so far.
3. This note, and the third preliminary hearing, will address the following:
 - a. Update on Rule 9 requests - statements and exhibits;
 - b. The gathering of documentary evidence from the Executive Office (**TEO**) and other Northern Ireland Government departments;
 - c. Disclosure to Core Participants;
 - d. List of Issues, plans for the hearings in April/May 2024 and provisional list of witnesses;
 - e. Expert witnesses;
 - f. Every Story Matters, Commemoration and Impact Film;
 - g. Meetings between the Module 2C Legal team and Core Participants ahead of the public hearings.
4. Should any Core Participant wish to file brief written submissions on any of the issues set out above, these must be received by the Inquiry by **4:00pm on Tuesday 28 November 2023**.

Update on Rule 9 requests - statements and exhibits

5. The Module 2C Solicitor team circulated its most recent update note to Core Participants on 6 November 2023. This provided an update on the status of the requests made under Rule 9 of the Inquiry Rules 2006 by the Module 2C team and on other Rule 9 requests issued by the Inquiry concerning matters which relate, in part, to the scope of Module 2C.
6. As at the date of this update, Module 2C has issued more than 120 Rule 9 requests for evidence, including:
 - a. 31 corporate rule 9 requests (including four issued jointly with Modules 2, 2A and 2B);
 - b. 29 individual rule 9 requests; and
 - c. 62 impact questionnaires.
7. Corporate rule 9 requests have been made of:
 - a. All Northern Ireland Executive departments;
 - b. The Office of the Secretary of State for Northern Ireland;
 - c. Other public bodies in Northern Ireland including the Public Health Agency and the Northern Ireland Statistics and Research Agency; and
 - d. Organisations and bodies representing at-risk or vulnerable groups, and other relevant organisations which played a role in or have a relevant perspective to share on the core decisions taken in the management of the Covid-19 pandemic in Northern Ireland.
8. These requests have sought both corporate statements from these organisations and also extensive document disclosure relating to the scope of Module 2C.
9. Additionally, Module 2C has sent detailed Rule 9 requests to significant individuals within these bodies. These requests have been issued to individuals including:

- a. Key Northern Ireland government decision makers at the time of the Covid-19 pandemic, including Ministers who comprised the Executive Committee, Baroness Arlene Foster DBE, Michelle O'Neill and Robin Swann;
 - b. Senior Civil Servants within the Northern Ireland Executive Office, such as Sir David Sterling, Ms Jenny Pyper and Ms Jayne Brady. Module 2C has also made a Rule 9 request to Ms Sue Gray (former Permanent Secretary of the Department of Finance in Northern Ireland and Second Permanent Secretary with responsibility for the Union and Constitution Directorate in the United Kingdom (amongst other roles));
 - c. Key scientific advisers to the Northern Ireland government during the pandemic, including the Chief Medical Officer, Professor Sir Michael McBride, and the Chief Scientific Advisor, Professor Ian Young;
 - d. Sir Brandon Lewis, former Secretary of State for Northern Ireland.
10. We are also in the process of sending rule 9 requests to special advisors to individual ministers, such as Emma Little-Pengelly, Dr Philip Weir, Mark Ovens, Stephen McGlade and Dr Dara O'Hagan. We are also in the process of sending rule 9 requests to individuals who the Inquiry understands to have provided data and modelling expertise in Northern Ireland.
11. The Inquiry is grateful to those bodies and individuals who have engaged fully with the requests issued and provided statements and supporting documentation in accordance with the requests. The Module 2C legal team are working at pace to ensure that signed statements and their exhibits are disclosed to Core Participants as soon as possible ahead of the public hearings.
12. The Inquiry wishes to acknowledge that in most cases, these rule 9 requests have required considerable work to be completed within confined and demanding timescales. The Northern Ireland Executive departments, individuals and their legal teams have worked hard to respond to these requests, and the Inquiry is grateful for their cooperation. The Inquiry is aware of the many hours of work required to respond to its requests and is grateful for all efforts made by its rule 9 recipients.
13. That said, the Inquiry has concerns about aspects of this important part of the Module's work. The Module 2C team has made clear to those in receipt of the

requests that the Inquiry expects all matters raised in its requests to be answered fully. Given the relatively short period of time remaining before the Module 2C public hearing commences, where the witness statements do not address all the matters raised in the Rule 9 request and/or there are delays in meeting the Rule 9 requests for documents and witness statements, these difficulties have the potential to disrupt the Inquiry's process unless they are swiftly resolved. It is appropriate that Core Participants are aware of these difficulties.

14. Where a Rule 9 response does not address all of the matters raised in the Rule 9 request, Module 2C has sent, or is in the process of sending, a supplemental Rule 9 request to the organisations or individuals concerned. In others cases, it may be necessary to explore the reasons why there are unanswered questions, or questions which have been answered incompletely, at the hearings.
15. Module 2C has already commenced the disclosure of signed Rule 9 statements and their supporting exhibits to Core Participants, and will continue to do so in advance of the public hearing.

The gathering of documentary evidence from TEO and other Northern Ireland Government departments

16. The following headings highlight a number of important aspects of Module 2C's document disclosure that the Module 2C team wishes to draw to Core Participants' attention.

Disclosure of WhatsApps and potential data loss

17. The Inquiry is aware that any informal communications between key decision-makers and/or their advisers discussing information, advice and the management of the pandemic in Northern Ireland sent during the relevant period may provide important information about, and context to, the decisions and issues which are to be addressed in Module 2C. Where the term "WhatsApps" is referred to below, this is used to encompass all other informal forms of messaging which may have been used to communicate about the response of the Northern Ireland Government to the pandemic, including (but not limited to) WhatsApps, SMS messages, Microsoft Teams chats, iMessage, Slack and Signal messages. This wide definition has been adopted in requests for information and documents issued by Module 2C.

18. In September 2022, Module 2C sent a Rule 9 request to TEO asking to be provided with information concerning the extent to which there was informal communication, including by way of WhatsApp, about significant decisions. Similar requests were made of the Department of Health and the Public Health Agency in October 2022, and the Chief Medical Officer in November 2022.
19. In late July 2023, the Inquiry wrote to TEO as the coordinating department for responses across the Northern Ireland executive departments, requesting detailed information about the use of WhatsApps in connection with Northern Ireland government decision-making during the pandemic, policies surrounding their use and details of groups and individual messaging. This request was subsequently provided to all Northern Ireland government departments for their individual response.
20. In August 2023, TEO notified the Module 2C Legal Team of a potential data loss issue in relation to Northern Ireland Civil Service (**NICS**) supplied devices held by former Executive Ministers and senior Civil Servants. TEO advised that the government-supplied devices of the former First Minister Baroness Arlene Foster and deputy First Minister Michelle O'Neill had at some point been reset to factory settings, meaning no data was available from them. TEO advised they were still working to determine the exact circumstances of how this had occurred, and noted that a number of relevant officials were on leave and so were not available to deal with the matter at that time.
21. TEO's response also outlined the status of a number of other Executive Ministers' devices, and suggested that at least a number of other Executive Ministers' mobile devices had also been subject to a factory reset.
22. Module 2C considered this to be a potentially serious issue which may have resulted in the loss of evidence relevant to the Inquiry. The Legal Team therefore immediately wrote to TEO to express the Inquiry's concerns and asked to be provided with a full explanation of what had occurred and the extent of any data lost. TEO has since initiated an investigation into this issue, which remains ongoing. The Module 2C Legal Team is in regular communication with TEO concerning the progress of the investigation. TEO initially advised that the investigation report would be provided by late October 2023, but has subsequently advised that it will now not be ready until the end of November 2023.

23. As a result of this information, in November 2023 the Inquiry also issued a Rule 9 request to TEO seeking a witness statement providing details of the use of personal and NICS-supplied mobile devices by Northern Ireland government ministers, special advisors and senior civil servants, the policies concerning the use of such devices, the extent of the use of informal messaging systems such as WhatsApp and applicable policies regarding their use, and particularly evidence of the circumstances and extent of the potential data loss incident described above. It also requires disclosure of the investigation report and copies of all relevant informal communications, including messages sent by way of WhatsApp or any other informal messaging platform between TEO Ministers, special advisors, party officials or senior civil servants concerning the management of pandemic during the relevant period. On 21 November 2023, the Module 2C Legal team also sent a similar rule 9 request to all Northern Ireland Executive departments, seeking the same disclosure with respect to WhatsApps sent between their Ministers, special advisors, party officials or senior civil servants concerning the management of pandemic.

24. In addition, throughout October and November 2023, rule 9 requests were issued for disclosure of WhatsApp messages from individual Northern Ireland government witnesses as part of the individual Rule 9 process. The Module 2C team has stressed to those rule 9 recipients the importance of complying with the sections of those requests regarding such communications.

25. Module 2C has started to receive WhatsApp material from some of the Northern Ireland government departments, including TEO. A number of individual witnesses have also provided some evidence as to their use of and retention (or otherwise) of WhatsApps. Module 2C continues to review that material including to understand the extent to which WhatsApps were used to send messages concerning key decisions by some members of the Northern Ireland government, and the extent to which such messages may have been lost. An update of any further information on this issue which is forthcoming after the circulation of this Note will be provided at the Preliminary Hearing.

Notebooks and diaries

26. The Inquiry has made requests for notebooks and diaries from all Northern Ireland government individual witnesses. The Inquiry is not yet in a position to know the full extent to which such materials were used and/or have been retained by all key

Northern Ireland Government witnesses. TEO has confirmed that it has carried out searches for such materials, and TEO's hard copy materials are being made available for physical inspection by the Module 2C Legal team. Where assessed as relevant, copies of pages from TEO's notebooks and diaries will be disclosed to Core Participants ahead of the public hearings.

27. The Module 2C team has included a request for personal notebooks and diaries as part of its rule 9 requests to individuals such as Ministers, special advisors and senior civil servants across the Northern Ireland government which we expect to receive by way of disclosure prior to January 2024. To the extent that other Northern Ireland government departments hold personal notebooks and diaries, under the terms of their Module 2C Rule 9 requests, they must be disclosed to the Inquiry. The Module 2C team will either request a scanned copy be provided, or for the Module 2C Legal team to be provided with access to view the hard copies.
28. The Inquiry has already been provided with Baroness Foster's notebooks in response to requests made by Module 2. These materials have been considered for relevance in Module 2C and any relevant materials will be disclosed to Core Participants.

Disclosure to Core Participants

29. In summary, as part of its ongoing evidence gathering process, Module 2C has received 33,594 documents in total, including:
 - a. 52 questionnaire responses from impact organisations;
 - b. 30 finalised Rule 9 statements (whether disclosed or not); and
 - c. A further 4 witness statements in draft form.
30. The Inquiry has disclosed 10,063 documents in total to Module 2C Core Participants, including:
 - a. 32 Rule 9 statements and supporting documents (including 22 corporate statements, and 10 Module 2 statements relevant to Module 2C); and
 - b. 52 questionnaire responses from impact organisations including those jointly instructed with Modules 2, 2A or 2B.
31. Within the materials disclosed to CPs to date are:

- a. All questionnaire responses received from impact organisations with supporting documents and footnoted materials;
- b. Expert reports relevant to Module 2C that have previously been disclosed in Modules 2, 2A and 2B of this Inquiry; and
- c. Witness statements and supporting materials from Northern Ireland Government departments, the Chief Medical Officer, statutory commissioners, the Northern Ireland Committee of the Irish Congress of Trade Unions, the Health and Safety Executive Northern Ireland, the Speaker of the Northern Ireland Assembly, and other Material Providers.

32. Module 2C will continue to disclose material to Core Participants on a regular basis.

33. Many of the deadlines in the Inquiry's Rule 9 requests for draft statements fall in November and December 2023. As far as it is possible to do so, further up to date information about these statements will be provided at the preliminary hearing. However, save for exceptional circumstances and provided that witnesses comply with the deadlines set, Module 2C expects to have received all draft witness statements in sufficient time to enable disclosure of the vast majority of signed statements in good time in advance of the public hearing.

34. Whilst 10,063 documents have been disclosed across 37 tranches of material, Module 2C has a significant volume of documents left to review, assess for relevance and work through before they can be released to Core Participants.

35. There are also some Material Providers from whom Module 2C has not received the entirety of their general disclosure, pursuant to Annex C of rule 9 requests issued by the module. In particular, the initial Rule 9 request to the Department of Health was issued on 18 October 2022 sought general disclosure of documents relating to operational documents, the making of key decisions, lists of key meetings, communications with the public and reviews and reports. The initial deadline for this rule 9 request was 28 November 2022. Whilst the Department has provided some documents (by way of exhibits to its corporate statements), substantive general disclosure from the Department has not yet been provided. The Module 2C team has engaged with Department of Health's legal representatives in relation to provision of its general disclosure, and has been assured that all general disclosure documents

from the Department of Health for Module 2C will be provided to the Inquiry by Christmas 2023.

36. Save for the materials which it knows to be outstanding, particularly the extant Department of Health disclosure, the resolution of issues regarding WhatsApps and notebooks as outlined above, and anything which results from further requests for disclosure issued, Module 2C expects that it has now received a considerable bulk of the disclosure relevant to it. The legal team is working swiftly to review this material and we wish to put on record our thanks to those Material Providers who are assisting with this important process, and doing so at pace. There remains much to be done and materials will continue to be made available to Core Participants as quickly as possible.

Module 2 Cross-modular disclosure

37. The Inquiry is aware that certain documentary and oral evidence received by Module 2 is likely to be relevant to Module 2C.

38. In order to ensure that Core Participants have access to Module 2 material that is relevant to Module 2C, the Inquiry is conducting a cross-modular review to identify material relevant to Module 2C.

39. The Inquiry intends to disclose any material considered relevant to Module 2C to Core Participants, and indeed has already started to do so. This will include witness statements, exhibits and aspects of general disclosure that has been received by Module 2. This will be a focused process. Material will be provided where it is relevant. For example, a witness statement which discusses issues relevant to Module 2C will be disclosed to Core Participants, but only those exhibits to the statement considered relevant to Module 2C will be disclosed.

List of Issues, plans for the hearings in January 2024, and provisional list of witnesses

List of Issues

40. A list of the proposed issues was circulated to Core Participants on 30 May 2023. Core Participants were asked to provide their comments on that list. We are grateful for the comments provided.
41. The majority of the comments made by Core Participants noted the differences between Module 2C and Module 2's List of Issues, specifically that the Module 2C note provided more granular detail. Some Core Participants asked that the Module 2C List of Issues specifically include some further discrete issues. The Module 2C Legal Team has reviewed the way that the list of issues is drafted and added some additional points. The team is though satisfied that it is sufficiently broad that the majority of issues raised by Core Participants are properly addressed within those broad categories. The Module 2C team is concerned to ensure that it strikes the balance between a detailed List of Issues and being too prescriptive. Having broad consistency with Modules 2, 2A and 2B (whilst also allowing for the consideration of those issues which are particular to Northern Ireland) is also important.
42. Accordingly, and following consideration by the Module 2C team and the Chair, a revised and finalised List of Issues has been provided to Core Participants with this Note.

Provisional witnesses

43. The Module 2C team has written to potential witnesses to give them notice of the dates of the public hearing, and to ask them to provide any dates to avoid. In many cases, this notification has been provided to the witness through their legal representative.
44. The Inquiry has not made any decisions about which witnesses will ultimately be required to give evidence at the Module 2C public hearings. The list of witnesses to whom we have written is provisional only. The Inquiry is still awaiting receipt of further statements, and no final decisions will be made until the Inquiry has received all of the witness statements and considered representations from Core Participants. It is possible that not all of those individuals who have been given advance notice will be

called. It is also possible that some additional individuals may be notified of the Inquiry's intention to call them as witnesses.

45. The Module 2C team proposes to send out a provisional list of witnesses in January 2024 setting out the names of those who may be called to give oral evidence at the Module 2C public hearings. Core Participants will be invited to make observations at that time.

Hearing preparation

46. As previously announced, the hearings in Module 2C will take place in Belfast and commence on Tuesday 30 April 2024, with Monday 29 April 2024 being a non-sitting day. The venue will be the Clayton Hotel, Belfast.
47. Ahead of the hearings, Module 2C intends to provide documents to Core Participants relating to the key thematic areas, which will provide some factual background to the matters being covered in Module 2C. Core Participants will have a chance to consider these before they are finalised. It is likely that this will include a chronology of key decisions and events. In addition, Core Participants will be invited to suggest potential lines of questioning for witnesses in connection with the evidence proposals which will be sent to them in advance of the hearings.
48. Further information and updates in this regard will be set out by Counsel to the Inquiry at the preliminary hearing, and will continue to be provided in the Core Participant monthly update notes issued in due course.

Expert witnesses

49. Module 2C (in conjunction with Modules 2, 2A and 2B) has issued instructions to the following experts who have agreed to provide evidence to the Inquiry on matters related to Northern Ireland, which will also be covered by Module 2C:
 - a. Professor Thomas Hale from the Blavatnik School of Government, University of Oxford, has reported on international data relating to the Covid-19 pandemic, in particular in analysing the effectiveness of the decision-making of the UK and each devolved administration to the Covid-19 pandemic in comparison to other countries. [This report](#) has been disclosed to Core Participants in final form and was presented at Module 2's public hearing on 11 October 2023 (INQ000257925).

- b. Professor Ailsa Henderson from the University of Edinburgh has reported on the political structures for devolution within the UK and mechanisms for inter-governmental decision-making between the UK Government and the devolved administrations during the Covid-19 pandemic. [This report](#) has been disclosed to Core Participants in final form and was presented at Module 2's public hearing on 9 October 2023 (INQ000269372).

50. Expert reports which are not directly relevant to Module 2C but which might nonetheless provide important background were also commissioned from Alex Thomas and Gavin Freeguard. Alex Thomas from the Institute for Government was instructed to report on the decision-making structures of the UK Government in emergency situations, in particular the Cabinet Office, Cabinet Committees and the Office of the Prime Minister. Gavin Freeguard, former Programme Director and Head of Data and Transparency at the Institute for Government, was instructed to report on the access to and use of data by the UK Government during the Covid-19 pandemic. Reports from these two experts have been disclosed to Core Participants in final form (INQ000236243 and INQ000260629). Gavin Freeguard's [report](#) was presented at the Module 2 public hearing on 10 October 2023 and Alex Thomas' [report](#) on 13 October 2023.

51. In her [Ruling](#) of 9 March 2023, the Chair directed that the Inquiry should obtain evidence from an expert, or experts, on "*the nature and degree of pre-pandemic structural racism*" (paragraph 32). The Ruling also makes clear, at paragraphs 36-37, that expert evidence should be obtained regarding pre-existing structural discrimination on other grounds. The following experts have been instructed, including in relation to the matters within the Module 2C scope relating to Scotland. Evidence from these experts has been adduced and led in Module 2:

- a. Professor James Nazroo, Professor of Sociology at the University of Manchester and Deputy Director of the ESRC Centre of Dynamics of Ethnicity, and Professor Laia Becares, Professor of Social Science and Health at King's College London, are contributing expertise on pre-pandemic inequalities by race and ageing, including expertise on the role of structural racism. This report has been disclosed to Core Participants in final form and was presented at the Module 2 public hearing on 5 October 2023 (INQ000280057).

- b. Professor James Nazroo is also contributing expertise on later life. This report has been disclosed to Core Participants in final form (INQ000280058), and was also presented at Module 2's public hearing on 5 October 2023.
- c. Professor Thomas Shakespeare, Professor of Disability Research at the London School of Hygiene and Tropical Medicine, and Professor Nicholas Watson, Associate Professor at the School of Health and Wellbeing at the University of Glasgow, are contributing expertise on pre-pandemic inequalities associated with disabilities. This report has been disclosed to Core Participants in final form and was presented at the Module 2 public hearing on 9 October 2023 (INQ000280067).
- d. Professor Laia Becares is providing expertise on pre-pandemic inequalities for members of the LGBTQ+ community. This report has been disclosed to Core Participants in final form and was presented at the Module 2 public hearing on 9 October 2023 (INQ000280059).
- e. Dr Clare Wenham, Associate Professor of Global Health Policy at the London School of Economics and Political Science, is providing expertise on pre-pandemic gender inequalities. This report has been disclosed to Core Participants in final form and was presented at the Module 2 public hearing on 6 October 2023 (INQ000280066).
- f. Professor David Taylor-Robinson, Professor of Public Health and Policy at the University of Liverpool, is providing expertise on pre-pandemic childhood inequalities. This report has been disclosed to Core Participants in final form and was presented at the Module 2 public hearing on 6 October 2023 (INQ000280060).

52. A further expert report has been disclosed to Core Participants prepared by Professor Chris Brightling (Professor of Respiratory Medicine at the University of Leicester and Chair of the NIHR Respiratory Translational Research Collaboration) and Dr Rachael Evans in relation to Long Covid. This was presented at the Module 2 public hearing on 13 October 2023 (INQ000280198).

53. As explained in previous monthly update notes, the Module 2C team has been exploring the instruction of one or more experts to address some Northern Ireland specific issues which were not the subject of detailed consideration in other reports.

In particular the Module wishes to ensure that there is before the Inquiry expert evidence as to how the government in Northern Ireland functions. Accordingly, the Inquiry has instructed two experts who will prepare a joint report:

- a. Professor Karl O'Connor is a Reader in Public Administration, the Research Director for Social Work and Social Policy (UoA20) and a Co-director of the Centre for Public Administration at Ulster University.
- b. Professor Ann-Marie Gray is a Professor of Social Policy in the School of Criminology, Politics and Social Policy at Ulster University.

54. Their report will explain the overarching, constitutional arrangements which provide for the government of Northern Ireland and will explain power sharing structures and how, practically, these work. They have also been asked to consider the arrangements which were made in Northern Ireland for responding to the pandemic and further questions which relate to Module 2C's List of Issues.

55. Professors O'Connor and Gray have been provided with a letter of instruction to commence preparation of their report and have been asked to prepare a first draft by December 2023, with a final version by 26 January 2024. Professor Gray has also been asked to provide evidence setting out the health inequalities that were evident in Northern Ireland at the time of the outbreak of the pandemic in the UK.

The Listening Exercise (Every Story Matters), Commemoration and Impact Films

56. On 28 July 2023, the Inquiry provided a further update on the ways in which an individual can share their experiences with the Inquiry.

57. Every Story Matters (**ESM**) was formally launched on 13 June 2023. The experiences and stories shared are helping the Inquiry to build a comprehensive picture of how the pandemic affected people's lives across the UK. An updated webform was made available in late May, and to date, thousands of responses have been submitted. The public information campaign to make people aware of ESM has been running on radio, billboards, in the press and digital advertising. The Inquiry has been working with charities and other organisations to promote ESM to seldom heard voices. Campaign activity aimed at raising awareness of ESM will take place in Northern Ireland from the beginning of April 2024 and will run until the end of the Module 2C hearings. A new contract has been awarded to M&C Saatchi to support the advertising of ESM, and a

new research contract has been awarded to Ipsos to help the Inquiry deliver the next phase of ESM.

58. We have recently launched our programme of UK-wide ESM events, which will enable people across the UK to speak to Inquiry staff in person about their experiences of the pandemic. We will be holding events in Northern Ireland in the New Year. A new contract will soon be announced to help the Inquiry deliver further community events.

59. An impact film will be shown on the first day of public hearings for Module 2C to set the tone for subsequent proceedings, grounding them in the lived experience of individuals living in Northern Ireland who suffered, and continue to suffer, hardship and loss as a result of the pandemic. The video will be played publicly at the substantive hearings of the module in April 2024.

Meetings with Core Participants

60. The Module 2C Legal team has met with Module 2C Material Providers, Core Participants and/or their representatives on an *ad hoc* basis throughout the year to discuss any ongoing requests. In order to support Core Participant engagement in the preparation for the Module 2C hearings, Module 2C intends to offer Core Participants the opportunity to convene individual meetings with Counsel instructed for Module 2C. These meetings are designed to enable us to provide information about the plans for the Module 2C hearings and to continue the process of Core Participant engagement with the Module. Details about arranging such meetings will be circulated in due course. It is intended that they will take place in the new year.

21 November 2023

Counsel to the Inquiry

Clair Dobbin KC

Nick Scott BL

Leah Treanor BL

Shirley Tang BL