

Tuesday, 12 December 2023

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2 (1.45 pm)

3 **LADY HALLETT:** Good afternoon. This is the third
4 preliminary hearing into Module 2C, and Ms Clair Dobbin,
5 Counsel to the Inquiry for this module, is going to set
6 out the issues that are going to be put before me this
7 afternoon.

8 **Statement by LEAD COUNSEL TO THE INQUIRY FOR MODULE 2C**

9 **MS DOBBIN:** Thank you, my Lady. I appear today with
10 Nick Scott, and on behalf of the counsel team I just
11 want to welcome those representing core participants who
12 are joining this hearing from Northern Ireland, and
13 of course those who are present before you as well.

14 This is a hybrid hearing, it's being broadcast so
15 that anyone who wants to is able to join it. Of course
16 that means that it's subject to a three-minute delay;
17 that means if anything is said that ought not to be, the
18 feed can be broken. We don't expect anything like that
19 to happen today, but I just thought I'd mention it
20 because these short interruptions can sometimes happen.

21 So before you in the Inquiry room are
22 Mr Peter Wilcock King's Counsel, who represents the
23 Northern Ireland bereaved families for justice,
24 Ms Nessa Fee who appears on behalf of the Executive
25 Office of Northern Ireland, and Ms Charlotte Godber, who

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1 help and engagement, including with me in the lead-up to
2 this hearing. Of course it corresponds with the close
3 of the evidence in Module 2, and the Module 2C team
4 thought that it was important at this juncture and ahead
5 of this hearing to make contact with the other legal
6 teams representing core participants, just asking them
7 to consider or reflect upon any linkage that there was
8 between the issues that had arisen in Module 2 and
9 Module 2C that they might want to raise with us or
10 anything new that had arisen.

11 Plainly what happened in the devolved
12 administrations is the other side of the coin to the
13 events being investigated in Module 2, and it's
14 anticipated that much evidence which you heard in
15 Module 2 will be just as important to those who were
16 involved in making analogue decisions in
17 Northern Ireland and those whose lives were so
18 profoundly affected, both by Covid-19 and government
19 decision-making in Northern Ireland. And if any of my
20 learned friends to whom I've not spoken would wish to
21 make submissions today about that, then of course they
22 would be welcome, but I wanted to emphasise that they
23 will also have that opportunity to discuss those matters
24 with us when the Inquiry team visits Northern Ireland in
25 January to have those meetings, and if I may I'll come

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1 represents the National Police Chiefs' Council.

2 There are a number of core participants who also
3 appear before you today, and by way of remote
4 attendance. A number of these will be familiar to you.

5 Disability Action Northern Ireland are represented
6 by Bhatt Murphy solicitors.

7 Baroness Arlene Foster and Mr Paul Givan are
8 represented by Ms Julie Ellison.

9 Ms Michelle O'Neill is represented by Mr Bassett and
10 Ms O'Flaherty today and Ó Muirugh Solicitors.

11 The Commissioner for Older People for
12 Northern Ireland is represented by Ms Anyadike-Danes
13 King's Counsel.

14 The Northern Ireland Department of Health is also
15 represented, and by Fiona Fee, and the Departmental
16 Solicitor's Office as well.

17 And the Northern Ireland Department of Finance is
18 also represented by Nicolas Hanna and the Departmental
19 Solicitor's Office.

20 My Lady, as you know, the Trades Union Congress and
21 the Northern Ireland Committee and the Irish Congress of
22 Trade Unions are also core participants, but they are
23 not in attendance at today's hearing.

24 My Lady, by way of introduction, may I say how
25 grateful I am to all of my learned friends for their

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1 back to that very shortly.

2 My Lady, you have in your bundle and the legal team
3 has in preparation for this hearing circulated to
4 core participants an updated list of issues, and I want
5 to thank my learned friends again for contributing to
6 that with care. We're all aware that it is an ambitious
7 list, but it ought to assist important witnesses who are
8 in the process of preparing their witness statements,
9 and it ought also to provide the focus for the hearings
10 which will take place in due course, and I'll come back
11 to the detail about those hearings as well.

12 But on the subject of witness statements, I wanted
13 to make clear, if I may, on behalf of the legal team,
14 and wanted to acknowledge at the outset of this hearing,
15 that the Module 2C team has been demanding in terms of
16 what it has asked of government departments and
17 individual witnesses in Northern Ireland. The Inquiry
18 is aware that the absence of power-sharing arrangements
19 has added to pressures on departments and the civil
20 servants, specifically in responding to this Inquiry.

21 Additionally, parts of the Northern Ireland
22 Government and individual witnesses have had to respond
23 to Modules 1, 2 and 3 whilst simultaneously responding
24 and providing disclosure to Module 2C. We're also aware
25 that they don't have comparable resources to those of

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1 the UK Government as well.

2 It's right that we acknowledge that the Executive
3 Office alone has provided already in excess of
4 24,000 documents to Module 2C, and we also know that
5 many of those individuals of whom we have sent detailed
6 Rule 9 requests are, for the most part, public servants
7 and have demanding jobs, and we're conscious and mark
8 that a heavy burden has fallen on the Northern Ireland
9 Chief Medical Officer in this regard.

10 But my learned friends will well understand that
11 this is an Inquiry where that underlying detail matters.
12 We will not and we will never have time in a public
13 hearing to call witnesses to investigate each and every
14 aspect of the decision-making or to take them through
15 every relevant document. That's not realistic.

16 The underlying material is, therefore, necessary in
17 order to inform the detailed questioning of witnesses,
18 for report writing and of course, most important, the
19 making of recommendations as well.

20 The Module 2C legal team has sought to be as
21 accommodating as it possibly can be, given the pressures
22 that Northern Ireland government departments are subject
23 to. We have provided extensions to Rule 9 requests,
24 we've tried to stagger Rule 9 requests as well, but as
25 the hearing gets closer inevitably the ability to afford

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1 which was put to them.

2 Whilst no final decisions have been made about who
3 will be called to give evidence, it is likely that each
4 former minister will be called at the hearings. There
5 will be no hesitation in the hearing about making clear
6 the question which any witness was asked but failed to
7 properly engage with or answer in their written
8 statement. Witnesses who fail to answer questions they
9 have been asked to address in a witness statement will
10 have to account for that failure on oath in the witness
11 box, and they will ultimately have to answer those
12 questions as well.

13 I should also mention, of course, my Lady, that you
14 do have the power to compel the production of written
15 evidence under section 21 of the Inquiries Act 2005.
16 It's hoped that this will not be necessary. Plainly
17 it's in no one's interest, but certainly not those of
18 the witness, to fail to engage in the process of
19 providing detailed evidence in writing prior to giving
20 oral evidence.

21 My Lady, it's worth reflecting, and of course
22 reiterating, that one of the most important reasons why
23 this Inquiry was instituted was to make recommendations
24 and to consolidate that which has been learnt from the
25 response to the pandemic. In its report of

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1 latitude decreases.

2 We wanted to mention that today on behalf of the
3 Inquiry because it's particularly important that former
4 ministers bear this in mind. The Inquiry sent detailed
5 Rule 9 letters to those former ministers, and in respect
6 of a number of them they were about 50 pages long, or
7 longer, contingent on the level or the range of
8 responsibilities that that individual had. Ministers
9 were referred to a number of underlying documents, in
10 order that they could provide a response to the Inquiry
11 that was first of all structured but which also
12 addressed the detailed list of issues which has been
13 circulated.

14 I do want to make it clear that many ministers are
15 in the process of providing their first drafts to
16 the Inquiry, and we haven't had sight of them. So the
17 observations that I make do not apply to all ministers.

18 I wanted to make clear that as part of the
19 preparation for the hearings, and of course to ensure
20 that they're effective, we are closely monitoring the
21 compliance of witness statements with the questions that
22 have been asked in the Rule 9 request whenever a draft
23 comes back. We are in the process of going back to some
24 former ministers because the statements they've provided
25 do not sufficiently engage with the underlying material

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1 9 March 2023, the Northern Ireland Statistics and
2 Research Agency estimated that there were 4,075 excess
3 deaths in Northern Ireland from 1 March 2020 to
4 31 March 2022. In the same period there were
5 5,060 Covid-related deaths in Northern Ireland.

6 My Lady, as you know, having just heard this
7 evidence, Professor Sir Chris Whitty in his evidence in
8 Module 2 said that he perceived a difference between how
9 the UK system collectively approached geopolitical
10 threats like terrorism as compared to how they
11 approached natural threats or hazards. Put simply, if
12 government knew that there was a terrorist event in the
13 planning, and that thousands of people might lose their
14 lives, then that might or would prompt a different
15 sort of response as compared to that of a developing
16 pandemic.

17 You haven't made any findings in Module 2 about
18 those observations, but nonetheless Professor Sir Chris
19 Whitty's framing of the issue might be a helpful one,
20 and one that might resonate also in Northern Ireland.

21 Faced with information that this was a pandemic
22 which might kill thousands, and of course the point at
23 which that was understood by ministers in
24 Northern Ireland is extremely important, did ministers
25 grasp the urgency and respond with alacrity? Did the

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1 civil contingencies arrangement kick in and provide
2 an effective framework within which to manage the
3 pandemic? Fundamentally, were there limitations in the
4 response and what were the reasons for them? To what
5 extent was any response in Northern Ireland conditioned
6 by the response by the UK Government which Module 2 has
7 thrown more light on in the course of its
8 investigations?

9 The position of Northern Ireland during the pandemic
10 was of course completely different to that of the UK,
11 and indeed to the rest of Europe. It affords the
12 Inquiry to consider the unique challenges which present
13 themselves in a post-conflict society and which governs
14 on the basis of power sharing.

15 These are important issues deserving of the most
16 sober and serious consideration, and returning, if
17 I may, to former ministers, their written and oral
18 evidence will obviously be vital for considering all of
19 these important issues and what could be done better in
20 the event of a future pandemic, and of course one which
21 might be more transmissible or have a higher fatality
22 rate, the prospect of which is not fanciful.

23 The people of Northern Ireland are as entitled to
24 full consideration of this as in any other part of
25 the UK, and we on their behalf will strive to get the

1 witnesses before sending them out Rule 9 requests, but
2 indeed been able to put evidence that was heard in
3 Module 2 to some witnesses as well. But as I've said,
4 time is increasingly short.

5 We alerted core participants in the pre-hearing note
6 to the fact that the Department of Health in
7 Northern Ireland had been particularly slow in
8 responding to the Rule 9 request made of it for
9 a witness statement, and the requests made of it for
10 disclosure.

11 I can update you, though, that since that note was
12 circulated, the Department of Health has provided its
13 draft witness statement. It's in three parts and is
14 approximately 527 pages long. The statement exhibits
15 1069 documents. I can also say that the department is
16 in the process of providing its general disclosure, and
17 again that the Module 2C legal team is working with it
18 to ensure that its general disclosure exercise is
19 focused upon the most important categories of material
20 having regard to the Module 2C list of issues. As ever,
21 we try to get the balance right between that disclosure
22 which is unfocused and not helpful and that which will
23 be the most relevant to the list of issues.

24 My Lady, then in terms of the Rule 9 requests, the
25 statements and the exhibits that we have sought and

1 answers to those issues which have been identified.

2 So may I, on behalf of the Inquiry, say to former
3 ministers, and indeed all witnesses, to help the Inquiry
4 by being candid, by putting aside political differences
5 or sensitivities and helping the Inquiry to understand
6 the realities of responding to the pandemic in
7 Northern Ireland. And can I say on behalf of the legal
8 team that our door is always open in terms of providing
9 assistance or guidance or anything that we can do to
10 help achieve this.

11 If I may, then, my Lady, coming back to the meetings
12 that I mentioned in January, the legal team will be
13 there in order to meet core participants and to discuss
14 the hearings which will commence on 30 April 2024. As
15 ever, it's an opportunity for us to listen and to make
16 sure that we have understood any outstanding issues or
17 points that need to be resolved well in advance of the
18 hearing.

19 My Lady, that's all by way of introduction.

20 Can I turn, then, to update. Module 2C is at
21 a critical juncture, the hearings will start in less
22 than five months' time. We of course have the luxury of
23 being the last of the hearings in the devolved
24 administrations, and that has afforded us the
25 opportunity not just to put specific evidence to

1 received, I can tell you that we have sought witness
2 statements from or on behalf of, amongst others, first
3 of all, the Executive Office itself, every government
4 department in Northern Ireland, the Northern Ireland
5 Office, the Public Health Agency, the Health and Safety
6 Executive in Northern Ireland, the Police Service of
7 Northern Ireland, NISRA, which is the statistics agency
8 that I referred to earlier, and the Regulation and
9 Quality Improvement Agency, and that's the body in
10 Northern Ireland which both registers and inspects
11 a range of health and social care services.

12 We've sought statements from former and serving
13 senior civil servants who were central to the response
14 to the pandemic, so amongst a number these include
15 Sir David Sterling and Mr Richard Pengelly.

16 We have sought a statement from Ms Sue Gray, who was
17 the former permanent secretary to the Department of
18 Finance in Northern Ireland, who was on secondment from
19 the Cabinet Office, and who was the second
20 permanent secretary to the Cabinet Office. We hope that
21 she might be able to assist as to some of the
22 significant differences in terms of how the civil
23 service operates at central government as compared to
24 Northern Ireland Government, and also to see if she may
25 provide helpful evidence on the differences in that role

1 in the context of power sharing as well.

2 We've sought statements from the Chief Medical
3 Officer and the Chief Scientific Adviser. We've made
4 a further detailed request of the CMO. We've sought
5 statements from some of those who were involved in
6 actual modelling in Northern Ireland. We've sought
7 statements from specific special advisers, from the
8 former Secretary of State for Northern Ireland,
9 Sir Brandon Lewis, and, most significantly of all,
10 statements from each minister who was in post from the
11 return of power sharing in January 2020 through to 2022.
12 Again, my Lady, as you would expect, we've also sought
13 statements from those organisations who represent the
14 different interests of groups within Northern Irish
15 society as well, and I know a number of these will be
16 familiar to you, but they include the Equality
17 Commission, Mr Eddie Lynch, who is the Commissioner for
18 Older People, who you know, and Disability Action as
19 well.

20 So that's to give you an idea and to give
21 core participants an idea of the extent of the evidence
22 which has been sought. In terms of onward disclosure to
23 our core participants, to date Module 2C has received in
24 excess of 35,000 documents. These include notes and
25 minutes of Executive Committee meetings, the briefing

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1 relevant to Module 2C. So, by way of very simple
2 example, there will be all of the material like the SAGE
3 minutes or advice, the NERVTAG documentation, which will
4 need to be put to certain witnesses in Module 2C as
5 well, or as part of the exercise of ascertaining what
6 information was known in Northern Ireland at or around
7 the same time it was known by the UK Government.

8 I should say that relevant documents from Module 2
9 are also being disclosed in Module 2C on a rolling
10 basis, and of course my learned friends may also wish to
11 flag to us any material in particular that they, on
12 behalf of a core participant, consider to be relevant
13 and important for Module 2C, if by any chance this
14 hasn't been disclosed.

15 My Lady, the Module 2C team is also aware that some
16 core participants were told in Module 2 that some of the
17 questions they sought to ask would be more relevant in
18 Module 2C, and the invitation is made to all my learned
19 friends that it would be helpful if they gave us sight
20 of any questions that they were told should be asked in
21 Module 2C or would be more relevant, and in particular
22 if they flagged up those questions which they regarded
23 as most important and which they didn't get the
24 opportunity to ask. And again, it's just to make sure
25 that we have early sight of that and can think about it

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1 papers that were circulated for ministers for
2 consideration at the Executive Committee meetings,
3 internal departmental briefing papers, notes and minutes
4 of meetings, the advice provided by the CMO, and
5 documents setting out the modelling of the pandemic in
6 Northern Ireland as well.

7 Now, of course, not all of those 35,000 documents
8 will necessarily be relevant and disclosed on.
9 The Inquiry thus far has disclosed over 12,000 documents
10 and of course that process is ongoing and continues.

11 So Module 2C has disclosed a very considerable
12 volume of material, and, my Lady, if I may, I wanted to
13 thank the team of paralegals who have achieved this.
14 They work really hard at a difficult task and one which
15 goes unseen, but they are the engine room of providing
16 disclosure to core participants. And I'm very conscious
17 that the Module 2C team is about to enter a period of
18 really hard work in terms of getting in a number of
19 witness statements and exhibits, and it's right to say
20 and mark that the paralegal team will play a really
21 important part of our work and in enabling us to provide
22 the onward disclosure to core participants.

23 The other part of that work is of course the
24 cross-disclosure from Module 2 as well. There is
25 an obvious body of material from Module 2 that will be

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1 at this stage.

2 My Lady, may I turn, then, to the issue of WhatsApps
3 and other informal forms of communication.

4 My Lady, Module 2C saw some focus on communications
5 via WhatsApp or similar types of communications. These
6 sorts of communications may be of a forensic value in
7 preserving what individuals thought or knew at a given
8 point in time, and in these submissions I will refer to
9 WhatsApp, if I may, as a shorthand for all similar forms
10 of informal communications.

11 Before I address you on that, I think it's
12 important, though, to say that in Module 2C we do have
13 the handwritten notes of the Executive Committee
14 meetings, and these do provide the Inquiry with some
15 insight into the different positions that were taken by
16 ministers when it came to those core important decisions
17 upon which we're focused, and of course convey those
18 decisions which were more particularly fraught.

19 We can see in the underlying notes criticisms that
20 ministers appeared to make of each other or material
21 that they had been provided with, and indeed in
22 Northern Ireland some ministers made public differences
23 of opinion as well.

24 Ultimately, if I can distill it in this way: what
25 the Inquiry is concerned with are those decisions which

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1 ministers actually made, the process by which they made
2 those decisions, the information that was available to
3 them, and the effectiveness of the core Northern Ireland
4 Government response to Covid-19, all to the end to
5 considering what might be done better in the future.

6 There will be many sources of evidence upon which those
7 matters can be assessed, and again the Executive
8 Committee notes will be of great use in that.

9 But turning to WhatsApps, in June 2021, following
10 the Prime Minister's confirmation that a statutory
11 Inquiry into the pandemic would take place, the Director
12 General of Propriety and Ethics in the Cabinet Office,
13 Mr Darren Tierney, wrote to the permanent secretaries of
14 each devolved administration asking them to take steps
15 to ensure that their departments would be ready to meet
16 their obligations when the UK Covid Inquiry began its
17 work, and in particular the departments were asked to
18 ensure that no material of potential relevance to
19 the Inquiry was destroyed.

20 On 20 January 2022, Ben Connah, now Secretary to
21 the Inquiry, wrote to Mr Tierney asking that this
22 message be reiterated across the departments. Mr Connah
23 in particular drew attention to the retention of
24 material, including emails, text or WhatsApp messages
25 and other communications. Following the Inquiry's

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1 WhatsApps in connection with the Northern Ireland
2 Government decision-making during the pandemic. We
3 sought policies surrounding their use and details of
4 groups and individual use of those forms of messaging.
5 This request was subsequently provided by TEO to all
6 Northern Ireland Government departments for their
7 individual response.

8 In August 2023, the Executive Office notified the
9 Module 2C legal team of a potential loss of data in
10 relation to the Northern Ireland civil service-supplied
11 devices that were held by former executive ministers and
12 senior civil servants.

13 TEO informed the Inquiry that the
14 government-supplied devices of the former First
15 Minister, Baroness Arlene Foster, and the deputy First
16 Minister, Ms Michelle O'Neill, had been reset to factory
17 settings. It was said that this was also the position
18 in relation to other ministers and meant that no data
19 was available from those devices.

20 The Module 2C legal team immediately expressed grave
21 concern that this should have occurred, and immediately
22 sought the detail of what had happened.

23 TEO informed the Inquiry that it would ascertain the
24 circumstances in which the data loss arose. This became
25 a formal investigation. A report was initially due to

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1 request, Mr Tierney again wrote to
2 permanent secretaries, both of Whitehall departments and
3 of the devolved administrations, reiterating that
4 message and reminding them of their obligations under
5 the Inquiries Act 2005.

6 My Lady, I should say that the Inquiry's
7 correspondence about this is publicly available on the
8 website as well.

9 In September 2022, Module 2C sent a Rule 9 request
10 to the TEO asking to be provided with information
11 concerning the extent to which there was informal
12 communication, including by way of WhatsApp, and similar
13 requests were made of the Department of Health and the
14 Public Health Agency in October 2022, and the Chief
15 Medical Officer in November 2022 as well.

16 So, in other words, at an early stage, Module 2C
17 sought to understand whether and to what extent these
18 informal channels of communication were used in
19 Northern Ireland as part of the government response to
20 the pandemic, and this was sought so that the legal team
21 had an informed basis then upon which to send Rule 9
22 requests in order to elicit messages. But ultimately
23 the detail that was sought wasn't provided.

24 In late July 2023, the Inquiry wrote to the TEO
25 requesting detailed information about the use of

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1 be provided to the Inquiry in October 2023, but was
2 ultimately provided late on Friday evening just gone,
3 that is 8 December.

4 The Inquiry, in advance of this, had also issued
5 a further Rule 9 request to the Executive Office seeking
6 a witness statement which provided details of the use of
7 personal and civil service-supplied mobile devices by
8 Northern Ireland Government ministers, special advisers
9 and senior civil servants, the policies concerning the
10 use of such devices, the extent of the use of informal
11 messaging systems like WhatsApp and the applicable
12 policies regarding their use, and, particularly,
13 evidence of the circumstances and the extent of the
14 potential data loss incident described above.

15 That draft statement was also due on 8 December, but
16 is now overdue. TEO have indicated to the Inquiry that
17 it will be provided either this week or before
18 Christmas, but, my Lady, the Inquiry will be fixing
19 a date by which that statement must be received.

20 That Rule 9, that request required disclosure of the
21 investigation report and copies of all relevant informal
22 communications, including messages sent by way of
23 WhatsApp or any other informal messaging platform
24 between ministers, advisers, party officials or senior
25 civil servants concerning the management of the pandemic

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1 during the relevant period. And, again, on
2 21 November 2023, the Module 2C legal team sent
3 a similar Rule 9 request across all Northern Ireland
4 departments seeking the same disclosure, and again in
5 respect of the same groups of people as well.

6 My Lady, because the report was only served late on
7 Friday evening, the legal team has had limited ability
8 to analyse its contents and to consider next steps.
9 Plainly it requires very careful consideration, but so
10 too does the witness statement which we expect to
11 receive imminently as well.

12 In addition to all of that, and all of that work
13 which has been done by the Inquiry, in addition to the
14 evidence that has been sought from the Executive Office,
15 in October and November 2023 the detailed Rule 9
16 requests were issued, and that was as part of the
17 general process of sending Rule 9 requests to
18 significant witnesses, including the former ministers,
19 which included a request to them for disclosure of
20 WhatsApp messages from each of those witnesses.

21 It's important to say that in all that approach has
22 begun to yield material. Module 2C has received
23 WhatsApp material from Northern Ireland Government
24 departments, including TEO. A number of individual
25 witnesses, including former ministers, have also

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1 the report produced by the TEO and the witness
2 statement. You may also wish to consider the issue of
3 the resetting devices as part of your overall
4 consideration about the use of informal communications
5 in Module 2C. So I suppose, in other words, you may
6 want to hear evidence or understand more about the
7 extent to which informal communication was used and was
8 regulated, including about the preservation of
9 messaging. You may wish to be able to judge overall the
10 effect of any wiping or resetting devices in light of
11 the material which is disclosed, and having heard from
12 witnesses as to the use of WhatsApps more generally.

13 So, in other words, you may wish to consider these
14 issues in a broader evidential context, and that may be
15 a matter which you wish to keep under review.

16 I should also mention that inspection of the
17 notebooks which TEO has been able to make available has
18 taken place. Some 26 notebooks have been inspected thus
19 far. I think at paragraph 17 of the Executive Office's
20 submissions, it suggests that TEO holds notebooks used
21 by other officials in the event that these may be
22 requested for disclosure. If this is to suggest or
23 gives the appearance that the Inquiry has not been
24 pursuing inspection of all notebooks, it's not correct.

25 On 23 November, after the inspection of the notebooks

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1 provided some evidence as to their use of and retention
2 of WhatsApp messaging as well, and we are in the process
3 of reviewing the WhatsApp material which individual
4 ministers have been provided.

5 So, my Lady, if I may, cutting through this, that
6 some devices have been reset does not mean that there
7 isn't WhatsApp material. There is. But we will
8 continue to work to secure that WhatsApp material which
9 is still available, alongside the separate
10 consideration, of course, as to how certain devices came
11 to be reset in the first instance.

12 Like much in this Inquiry it may be a question of
13 balance and judgement. Whilst WhatsApps can yield
14 nuggets of unvarnished thought or plain speaking, and
15 help to pin down what was known or thought at a given
16 point, and Module 2C wishes to be able to consider the
17 use of informal communications and what they reveal, we
18 do need to be careful that the use of WhatsApp doesn't
19 deflect attention or divert resources away from the long
20 list of serious issues that need to be considered in
21 Module 2C, and the voluminous evidence which does exist
22 about decision-making.

23 My Lady, of course the question of the wiping or the
24 resetting of devices itself remains at large, but you
25 will undoubtedly want to have time to properly consider

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1 took place, the Inquiry asked TEO to confirm that it had
2 provided a complete list of the custodians of notebooks
3 held by the Executive Office. They were asked whether
4 it was contemplated that further notebooks would be made
5 available for inspection at a later date, and
6 the Inquiry has since received from the Executive Office
7 a definitive list of all further custodians of notebooks
8 that are held by the TEO. Obviously further
9 consideration has been given to what of those notebooks
10 should be inspected by the Inquiry.

11 Again, my Lady, I should make clear that all
12 individual witnesses have also been asked that they
13 provide their notebooks or other form of written
14 records, and other Northern Ireland departments have
15 also been asked to provide a list of notebook custodians
16 as well, again to assist the Inquiry as to what further
17 notebooks may be inspected.

18 My Lady, may I turn, then, to the separate issues in
19 terms of the list of issues and plans for the hearing in
20 Northern Ireland, beginning in April, and the
21 provisional list of witnesses.

22 As I said, at the outset, the list of issues in
23 Module 2C is an ambitious one. Ensuring that each issue
24 is investigated and considered will require rigour and
25 discipline on the part of all, in particular at the oral

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1 hearings. A number of core participants commented on
2 the list of issues and the list of issues was amended in
3 light of this. Where suggested changes weren't made, it
4 was because the legal team considered that the issues
5 fell within one of the broader issues that had already
6 been identified. We've sought to strike a balance
7 between a detailed list of issues and being too
8 prescriptive. We've sought consistency where we could
9 with Module 2 and 2A and B, but clearly there are
10 a number of issues which found no analogue in Module 2
11 or the other administrations.

12 As to the oral hearings, they will commence on
13 30 April 2024, they will last for three weeks. They'll
14 take place at the Clayton Hotel, which is in central
15 Belfast.

16 In order to try to assist with the preparation of
17 the hearing, and in order to help focus the hearings and
18 the issues that are of most consequence, we will provide
19 a number of documents as an aid. So we will provide
20 a chronology of key decisions and events, preparation of
21 which is well under way, key statistical information
22 which Counsel to the Inquiry will use in setting out
23 background information about health inequalities on the
24 eve of the pandemic and overall figures, for example,
25 relating to deaths and as they took place at specific

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1 Disability Action Northern Ireland and the Commissioner
2 for Older People will come to the hearings. They will
3 be most welcome.

4 My Lady, in Module 2, a number of experts were also
5 instructed and their evidence will also be relevant to
6 Module 2C. If I may just very briefly touch upon those.

7 As you're aware, Professor Thomas Hale from the
8 Blavatnik School of Government gave evidence in Module 2
9 as to international data relating to the pandemic, and
10 he undertook a comparative analysis of decision-making
11 in the UK and each devolved administration in relation
12 to Covid-19, and he gave evidence and his report was
13 adduced on 11 October in Module 2.

14 Also Professor Ailsa Henderson from the University
15 of Edinburgh gave evidence on devolution within the UK
16 as well, and her report was also adduced in October.

17 Other expert evidence which is of indirect relevance
18 to Module 2C but nonetheless important background was
19 given by Alex Thomas and Gavin Freeguard as well, and
20 that was evidence on the decision-making structures of
21 the UK Government in emergency situations, and in
22 particular how the Cabinet Office, Cabinet committees
23 and the office of the Prime Minister function.
24 Gavin Freeguard provided evidence about access to and
25 use of data by the UK Government during the pandemic.

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1 points in time, and the evidence proposals for witnesses
2 as well.

3 We will circulate in January 2024 a provisional
4 witness list and timetable which the legal team will
5 also be able to discuss with core participants when we
6 meet them next year. The Module 2C team has written to
7 potential witnesses, and again I emphasise potential, to
8 put them on notice of the dates of hearings and to ask
9 them to provide any dates to avoid.

10 No decisions have been made as to which witnesses
11 will ultimately be required to give evidence. As noted,
12 it's likely that all former ministers will be called,
13 given that they comprised the Executive Committee.
14 The Inquiry expects to receive, as I've said, those
15 statements in the coming weeks, and we'll obviously hear
16 representations from core participants as well as to
17 which witnesses ought to be called. So because
18 a witness has been asked to provide dates to avoid, it
19 doesn't mean they will necessarily be called to give
20 evidence. It's also possible that additional witnesses
21 will be identified as well, and required to give
22 evidence, who haven't yet been notified.

23 My Lady, on behalf of the Module 2C team, we also
24 very much hope that those whose interests are
25 represented by organisations like Bereaved Families and

26

1 My Lady, I should point out here that witnesses in
2 Northern Ireland, like the Chief Scientific Adviser and
3 the Chief Medical Officer, have been asked to provide
4 evidence about any limitations on the availability or
5 quality of data in Northern Ireland.

6 My Lady, in your ruling of 9 March 2023 you directed
7 that the Inquiry should obtain evidence from an expert
8 or experts on the nature and degree of pre-pandemic
9 structural racism. Your ruling provided, at
10 paragraphs 36 and 37, that expert evidence should be
11 obtained regarding pre-existing structural
12 discrimination on other grounds and, as you're aware,
13 this led to the Inquiry obtaining expert evidence in
14 relation to a number of different groups across society,
15 and that evidence is also relevant to Northern Ireland
16 as well.

17 Again, if I may summarise, Professor James Nazroo
18 and Professor Laia Bécares provided evidence on
19 pre-pandemic inequalities on grounds of race. That was
20 adduced on 5 October 2023 in Module 2.

21 Professor Thomas Shakespeare and
22 Professor Nicholas Watson provided evidence on
23 pre-pandemic inequalities related to disability, which
24 of course is an important issue in Module 2C.

25 Professor Laia Bécares also provided evidence on

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1 inequalities experienced by the LGBTQ+ community, and
2 again that was adduced in the course of Module 2 as
3 well.

4 Dr Clare Wenham, who is a professor of global health
5 policy at the LSE, provided expert evidence on
6 pre-pandemic gender equalities, and again that was
7 adduced in the course of Module 2.

8 My Lady, I note in relation to gender equality in
9 Northern Ireland, there is a specific issue about the
10 availability of abortion services during the pandemic,
11 and again that is something about which we've sought
12 evidence.

13 Professor David Taylor-Robinson provided evidence on
14 pre-pandemic childhood inequalities.

15 Separate to the commission of evidence on structural
16 inequalities, the Inquiry also obtained expert evidence
17 from Professor Chris Brightling and Dr Rachael Evans on
18 Long Covid as well, and again that was adduced in the
19 course of the Module 2 public hearing.

20 So, my Lady, if I can summarise it in this way: you
21 considered a very broad span of expert evidence in
22 Module 2, and in particular evidence that illuminated
23 the extent to which certain groups within society faced
24 particular systemic disadvantage on the eve of the
25 pandemic, and that will be relevant to Module 2C as

29

1 additional evidence on the issue of health inequalities
2 specific to Northern Ireland as existed at the outbreak
3 of the pandemic.

4 My Lady, we anticipate that they will provide
5 a first draft of their report by the end of
6 December 2023. The aim is that the final version will
7 be available in early 2024, and core participants will
8 have an opportunity to comment on that draft prior to
9 finalisation.

10 My Lady, it's also important and right to mention
11 that of course the issue of the absence of power sharing
12 prior to the pandemic and the impact this had is
13 important to a number of core participants, and
14 of course one of the reasons for that is because of
15 Northern Ireland's health service and the reports that
16 had recommended reform prior to power sharing resuming,
17 which was of course at one and the same time as the
18 pandemic was developing.

19 I suppose, to put it in ordinary language, whether
20 Northern Ireland went into the pandemic 2-nil down on
21 account of the lack of ministerial oversight of health
22 services for the three years prior to the pandemic
23 occurring, and all that I wanted to say was that
24 a number of witnesses have been asked to address that
25 point in their Rule 9s.

31

1 well.

2 In addition, in Module 2C you will also have
3 evidence from organisations who represent such groups or
4 work on the issues which affect those groups as well, so
5 you will have first-hand evidence about that as well.

6 In addition to all of that, the Inquiry has also
7 instructed two experts for the purpose of Module 2C
8 alone. My Lady, those experts are
9 Professor Karl O'Connor, who is a reader in public
10 administration, he is the research director for social
11 work and social policy, and a co-director of the Centre
12 for Public Administration at the Ulster University as
13 well.

14 Professor Ann-Marie Gray is a professor of social
15 policy at the School of Criminology, Politics and Social
16 Policy at the Ulster University. The Inquiry has sought
17 expert evidence from them on the constitutional
18 arrangements which provide for the government in
19 Northern Ireland on power-sharing structures and how,
20 practically, these work. They have been asked to
21 consider the arrangements which were made in
22 Northern Ireland for responding to the pandemic, and
23 further questions relevant to Module 2C's list of
24 issues.

25 We've also asked Professor Gray to provide some

30

1 Finally, then, if I may turn to Every Story Matters
2 and commemoration and the impact film which will be
3 shown at the hearings as well.

4 My Lady, Every Story Matters is the means by which
5 the Inquiry offers to any adult who wishes to the
6 opportunity to provide an account to the Inquiry about
7 their experience of the pandemic. It's by this
8 mechanism that the Inquiry seeks to record and
9 understand how the pandemic affected lives across
10 the UK.

11 An updated web form was made available in late May
12 and thousands of responses have been shared so far.
13 The Inquiry has worked alongside charities and other
14 organisations to encourage people who wouldn't normally
15 come forward to do so, and the Inquiry will undertake
16 further work to raise awareness of Every Story Matters
17 in Northern Ireland from the beginning of April 2024,
18 and I know, my Lady, that you would want to ensure that
19 people in Northern Ireland know that the Inquiry wishes
20 to hear from them. Their voices really matter.

21 And of course there must be many people who would
22 rather put the pandemic behind them, given how awful it
23 was for them, but it's so important that the Inquiry
24 records and preserves that experience, and again uses it
25 to improve any response to future pandemics. And

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1 of course there will be people for whom the pandemic
2 provokes great pain and who continue to grieve, but
3 again, my Lady, I know that you would want those people
4 particularly in Northern Ireland to know how profoundly
5 valued their participation would be.

6 The Inquiry has also launched a pilot programme of
7 UK-wide Every Story Matters events. These will test
8 different ways to enable people across the UK to speak
9 to the Inquiry about what happened in their lives during
10 the pandemic. Some of these events are targeted towards
11 specific groups of people affected by the pandemic and
12 those are open to the general public. The Inquiry has
13 already visited Belfast, of course, to speak with
14 bereaved families and will be holding events in one or
15 two locations across Northern Ireland in the New Year,
16 and detail about this will be provided in the Inquiry's
17 newsletters and on the Every Story Matters events page
18 of the Inquiry's website.

19 The Inquiry team also hopes to pilot the sharing of
20 experiences through British Sign Language in the
21 New Year, an issue of some importance to CPs.

22 My Lady, the hearings will commence on 30 April 2024
23 with a film about the impact that Covid-19 had in
24 Northern Ireland. Although no decisions have yet been
25 made about how many witnesses might be called from these

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1 **Submissions on behalf of the Northern Ireland Covid-19**
2 **Bereaved Families for Justice by MR WILCOCK KC**
3 **MR WILCOCK:** My Lady, as you've just been told, I represent
4 the Northern Ireland Covid-19 Bereaved Families for
5 Justice Campaign.

6 Your Ladyship is, we know, very aware of the
7 importance that those whom I represent place on this
8 module of your Inquiry, particularly given the ongoing
9 political stalemate in Northern Ireland and the fact
10 that a Northern Irish-specific inquiry to provide
11 scrutiny of the actions of the Stormont Assembly during
12 the pandemic is seemingly little closer to reality than
13 it was at the last time you had a preliminary hearing in
14 this module, just under nine months ago.

15 As we have made clear in our written submissions, we
16 note the indication from the Inquiry that this Module 2C
17 is coequal to 2A and 2B, and that insofar as possible
18 and appropriate M2C will pick up issues relating to
19 communication with the Northern Ireland Executive civil
20 service where M2 left off.

21 Can I just start off my response by acknowledging
22 the hard work and effort that your team have put into
23 ensuring that this module can start as planned in April
24 next year, which of course is something those who
25 I represent are particularly anxious takes place.

35

1 organisations, the Inquiry will also hear evidence for
2 and on behalf of the Northern Ireland Covid-19 Bereaved
3 Families for Justice and Disability Action
4 Northern Ireland as well.

5 We hope that the film and this evidence will serve
6 to remind everyone at the outset of the hearing the
7 fundamental reason why this Inquiry matters so much, and
8 why the co-operation of witnesses in the oral hearings
9 is vital.

10 My Lady, if I may, I'll finish on the proposed
11 meetings between the Module 2C legal team and the
12 core participants who wish to speak to us.

13 This will be an important opportunity for CPs to
14 discuss lines of investigation, disclosure and the
15 proposed witness list as well, and we encourage all
16 core participants to meet with us. It will undoubtedly
17 help us in our preparations.

18 My Lady, unless I can assist you any further, may
19 I suggest that you hear from those of my learned friends
20 who would wish to make submissions, and I think you're
21 going to hear from Northern Ireland Covid Bereaved
22 Families for Justice first, and particularly
23 Mr Peter Wilcock who represents them.

24 **LADY HALLETT:** Thank you very much, Ms Dobbin.
25 Mr Wilcock.

34

1 We're also conscious of the efforts they have made
2 to ensure the timely provision of disclosure to all
3 core participants, and their recent meetings with us,
4 with the promise of more to come, to support our
5 clients' engagement with the module and discuss ongoing
6 matters before the final hearings, and we are grateful
7 for those efforts, and they bode well for the
8 co-operation that is to follow.

9 We also acknowledge that in at least two areas the
10 Inquiry has taken into account representations that we
11 have made in previous preliminary hearings, and thus we
12 welcome the instruction of Professors O'Connor and Gray
13 to provide what your counsel has described as the
14 overarching constitutional arrangements which provides
15 for the government of Northern Ireland, as well as
16 an explanation of how the power-sharing structures work
17 in theory and in practice.

18 Could we just ask that in considering these issues
19 and the arrangements which were made in Northern Ireland
20 for responding to the pandemic, those experts be asked
21 to give some explicit thought to the relationships
22 between Belfast, Westminster and Dublin. It may well be
23 it's inherent in what we have been told, but can we just
24 ask, in case it isn't, that some explicit thought be
25 given to that when they produce their reports.

36

1 We note that these reports are expected, I think, by
2 the end of January, and that Professor Gray has been
3 asked to provide evidence setting out the health
4 inequalities that were evident in Northern Ireland at
5 the time of the outbreak of the pandemic, which is
6 a matter your Ladyship knows is of utmost concern to
7 those whom I represent.

8 Then finally, we are grateful that at least some of
9 the issues we have previously flagged up have been
10 acknowledged in the revised and finalised indicative
11 list of issues, and it is ambitious and we're grateful
12 for that ambition, and we also note that, in spite of
13 its ambition, it explicitly states that it will be kept
14 under review to perhaps be even more ambitious in the
15 future, and no doubt you won't be surprised that we
16 would seek to make representations if they are required.

17 We welcome your team's update on the wide range of
18 Rule 9 requests that have been made, and particularly
19 those that have been made following representations we
20 have previously made to Robin Swann, Sue Gray and
21 Brandon Lewis in particular.

22 In relation to the latter, can I draw your attention
23 to the potential for his evidence to fill the gaps in
24 the issue that we have set out in paragraphs 6 and 7 of
25 our written note. My Lady, it will be a theme of my

37

1 material and disclosure at the 12th hour, precluding the
2 effective and adequate consideration that my clients are
3 yearning for in the absence that I've previously
4 described.

5 To that end we are grateful for my learned friend's
6 comments that they are closely and your team is closely
7 monitoring the compliance of the provision of witness
8 statements with the questions actually asked and
9 obviously required in the Rule 9 requests.

10 My Lady, for reasons of brevity only I will not
11 repeat them orally, but I trust you understand, the
12 possibly trenchant comments that we have already set out
13 in paragraphs 9 and 10 of our written note. They are
14 expressed in that way because they really do -- and
15 the Inquiry -- no one must underestimate the concerns of
16 a very large number of those who I represent about the
17 atmosphere that is created by such delay in the context
18 of this Inquiry.

19 The same can be said in relation to the history and
20 the extent of the data loss that your counsel has
21 outlined to us this afternoon. Our clients have similar
22 concerns about the ongoing difficulties, to put it
23 euphemistically, of what CTI have rightly described in
24 a wide sense as informal means of government messaging
25 and the apparent factory resetting of devices linked to

39

1 oral representations to you that I'm not going to repeat
2 what is already in front of you in writing simply for
3 the sake of it, in the knowledge that I know that having
4 drawn your attention to it your Ladyship will of course
5 read that note.

6 However, that said, those that I represent share
7 the Inquiry's concern that, although we don't seek to
8 either, one, minimise the -- I think it's rightly
9 called -- vast amount of work required or, two, the
10 efforts of those involved, or, three, the practical and
11 financial challenges presented by the lack of
12 a functioning government in Northern Ireland, we do
13 share your team's concern as just expressed that
14 the Inquiry's process is not disrupted by Rule 9
15 requests not being complied with as fully and
16 expeditiously as is obviously required and should be
17 possible.

18 Ms Dobbin has already stated that the fact that we
19 are the last module in this phase of the Inquiry may
20 of course help by giving us a little extra time, but
21 given the individuals and departments have been on
22 notice of what is required of them in this module for
23 a considerable time, we urge them to provide all
24 outstanding material as a matter of urgency so that
25 there isn't an onslaught, as it were, of outstanding

38

1 the former First and deputy First Ministers as well as
2 a number of Executive officers.

3 We note that although CTI's note stated and we've
4 just been told that the consequent report of the
5 investigation by the Executive Office would be ready by
6 November 2023, that date has passed, and it is yet to be
7 disclosed.

8 I'm not going to go to it in any detail. Our
9 concern is self-evident and set out in writing. But we
10 do repeat our observation that, without pre-judging the
11 content of those investigations, it may well be
12 insufficient or at least insufficiently independent, to
13 assuage the concerns of those that I represent and
14 indeed the wider public as to how and why there was such
15 apparently widespread deletion of material, to do
16 anything other than have an independent report, and we
17 trust that the Inquiry will actively consider whether
18 an independent examination will be required, and that
19 the procedure that's presently ongoing is brought to
20 a close sufficiently far away from the Inquiry not to
21 make such an independent report impractical, and I know
22 I need not have said it.

23 So we understand that, following the further Rule 9
24 requests, the Inquiry has started to receive some
25 WhatsApp material and evidence from a number of

40

1 witnesses as to their use and retention of such
2 material, but we're anxious that any investigation takes
3 place as soon as possible.

4 I suppose what I'm really saying is whilst we
5 acknowledge the efforts being put into bottoming out
6 this issue, we trust the Inquiry will be equally
7 cognisant of the desire of our clients to have a clear
8 idea of the extent to which such obviously potentially
9 relevant evidence has indeed been lost, and with that in
10 mind I specifically draw your attention to the comments
11 we've set out in paragraphs 12 and 13 of our written
12 note.

13 The Inquiry will not and ought not to be reticent in
14 reminding any recalcitrant material providers of its
15 considerable powers of enforcement, and in any event we
16 trust that the Inquiry's optimism that complete
17 disclosure of the vast majority of signed statements and
18 relevant material can be made in good time proves to be
19 well-founded, particularly given the imminent Christmas
20 interruptions and the need for the Inquiry to review
21 what it receives before, we quite understand, it can be
22 made available to core participants.

23 With all that in mind, may I make a suggestion: we
24 wonder whether or not a further preliminary hearing
25 might be appropriate, given the uncertainties on this

41

1 number of days presently available within the listing.
2 Nevertheless, I urge the Inquiry to not use that as
3 a reason to give full consideration to the request we
4 make at paragraph 24 of our written submissions, that
5 for the reasons there set out it would be beneficial for
6 the Inquiry to call more than one witness from the
7 Northern Ireland Covid-19 Bereaved Families for
8 Justice campaign in Module 2C.

9 This is a matter -- I started my address to you by
10 explaining the sensitivities of this module to those
11 that I represent uniquely within the United Kingdom, and
12 for the reasons I set out we do ask you to consider that
13 topic.

14 In the meantime, we will continue to work hard
15 alongside your team to be ready to start the module at
16 the end of April next year, and will continue to
17 facilitate such productive meetings which can not only
18 help avoid misunderstandings but also help maximise the
19 efficient use of what will be precious Inquiry hearing
20 time.

21 You, my Lady, are aware of the stance that those
22 that I represent have taken on the awarding and of
23 contracts for Every Story Matters, they're set out in
24 the written representations, I'm not going to repeat
25 them. I will simply say that, in spite of that,

43

1 topic, so that matters can be kept under review in the
2 course of a hearing, and that any developments can be
3 assessed with the most up-to-date information that is
4 then available. But I float that in the light of what
5 your counsel has said.

6 I move on to my next topic, witnesses.

7 We note and understand that no final decisions about
8 which witnesses will ultimately be called can be or have
9 yet to be made, and we are grateful for the indication
10 that any observations we may seek to make on this issue
11 can be made hopefully next month.

12 May we take it, and as I speak it's not altogether
13 clear that we will, but may we take it that we may at
14 this stage also make appropriate representations as to
15 whether any of the expert witnesses who the Inquiry has
16 already heard of as part of Module 2 -- and I'm thinking
17 particularly of Professors Henderson and Hale -- might
18 be asked to give further oral evidence updating the
19 evidence that was received in Module 2 during the M2C
20 hearings.

21 But, my Lady, that is a matter we flag up at this
22 stage and of course can be revisited as and when it
23 proves to be an issue.

24 So far as the hearings are concerned, you are
25 already aware of our continuing concerns about the

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1 of course, my Lady is aware that we will try to look at
2 the phrasing that's in the written document. In terms
3 of the impact film we are very willing to work with
4 the Inquiry with a view to repeating the successful
5 impact films that have been put in M1 and M2, and our
6 members were involved in those then and will continue to
7 be involved to the extent that they can.

8 So, my Lady, I said I was going to be half an hour,
9 I'm not, and it really is simply because we've taken
10 a decision that having put such material in writing
11 we're not going to improve on it orally.

12 Unless there are any further matters that I can
13 assist you with, I would simply conclude by referring
14 you to all the points I haven't orally mentioned, which
15 are set out in the extensive written representations
16 that we've made.

17 **LADY HALLETT:** Thank you very much indeed, Mr Wilcock. As
18 you know by now, I really do appreciate such
19 a constructive and focused approach. I'm very grateful.

20 **MR WILCOCK:** Thank you.

21 **LADY HALLETT:** If the stenographer will forgive me,
22 Ms Fee -- where are you? That way -- we'll start,
23 I think. How long roughly do you think you'll be,
24 Ms Fee?

25 **MS FEE:** Five minutes.

44

1 **LADY HALLETT:** Oh, certainly.

2 **Submissions on behalf of The Executive Office Northern**
3 **Ireland by MS FEE**

4 **MS FEE:** My Lady, I appear on behalf of the Executive Office
5 of Northern Ireland. I'm instructed by Joan MacElhatton
6 of the Departmental Solicitor's Office in Belfast.

7 My Lady, the Executive Office is one of the nine
8 departments within the government structure of
9 Northern Ireland as was determined by the Good Friday
10 Agreement. Unlike the Cabinet Office, it has no general
11 central co-ordinating or synthesising role as regards
12 the other eight departments. However, in an effort to
13 assist the Inquiry, the Executive Office welcomes the
14 opportunity to make the following observations which are
15 also made on behalf of four of those other departments
16 who do not have core participant status in Module 2C,
17 and that is the departments for Communities, Justice,
18 Education and Infrastructure.

19 My Lady, turning firstly to the Rule 9 requests for
20 statements and exhibits, since September 2022 the
21 Executive Office team has been working hard to assist
22 the Inquiry by providing a very large volume of evidence
23 including corporate and individual statements and
24 extensive documentation. The Executive Office received
25 the Rule 9 request for its corporate statement in

45

1 the corporate statement, the Executive Office is working
2 to respond to the request for a further corporate
3 statement regarding informal messaging and potential
4 data loss and seven further individual statements.

5 In addition, the Executive Office has, over the last
6 year, provided approximately 25,000 documents to
7 the Inquiry by way of general disclosure and exhibits to
8 statements. The Executive Office would observe that
9 this has been a mammoth task, and in many instances the
10 Rule 9 requests comprise of hundreds of questions which
11 are various and wide-ranging, including the
12 constitutional peculiarities of Northern Ireland.

13 The Executive Office has worked hard to facilitate
14 witnesses with access to the information and
15 documentation they no longer have, and that process has
16 also been undertaken for both the former First and
17 deputy First Ministers, who are separately represented
18 at this Inquiry.

19 The departments for Communities, Infrastructure,
20 Justice and Education have provided all discovery and
21 statements within the agreed time periods, and are now
22 working to complete the current Rule 9 requests by
23 8 January.

24 Secondly, my Lady, in relation to that informal
25 communication, the Executive Office has received that

47

1 September 2022 and submitted a first draft by the end of
2 October 2022. There followed 54 questions from
3 the Inquiry legal team in March 2023, which resulted in
4 a significant body of work to respond and incorporate
5 into the statement, which was filed on 2 October 2023.
6 Two questions have been returned from the Inquiry team
7 in relation to the impact of the lack of an Executive
8 prior to the pandemic, and those are currently being
9 addressed and also should be addressed in the
10 forthcoming witness statements.

11 Also during this period, my Lady, the Executive
12 Office were complying with their obligations as
13 a core participant to Module 1. At the same time, the
14 Executive Office is a core participant at Module 2 and
15 has worked hard to digest both the oral and documentary
16 evidence throughout. The extent of work involved in
17 co-operating with the Inquiry's modules to date has been
18 vast for what is a very small jurisdiction with
19 a proportionately small team. It goes without saying
20 that, absent a government in Northern Ireland since
21 February 2022, the conditions in which the Executive
22 Office and all the other departments are operating in
23 response to this significant Inquiry, most notably the
24 financial conditions, are less than ideal.

25 In relation to Module 2C, to date, in addition to

46

1 Rule 9 request for a statement from the head of the
2 civil service of Northern Ireland, and that is in
3 relation to the informal communications and potential
4 data loss.

5 The head of the civil service had commissioned
6 an internal Northern Irish civil service-wide
7 investigation into the use of and retention or loss of
8 data within informal messaging systems on the part of
9 all former ministers and special advisers from all of
10 the Northern Ireland Government departments. That
11 investigation culminated in a report which has been
12 shared and work is now under way within those
13 departments to retrieve any available data from those
14 devices.

15 At the same time the Executive Office is working to
16 provide the Inquiry team with all informal messaging and
17 equivalent material in its possession. All
18 Executive Office witnesses have addressed the matter in
19 their witness statements. Senior civil servants from
20 the Executive Office department have provided
21 172 strands of messages to date. Following a review by
22 the team, a small number of messages have been
23 identified that may be in scope and those will be
24 uploaded in the coming days.

25 The departments of Education, Justice,

48

1 Infrastructure and Communities have provided some
2 messages and are continuing that process of uploading
3 their informal communications.

4 Thirdly, my Lady, in relation to the notebooks and
5 diaries, the Executive Office and the other departments
6 for whom I appear today will provide all available
7 notebooks and diaries to the Inquiry.

8 In relation to statements, in particular those from
9 the former two ministers from other departments which
10 has been raised to your Ladyship today, the matter will
11 receive urgent action.

12 Finally, my Lady, in relation to the hearings in
13 April 2024, Modules 1 and 2 have demonstrated the vast
14 nature of the task involved in consideration of
15 discovery, the preparation of witnesses, marshalling
16 statements and exhibits, digesting evidence proposals
17 and participating fully in the hearings. The Executive
18 Office is grateful for the regular meetings they have
19 had with the Inquiry team in furtherance of the
20 preparation for Module 2C and appreciates the patient
21 and collaborative approach they have shown our team, and
22 that has been replicated in my discussions with
23 Ms Dobbin King's Counsel and Mr Scott.

24 The Executive Office and the other departments for
25 whom I speak today are determined to properly assist

1 people can alert me.

2 **MS DOBBIN:** Of course.

3 My Lady, unless I can assist you any further.

4 **LADY HALLETT:** No, I'm extremely grateful again to anybody,
5 and I really do endorse the collaborative approach and
6 the idea of the meetings, I think it's very much the way
7 forward when you all have such a huge task.

8 So thank you all very much. That completes this
9 preliminary hearing.

10 **(3.00 pm)**

11 **(The hearing concluded)**

1 your Inquiry and welcome you and your team to Belfast in
2 April.

3 Unless I can assist you any further, my Lady.

4 **LADY HALLETT:** No, thank you very much indeed, Ms Fee, very
5 grateful.

6 Anything further from you, Ms Dobbin?

7 **Reply statement by LEAD COUNSEL TO THE INQUIRY FOR MODULE 2C**

8 **MS DOBBIN:** My Lady, if I may, I'm of course very grateful
9 to my learned friends for the care with which they have
10 addressed you, and I'm grateful to my learned friend
11 Mr Wilcock as well for raising some of those issues,
12 which I think will probably be very useful for us to
13 discuss in January, particularly when he has had sight
14 of the expert report that the core participants will be
15 able to comment on, and will be able to judge maybe
16 a bit better any other issues that arise, for example,
17 in respect of Professor Henderson or Professor Hale.

18 As regards having a further hearing, my Lady,
19 I think we're confident that that will not be necessary.
20 We're confident that we're able to keep a sufficient
21 eye, as it were, on how things are developing. But
22 again, those are matters about which we will be able to
23 develop -- sorry, we'll be able to update
24 core participants on in January as well.

25 **LADY HALLETT:** And if it becomes necessary, then obviously

INDEX

	PAGE
1	
2	
3	Statement by LEAD COUNSEL TO THE INQUIRY FOR 1
4	MODULE 2C
5	
6	Submissions on behalf of the Northern Ireland 35
7	Covid-19 Bereaved Families for Justice by MR
8	WILCOCK KC
9	
10	Submissions on behalf of The Executive Office 45
11	Northern Ireland by MS FEE
12	
13	Reply statement by LEAD COUNSEL TO THE INQUIRY .. 50
14	FOR MODULE 2C
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

LADY HALLETT: [8] 1/3 34/24 44/17 44/21 45/1 50/4 50/25 51/4 MR WILCOCK: [2] 35/3 44/20 MS DOBBIN: [3] 1/9 50/8 51/2 MS FEE: [2] 44/25 45/4	2A [2] 25/9 35/17 2B [1] 35/17 2C [50] 1/4 1/8 3/3 3/9 4/15 4/24 5/4 5/20 10/20 11/17 11/20 13/23 14/11 14/17 15/1 15/4 15/9 15/13 15/15 15/18 15/21 16/4 16/12 18/9 18/16 19/9 19/20 21/2 21/22 22/16 22/21 23/5 24/23 26/6 26/23 27/6 27/18 28/24 29/25 30/2 30/7 34/11 35/16 43/8 45/16 46/25 49/20 50/7 52/4 52/14 2C's [1] 30/23	29/11 30/5 32/6 33/9 33/16 33/23 33/25 39/16 39/22 42/7 42/25 50/22 above [1] 20/14 absence [3] 4/18 31/11 39/3 absent [1] 46/20 access [2] 27/24 47/14 accommodating [1] 5/21 account [4] 7/10 31/21 32/6 36/10 achieve [1] 10/10 achieved [1] 14/13 acknowledge [4] 4/14 5/2 36/9 41/5 acknowledged [1] 37/10 acknowledging [1] 35/21 across [6] 17/22 21/3 28/14 32/9 33/8 33/15 Act [2] 7/15 18/5 action [5] 2/5 13/18 27/1 34/3 49/11 actions [1] 35/11 actively [1] 40/17 actual [1] 13/6 actually [2] 17/1 39/8 added [1] 4/19 addition [6] 21/12 21/13 30/2 30/6 46/25 47/5 additional [2] 26/20 31/1 Additionally [1] 4/21 address [4] 7/9 16/11 31/24 43/9 addressed [5] 6/12 46/9 46/9 48/18 50/10 adduced [6] 27/13 27/16 28/20 29/2 29/7 29/18 adequate [1] 39/2 administration [4] 17/14 27/11 30/10 30/12 administrations [4] 3/12 10/24 18/3 25/11 adult [1] 32/5 advance [2] 10/17 20/4 advice [2] 14/4 15/3 Adviser [2] 13/3 28/2 advisers [4] 13/7 20/8 20/24 48/9 affect [1] 30/4 affected [3] 3/18 32/9 33/11 afford [1] 5/25 afforded [1] 10/24 affords [1] 9/11	after [1] 23/25 afternoon [3] 1/3 1/7 39/21 again [20] 4/5 11/17 13/12 15/24 17/7 18/1 21/1 21/4 24/11 24/16 26/7 28/17 29/2 29/6 29/11 29/18 32/24 33/3 50/22 51/4 agency [5] 8/2 12/5 12/7 12/9 18/14 ago [1] 35/14 agreed [1] 47/21 Agreement [1] 45/10 ahead [1] 3/4 aid [1] 25/19 Ailsa [1] 27/14 aim [1] 31/6 alacrity [1] 8/25 alert [1] 51/1 alerted [1] 11/5 Alex [1] 27/19 Alex Thomas [1] 27/19 all [41] 2/25 4/6 6/11 6/17 9/18 10/3 10/19 12/3 13/9 14/7 15/2 15/18 16/9 17/4 19/5 20/21 21/3 21/12 21/12 21/21 23/24 24/7 24/11 24/25 26/12 30/6 31/23 34/15 36/2 38/23 41/23 44/14 46/22 47/20 48/9 48/9 48/16 48/17 49/6 51/7 51/8 alone [2] 5/3 30/8 alongside [3] 22/9 32/13 43/15 already [8] 5/3 25/5 33/13 38/2 38/18 39/12 42/16 42/25 also [51] 2/2 2/14 2/18 2/22 3/23 4/9 4/24 5/4 6/11 7/13 8/20 11/15 12/24 13/12 15/9 15/10 15/15 19/17 20/4 20/15 21/25 23/2 23/16 24/12 24/15 26/5 26/20 26/23 27/4 27/5 27/14 27/16 28/15 28/25 29/16 30/2 30/6 30/25 31/10 33/6 33/19 34/1 36/1 36/9 37/12 42/14 43/18 45/15 46/9 46/11 47/16 although [3] 33/24 38/7 40/3 altogether [1] 42/12 always [1] 10/8 am [1] 2/25 ambition [2] 37/12	37/13 ambitious [4] 4/6 24/23 37/11 37/14 amended [1] 25/2 amongst [2] 12/2 12/14 amount [1] 38/9 analogue [2] 3/16 25/10 analyse [1] 21/8 analysis [1] 27/10 Ann [1] 30/14 answer [3] 7/7 7/8 7/11 answers [1] 10/1 anticipate [1] 31/4 anticipated [1] 3/14 anxious [2] 35/25 41/2 any [29] 3/7 3/19 7/6 8/17 9/5 9/24 10/16 15/11 15/13 15/20 20/23 23/10 26/9 28/4 32/5 32/25 34/18 40/8 41/2 41/14 41/15 42/2 42/10 42/15 44/12 48/13 50/3 50/16 51/3 Anyadike [1] 2/12 anybody [1] 51/4 anyone [1] 1/15 anything [6] 1/17 1/18 3/10 10/9 40/16 50/6 apparent [1] 39/25 apparently [1] 40/15 appear [4] 1/9 2/3 45/4 49/6 appearance [1] 23/23 appeared [1] 16/20 appears [1] 1/24 applicable [1] 20/11 apply [1] 6/17 appreciate [1] 44/18 appreciates [1] 49/20 approach [4] 21/21 44/19 49/21 51/5 approached [2] 8/9 8/11 appropriate [3] 35/18 41/25 42/14 approximately [2] 11/14 47/6 April [9] 10/14 24/20 25/13 32/17 33/22 35/23 43/16 49/13 50/2 April 2024 [2] 32/17 49/13 are [57] areas [1] 36/9 arise [1] 50/16 arisen [2] 3/8 3/10						
1 1 March 2020 [1] 8/3 1.45 pm [1] 1/2 10 [1] 39/13 1069 documents [1] 11/15 11 October [1] 27/13 12 [1] 41/11 12 December 2023 [1] 1/1 12,000 documents [1] 14/9 12th [1] 39/1 13 [1] 41/11 17 [1] 23/19 172 strands [1] 48/21 19 [9] 3/18 17/4 27/12 33/23 34/2 35/1 35/4 43/7 52/7	3 3.00 pm [1] 51/10 30 April 2024 [3] 10/14 25/13 33/22 31 March 2022 [1] 8/4 35,000 documents [2] 13/24 14/7 36 [1] 28/10 37 [1] 28/10	after [1] 23/25 afternoon [3] 1/3 1/7 39/21 again [20] 4/5 11/17 13/12 15/24 17/7 18/1 21/1 21/4 24/11 24/16 26/7 28/17 29/2 29/6 29/11 29/18 32/24 33/3 50/22 51/4 agency [5] 8/2 12/5 12/7 12/9 18/14 ago [1] 35/14 agreed [1] 47/21 Agreement [1] 45/10 ahead [1] 3/4 aid [1] 25/19 Ailsa [1] 27/14 aim [1] 31/6 alacrity [1] 8/25 alert [1] 51/1 alerted [1] 11/5 Alex [1] 27/19 Alex Thomas [1] 27/19 all [41] 2/25 4/6 6/11 6/17 9/18 10/3 10/19 12/3 13/9 14/7 15/2 15/18 16/9 17/4 19/5 20/21 21/3 21/12 21/12 21/21 23/24 24/7 24/11 24/25 26/12 30/6 31/23 34/15 36/2 38/23 41/23 44/14 46/22 47/20 48/9 48/9 48/16 48/17 49/6 51/7 51/8 alone [2] 5/3 30/8 alongside [3] 22/9 32/13 43/15 already [8] 5/3 25/5 33/13 38/2 38/18 39/12 42/16 42/25 also [51] 2/2 2/14 2/18 2/22 3/23 4/9 4/24 5/4 6/11 7/13 8/20 11/15 12/24 13/12 15/9 15/10 15/15 19/17 20/4 20/15 21/25 23/2 23/16 24/12 24/15 26/5 26/20 26/23 27/4 27/5 27/14 27/16 28/15 28/25 29/16 30/2 30/6 30/25 31/10 33/6 33/19 34/1 36/1 36/9 37/12 42/14 43/18 45/15 46/9 46/11 47/16 although [3] 33/24 38/7 40/3 altogether [1] 42/12 always [1] 10/8 am [1] 2/25 ambition [2] 37/12	2 2 October 2023 [1] 46/5 2-nil [1] 31/20 20 January 2022 [1] 17/20 2005 [2] 7/15 18/5 2020 [2] 8/3 13/11 2021 [1] 17/9 2022 [10] 8/4 13/11 17/20 18/9 18/14 18/15 45/20 46/1 46/2 46/21 2023 [13] 1/1 8/1 18/24 19/8 20/1 21/2 21/15 28/6 28/20 31/6 40/6 46/3 46/5 2024 [7] 10/14 25/13 26/3 31/7 32/17 33/22 49/13 21 [1] 7/15 21 November 2023 [1] 21/2 23 November [1] 23/25 24 [1] 43/4 24,000 documents [1] 5/4 25,000 documents [1] 47/6 26 [1] 23/18	4 4,075 [1] 8/2	5 5 October 2023 [1] 28/20 5,060 Covid-related [1] 8/5 50 pages [1] 6/6 527 pages [1] 11/14 54 questions [1] 46/2	6 6 December [2] 20/3 20/15 6 January [1] 47/23	7 7 March 2023 [2] 8/1 28/6 7s [1] 31/25	8 8 December [2] 20/3 20/15 8 January [1] 47/23	9 9 March 2023 [2] 8/1 28/6 9s [1] 31/25	A ability [2] 5/25 21/7 able [12] 1/15 11/2 12/21 22/16 23/9 23/17 26/5 50/15 50/15 50/20 50/22 50/23 abortion [1] 29/10 about [30] 3/21 4/11 6/6 7/2 7/5 8/17 14/17 15/25 18/7 18/25 22/22 23/4 23/6 23/8 25/23 27/24 28/4 29/9

A	avoid [3] 26/9 26/18 43/18	17/20	called [8] 7/3 7/4 26/12 26/17 26/19 33/25 38/9 42/8	41/7 42/13
Arlene [2] 2/7 19/15	awarding [1] 43/22	beneficial [1] 43/5	came [2] 16/16 22/10	clearly [1] 25/9
Arlene Foster [2] 2/7 19/15	aware [10] 4/6 4/18 4/24 15/15 27/7 28/12 35/6 42/25 43/21 44/1	bereaved [9] 1/23 26/25 33/14 34/2 34/21 35/2 35/4 43/7 52/7	campaign [2] 35/5 43/8	clients [3] 39/2 39/21 41/7
arose [1] 19/24	awareness [1] 32/16	better [3] 9/19 17/5 50/16	can [34] 1/18 1/20 5/21 10/7 10/9 10/20 11/11 11/15 12/1 15/25 16/19 16/24 17/7 22/13 29/20 34/18 35/21 35/23 36/23 37/22 39/19 41/18 41/21 42/1 42/2 42/8 42/11 42/22 43/17 44/7 44/12 50/3 51/1 51/3	clients' [1] 36/5
around [1] 15/6	away [2] 22/19 40/20	between [7] 3/8 8/8 11/21 20/24 25/7 34/11 36/22	care [3] 4/6 12/11 50/9	close [2] 3/2 40/20
arrangement [1] 9/1	awful [1] 32/22	Bhatt [1] 2/6	careful [2] 21/9 22/18	closely [3] 6/20 39/6 39/6
arrangements [5] 4/18 30/18 30/21 36/14 36/19	B	Bhatt Murphy [1] 2/6	case [1] 36/24	closer [2] 5/25 35/12
as [109]	back [5] 4/1 4/10 6/23 6/23 10/11	bit [1] 50/16	categories [1] 11/19	CMO [2] 13/4 14/4
ascertain [1] 19/23	background [2] 25/23 27/18	Blavatnik [1] 27/8	central [4] 12/13 12/23 25/14 45/11	co [5] 30/11 34/8 36/8 45/11 46/17
ascertaining [1] 15/5	balance [3] 11/21 22/13 25/6	Blavatnik School [1] 27/8	Centre [1] 30/11	co-operating [1] 46/17
aside [1] 10/4	Baroness [2] 2/7 19/15	bode [1] 36/7	certain [3] 15/4 22/10 29/23	co-operation [2] 34/8 36/8
ask [6] 15/17 15/24 26/8 36/18 36/24 43/12	basis [3] 9/14 15/10 18/21	body [3] 12/9 14/25 46/4	candid [1] 10/4	co-ordinating [1] 45/11
asked [19] 4/16 6/22 7/6 7/9 15/20 17/17 24/1 24/3 24/12 24/15 26/18 28/3 30/20 30/25 31/24 36/20 37/3 39/8 42/18	Bassett [1] 2/9	both [5] 3/18 12/10 18/2 46/15 47/16	care [3] 4/6 12/11 50/9	coequal [1] 35/17
asking [4] 3/6 17/14 17/21 18/10	be [115]	bottoming [1] 41/5	careful [2] 21/9 22/18	cognisant [1] 41/7
aspect [1] 5/14	bear [1] 6/4	box [1] 7/11	case [1] 36/24	coin [1] 3/12
Assembly [1] 35/11	became [1] 19/24	Brandon [2] 13/9 37/21	categories [1] 11/19	collaborative [2] 49/21 51/5
assessed [2] 17/7 42/3	because [9] 1/20 6/3 6/24 21/6 25/4 26/17 31/14 39/14 44/9	Brandon Lewis [1] 37/21	central [4] 12/13 12/23 25/14 45/11	collectively [1] 8/9
assist [11] 4/7 12/21 24/16 25/16 34/18 44/13 45/13 45/21 49/25 50/3 51/3	becomes [1] 50/25	brevice [1] 39/10	Centre [1] 30/11	come [5] 3/25 4/10 27/2 32/15 36/4
assistance [1] 10/9	been [51] 4/15 6/12 6/22 7/2 7/9 7/24 10/1 11/2 11/7 13/22 15/14 16/21 19/16 21/13 21/14 22/4 22/6 23/17 23/18 23/23 24/9 24/12 24/15 25/6 26/10 26/18 26/22 28/3 30/20 31/24 32/12 33/24 35/3 36/23 37/2 37/9 37/18 37/19 38/21 40/4 41/9 44/5 45/21 46/6 46/17 47/9 47/16 48/11 48/22 49/10 49/22	briefing [2] 13/25 14/3	certainty [2] 7/17 45/1	comes [1] 6/23
assuage [1] 40/13	before [9] 1/6 1/13 1/21 2/3 11/1 16/11 20/17 36/6 41/21	briefly [1] 27/6	challenges [2] 9/12 38/11	coming [3] 10/11 26/15 48/24
at [45] 2/23 3/4 4/14 7/4 8/22 10/20 12/23 14/2 14/14 15/6 16/1 16/7 18/16 22/15 22/24 23/19 24/5 24/22 24/25 25/14 25/25 28/9 29/5 30/12 30/15 30/16 31/2 31/17 32/3 34/6 35/13 36/9 37/4 37/8 39/1 40/12 42/13 42/21 43/4 43/15 44/1 46/13 46/14 47/18 48/15	began [1] 17/16	Brightling [1] 29/17	chance [1] 15/13	coming weeks [1] 26/15
atmosphere [1] 39/17	beginning [2] 24/20 32/17	British [1] 33/20	changes [1] 25/3	commemoration [1] 32/2
attendance [2] 2/4 2/23	begun [1] 21/22	broad [1] 29/21	channels [1] 18/18	commence [3] 10/14 25/12 33/22
attention [5] 17/23 22/19 37/22 38/4 41/10	behalf [17] 1/10 1/24 4/13 6/2 9/25 10/2 10/7 12/2 15/12 26/23 34/2 35/1 45/2 45/4 45/15 52/6 52/10	broadcast [1] 1/14	charities [1] 32/13	comment [2] 31/8 50/15
August [1] 19/8	being [9] 1/14 3/13 10/4 10/23 15/9 25/7 38/15 41/5 46/8	broaden [2] 23/14 25/5	Charlotte [1] 1/25	commented [1] 25/1
August 2023 [1] 19/8	behind [1] 32/22	broken [1] 1/18	Chief [6] 5/9 13/2 13/3 18/14 28/2 28/3	comments [3] 39/6 39/12 41/10
availability [2] 28/4 29/10	being [9] 1/14 3/13 10/4 10/23 15/9 25/7 38/15 41/5 46/8	brought [1] 40/19	Chiefs' [1] 2/1	commission [2] 13/17 29/15
available [13] 17/2 18/7 19/19 22/9 23/17 24/5 31/7 32/11 41/22 42/4 43/1 48/13 49/6	Ben [1] 17/20	bundle [1] 4/2	childhood [1] 29/14	commissioned [1] 48/5
	Ben Connah [1]	burden [1] 5/8	Chris [3] 8/7 8/18 29/17	Commissioner [3] 2/11 13/17 27/1
		but [37] 1/19 2/22 3/22 4/7 4/12 5/10 5/24 6/11 7/6 7/17 8/18 11/1 11/3 13/16 14/15 17/9 18/22 20/1 20/15 20/18 21/9 22/7 22/24 25/9 27/18 32/23 33/2 36/23 38/20 39/11 40/9 41/2 42/4 42/13 42/21 43/18 50/21	Chris Whitty [1] 8/7	Commissioner for [1] 13/17
		Bécares [2] 28/18 28/25	Christmas [2] 20/18 41/19	Committee [6] 2/21 13/25 14/2 16/13 17/8 26/13
		C	chronology [1] 25/20	committees [1] 27/22
		Cabinet [6] 12/19 12/20 17/12 27/22 27/22 45/10	circulate [1] 26/3	communication [6] 16/3 18/12 18/18 23/7 35/19 47/25
		Cabinet Office [5] 12/19 12/20 17/12 27/22 45/10	circulated [4] 4/3 6/13 11/12 14/1	communications [10] 16/4 16/5 16/6 16/10 17/25 20/22 22/17 23/4 48/3 49/3
		call [2] 5/13 43/6	circumstances [2] 19/24 20/13	Communities [3] 45/17 47/19 49/1
			civil [14] 4/19 9/1 12/13 12/22 19/10 19/12 20/7 20/9 20/25 35/19 48/2 48/5 48/6 48/19	community [1] 29/1
			Clair [1] 1/4	comparable [1] 4/25
			Clare [1] 29/4	
			Clayton [1] 25/14	
			Clayton Hotel [1] 25/14	
			clear [8] 4/13 6/14 6/18 7/5 24/11 35/15	

C				
<p>comparative [1] 27/10</p> <p>compared [3] 8/10 8/15 12/23</p> <p>compel [1] 7/14</p> <p>complete [3] 24/2 41/16 47/22</p> <p>completely [1] 9/10</p> <p>completes [1] 51/8</p> <p>compliance [2] 6/21 39/7</p> <p>complied [1] 38/15</p> <p>complying [1] 46/12</p> <p>comprise [1] 47/10</p> <p>comprised [1] 26/13</p> <p>concern [5] 19/21 37/6 38/7 38/13 40/9</p> <p>concerned [2] 16/25 42/24</p> <p>concerning [3] 18/11 20/9 20/25</p> <p>concerns [4] 39/15 39/22 40/13 42/25</p> <p>conclude [1] 44/13</p> <p>concluded [1] 51/11</p> <p>conditioned [1] 9/5</p> <p>conditions [2] 46/21 46/24</p> <p>confident [2] 50/19 50/20</p> <p>confirm [1] 24/1</p> <p>confirmation [1] 17/10</p> <p>conflict [1] 9/13</p> <p>Congress [2] 2/20 2/21</p> <p>Connah [2] 17/20 17/22</p> <p>connection [1] 19/1</p> <p>conscious [3] 5/7 14/16 36/1</p> <p>consequence [1] 25/18</p> <p>consequent [1] 40/4</p> <p>consider [11] 3/7 9/12 15/12 21/8 22/16 22/25 23/2 23/13 30/21 40/17 43/12</p> <p>considerable [3] 14/11 38/23 41/15</p> <p>consideration [10] 9/16 9/24 14/2 21/9 22/10 23/4 24/9 39/2 43/3 49/14</p> <p>considered [4] 22/20 24/24 25/4 29/21</p> <p>considering [3] 9/18 17/5 36/18</p> <p>consistency [1] 25/8</p> <p>consolidate [1] 7/24</p> <p>constitutional [3] 30/17 36/14 47/12</p>	<p>constructive [1] 44/19</p> <p>contact [1] 3/5</p> <p>contemplated [1] 24/4</p> <p>content [1] 40/11</p> <p>contents [1] 21/8</p> <p>context [3] 13/1 23/14 39/17</p> <p>contingencies [1] 9/1</p> <p>contingent [1] 6/7</p> <p>continue [5] 22/8 33/2 43/14 43/16 44/6</p> <p>continues [1] 14/10</p> <p>continuing [2] 42/25 49/2</p> <p>contracts [1] 43/23</p> <p>contributing [1] 4/5</p> <p>convey [1] 16/17</p> <p>copies [1] 20/21</p> <p>core [29] 1/11 2/2 2/22 3/6 4/4 10/13 11/5 13/21 13/23 14/16 14/22 15/12 15/16 16/16 17/3 25/1 26/5 26/16 31/7 31/13 34/12 34/16 36/3 41/22 45/16 46/13 46/14 50/14 50/24</p> <p>core participant [1] 45/16</p> <p>core participants [22] 1/11 2/2 2/22 3/6 4/4 10/13 11/5 13/21 14/16 14/22 15/16 25/1 26/5 26/16 31/7 31/13 34/12 34/16 36/3 41/22 50/14 50/24</p> <p>corporate [4] 45/23 45/25 47/1 47/2</p> <p>correct [1] 23/24</p> <p>correspondence [1] 18/7</p> <p>corresponds [1] 3/2</p> <p>could [4] 6/10 9/19 25/8 36/18</p> <p>Council [1] 2/1</p> <p>counsel [13] 1/5 1/8 1/10 1/22 2/13 25/22 36/13 39/20 42/5 49/23 50/7 52/3 52/13</p> <p>course [39] 1/13 1/15 3/2 3/21 4/10 5/18 6/19 7/13 7/21 8/22 9/7 9/10 9/20 10/22 14/7 14/10 14/23 15/10 16/17 22/10 22/23 28/24 29/2 29/7 29/19 31/11 31/14 31/17 32/21 33/1 33/13 35/24 38/4 38/20 42/2 42/22 44/1</p>	<p>50/8 51/2</p> <p>Covid [13] 3/18 8/5 17/4 17/16 27/12 29/18 33/23 34/2 34/21 35/1 35/4 43/7 52/7</p> <p>Covid Inquiry [1] 17/16</p> <p>Covid-19 [9] 3/18 17/4 27/12 33/23 34/2 35/1 35/4 43/7 52/7</p> <p>CPs [2] 33/21 34/13</p> <p>created [1] 39/17</p> <p>Criminology [1] 30/15</p> <p>critical [1] 10/21</p> <p>criticisms [1] 16/19</p> <p>cross [1] 14/24</p> <p>cross-disclosure [1] 14/24</p> <p>CTI [1] 39/23</p> <p>CTI's [1] 40/3</p> <p>culminated [1] 48/11</p> <p>current [1] 47/22</p> <p>currently [1] 46/8</p> <p>custodians [3] 24/2 24/7 24/15</p> <p>cutting [1] 22/5</p> <hr/> <p>D</p> <p>Danes [1] 2/12</p> <p>Darren [1] 17/13</p> <p>data [12] 19/9 19/18 19/24 20/14 27/9 27/25 28/5 39/20 47/4 48/4 48/8 48/13</p> <p>date [8] 13/23 20/19 24/5 40/6 42/3 46/17 46/25 48/21</p> <p>dates [3] 26/8 26/9 26/18</p> <p>David [2] 12/15 29/13</p> <p>days [2] 43/1 48/24</p> <p>deaths [3] 8/3 8/5 25/25</p> <p>December [4] 1/1 20/3 20/15 31/6</p> <p>December 2023 [1] 31/6</p> <p>decision [7] 3/19 5/14 19/2 22/22 27/10 27/20 44/10</p> <p>decision-making [6] 3/19 5/14 19/2 22/22 27/10 27/20</p> <p>decisions [10] 3/16 7/2 16/16 16/18 16/25 17/2 25/20 26/10 33/24 42/7</p> <p>decreases [1] 6/1</p> <p>definitive [1] 24/7</p> <p>deflect [1] 22/19</p> <p>degree [1] 28/8</p> <p>delay [2] 1/16 39/17</p>	<p>deletion [1] 40/15</p> <p>demanding [2] 4/15 5/7</p> <p>demonstrated [1] 49/13</p> <p>department [9] 2/14 2/17 11/6 11/12 11/15 12/4 12/17 18/13 48/20</p> <p>departmental [4] 2/15 2/18 14/3 45/6</p> <p>departments [24] 4/16 4/19 5/22 17/15 17/17 17/22 18/2 19/6 21/4 21/24 24/14 38/21 45/8 45/12 45/15 45/17 46/22 47/19 48/10 48/13 48/25 49/5 49/9 49/24</p> <p>deputy [3] 19/15 40/1 47/17</p> <p>described [4] 20/14 36/13 39/4 39/23</p> <p>deserving [1] 9/15</p> <p>desire [1] 41/7</p> <p>destroyed [1] 17/19</p> <p>detail [6] 4/11 5/11 18/23 19/22 33/16 40/8</p> <p>detailed [9] 5/5 5/17 6/4 6/12 7/19 13/4 18/25 21/15 25/7</p> <p>details [2] 19/3 20/6</p> <p>determined [2] 45/9 49/25</p> <p>develop [1] 50/23</p> <p>developing [3] 8/15 31/18 50/21</p> <p>developments [1] 42/2</p> <p>devices [12] 19/11 19/14 19/19 20/7 20/10 22/6 22/10 22/24 23/3 23/10 39/25 48/14</p> <p>devolution [1] 27/15</p> <p>devolved [5] 3/11 10/23 17/14 18/3 27/11</p> <p>diaries [2] 49/5 49/7</p> <p>did [2] 8/24 8/25</p> <p>didn't [1] 15/23</p> <p>difference [1] 8/8</p> <p>differences [4] 10/4 12/22 12/25 16/22</p> <p>different [6] 8/14 9/10 13/14 16/15 28/14 33/8</p> <p>difficult [1] 14/14</p> <p>difficulties [1] 39/22</p> <p>digest [1] 46/15</p> <p>digesting [1] 49/16</p> <p>directed [1] 28/6</p> <p>director [3] 17/11</p>	<p>30/10 30/11</p> <p>disability [5] 2/5 13/18 27/1 28/23 34/3</p> <p>disadvantage [1] 29/24</p> <p>discipline [1] 24/25</p> <p>disclosed [7] 14/8 14/9 14/11 15/9 15/14 23/11 40/7</p> <p>disclosure [18] 4/24 11/10 11/16 11/18 11/21 13/22 14/16 14/22 14/24 20/20 21/4 21/19 23/22 34/14 36/2 39/1 41/17 47/7</p> <p>discovery [2] 47/20 49/15</p> <p>discrimination [1] 28/12</p> <p>discuss [6] 3/23 10/13 26/5 34/14 36/5 50/13</p> <p>discussions [1] 49/22</p> <p>disrupted [1] 38/14</p> <p>distill [1] 16/24</p> <p>divert [1] 22/19</p> <p>do [18] 6/14 6/17 6/25 7/14 10/9 16/12 16/14 22/18 32/15 38/12 39/14 40/10 40/15 43/12 44/18 44/23 45/16 51/5</p> <p>Dobbin [5] 1/4 34/24 38/18 49/23 50/6</p> <p>document [2] 5/15 44/2</p> <p>documentary [1] 46/15</p> <p>documentation [3] 15/3 45/24 47/15</p> <p>documents [10] 5/4 6/9 11/15 13/24 14/5 14/7 14/9 15/8 25/19 47/6</p> <p>does [3] 21/10 22/6 22/21</p> <p>doesn't [2] 22/18 26/19</p> <p>don't [3] 1/18 4/25 38/7</p> <p>done [3] 9/19 17/5 21/13</p> <p>door [1] 10/8</p> <p>doubt [1] 37/15</p> <p>down [2] 22/15 31/20</p> <p>Dr [2] 29/4 29/17</p> <p>Dr Clare Wenham [1] 29/4</p> <p>Dr Rachael Evans [1] 29/17</p> <p>draft [6] 6/22 11/13 20/15 31/5 31/8 46/1</p>

D	29/8 equally [1] 41/6 equivalent [1] 48/17 estimated [1] 8/2 Ethics [1] 17/12 euphemistically [1] 39/23 Europe [1] 9/11 Evans [1] 29/17 eve [2] 25/24 29/24 even [1] 37/14 evening [2] 20/2 21/7 event [4] 8/12 9/20 23/21 41/15 events [6] 3/13 25/20 33/7 33/10 33/14 33/17 ever [2] 10/15 11/20 every [9] 5/13 5/15 12/3 32/1 32/4 32/16 33/7 33/17 43/23 everyone [1] 34/6 evidence [60] evident [2] 37/4 40/9 evidential [1] 23/14 examination [1] 40/18 example [3] 15/2 25/24 50/16 excess [3] 5/3 8/2 13/24 executive [41] 1/24 5/2 12/3 12/6 13/25 14/2 16/13 17/7 19/8 19/11 20/5 21/14 23/19 24/3 24/6 26/13 35/19 40/2 40/5 45/2 45/4 45/7 45/13 45/21 45/24 46/7 46/11 46/14 46/21 47/1 47/5 47/8 47/13 47/25 48/15 48/18 48/20 49/5 49/17 49/24 52/10 Executive Office [3] 20/5 45/4 48/18 Executive Office's [1] 23/19 exercise [2] 11/18 15/5 exhibits [6] 11/14 11/25 14/19 45/20 47/7 49/16 exist [1] 22/21 existed [1] 31/2 existing [1] 28/11 expect [3] 1/18 13/12 21/10 expected [1] 37/1 expects [1] 26/14 expeditiously [1] 38/16 experience [2] 32/7 32/24	experienced [1] 29/1 experiences [1] 33/20 expert [10] 27/17 28/7 28/10 28/13 29/5 29/16 29/21 30/17 42/15 50/14 experts [5] 27/4 28/8 30/7 30/8 36/20 explaining [1] 43/10 explanation [1] 36/16 explicit [2] 36/21 36/24 explicitly [1] 37/13 expressed [3] 19/20 38/13 39/14 extensions [1] 5/23 extensive [2] 44/15 45/24 extent [12] 9/5 13/21 18/11 18/17 20/10 20/13 23/7 29/23 39/20 41/8 44/7 46/16 extra [1] 38/20 extremely [2] 8/24 51/4 eye [1] 50/21	42/7 finalisation [1] 31/9 finalised [1] 37/10 finally [3] 32/1 37/8 49/12 Finance [2] 2/17 12/18 financial [2] 38/11 46/24 findings [1] 8/17 finish [1] 34/10 Fiona [1] 2/15 Fiona Fee [1] 2/15 first [14] 6/11 6/15 12/2 19/14 19/15 22/11 30/5 31/5 34/22 40/1 40/1 46/1 47/16 47/17 First Ministers [2] 40/1 47/17 first-hand [1] 30/5 firstly [1] 45/19 five [2] 10/22 44/25 Five minutes [1] 44/25 five months' [1] 10/22 fixing [1] 20/18 flag [2] 15/11 42/21 flagged [2] 15/22 37/9 float [1] 42/4 focus [3] 4/9 16/4 25/17 focused [3] 11/19 16/17 44/19 follow [1] 36/8 followed [1] 46/2 following [6] 17/9 17/25 37/19 40/23 45/14 48/21 forensic [1] 16/6 forgive [1] 44/21 form [2] 24/13 32/11 formal [1] 19/25 former [18] 6/3 6/5 6/24 7/4 9/17 10/2 12/12 12/17 13/8 19/11 19/14 21/18 21/25 26/12 40/1 47/16 48/9 49/9 forms [3] 16/3 16/9 19/4 forthcoming [1] 46/10 forward [2] 32/15 51/7 Foster [2] 2/7 19/15 found [1] 25/10 founded [1] 41/19 four [1] 45/15 framework [1] 9/2 framing [1] 8/19 fraught [1] 16/18	Freeguard [2] 27/19 27/24 Friday [3] 20/2 21/7 45/9 friend [1] 50/10 friend's [1] 39/5 friends [8] 2/25 3/20 4/5 5/10 15/10 15/19 34/19 50/9 front [1] 38/2 full [2] 9/24 43/3 fully [2] 38/15 49/17 function [1] 27/23 functioning [1] 38/12 fundamental [1] 34/7 Fundamentally [1] 9/3 further [19] 13/4 20/5 24/4 24/7 24/8 24/16 30/23 32/16 34/18 40/23 41/24 42/18 44/12 47/2 47/4 50/3 50/6 50/18 51/3 furtherance [1] 49/19 future [4] 9/20 17/5 32/25 37/15
E	each [8] 5/13 7/3 13/10 16/20 17/14 21/20 24/23 27/11 earlier [1] 12/8 early [3] 15/25 18/16 31/7 Eddie [1] 13/17 Edinburgh [1] 27/15 Education [3] 45/18 47/20 48/25 effect [1] 23/10 effective [3] 6/20 9/2 39/2 effectiveness [1] 17/3 efficient [1] 43/19 effort [2] 35/22 45/12 efforts [4] 36/1 36/7 38/10 41/5 eight [1] 45/12 either [2] 20/17 38/8 elicit [1] 18/22 Ellison [1] 2/8 emails [1] 17/24 emergency [1] 27/21 emphasise [2] 3/22 26/7 enable [1] 33/8 enabling [1] 14/21 encourage [2] 32/14 34/15 end [6] 17/4 31/5 37/2 39/5 43/16 46/1 endorse [1] 51/5 enforcement [1] 41/15 engage [3] 6/25 7/7 7/18 engagement [2] 3/1 36/5 engine [1] 14/15 ensure [6] 6/19 11/18 17/15 17/18 32/18 36/2 ensuring [2] 24/23 35/23 enter [1] 14/17 entitled [1] 9/23 equalities [1] 29/6 equality [2] 13/16	F faced [2] 8/21 29/23 facilitate [2] 43/17 47/13 fact [3] 11/6 35/9 38/18 factory [2] 19/16 39/25 fail [2] 7/8 7/18 failed [1] 7/6 failure [1] 7/10 fallen [1] 5/8 familiar [2] 2/4 13/16 families [9] 1/23 26/25 33/14 34/3 34/22 35/2 35/4 43/7 52/7 fanciful [1] 9/22 far [5] 14/9 23/19 32/12 40/20 42/24 fatality [1] 9/21 February [1] 46/21 February 2022 [1] 46/21 Fee [7] 1/24 2/15 44/22 44/24 45/3 50/4 52/11 feed [1] 1/18 fell [1] 25/5 figures [1] 25/24 filed [1] 46/5 fill [1] 37/23 film [4] 32/2 33/23 34/5 44/3 films [1] 44/5 final [4] 7/2 31/6 36/6	fixing [1] 20/18 flag [2] 15/11 42/21 flagged [2] 15/22 37/9 float [1] 42/4 focus [3] 4/9 16/4 25/17 focused [3] 11/19 16/17 44/19 follow [1] 36/8 followed [1] 46/2 following [6] 17/9 17/25 37/19 40/23 45/14 48/21 forensic [1] 16/6 forgive [1] 44/21 form [2] 24/13 32/11 formal [1] 19/25 former [18] 6/3 6/5 6/24 7/4 9/17 10/2 12/12 12/17 13/8 19/11 19/14 21/18 21/25 26/12 40/1 47/16 48/9 49/9 forms [3] 16/3 16/9 19/4 forthcoming [1] 46/10 forward [2] 32/15 51/7 Foster [2] 2/7 19/15 found [1] 25/10 founded [1] 41/19 four [1] 45/15 framework [1] 9/2 framing [1] 8/19 fraught [1] 16/18	G gaps [1] 37/23 gave [4] 15/19 27/8 27/12 27/15 Gavin [2] 27/19 27/24 Gavin Freeguard [2] 27/19 27/24 gender [2] 29/6 29/8 general [7] 11/16 11/18 17/12 21/17 33/12 45/10 47/7 General of [1] 17/12 generally [1] 23/12 geopolitical [1] 8/9 get [3] 9/25 11/21 15/23 gets [1] 5/25 getting [1] 14/18 Givan [1] 2/7 give [9] 7/3 13/20 13/20 26/11 26/19 26/21 36/21 42/18 43/3 given [12] 5/21 16/7 22/15 24/9 26/13 27/19 32/22 35/8 36/25 38/21 41/19 41/25 gives [1] 23/23 giving [2] 7/19 38/20 global [1] 29/4 go [1] 40/8 Godber [1] 1/25 goes [2] 14/15 46/19 going [9] 1/5 1/6 6/23 34/21 38/1 40/8 43/24 44/8 44/11

G
gone [1] 20/2
good [3] 1/3 41/18 45/9
government [28] 3/18 4/16 4/22 5/1 5/22 8/12 9/6 12/3 12/23 12/24 15/7 17/4 18/19 19/2 19/6 19/14 20/8 21/23 27/8 27/21 27/25 30/18 36/15 38/12 39/24 45/8 46/20 48/10
government-supplier [1] 19/14
governs [1] 9/13
grasp [1] 8/25
grateful [12] 2/25 36/6 37/8 37/11 39/5 42/9 44/19 49/18 50/5 50/8 50/10 51/4
grave [1] 19/20
Gray [6] 12/16 30/14 30/25 36/12 37/2 37/20
great [2] 17/8 33/2
grieve [1] 33/2
grounds [2] 28/12 28/19
groups [8] 13/14 19/4 21/5 28/14 29/23 30/3 30/4 33/11
guidance [1] 10/9

H
had [21] 3/8 3/10 4/22 6/8 6/16 11/7 16/21 18/21 19/16 19/22 20/4 21/7 24/1 25/5 31/12 31/16 33/23 35/13 48/5 49/19 50/13
Hale [3] 27/7 42/17 50/17
half [1] 44/8
hand [1] 30/5
handwritten [1] 16/13
Hanna [1] 2/18
happen [2] 1/19 1/20
happened [3] 3/11 19/22 33/9
hard [7] 14/14 14/18 35/22 43/14 45/21 46/15 47/13
has [56]
hasn't [1] 15/14
have [77]
haven't [4] 6/16 8/17 26/22 44/14
having [6] 8/6 11/20 23/11 38/3 44/10 50/18

hazards [1] 8/11
he [5] 8/8 27/10 27/12 30/10 50/13
head [2] 48/1 48/5
health [14] 2/14 11/6 11/12 12/5 12/5 12/11 18/13 18/14 25/23 29/4 31/1 31/15 31/21 37/3
hear [6] 23/6 26/15 32/20 34/1 34/19 34/21
heard [5] 3/14 8/6 11/2 23/11 42/16
hearing [24] 1/4 1/12 1/14 2/23 3/2 3/5 4/3 4/14 5/13 5/25 7/5 10/18 11/5 24/19 25/17 29/19 34/6 35/13 41/24 42/2 43/19 50/18 51/9 51/11
hearings [21] 4/9 4/11 6/19 7/4 10/14 10/21 10/23 25/1 25/12 25/17 26/8 27/2 32/3 33/22 34/8 36/6 36/11 42/20 42/24 49/12 49/17
heavy [1] 5/8
held [3] 19/11 24/3 24/8
help [9] 3/1 10/3 10/10 22/15 25/17 34/17 38/20 43/18 43/18
helpful [4] 8/19 11/22 12/25 15/19
helping [1] 10/5
Henderson [3] 27/14 42/17 50/17
her [1] 27/16
here [1] 28/1
hesitation [1] 7/5
higher [1] 9/21
his [3] 8/7 27/12 37/23
history [1] 39/19
holding [1] 33/14
holds [1] 23/20
hope [3] 12/20 26/24 34/5
hoped [1] 7/16
hopefully [1] 42/11
hopes [1] 33/19
Hotel [1] 25/14
hour [2] 39/1 44/8
how [15] 2/24 8/8 8/10 12/22 22/10 27/22 30/19 32/9 32/22 33/4 33/25 36/16 40/14 44/23 50/21
However [2] 38/6

45/12
huge [1] 51/7
hundreds [1] 47/10
hybrid [1] 1/14
I
I address [1] 16/11
I am [1] 2/25
I appear [3] 1/9 45/4 49/6
I can [9] 11/11 11/15 12/1 16/24 29/20 34/18 44/12 50/3 51/3
I do [1] 6/14
I draw [1] 37/22
I emphasise [1] 26/7
I float [1] 42/4
I haven't [1] 44/14
I just [3] 1/10 1/19 35/21
I know [5] 13/15 32/18 33/3 38/3 40/21
I make [2] 6/17 41/23
I may [12] 3/25 4/13 9/17 10/11 14/12 16/9 22/5 27/6 28/17 32/1 34/10 50/8
I mentioned [1] 10/12
I move [1] 42/6
I need [1] 40/22
I note [1] 29/8
I really [2] 44/18 51/5
I referred [1] 12/8
I represent [9] 35/3 35/7 35/25 37/7 38/6 39/16 40/13 43/11 43/22
I said [2] 24/22 44/8
I say [2] 2/24 10/7
I set [1] 43/12
I should [6] 7/13 15/8 18/6 23/16 24/11 28/1
I speak [2] 42/12 49/25
I specifically [1] 41/10
I started [1] 43/9
I suggest [1] 34/19
I suppose [3] 23/5 31/19 41/4
I think [9] 16/11 23/19 34/20 37/1 38/8 44/23 50/12 50/19 51/6
I trust [1] 39/11
I turn [3] 10/20 16/2 24/18
I urge [1] 43/2
I want [1] 4/4
I wanted [5] 3/22 4/12 6/18 14/12 31/23
I was [1] 44/8
I will [3] 16/8 39/10

43/25
I would [1] 44/13
I'd [1] 1/19
I'll [3] 3/25 4/10 34/10
I'm [12] 14/16 38/1 40/8 41/4 42/16 43/24 44/9 44/19 45/5 50/8 50/10 51/4
I've [4] 3/20 11/3 26/14 39/3
idea [4] 13/20 13/21 41/8 51/6
ideal [1] 46/24
identified [4] 10/1 25/6 26/21 48/23
if [25] 1/17 3/19 3/25 4/13 8/11 9/16 10/11 12/24 14/12 15/13 15/19 15/22 16/9 16/24 22/5 23/22 27/6 28/17 29/20 32/1 34/10 37/16 44/21 50/8 50/25
illuminated [1] 29/22
immediately [2] 19/20 19/21
imminent [1] 41/19
imminently [1] 21/11
impact [6] 31/12 32/2 33/23 44/3 44/5 46/7
importance [2] 33/21 35/7
important [22] 3/4 3/15 4/7 5/18 6/3 7/22 8/24 9/15 9/19 11/19 14/21 15/13 15/23 16/12 16/16 21/21 27/18 28/24 31/10 31/13 32/23 34/13
impractical [1] 40/21
improve [2] 32/25 44/11
Improvement [1] 12/9
incident [1] 20/14
include [3] 12/14 13/16 13/24
included [1] 21/19
including [10] 3/1 17/24 18/12 20/22 21/18 21/24 21/25 23/8 45/23 47/11
incorporate [1] 46/4
increasingly [1] 11/4
indeed [8] 9/11 10/3 11/2 16/21 40/14 41/9 44/17 50/4
independent [4] 40/12 40/16 40/18 40/21
INDEX [1] 51/12
indicated [1] 20/16
indication [2] 35/16 42/9

indicative [1] 37/10
indirect [1] 27/17
individual [10] 4/17 4/22 6/8 19/4 19/7 21/24 22/3 24/12 45/23 47/4
individuals [3] 5/5 16/7 38/21
inequalities [8] 25/23 28/19 28/23 29/1 29/14 29/16 31/1 37/4
inevitably [1] 5/25
inform [1] 5/17
informal [17] 16/3 16/10 18/11 18/18 20/10 20/21 20/23 22/17 23/4 23/7 39/24 47/3 47/24 48/3 48/8 48/16 49/3
information [9] 8/21 15/6 17/2 18/10 18/25 25/21 25/23 42/3 47/14
informed [3] 18/21 19/13 19/23
Infrastructure [3] 45/18 47/19 49/1
inherent [1] 36/23
initially [1] 19/25
Inquiries [2] 7/15 18/5
Inquiries Act [2] 7/15 18/5
inquiry [89]
Inquiry's [8] 17/25 18/6 33/16 33/18 38/7 38/14 41/16 46/17
insight [1] 16/15
insofar [1] 35/17
inspected [3] 23/18 24/10 24/17
inspection [4] 23/16 23/24 23/25 24/5
inspects [1] 12/10
instance [1] 22/11
instances [1] 47/9
instituted [1] 7/23
instructed [3] 27/5 30/7 45/5
instruction [1] 36/12
insufficient [1] 40/12
insufficiently [1] 40/12
interest [1] 7/17
interests [2] 13/14 26/24
internal [2] 14/3 48/6
international [1] 27/9
interruptions [2] 1/20 41/20
into [9] 1/4 16/15 17/11 31/20 35/22 36/10 41/5 46/5 48/7
introduction [2] 2/24

I	Joan [1] 45/5 Joan MacElhatton [1] 45/5 jobs [1] 5/7 join [1] 1/15 joining [1] 1/12 judge [2] 23/9 50/15 judgement [1] 22/13 judging [1] 40/10 Julie [1] 2/8 July [1] 18/24 July 2023 [1] 18/24 junction [2] 3/4 10/21 June [1] 17/9 June 2021 [1] 17/9 jurisdiction [1] 46/18 just [16] 1/10 1/19 3/6 3/15 8/6 10/25 15/24 20/2 27/6 35/3 35/14 35/21 36/18 36/23 38/13 40/4 justice [10] 1/23 34/3 34/22 35/2 35/5 43/8 45/17 47/20 48/25 52/7 Justice Campaign [2] 35/5 43/8	35/13 38/19 47/5 late [4] 18/24 20/2 21/6 32/11 later [1] 24/5 latitude [1] 6/1 latter [1] 37/22 launched [1] 33/6 lead [5] 1/8 3/1 50/7 52/3 52/13 lead-up [1] 3/1 learned [10] 2/25 3/20 4/5 5/10 15/10 15/18 34/19 39/5 50/9 50/10 learnt [1] 7/24 least [3] 36/9 37/8 40/12 led [1] 28/13 left [1] 35/20 legal [16] 3/5 4/2 4/13 5/20 10/7 10/12 11/17 18/20 19/9 19/20 21/2 21/7 25/4 26/4 34/11 46/3 less [2] 10/21 46/24 letters [1] 6/5 level [1] 6/7 Lewis [2] 13/9 37/21 LGBTQ [1] 29/1 light [4] 9/7 23/10 25/3 42/4 like [7] 1/18 8/10 15/2 20/11 22/12 26/25 28/2 likely [2] 7/3 26/12 limitations [2] 9/3 28/4 limited [1] 21/7 lines [1] 34/14 linkage [1] 3/7 linked [1] 39/25 list [19] 4/4 4/7 6/12 11/20 11/23 22/20 24/2 24/7 24/15 24/19 24/21 24/22 25/2 25/2 25/7 26/4 30/23 34/15 37/11 listen [1] 10/15 listing [1] 43/1 little [2] 35/12 38/20 lives [4] 3/17 8/14 32/9 33/9 locations [1] 33/15 long [5] 6/6 11/14 22/19 29/18 44/23 Long Covid [1] 29/18 longer [2] 6/7 47/15 look [1] 44/1 lose [1] 8/13 loss [7] 19/9 19/24 20/14 39/20 47/4 48/4 48/7 lost [1] 41/9 LSE [1] 29/5	luxury [1] 10/22 Lynch [1] 13/17	M M1 [1] 44/5 M2 [2] 35/20 44/5 M2C [2] 35/18 42/19 MacElhatton [1] 45/5 made [29] 7/2 8/17 11/8 11/9 13/3 15/18 16/22 17/1 17/1 18/13 24/4 25/3 26/10 30/21 32/11 33/25 35/15 36/1 36/11 36/19 37/18 37/19 37/20 41/18 41/22 42/9 42/11 44/16 45/15 majority [1] 41/17 make [20] 3/5 3/21 4/13 6/14 6/17 6/18 7/23 10/15 15/24 16/20 23/17 24/11 34/20 37/16 40/21 41/23 42/10 42/14 43/4 45/14 making [9] 3/16 3/19 5/14 5/19 7/5 19/2 22/22 27/10 27/20 mammoth [1] 47/9 manage [1] 9/2 management [1] 20/25 many [6] 5/5 6/14 17/6 32/21 33/25 47/9 March [5] 8/1 8/3 8/4 28/6 46/3 March 2023 [1] 46/3 Marie [1] 30/14 mark [2] 5/7 14/20 marshalling [1] 49/15 material [25] 5/16 6/25 11/19 14/12 14/25 15/2 15/11 16/20 17/18 17/24 21/22 21/23 22/3 22/7 22/8 23/11 38/24 39/1 40/15 40/25 41/2 41/14 41/18 44/10 48/17 matter [8] 23/15 32/20 37/6 38/24 42/21 43/9 48/18 49/10 matters [14] 3/23 5/11 17/7 32/1 32/4 32/16 33/7 33/17 34/7 36/6 42/1 43/23 44/12 50/22 maximise [1] 43/18 may [38] 2/24 3/25 4/13 9/17 10/2 10/11 12/24 14/12 15/10 16/2 16/6 16/9 22/5	22/12 23/2 23/5 23/9 23/13 23/14 23/21 24/17 24/18 27/6 28/17 32/1 32/11 34/10 34/18 36/22 38/19 40/11 41/23 42/10 42/12 42/13 42/13 48/23 50/8 maybe [1] 50/15 me [4] 1/6 3/1 44/21 51/1 mean [2] 22/6 26/19 means [4] 1/16 1/17 32/4 39/24 meant [1] 19/18 meantime [1] 43/14 mechanism [1] 32/8 Medical [4] 5/9 13/2 18/15 28/3 meet [4] 10/13 17/15 26/6 34/16 meetings [11] 3/25 10/11 13/25 14/2 14/4 16/14 34/11 36/3 43/17 49/18 51/6 members [1] 44/6 mention [5] 1/19 6/2 7/13 23/16 31/10 mentioned [2] 10/12 44/14 message [2] 17/22 18/4 messages [7] 17/24 18/22 20/22 21/20 48/21 48/22 49/2 messaging [9] 19/4 20/11 20/23 22/2 23/9 39/24 47/3 48/8 48/16 Michelle [2] 2/9 19/16 might [12] 3/9 8/13 8/14 8/19 8/20 8/22 9/21 12/21 17/5 33/25 41/25 42/17 mind [3] 6/4 41/10 41/23 minimise [1] 38/8 minister [5] 7/4 13/10 19/15 19/16 27/23 Minister's [1] 17/10 ministerial [1] 31/21 ministers [27] 6/4 6/5 6/8 6/14 6/17 6/24 8/23 8/24 9/17 10/3 14/1 16/16 16/20 16/22 17/1 19/11 19/18 20/8 20/24 21/18 21/25 22/4 26/12 40/1 47/17 48/9 49/9 minute [1] 1/16 minutes [4] 13/25 14/3 15/3 44/25
J	lack [3] 31/21 38/11 46/7 Lady [55] Ladyship [4] 35/6 37/6 38/4 49/10 Laia [2] 28/18 28/25 language [2] 31/19 33/20 large [3] 22/24 39/16 45/22 last [5] 10/23 25/13				
introduction... [1] 10/19 investigate [1] 5/13 investigated [2] 3/13 24/24 investigation [7] 19/25 20/21 34/14 40/5 41/2 48/7 48/11 investigations [2] 9/8 40/11 invitation [1] 15/18 involved [7] 3/16 13/5 38/10 44/6 44/7 46/16 49/14 Ireland [82] Ireland's [1] 31/15 Irish [4] 2/21 13/14 35/10 48/6 is [91] isn't [3] 22/7 36/24 38/25 issue [13] 8/19 16/2 23/2 24/23 28/24 29/9 31/1 31/11 33/21 37/24 41/6 42/10 42/23 issued [2] 20/4 21/16 issues [30] 1/6 3/8 4/4 6/12 9/15 9/19 10/1 10/16 11/20 11/23 22/20 23/14 24/18 24/19 24/22 25/2 25/2 25/4 25/5 25/7 25/10 25/18 30/4 30/24 35/18 36/18 37/9 37/11 50/11 50/16 it [62] it's [24] 1/14 1/16 3/13 5/2 6/3 7/16 7/17 7/21 10/15 11/13 14/19 15/24 16/11 21/21 23/24 26/12 26/20 31/10 32/7 32/23 36/23 38/8 42/12 51/6 its [11] 7/25 9/7 11/12 11/16 11/18 17/16 21/8 37/13 41/14 45/25 48/17 itself [2] 12/3 22/24					
James [1] 28/17 January [9] 3/25 10/12 13/11 17/20 26/3 37/2 47/23 50/13 50/24 January 2020 [1] 13/11 January 2024 [1] 26/3					

<p>M</p> <p>misunderstandings [1] 43/18</p> <p>mobile [1] 20/7</p> <p>modelling [2] 13/6 14/5</p> <p>module [86]</p> <p>Module 1 [1] 46/13</p> <p>Module 2 [25] 3/3 3/8 3/13 3/15 8/8 8/17 9/6 11/3 14/24 14/25 15/8 15/16 25/9 25/10 27/4 27/8 27/13 28/20 29/2 29/7 29/19 29/22 42/16 42/19 46/14</p> <p>Module 2C [46] 1/4 3/3 3/9 4/15 4/24 5/4 5/20 10/20 11/17 11/20 13/23 14/11 14/17 15/1 15/4 15/9 15/13 15/15 15/18 15/21 16/4 16/12 18/9 18/16 19/9 19/20 21/2 21/22 22/16 22/21 23/5 24/23 26/6 26/23 27/6 27/18 28/24 29/25 30/2 30/7 34/11 35/16 43/8 45/16 46/25 49/20</p> <p>Module 2C's [1] 30/23</p> <p>modules [3] 4/23 46/17 49/13</p> <p>Modules 1 [2] 4/23 49/13</p> <p>monitoring [2] 6/20 39/7</p> <p>month [1] 42/11</p> <p>months [1] 35/14</p> <p>months' [1] 10/22</p> <p>more [10] 9/7 9/21 15/17 15/21 16/18 23/6 23/12 36/4 37/14 43/6</p> <p>more relevant [1] 15/21</p> <p>most [12] 5/6 5/18 7/22 9/15 11/19 11/23 13/9 15/23 25/18 27/3 42/3 46/23</p> <p>move [1] 42/6</p> <p>Mr [16] 1/22 2/7 2/9 12/15 13/17 17/13 17/21 17/22 18/1 34/23 34/25 35/2 44/17 49/23 50/11 52/7</p> <p>Mr Bassett [1] 2/9</p> <p>Mr Connah [1] 17/22</p> <p>Mr Darren Tierney [1] 17/13</p> <p>Mr Eddie Lynch [1] 13/17</p>	<p>Mr Paul Givan [1] 2/7</p> <p>Mr Peter Wilcock [2] 1/22 34/23</p> <p>Mr Richard Pengelly [1] 12/15</p> <p>Mr Scott [1] 49/23</p> <p>Mr Tierney [2] 17/21 18/1</p> <p>Mr Wilcock [3] 34/25 44/17 50/11</p> <p>Ms [18] 1/4 1/24 1/25 2/8 2/9 2/10 2/12 12/16 19/16 34/24 38/18 44/22 44/24 45/3 49/23 50/4 50/6 52/11</p> <p>Ms Anyadike-Danes [1] 2/12</p> <p>Ms Charlotte Godber [1] 1/25</p> <p>Ms Clair Dobbin [1] 1/4</p> <p>Ms Dobbin [4] 34/24 38/18 49/23 50/6</p> <p>Ms Fee [3] 44/22 44/24 50/4</p> <p>Ms Julie Ellison [1] 2/8</p> <p>Ms Michelle O'Neill [2] 2/9 19/16</p> <p>Ms Nessa Fee [1] 1/24</p> <p>Ms O'Flaherty [1] 2/10</p> <p>Ms Sue Gray [1] 12/16</p> <p>much [9] 3/14 22/12 26/24 34/7 34/24 44/17 50/4 51/6 51/8</p> <p>Muirugh [1] 2/10</p> <p>Murphy [1] 2/6</p> <p>must [3] 20/19 32/21 39/15</p> <p>my [71]</p> <p>my Lady [55]</p> <hr/> <p>N</p> <p>National [1] 2/1</p> <p>natural [1] 8/11</p> <p>nature [2] 28/8 49/14</p> <p>Nazroo [1] 28/17</p> <p>necessarily [2] 14/8 26/19</p> <p>necessary [4] 5/16 7/16 50/19 50/25</p> <p>need [6] 10/17 15/4 22/18 22/20 40/22 41/20</p> <p>NERVTAG [1] 15/3</p> <p>Nessa [1] 1/24</p> <p>never [1] 5/12</p> <p>Nevertheless [1] 43/2</p> <p>new [3] 3/10 33/15</p>	<p>33/21</p> <p>New Year [2] 33/15 33/21</p> <p>newsletters [1] 33/17</p> <p>next [6] 21/8 26/6 35/24 42/6 42/11 43/16</p> <p>Nicholas [1] 28/22</p> <p>Nick [1] 1/10</p> <p>Nick Scott [1] 1/10</p> <p>Nicolas [1] 2/18</p> <p>Nicolas Hanna [1] 2/18</p> <p>nil [1] 31/20</p> <p>nine [2] 35/14 45/7</p> <p>nine months [1] 35/14</p> <p>NISRA [1] 12/7</p> <p>no [15] 7/2 7/5 7/17 17/18 19/18 25/10 26/10 33/24 37/15 39/15 42/7 45/10 47/15 50/4 51/4</p> <p>no one [1] 39/15</p> <p>no one's [1] 7/17</p> <p>nonetheless [2] 8/18 27/18</p> <p>normally [1] 32/14</p> <p>Northern [86]</p> <p>Northern Ireland [77]</p> <p>Northern Ireland's [1] 31/15</p> <p>Northern Irish [2] 13/14 48/6</p> <p>not [34] 1/17 2/23 3/20 5/12 5/15 6/17 6/25 7/16 7/17 9/22 10/25 11/22 14/7 22/6 23/23 23/24 38/1 38/14 38/15 39/10 40/8 40/20 40/22 41/13 41/13 41/24 42/12 43/2 43/17 43/24 44/9 44/11 45/16 50/19</p> <p>notably [1] 46/23</p> <p>note [13] 11/5 11/11 29/8 35/16 37/1 37/12 37/25 38/5 39/13 40/3 40/3 41/12 42/7</p> <p>notebook [1] 24/15</p> <p>notebooks [13] 23/17 23/18 23/20 23/24 23/25 24/2 24/4 24/7 24/9 24/13 24/17 49/4 49/7</p> <p>noted [1] 26/11</p> <p>notes [5] 13/24 14/3 16/13 16/19 17/8</p> <p>notice [2] 26/8 38/22</p> <p>notified [2] 19/8 26/22</p> <p>November [5] 18/15 21/2 21/15 23/25 40/6</p>	<p>November 2022 [1] 18/15</p> <p>November 2023 [2] 21/15 40/6</p> <p>now [6] 14/7 17/20 20/16 44/18 47/21 48/12</p> <p>nuggets [1] 22/14</p> <p>number [20] 2/2 2/4 6/6 6/9 12/14 13/15 14/18 21/24 25/1 25/10 25/19 27/4 28/14 31/13 31/24 39/16 40/2 40/25 43/1 48/22</p> <hr/> <p>O</p> <p>O'Connor [2] 30/9 36/12</p> <p>O'Flaherty [1] 2/10</p> <p>O'Neill [2] 2/9 19/16</p> <p>oath [1] 7/10</p> <p>obligations [3] 17/16 18/4 46/12</p> <p>observation [1] 40/10</p> <p>observations [4] 6/17 8/18 42/10 45/14</p> <p>observe [1] 47/8</p> <p>obtain [1] 28/7</p> <p>obtained [2] 28/11 29/16</p> <p>obtaining [1] 28/13</p> <p>obvious [1] 14/25</p> <p>obviously [7] 9/18 24/8 26/15 38/16 39/9 41/8 50/25</p> <p>occurred [1] 19/21</p> <p>occurring [1] 31/23</p> <p>October [8] 18/14 20/1 21/15 27/13 27/16 28/20 46/2 46/5</p> <p>October 2022 [2] 18/14 46/2</p> <p>October 2023 [1] 20/1</p> <p>off [2] 35/20 35/21</p> <p>offers [1] 32/5</p> <p>office [40] 1/25 2/16 2/19 5/3 12/3 12/5 12/19 12/20 17/12 19/8 20/5 21/14 24/3 24/6 27/22 27/23 40/5 45/2 45/4 45/6 45/7 45/10 45/13 45/21 45/24 46/12 46/14 46/22 47/1 47/5 47/8 47/13 47/25 48/15 48/18 48/20 49/5 49/18 49/24 52/10</p> <p>Office's [1] 23/19</p> <p>Officer [4] 5/9 13/3 18/15 28/3</p> <p>officers [1] 40/2</p>	<p>officials [2] 20/24 23/21</p> <p>Oh [1] 45/1</p> <p>Older [3] 2/11 13/18 27/2</p> <p>on [81]</p> <p>one [14] 7/22 8/19 8/20 9/20 14/14 24/23 25/5 31/14 31/17 33/14 38/8 39/15 43/6 45/7</p> <p>one's [1] 7/17</p> <p>ongoing [5] 14/10 35/8 36/5 39/22 40/19</p> <p>only [3] 21/6 39/10 43/17</p> <p>onslaught [1] 38/25</p> <p>onward [2] 13/22 14/22</p> <p>open [2] 10/8 33/12</p> <p>operates [1] 12/23</p> <p>operating [2] 46/17 46/22</p> <p>operation [2] 34/8 36/8</p> <p>opinion [1] 16/23</p> <p>opportunity [8] 3/23 10/15 10/25 15/24 31/8 32/6 34/13 45/14</p> <p>optimism [1] 41/16</p> <p>or [46] 3/7 3/9 5/14 6/6 6/7 7/7 8/11 8/14 9/21 10/5 10/9 10/9 10/16 12/2 15/3 15/5 15/6 15/21 16/5 16/7 16/20 17/24 20/17 20/23 20/24 22/14 22/15 22/19 22/23 23/6 23/10 23/22 24/13 25/11 28/4 28/8 30/3 33/14 38/9 38/10 40/12 41/24 42/8 45/11 48/7 50/17</p> <p>oral [8] 7/20 9/17 24/25 25/12 34/8 38/1 42/18 46/15</p> <p>orally [3] 39/11 44/11 44/14</p> <p>order [6] 5/17 6/10 10/13 18/22 25/16 25/17</p> <p>ordinary [1] 31/19</p> <p>ordinating [1] 45/11</p> <p>organisations [5] 13/13 26/25 30/3 32/14 34/1</p> <p>other [27] 3/5 3/12 9/24 14/23 16/3 16/20 17/25 18/16 19/18 20/23 23/5 23/13 23/21 24/13 24/14 25/11 27/17 28/12 32/13 40/16 45/12 45/15 46/22 49/5 49/9</p>
---	---	--	--	--

O	37/24 other... [2] 49/24 50/16 others [1] 12/2 ought [5] 1/17 4/7 4/9 26/17 41/13 our [17] 10/8 13/23 14/21 34/17 35/15 36/4 37/25 39/13 39/21 40/8 40/10 41/7 41/11 42/25 43/4 44/5 49/21 out [15] 1/6 11/1 14/5 25/22 28/1 37/3 37/24 39/12 40/9 41/5 41/11 43/5 43/12 43/23 44/15 outbreak [2] 31/2 37/5 outlined [1] 39/21 outset [3] 4/14 24/22 34/6 outstanding [3] 10/16 38/24 38/25 over [2] 14/9 47/5 overall [3] 23/3 23/9 25/24 overarching [1] 36/14 overdue [1] 20/16 oversight [1] 31/21	paragraphs 9 [1] 39/13 paralegal [1] 14/20 paralegals [1] 14/13 part [12] 5/6 6/18 9/24 14/21 14/23 15/5 18/19 21/16 23/3 24/25 42/16 48/8 participant [4] 15/12 45/16 46/13 46/14 participants [23] 1/11 2/2 2/22 3/6 4/4 10/13 11/5 13/21 13/23 14/16 14/22 15/16 25/1 26/5 26/16 31/7 31/13 34/12 34/16 36/3 41/22 50/14 50/24 participating [1] 49/17 participation [1] 33/5 particular [10] 15/11 15/21 17/17 17/23 24/25 27/22 29/22 29/24 37/21 49/8 particularly [12] 6/3 11/7 16/18 20/12 33/4 34/22 35/8 35/25 37/18 41/19 42/17 50/13 parts [2] 4/21 11/13 party [1] 20/24 passed [1] 40/6 patient [1] 49/20 Paul [1] 2/7 peculiarities [1] 47/12 Pengelly [1] 12/15 people [14] 2/11 8/13 9/23 13/18 21/5 27/2 32/14 32/19 32/21 33/1 33/3 33/8 33/11 51/1 perceived [1] 8/8 perhaps [1] 37/14 period [4] 8/4 14/17 21/1 46/11 periods [1] 47/21 permanent [4] 12/17 12/20 17/13 18/2 permanent secretaries [2] 17/13 18/2 permanent secretary [2] 12/17 12/20 personal [1] 20/7 Peter [2] 1/22 34/23 phase [1] 38/19 phrasing [1] 44/2 pick [1] 35/18 pilot [2] 33/6 33/19 pin [1] 22/15 place [9] 4/10 17/11	23/18 24/1 25/14 25/25 35/7 35/25 41/3 plain [1] 22/14 Plainly [3] 3/11 7/16 21/9 planned [1] 35/23 planning [1] 8/13 plans [1] 24/19 platform [1] 20/23 play [1] 14/20 pm [2] 1/2 51/10 point [5] 8/22 16/8 22/16 28/1 31/25 points [3] 10/17 26/1 44/14 Police [2] 2/1 12/6 policies [3] 19/3 20/9 20/12 policy [4] 29/5 30/11 30/15 30/16 political [2] 10/4 35/9 Politics [1] 30/15 position [2] 9/9 19/17 positions [1] 16/15 possession [1] 48/17 possible [4] 26/20 35/17 38/17 41/3 possibly [2] 5/21 39/12 post [2] 9/13 13/10 potential [8] 17/18 19/9 20/14 26/7 26/7 37/23 47/3 48/3 potentially [1] 41/8 power [9] 4/18 7/14 9/14 13/1 13/11 30/19 31/11 31/16 36/16 power-sharing [3] 4/18 30/19 36/16 powers [1] 41/15 practical [1] 38/10 practically [1] 30/20 practice [1] 36/17 pre [8] 11/5 28/8 28/11 28/19 28/23 29/6 29/14 40/10 pre-existing [1] 28/11 pre-hearing [1] 11/5 pre-judging [1] 40/10 pre-pandemic [5] 28/8 28/19 28/23 29/6 29/14 precious [1] 43/19 precluding [1] 39/1 preliminary [5] 1/4 35/13 36/11 41/24 51/9 preparation [6] 4/3 6/19 25/16 25/20 49/15 49/20 preparations [1] 34/17 preparing [1] 4/8	prescriptive [1] 25/8 present [2] 1/13 9/12 presented [1] 38/11 presently [2] 40/19 43/1 preservation [1] 23/8 preserves [1] 32/24 preserving [1] 16/7 pressures [2] 4/19 5/21 previous [1] 36/11 previously [3] 37/9 37/20 39/3 Prime [2] 17/10 27/23 Prime Minister [1] 27/23 Prime Minister's [1] 17/10 prior [6] 7/19 31/8 31/12 31/16 31/22 46/8 probably [1] 50/12 procedure [1] 40/19 process [12] 4/8 6/15 6/23 7/18 11/16 14/10 17/1 21/17 22/2 38/14 47/15 49/2 produce [1] 36/25 produced [1] 23/1 production [1] 7/14 productive [1] 43/17 professor [19] 8/7 8/18 27/7 27/14 28/17 28/18 28/21 28/22 28/25 29/4 29/13 29/17 30/9 30/14 30/14 30/25 37/2 50/17 50/17 Professor Ailsa Henderson [1] 27/14 Professor Ann-Marie Gray [1] 30/14 Professor Chris Brightling [1] 29/17 Professor David [1] 29/13 Professor Gray [2] 30/25 37/2 Professor Hale [1] 50/17 Professor Henderson [1] 50/17 Professor James Nazroo [1] 28/17 Professor Karl O'Connor [1] 30/9 Professor Laia Bécares [2] 28/18 28/25 Professor Nicholas Watson [1] 28/22 Professor Sir [2] 8/7 8/18	Professor Thomas Hale [1] 27/7 Professor Thomas Shakespeare [1] 28/21 Professors [2] 36/12 42/17 Professors O'Connor [1] 36/12 profoundly [2] 3/18 33/4 programme [1] 33/6 promise [1] 36/4 prompt [1] 8/14 properly [3] 7/7 22/25 49/25 proportionately [1] 46/19 proposals [2] 26/1 49/16 proposed [2] 34/10 34/15 Propriety [1] 17/12 prospect [1] 9/22 proves [2] 41/18 42/23 provide [23] 4/9 6/10 9/1 12/25 14/21 16/14 24/13 24/15 25/18 25/19 26/9 26/18 28/3 30/18 30/25 31/4 32/6 35/10 36/13 37/3 38/23 48/16 49/6 provided [28] 5/3 5/23 6/24 11/12 14/4 16/21 18/10 18/23 19/5 20/1 20/2 20/6 20/17 22/1 22/4 24/2 27/24 28/9 28/18 28/22 28/25 29/5 29/13 33/16 47/6 47/20 48/20 49/1 providers [1] 41/14 provides [1] 36/14 providing [7] 4/24 6/15 7/19 10/8 11/16 14/15 45/22 provision [2] 36/2 39/7 provisional [2] 24/21 26/3 provokes [1] 33/2 public [10] 5/6 5/12 12/5 16/22 18/14 29/19 30/9 30/12 33/12 40/14 publicly [1] 18/7 purpose [1] 30/7 pursuing [1] 23/24 put [14] 1/6 7/1 8/11 10/25 11/2 15/4 26/8 31/19 32/22 35/22 39/22 41/5 44/5 44/10 putting [1] 10/4
----------	--	--	---	--	---

Q	regards [2] 45/11 50/18	requested [1] 23/22	role [2] 12/25 45/11	self-evident [1] 40/9
quality [2] 12/9 28/5	registers [1] 12/10	requesting [1] 18/25	rolling [1] 15/9	send [1] 18/21
question [3] 7/6 22/12 22/23	regular [1] 49/18	requests [17] 5/6 5/23 5/24 11/1 11/9 11/24 18/13 18/22 21/16 21/17 37/18 38/15 39/9 40/24 45/19 47/10 47/22	room [2] 1/21 14/15	sending [2] 11/1 21/17
questioning [1] 5/17	regulated [1] 23/8	require [1] 24/24	roughly [1] 44/23	senior [5] 12/13 19/12 20/9 20/24 48/19
questions [11] 6/21 7/8 7/12 15/17 15/20 15/22 30/23 39/8 46/2 46/6 47/10	Regulation [1] 12/8	required [9] 20/20 26/11 26/21 37/16 38/9 38/16 38/22 39/9 40/18	Rule [25] 5/6 5/23 5/24 6/5 6/22 11/1 11/8 11/24 18/9 18/21 20/5 20/20 21/3 21/15 21/17 31/25 37/18 38/14 39/9 40/23 45/19 45/25 47/10 47/22 48/1	sense [1] 39/24
quite [1] 41/21	reiterated [1] 17/22	research [2] 8/2 30/10	Rule 9 [23] 5/6 5/23 5/24 6/5 6/22 11/1 11/8 11/24 18/21 20/5 20/20 21/3 21/15 21/17 37/18 38/14 39/9 40/23 45/19 45/25 47/10 47/22 48/1	sensitivities [2] 10/5 43/10
R	reiterating [2] 7/22 18/3	reset [3] 19/16 22/6 22/11	Rule 9s [1] 31/25	sent [5] 5/5 6/4 18/9 20/22 21/2
race [1] 28/19	related [2] 8/5 28/23	resetting [4] 22/24 23/3 23/10 39/25	ruling [2] 28/6 28/9	separate [3] 22/9 24/18 29/15
Rachael [1] 29/17	relating [3] 25/25 27/9 35/18	resolved [1] 10/17	S	separately [1] 47/17
racism [1] 28/9	relation [14] 19/10 19/18 27/11 28/14 29/8 37/22 39/19 46/7 46/25 47/24 48/3 49/4 49/8 49/12	resonate [1] 8/20	Safety [1] 12/5	September [3] 18/9 45/20 46/1
raise [2] 3/9 32/16	relationships [1] 36/21	resources [2] 4/25 22/19	SAGE [1] 15/2	September 2022 [3] 18/9 45/20 46/1
raised [1] 49/10	relevance [2] 17/18 27/17	respect [3] 6/5 21/5 50/17	said [11] 1/17 8/8 11/3 19/17 24/22 26/14 38/6 39/19 40/22 42/5 44/8	serious [2] 9/16 22/20
raising [1] 50/11	relevant [16] 5/15 11/23 14/8 15/1 15/8 15/12 15/17 15/21 20/21 21/1 27/5 28/15 29/25 30/23 41/9 41/18	respond [4] 4/22 8/25 46/4 47/2	sake [1] 38/3	servants [7] 4/20 5/6 12/13 19/12 20/9 20/25 48/19
range [3] 6/7 12/11 37/17	remains [1] 22/24	responding [6] 4/20 4/23 10/6 11/8 30/22 36/20	same [8] 8/4 15/7 21/4 21/5 31/17 39/19 46/13 48/15	serve [1] 34/5
ranging [1] 47/11	remind [1] 34/6	response [13] 6/10 7/25 8/15 9/4 9/5 9/6 12/13 17/4 18/19 19/7 32/25 35/21 46/23	saw [1] 16/4	served [1] 21/6
rate [1] 9/22	reminding [2] 18/4 41/14	responses [1] 32/12	say [11] 2/24 10/2 10/7 11/15 14/19 15/8 16/12 18/6 21/21 31/23 43/25	service [9] 12/6 12/23 19/10 20/7 31/15 35/20 48/2 48/5 48/6
rather [1] 32/22	remote [1] 2/3	responsibilities [1] 6/8	saying [2] 41/4 46/19	service-supplied [2] 19/10 20/7
read [1] 38/5	repeat [4] 38/1 39/11 40/10 43/24	rest [1] 9/11	School [2] 27/8 30/15	service-wide [1] 48/6
reader [1] 30/9	repeating [1] 44/4	resulted [1] 46/3	Scientific [2] 13/3 28/2	services [3] 12/11 29/10 31/22
ready [3] 17/15 40/5 43/15	replicated [1] 49/22	resuming [1] 31/16	scope [1] 48/23	servicing [1] 12/12
realistic [1] 5/15	Reply [2] 50/7 52/13	retention [4] 17/23 22/1 41/1 48/7	Scott [2] 1/10 49/23	set [9] 1/5 37/24 39/12 40/9 41/11 43/5 43/12 43/23 44/15
realities [1] 10/6	report [14] 5/18 7/25 19/25 20/21 21/6 23/1 27/12 27/16 31/5 40/4 40/16 40/21 48/11 50/14	reticent [1] 41/13	scrutiny [1] 35/11	setting [3] 14/5 25/22 37/3
reality [1] 35/12	reports [3] 31/15 36/25 37/1	retrieve [1] 48/13	second [1] 12/19	settings [1] 19/17
really [9] 14/14 14/18 14/20 32/20 39/14 41/4 44/9 44/18 51/5	represent [11] 13/13 30/3 35/3 35/7 35/25 37/7 38/6 39/16 40/13 43/11 43/22	returned [1] 46/6	Secondly [1] 47/24	seven [1] 47/4
reason [2] 34/7 43/3	representations [8] 26/16 36/10 37/16 37/19 38/1 42/14 43/24 44/15	returning [1] 9/16	secondment [1] 12/18	Shakespeare [1] 28/21
reasons [6] 7/22 9/4 31/14 39/10 43/5 43/12	represented [8] 2/5 2/8 2/9 2/12 2/15 2/18 26/25 47/17	reveal [1] 22/17	secretaries [2] 17/13 18/2	share [2] 38/6 38/13
recalcitrant [1] 41/14	representing [2] 1/11 3/6	review [5] 23/15 37/14 41/20 42/1 48/21	secretary [4] 12/17 12/20 13/8 17/20	shared [2] 32/12 48/12
receive [4] 21/11 26/14 40/24 49/11	represents [3] 1/22 2/1 34/23	reviewing [1] 22/3	section [1] 7/15	sharing [9] 4/18 9/14 13/1 13/11 30/19 31/11 31/16 33/19 36/16
received [8] 12/1 13/23 20/19 21/22 24/6 42/19 45/24 47/25	request [14] 6/22 11/8 13/4 18/1 18/9 19/5 20/5 20/20 21/3 21/19 43/3 45/25 47/2 48/1	revised [1] 37/10	section 21 [1] 7/15	she [2] 12/21 12/24
receives [1] 41/21	requesting [1] 18/25	revisited [1] 42/22	secure [1] 22/8	short [2] 1/20 11/4
recent [1] 36/3	requests [17] 5/6 5/23 5/24 11/1 11/9 11/24 18/13 18/22 21/16 21/17 37/18 38/15 39/9 40/24 45/19 47/10 47/22	Richard [1] 12/15	see [2] 12/24 16/19	shorthand [1] 16/9
recommendations [2] 5/19 7/23	reiterated [1] 17/22	right [4] 5/2 11/21 14/19 31/10	seek [3] 37/16 38/7 42/10	shortly [1] 4/1
recommended [1] 31/16	reiterating [2] 7/22 18/3	rightly [2] 38/8 39/23	seeking [2] 20/5 21/4	should [13] 7/13 15/8 15/20 18/6 19/21 23/16 24/10 24/11 28/1 28/7 28/10 38/16 46/9
record [1] 32/8	relating [3] 25/25 27/9 35/18	rigour [1] 24/24	seeks [1] 32/8	shown [2] 32/3 49/21
records [2] 24/14 32/24	relation [14] 19/10 19/18 27/11 28/14 29/8 37/22 39/19 46/7 46/25 47/24 48/3 49/4 49/8 49/12	Robin [1] 37/20	seemingly [1] 35/12	side [1] 3/12
refer [1] 16/8	relationships [1] 36/21	Robin Swann [1] 37/20	self [1] 40/9	sight [4] 6/16 15/19
referred [2] 6/9 12/8	relevance [2] 17/18 27/17	Robinson [1] 29/13		
referring [1] 44/13	relevant [16] 5/15 11/23 14/8 15/1 15/8 15/12 15/17 15/21 20/21 21/1 27/5 28/15 29/25 30/23 41/9 41/18			
reflect [1] 3/7	remains [1] 22/24			
reflecting [1] 7/21	remind [1] 34/6			
reform [1] 31/16	reminding [2] 18/4 41/14			
regard [2] 5/9 11/20	remote [1] 2/3			
regarded [1] 15/22	repeat [4] 38/1 39/11 40/10 43/24			
regarding [3] 20/12 28/11 47/3	repeating [1] 44/4			

<p>S</p> <p>sight... [2] 15/25 50/13</p> <p>Sign [1] 33/20</p> <p>signed [1] 41/17</p> <p>significant [4] 12/22 21/18 46/4 46/23</p> <p>significantly [1] 13/9</p> <p>similar [5] 16/5 16/9 18/12 21/3 39/21</p> <p>simple [1] 15/1</p> <p>simply [5] 8/11 38/2 43/25 44/9 44/13</p> <p>simultaneously [1] 4/23</p> <p>since [4] 11/11 24/6 45/20 46/20</p> <p>Sir [4] 8/7 8/18 12/15 13/9</p> <p>Sir Brandon Lewis [1] 13/9</p> <p>Sir David Sterling [1] 12/15</p> <p>situations [1] 27/21</p> <p>slow [1] 11/7</p> <p>small [3] 46/18 46/19 48/22</p> <p>so [29] 1/14 1/21 3/17 6/16 10/2 12/14 13/20 14/11 15/1 18/16 18/20 21/9 22/5 23/5 23/13 25/19 26/17 29/20 30/4 32/12 32/15 32/23 34/7 38/24 40/23 42/1 42/24 44/8 51/8</p> <p>sober [1] 9/16</p> <p>social [5] 12/11 30/10 30/11 30/14 30/15</p> <p>society [4] 9/13 13/15 28/14 29/23</p> <p>Solicitor's [3] 2/16 2/19 45/6</p> <p>solicitors [2] 2/6 2/10</p> <p>some [21] 6/23 11/3 12/21 13/5 15/15 15/16 16/4 16/14 16/22 22/1 22/6 23/18 30/25 33/10 33/21 36/21 36/24 37/8 40/24 49/1 50/11</p> <p>something [2] 29/11 35/24</p> <p>sometimes [1] 1/20</p> <p>soon [1] 41/3</p> <p>sorry [1] 50/23</p> <p>sort [1] 8/15</p> <p>sort of [1] 8/15</p> <p>sorts [1] 16/6</p> <p>sought [21] 5/20 11/25 12/1 12/12 12/16 13/2 13/4 13/6</p>	<p>13/12 13/22 15/17 18/17 18/20 18/23 19/3 19/22 21/14 25/6 25/8 29/11 30/16</p> <p>sources [1] 17/6</p> <p>span [1] 29/21</p> <p>speak [5] 33/8 33/13 34/12 42/12 49/25</p> <p>speaking [1] 22/14</p> <p>special [3] 13/7 20/8 48/9</p> <p>specific [7] 10/25 13/7 25/25 29/9 31/2 33/11 35/10</p> <p>specifically [2] 4/20 41/10</p> <p>spite [2] 37/12 43/25</p> <p>spoken [1] 3/20</p> <p>stage [4] 16/1 18/16 42/14 42/22</p> <p>stagger [1] 5/24</p> <p>stalemate [1] 35/9</p> <p>stance [1] 43/21</p> <p>start [5] 10/21 35/21 35/23 43/15 44/22</p> <p>started [2] 40/24 43/9</p> <p>State [1] 13/8</p> <p>stated [2] 38/18 40/3</p> <p>statement [20] 1/8 7/8 7/9 11/9 11/13 11/14 12/16 20/6 20/15 20/19 21/10 23/2 45/25 46/5 47/1 47/3 48/1 50/7 52/3 52/13</p> <p>statements [25] 4/8 4/12 6/21 6/24 11/25 12/2 12/12 13/2 13/5 13/7 13/10 13/13 14/19 26/15 39/8 41/17 45/20 45/23 46/10 47/4 47/8 47/21 48/19 49/8 49/16</p> <p>states [1] 37/13</p> <p>statistical [1] 25/21</p> <p>statistics [2] 8/1 12/7</p> <p>status [1] 45/16</p> <p>statutory [1] 17/10</p> <p>stenographer [1] 44/21</p> <p>steps [2] 17/14 21/8</p> <p>Sterling [1] 12/15</p> <p>still [1] 22/9</p> <p>Stormont [1] 35/11</p> <p>Story [6] 32/1 32/4 32/16 33/7 33/17 43/23</p> <p>strands [1] 48/21</p> <p>strike [1] 25/6</p> <p>strive [1] 9/25</p> <p>structural [3] 28/9 28/11 29/15</p> <p>structure [1] 45/8</p>	<p>structured [1] 6/11</p> <p>structures [3] 27/20 30/19 36/16</p> <p>subject [3] 1/16 4/12 5/22</p> <p>submissions [10] 3/21 16/8 23/20 34/20 35/1 35/15 43/4 45/2 52/6 52/10</p> <p>submitted [1] 46/1</p> <p>subsequently [1] 19/5</p> <p>successful [1] 44/4</p> <p>such [11] 20/10 30/3 39/17 40/14 40/21 41/1 41/8 43/17 44/10 44/18 51/7</p> <p>Sue [2] 12/16 37/20</p> <p>Sue Gray [1] 37/20</p> <p>sufficient [1] 50/20</p> <p>sufficiently [2] 6/25 40/20</p> <p>suggest [2] 23/22 34/19</p> <p>suggested [1] 25/3</p> <p>suggestion [1] 41/23</p> <p>suggests [1] 23/20</p> <p>summarise [2] 28/17 29/20</p> <p>supplied [3] 19/10 19/14 20/7</p> <p>support [1] 36/4</p> <p>suppose [3] 23/5 31/19 41/4</p> <p>sure [2] 10/16 15/24</p> <p>surprised [1] 37/15</p> <p>surrounding [1] 19/3</p> <p>Swann [1] 37/20</p> <p>synthesising [1] 45/11</p> <p>system [1] 8/9</p> <p>systemic [1] 29/24</p> <p>systems [2] 20/11 48/8</p>	<p>26/4 26/6 26/23 33/19 34/11 35/22 39/6 43/15 45/21 46/3 46/6 46/19 48/16 48/22 49/19 49/21 50/1</p> <p>team's [2] 37/17 38/13</p> <p>teams [1] 3/6</p> <p>tell [1] 12/1</p> <p>TEO [12] 18/10 18/24 19/5 19/13 19/23 20/16 21/24 23/1 23/17 23/20 24/1 24/8</p> <p>terms [8] 4/15 10/8 11/24 12/22 13/22 14/18 24/19 44/2</p> <p>terrorism [1] 8/10</p> <p>terrorist [1] 8/12</p> <p>test [1] 33/7</p> <p>text [1] 17/24</p> <p>than [5] 10/22 35/12 40/16 43/6 46/24</p> <p>thank [8] 1/9 4/5 14/13 34/24 44/17 44/20 50/4 51/8</p> <p>thank you [3] 1/9 44/20 51/8</p> <p>that [276]</p> <p>that's [6] 5/15 10/19 12/9 13/20 40/19 44/2</p> <p>their [28] 2/25 4/8 6/15 7/7 8/13 9/17 9/25 17/15 17/16 18/4 19/3 19/6 20/12 22/1 24/13 27/5 31/5 31/25 32/7 32/20 33/5 33/9 36/3 36/25 41/1 46/12 48/19 49/3</p> <p>them [23] 3/6 5/14 6/6 6/16 7/1 9/4 11/1 17/3 17/14 18/4 21/19 26/6 26/8 26/9 30/17 32/20 32/22 32/23 34/23 38/22 38/23 39/11 43/25</p> <p>theme [1] 37/25</p> <p>themselves [1] 9/13</p> <p>then [13] 3/21 8/14 10/11 10/20 11/24 16/2 18/21 24/18 32/1 37/8 42/4 44/6 50/25</p> <p>theory [1] 36/17</p> <p>there [23] 2/2 3/7 7/4 8/2 8/4 8/12 9/3 10/13 14/24 15/2 17/6 18/11 22/6 22/7 25/9 29/9 32/21 33/1 38/25 40/14 43/5 44/12 46/2</p> <p>therefore [1] 5/16</p> <p>these [19] 1/20 2/4 9/15 9/19 12/14 13/15 13/24 16/5 16/8 16/14 18/17 23/13 23/21 30/20 33/7 33/10</p>	<p>33/25 36/18 37/1</p> <p>they [45] 2/22 3/9 3/21 3/22 4/25 6/6 6/10 7/8 7/11 8/10 13/16 14/14 14/15 15/11 15/17 15/19 15/20 15/22 15/22 15/23 16/21 17/1 22/17 24/3 24/12 25/12 25/13 25/25 26/13 26/19 27/2 30/20 31/4 36/1 36/7 36/25 37/16 39/6 39/13 39/14 44/7 47/15 49/18 49/21 50/9</p> <p>They'll [1] 25/13</p> <p>they're [2] 6/20 43/23</p> <p>they've [1] 6/24</p> <p>things [1] 50/21</p> <p>think [11] 15/25 16/11 23/19 34/20 37/1 38/8 44/23 44/23 50/12 50/19 51/6</p> <p>thinking [1] 42/16</p> <p>third [1] 1/3</p> <p>Thirdly [1] 49/4</p> <p>this [65]</p> <p>Thomas [3] 27/7 27/19 28/21</p> <p>those [57]</p> <p>though [2] 11/11 16/12</p> <p>thought [7] 1/19 3/4 16/7 22/14 22/15 36/21 36/24</p> <p>thousands [3] 8/13 8/22 32/12</p> <p>threats [2] 8/10 8/11</p> <p>three [5] 1/16 11/13 25/13 31/22 38/10</p> <p>three weeks [1] 25/13</p> <p>three years [1] 31/22</p> <p>through [4] 5/14 13/11 22/5 33/20</p> <p>throughout [1] 46/16</p> <p>thrown [1] 9/7</p> <p>thus [3] 14/9 23/18 36/11</p> <p>Tierney [3] 17/13 17/21 18/1</p> <p>time [17] 5/12 10/22 11/4 15/7 16/8 22/25 26/1 31/17 35/13 37/5 38/20 38/23 41/18 43/20 46/13 47/21 48/15</p> <p>timely [1] 36/2</p> <p>timetable [1] 26/4</p> <p>today [9] 1/9 1/19 2/3 2/10 3/21 6/2 49/6 49/10 49/25</p> <p>today's [1] 2/23</p>
---	--	---	---	--

T	undertaken [1] 47/16	51/6 51/8	40/11 41/19 50/11	34/8 40/14
told [5] 15/16 15/20	undertook [1] 27/10	via [1] 16/5	50/24	wide [5] 33/7 37/17
35/3 36/23 40/4	undoubtedly [2]	view [1] 44/4	well-founded [1]	39/24 47/11 48/6
too [2] 21/10 25/7	22/25 34/16	visited [1] 33/13	41/19	wide-ranging [1]
took [2] 24/1 25/25	unfocused [1] 11/22	visits [1] 3/24	Wenham [1] 29/4	47/11
topic [3] 42/1 42/6	Union [1] 2/20	vital [2] 9/18 34/9	went [1] 31/20	wider [1] 40/14
43/13	Unions [1] 2/22	voices [1] 32/20	were [29] 3/15 3/17	widespread [1] 40/15
touch [1] 27/6	unique [1] 9/12	volume [2] 14/12	6/6 6/9 8/2 8/4 9/3 9/4	Wilcock [7] 1/22
towards [1] 33/10	uniquely [1] 43/11	45/22	12/13 13/5 14/1 15/16	34/23 34/25 35/2
Trade [1] 2/22	United [1] 43/11	voluminous [1]	15/20 16/15 16/18	44/17 50/11 52/8
Trades [1] 2/20	United Kingdom [1]	22/21	17/17 18/13 18/18	will [90]
Trades Union [1]	43/11	W	19/11 21/16 24/3 27/4	willing [1] 44/3
2/20	University [3] 27/14	want [8] 1/11 3/9 4/4	30/21 36/19 37/4	wiping [2] 22/23
transmissible [1]	30/12 30/16	6/14 22/25 23/6 32/18	38/25 44/6 46/12	23/10
9/21	unless [4] 34/18	33/3	50/21	wish [8] 3/20 15/10
trenchant [1] 39/12	44/12 50/3 51/3	wanted [7] 3/22 4/12	weren't [1] 25/3	23/2 23/9 23/13 23/15
tried [1] 5/24	Unlike [1] 45/10	4/14 6/2 6/18 14/12	Westminster [1]	34/12 34/20
trust [4] 39/11 40/17	unseen [1] 14/15	31/23	36/22	wishes [3] 22/16
41/6 41/16	unvarnished [1]	wants [1] 1/15	what [26] 3/11 4/16	32/5 32/19
try [3] 11/21 25/16	22/14	was [59]	9/4 9/4 9/19 15/5 16/7	within [11] 9/2 13/14
44/1	up [6] 3/1 15/22	wasn't [1] 18/23	16/24 17/5 18/17	25/5 27/15 29/23 43/1
Tuesday [1] 1/1	35/18 37/9 42/3 42/21	Watson [1] 28/22	19/22 22/15 22/17	43/11 45/8 47/21 48/8
turn [4] 10/20 16/2	update [4] 10/20	way [14] 2/3 2/24	24/9 24/16 33/9 36/13	48/12
24/18 32/1	11/11 37/17 50/23	10/19 15/1 16/24	36/23 38/2 38/22	without [2] 40/10
turning [2] 17/9	updated [2] 4/4 32/11	18/12 20/22 25/21	39/23 41/4 41/21 42/4	46/19
45/19	updating [1] 42/18	29/20 39/14 44/22	43/19 46/18	witness [21] 4/8 4/12
two [6] 30/7 33/15	uploaded [1] 48/24	47/7 48/12 51/6	WhatsApp [14] 16/5	6/21 7/6 7/9 7/10 7/18
36/9 38/9 46/6 49/9	uploading [1] 49/2	ways [1] 33/8	16/9 17/24 18/12	11/9 11/13 12/1 14/19
types [1] 16/5	upon [6] 3/7 11/19	we [85]	20/11 20/23 21/20	20/6 21/10 23/1 26/4
U	16/17 17/6 18/21 27/6	we haven't [1] 6/16	21/23 22/2 22/3 22/7	26/18 34/15 39/7 43/6
UK [14] 5/1 8/9 9/6	urge [2] 38/23 43/2	we'll [3] 26/15 44/22	22/8 22/18 40/25	46/10 48/19
9/10 9/25 15/7 17/16	urgency [2] 8/25	50/23	WhatsApps [5] 16/2	witnesses [32] 4/7
27/11 27/15 27/21	38/24	we're [11] 4/6 4/24	17/9 19/1 22/13 23/12	4/17 4/22 5/13 5/17
27/25 32/10 33/7 33/8	urgent [1] 49/11	5/7 16/17 36/1 37/11	when [8] 3/24 16/16	7/8 10/3 11/1 11/3
UK Government [1]	us [14] 3/9 3/24	41/2 44/11 50/19	17/16 26/5 36/25	15/4 21/18 21/20
27/21	10/15 10/24 14/21	50/20 50/20	42/22 50/13 51/7	21/25 23/12 24/12
UK-wide [1] 33/7	15/11 15/19 34/12	we've [15] 5/24 12/12	whenever [1] 6/22	24/21 26/1 26/7 26/10
Ulster [2] 30/12	34/16 34/17 36/3	13/2 13/3 13/4 13/6	where [5] 5/11 25/3	26/17 26/20 28/1
30/16	38/20 39/21 50/12	13/12 25/6 25/8 29/11	25/8 35/20 44/22	31/24 33/25 34/8 41/1
Ulster University [1]	use [19] 17/8 18/25	30/25 40/3 41/11 44/9	whether [6] 18/17	42/6 42/8 42/15 47/14
30/16	19/3 19/4 20/6 20/10	44/16	whichever [1] 40/17	48/18 49/15
ultimately [6] 7/11	20/10 20/12 22/1	web [1] 32/11	41/24 42/15	won't [1] 37/15
16/24 18/22 20/2	22/17 22/18 23/4	website [2] 18/8	which [81]	wonder [1] 41/24
26/11 42/8	23/12 25/22 27/25	33/18	whilst [4] 4/23 7/2	words [3] 18/16 23/5
uncertainties [1]	41/1 43/2 43/19 48/7	week [1] 20/17	22/13 41/4	23/13
41/25	used [3] 18/18 23/7	weeks [2] 25/13	Whitehall [1] 18/2	work [19] 14/14
under [8] 7/15 18/4	23/20	26/15	Whitty [1] 8/7	14/18 14/21 14/23
23/15 25/21 35/14	useful [1] 50/12	welcome [6] 1/11	Whitty's [1] 8/19	17/17 21/12 22/8 30/4
37/14 42/1 48/12	uses [1] 32/24	3/22 27/3 36/12 37/17	who [37] 1/11 1/13	30/11 30/20 32/16
under way [2] 25/21	utmost [1] 37/6	50/1	1/15 1/22 1/24 1/25	35/22 36/16 38/9
48/12	V	welcomes [1] 45/13	2/2 3/15 4/7 7/2 7/8	43/14 44/3 46/4 46/16
underestimate [1]	value [1] 16/6	well [47] 1/13 2/16	12/13 12/16 12/18	48/12
39/15	valued [1] 33/5	4/11 5/1 5/10 5/19	12/19 13/5 13/10	worked [3] 32/13
underlying [5] 5/11	various [1] 47/11	5/24 7/12 10/17 11/3	13/13 13/17 13/18	46/15 47/13
5/16 6/9 6/25 16/19	vast [4] 38/9 41/17	13/1 13/15 13/19 14/6	14/13 26/22 29/4 30/3	working [5] 11/17
understand [9] 5/10	46/18 49/13	14/24 15/5 16/23 18/8	30/9 32/5 32/14 32/21	45/21 47/1 47/22
10/5 18/17 23/6 32/9	version [1] 31/6	18/15 21/5 21/11 22/2	33/2 34/12 34/20	48/15
39/11 40/23 41/21	very [22] 4/1 14/11	24/16 25/21 26/2	34/23 35/24 39/16	worth [1] 7/21
42/7	14/16 15/1 21/9 26/24	26/16 26/21 27/16	42/15 45/16 47/17	would [21] 3/20 3/22
understood [2] 8/23	27/6 29/21 34/24 35/6	27/19 28/16 29/3	whom [7] 3/20 5/5	8/14 13/12 15/17
10/16	39/16 44/3 44/17	29/18 30/1 30/4 30/5	33/1 35/7 37/7 49/6	15/19 15/21 17/11
undertake [1] 32/15	44/19 45/22 46/18	30/13 32/3 34/4 34/15	49/25	17/15 19/23 24/4
	50/4 50/4 50/8 50/12	36/7 36/15 36/22 40/1	whose [2] 3/17 26/24	32/18 32/21 33/3 33/5
			why [4] 7/22 34/7	34/20 37/16 40/5 43/5

W

would... [2] 44/13
47/8

wouldn't [1] 32/14

writing [5] 5/18 7/19
38/2 40/9 44/10

written [13] 7/7 7/14
9/17 24/13 26/6 35/15
37/25 39/13 41/11

43/4 43/24 44/2 44/15
wrote [4] 17/13 17/21
18/1 18/24

Y

year [6] 26/6 33/15
33/21 35/24 43/16
47/6

yearning [1] 39/3

years [1] 31/22

yet [4] 26/22 33/24
40/6 42/9

yield [2] 21/22 22/13

you [57]

you'll [1] 44/23

you're [3] 27/7 28/12
34/20

you've [1] 35/3

your [22] 4/2 23/3

28/6 28/9 35/6 35/8

35/22 36/13 37/6

37/17 37/22 38/4 38/4

38/13 39/6 39/20

41/10 42/5 43/15

49/10 50/1 50/1

your Ladyship [4]

35/6 37/6 38/4 49/10

Ó

Ó Muirugh [1] 2/10