

A. Background, qualifications and Cabinet Office role during Covid-19

1. Prior to joining Number 10, I attended Manchester University to study Politics and International Relations. I graduated in 2003 with first-class honours. After graduation, I spent a year as editor of the student newspaper. I then studied a one-year postgraduate diploma course in newspaper journalism at Cardiff Journalism School, following which I joined the Press Association as a graduate trainee in 2005. I was appointed Home Affairs correspondent at the Press Association before joining the Daily Mail, again as a Home Affairs correspondent. In 2014, I moved to the Lobby to be a political correspondent. From Westminster, as Executive Editor (Politics) and then Associate Editor (Politics) I wrote the newspaper's leader column, political analysis, and political features as well as reporting on government and politics before leaving to join the government in February 2020. Before entering No10, I had a wide range of contacts within government, including No. 10 and the Cabinet Office, as a result of my time at the Daily Mail. These included the Prime Minister himself and members of his political team, including Ben Gascoigne, Lee Cain, NR and Rosie Bate-Williams. I also worked with the then Prime Minister's Official Spokesperson (James Slack) at the Daily Mail.
2. I was approached shortly after the 2019 general election to become Press Secretary at Downing Street and resigned from the Daily Mail shortly afterwards. I began work at Downing Street on 17 February 2020 and was employed there until 18 February 2022.
3. In April 2021 I was appointed Director of Communications, although I was acting in the role from March 2021 following the resignation of my predecessor, James Slack. All roles were as a political Special Advisor. I held the title of Deputy Director Of Communications from late 2020 following the appointment of Allegra Stratton to take a media-facing role as Press Secretary, but my duties were largely unchanged.
4. When I was Press Secretary, my main function was to brief the media and respond to questions from the lobby - reporters from newspapers, broadcasters and websites - as a spokesman for the Prime Minister and the Government. This included appearing at an on the record lobby briefing after Prime Minister's Questions (PMQs) on a Wednesday. These briefings continued through Covid but were largely conducted remotely during periods of restrictions. I also played a role with the Director of Communications, the Prime Minister's Official Spokesperson and other members of

the No10 Press Office in briefing the Prime Minister ahead of Covid press conferences and television interviews. I would often accompany the Prime Minister (PM) when he was travelling on visits to brief him on likely questions from the media and on the government's response, relying heavily on the No10 press office team who were responsible for pulling together daily scripts for the lobby briefings to journalists. In this job, I was not part of the inner circle of the Prime Minister's most senior advisors within No. 10 who were handling the Covid strategy and policy response, but instead advised the Director of Communications on our communications strategy, tactics, lines to take and media handling. When I attended Covid ministerial meetings, it was purely in the capacity of an observer. Where I had any advisory role, it was to help policymakers understand the state of public opinion and the likely public, broader stakeholder and media response to proposed changes to Covid rules and guidance. I was part of a team of communications special advisors and officials who were responsible for the overall shape of government communications, PM visits, ministerial broadcast rounds and the communications grid. Both the special advisor team and the No10 press office had individuals with dedicated covid responsibilities.

5. When appointed as Director of Communications in Spring 2021, my role changed significantly. From this stage, I reported to the Chief of Staff, Dan Rosenfield, and directly to the Prime Minister. I became the principal advisor to the Prime Minister on communication strategy and planning and I played a much more significant role in Covid communications and government communications more widely. I also attended all the Prime Minister's Covid meetings, including the dashboard and Covid committees, to advise on our communications approach. I would also be aware of decision-making and policy formulation by other departments such as the Department of Health, HM Treasury and Department for Trade at a much earlier stage, and would advise Covid Taskforce and senior No. 10 staff on communications in relation to our Covid strategy. I attended the PM's morning meetings and the 'stand up' meeting of senior staff which took place immediately beforehand and would summarise for the senior No10 team and the live communication issues of the day and highlight anything which might require particular attention or would likely be a focus for questions at lobby.
6. I believe I can be most helpful to the inquiry around the decision-making points after March 2021 when I was more involved, including the execution of the Covid Road Map in Spring 2021, on decisions made on restrictions during 2021. My role involved advising Covid policy makers, including the Prime Minister, on the state of public opinion and the likely media, public and political reaction to policy decisions, and on

shaping our Covid communications strategy. I also played a coordinating role in the campaigns around our vaccination effort, including *Get Boosted Now*.

7. The key decision-making points in which I was involved were around the opening up of the country in the Spring of 2021 and around the Omicron variant in the winter of 2021, from the point of view of government communications.
8. In terms of local and regional authorities and the devolved administrations, policy communication and communications coordination was not conducted by me either as Press Secretary or Director of Communications. This was done at an official level and not by political appointees. There was monitoring of the Scottish and Welsh government's policy decisions which we used to inform our communication approach.

B. Initial understanding and response to Covid-19 during Jan-March 2020

9. In relation to my initial understanding and response to Covid-19, I joined Downing Street after Covid had already entered the UK. The Covid-19 public information campaign launched on 2 February 2020, having already been discussed by Chief Medical Officers in January. I did not join the government until 17 February 2020.
10. It was a very challenging time for the government at the start of the pandemic. Decisions were being made very quickly with limited information and understanding of the new virus.
11. In communications, the Director of Communications at the time, Lee Cain, set up a morning meeting involving departmental directors of communications, other communications officials and Special Advisors (SpAds) from relevant departments to coordinate our communications response. Additional support was brought in to the No10 communications team to assist with the significant workload.
12. Information was coming in to No10 from the Department of Health and Social Care, as well as the scientific advisors, Sir Christopher Whitty and Sir Patrick Vallance and special advisor channels including the Health Secretary's special advisors and the media. At a time when understanding of the virus was very limited and policy-making was moving very quickly, the No10 Press Office played an important role at the front line of communicating our policy response.

13. The initial proposed action within No10, in terms of communications, was that Lee Cain (the then Director of Communications) set up daily press conferences so that the Prime Minister and his scientific advisers could address the public and media directly about the decisions being made and the scientific advice that was informing our decision-making. This model was used to a greater or lesser degree throughout the pandemic. Press conferences were particularly helpful when new information about restrictions needed to be imparted to the public. They also provided a focal point for the country and were watched by many millions of people. They helped us communicate our core messages including '*Stay Home, Protect the NHS, Save Lives*'. At the start of the pandemic, information was patchy and understanding of the scale of the problem incomplete. Over time the government's ability to understand and respond to Covid improved as did its decision-making and communications. Like many countries, the UK was not well-equipped to handle the pandemic (stores of PPE, for example) and had to work out its responses based on rapidly evolving new information and scientific advice. This was entirely new - a once-in-a-century pandemic - and there was an element of building structures and working approaches as time progressed. In No10, we called on additional resources from the Cabinet Office and elsewhere in government to bolster our staff numbers. Lobby and press conferences became an even more critical element of government communications and accountability as it was where journalists could ask questions about and challenge the government's response.
14. Internally, communications also played a critical role in helping policymakers evaluate the practicalities of particular restrictions and how the public were likely to interpret them. Were they easy to understand, would they be unpicked by the media and seen as impractical or unwieldy by the public and relevant delivery agencies? This was particularly an issue when we were coming out of a period of restrictions, as something which was clear cut in lockdown might become more difficult to explain and understand when restrictions were relaxed.
15. I think as the pandemic progressed, the government got better at handling the main policy response in the form of restrictions and were better at communicating them. Simplicity and clarity were critical for compliance and understanding. There were some notable successes in the form of the vaccine taskforce and vaccine rollout campaigns, and in respect of the latter, communications played a significant role.

16. In relation to herd immunity, I do not believe we spoke about it in our communication decisions or any policy-making meeting. The first time I heard this expression was when Sir Patrick Vallance said it at a press conference in early March 2020, although there was an understanding that immunity would spread in the population over time. I am not the appropriate person to answer the question whether the scientists were proposing the strategy and if it was accepted by the Cabinet Office. Herd immunity was not the 'strategy' that we were talking about internally.
17. This initial strategy was the one the Prime Minister set out at the press conferences which he referred to as '*squashing the sombrero*' - an acknowledgment that depressing the peak and spreading cases over time would limit the impact on the NHS and save lives. This was articulated clearly by the Prime Minister and his scientific advisors in March 2020. We went into our first lockdown shortly after this strategy was communicated. I was involved in drafting, proofing and editing the Prime Minister's address to the nation about lockdown.
18. I did not provide advice on the policy around community testing, however I was involved in the media handling around the expansion of testing.
19. In relation to what went well, I believe that the levels of public awareness of and adherence to Covid rules was improved by the direct communications strategy adopted by the government at the Covid press conferences, as detailed above. We also successfully used focus groups and polling data which helped us understand the public's understanding of the restrictions and their responses to our actions. This helped us understand what messages worked well and how we could best communicate in such a way as to maximise compliance and understanding with the regulations and guidance.
20. In the early part of the pandemic, the structure of government decision-making around what restrictions should be put in place was informed by submissions from individual government departments as well as the policy-making functions within Cabinet Office and No10. As these tended to mirror existing producer/industry relationships there was a focus on sectoral responses and policy making tended to be shaped by officials' understanding of the relevant sectors. This was an effective way of handling, for example, the transport sector or retail. However, when it came to policy-making around social relationships there was no responsible department and a perception among some communications advisors that these issues were, as a result, given lower priority because they did not have dedicated advocates within any department. This was one

area where experience of policy development and communications improved markedly after the first set of rule relaxations in the Spring of 2020.

C. Non-pharmaceutical interventions (NPIs)

21. It is my understanding that there were accounts of the warning and analysis of the NHS being overwhelmed by the Covid-19 virus, which I believe led to the UK lockdown policy strategy, but I was not directly aware of this work, nor was I involved.
22. I was involved in helping communicate the government's approach to lockdown by helping prepare the Prime Minister for press conferences and arranging policy announcements for those conferences as well as day-to-day media engagement and our digital communications.
23. I do not believe I am qualified to give an opinion or provide answers to understandable questions on the timeliness of the Government's decisions to adopt national lockdowns throughout the pandemic. Ministers, officials and advisers in my experience worked tirelessly under very difficult circumstances to try and make the best decisions they could when the choices were between several 'bad' or damaging options and information was incomplete and did not present a course of action without highly significant consequences. The experience of health services in Italy and elsewhere informed concerns about the NHS being overwhelmed and the desire to avoid this, and ensure anyone who needed treatment could get it, was a live and very real consideration.
24. In terms of the three national lockdowns, I was involved in how the Covid lockdown policy was communicated, not in the policy or decision-making process itself except to the extent set out in the paragraphs below, and the same is true for regional restrictions, circuit breakers, working from home and self-isolation requirements as well as the closure of schools. I was an observer in some of the policy making discussions to understand what was being discussed and announced. I did not make any active contributions to these discussions.
25. I do not know or recall when lockdown was first contemplated, when it was decided as the strategy, by who or who recommended the strategy and their reasoning. I was involved in the decisions relating to face coverings and border controls to the extent that communications provided feedback on public and media attitudes and that context

was considered as part of policy decisions. However, I was not involved in any decisions or advice other than providing feedback on the public reactions to the policy.

D. Medical and scientific expertise, data and modelling

26. I was not involved in these areas.

E. Covid-10 public health communications

27. As Press Secretary, I was involved in setting up press conferences, preparing media announcements to be made and briefing ministers or the Prime Minister on likely questions from the media throughout my time at No. 10 as well as direct media engagement. No10 Comms was on the front line of the media response and the function of lobby briefings and No10 Press Office was often to drive other parts of government to provide answers to questions about policy decisions.

28. Generally, briefings were prepared through the mechanism of the opening address, which was written by the speechwriters, with policy input from the PM's Private Office and supported by communications. Members of the media team would then attend a pre-briefing with the Prime Minister or other ministers and the scientific advisers who were with the minister to talk through issues which they believed were likely to arise.

29. Communications also played a critical role in the vaccination effort, building public confidence in the Covid-19 vaccines, particularly the *Get Boosted Now* and vaccine uptake campaigns, run through with Cabinet Office officials. There were also regular meetings involving No. 10, NHS England and the Department of Health and Social Care to coordinate our efforts. This was particularly important with regard to improving the uptake among hard-to-reach groups and communities with lower uptake rates.

30. This effort also involved close cooperation with Kate Bingham and the Vaccine Taskforce. Ms Bingham has documented some of her engagement with me in her book 'The Long Shot':

On the evening of Thursday 12th November, I read press reports that Lee Cain would step down as director of communications. Following Cain's abrupt departure, Boris told me to work with Jack Doyle, who turned out to be professional, pragmatic and polite.

How differently history might have been if all the VTF's government media interactions had been handled by Jack Doyle from the start.¹

31. The process of producing and coordinating the Prime Minister's press briefings started with daily press conferences at the height of the early pandemic and then reduced the frequency over time so that they were more focused and took place when announcements had to be made.
32. We got into a routine of having press conferences linked to and close to decision-making points to help reduce the risk of leaks.
33. Sir Chris Whitty and Sir Patrick Vallance attended routinely although sometimes other scientists and public health figures stood in to explain the state of the pandemic and our policy responses.
34. We would inform the broadcasters that a press conference was coming, usually on the day. Initially these aired on network channels and sometimes at prime time. No10 Comms liaised with the broadcasters to fit around their schedules and to maximise viewership.
35. The use of a direct address of the kind the Prime Minister made at the start of the pandemic was an alternative approach that allowed for more direct communication with the public from the Prime Minister as leader of the government's pandemic response and clearly demonstrated the gravity of the situation facing our country and its people.
36. In relation to the UK Government's public health communications during Covid-19, I believe that the press conferences generally worked well when we had an announcement to make. The public feedback and the viewing figures for them were high.
37. Over time, they became less useful and productive when there was nothing to announce and the minister who was speaking at the conference was not sufficiently

¹ 1. Kate Bingham and Tim Hames, *The Long Shot: The inside Story of the Race to Vaccinate Britain* (London, England: Oneworld Publications, 2022), p.283.

across the policy to be able to answer the detailed questions from the media.

38. There were communications mistakes made during the Covid pandemic, when messages were contradictory, complex, unclear or entered the public domain before policy was fully formed. Lockdown, for example, was fairly simple to understand and communicate, but when we opened up the country, there were difficulties with working out how you would implement and explain the further restrictions on people's lives.
39. Sometimes we pre-briefed new announcements to the media which were not easy to understand and explain. The second slogan '*Stay alert, Control the virus, Save lives*' was one such occasion. There was a difficult balance to be found between communicating via the media, preparing the ground for new decisions via these briefings and presenting the information directly to the public. We did not always get this right.
40. The other major issue was leaks of information. Policy announcements would leak from the Department of Health, other government departments and No10 and undermine the coherence and structure of the government's response which was built on the grid we used to manage announcements.

Key decision-making points

41. During the first part of my tenure as Director of Communications, the government's communications strategy was centred around the Covid-19 Road Map. This set out the rationale by which we would take decisions - the 'four tests':

the vaccine deployment programme continues successfully; evidence shows vaccines are sufficiently effective in reducing hospitalisations and deaths in those vaccinated; infection rates do not risk a surge in hospitalisations which would put unsustainable pressure on the NHS; our assessment of the risks is not fundamentally changed by new Variants of Concern.
42. The roadmap also set out the likely decision making points and timing, and this document performed a critical role as a communications tool. It was designed to build confidence among the public in the government's ability to take the country and the public from where we started, with significant levels of restrictions in place, and widespread concern about the prospect of a return to normal, to the end point where

- there would not be significant restrictions in place and we would rely on guidance and the protection afforded by vaccines. I do not intend to rehearse the arguments around all of the Covid decision-making points in the period when I was Director of Communications. They played out very publicly at the time, the parameters of the scientific input and decision-making framework are well understood and will be better explained by the scientific advisers and the ministers making the decisions.
43. Largely, communications considerations and input were not critical to actual decision-making beyond the processes outlined above - as a sounding board and challenge to policymakers, and in coordinating the government's strategy and messaging at a time of significant polarisation in public and media sentiment around the Covid strategy. I have also outlined below the role no10 comms played in driving the wider government effort to encourage vaccine uptake. However, I think there are two points at which the role of communications was more pronounced which merit the inquiry's attention: Road Map Step 3
44. After the decision had been made - and announced - to proceed with Step 3 of the road map - a significant step forward in relaxing the rules that covered a wide range of sectors, but before it was implemented, there was a proposal from the Department of Health and Social Care (DHSC) to consider reversing or delaying that step because of concerns over rising numbers of cases and a new variant, Delta. The argument successfully made by No10 officials, including communications advisers, was to proceed with Step 3; T because, since the number of hospitalisations and deaths had not increased, it would be difficult to explain why we would be reversing the decision already taken, and to justify and provide the evidence of why this was necessary against the Government's rationale for our decision-making as stated within the road map.
45. Such a reversal at this late stage would have had a damaging impact on public confidence in our decision-making. But also, the fact one could not gather the evidence for why such reversal was necessary, when we had argued to that point that vaccines were helping to break the link between rising cases and hospitalisations and deaths, suggested that reversing the move to step 3 was not justifiable on our own wider arguments.
46. To have failed to make the relaxation at that stage, when hospitalisations and deaths had not increased, would have undermined trust in vaccines as a facilitator of further relaxation in the future when our argument was precisely that vaccines would

significantly help achieve that relaxation. Consequently, the highly precautionary approach then being advocated by some, which had - rightly in my opinion - been applied earlier in the pandemic, should not, given the level of vaccination in the population, at that stage prevent the move to Step 3.

The alternative scenario of reversing the decision to move to Step 3 would have been hugely difficult to communicate to the general public. In this situation, insight from communications professionals about the state of public opinion and the challenge in explaining a potential decision highlighted a change of context that had not, at that stage engendered a change in the parameters around the factors relevant to how a decision was made.

47. The resulting decision was made to proceed as planned but monitor the data carefully such that further interventions could be made if they were required. This in turn led to the delay in proceeding with stage 4 of the roadmap.

48. Get Boosted Now

Three major pillars of the vaccine effort are evident: the extraordinary success of Kate Bingham and the Vaccine Taskforce in securing jabs, the speed of the regulatory bodies in compressing their approvals processes, and the effectiveness of the NHS in delivering jabs at speed.

49. But there is a fourth which the inquiry should also consider: the communication campaign to build confidence in the vaccine effort. A genuinely cross-governmental campaign, this was led by Claire Pimm in the Cabinet Office, NHS communications leadership (principally Simon Enright and James Lyons), DHSC Communications and involved to a lesser degree other departments and Number 10 communications, which performed a coordinating and 'challenge' function. There were some genuinely innovative communications tactics used here, notably the nationwide text message alerts.

50. This was a success of strategic communications, which built public confidence, in particular among hard to reach groups and the vaccine hesitant, over a significant period. Measurable sentiment changes were seen over time among ethnic minority groups showing a growing enthusiasm for jabs as a way out of Covid. It would be wrong to take this for granted, especially given the significant challenges presented by opponents of vaccination, misinformation, vaccine conspiracy theories and in

particular criticism of the Astra Zeneca jab from the likes of the French President Emmanuel Macron.

51. International comparisons at the time showed the UK's levels of vaccine enthusiasm to be higher than in many other countries, having improved significantly from when the vaccines were first administered. The Prime Minister and other ministers played an important role in this - I recall the PM's visit to a south London evangelical church as just one instance - as did newspapers, notably The Sun's Jabs Army campaign, and other media outlets.
52. This formed an essential foundation of the decision by the PM to launch 'Get Boosted Now' as we wrestled with the Omicron variant in 2021 -- originally suggested by the then-Chancellor, Rishi Sunak.
53. The result was that demand for jabs was not a significant limitation on our ability to vaccinate at speed at this point, and when the NHS moved to deliver more jabs, even more quickly, vaccine hesitancy was much lower than it might otherwise have been.
54. Alleged breaches of rules. By the time Boris Johnson and Rishi Sunak and others were found to have broken the rules, the restrictions had ended and therefore I do not believe there was an effect on the public confidence in the UK Government's response to Covid 19
55. However, in respect of earlier revelations about a No10 adviser, I think it is hard to know without doing a data analysis on whether there were consequences for public observance of the rules, while acknowledging the significant level of understandable public opprobrium.
56. I was involved, with others, in handling the initial No. 10 media response to the subsequent allegations involving other breaches in No10, Cabinet Office and elsewhere in government. These issues were considered in detail by the Commons Select Committee of Privileges ('the Privileges Committee').
57. I also gave oral evidence to the Second Permanent Secretary's Investigation into Alleged Gatherings on Government Premises During Covid Restrictions -- "the Sue Gray Inquiry" in late 2021.
58. The media lines we issued at the time were based on our best understanding of the situation and our belief that rules had not been broken. When it became apparent

during the course of the Sue Gray investigation that these lines could not be sustained, we stopped using them.

59. Very soon after the initial reports of allegations of rule breaking, I advised the Prime Minister to set up an internal civil service inquiry into these allegations, which became the Sue Gray inquiry.

60. In terms of the environment in No. 10 after the breaches surfaced, changes were made to the rules around alcohol use within the building and the Prime Minister made structural changes to his No. 10 team, including the appointment of a Permanent Secretary within No. 10 to take a more direct role in managing the building.

F. Public health and coronavirus legislation and regulations

61. I believe that I have already covered my limited role in providing advice and briefings to the Prime Minister and others and provided my views on the effectiveness of areas in which I feel qualified to give an opinion.

G. Key challenges during my tenure and lessons learned

62. There were enormous challenges across the two years when I was serving in government. The biggest communications challenge was to explain the necessity of the government taking and implementing unprecedented powers to restrict and regulate people's lives, and the complex detail of how the people were to operate, while maintaining public confidence in the steps the government were taking at a time of enormous uncertainty and public anxiety.

63. This communication challenge was amplified by the fact that we were operating in a global 24/7 news media environment in which social media also played a very significant role in promoting misunderstanding, misinformation and conspiracy theories. Under those circumstances, it was hugely difficult for government to hold public attention and deliver a sustained message over time although we had some successes. Some of this was compounded by the impact of leaks which were so frequent and sustained that they made it very difficult to plan and prepare communications.

64. At a more local level, those who worked on the front line of the pandemic within the civil service and Number 10 were stretched to breaking point given the enormous demands and the workload pressures.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

SIGNED:  _____

29 September 2023