

Witness Name: Graham Medley

Statement No.: 02

Exhibit:

Dated: 5 December 2023

Ref: M2/SAGE/02/GM

UK COVID-19 INQUIRY – MODULE 2

SUPPLEMENTARY WITNESS STATEMENT OF PROFESSOR GRAHAM MEDLEY

I, Professor Graham Medley OBE, of the Department of Global Health and Development, London School of Hygiene and Tropical Medicine, will say as follows: -

1: Introduction:

- 1.1. I make this statement further to my witness statement dated 4 September 2023 and my oral evidence given to the Inquiry on 12 October 2023.
- 1.2. The purpose of this statement is to provide necessary clarification to an identified inaccuracy in the oral evidence given on 12 October 2023.

2: Knowledge of concerns raised by SPI-M-O and the Potential Impact on the NHS outside of the immediate secretariat

- 2.1. On 12 October 2023 Inquiry Counsel Andrew O'Connor KC asked me the following series of questions for which line reference to the *2023-10-12-Module-2-Day-8-Transcript* is provided hereunder for ease of reference:

"I want to stay on this subject but move on to a slightly different issue, which is the NHS, and which – as we know, the cause of the NHS, whether it would be overwhelmed or not, became a key issue. If we look at paragraph 4.9 of your statement at page 43 –"...

(page 130, lines 18 – 23)

"No. Let's just look at this paragraph, Professor. It's the second sentence:

"Throughout February 2020 it became increasingly clear..."

And I take it you mean – well, is that clear to you, clear to SPI-M-O?

...

"...that NHS capacity in the UK would be overwhelmed."...

(page 131, lines 2 – 7 & 9)

"And you say that SAGE asked a working group to be set up to discuss the extent of the overwhelm. Now, we may hear from those, for example, in Number 10 that this prospect of the NHS being overwhelmed wasn't something that at the very least they adverted to until a couple of weeks later than the end of February, in mid-March.

But are we to take it from this that – not the possibility but the certainty of NHS capacity being overwhelmed was something that was clear to you and to SPI-M-O during February?"...

(page 131, lines 11 – 21)

"Well, Professor, just looking at this statement, and maybe you want to qualify or change it, looking at the statement, what you say is it became increasingly clear that capacity would be overwhelmed, and all you were doing with the NHS was talking about the extent of the overwhelm?"...

(page 132, lines 17 – 22)

2.2. I subsequently provided the following response:

"I don't think it's recorded in the minutes, but just to make it clear, so Dominic Cummings' iPhone X, for example, attended all of the SPI-M-O meetings, even those, I think, pre-pandemic. Whether it's recorded in the minutes I'm not sure, but, we -- as I said, there was a whole host of people phone -- people phoning in from across government. So even if it might not be in the paperwork, but I'd argue about that, it was known."...

(page 133, lines 5 – 12)

- 2.3. Following the conclusion of my evidence, I reviewed the transcript of my evidence and noted points which could be classed as an inaccuracy and are worth correcting.
- 2.4. First, I wish to bring to the Inquiry's attention that the redacted minutes of the SPI-M-O meetings recorded a number of observers, but I have myself never been in possession of the unredacted copies of such minutes as the versions signed off did not include the list of observers.
- 2.5. Second, regarding the timing of "Dominic Cummings' iPhone X" remote attendance at meetings, I acknowledge an error in my testimony. Such remote participation did not occur prior to the pandemic as previously stated, but rather during the period leading up to the decision to impose further restrictions circa mid-March 2020. Meetings held before 23 March 2020 were in person, not remote, and I recall seeing names during those in-person meetings.
- 2.6. Despite this revision of my oral testimony, I emphasise that the central point of this portion of the evidence remains intact: Other government officials attended as observers throughout the period leading up to 23 March 2020, and therefore concerns raised by members of SPI-M-O and the potential impact on the NHS were known beyond SPI-M-O and its immediate secretariat.

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 of its truth.

Personal Data

Signed: _____

Dated: 5 December 2023