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Exhibits: LF3
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UK COVID-19 INQUIRY
MODULE 2A

WITNESS STATEMENT OF THE DIRECTOR GENERAL CORPORATE

Further to the issues raised by the Rule 9 notice dated 10 March 2023 served on the Scottish Government, in connection with Module 2A, the Director-General Corporate (DG Corporate) will say as follows: -

Introduction

This statement is one of a suite provided for Module 2A of the UK Covid Inquiry and these should be considered collectively. This statement has been prepared to address further questions from the Inquiry and should be considered an addendum to the statement provided for Module 2A by DG Corporate on 23 June 2023.

The Effectiveness and Reach of Public Health Messaging

The Approach to Public Health Messaging During the Pandemic

1. Scottish Government Communications sought to reach the population of Scotland as frequently as possible in the most cost-effective way, with accessible information that could be easily understood, and would motivate and prompt life-saving action by adopting protective behaviours.
2. Communications priorities were informed by policy, clinical and ministerial decisions and directed by the latest and continually emerging scientific evidence. Scottish Government Communications was in regular contact with counterparts in the UK Government and other

devolved administrations, to seek alignment of information and advice to the public where possible, later ensuring plans were in place, as far as possible, in the approach to advice, such as on the use of face coverings.

3. Planning was also informed by representatives from Scottish Government Communications attending key forums within the Scottish Government such as Scottish Government Resilience Room (SGoRR) and Four Harms Group.
4. The communications approach shifted during the summer of 2020, when preparations for the easing of restrictions were taking place. While a broad approach was still appropriate in some cases, in others a more targeted approach was taken for Scottish Government Communications work which reflected the needs of different audiences and their behaviours at that time.
5. During the early stages of the pandemic, Scottish Government Communications messaging focused on encouraging adherence to key behaviours. Subsequently, the communications ask broadened, reflecting the focus on the “four harms” approach associated with managing the impact of the Covid-19 pandemic. Details of the four harms approach can be found in the Module 2A DG Strategy and External Affairs corporate statement provided to the Inquiry on 23 June 2023. This shift included efforts to reach and support those dealing with mental health impacts of the pandemic, communications to highlight available financial support, support for those suffering domestic abuse and support for businesses.

First Minister's Daily Briefings

6. The First Minister's daily media briefings were fundamental during the early stages of the pandemic in reaching as many people in Scotland as possible to provide health-related advice to minimise transmission risk.
7. The briefings were used as a key means of disseminating information to the public, quickly and clearly, backed up with news releases, media interviews and content on the Scottish Government website and social media channels.
8. The First Minister held more than 250 media briefings, joined by Ministers, clinicians and experts. Briefings were supported by Scottish Government Communications who made any factual and clinical information on the range of topics discussed accessible to the general public. This included updates in relation to the easing or tightening of restrictions and information

regarding the roll-out of the vaccination campaign and re-assurance of vaccine safety and efficacy.

The Reach and Effectiveness of Public Health Communications in Scotland

9. Scottish Government Communications set up regular opinion polling at the start of the first lockdown to help understand knowledge, attitudes and claimed behaviour in relation to Covid-19, and motivations and barriers to adopting desired behaviours. This ran weekly from the end of March 2020 to June 2021, when it moved to fortnightly and then approximately monthly from April 2022. The questionnaire was developed to cover both ongoing metrics to monitor trends but also new questions to address topical and emerging issues. The report was prepared and circulated widely across the organisation, informing decisions not just related to communications. It also tracked the extent to which people felt clear about what was required of them and the extent to which they trusted and felt helped by Scottish Government communications. It allowed identification of particular groups where compliance or belief in the value of the restrictions was lower to enable the development of targeted communications interventions in response. The full suite of Scottish Government Communications opinion polling research data tables are provided: [LF3/0001-INQ000249225] [LF3/0002-INQ000249226] [LF3/0003-INQ000249227] [LF3/0004-INQ000249228] [LF3/0005-INQ000249229] [LF3/0006-INQ000249230] [LF3/0007-INQ000249231] [LF3/0008-INQ000249232] [LF3/0009-INQ000249233] [LF3/0010-INQ000249234] [LF3/0011-INQ000249235] [LF3/0012-INQ000249236] [LF3/0013-INQ000249237].
10. Messaging intended for the general public was featured in advertising from April 2020 onwards on broadcast channels including TV, radio, outdoor posters and digital channels. Media channels were chosen to ensure tailored messaging reached relevant audiences. For example, the campaign to inform those that were at a higher risk of contracting Covid-19 with restricted ability to leave their home that they could contact a new telephone helpline to arrange assistance with sourcing shopping or collecting prescriptions were reached through TV, video on demand, print, digital and radio, with daytime TV and regional newspapers used within this media mix to maximise audience reach. Media coverage figures provided by the media buying agency for Covid-19 communications showed 98% of adults in Scotland aged over 70 were reached, resulting in 14,000 calls to the helpline noted above.
11. Consistent, clear and credible messaging shared through the First Minister's media briefings, news coverage and marketing activity continued to build trust in the Scottish Government's approach to saving lives and reducing harm during the Covid-19 pandemic. At the start of 2021,

weekly polling showed that 67% of adults aged over 18 in Scotland said they trusted the Scottish Government to deliver information on Covid-19 in contrast with 26% who trusted in the UK Government. Although levels fluctuated during the pandemic, the significant difference was consistently evident.

12. On Monday 2 November 2020, as Covid-19 protection levels were introduced to each area of Scotland, a postcode checker tool was launched on the Scottish Government website to allow citizens and businesses to quickly confirm local levels. This included a clear breakdown of the rules and restrictions in place for that level and links to further advice and guidance to support awareness and compliance. This tool was widely promoted in accompanying marketing campaigns. From launch until the tool was decommissioned in August 2021, it had over 2 million users accessing the tool over 3.2 million times.
13. The following examples are an indication of the impact and effectiveness of communications activity and key campaigns during the pandemic:
 - 4.35 million people in Scotland were exposed to the first vaccination paid-for-media marketing campaign. 78% of campaign recognisers agreed that the Scottish Government Covid-19 vaccine communications made them more aware of the importance of being vaccinated
 - Among the 4.2 million people who had the opportunity to see or hear the original 'We Are Scotland' compliance campaign (June 2020), campaign evaluation research showed that 81% agreed that they found the advertising supportive and 79% claimed to take a relevant action as a result
 - The 'Not Giving In' compliance campaign (April 2021 to June 2021) reached at least 4.4 million people. Subsequently, around seven in 10 people consistently rated themselves as completely or mostly compliant for the duration of the campaign following a decline prior to this from weekly polling. 75% of those who saw or heard the first burst of this said they took action as a result
 - Lateral Flow Device (LFD) testing almost doubled with support from the 'Reminder' and 'Riskometer' campaigns. At least 4.4 million people had the opportunity to see or hear these campaigns and the polling showed usage of LFD tests by more than half of the adult population (55%) by October 2021 following these campaigns, increasing from 29% at the end of June 2021

- In the wake of the Omicron variant, the 'Living Safely This Winter' campaign reached 4.5 million people in Scotland. Campaign evaluation research showed that the campaign was seen or heard by 84% of adults and three quarters of those were driven to take protective action as a result. From March 2020 to March 2021, over 24 million 'users' viewed content on the Scottish Government website relating to Covid-19. From March 2021 to March 2022, over 23 million 'users' viewed content relating to Covid-19. In these instances, content relating to Covid-19 is defined as containing 'coronavirus' in the web address. The highest ever traffic on a single day was on 4 January 2021 with 1,730,438 page views for *Scotland in Lockdown*, provided: [LF3/0014-INQ000249238].

Inclusive Communications

Accessibility for Vulnerable and Minority Groups and Non-English Speakers

14. Scottish Government Communications worked with NHS24, Public Health Scotland (PHS), Scottish Government policy teams and third sector partners to ensure key public health information was available in multiple languages and accessible formats via the NHS Inform website. British Sign Language (BSL), easy read and audio versions of core campaign information were produced for key Covid-19 guidance.
15. The need for public bodies to make information available in accessible, inclusive ways was a consistent theme during the pandemic, when public health information was being rapidly created and disseminated. Successes, such as the prominence of BSL interpreters at key briefings, were welcomed by stakeholders. The needs of diverse communities saw individuals experiencing unequal access to health-related information, language barriers, different literacy levels, cultural factors and religious beliefs. Groups who are more likely to experience unequal access to information include minoritised communities such as the Gypsy and Traveller communities, disabled people, non-English speakers, asylum seekers and refugees.
16. Engagement took place with policy teams, the public and third sector partners to understand language and accessibility needs, resulting in key Covid-19 content being provided in 17 languages and accessible formats on the site's Information Hub [LF3/0015-INQ000249239].
17. Scottish Government Communications worked with stakeholders to share Covid-19 guidance with minority ethnic communities, with partnership marketing activity seeking to help amplify communication messages. Covid-19 messaging was delivered by stakeholder outreach and

community voices, which helped deliver communications inclusively. Co-creation with seldom heard groups also enabled Scottish Government Communications to adapt material for cultural considerations and barriers, which were further amplified by trusted voices within these communities.

18. Bespoke vaccine communications including a Ramadan film created in partnership with the British Islamic Medical Association (BIMA), an unpaid carers video featuring Dr Punam Krishan and translated 'walk-throughs' of large and small vaccination sites were created. A video on vaccination was also created in collaboration with minority ethnic stakeholders to provide facts on the Covid-19 vaccines, seeking to address barriers to vaccine uptake identified by minority ethnic communities. This was distributed via partnership channels and minority ethnic stakeholders to communities that traditional media channels may not reach.
19. Paid-for-media activity was also increased for minority ethnic audiences, reflecting the disproportionate impact of the pandemic on these groups. This meant that more resource was put in to reaching these groups. Engagement with community and faith leaders as local trusted messengers for the 'Roll Up Your Sleeves' Covid-19 vaccine campaign was crucial to help overcome barriers to uptake.

Development of Inclusive Communications

20. The National Vaccine Inclusive Steering Group provided a forum for faith, community and other relevant third sector organisations to input and provide feedback on the Scottish Government's approach to inclusive communications. The steering group membership also provided scope for dissemination of relevant communications to specific communities. Ongoing engagement with the National Vaccine Inclusive Steering Group continues to provide opportunity for communities to feed back on the Scottish Government's inclusive approach to communications and, if necessary, inform any adaptations.
21. The Scottish Government worked with public and third sector partners to understand messaging, language and accessibility requirements. Co-production of materials included working with relevant third sector stakeholders, such as the Scottish Refugee Council, to design and distribute targeted communications. This included work with charities to support those who experience substance misuse, asylum seekers, refugees, and women who sell or exchange sex.

22. Recognising the value of community-led solutions, the Scottish Government provided over £80,000 of funding in 2021-2022 to trusted organisations within communities to support communications encouraging vaccine uptake within minority ethnic groups. This work included:

- £50,000 funding to Black and Ethnic Minority Infrastructure in Scotland (BEMIS), an umbrella organisation for minority ethnic community groups, to empower local communities to host webinars, Q+As with trusted minority ethnic health professionals both in English and in their native languages
- £15,000 funding to Sikh Sanjog, to carry out research, with the support of Sikh medical professionals, on uptake for the Sikh community, marketing campaigns, and utilising local community activists to increase uptake
- £15,000 funding to the Council for Ethnic Minority Voluntary Organisations (CEMVO), to add additional information about the vaccine and to dispel myths via the 'Stay Safe Scotland' app which provided health information in various languages and to encourage uptake.

23. Understanding the need for community partners to guide and inform the approach, National Clinical Director Jason Leitch attended Q+As facilitated by 'Feniks' and 'Jambo!' Radio, to reach the Polish and Eastern European community, and African and Caribbean communities respectively.

Scotland's Commitment to Inclusive Communications

24. Information relating to the Scottish Government's obligations under the public sector equalities duty can be found in the Module 2A DG Communities corporate statement provided to the Inquiry on 23 June 2023.

25. The Scottish Government has set out its commitment to inclusive communication in Scotland being accessible to and inclusive of all in the publication *A Fairer Scotland for Disabled People*, provided: [LF3/0016-INQ000249240]. Additional references to the need to communicate in an inclusive way have also been included in the following legislation: Social Security (Scotland) Act 2018, Consumer (Scotland) Act 2020, Coronavirus (Scotland) Act and the Coronavirus (Scotland) (No 2) Act 2020.

26. The *Programme for Government 2020-21*, provided: [LF3/0017-INQ000249241] included a commitment to step up work across the Scottish Government and support the wider public

sector to promote accessible and inclusive communications for all, ensuring the people of Scotland can access information and express their views and needs on an equal basis.

27. With regards to effectiveness, there is evidence of improvement, but longer-term assessment is needed. The *Scottish Government's Equality Outcomes for the period 2021-25*, provided: [LF3/0018-INQ000249242] will include an outcome focused on inclusive communications.

28. The Scottish Government has aimed to increase awareness and understanding of the Interpreting, Translation and Transcription Services Framework via targeted communications to public sector bodies, local authorities and the third sector. This involved providing an overview of the services provided under the Framework, provided: [LF3/0019-INQ000249243]. The Framework has been in place since November 2021 and runs until November 2025, and covers face-to-face, remote video, telephone interpreting, translation services, transcription services and text to speech (audio).

Behavioural Science

29. The initial communications strategy was shaped by a recognition that the general public in Scotland was highly motivated to act in the name of the collective best interests and it aimed to provide ongoing support with wellbeing to build resilience and support positive mental health. The work was also rooted in behavioural science, communications best practice and extensive research, drawing on emerging evidence in Scotland and overseas.

30. Scottish Government Communications continued to monitor emerging best practice in relation to communications approaches worldwide, including new evidence from health and communications experts such as that published on the Covid-19 Vaccine Communications Resource at the Institute for Public Relations, United States of America, and the latest behavioural science reports on Covid-19 from respected bodies such as the Behavioural Science Centre at the University of Warwick, England, the Behavioural Insights Team, London and publications by the Independent Scientific Pandemic Insights Group on Behaviours (SPI-B).

31. The four nations weekly call, attended by behavioural scientists were convened, chaired and led by representatives of Public Health England (PHE). The meetings were informal and consequently no minutes were taken or retained by Scottish Government officials.

Restrictions on the Publication of Data

32. Key strategic decision making regarding public communications was part of the Scottish Government's evolving communications strategy.
33. The publication of medical data and studies conducted by external individuals or bodies that provided advice to key decision makers was not controlled by the Scottish Government. Responsibility and ownership for the publication of medical data and studies conducted by external individuals or bodies was held solely by them. Once the material was in the public domain, the Scottish Government could use findings for its own publications.
34. No decisions on public health communications were taken disregarding the expert medical or scientific advice available.

Lessons Learned and Evaluations

35. While the general approach taken was successful and would form the basis for future crisis communications of a similar nature, lessons were learned from the pandemic.
36. It is well documented that when people experience stress or are under pressure, their capacity to absorb and act upon information is limited. There was therefore a need to ensure all Scottish Government Communications activity was clear, succinct and easy to understand. For example, using visuals to help people navigate the changing restrictions by colour-coding the Route Map, then Protection Levels.

Misinformation and Disinformation

37. While the digital environment offered opportunities to engage with a wide range of audiences, it also raised the issues of misinformation and disinformation. In the United Kingdom, Ofcom closely monitored attitudes towards many misinformed theories across a range of audience groups, with beliefs dissipating relatively quickly for some and other particularly problematic theories gaining traction and remaining in belief even today.
38. Guidance and emerging best practice in relation to responding to the challenges that the volume of credible and uncredible information presents, was and continues to be monitored. This is particularly the case for Covid-19 vaccination and has been informed by a range of sources including United Nations Children's Fund (UNICEF) *Vaccine Misinformation Management Field*

Guide 2020 [LF3/0020-INQ000249244] and academic research using World Health Organization (WHO) data comparing 33 countries, which showed Scotland ranked second for the highest percentage of expected deaths averted by vaccination [LF3/0021-INQ000249245].

39. The awareness of myths, misperceptions and rumours served as a barrier to action, for example, with vaccine uptake. Media plans and communications messages were shaped accordingly. Where misinformation or disinformation was known to be prevalent in certain groups, marketing activity was increased with these audiences and partner organisations were used as trusted messengers to help overcome the issues.
40. Official Scottish Government digital channels were used as a source of factual information and guidance. While there was some anti-vaccine sentiment in the comments section of social media channels, notably on the Scottish Government Facebook channel, this was not unique to Scotland. Health systems across the world faced misinformation particularly in relation to the Covid-19 vaccines.
41. The First Minister's media briefings, streamed live and recorded as clips on Scottish Government digital channels, were a valuable tool in countering misinformation, providing an authoritative, credible trusted source of facts. There is an important role for credible messengers to play in circumstances in which misinformation or disinformation is influencing public behaviour.

Visible Leadership

42. During times of crisis, governments have an obligation to lead and provide crucial factual information and engender trust in what can be a highly anxious population, to keep them safe. This can be done by providing information in a timely, clear and consistent manner and being 'visible', open and honest about the challenges being faced, and being the evidence base for the tough decisions which may alter daily life.
43. By fronting the media briefings, in conjunction with clinicians, the First Minister set out to the public and media, the rationale for the Scottish Government's decisions and the reasons for the sometimes-rapid changes in policy. During the early phases of the pandemic, no print newspapers were being produced, so television news and televised addresses were a crucial means of communicating directly with an extremely concerned public.

44. Such involvement of the First Minister and other Ministers in the media briefings was also crucial in explaining the importance of the vaccine campaign, not just in terms of its clinical benefits, but how it could help wider society in supporting a return to the freedoms of a pre-pandemic Scotland.
45. It was important that the explanation of political decision-making was backed by clinical insight and to ensure that clinical voices could speak directly to the public and explain how to take steps to remain healthy. There will always be a cohort of people inherently mistrustful of any politician, so while government has an obligation to provide factual information, there are times that the message is best delivered through a clinical voice.

The Difference in Approach Between Scottish Government and UK Government Terminology and Messaging

46. While Government advice was consistent across the four nations at the outset of the pandemic, advice over the subsequent months often varied for several reasons, including different epidemiological conditions and different approaches to non-pharmaceutical interventions (NPIs).
47. When policy interventions were available to all four nations, such as the 'furlough scheme' and 'Eat Out to Help Out', shared messaging was possible. However, other policy interventions such as restrictions and the vaccination programme were delivered differently in Scotland from other devolved nations. In these instances, Scotland-specific public health messaging was necessary to ensure that the general public had the relevant and most up-to-date information.
48. Materials developed by UK Government that were appropriate for all nations such as 'Hands, Face, Space' still directed people to web pages on the UK Government website or NHS website, not websites relevant to audiences in Scotland. Scottish Government Communications had regular engagement with UK Government counterparts as to how the UK Government website could better link with Scottish content. Whilst pages created by the UK Government did sometimes carry links to content for Wales, Northern Ireland and Scotland, these links were not given greater prominence than other content on the page.
49. Overall, while it was appropriate that rules and guidance changed in Scotland based on decisions within the country, the difference in rules north and south of the border had the potential to cause confusion, particularly for those living in border areas, with people coming to and from Scotland to do their shopping or travelling across the border via trains. Further information regarding the differing restrictions on train journeys between Scotland and England

is provided in the Module 2A DG Net Zero (Transport Scotland) corporate statement provided to the Inquiry on 23 June 2023.

50. In a similar situation in future, such divergence could occur again and agreement around the handling of this should be sought at as early a stage as possible.

Scottish Government Communications Research and Other Feedback Mechanisms

51. The ongoing desk research, horizon scanning research, regular opinion polling and qualitative research carried out throughout the pandemic was crucial for ensuring messaging and communications were as effective as possible with key audience groups.
52. Scottish Government Communications was constantly monitoring the performance of campaigns through a number of sources and used relevant learnings in future Covid campaigns.
53. In any future crisis situations, where isolation followed by social distancing is not a prerequisite, face-to-face interviewing should be deployed where reasonably practicable and safe to do so, in preference to online interviewing when undertaking qualitative research to gather insight and test messaging for effectiveness. Face-to-face interviews or focus groups enable moderators to analyse the content of what is said, tone of delivery and body language of respondents.

Breaches of Rules and Standards

54. It is essential that all individuals involved in decision-making and justification of approaches ensure that they themselves adhere to all rules, guidance and restrictions, at all times. The Scottish Government and Scottish Government Communications were aware of the potential for damage to trust in implemented restrictions and to Government as a whole, should this not be the case.
55. An example of this is when the former Chief Medical Officer (CMO), Dr Catherine Calderwood failed to properly follow guidelines on not travelling away from home during the first few weeks of the pandemic. Dr Calderwood had featured in Scottish Government marketing that urged compliance with the current guidance. Dr Calderwood resigned from her position as CMO, recognising that the incident had increased the risk of her behaviour becoming a distraction from the hugely important job that government and the medical profession had to do in getting the country through this coronavirus pandemic. The marketing material was discontinued and replaced by a campaign featuring the current National Clinical Director Jason Leitch.

Monitoring the Effectiveness of Public Health Communications

56. The Scottish Government Communications online qualitative research panel was run by an independent research agency. It comprised a cross-section of the general public, including audiences who were at a higher risk of infection, from minority ethnic communities, living alone, at a higher risk of social isolation, lower income individuals and people with mental health problems. Panel members were recruited for specific projects, providing insight to inform the communication strategy. The panel evaluated messages and creative routes for campaigns often delivered in response to very swift, fast-moving policy decisions, to help optimise communications effectiveness before they were launched.
57. In addition, specific evaluation research was carried out on marketing campaigns. This was run on behalf of Scottish Government Communications by another independent research agency. This measured campaign recognition, message takeaways and action taken in response, assessing whether objectives were met and helping to shape communications activity based on these learnings throughout the pandemic.
58. The evaluation research ran at appropriate intervals, and each wave consisted of a sample of approximately 500 adults aged 16 and above across Scotland, with fieldwork carried out via an online survey. Two or three campaigns were often evaluated in one wave to maximise cost efficiency.
59. The evaluation approach relating to the Scottish Government website involved Scottish Government Communications working closely with policy teams and others to transform complex guidance into user-focused information, based on user insights and feedback. The website user research with key sector stakeholders identified potential improvements to sectoral guidance and informed ongoing work on the quality and findability of this information.

Records Management

Microsoft Teams Retention Policy

60. The SCOTS Connect product suite supplied by the Scottish Government's Information and Technology Services (iTECS) division, provides secure, robust, scalable and fit for purpose Information Communications Technology (ICT) solutions for the Scottish public sector, including Microsoft 365, of which Microsoft Teams ('Teams') is a service. The SCOTS Connect version of Teams does not form part of the Scottish Government corporate record as it is not automatically

saved into the electronic Record and Document Management system (eRDM). Teams is a tool primarily used for collaboration, chat and meetings, and a user can delete messages at any time. If not deleted by the user, the Microsoft Teams system will begin an automatic deletion after five days for Teams Chat messages and three years for Teams Channel messages, known as 'conversations' in Microsoft terms. The retention and deletion policy for Teams, as described above, is set by the Scottish Government. With these policies in place on Teams, it is therefore up to the user to save any content that is required to be held for the corporate record from Teams into eRDM, as set out below there is guidance for SCOTS users regarding this, and this approach is consistent with how information is managed in Scottish Government. Policies were not amended during the pandemic.

61. The SCOTS Connect version of Teams started rolling out to users, with guidance [LF3/0022-INQ000249246] [LF3/0023-INQ000249247] [LF3/0024-INQ000249248], in September 2020. Therefore, since this point, messages may have been deleted by users or by automatic policies as described above. As part of the Scottish Government guidance on the use of Teams, anything that is part of the corporate record must be recorded in eRDM as soon as possible, as part of our standard record keeping and record management policies. There is an expectation of Scottish Government employees to remain mindful of deletion policies and to act in line with the corporate records management policy and plan. This includes the extraction and transfer of Teams conversations with business value or with evidence of decision making into eRDM. Where these policies are followed there would be no loss of data and information. Compliance with Scottish Government Records management policy, which Teams aligns with, is the responsibility of individual business areas and their Information Asset Owners.

62. Prior to the rollout of the SCOTS Connect version of Teams, Skype for Business was used as the Scottish Government messaging platform. This platform did not retain copies of messages sent and messages were automatically deleted the same day.

63. Users, primarily in DG Health and Social Care, also had access to other versions of Teams hosted by the NHS from around May 2020 to help co-ordinate the pandemic response. Any messages on this system will be governed by NHS 365 tenant policies and are not accessible to Scottish Government administrators.

Decision Making via Mobile Messaging

64. Further information relating to the use of mobile messaging is outlined in the draft Module 2A Corporate statement relating to private messaging provided to the Inquiry 24 July 2023.

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.

Signed:

Personal Data

Dated: 6 November 2023