

Friday, 3 May 2024

(10.00 am)

Statement by LEAD COUNSEL TO THE INQUIRY for MODULE 2C

MS DOBBIN: My Lady, I was going to address you, if I may, and before the witness is sworn.

My Lady, a disclosure issue has arisen, I wonder if I can address you on that. You may recollect that when I opened the Inquiry -- well, when I opened Module 2C on behalf of the Inquiry, I referred to the fact that in respect of a meeting which took place on 2 July of the Executive Committee, that the handwritten notes of that meeting were missing; in other words that they hadn't been provided to the Inquiry.

I noted on behalf of the Inquiry that that was significant, because it was the first Executive Committee meeting which had taken place after the funeral of Mr Storey, at which the deputy First Minister and other ministers had attended.

Very shortly after the opening was provided to the Inquiry, the Inquiry was approached by the Executive Office to say that in fact they had the minutes of the 2 July meeting, and I wonder if I may bring up on screen the letter that was sent to the Inquiry on behalf of the Executive Office by the Departmental Solicitor's Office.

We have this letter at INQ000474209. If I could ask

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by 17 March 2023. On 11 April 2023 a Solicitor to the Inquiry wrote again to the TEO legal representative, and set out again a list of documents and categories of documents which remained outstanding from TEO's disclosure to Module 2C thus far, and again the notes of 2 July were included within the material that was missing.

On 1 June 2023, there was a meeting between the Executive Office and Module 2C, and the first item on the agenda that was discussed was the outstanding disclosure, and again the fact that there were a number of documents from the schedule which had been provided in April and were missing, and reference was made to the fact that that had been circulated a number of times, and there was a query as to why outstanding documents were still missing.

On 2 June 2023, so immediately after that, Solicitor to the Inquiry again emailed about the outstanding documents that had been set out in the schedule which was in the email of 11 April.

On 7 June 2023, the TEO contacted the Inquiry to say that it was aiming to complete disclosure.

On 16 June, again 2023, a Solicitor to the Inquiry contacted the TEO again setting out that there were still outstanding documents and again specifically

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if the second paragraph of that letter could be highlighted. So, my Lady, you will see that in that letter it was suggested that it had come as a surprise to members of the Executive Office Covid Inquiry team, including Ms Jane Holmes and Ms Maria Hannon, as they believed that the notes had been provided to the Inquiry. As you can see, they set out that:

"Steps were taken to search for the notes and the email dated 3 August 2023 that had scanned the handwritten notes attached. This was located within Content Manager by [Ms Hannon] who carried out the search."

Can I put the suggestion that that came as a surprise in some context for you and set out a chronology of all the requests that were made of the Executive Office for the notes of 2 July 2020.

So on 8 February 2023 a solicitor to the Inquiry emailed the legal representative of the TEO setting out a list of materials that were missing. Amongst the materials that were missing and which were set out by the solicitor were the notes of 2 July 2020.

On 9 March 2023, a Solicitor to the Inquiry once again emailed the legal representative of the TEO saying that she had not received a response to the request and asking if the materials could be provided urgently and

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referred to the fact that the Inquiry was missing handwritten notes and a number of briefing papers that had been set out in the schedule of 11 April.

On 20 June 2023, the TEO contacted a Solicitor to the Inquiry to set out that a number of outstanding items had been uploaded to Egress, and attached to the email was a table providing an update against the items that had been requested.

In respect of the notes of 2 July 2020, it was specifically said "Notes not held, confirmed by Executive Secretary".

Notwithstanding that that indication had been given that the notes were not held, on 6 July 2023 again a Solicitor to the Inquiry contacted TEO setting out that they were grateful for the ongoing disclosure of documents, but again said "We have a few specific handwritten notes of minutes which appear to be outstanding, and we would be grateful if you could please provide those to the Inquiry, or if it's the case that no handwritten notes exist for these meetings, your confirmation of the same", and again it set out the dates of the handwritten minutes that were missing, and again this included a request for the 2 July 2020 handwritten notes.

On 31 July 2023, there was a letter again from

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1 Module 2C to the Executive Office, and again this set
2 out in respect of the email that had been sent by the
3 TEO in response to the ongoing requests for disclosure
4 that a number of meeting notes were not held. So
5 the Inquiry set out its understanding that the
6 2 July 2020 notes were not held, and the Inquiry set out
7 to the TEO that:

8 "These handwritten notes cover a period of
9 significant interest to the Inquiry, and it's plainly of
10 concern if these are in fact missing. To that end,
11 please confirm that the handwritten notes are missing,
12 that there are no copies of them, and please explain
13 where these records ought to be stored. Please explain
14 the process by which such records were stored and how it
15 is possible to remove them from storage. Can you
16 explain what is known about the circumstances in which
17 they have gone missing? Has there been an investigation
18 into this?"

19 We are now aware, because it's been disclosed to us,
20 that in fact there were investigations in and around
21 this time as to the missing notes.

22 Perhaps if I could ask to be brought up on screen,
23 please, the document at INQ000421789. If I could ask,
24 please, for page 2 of that.

25 My Lady, page 2 of this email sets out, and you can
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1 paragraph, if that paragraph was intended to convey that
2 there had been any casualness in terms of our requests
3 and the efforts that were made in order to obtain the
4 notes of 2 July 2020, that would obviously be quite
5 wrong and it's important on behalf of the Inquiry that
6 I make clear to you obviously that the importance or the
7 potential importance of those notes was appreciated by
8 the Inquiry, and that I make clear to you all of the
9 efforts that were made in order to obtain those notes,
10 in order to be able to provide them to
11 core participants, obviously, before the Inquiry
12 started.

13 Thank you, my Lady.

14 **LADY HALLETT:** Thank you very much, Ms Dobbin. I think you
15 made mention of a name that had been redacted, so that
16 just needs to be deleted from the transcript, early on
17 in your remarks.

18 As far as the issue you've just raised, this is
19 an issue I expect will be explored today with witnesses,
20 and I am very concerned about what you've just told me,
21 and I will see at the end of the day and consider with
22 the Inquiry team whether I wish to pursue this matter
23 further. It's not a very happy picture.

24 **MS DOBBIN:** I'm grateful, my Lady.

25 My Lady, I think the witness can be sworn in.
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1 see it in blue, these were the requests that had been
2 made on behalf of the Inquiry. You can see at B again
3 the reference to the 2 July notes.

4 If we go over the page, please, to page 1, you'll
5 note that this email is dated 3 August 2023, and that in
6 the first paragraph it confirms that the handwritten
7 notes of 2 July 2020 had in fact been found.

8 If you look at the third paragraph, and I'd ask you
9 just to take a note of this for now, you will see that
10 reference is made to the existence of the notes being
11 attributable to the minute-taker taking them, and the
12 suggestion that where they don't exist or where they
13 haven't been found it may be that the minute-taker
14 didn't make those notes. We'll come back to that in
15 evidence.

16 But it suffices to say that, despite those notes
17 having been found and despite the sheer number of
18 requests having been made, despite the fact that the TEO
19 in fact told the Inquiry that those notes weren't held,
20 and despite the very specific questions that the Inquiry
21 asked about the precise circumstances in which notes
22 like this could go missing, they weren't provided until
23 after the opening had been given.

24 My Lady, if I could go back to the letter that the
25 TEO sent, INQ000474209, and again highlight the second
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1 **LADY HALLETT:** I'm sorry you've had to wait.

2 **MS KAREN PEARSON (affirmed)**

3 **Questions from LEAD COUNSEL TO THE INQUIRY for MODULE 2C**

4 **MS DOBBIN:** Can I ask you to give your full name to
5 the Inquiry, please.

6 **A.** Karen Jayne Pearson.

7 **Q.** Now, Ms Pearson, I think you have in fact made two
8 witness statements to the Inquiry; is that correct?

9 **A.** That is correct.

10 **Q.** You have made one in your personal capacity. Do you
11 have that in front of you?

12 **A.** Yes, thank you.

13 **Q.** And I think it's right that you signed that statement on
14 28 February 2024?

15 **A.** I did.

16 **Q.** And are you content that that statement's true to the
17 best of your knowledge and belief?

18 **A.** I am, yes.

19 **Q.** Thank you. I think that you also signed the TEO
20 statement, so you signed a statement on behalf of the
21 Executive Office; is that correct?

22 **A.** Yes.

23 **Q.** And do you also have that in front of you?

24 **A.** I do, yes.

25 **Q.** And I think that that statement was signed on
8

1 19 February 2024?

2 **A.** That's right.

3 **Q.** And again, are you content that the contents of that

4 statement are true to the best of your knowledge and

5 belief?

6 **A.** Yes, I am, yes.

7 **Q.** Now, if at any time, Ms Pearson, you need a break,

8 please do say and we'll be able to stop proceedings.

9 All right?

10 **A.** Okay.

11 **Q.** Thank you.

12 Now, the first question that I wanted to ask you

13 about was in fact about the corporate statement and what

14 was said about some of the handwritten notes. So

15 I wonder if I could ask, please, for that to be brought

16 up on screen. That's at paragraph 70, so that's

17 INQ000438174, and paragraph 71, please.

18 I think it's right, Ms Pearson, that paragraph 71 is

19 dealing with the issue of the outstanding handwritten

20 notes that hadn't been provided to the Inquiry, and that

21 specifically refers to the notes of 3 February, 6 August

22 and 13 August. Correct?

23 **A.** Correct.

24 **Q.** If we look at the sentence that begins on the second

25 line:

9

1 that paragraph, to say:

2 "All extant handwritten notes of an Executive

3 meeting taken by the usual minute taker had been

4 provided."

5 **A.** Yes.

6 **Q.** But that wasn't, in fact, correct, was it?

7 **A.** Correct, you are right, yes.

8 **Q.** When you signed this statement, were you or did you

9 understand the steps that had been taken in order to

10 investigate what had happened to the missing handwritten

11 notes?

12 **A.** I was aware that the Inquiry was looking for full

13 disclosure, that's not in doubt, but I just need to

14 share that I was off work for a period of time in 2023.

15 That's no excuse, that's no -- I just -- it's a fact.

16 I was not around for about six months. But my

17 understanding, in signing the statement, was that there

18 were three missing notes.

19 **Q.** Thank you.

20 So certainly as far as that bit of your statement

21 goes, that's obviously something that needs to be

22 corrected because at the time the Executive Office had

23 not in fact provided all of the handwritten notes that

24 it was in possession of?

25 **A.** Yes.

11

1 "The existence of manuscript notes is attributable

2 solely to the discretion of the customary minute

3 taker ..."

4 We can see, can't we, that that language comes from

5 the email that was sent by the Executive Office or

6 within the Executive Office about the outstanding notes;

7 correct?

8 **A.** Yes, that's my understanding, yes.

9 **Q.** And in fact perhaps if it's possible to bring both of

10 those documents on screen together, the email is at

11 INQ000421789.

12 Thank you.

13 So if we look at paragraph 71 of the statement, and

14 if we could highlight "The existence of manuscript notes

15 is attributable", and if we could highlight the email,

16 please.

17 We can see the equivalent.

18 So in other words, paragraph 71 of the statement is

19 expressly addressed and based on the email that was

20 sent; correct?

21 **A.** Yes.

22 **Q.** But obviously the statement doesn't refer to the fact

23 that the minutes of 2 July had been found?

24 **A.** No, it doesn't, you're right.

25 **Q.** And in fact it goes on, if we look at the very end of

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1 **Q.** Thank you, I'm going to move on now, if I may, to deal

2 with your evidence.

3 I want to start, please, by asking you a bit about

4 your role and your background, if I may, in the

5 Executive Office. I think in fact it's right that you

6 started your Civil Service career in the Home Office; is

7 that correct?

8 **A.** Yes.

9 **Q.** In Westminster?

10 **A.** That's right.

11 **Q.** I know it's referred to as the Home Civil Service; is

12 that right?

13 **A.** Yes.

14 **Q.** And you began your career there in 1986; is that

15 correct?

16 **A.** Yes.

17 **Q.** Then in 1998 you came on a secondment to the

18 Northern Ireland Office; is that also right?

19 **A.** Yes.

20 **Q.** And then thereafter did you stay and effectively become

21 a member of the Northern Ireland Civil Service?

22 **A.** Yes, I did. I started in the Northern Ireland Office,

23 and as part of that posting I was in a devolving job

24 when the Department of Justice was created and

25 I transferred to the Northern Ireland Civil Service in

12

1 2012.

2 **Q.** I think you had a number of different roles, but

3 eventually in May 2019, you were one of the civil

4 servants who became part of the work dealing with

5 EU exit; is that correct?

6 **A.** I was working on EU exit in the Department of Justice

7 prior to that date. In May 2019 I transferred to the

8 Executive Office to work on EU exit.

9 **Q.** I see. And there you remained, and we'll come to this

10 in due course, until you were asked to become part of

11 the civil contingency framework within the Executive

12 Office responding to the pandemic; is that right?

13 **A.** Yes. I would just say I was asked to move across to

14 Covid work, but that was in more of a policy role rather

15 than the operational civil contingencies role at that

16 time.

17 **Q.** All right. Well, I'm going to ask you a bit more about

18 that, and a bit more about how you came to be in that

19 role and the work that you did.

20 Before I move on to that, though, I do want to ask

21 about the role that you had on the departmental board.

22 **A.** Yes.

23 **Q.** You deal with that at paragraph 6 of your witness

24 statement. Can I ask you to explain what the

25 departmental board was, please.

13

1 having a role in determining the risk appetite of the

2 Executive Office; correct?

3 **A.** Correct, yes.

4 **Q.** What you've said in your statement is that one of the

5 matters which that board considered was the paper that

6 had been written by Mr Stewart on 25 February about

7 capacity in civil contingencies in government in

8 Northern Ireland?

9 **A.** Yes.

10 **Q.** I wonder if we could just bring that up please. That's

11 at INQ000205712.

12 The Inquiry has already looked at this document, I'm

13 sure you're familiar with it as well, and I know you

14 looked at it to prepare your statement.

15 I wonder if we could just go to paragraph 23 of

16 that, please.

17 I'm sorry, Ms Pearson, I understand the screen is

18 frozen?

19 **A.** It's fine.

20 **Q.** I'll just let you orientate yourself. We know that what

21 was being proposed was a strategic review of civil

22 contingency capability.

23 We can see at paragraph 22 onwards Mr Stewart is

24 talking about risk, isn't he?

25 **A.** He is, yes.

15

1 **A.** Yes. So all departments will have a departmental board

2 charged with looking after governance matters primarily.

3 It's not necessarily a policymaking board, although it

4 will be aware of policy work in its own department.

5 So the TEO departmental board would have looked at

6 matters such as finance, governance, staffing, risk,

7 business planning, that sort of work, rather than

8 specific policy objectives.

9 **Q.** Just to be clear, this is the departmental board for the

10 Executive Office itself; is that correct? So it's not

11 a cross-departmental board, it's specific to the

12 Executive Office?

13 **A.** I think Jenny Pyper referred yesterday to the NICS

14 board.

15 **Q.** Yes.

16 **A.** That's where you get the overarching view of governance.

17 My statement is it's referring specifically to the TEO

18 departmental board.

19 **Q.** And that had a number of senior civil servants on it and

20 non-executive members as well; correct?

21 **A.** Correct.

22 **Q.** Part of its role, I think, was also to assess risk on

23 the part of the Executive Office as well; is that right?

24 **A.** Yes, it is.

25 **Q.** And I think you referred to that in your statement as

14

1 **Q.** Just give me one second.

2 **(Pause)**

3 So 22 is dealing with risk and at 23, as part of

4 that assessment:

5 "... if no action is taken to address the lessons

6 learnt and to implement recommendations from the C3

7 Project experience the risk arises that civil

8 contingency arrangements in Northern Ireland will fall

9 even further behind the rest of the UK, and the

10 Executive and wider society may not be prepared for, or

11 have the capacity and capability to deal effectively

12 with, an emergency situation should a major contingency

13 present."

14 Obviously, Ms Pearson, at this point in time,

15 Covid-19 was, as it were, hurtling towards

16 Northern Ireland. What was the assessment of the

17 departmental board, or what was its response to this

18 paper and the risk that was being set out?

19 **A.** I think we accepted the recommendation that the review

20 should launch. We were also aware of the enormous work

21 that had gone on in Yellowhammer, we would have been

22 aware of that at departmental board. I would have been

23 aware of it in my job in TEO at that time as well, and

24 previously having worked on preparations in the

25 Department of Justice. So I think we would have

16

1 accepted that assessment.

2 **Q.** But --

3 **LADY HALLETT:** Sorry, Yellowhammer, you mean the
4 preparations for a no-deal Brexit?

5 **A.** Yes, my Lady, yes.

6 **MS DOBBIN:** But, I mean, what might be thought odd about
7 this paper or what might be thought to be an air of
8 unreality about it is that it's talking about
9 a hypothetical risk in the future as opposed to a fear
10 that there was a lack of capacity in order to be able to
11 respond to a major emergency which was right in front of
12 Northern Ireland, which was coming.

13 **A.** I accept that, looking at it now. At the time, we would
14 have been aware of how much preparation had been done.
15 Chris Stewart here is recommending a review, but that
16 would have been building on the preparations that had
17 been made for no-deal exit.

18 **Q.** So when you say you would have been aware of all of the
19 preparations going on, are you specifically referring,
20 Ms Pearson, just to Operation Yellowhammer and those
21 preparations --

22 **A.** Yes.

23 **Q.** -- as opposed to anything Covid specific?

24 **A.** I -- today I'm referring to Operation Yellowhammer.

25 **Q.** But, I mean, wasn't the board incredibly concerned, in

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1 **Q.** But this entire paper was proposing a review of all of
2 the civil contingencies --

3 **A.** Yes, yes.

4 **Q.** -- and their capacity. He wasn't, this isn't a paper
5 about a fear of not having enough staff.

6 **A.** Yes, I accept that.

7 **Q.** Because the reality of the position was that over 800
8 people had in fact been trained as part of
9 Operation Yellowhammer in order to be part of the civil
10 contingencies operation; correct?

11 **A.** Correct.

12 **Q.** So notwithstanding that, and that that had been done,
13 he's nonetheless pointing to the overarching concern
14 that nonetheless Northern Ireland capability in
15 contingency was so far behind the rest of the UK that
16 that was the real concern?

17 **A.** Yes, I think that's correct. He had a very small team
18 at that point.

19 **Q.** Yes.

20 **A.** And I've acknowledged that in my statement as well. It
21 makes sense to me that Yellowhammer was going to be what
22 we would rely on for Covid, and it makes sense to me
23 also that we should review the size of his team and to
24 see if we could improve that for the future.

25 **Q.** So what was the board's response, then, to this paper?

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1 the face of an oncoming pandemic, that this was the
2 state of affairs, and that it was being suggested that
3 there wasn't the capability to deal or there may not be
4 the capability to be able to deal with an emergency --
5 or the major contingency that wasn't theoretical but
6 which was real?

7 **A.** I suppose there's two aspects to that. Because of my
8 own role in Yellowhammer, I would have been aware of the
9 state of readiness that that would have assisted with in
10 a pandemic. You can't lift Yellowhammer and make it
11 work directly. I think we've heard about some of the
12 initial problems. But I would have been personally
13 aware that the Yellowhammer situation would have relied
14 on bringing volunteer staff in from other departments,
15 that was the core of the Yellowhammer preparation.

16 **Q.** Yes, but that's not answering the concern that's being
17 set out here, is it? That's not answering what's
18 obviously a very significant concern, that
19 Northern Ireland doesn't have the capacity to cope with
20 a major contingency.

21 **A.** I think Chris here was referring to the number of staff
22 he had immediately available to him, not the totality of
23 what the service would have been able to deliver in
24 Covid, and that's exactly what happened. I think Chris
25 here is trying to stabilise his staffing for the future.

18

1 **A.** I -- I don't recall a specific conversation around it,
2 I'm absolutely clear that I was at that board and that
3 we agreed this paper, but I think -- I am distinguishing
4 between utility of Yellowhammer in Covid, which is
5 exactly what happened, and the need to stabilise the
6 size of the team, because it was just too small.

7 **Q.** Yes, I want to try and keep everything separate,
8 though --

9 **A.** Okay.

10 **Q.** -- because we will come on to that. I really just want
11 to focus at the minute on what might be regarded as
12 a flare going up to the departmental board about a risk
13 in relation to a theoretical emergency whenever there
14 was in fact a real emergency in front of it.

15 **A.** Yes, I understand.

16 **Q.** I mean, was there any urgency on the sense of the
17 departmental board or any sort of ...

18 **A.** I can only say again that because we'd been through
19 Yellowhammer, it was recent and it was going to be
20 applicable, and I think Chris said yesterday and I agree
21 that designing arrangements for an emergency should be,
22 he referred to it as blind, I refer to it as agnostic,
23 to the nature of the emergency, it's your ongoing
24 capability that's important, and then of course you do
25 have to tailor that to what you're dealing with at the

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1 time. So I suppose maybe I was so close to Yellowhammer
 2 that I was not relaxed about it, not in any way, but
 3 I knew what capability we had and how that could be
 4 applied if the pandemic took hold, as it did.

5 **Q.** But you would have, I mean, obviously appreciated that
 6 planning for a pandemic is not, would not be the same as
 7 planning for EU exit?

8 **A.** They're fundamentally different, but there's a lot of
 9 applicability in the capability, would be my position.

10 **Q.** So was the board not interested or enquiring about what
 11 sort of planning was actually going on, in other words
 12 how is the risk that's being presented here, how is that
 13 being met in respect of the Covid pandemic?

14 **A.** I wouldn't accept that the board wouldn't be interested
 15 in that. I can only say that we were aware of
 16 Yellowhammer and that had given us a good position on
 17 capability.

18 **Q.** I may come back to this, but just focusing on
 19 Yellowhammer for a moment, and your expertise in that.
 20 Obviously we know that 800 people were trained and we
 21 know that at the start of March, or in the first couple
 22 of weeks of March, certainly, Mr Stewart was scrabbling
 23 to find anyone from those 800 volunteers who would
 24 become part of the hub.

25 **A.** Yes.

21

1 arrival because they've been inducted and trained has
 2 some advantages to it.

3 **Q.** Right. I will --

4 **LADY HALLETT:** Are you moving on?

5 **MS DOBBIN:** I was going to.

6 **LADY HALLETT:** Just going back to Mr Stewart's paper, when
 7 Ms Dobbin asked you questions about what you remember of
 8 what the board did, you said "We accepted the
 9 recommendation, the review of civil contingencies should
 10 launch", you thought the review was going to start
 11 immediately, did you?

12 **A.** Yes, I did, yes.

13 **LADY HALLETT:** So it wasn't going to be in Mr Stewart's own
 14 time, that wasn't your understanding?

15 **A.** I ... when I look back at it now, the wording on the
 16 paper would lead me to suggest that if you're asking for
 17 a review it's because you think something needs to be
 18 reviewed.

19 **LADY HALLETT:** Well, it was urgent, wasn't it, if you were
 20 that far behind the rest of the UK?

21 **A.** Yes, my Lady.

22 **MS DOBBIN:** So I want to come, then, Ms Pearson to how you
 23 end up becoming involved in the response, having been
 24 part of the EU exit team. Perhaps if we do this by the
 25 documents and we go to INQ000218494. I think if we

23

1 **Q.** We've seen references to one or two people volunteering.
 2 Can you assist as to why no one would volunteer?

3 **A.** I think Mr Harbinson, in his statement, on his
 4 experience as chief of staff, covers this. I don't want
 5 to jump on to me joining the team, but it's something
 6 Anthony and I talked about at the time when I did go
 7 across, and I think there's a couple of things. There
 8 were some HR issues about terms and conditions,
 9 recompense for the sort of work. I also think that
 10 I accept in my statement that we didn't have something
 11 that went straight from "here's the requirement" to
 12 "here's the provision of staff" and I think that's a bit
 13 of a gap.

14 **Q.** And do these kind of arrangements have to be dependent
 15 on volunteers rather than having people who can be
 16 commanded to be part of a civil contingency response?

17 **A.** I think the answer to that is that that's what we had in
 18 Yellowhammer, was a volunteer basis. Chris referred
 19 yesterday to it being quite specific work, it's not for
 20 everyone. Having a pool that we can draw on is
 21 important, and I can tell you what we're doing about
 22 that in future. But commanding people to go to that
 23 sort of work I think would be less good than volunteers,
 24 I think having people that want to be here, understand
 25 the nature of the work and can assist immediately on

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1 start, please, on page 2, so we can see this is at
 2 4 March, and this is an email from a Ms Rooney, who
 3 we've heard a bit about, who was involved in civil
 4 contingencies. She refers to having chaired a C3 lead.
 5 Can you help as to what that means?

6 **A.** Yes, so the Inquiry will hear two different references
 7 to C3, C3 was a short version of the Yellowhammer work.
 8 In this context, what Bernie means here is each
 9 department and some of our operational leads will have
 10 a civil contingencies lead and we bring them together in
 11 a group called C3, which is command, control,
 12 co-ordinate. So I think it's shorthand for that group.

13 **Q.** If we just look at what she's saying, so I think she --
 14 there has been a C3 lead meeting and strong views were
 15 expressed, and the people who attended wanted it to be
 16 conveyed back to the head of Civil Service, and they set
 17 out a number of issues, and we can see:

18 "Lack of structures and staff to respond to the
 19 Cabinet Office ..."

20 And the Inquiry's already seen some of the requests
 21 that were being made by Cabinet Office.

22 A "call for DOC", I think is that a departmental
 23 operation ...?

24 **A.** Centre.

25 **Q.** Centre. So that again was part of a civil contingencies

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1 stand-up, wasn't it? It was having a centre within each
 2 department that would feed information through,
 3 essentially, to a hub; correct?
 4 **A.** That's correct, and you'll also hear the term "EOC",
 5 emergency operations centre, it's the same concept.
 6 **Q.** So the C3 leads wanted those to be set up, so I think we
 7 can assume from this that they hadn't been set up within
 8 departments at this point in time?
 9 **A.** Yes.
 10 **Q.** And a call for the NI hub to be established as a matter
 11 of priority?
 12 **A.** Yes.
 13 **Q.** And I think -- can we assume that the C3 leads then, are
 14 they permanent secretaries or are they senior grade
 15 civil servants?
 16 **A.** It differs from department to department. For some
 17 departments it will be a specific role. For other
 18 departments it will be part of a person's job. But it
 19 wouldn't be that senior, no, no.
 20 **Q.** All right. And were you part of this structure or were
 21 you at this meeting?
 22 **A.** I was not part of the C3 structure, and I was not at
 23 that meeting.
 24 **Q.** Okay. If we go to page 1, please.
 25 I think this is a response from Mr Stewart, who, at
 25

1 reference to the year was not just, then, about Covid,
 2 it was about the transition from the EU, which would
 3 come towards the end of that year. So what I'm
 4 suggesting here is a conversation about how we work
 5 together.
 6 **Q.** All right. And this reads as though you understand that
 7 some assistance might be needed?
 8 **A.** Yes.
 9 **Q.** And that Mr Stewart, for example, might need some help
 10 in being able to carry through with these arrangements;
 11 is that correct?
 12 **A.** Yes, correct.
 13 **Q.** Were you aware of a sense at this time amongst the
 14 C3 leads in these departments that they felt that the
 15 civil contingencies arrangements should be on foot, and
 16 wanting the head of Civil Service to know that's what
 17 they thought?
 18 **A.** I became aware of that thinking in the C3 community
 19 through this email chain, and that's why I responded to
 20 this particular email chain.
 21 **Q.** So what happened to that, then? What happened to the
 22 calls from the people who would -- who were going to be,
 23 as it were, actively involved in this, wanting the
 24 arrangements to be put on -- enacted?
 25 **A.** The hub was not immediately stood up in response to
 27

1 the third paragraph, says that he thinks that's
 2 a "disappointing" response from colleagues, but "not
 3 a surprise".
 4 I think if we -- we can just see at the bottom of
 5 the first page:
 6 "Departments are free to establish [those centres]
 7 if they wish. To be candid, with the exception of [the
 8 Department of Health], I wonder what they would be doing
 9 at present, when the focus is on planning."
 10 If we go to the top of the email chain, you do then
 11 become involved --
 12 **A.** Yes.
 13 **Q.** -- in this, to say, and we can see what you say:
 14 "... keen to discuss how our preparedness work and
 15 C3 might intersect this year, and what we can offer from
 16 our preparedness work to assist in your risk analysis."
 17 **A.** Yeah.
 18 **Q.** Your reference to "this year" doesn't sound as though
 19 that's -- doesn't carry any urgency with it, that
 20 there's any sense of assistance being needed in respect
 21 of what was happening and the calls that were being made
 22 by these C3 leads to have these parts of the civil
 23 contingencies structure stood up?
 24 **A.** I agree that I could have been more specific there.
 25 What I meant was, at any point this year, and the
 26

1 this, but it was stood up in -- a few days later.
 2 **Q.** We know obviously that the civil contingencies
 3 arrangements weren't in fact stood up until 18 March.
 4 Can you help us with, or can you explain what the
 5 reluctance was, from your perspective, at the start of
 6 March 2020, to standing these arrangements up?
 7 **A.** At this point I'm not part of the Covid team. I think
 8 other people have spoken to their thinking on the
 9 standing up of the hub, and I would agree that standing
 10 up the hub too early can be detrimental to overall
 11 effort. The precise date on which the hub could have
 12 been stood up, other people have spoken to, but at this
 13 point I can see that I'm starting to imagine that we
 14 might need to offer some assistance at the point it is
 15 stood up. I'm not here suggesting that it should be,
 16 I'm getting myself ready for the possibility that we
 17 will be asked.
 18 **Q.** The work that you did on EU exit and, forgive me if I'm
 19 wrong about this, but it had given you expertise in
 20 planning, that's what you were -- is that correct?
 21 **A.** Yes.
 22 **Q.** That's effectively what you understood?
 23 **A.** Yes.
 24 **Q.** And we will see eventually what you were brought in to
 25 help with. I mean, did you have any concerns at this
 28

1 stage that, for example, the Civil Contingencies Group
 2 ought to be meeting in order to ensure that the plans
 3 were in fact on foot and were going to be effective to
 4 deal with the pandemic?
 5 **A.** At that -- on 4 March, no, I didn't, but I'm absolutely
 6 clear that I was starting to think my way into it at
 7 that point, because my sense was we would be asked to
 8 help.
 9 **Q.** Right, well, let's -- maybe if we move on, then, to when
 10 you were asked to help, and that might help us
 11 understand what had happened before. But -- and it may
 12 be I can just help you with the dates.
 13 I think you were contacted on a Saturday, on
 14 14 March?
 15 **A.** That's my recollection, yes.
 16 **Q.** And that was by Dr McCormick, who was the -- I think he
 17 was the permanent secretary who was in charge, is that
 18 right, of EU exit?
 19 **A.** That's correct, he was my immediate line manager.
 20 **Q.** And I think he asked you if you would move across to the
 21 TEO to be part of the Covid response; is that right?
 22 **A.** That's correct.
 23 **Q.** And in fact you then moved across on Monday the 17th?
 24 **A.** Tuesday the 17th maybe.
 25 **Q.** Yes, you're right, I've got my dates mixed up, I just
 29

1 in more granular detail what it was that departments
 2 were doing to respond at this point --
 3 **A.** I don't recall that, no, no.
 4 **Q.** So as far as you're concerned, then, was the plan that
 5 you drafted on 17 March, was that essentially the first
 6 strategic plan that had been drafted in Northern Ireland
 7 that was cross-departmental?
 8 **A.** Yes, but for a specific purpose. I think the document
 9 that you showed both Sir David and Chris is a civil
 10 contingency style document. What I was brought across
 11 to do was to pull together actions into a single space
 12 to enable the Executive to monitor and reach early
 13 decisions on where they wanted to put their resources
 14 and their time and their effort. So I think it had
 15 a very specific purpose wouldn't necessarily be a civil
 16 contingencies response plan. This is about drawing
 17 together a strategy for the Executive to aid
 18 decision-making.
 19 **Q.** But it must be intrinsic to that that obviously you know
 20 what every department is doing and you know where your
 21 areas of risk are?
 22 **A.** Yes.
 23 **Q.** But as far as you're concerned, at 17 March that didn't
 24 exist?
 25 **A.** Not as far as I'm aware, no.
 31

1 know from your emails that you were certainly in office
 2 on the 17th --
 3 **A.** Yes.
 4 **Q.** -- and drafting a plan.
 5 **A.** Yes.
 6 **Q.** And we'll go on to look at it, but what effectively you
 7 did was to try to set out an overarching strategic plan
 8 that would encompass a sort of holistic approach to
 9 responding to the pandemic?
 10 **A.** That's a fair summary, yes.
 11 **Q.** Can I ask you: when you arrived, then, and took up your
 12 post on 17 March, did you find a suite of plans that had
 13 already been prepared, so a suite of departmental plans,
 14 and an overarching plan that pulled all of those
 15 together or identified gaps, that kind of material?
 16 **A.** No.
 17 **Q.** We've seen a document of the -- forgive me, it's dated,
 18 I think, I will see if someone can remind me, we've seen
 19 it in the Inquiry already, it's quite a high-level plan
 20 that Mr Stewart pulled together, that was a summary of
 21 what the departmental response was going to be. I don't
 22 know if you're familiar with that document?
 23 **A.** Yes, I am, yes.
 24 **Q.** I take it from your answer you didn't find, then,
 25 detailed plans that sat beneath that summary setting out
 30
 32

1 **Q.** The plan that you drafted on 17 March, I mean obviously
 2 you rightly say in your witness statement you don't have
 3 any background in public health at all, and I don't
 4 think that you even -- that's what you say in your
 5 statement, you didn't even have access to influenza
 6 preparedness plans, or any of that sort of background at
 7 all.
 8 **A.** That's correct.
 9 **Q.** So you were very much looking at it from your
 10 perspective as someone who was trained in planning in
 11 EU exit?
 12 **A.** Experienced in planning, yes.
 13 **Q.** Yes.
 14 **A.** Yes.
 15 **Q.** Can I ask you, then, given that you didn't have that
 16 background, when you drafted that very initial plan on
 17 17 March, and I know that you went on to draft other
 18 documents, but did you have any planning assumptions or
 19 anything specific that you could base that plan on, or
 20 were you -- was it intended to be a much higher level
 21 plan than that?
 22 **A.** Definitely to be a higher level, but what Yellowhammer
 23 taught us, I think, was the need for whole-system
 24 responses to a big emergency of the Yellowhammer sort.
 25 I think that's applicable. And also the need for
 32

1 departments to work collaboratively together, that's
2 applicable. So it was very much based on that
3 experience plus the knowledge that planning for a large
4 emergency requires communitative(sic) approaches, and
5 having just the list of actions would not be sufficient
6 in a big emergency, you've got to be able to understand
7 how each risk and how each action overlays, impacts and
8 hopefully supports each other.

9 **Q.** So if we just perhaps have a look at your -- the
10 document you drafted.

11 And we have this at INQ000208070 and I think if we
12 could go to page 2 of that, please.

13 Probably just need to make sure you can orientate
14 yourself in this. We can see you sent it on 17 March,
15 and I think that the document is effectively set out in
16 this email.

17 **A.** Yes.

18 **Q.** If we could just scan down, please, thank you.

19 So I think just under your name, Ms Pearson, we can
20 see the way that you set this out. So if we look at
21 "Planning":

22 "- All parts of the public sector will refresh and
23 be ready to invoke response plans.

24 "A joined up approach across the public sector ..."

25 And you refer there to a base case and planning

33

1 absolutely driving whatever plan we end up with. So
2 here I'm putting down a marker.

3 **Q.** Yes. This isn't a criticism of you, Ms Pearson, it's
4 just trying to understand whether or not any of these
5 components actually existed at the time, or whether you
6 had any such documents that you were actually using as
7 a basis for this. But I think, as I understand what
8 you're saying, you weren't sitting down with a set of
9 planning assumptions at this point in time, because they
10 didn't exist?

11 **A.** I'm saying I didn't sit down with a set of planning
12 assumptions. They may well have existed, but I'm
13 writing this on day one, so --

14 **Q.** Yes.

15 **A.** -- I'm just putting down a marker that the plan needs to
16 be in line with those items. On day one I wouldn't know
17 if they existed for Covid or not. I would have known
18 more about the EU exit planning assumptions.

19 **Q.** And then just again in terms of, and I think it's right
20 that you set out six, as it were, headlines that the
21 planning should be based around, so we can see for
22 decision-making, political and administrative, clear and
23 transparent. So again this is all very much at a high
24 level, isn't it?

25 **A.** Yes, yes.

35

1 assumptions which reflect the issues likely to arise for
2 Northern Ireland.

3 When you drafted this, was there a base case and was
4 there a set of planning assumptions that you were
5 working on?

6 **A.** This is an outline of where we eventually got to.

7 I wasn't making assumptions around the base case. I was
8 saying that the plan had to be grounded in the base
9 case, and the base case and the reasonable worst-case
10 scenario would have come from the civil contingencies
11 side, but that the plan had to be in line with whatever
12 that was.

13 **LADY HALLETT:** What do you mean by base case?

14 **A.** So reasonable worst-case scenario is --

15 **LADY HALLETT:** I know what that is. Are you using those
16 interchangeably?

17 **A.** Yes, I am. So the base case is what you might see, and
18 the reasonable worst-case scenario takes you up another
19 level.

20 **MS DOBBIN:** And, again, the planning assumptions, did those
21 exist or were you saying as part of this plan "We need
22 some planning assumptions"?

23 **A.** Probably closer to the latter. This is written on the
24 first day of my post, so I'm taking an approach here
25 that says: the planning assumptions need to be

34

1 **Q.** And if we go just further on into this document, you
2 then set out in a bit more detail, don't you --

3 **A.** Yes.

4 **Q.** -- under each heading, and again I think we see here, if
5 we look at planning and we look at the very last
6 paragraph under -- above "Actions":

7 "The starting point would be the articulation of the
8 base case and planning assumptions, including the
9 reasonable worst case scenario for Northern Ireland ...
10 read across to other planning considerations ..."

11 If we just continue through and under
12 "Decision making", I think you go on to say -- yes, it's
13 at the top of that page:

14 "There will need to be a set of clear and strong
15 objectives for the response ... starting with health and
16 well-being ... this may drive a citizen centric approach
17 to planning and response, taking account of short,
18 medium and long-term and economic [wellbeing] ..."

19 Again you're talking there, "this may drive
20 a citizen centric approach to planning". On that day
21 did you see or did there exist any such documentation or
22 material about a citizen centric approach to planning?

23 **A.** Not that I was aware of, no.

24 **Q.** Again if we look, I think you set out some actions,
25 that's at page 6.

36

- 1 **A.** Yes.
- 2 **Q.** So we can see just at the very top of that page,
3 collective decision-making would be the default, the
4 Executive or the CG, so again coming back to the
5 contingencies, the Civil Contingencies Group would be
6 the forum, objectives and values would be agreed,
7 arrangements would be stored up and prioritised.
- 8 It might be thought that these are all really
9 rudimentary parts of responding to a pandemic, and that
10 someone would have thought about them before you came
11 along and drafted this plan on 17 March. Had they in
12 fact been thought about?
- 13 **A.** Looking at this now, I think I am stating the obvious
14 here, that collective decision-making would be in the
15 Executive and CCG(NI) would be part of the overall
16 response. I don't think I could say that I was
17 conscious of what thought had been given, but they're
18 the only things that could have happened.
- 19 **Q.** You've said that you think it's a statement of the
20 obvious, but -- and it might be, but I think nonetheless
21 the issue remains as to whether or not anyone had
22 actually given thought to what the proper structures
23 would be for making decisions and specifically whether
24 or not thought had been given to what the role of the
25 Executive Committee would be within the civil

37

- 1 is just so fundamental.
- 2 **Q.** But what all of the plans say is that the CCG would be
3 the decision -- the strategic decision-making body
4 within civil contingencies in Northern Ireland. That's
5 quite difficult to reconcile with your saying, well,
6 anything that's cross-cutting would have to be decided
7 with the Executive Committee. So does that not suggest
8 there was a lack of clarity as to how decisions would be
9 made?
- 10 **A.** The role of CCG(NI) is not to be a policymaking forum,
11 it's the collective response to an emergency, and its
12 role in our new framework, I wouldn't be able to point
13 you to where it is in the old protocol, but the role of
14 CCG(NI) is very tightly defined in the framework, it's
15 there to drive the emergency response, it's not there to
16 supplant the role of ministers in policy
17 decision-making, and it's perfectly possible, in my
18 view, and this is what happened, to have both running in
19 tandem, and CCG(NI) will take decisions, it does take
20 decisions, it will allocate resources, it will task out
21 certain actions, but it will not supplant the role of
22 the Executive in any way, but it's got to be there to
23 support that decision-making process. That's why I've
24 mentioned both.
- 25 **Q.** We know that there was a review carried out of the civil

39

- 1 contingencies arena.
- 2 **A.** Within the civil contingencies arena, I think that --
3 I'm not sure what -- forgive me. I'm not sure what
4 thought would have to be given to the role of the
5 Executive. It's so fundamental, and in our doctrine on
6 civil contingencies, CCG(NI) would be where you would go
7 at the right point in time. I don't think anybody --
8 forgive me, I don't think anyone would have had to sit
9 down and come up with those answers, because it's just
10 where you'd have to go.
- 11 **Q.** I think we will see, I won't take you to it, and I think
12 maybe it's a question for ministers, but I think on
13 19 March at an Executive Committee meeting, ministers
14 did raise the question of what the proper role of the
15 Executive Committee was within decision-making, and
16 therefore it may not necessarily have been that clear.
17 Were you aware of that at the time?
- 18 **A.** Yes, I believe I was at that meeting. But I think they
19 were looking for clarity on their role, not whether they
20 would have a role. The only legitimate decision-making
21 body on policy at this magnitude when it's going across
22 more than one department is the Executive. If they're
23 asking for assistance on: what does that look like, how
24 do we shape it, how often should we meet, I think
25 they're natural questions, but the role of the Executive

38

- 1 contingencies arrangements, I don't think you've been
2 asked about it, and it's not in your EP, so I don't want
3 to ask you questions about something that you're not
4 familiar with, but you may be aware of it, and it did
5 find that the CCG didn't operate as intended because it
6 wasn't a decision-making body and because most decisions
7 did end up being taken by the Executive Committee.
8 I think that's right, isn't it?
- 9 **A.** That is correct, and to be fair I think I do touch on it
10 in my statement, so I'm perfectly happy with this.
11 CCG(NI) needs to be understood for what it is, and if
12 the people conducting the review thought that it should
13 have been taking policy decisions then I would have to
14 disagree with the review. You can't supplant the
15 Executive role.
- 16 **Q.** Yes. There's obviously a difference between making
17 policy and giving effect to policy and obviously that
18 might well be the proper role of the Executive
19 Committee, but in an emergency, you're not likely to be
20 making fine-tuned policy decisions, you're probably
21 going to be making fairly sharp-edged decisions?
- 22 **A.** Yes.
- 23 **Q.** And I think is it also right, though, that after a time
24 those were in fact the decisions that were being made by
25 the Executive Committee rather than by the CCG?

40

1 **A.** The Executive Committee right from the start was making
2 decisions on policy, restrictions, allocation of
3 resources, CCG was doing something completely different,
4 which is managing the emergency response in realtime,
5 and CCG has to operate in the context of what the
6 Executive and ministers want to do in policy, and the
7 Executive will be cognisant of what CCG is telling it
8 about the nature of the emergency and the response
9 actions that have been tasked out.

10 So they're just two very, very different creatures,
11 in my mind.

12 **Q.** Okay. We know that until the middle of March there had
13 been one CCG meeting on 20 February, which was attended
14 by officials, and one CCG meeting that had taken place
15 on 12 March, which was attended by ministers. Were you
16 surprised when you came into your role on 17 March that
17 there had in fact only been one officials' meeting up
18 until that point?

19 **A.** I don't recall being surprised particularly. When you
20 look back now, I suppose if CCG had stood up a little
21 bit earlier that might have been good, and I think
22 David Sterling has said that, but CCG(NI) is -- it's
23 a huge undertaking, and you should stand it up at the
24 right point, and I think it eventually stood up in full
25 mode on 18 March.

41

1 seem to have featured or been thought about?

2 **A.** But it's a fact that CCG was only stood up at that
3 point, yes, that's true.

4 **Q.** Can I go on, then, to the strategy that you drafted,
5 please, and I think -- and it may be I don't need to
6 take you to this, let's see if we can deal with it
7 without the documents first, but I think when you came
8 at the end of March to drafting, I think, a more
9 considered and --

10 **A.** Yes.

11 **Q.** -- overarching strategy, that it was envisaged that
12 there would be a health response within it, so it would
13 be a truly cross-cutting departmental response that took
14 in the Department of Health, but that didn't eventuate
15 and the Department of Health effectively didn't want its
16 response to be encompassed within a cross-departmental
17 strategy; is that right?

18 **A.** Yes, I think that the genesis of that is the Executive
19 in discussion of the draft asked for that to happen, and
20 I think Minister Swann wrote to say --

21 **Q.** Yes.

22 **A.** -- that wasn't going to happen. I think it's fair to
23 note, though, how much discussion there was of the
24 health response at the Executive, particularly in the
25 early days. So it's not as if the Executive didn't know

43

1 **Q.** Yes. Just looking at one that takes officials, so not
2 one -- I mean, I don't think there are any rules about
3 who has to be there, I think you can have one that's
4 just civil servants, it might just be thought really
5 surprising that in the run-up to a pandemic, when
6 there's very clear and emerging evidence that its spread
7 to Northern Ireland would be inexorable, that there was
8 only one meeting before the 18th, one meeting of
9 officials before 18 March?

10 **A.** One meeting of officials in CCG mode, but officials
11 would have been meeting in other fora, and I think
12 Sir David covered that in terms of Friday meetings of
13 the permanent secretaries group. So I wouldn't want to
14 assume that it was not discussed anywhere else.
15 I wouldn't know, but I wouldn't want to make that
16 assumption.

17 **Q.** But the specific purpose of it was to draw people
18 together in order to consider planning for what was
19 going to happen.

20 **A.** Yes.

21 **Q.** So it had a very specific remit and focus?

22 **A.** That's correct.

23 **Q.** Do you think it's that that might be thought surprising,
24 the need to have that kind of formal structure and
25 consideration, before 18 March, it just doesn't really

42

1 what was happening, but it is true to say it was not
2 encompassed into that plan, that's correct.

3 **Q.** I'm going to go on to ask you more about the role of the
4 Department of Health. If maybe we can go to your plan.

5 And we have that at INQ000258405.

6 I'm sure you're familiar with this, Ms Pearson, but
7 I think if we just maybe go to page 2, so those are the
8 three strategic priorities; correct?

9 **A.** Yes.

10 **Q.** Then we have the governance framework at page 3, which
11 is quite familiar, and quite simple, as it were. That's
12 effectively the flow of information, isn't it --

13 **A.** That's correct.

14 **Q.** -- to the Executive?

15 **A.** Yes.

16 **Q.** Then we have the planning assumptions as at 28 March.

17 And at this point in time it was thought that the peak
18 would be in May and June 2020, and that's
19 notwithstanding -- it's obviously the end of March, but
20 that was still -- that was the basis upon which the
21 planning was taking place; is that correct?

22 **A.** That's correct, sorry, yes.

23 **Q.** If we look -- yes, it's over the page, please,
24 thank you, at page 6.

25 "Health and well-being", and at 1 I just notice that

44

1 you referred to a 1% fatality rate as well.
 2 Can I check whether or not it was understood at that
 3 point that that wasn't a case fatality rate? Were you
 4 familiar with the distinctions at that point in time?
 5 **A.** No. I've included that from Department of Health,
 6 I think.
 7 **Q.** So that's what you understood at the time --
 8 **A.** Yes.
 9 **Q.** -- that that was -- and again, that was the basis upon
 10 which this plan --
 11 **A.** Yes.
 12 **Q.** -- was premised.
 13 I think again if we just, and this is just to give
 14 the Chair an idea of what this plan looked at, I think
 15 if we look at page 9, when it comes to -- and this is
 16 "Health and well-being of citizens". Again I take it
 17 this is absent, then, any input from the Department of
 18 Health?
 19 **A.** It's absent of the health plan being part of this, but
 20 I don't think it's absent of information from health, if
 21 I can put it that way.
 22 **Q.** I think if we perhaps have a look at page 10, please,
 23 and again if we look -- for example, I'm just looking at
 24 children:
 25 "Ensure children, vulnerable ... and the

45

1 **Q.** -- as a whole, and not intended to provide them with any
 2 granularity, as it were, in terms of what they should do
 3 or ... if I took, for example, 1.8, or 1.9, for example,
 4 the safety of children in care, obviously there's a huge
 5 number of areas of legislation and policy that that
 6 would touch upon?
 7 **A.** That's correct. That's correct. I think I said in my
 8 statement that the plan was not intended to cover
 9 absolutely everything, it would have been vast and
 10 unwieldy, and I don't think it would have assisted the
 11 Inquiry, and that was the most important thing in this
 12 plan, to let them see and generate a collective effort.
 13 **Q.** So where would they get an understanding or how would
 14 they be sighted on the much more granular detail, or, if
 15 we took the safety of children, for example, the fact
 16 that -- and obviously we're in lockdown at this point in
 17 time.
 18 **A.** So that's the responsibility of individual ministers.
 19 I'm sure you're going to take me on to this, but what we
 20 produced for them was a series of presentations that
 21 they could call individual ministers in on to get into
 22 the detail, but we were not trying to bog the Executive
 23 down with all of the actions that were going on, because
 24 individual ministers were well capable of delivering
 25 within their own departments, but there had to be

47

1 self-isolating have access to food and medicines."
 2 Making sure arrangements are made for "safety in
 3 care and custody".
 4 Again, if I may just try to get some idea of what
 5 this was intended to do, because this is obviously very
 6 high level --
 7 **A.** Yes.
 8 **Q.** -- again.
 9 What was this intended to provide for the Executive
 10 Committee or for the Executive Office? What was it
 11 going to do?
 12 **A.** It was going to give them a way of looking across
 13 a number of risks and actions collectively rather than
 14 leaving specific actions solely to departments. It was
 15 to help them then commission certain presentations as we
 16 moved through this from other ministers to get into more
 17 detail, and it was to give them collective ownership of
 18 the actions rather than each minister being left to
 19 their own devices on it.
 20 **Q.** So was this supposed to provide them with the most
 21 important issues that they effectively needed to have
 22 insight --
 23 **A.** Yes.
 24 **Q.** -- whenever they were meeting --
 25 **A.** Yes.

46

1 a collective way of understanding what was happening
 2 across the piece.
 3 **Q.** Yes, and was the idea that this sort of document would
 4 inform, then, each meeting, for example, or were
 5 ministers supposed to keep abreast of this, and to
 6 continuously review and think about: where have we
 7 reached, for example, with child protection or ...
 8 **A.** I would say both. So this document did go to many
 9 meetings until we reached the point in time review, it
 10 went to many meetings, but it gave the Executive
 11 a chance to look at: what do we think the big risks are
 12 at the moment? So we provided a heat map -- sorry for
 13 the jargon -- we had a heat map that showed which ones
 14 we thought were flashing red, and that enabled them to
 15 prioritise the order in which they were asked for
 16 specific presentations from individual ministers. But
 17 individual ministers were then delivering huge amounts
 18 and were still going to the Assembly in various formats
 19 and -- to update on their departmental work.
 20 **MS DOBBIN:** I think that might be an appropriate moment to
 21 have a morning break.
 22 **LADY HALLETT:** Of course.
 23 **MS DOBBIN:** Thank you, Ms Pearson.
 24 **LADY HALLETT:** I shall return at 11.30.
 25 **(11.12 am)**

48

(A short break)

- 1
2 (11.30 am)
3 **LADY HALLETT:** Ms Dobbin.
4 **MS DOBBIN:** Thank you, my Lady.
5 Ms Pearson, I just wanted to finish off, if I may,
6 then, on the planning at this critical point in March.
7 What you've said in your statement, I don't need to take
8 you to it, but you said that it would have been
9 preferable if there had been a contingency plan, I think
10 you mean at an earlier stage.
11 Was there any such plan, whenever you look up your
12 position on 17 March, or are you saying effectively that
13 your plans became the contingency plans?
14 **A.** My plan became the response plan, in realtime. I think
15 if there had been a full set of plans they still would
16 have needed a lot of attention at that point, because
17 they would have been planning for flu and not Covid.
18 I think Chris was clear on that yesterday, and I agree
19 with him. I think that's what we would have had to do,
20 is take any existing plan and then turn it into
21 something more specific for Covid.
22 **Q.** But, I mean, we haven't seen a developed plan even based
23 on a flu plan in Northern Ireland; I think that's right,
24 isn't it?
25 **A.** I think that's correct, yes.

49

- 1 I think it's right, understanding that there are
2 tensions here between the Department of Health and the
3 ministers; is that correct?
4 **A.** That's how it looks, yes, for certain, yep.
5 **Q.** I'll come on to what you say about this, but I just
6 wanted to ask you a bit, if I may, about the first
7 response that was sent to this email.
8 Please may we scroll up, thank you, there is
9 a response from someone called Mr Hugh Widdis, and is he
10 a civil servant as well?
11 **A.** Yes.
12 **Q.** We can see that what he sets out, and it's really in the
13 last bit of his email, where he says:
14 "There would be more radical options but I presume
15 they aren't palatable ... asking Robin to take
16 a different portfolio for the duration (they would have
17 to make a tempting offer) and putting a [Sinn Féin] or
18 [a] DUP minister in.
19 "Or causing d'Hont to be run again (... by changing
20 the number of departments) ... so that they take [the
21 Department of Health]?"
22 I mean, this is only 26 March, but had things
23 reached a point by then that there was even thought
24 about removing the health minister to take on
25 a different role?

51

- 1 **Q.** I'm going to move on, then, to deal with an issue that
2 I think may be quite important, and I just want to spend
3 a bit of time on it, again, maybe to help the Chair
4 understand some of the structural issues, and it's just
5 going back to the role of the Department of Health, if
6 I may, and to ask you an about specific email exchange
7 to see if it illuminates that point and to see if you
8 can help us with it.
9 It's INQ000287536, please, and it's page 2. We've
10 seen part of this email conversation. I think you've
11 seen this before, haven't you, Ms Pearson?
12 **A.** I have, yes.
13 **Q.** That's fine, I just wanted to check. I think we can
14 see, first of all, the email that we took Sir David to
15 whenever he gave evidence, and it's the one where he
16 sets out, I think, the particular concern on the part of
17 the deputy First Minister effectively -- I'm
18 summarising -- not feeling in control, not having power
19 or influence over the health minister, and I think that
20 the position of the First Minister was perhaps a little
21 more circumspect but equally that she was frustrated too
22 about, I think, the lack of control over information
23 that was coming out of the Department of Health. And
24 I think we will see that you're part of this email
25 chain, so you're obviously very new to this role, but

50

- 1 **A.** I think there's two parts to that. David Sterling
2 I think described that period of time as being the most
3 difficult in and around the closure of schools, it was
4 an incredibly difficult time. He does then go on to
5 say, I think, when he was in here that things got
6 better, so I think this is very much a snapshot of how
7 difficult things were at that time.
8 Had it reached the point where any of this was being
9 contemplated? No, I don't think so. And with respect
10 to Hugh, who I've known for a long, long time, I don't
11 think he was making any firm suggestions, I think he was
12 setting out, if they wanted to take control these are
13 some constitutional options.
14 **Q.** Yes.
15 **A.** I don't think it's the job of civil servants and nor do
16 I think Hugh personally would be making a suggestion
17 about the removal of a minister.
18 **Q.** Right. If we look above that, we can see that he was
19 also suggesting some other options, effectively, and
20 again I'm summarising, but so that there could be
21 greater control over the Department of Health; correct?
22 So he suggests an overarching Covid strategy that the
23 ministers, the First Minister and the deputy First
24 Minister could lead and own, that the Department of
25 Health would have to abide by and operate within that

52

1 strategy. An emergency programme for government which
 2 is just Covid focused. Calling more decisions into the
 3 Executive as significant or controversial, this might
 4 slow down decision-making. A proper subcommittee on the
 5 public health aspects of Covid with just the
 6 First Minister and deputy First Minister perhaps meeting
 7 weekly in full Executive meetings where the decisions
 8 could be ratified.

9 **A.** Yes.

10 **Q.** Again, in terms of what that demonstrates to us, again
 11 it would tend to suggest that there was a real sense on
 12 behalf of the First Minister and the deputy First
 13 Minister that they just didn't, as it were, have
 14 a handle on what the Department of Health were doing in
 15 response to the pandemic; is that correct a fair
 16 assessment?

17 **A.** I think from Sir David's read-out at the bottom, at that
 18 point in time that's a fair assessment. What Hugh is
 19 talking about, I think, is just some Civil Service
 20 options for structures and reporting arrangements, but
 21 I can see from this that he was trying to tailor that to
 22 the concerns that David had set out below.

23 **Q.** Yes, and I think what Sir David, over the page, --
 24 sorry, I'll make sure I'm accurate about this.
 25 Mr Widdis is also responding, we've already seen this,

53

1 **Q.** -- and we see your reply, and I wanted to ask you a bit
 2 about each of the things that you say about that.

3 So you said:

4 "We have some things in place:
 5 "- six priorities."
 6 Those are the six priorities that you had set out in
 7 your original plan of 17 March; correct?

8 **A.** Yes.

9 **Q.** And:

10 "- a draft framework for collective ...
 11 responsibilities."

12 **A.** Yes.

13 **Q.** Was that your 30 March plan or was that a different
 14 plan?

15 **A.** Can you just remind me of the date --

16 **Q.** It's 27 March.

17 **A.** Yes, it's -- that would be the 30th.

18 **Q.** That's fine.

19 **A.** A single document doing those two different things.

20 **Q.** I thought that, but I just wanted to check.

21 Then you set out:
 22 "What's not working?
 23 "- Ministers are just back
 24 "- a new ministerial team
 25 "- a real crisis which they can not control and it

55

1 to the concern that was being expressed by the deputy
 2 First Minister that they might be held corporately
 3 responsible as well or liable if things were to go
 4 wrong, and I think Mr Widdis is also addressing that,
 5 isn't he, at the top of the email?

6 **A.** Yes.

7 **Q.** I can only imagine that worldwide all parties who happen
 8 to be in government fear they'll be held responsible if
 9 they get this wrong:
 10 "No one remembers Chamberlain for anything other
 11 than Munich."
 12 Correct?

13 **A.** Yes.

14 **Q.** So again I think pointing to a different type of concern
 15 then on the part of the deputy First Minister that if
 16 things were going to go -- if things went wrong
 17 effectively it would be they who would be responsible
 18 and liable for it; yes?

19 **A.** Yes. Of course we're looking at David's read-out of the
 20 conversation, so I think what Hugh says there is a fair
 21 reflection of what David has said below. I don't think
 22 I could go further than that because I wasn't in the
 23 discussion.

24 **Q.** All right, but you do reply --

25 **A.** Yes.

54

1 is scaring them

2 "- some [departments] doing things which take them
 3 by surprise"

4 I'll just stop there, what did you mean by
 5 departments doing things that were taking them by
 6 surprise?

7 **A.** That's a reference to Department of Health, as it's all
 8 on that same chain, that there might have been another
 9 couple of examples but I can't bring them -- I can't
 10 bring them to mind, sorry, but there was concern that
 11 they were being bounced in different ways.

12 **Q.** Then:

13 "- haven't moved to delivery confidence mode yet"
 14 I'm afraid you might have to help us with what
 15 "delivery confidence mode" means.

16 **A.** Sorry about that. What that means is that you can have
 17 a plan, but you need to know whether it's working, you
 18 need to know what actions are being delivered, and you
 19 need to know what overall level of confidence that
 20 you've got that the situation's getting at least
 21 stabilised or will improve and eventually does improve.
 22 So sorry about the jargon, but that's what I meant.

23 **Q.** And is that, we know from the notes of 18 March of the
 24 Executive Committee meeting that there was that sense of
 25 them not -- that's -- we see reference to them being in

56

1 response mode, and I think -- again, I'm generalising,
 2 but a sense perhaps of ministers feeling that they
 3 weren't in command of the response.
 4 Would you, again, agree with that assessment, that
 5 that was a general sense on their part?
 6 **A.** So if I could go back to that difference between
 7 response and Executive decision-making.
 8 **Q.** Yes.
 9 **A.** By this point in time, 27 March, I think, the Executive
 10 is meeting, and it is discussing plans --
 11 **Q.** Yes.
 12 **A.** -- and CCG is operational. What I think they were
 13 concerned about was the delivery, stabilisation and
 14 improvement.
 15 I think on 23 March Minister O'Neill had given
 16 a statement in the Assembly jointly for herself and the
 17 First Minister that set out some key principles that
 18 they'd set out their objective. But from memory,
 19 I think it listed a lot of actions that had been
 20 delivered already. And that's what I mean by delivery
 21 confidence, they need to be able to see that things are
 22 being done and things -- and to have that sort of
 23 structured hope: things are going to get better because
 24 they've got a plan in place.
 25 **Q.** Right, so that's what effectively was felt to be missing

57

1 I would. But this was at a difficult period in time,
 2 but they were -- it was their priority. It was their
 3 priority.
 4 **Q.** Was there a sense of them having been taken -- that they
 5 were taken by surprise that things had gone quite as
 6 badly as they had? And when I say "gone badly", that in
 7 fact that infection rates were as high as they were and
 8 that they were being confronted with people losing their
 9 lives at this point?
 10 **A.** No, I don't think so, I think by the time you get to the
 11 declaration of a pandemic and the early discussions,
 12 unfortunately, that they had to have about the likely
 13 impact of the virus, no, they were not in surprise mode.
 14 My reference here is that things were being done that
 15 took them by surprise.
 16 **Q.** And in terms of the point when they realised or it had
 17 crystallised what was likely to happen, when was that?
 18 When would you say that happened?
 19 **A.** I couldn't pin it to a date. It was an evolving
 20 situation even at this point -- an evolving situation
 21 even at this point in time, but the picture coming out
 22 from Department of Health from a very early stage was
 23 showing that this was going to be serious, there's no
 24 doubt about that.
 25 **Q.** But was that after you'd arrived?

59

1 at that point, was that in fact there was a response,
 2 things were happening in Northern Ireland, but that
 3 confidence wasn't there on the part of the
 4 First Minister and the deputy First Minister?
 5 **A.** Delivery confidence about the actions that they wanted
 6 to see, and of course at this point the case numbers are
 7 continuing to rise.
 8 **Q.** Yes.
 9 **A.** They will also have been hearing from constituents about
 10 the impact of restrictions. So that's quite a mix of
 11 things for them to grapple with when they're just back
 12 and it's a new team and they're being taken by surprise.
 13 So --
 14 **Q.** Yes.
 15 **A.** -- there was kind of a structure to my list in this
 16 email of why I thought they might be as worried as David
 17 was portraying here.
 18 **Q.** I was going to ask you about that, the reference to them
 19 being frightened. Was that because of the numbers of
 20 people who were becoming infected and --
 21 **A.** Absolutely.
 22 **Q.** -- dying at this stage?
 23 **A.** Absolutely. That was the most important thing for them,
 24 that they could do something about that.
 25 Would I now use the word "scaring"? I don't think

58

1 **A.** No, I don't -- I don't think -- I don't think so,
 2 I think that would have been earlier.
 3 **Q.** When you arrived, did you get a sense of panic on the
 4 part of ministers or urgency about what was happening?
 5 **A.** Not panic, but definitely urgency.
 6 **Q.** Right.
 7 You've also said here:
 8 "- focusing on specific issues, not seeing the
 9 overall picture"
 10 What was that a reference to?
 11 **A.** That's a reference to -- I think it's almost a repeat of
 12 being taken by surprise by things, so they -- it was
 13 right that they were having to focus on a small number
 14 of issues as laid out in the plan, but they were never
 15 going to be able to see every point of detail in
 16 departments, that's just not realistic.
 17 **Q.** I think we can -- I think everyone will understand that
 18 when you lead, as it were, when you do have the roles
 19 that they do, that being involved in the granularity of
 20 what every department is doing is not realistic and
 21 might be even damaging, but that's not what that's
 22 suggesting, that's suggesting that they just have their
 23 own specific points or specific things that they're
 24 interested in potentially.
 25 **A.** From memory, at the time, the conversations in the

60

1 Executive were focusing on things like contact tracing,
2 PPE supplies. What they didn't have, in my view, is the
3 overall health picture, and I know you touched on that
4 yesterday. I think that's all I can say about it at
5 this point in time.

6 **Q.** All right.

7 The final thing that you say is they're:

8 "- falling back on party ways of doing things"

9 Which may be the most important point here. Can you
10 tell the Inquiry a bit more about that, please.

11 **A.** Yes. So I cover this in detail in my statement.

12 I think, and this is a personal view, it's impossible to
13 stop being a politician when that's your job and you're
14 elected. So you go into an Executive, and you're
15 bringing your constituency with you, you're bringing
16 your views and your politics with you. Here even more
17 so than anywhere else.

18 Having to compromise all the time is almost the
19 structure that's built into the system, but you can
20 occasionally fall back into very different viewpoints,
21 and I think that's what Sir David was talking about on
22 the education piece, which was what I think caused this
23 email exchange.

24 **Q.** All right. So that's the first schism, as it were, that
25 had arisen, that these -- that different positions had

61

1 priority. What I'm suggesting is they're going to come
2 at that from angles. But having that fundamental core
3 objective of making this better was there. I have
4 absolutely no doubt about that in my mind.

5 **MS DOBBIN:** I'm going to come on to ask you a bit more about
6 that as time went on, but, I mean, to be clear about
7 this, it is right that certainly amongst civil servants,
8 that they regarded the first issue, as it were, that
9 ministers had to decide in Northern Ireland, that being
10 whether to close schools or not after 12 March, that
11 effectively that issue did become sectarianised, so to
12 speak, because one set of politicians, certainly the
13 Sinn Féin politicians, wanted to do as the
14 Republic of Ireland had done, whereas the other
15 politicians, the Unionist politicians, didn't wish to do
16 that, save that there was also medical advice at play as
17 well; correct?

18 **A.** I wouldn't use -- I wouldn't associate myself with the
19 word "sectarianise", if you'll forgive me. I think it
20 was an element of the political views that they were
21 holding, perfectly legitimate political views, that had
22 to be balanced. And I think Sir David was very clear
23 that it was problematic for them at that time, but then
24 things got better. Things got better.

25 **Q.** Because the medical advice at that time was that schools

63

1 been taken on schools and that that position had been,
2 I think, by and large, a politically informed one; is
3 that right?

4 **A.** It was politically informed, of course, but the health
5 advice was in there as well.

6 **Q.** Yes.

7 **A.** They were listening to that, so -- but I don't think we
8 can expect them to entirely leave their party political
9 views at the door. I don't think we can expect them to
10 leave their departmental views at the door. But beyond
11 this point, I think we were seeing huge efforts at
12 compromise all the time and on an ongoing basis. That's
13 the only way to get business done.

14 **LADY HALLETT:** Can I just challenge that? In a time of
15 a national emergency when people are dying, can't we
16 expect politicians to leave their party politics behind
17 and think of the people who are suffering and dying?

18 **A.** Forgive me, my Lady, I'm not suggesting --

19 **LADY HALLETT:** Or am I being unrealistic?

20 **A.** No, I'm not suggesting that what I said there about
21 party political views means that they're not caring
22 about the people. I think I said earlier that the
23 concern about the virus and the impact on people, the
24 health outcomes, and unfortunately people were going to
25 lose loved ones, that was absolutely top of their

62

1 didn't need to close; correct?

2 **A.** Correct.

3 **Q.** But the Republic of Ireland had closed --

4 **A.** That's correct.

5 **Q.** -- schools, and some politicians wanted to do as the
6 Republic of Ireland had done. And did you understand
7 whether or not there was at that point in time
8 an understanding of why the Republic of Ireland had
9 decided to take that position, in other words what
10 epidemiological basis there was for it? Was there that
11 kind of consideration?

12 **A.** I don't recall that being the case. I think it was
13 a decision had been taken, so: what do we now do? Two
14 different viewpoints, with medical advice in the mix,
15 but then a decision eventually to close, all in a short
16 period of time.

17 **Q.** Yes.

18 **A.** So that is going to create a bit of tension, it's just
19 going to.

20 **Q.** All right.

21 You've suggested effectively that things got better
22 and that there was a period, I think, of greater
23 cohesiveness. We saw when Sir David gave evidence that
24 he had written an email at the time effectively saying
25 that Northern Irish politicians had been spared having

64

1 to make the really big decisions because they had
2 effectively been made for them, and that on the
3 occasions then when they were required to make
4 a decision about something, schools and key workers
5 I think were the two things, that they had been found
6 wanting, so to speak. Would you agree with that
7 assessment?

8 **A.** The big things being decided for them, I think I cover
9 that in my statement as well, that -- things like
10 furlough being in place?

11 **Q.** Yes.

12 **A.** So the fact that some decisions that may need to be
13 taken for medical reasons that would have had impacts
14 for people's livelihoods and the economy, furlough was
15 an amazing cushion for that. As we moved through,
16 though, it still fell to them to decide when to lift
17 certain restrictions, and that's when I felt things were
18 getting better. Particularly by the time you got the
19 12 May Pathway out of Restrictions, they had an agreed
20 set of things. And they didn't always move at the same
21 time as the rest of the UK, they were taking their own
22 decisions, and that's where I saw really good compromise
23 and working in the Executive.

24 **Q.** All right.

25 I do then want to come to ask you a bit about that,
65

1 behaviours, the social interactions, because you can
2 still have guidance and you can still have campaigns
3 around what you want people to do. So I think it's
4 a little bit more complex than just the restrictions.
5 But the lifting of restrictions is also a signal that
6 we're able to lift restrictions because we're in
7 a situation that is, I'm not going to say improving
8 because it was still in community transmission and we're
9 still getting, unfortunately, deaths, but it does -- it
10 does send a signal. And the reality is we can't keep
11 people in restrictions and lockdown forever, it's just
12 not possible.

13 **Q.** Yes. All right. So I think what in fact happened was
14 that infection rates started to go up quite quickly?

15 **A.** With the first lifting of restrictions to infection
16 rates going up, I actually think there was a period in
17 between things -- the case numbers were very, very low.

18 **Q.** I think it's probably right in June -- in June, I think,
19 that there was probably -- I think we can see a number
20 of points at which levels had gotten very low.

21 **A.** Yes.

22 **Q.** But I think it's right, but we can go to the documents
23 if we need to, that certainly transmission rates amongst
24 young people started to go up --

25 **A.** That's right.

67

1 if I may. So I won't ask you to -- we won't go to the
2 strategy for lifting restrictions, but I think it's
3 right that there was a strategy document that set out
4 a sort of stratified approach to lifting restrictions.

5 **A.** Yes.

6 **Q.** And I think that overall the idea was that they would be
7 lifted incrementally with a period of time built in to
8 see what the effect was, and that was so that there
9 could be some sort of measurement of what the cumulative
10 effect of lifting restrictions was. Is that correct?

11 **A.** That's correct.

12 **Q.** I think it's right, I think there are two things, and
13 you do address this in your statement, at paragraph 183,
14 I think it's correct that, first of all, there were
15 quite early warnings about the risk of a second wave,
16 that the CMO was effectively making that clear; is that
17 right?

18 **A.** That's correct.

19 **Q.** And, please, if this is incorrect or too simplistic, but
20 that once restrictions started to be lifted in effect
21 that there was a real risk that there would be a second
22 wave?

23 **A.** It would depend -- I think that there's several elements
24 to that. It's not just the lifting of the restrictions
25 but it's then about how people react to that, the
66

1 **Q.** -- during the summer of 2020. And I think that it's
2 right that probably by August again the position -- the
3 rates were continuing to rise.

4 **A.** Yes.

5 **Q.** Does that accord with your memory? And then by the time
6 we get to September -- and I know you do deal with this
7 in your statement -- that in fact the position was
8 reached whereby local restrictions had to be brought in?

9 **A.** That's correct.

10 **Q.** Correct?

11 **A.** Yep.

12 **Q.** And those local restrictions were brought in across
13 a number of very specific areas?

14 **A.** Yes.

15 **Q.** And as it transpired, that wasn't effective for
16 arresting the rates of transmission; is that right?

17 **A.** That's correct.

18 **Q.** Do you agree that it is around this point in time that
19 one begins to see greater tensions then in the Executive
20 Committee about how to manage this acceleration in the
21 rate?

22 **A.** Yes, that may well have been the start of it, but it
23 wasn't the height of it. The tensions were starting to
24 come in. By "tensions" I mean different views on the
25 best way to deal with things, but the strategic
68

1 objective was never really subject of tension, and --
 2 I say in my statement -- and it was never as stark as:
 3 it's all about health or it's all about the economy.
 4 The debate and the compromise had to be about how you
 5 bring all those things together in a decision-making
 6 space and reach a good outcome. But there was increased
 7 debate, I would describe it as, rather than tension, at
 8 that time on what's the best thing to do.

9 **Q.** Yes, so the -- and I don't wish in any way to be too
 10 simplistic about it, but I think there were also splits
 11 between those who thought -- who agreed that there
 12 should be greater restrictions around this point in time
 13 and those who were worried about the other costs of
 14 those restrictions in terms of other health costs, cost
 15 to the economy.

16 I wondered if we could just go to a document in
 17 terms of where the position did reach.

18 I'm just going to check which is -- yes. It's
 19 INQ000306179. I think if we could go to page 5, please.
 20 This is an email from you, I think, sent very early in
 21 the morning, setting out where the position had reached.
 22 I think that you set out, we can see the reference to
 23 Northern Ireland being days away from being overwhelmed,
 24 significant implications for the economy. Thank you.

25 Yes, sorry, I'd missed it, it's in the first

69

1 critical?
 2 **A.** Yes, and I can't pinpoint it in my head at the moment,
 3 but I don't think I would have sent an email of that
 4 sort to senior colleagues without having spoken to
 5 Michael and Ian. I would have got my sense of the
 6 urgency about this from them. I think this was
 7 a Saturday and we did indeed meet the next day.

8 **Q.** I think in fact we might just see that in fact you're
 9 right and I think the Chief Scientific Adviser in fact
 10 replies, if we just go up the email. Yes, he says:

11 "The position's worsening rapidly."

12 **A.** Yes.

13 **Q.** And they're working on getting additional data.

14 I think in fact then if we go to page 1, we see the
 15 counterview being expressed. Yes, so that's Mr Brennan,
 16 who I think, was he from the department of economy?

17 **A.** Yes, he was the permanent secretary at the department of
 18 economy at the time.

19 **Q.** Then he sets out, we can see this at his second
 20 paragraph, that he appreciates "the rush to impose
 21 greater controls" and then puts it in terms of:

22 "Is it to protect the NHS through the winter period,
 23 minimise Covid deaths? If so what is the cost per death
 24 when assessed against the wider social, economic and
 25 non-Covid deaths ..."

71

1 paragraph, so there were rates of around a thousand
 2 cases a day which obviously for Northern Ireland was
 3 really --

4 **A.** Yeah.

5 **Q.** -- really alarming --

6 **A.** Yes.

7 **Q.** -- at that stage.

8 Then you set out, just going further down, the email
 9 that contingency arrangements were now essential, that's
 10 just at the bottom of the first page, that you were
 11 putting together a framework for decision-making, and
 12 then the choices that need to be made, and I think
 13 closing education was obviously one of the most
 14 significant ones.

15 Then setting out the list of issues that were of
 16 most concern.

17 But I think it's right, Ms Pearson, that once again
 18 at this stage the concerns were the twofold ones of the
 19 transmission rates going up at a really alarming rate
 20 and also the Northern Ireland health service was within
 21 a short distance of being overwhelmed as well?

22 **A.** Yes.

23 **Q.** Again can you, I mean, your email obviously conveys the
 24 concern and the urgency about that. Was that something
 25 that you felt at the time that this was -- that this was

70

1 Is that right?

2 **A.** That's what it says, yes.

3 **Q.** So that effectively might be thought to illuminate the
 4 issues that arose at this particular point?

5 **A.** I think Mike was being realistic about the debate that
 6 would be had in the Executive. I think if you look at
 7 this again, this is some time on, but what's the
 8 rationale? I don't think that's querying the need for
 9 action, because he starts with "I can appreciate
 10 the ..."

11 That can be read as an invitation to be very clear
 12 about why we are having to be in this space, because
 13 this is going to be a difficult Executive meeting.

14 **Q.** Yes, and it's going to be difficult because there were
 15 ministers who were already wedded or committed, perhaps,
 16 to the view that the costs needed to be analysed very,
 17 very clearly about having a lockdown at this -- or
 18 having any significant restrictions at this point in
 19 time?

20 **A.** I agree. I think that's right. I think this is a very
 21 realistic read-out from Mike. It's a heads-up of what
 22 what's going to come. But I don't think anyone was ever
 23 just: it has to be about the economy and nothing else.
 24 It's always a question of balance by this point in the
 25 autumn.

72

1 Q. If we just look at another document that helps put all
2 of this in context, and this is INQ000286275. This is
3 a meeting, well, it's a call, rather, that also took
4 place on 11 October. If we could just go to the next
5 page, please, but again I think we can see certainly
6 from the Ministry of Health, the concerns that were now
7 being, or the alarm bells that were being sounded.

8 I think we find here the concern that
9 Northern Ireland was ten days away from the health
10 service being overwhelmed?

11 A. Yes.

12 Q. I think in fact at around this time -- you may remember
13 this, I don't think I need to take you to it, but in
14 fact the rates in certain parts of Northern Ireland were
15 also referred to at COBR --

16 A. Yes.

17 Q. -- because they were amongst the highest in the
18 United Kingdom?

19 A. That's correct, particularly in certain geographical
20 areas, that's right.

21 Q. May I just ask you a question also about this.
22 Obviously Northern Ireland, it's not like the rest of
23 the -- it's not like England whereby capacity is shared
24 across a large geographical area and many hospitals, so
25 that if, you know, there are pressures in one area they

73

1 in time and the recommendation that was eventually made
2 by the CMO was that there be a six-month -- not
3 six months, a six-week period of more intensive
4 restrictions; correct?

5 A. That's correct.

6 Q. What you've said in your statement was that the prospect
7 of that became a very difficult one --

8 A. Yes.

9 Q. -- for the Executive Committee?

10 A. Yes.

11 Q. Again can you just explain a bit more about why that was
12 so difficult, notwithstanding the apparent issues that
13 were at stake?

14 A. So I think SAGE and I think the CMO were suggesting
15 something in the region of a circuit-breaker, I think
16 that was the language used at the time, rather than
17 a lockdown. So that would have meant a significant
18 reintroduction of a good number of restrictions for --
19 the recommendation was six weeks.

20 I think why they felt -- this is a personal view,
21 why I think they found that difficult at that time was
22 because they'd now got the lived experience of the
23 impact of restrictions on people, families, on education
24 and the economy, each minister would have seen it in
25 their own sectors, they'll have heard it from their

75

1 might be relieved in another.

2 In Northern Ireland, those concerns about the health
3 service being overwhelmed, are they more pressing
4 because there's less ability to share that pressure?
5 I hope that makes sense, but that --

6 A. Yeah, it does make sense. I don't feel able to answer
7 that.

8 Q. Okay.

9 A. I think that would be for the CMO. Sorry.

10 Q. Don't worry. But I think again we capture in this,
11 obviously again there is a sense, a real sense of
12 urgency almost coming off the page in respect of this?

13 A. Yes, that is correct, and as well as the case numbers
14 we'd also had the SAGE -- the SAGE --

15 Q. Yes, on 21 September?

16 A. Page 58, I think. So that's -- I recall this meeting,
17 this is the next day after the previous document that
18 you just put up, this is a Sunday afternoon, and the
19 Chief Medical Officer is very clear on his advice.

20 Q. Yes, because he's also saying it's not just days away
21 from the health service being overwhelmed but also very
22 significant numbers of deaths as well?

23 A. Yes.

24 Q. I think it's right, then, and you deal with this in your
25 statement, that what was being suggested at this point

74

1 constituents, so they had to go through a process of
2 balancing that, but it did start to ramp up the tensions
3 on quite what the right answer was at that point, yes,
4 that's correct.

5 Q. And again is it too simplistic to say that in fact those
6 tensions did separate along political lines at that
7 point?

8 A. To a large degree, yes. Yes. They're all individuals
9 as well, but yes, I think that -- I have to agree with
10 that, yeah.

11 Q. I'm accepting, and I need to make this clear, that
12 obviously Minister Swann was the person who wanted and
13 who was proposing the restrictions.

14 A. Yes.

15 Q. So I don't want to be too simplistic --

16 A. That's why I was hesitating slightly.

17 Q. Yes, and I think you're quite right to. But I think
18 it's fair and it's recorded in the minutes, but
19 effectively there was a -- and again I really don't --

20 I don't want to be simplistic about this, and you must
21 correct me if it's wrong, but effectively it became
22 a divide between Unionists on one side who were
23 advancing concerns, and again I don't want to put it
24 simplistically because it's not just about the economy,
25 it's also about the broader health costs of closing down

76

1 society, and on the other side the Nationalist
2 politicians had taken a different agenda, and I'm
3 conscious as well that in the mix there was a politician
4 who wasn't aligned to either, so again I don't want to
5 be too simplistic, but I think in broad terms that's the
6 way the division went.

7 **A.** The way I would describe it is there's five parties in
8 The coalition and each party I think had a different
9 view, I wouldn't go quite as Unionist/Nationalist,
10 because you've got two Unionist parties, two Nationalist
11 parties and then you've got the Alliance Party, so they
12 were bringing their views to that, yes.

13 **Q.** Yes, but I think the idea that I think people will come
14 at this as individuals and have a diverse range of
15 opinions, that wasn't right, they effectively separated
16 into two positions?

17 **A.** The two positions were -- and it wasn't about let's do
18 nothing, it was about what's the right thing to do, but
19 yes, I do agree with the way you've described it, yes.

20 **Q.** I think we also see at this point in time another theme
21 that emerges, which is scepticism, and again it's only
22 on the part of some ministers, about the science and
23 about the modelling.

24 **A.** I think I would describe it as an ongoing process of
25 robust challenge, whether some ministers sitting in the

77

1 **A.** Yes.

2 **Q.** And again that wasn't an agreed position, but it was
3 ultimately decided that there would be a four-week
4 period --

5 **A.** That's correct.

6 **Q.** -- of restrictions?

7 **A.** Yeah.

8 **Q.** And I think we then get to the point where the decision
9 had to be made whether or not to extend the restrictions
10 for two weeks. What you've said in your statement was
11 you, when this four-week period was imposed, couldn't
12 see why it would be lifted in effect unless something
13 changed in the interim; is that right?

14 **A.** Yeah, I think restrictions of that sort need an exit
15 strategy, and the best way to exit is because the
16 situation has improved.

17 **Q.** Yes.

18 **A.** And I think the tests in the Public Health Act around
19 necessary and proportionate as well are also important,
20 that if you can lift restrictions you're almost duty
21 bound to do that, so something has to change. The
22 four-week period was not what they were asking for at
23 the time, but that's what they got.

24 **Q.** So they got the four-week period, it got to the end of
25 the four weeks and the scientific advice and the

79

1 Executive simply didn't believe it, I don't think we
2 ever got to that point, but CMO and CSA were constantly
3 there to be challenged and they were well up for it, as
4 was Minister Swann. But, yes, I do agree we were
5 starting to see more and more "show me, tell me, prove
6 it" sort of thing.

7 **Q.** Yes.

8 **A.** But I don't think anyone ever went so far as to say:
9 I simply don't believe that.

10 **Q.** Yes. I think it's just a fact, I'm not --

11 **A.** Yeah.

12 **Q.** -- suggesting that there's anything wrong with
13 challenge, but I think it's just something that becomes
14 more obvious at this point in time, that there's more
15 questioning --

16 **A.** Yes.

17 **Q.** -- of whether or not the science is correct.

18 **A.** That's correct.

19 **Q.** And whether or not the modelling it correct as well; is
20 that right?

21 **A.** Yes.

22 **Q.** The recommendation that there be a six-week period was
23 rejected --

24 **A.** Yes.

25 **Q.** -- is that right?

78

1 position of Minister Swann was that there needed to be
2 a further two weeks --

3 **A.** Correct.

4 **Q.** -- so we were saying at the end of the four weeks "we
5 were right to think it would require six weeks and now
6 we need the extra two weeks"?

7 **A.** I think that's a fair summary, yeah.

8 **Q.** And we know that this then led to, I think it's one
9 meeting that goes on for four, across -- I think it's
10 four days, and were you at that meeting?

11 **A.** Yes.

12 **Q.** We know that ultimately that meeting went to
13 a cross-community vote in order to decide whether or not
14 there should be this further two-week restrictions. Can
15 you tell us, then, something about the tone of the
16 meeting?

17 **A.** It -- I think going into it, it was going to be
18 difficult, right from the outset. The tone was
19 difficult, really for the whole period, but there were
20 people round the table who were -- I'm just -- I'll call
21 it out, it is Minister Long, she's trying to suggest
22 compromises, she's suggesting adjournments so that they
23 can just go back and get back to that point of trying to
24 reach a compromise. And various ideas were coming
25 forward at the meeting. Officials behind the scenes

80

1 were thinking: what do we do, what advice can we put in?
 2 But yes it was incredibly difficult.
 3 **Q.** And the use of a cross-community vote, I don't think
 4 we've yet had an explanation as to what that is, but
 5 I think -- and again I may get this wrong and you must
 6 tell me if I do, but effectively it's part of -- it's
 7 a constitutional protection that exists as part of the
 8 overall arrangements, and I think it's right that three
 9 ministers can ask --
 10 **A.** Yes.
 11 **Q.** -- for it?
 12 **A.** Yes.
 13 **Q.** And it effectively acts as a veto on a decision and it's
 14 intended to operate for the benefit of minorities in
 15 Northern Ireland; is that correct?
 16 **A.** Yes, that is correct.
 17 **Q.** And was it ever intended that it should be used in this
 18 sort of arena, in a public health arena?
 19 **A.** I doubt if it was envisaged that that's what, how it
 20 would be used, when it was designed. But as a civil
 21 servant I've got to be very careful at this point.
 22 **Q.** Yes.
 23 **A.** Forgive me. I think it's fair to ask: was the correct
 24 procedure followed? I can't get into: was this a good
 25 use of a cross-community vote? Because that's

81

1 **LADY HALLETT:** I think we'll leave it there. I think
 2 I understand Ms Pearson's position, Ms Dobbin. You're
 3 still a serving civil servant, I think?
 4 **A.** Yes. Yes.
 5 **MS DOBBIN:** Thank you, Ms Pearson.
 6 Anyway, but I think it's -- and I know that the
 7 Chair has heard about this and also has heard about this
 8 from Sir David, and we can see this in the evidence
 9 I think from some of the ministers -- but it's also
 10 right, I think, that there was leaking and tweeting of
 11 what was going on at this meeting whilst it was
 12 happening as well?
 13 **A.** That's correct.
 14 **Q.** So notwithstanding it was hugely sensitive, on any view,
 15 and difficult, it was being broadcast to people outside
 16 the Executive?
 17 **A.** Yes, and not -- that wasn't the first occasion.
 18 **Q.** Yes.
 19 **A.** Yep.
 20 **Q.** I think, in fact, the evidence has been that it's almost
 21 a constant feature of Executive Committee meetings that
 22 there was leaking around them?
 23 **A.** Regular rather than constant.
 24 **Q.** Yes. And I think to be clear about it, it's not just
 25 the leaking of when a meeting would take place, I think

83

1 a political decision, I cannot speak on that, criticise
 2 that in any way. I'm sorry, I am just putting that out
 3 there.
 4 **Q.** Well, let me put it to you this way: the measures that
 5 were being proposed were health measures?
 6 **A.** Correct.
 7 **Q.** And they were health measures that were being proposed
 8 in respect of the entire community in
 9 Northern Ireland --
 10 **A.** Correct.
 11 **Q.** -- regardless of their background?
 12 **A.** Correct.
 13 **Q.** And they were being proposed by a Unionist minister?
 14 **A.** Also correct.
 15 **Q.** And the vote was being invoked by other Unionist
 16 politicians --
 17 **A.** Yes.
 18 **Q.** -- in order to defeat the measure that was being
 19 proposed by another Unionist; yes?
 20 **A.** Yes.
 21 **Q.** It's quite hard to understand where the protection of
 22 minority interests comes into it within that context; do
 23 you agree?
 24 **A.** I think you'd have to put that to the people proposing
 25 the vote, if I may. Sorry, my Lady.

82

1 we see evidence of leaking of what was actually going on
 2 in the meetings whilst they were taking place?
 3 **A.** Yes.
 4 **Q.** Again, I think it's understood that you're a serving
 5 civil servant, but, just by way of a general
 6 observation, it must be very damaging to decision-making
 7 if the people round the table can't be assured that they
 8 can speak candidly and openly without fearing that it's
 9 going to be provided to journalists at much the same
 10 time as they're saying it?
 11 **A.** That has to be right, yes.
 12 **Q.** I think you've set out in your statement some of the
 13 other challenges, if I may put it in that way, that were
 14 posed to the Executive Committee in its decision-making.
 15 You've also -- and this is at paragraph 237 of your
 16 statement -- said that, in addition to leaking, there
 17 was also public briefing and commentary, contrary to
 18 collective decision-making, and I think we'll see some
 19 examples of this when ministers give evidence, but just
 20 again I think, generally speaking, that was also
 21 correct, wasn't it, that certain ministers at points did
 22 come out in public and make statements that were
 23 contrary to the positions that had been agreed?
 24 **A.** They came out and aired the views that they'd expressed
 25 in discussion. And I'm not going to say every single

84

1 one of them did it --

2 **Q.** No.

3 **A.** -- but it wasn't just one or two.

4 **Q.** And I think the other point that you make, which is

5 a point made by other witnesses as well, is that those

6 ministers who weren't from the main parties, and this

7 would apply particularly to Ministers Long and Mallon --

8 **A.** Yes.

9 **Q.** -- and I think unclear as regards Minister Swann, but

10 certainly as regards the two of them, that they would

11 often receive papers very late in the day or be less

12 involved, I think, perhaps, in the decision-making?

13 **A.** Yeah, I think Sir David dealt with that as well, and ...

14 They found it difficult to arrive at a meeting with

15 late papers, and Minister Long in particular would

16 regularly ask for that to be recorded in the minutes,

17 and sometimes she would ask for a short adjournment just

18 so she could properly read herself in.

19 I actually noticed when you put up a document for

20 Jenny Pyper yesterday -- it was a note of, I think, her

21 first meeting with FM and dFM, in December 2020 --

22 there's a reference in that to -- it was either

23 Minister Long or DoJ, "late papers", something like

24 that.

25 **Q.** Yes.

85

1 enforcement --

2 **A.** Yes.

3 **Q.** -- and specifically the use of PSNI in order to enforce

4 the Covid regulations. And I think if I can do this

5 without going to the documents --

6 **A.** Yeah.

7 **Q.** -- but if I do, I will. There are certainly references,

8 particularly in the autumn of 2020, of perhaps concerns

9 about whether or not police were enforcing the

10 regulations as robustly as they could have been.

11 I know that there's another side to that, but I just

12 wanted to ask you, first of all, if that's correct, if

13 you were conscious of concerns that the regulations

14 weren't being --

15 **A.** Yes.

16 **Q.** -- enforced by the police --

17 **A.** Very much so, that's correct.

18 **Q.** Was that -- was there actually a basis for thinking that

19 that was correct, that the police were not being as

20 involved or as proactive in enforcement as they might

21 have been?

22 **A.** I think it depends on your starting point, really. If

23 you think -- if your starting point is that enforcement

24 has a massive role to play here and it's doable and it

25 will have an impact, but that ... I come from a justice

87

1 **A.** And that was them recognising -- it wasn't DoJ

2 submitting late papers, that was them recognising that

3 Minister Long had a concern about that. As did

4 Minister Mallon.

5 **Q.** Again, I think it was a question perhaps the Chair had

6 asked, whether or not the late provision of paper was

7 also because of fears about leaking as well, so that

8 they were given out as late as they possibly could be;

9 is that --

10 **A.** I think possibly, up to a point, but late papers were

11 a feature, my Lady, of the speed at which we were also

12 working. I was guilty of sending in late papers to my

13 ministers for their consideration, so I understand the

14 dynamic around that, if you're dealing with something at

15 pace. But it was of particular concern to Minister Long

16 and Minister Mallon, because they would not have been

17 part of the process that got to the point of issuing the

18 papers for collective consideration.

19 **Q.** All right.

20 I want to move on to ask you about two topics,

21 because I'm conscious that there are topics we haven't

22 had a chance to ask other people about and it might be

23 that you might well be the person who had some

24 involvement with it.

25 I think the first one is the question of

86

1 background, so maybe I'm bringing a personal view to

2 this. The phrase that we were hearing at the time, and

3 I'm sorry, this might sound a bit callous, but "you

4 cannot arrest your way out of a pandemic". You can't.

5 So that's a phrase that was out and about there.

6 The police had a very, very clear strategy, they

7 called it the four Es, and they would only go to

8 enforcement when they felt that the other three Es had

9 been exhausted and weren't working.

10 **Q.** Now, I can remember one E is explain, I may be in

11 difficulties in remembering what the other Es are. Can

12 you remember?

13 **A.** I might be in difficulty as well. Explain, encourage,

14 there's another one, and then enforce.

15 **Q.** But I think the idea of that strategy was there would be

16 a number of steps before you would go to the ultimate

17 step of actually enforcing --

18 **A.** Correct.

19 **Q.** -- for example arresting someone or issuing a fine --

20 **A.** Yes.

21 **Q.** -- is that right?

22 The specific concern that seemed to exist in

23 autumn 2020 was that there was actually quite a lot of

24 social activity going on. There's lots and lots of

25 references to house parties taking place.

88

1 A. Yes, yes.

2 Q. And also to the concern that bars, I think in
3 particular, were not abiding by the regulations. So
4 again, just to be clear about that, was there also
5 a concern, then, that there were very specific
6 circumstances or -- that the police could have been
7 pressing enforcement and a question mark over whether or
8 not that in fact was happening in the autumn?

9 A. Yes, I think that's right. House parties -- some bars,
10 to be fair.

11 Q. I don't want to say it's every bar.

12 A. I think the hospitality sector representatives went to
13 great lengths to try and make sure they were living
14 within the regulations, but you will always have
15 somebody that's going to go and do something contrary to
16 what you want them to do.

17 I think that where you've got a big social
18 gathering, where you've got a business premises that's
19 not complying with the law, that's where I would
20 understand the concerns about enforcement, because
21 enforcement has to be effective, and, here, policing
22 with the community has been so hard won that the police
23 have to be in charge of their policing strategy because
24 they know best what's going to work there.

25 But yes, there were concerns about some premises and
89

1 space, which would be fundamentally a wrong thing to do.
2 It's absolutely fine to express concerns, have the
3 dialogue, and the junior ministers would be sitting with
4 ACC Todd and talking about it, with Robin Swann present,
5 all views expressed, but ultimately enforcement
6 decisions can only sit with the police.

7 Q. I think we understand that, but, just coming back to the
8 view within the TEO, I think it -- and again, if this
9 isn't correct -- but there certainly was the concern on
10 the part of ministers, particularly in the autumn, and
11 I think on the part of, perhaps, the CMO as well --

12 A. Yes.

13 Q. -- that there needed to be more robust enforcement?

14 A. Yes.

15 Q. That there was actually a requirement for it?

16 A. Yes.

17 Q. Have I -- I don't want to get that wrong.

18 A. There were some views to the extent that the --
19 an enforcement group was set up so that that discussion
20 could be had, yeah.

21 Q. Yes, I was going to ask about that. Is that in fact the
22 correct position, that the enforcement group was set up
23 because of concerns --

24 A. Yes.

25 Q. -- that policing wasn't as robust as it --
91

1 I believe some action was taken in and around that.

2 But if your starting point is that heavy enforcement
3 is going to get us through this, I could not agree with
4 that at all.

5 Q. I think maybe the point that the Chair may be interested
6 in though is maybe just the differences in
7 Northern Ireland and the point that you make about
8 community support being very hard won. And I suppose
9 the very specific question is, then, whether or not that
10 did -- whether that did impact the willingness of the
11 police to enforce, or whether or not there was
12 a different approach taken in Northern Ireland because
13 there was the concern that that support might be
14 compromised?

15 A. I think it would have been a factor. And I'm sure
16 ACC Todd will help you.

17 Q. Yes.

18 A. I think that would have been a factor, but they had
19 a clear strategy, and enforcement is a heavy thing to
20 do, and where they felt that the other three Es could
21 work and would work, then they needed to be left to
22 devise their strategy on that. That's -- that's just
23 operational policing. And there has to be a line
24 between what people might think is right and stepping
25 over that boundary into the operational decision-making
90

1 A. Yes.

2 Q. -- might have been?

3 A. Yes. And it wasn't the only available enforcement
4 route, local councils, environmental health officers,
5 there were other ways to do enforcement as well. And
6 I think the enforcement group really had to look across
7 those and not look solely to the police.

8 Q. The final topic that I want to --

9 **LADY HALLETT:** Just before you move on, just to assure
10 Mr Phillips from the National Police Chiefs' Council
11 that I do listen, I think it's engage, explain,
12 encourage, enforce.

13 **MS DOBBIN:** Good. I'm sure that won't be forgotten.

14 **LADY HALLETT:** Because I've heard it in other modules, I'm
15 not showing off.

16 **MS DOBBIN:** I'm less familiar with it.

17 The last topic is obviously an incredibly important
18 one that you've dealt with in your statement, and it's
19 the question about the identification of equality
20 considerations --

21 A. Yes.

22 Q. -- within civil contingencies.

23 Perhaps broader than that, if I may, because it
24 doesn't necessarily fit within a strict equalities
25 framework, but the identification of those people in
92

1 society for whom either the pandemic might have
2 a disproportionate impact or the effect of restrictions
3 might have a disproportionate impact. And I think that
4 you've said in your statement, and this is at
5 paragraph 340 if you need it, that you didn't think that
6 adequate consideration had been given to equality
7 considerations during the response, and that ultimately
8 that was a question of time pressures more than anything
9 else.

10 You do -- and I will take you to this in a moment,
11 you do refer to the fact that there was some
12 consultation with groups including, for example,
13 Disability Action in Northern Ireland, but can I please
14 ask you about your overarching observation that there
15 wasn't significant consideration.
16 **A.** I just think that's factually correct, but I would
17 associate myself with what Jenny Pyper said about it
18 yesterday: we could have done more, we should have done
19 more, should have found a way to make time. And
20 I really liked her idea yesterday that having
21 an inequalities workstream within the ECT might be
22 a model should we ever have to go there again.

23 I think we're trying to do more in the civil
24 contingencies space and I would love to have the
25 opportunity of talking to some equality groups in
93

1 the way we dealt with the pandemic. Each department
2 I think would have been taking the steps that fell to
3 them, but I just completely agree with Jenny that
4 a workstream within the taskforce would have been the
5 way to go.

6 We're doing some steps at the moment in how we're
7 developing our civil contingencies risk register, that
8 does almost force a consideration of vulnerability in
9 section 75, so I think we can make some improvements for
10 the future, but that's the sort of thing I would like to
11 talk to the equality groups around: how does that work?
12 Does that capture your concerns? Is this going to make
13 it better?

14 So we have to be open to that criticism.

15 **Q.** Sorry, I didn't mean to cut across you.

16 **A.** No, no.

17 **Q.** If we were to take a really obvious group, and again I'm
18 conscious of using the term "disability" as though
19 that's -- that, again, covers a huge array of people in
20 different circumstances, but, again, given how obvious
21 it was that there would be people within the
22 Northern Irish community who were disabled and who would
23 be profoundly affected by lockdowns, that doesn't take
24 much imagination or forethought, and nor does it
25 necessarily -- well, you're a planner, so again you may
95

1 Northern Ireland about that, after the Inquiry
2 of course. But yes, that's all I can say. I'm not
3 going to try and explain it away.

4 **Q.** Could I ask you, though, what you judge now, at this
5 distance, were in fact the equality considerations which
6 ought to have been given much more focus at the time?

7 **A.** Twofold. Vulnerable people as a -- I don't know what to
8 say, not a group, because it's so --

9 **Q.** Yes.

10 **A.** -- vast. Vulnerable people and then section 75
11 categories.

12 **Q.** In terms of just -- I mean, vulnerability covers
13 obviously a --

14 **A.** Yes.

15 **Q.** -- huge range of people in society. I mean, that
16 encompasses poverty, child protection, elderly people.
17 That's almost every possible group of people. So do you
18 accept, then, that really as regards almost all of those
19 groups of people in society to whom extra consideration
20 needed to be given as part of the planning, that
21 effectively Northern Ireland fell short at all stages?

22 **A.** It fell short. I wouldn't want to suggest that
23 absolutely nothing was done and there was no
24 consideration, but I think what Jenny was saying
25 yesterday is you can't point to a structure for it in
94

1 disagree, but it mightn't be thought that it takes that
2 much to think about what the vulnerabilities are, and
3 what could be done to help people who might be
4 imprisoned in their homes, I think is a term that's been
5 used, because of disability, or who can't access
6 services?

7 **A.** I can only agree. I think that the best thing to do is
8 to accept that we could have done more and to make sure
9 if we have to do this ever again that we will do more.

10 I think that there would have been considerations
11 about various aspects -- if we stick on disability,
12 there would have been considerations of various aspects,
13 but what we didn't have was an ongoing dialogue with
14 representatives of the sector to say: what's happening?
15 Tell us what's happening out there, give us some advice.
16 It would have been aspects of disability, aspects of
17 different groups, and I think that's where we can make
18 massive improvements.

19 **Q.** If we come full circle, it is, though -- it's a failure
20 of planning, isn't it, that in the lead-up, in the
21 months leading up to March, when it was known that there
22 would be a pandemic, that that time wasn't used to think
23 about the impact that there would almost inevitably be
24 on a number of different vulnerable people in society?

25 **A.** It should have been done.
96

1 **LADY HALLETT:** Just before we have any questions from
 2 Ms Campbell, it's not quite the same point as equality
 3 considerations, but were you present at meetings when
 4 closure of schools was discussed by the politicians?
 5 **A.** I don't think I was, my Lady, I don't think I was.
 6 **LADY HALLETT:** So would you know what considerations were
 7 taken into account? I mean, I've heard a number of
 8 evidence around the United Kingdom -- a number of pieces
 9 of evidence about closure of schools, and although
 10 politicians seem to have taken into account obviously
 11 the fact that children wouldn't get their formal
 12 education, and that it might cause problems for
 13 key workers who would have children at school, I don't
 14 seem to have heard a lot about politicians talking about
 15 the lack of social development. Do you know if that was
 16 a factor in the decision to close schools?
 17 **A.** I wouldn't know, but I think it was discussed at the
 18 Executive after, I think so, I'd have to double check.
 19 **LADY HALLETT:** So, what, after the first closure of schools?
 20 **A.** Yes.
 21 **LADY HALLETT:** In other words, when the first closure takes
 22 place, all anyone is thinking about is just stop
 23 transmission.
 24 **A.** Yes.
 25 **LADY HALLETT:** And it's only afterwards that people start

97

1 Just to put this in context, we can see that it's
 2 sent on Thursday 26 March at one minute past 9 at night.
 3 **A.** Yes.
 4 **Q.** Now, the issue that Sir David raises, having been
 5 expressed both by the First Minister and deputy First
 6 Minister, albeit in slightly more nuanced or different
 7 terms, is really the issue of how we get Executive level
 8 collective decision-making in relation to the pandemic.
 9 Thinking back to the work that you did on 17 March,
 10 we know it was St Patrick's Day, it was a Bank Holiday
 11 and you had just been, if you like, co-opted over the
 12 course of that weekend, and here you are on a Tuesday
 13 writing your draft plan, and one of the things that you
 14 include in your draft plan -- and you discussed it this
 15 morning with Ms Dobbin and I won't put it back up unless
 16 you need me to -- is that the issue of Cabinet
 17 collective decision-making was so fundamental it was
 18 stating the obvious, and those were really your words to
 19 the Chair in evidence this morning.
 20 I see you nodding, but I think you agree that that
 21 issue was so obvious and fundamental to you at that
 22 stage?
 23 **A.** The need for political decision-making and compromise,
 24 yes, if what's that you mean, yes.
 25 **Q.** Exactly, but also the need for political decision-making

99

1 thinking, "Oh, this could have an even greater impact on
 2 people than we thought?"
 3 **A.** Yes. It's just a recollection, but I think social
 4 development was discussed, and I would be fairly
 5 confident that the Chief Medical Officer raised it on at
 6 least one occasion, I think --
 7 **LADY HALLETT:** Thank you. You may be the wrong person to
 8 ask, I'm sorry, it's just one of the things I wanted to
 9 explore with someone.
 10 Ms Campbell.
 11 **Questions from MS CAMPBELL KC**
 12 **MS CAMPBELL:** Thank you, my Lady.
 13 Ms Pearson, my name is Brenda Campbell and I ask
 14 questions on behalf of the Northern Irish Covid
 15 Bereaved.
 16 I want to revisit, if we may, the email exchange
 17 between yourself, Sir David and Hugh Widdis.
 18 It's at INQ000287536.
 19 Now, you've already been asked a great deal of
 20 questions about this, and I'm grateful both to Ms Dobbin
 21 and to yourself for dealing with it comprehensively, but
 22 if I might approach it from a slightly different angle.
 23 Could we go to page 3 -- sorry, yes, page 2, in
 24 fact, where we see the beginning of the email from
 25 Sir David.

98

1 and compromise really at the Executive level, including
 2 the First Minister and the deputy First Minister, as
 3 joint leaders.
 4 **A.** Correct.
 5 **Q.** Yes. That's really why you included it in your draft
 6 plan on the 17th, and why it went in that form almost
 7 entirely unaltered, if not entirely unaltered, to the
 8 board two days later?
 9 **A.** Correct.
 10 **Q.** Now, here we are a week on from that having been
 11 presented, and in fact your email comes on the 27th, so
 12 ten days on from you drafting your plan on 17 March, and
 13 Sir David is saying "the First Minister and the deputy
 14 First Minister have raised this with me as a problem".
 15 And if we look at the bottom of -- where he signs
 16 off, he's struggling to answer the simple question: how
 17 can we get control of this, at an Executive level? And
 18 he proposes it from his perspective, he's going to have
 19 a sleep on it.
 20 Do you see that?
 21 **A.** I do.
 22 **Q.** Now, if we then go to your reply, which is on page 1,
 23 and you point out the things that are in place, stemming
 24 from the work that you started on 17 March. And "What's
 25 not working?", we've got the first two: a fresh and, to

100

1 some level, inexperienced ministerial team, because of
2 the Assembly being just back.

3 But then what we have is this crisis that's out of
4 control and, you say, "scaring them", and we know that
5 you wouldn't necessarily use that word now, departments
6 are doing things that are taking them by surprise, they
7 haven't moved into confidence mode, they're not seeing
8 the big picture.

9 Would it be fair to say that in part a contribution
10 to these things that are not working was a failure to
11 think considerably further in advance, of how collective
12 decision-making was going to work? As you say, it's so
13 fundamental that it's stating the obvious?

14 **A.** I think that I can only say that this is arising from
15 the issue around education, and that David said, and
16 I would agree, that things got significantly better
17 after this. So that's the context for why I wrote that.

18 Collective decision-making is a feature of the
19 Executive, so I don't think any pre-planning around
20 that -- I'm not really sure what could have been done
21 around how the Executive works. Sorry, is that what
22 you're asking me?

23 **Q.** It is, yes. And putting aside the issue of education,
24 and obviously accepting that it was a contributing
25 factor at this point, we're here on 27 March --

101

1 **A.** -- context-specific, and whatever solutions we offer
2 need to address these things, so what else can we do to
3 help them coalesce. But I come back to the fact that
4 we've got a framework in front of them, that's the main
5 cohesive point, and "What's not working?" in this note
6 is around the specific issues that led to the -- led to
7 the issues around education.

8 But David's also recognising here that they've got
9 a concern about information coming from health. That's
10 easily fixed, if they want to get into that space, by
11 specific requests to the health minister.

12 So I'm not sure that you can pre-plan for Executive
13 decision-making because it is what it is.

14 **Q.** Well, to some extent your draft document was doing just
15 that, wasn't it?

16 **A.** Yes. Yes. Yes.

17 **Q.** And indeed, knowing the date of your draft document and
18 knowing the date then of the lockdown and what followed
19 very quickly thereafter, is it a fair observation to say
20 that there was very little time to absorb your draft
21 document, that became the plan, before the lockdown was
22 announced?

23 **A.** That's fair.

24 **MS CAMPBELL:** Thank you.

25 **LADY HALLETT:** Thank you very much, Ms Campbell.

103

1 **A.** Yes.

2 **Q.** -- and we're in lockdown --

3 **A.** Yes.

4 **Q.** -- and that lockdown in fact hadn't been announced when
5 you were writing your draft ten days before, but here
6 you are at a point of lockdown, in the eye of the storm,
7 trying to figure out a way, with Mr Widdis' suggestions,
8 radical and perhaps less so, about how you get -- how
9 you meet the concerns of our joint leaders as to how
10 they're going to contribute to the pandemic response.

11 **A.** Yes.

12 **Q.** And would you accept that trying to find a solution --
13 as you say, whatever solutions you come up with, trying
14 to find a solution at that time, at that moment of
15 crisis, was always going to be more difficult than
16 finding a solution in advance and before the crisis hit?

17 **A.** So I think my email here, if I may, is doing two things.
18 I'm referring to the fact that we've already got some
19 steps in place with the priorities in the framework --

20 **Q.** Yes.

21 **A.** -- to help them coalesce around an agreed series of
22 things. The "What's not working?" section is trying to
23 diagnose why that particular issue had been so
24 problematic --

25 **Q.** Yes.

102

1 Those, I think, are all the questions we have for
2 you, Ms Pearson. Thank you very much indeed for your
3 help. You're now free to go.

4 **THE WITNESS:** Thank you.

5 **(The witness withdrew)**

6 **LADY HALLETT:** Very well. 1.45, please.

7 **(12.47 pm)**

8 **(The short adjournment)**

9 **(1.45 pm)**

10 **(Proceedings delayed)**

11 **(1.50 pm)**

12 **MS DOBBIN:** My Lady, can I apologise for having kept you
13 waiting, it was a document issue rather than a lunch
14 issue.

15 **LADY HALLETT:** Thank you.

16 **MS DOBBIN:** Sorry, yes, the witness, please, thank you.

17 **MS JAYNE BRADY (sworn)**

18 **Questions from LEAD COUNSEL TO THE INQUIRY for MODULE 2C**

19 **MS DOBBIN:** Can I ask you to give your full name to
20 the Inquiry, please.

21 **A.** Jayne Brady.

22 **Q.** I think it's right, Ms Brady, that you've made three
23 witness statements for the Inquiry, and I think you've
24 got all three of them in front of you. I think the
25 first one -- which you made on behalf of the

104

1 Executive Office, is that right?

2 **A.** Yes.

3 **Q.** Ought to be in front of you. Let me just check which

4 date that is. Do you have the date in front of you?

5 Forgive me.

6 **A.** 23/02.

7 **Q.** Thank you. Can you confirm that the contents of that

8 statement are true to the best of your knowledge and

9 belief?

10 **A.** I can.

11 **Q.** Then you made two statements subsequent to that, so the

12 first one, I think, is 21 March 2024?

13 **A.** Yes.

14 **Q.** And, again, are you content that that statement is true

15 to the best of your knowledge and belief?

16 **A.** I am, yes.

17 **Q.** Then you made a third statement, on 25 March 2024.

18 **A.** Yes.

19 **Q.** Do you have that in front of you?

20 **A.** I do.

21 **Q.** You do. Can you confirm that the contents of that

22 statement are true to the best of your knowledge and

23 belief as well?

24 **A.** I can, yes.

25 **Q.** The Inquiry's grateful to you for having made all of

105

1 2020 and 2021?

2 **A.** That's correct.

3 **Q.** All right.

4 Just asking first of all about your role as head of

5 Civil Service, I think in fact your role is somewhat

6 different, is that right, to the role that Sir David had

7 whenever he was the head of the Civil Service?

8 **A.** That's correct, I think that's been referenced a number

9 of times through the Inquiry. My role as head of the

10 Northern Ireland Civil Service is different from those

11 in the permanent secretaries in Scotland and in Wales

12 and, indeed, in Whitehall. Whilst I am the head of the

13 Civil Service, I am not the accounting officer, so I do

14 not have the power to direct permanent secretaries, who

15 are the heads of their division in terms of accounting

16 officer provision.

17 There are nine different legal entities, my Lady, in

18 Northern Ireland, and those each -- are each under the

19 direction and control of their minister, and obviously

20 we have, it's been well versed, a mandatory coalition.

21 There's perhaps a couple of other aspects I might

22 reflect on which wasn't covered, the power to direct

23 wasn't covered, but there are other elements that are

24 different from the Whitehall model in that --

25 **Q.** I'm just going to stop you, because you've gone a bit

107

1 those statements. I know you'll be aware that two of

2 them in particular touch on the issue of informal

3 communications, and I'm going to ask you some questions

4 about that today.

5 If I can start by asking a little bit, first of all,

6 about your role. It's right that you're the head of the

7 Civil Service in Northern Ireland; correct?

8 **A.** I am, yes.

9 **Q.** And that you took up that role on 1 September 2021?

10 **A.** That's correct.

11 **Q.** And I think that before that you had a background in --

12 well, you had a varied background, but you're

13 an engineer by profession and training; is that correct?

14 **A.** That's correct, I am.

15 **Q.** Then you had a number of roles in the private sector?

16 **A.** Yes, that's correct.

17 **Q.** And I think that, as part of your background, you also

18 had a professional background as part of being advisory

19 groups as well?

20 **A.** I have, yes.

21 **Q.** And in 2020 you were appointed to the UK government's

22 Innovation Expert Group?

23 **A.** I was, yes.

24 **Q.** And that you were also the Digital Innovation

25 Commissioner for Belfast City Council as well between

106

1 ahead of me.

2 **A.** Okay.

3 **Q.** I think what I wanted to check, and forgive me if it

4 wasn't clear enough, I think that the role of head of

5 Civil Service changed when you took up the role.

6 **A.** Okay.

7 **Q.** Is that correct? So Sir David had a slightly different

8 role to you, and I think that what changed was that

9 a permanent secretary was brought in to the Executive

10 Office, thus meaning that your role was -- that you were

11 divested of some of the responsibilities perhaps that

12 Sir David had?

13 **A.** Yes, my apologies.

14 **Q.** I'm sure it was me.

15 **A.** No, yes, that's indeed the case. The permanent

16 secretary before my appointment, Dr Denis McMahon, was

17 appointed in June 2021, just after my appointment was

18 announced, and his role was to be TEO permanent

19 secretary and accounting officer, and I'm aware that he

20 also gave evidence on behalf of TEO at the first stage

21 of the Inquiry process. That was to allow me to focus

22 on the overall departmental responsibility, and indeed

23 looking towards how we can create structures for the

24 transformation of the Northern Ireland Civil Service.

25 **Q.** All right, and just so that we're clear about this in

108

1 terms of chronology, we know that Sir David left his
2 role in and around, I think it was the end of August or
3 the start of September 2020, and there was no permanent
4 replacement then until you took up your role in 2021; is
5 that right?

6 **A.** Yes, during that period Dr Jenny Pyper was appointed as
7 an interim head of the Civil Service, but she wasn't
8 appointed through a normal civil service Commissioners'
9 process, she was provided on a secondment from the
10 strategic investment board through that period and
11 I took over from her interim capacity on
12 1 September 2021.

13 **Q.** It's obviously very conspicuous that, at a point in time
14 when the pandemic had again reached a peak, so in other
15 words at the end of the summer, right through until
16 December, and I know obviously that the rates of
17 transmission and death continued to go up in
18 January 2021, there was in fact no one in post as head
19 of the Civil Service, and I know that you've reflected
20 in your witness statement that you didn't think --
21 forgive me if I'm putting this too broadly -- that that
22 had made a difference. Is that right?

23 **A.** I can't obviously speak for events that were before my
24 time. When I came into the office, the ECT group was in
25 operation and it had got into a rhythm and structure and

109

1 impact that I observed coming into the role for those in
2 our more vulnerable communities, so that was a key part
3 of my mission, is actually how we could actually address
4 those, not just -- and I think the period the Inquiry's
5 looking at is towards the February, but I'm very clear
6 within my role currently now is seeing the outworkings
7 of the impact to those communities and actually the
8 potential scarring in those communities as well, so
9 absolutely that joined up strategic advice is really
10 critically and key, not just in navigating that but also
11 providing the frameworks for that recovery phase.

12 **Q.** I think the issue perhaps that I had more in mind was
13 that we've obviously seen that there was a particularly
14 difficult period in the autumn of 2020 amongst the
15 Executive Committee; would you have expected the head of
16 the Civil Service to have played some sort of role
17 perhaps in trying to find a way through those
18 difficulties or in providing advice to the
19 First Minister and the deputy First Minister as to how
20 to deal perhaps with divisions that may have developed
21 during that period of time?

22 **A.** And again obviously having not been part of those
23 discussions but if I look towards the role that I took
24 in terms of September and moving forward and we did have
25 some of those challenges in terms of Omicron, not just

111

1 in that perspective, we were then looking towards
2 potential opening up. However, it's very obvious that
3 in a period of significant volatility within the world
4 and indeed Northern Ireland, where the structures are
5 perhaps more complex than other constitutions, that
6 having that uncertainty, that discontinuity of course
7 must have had an impact in terms of that view. My
8 observation having come in that there were structures in
9 place to deal with that which worked effectively well,
10 but I would acknowledge that not having the implements
11 to build it would not be the ideal conditions of heading
12 into something of this magnitude and challenge.

13 **Q.** One of the roles obviously of the head of Civil Service
14 was to act as an adviser to the First Minister and the
15 deputy First Minister. So again just coming back to
16 that period, it might be thought surprising or even
17 alarming that during that specific period from September
18 onwards that there wasn't actually anyone in that role
19 to provide that sort of advice and guidance to the
20 First Minister and deputy First Minister.

21 **A.** I mean, for reference, I wasn't there in my role, but
22 of course the aspects of advice are critically
23 important. In my view, when I took up the role I was
24 very clear that my view was how we then find a way
25 through this, but I was very marked by the significant

110

1 the chief policy adviser to the First Minister and
2 deputy First Minister, also secretary to the Executive,
3 and also have a role as leader of the programme through
4 government, so part of the aspects of advice was, as we
5 went into Omicron, is how can we find a solution
6 regarding navigating this way out which does require
7 engagement with all different parties as secretary to
8 the Executive, so I would have expected that they would
9 have a role, yes.

10 **Q.** So sort of wise counsel --

11 **A.** Yes.

12 **Q.** -- in trying to keep people, as it were, I suppose,
13 trying to keep the decision-making on a -- keeping it
14 functioning rather than descending perhaps into real
15 tension or difficulty?

16 **A.** Yes. Yes, I think in my statement I've made a reference
17 to the emerging issues with Omicron and --

18 **Q.** Yes.

19 **A.** -- the discussions that were had, and I guess
20 an awareness that there were going to be more
21 restrictions imposed and to find ways to navigate
22 through that and working with the ministers to try and
23 have a briefing and provide frameworks and environments
24 where that engagement in advance of an Executive could
25 be made aware so that the Executive meetings could be as

112

1 effective as possible, and also to allow ministers to
2 have the optimum level of time to consider those options
3 given the magnitude of the decisions that they were
4 making.

5 **Q.** I could tell there was frantic activity going on beside
6 me, I'm being asked if you could perhaps speak more
7 slowly.

8 **A.** Okay. Northern Irish, apologies, my Lady.

9 **LADY HALLETT:** Not at all Irish, I'm afraid, I'm English.

10 **MS DOBBIN:** Thank you.

11 If we could move on, then, if we may, just to then
12 ask you then about what happened in terms of the TEO's
13 response to the Inquiry and indeed the
14 cross-departmental response to the Inquiry.

15 I hope I can do this without having to take you
16 through all of the documentation, but if at any time you
17 want to see any of it, please stop me --

18 **A.** Okay.

19 **Q.** -- and I will, I'm just going to refer to some of the
20 correspondence and --

21 **A.** Okay.

22 **Q.** -- if you agree with me.

23 When the Inquiry was announced, I think it's right
24 that on 10 June 2021 the Cabinet Office, through
25 a Mr Tierney, wrote to all permanent secretaries asking

113

1 his experience of taking part in a public inquiry and
2 the minute level of detail that was required in order to
3 respond; is that right?

4 **A.** That's correct, yes, I've seen that correspondence.

5 **Q.** And in particular he mentioned about the fact that
6 communications would be required by any public
7 inquiry --

8 **A.** That's correct, yes.

9 **Q.** -- and specifically drawing his colleagues' attention to
10 that?

11 **A.** Yes.

12 **Q.** I think that when you came into office, then, on
13 16 September 2021, you also then communicated across
14 government in Northern Ireland and provided guidance on
15 the Inquiry and what might be required as well; is that
16 right?

17 **A.** That's correct, yes, I did.

18 **Q.** And I think in fact we can probably go to that guidance
19 just to make it clear -- there it goes, it's there --
20 and we can see, I think, if we go, please, to
21 paragraph 6 of the -- sorry, page 6 of the guidance, we
22 can see that the guidance set out -- now, first of all,
23 I should say this was published by the Departmental
24 Solicitor's Office; is that right?

25 **A.** That's correct, yes.

115

1 that government departments take steps to ensure that
2 their department was ready to meet the requirements of
3 the Inquiry, and to ensure that relevant records were
4 available.

5 I think, I'm sure that you will have seen this
6 correspondence in preparation.

7 And that also included, didn't it, ensuring that no
8 materials of potential relevance were destroyed?

9 **A.** That's correct.

10 **Q.** I know that you weren't quite in post then, but we
11 understand, and we've seen the communication that was
12 sent internally by Ms Pyper on 14 June 2021 -- I think
13 you've seen that as well --

14 **A.** I have seen that as well, yes, I am aware.

15 **Q.** And she forwarded that letter, didn't she, to all
16 permanent secretaries within Northern Ireland?

17 **A.** She did, yeah.

18 **Q.** Drawing their attention to it. And she said in her
19 covering email that that applied just as equally,
20 I think, to the Northern Ireland Civil Service as
21 well --

22 **A.** That's correct.

23 **Q.** We know then, and we've already had -- a witness,
24 Mr Stewart, has already been taken to this, but again,
25 I think you're familiar with it, that he reflected on

114

1 **Q.** So it was formal legal guidance that had been produced
2 within government, and had that been provided or was it
3 provided to each government department?

4 **A.** Yes, I took up post on the 1st and had discussions with
5 the special advisers to First Minister and deputy First
6 Minister to indicate my intent to do that, so my first
7 week in office I commissioned this advice and briefed
8 permanent secretaries I would be providing it. And on
9 the 16th that was sent with a covering letter from
10 myself to all permanent secretaries asking them to
11 assure themselves, in the same language that Mr Tierney
12 had. I think I'd also referenced that there was
13 an indication of relevance and that they should take the
14 broadest interpretation of relevance in terms of
15 documentation, given the Inquiry had not yet stated.

16 Further to that, it was also then through -- perhaps
17 areas that we will discuss later -- the Covid Inquiry,
18 the HOCS reference group, which I communicated, training
19 was provided on this to around 580 individuals across
20 the service, and this document was then circulated to
21 around, I think, 74 individuals across eight departments
22 in the Civil Service from a period of June 2022 up until
23 November the following year. So it was a -- not just
24 a one position.

25 I also then provided this document and briefing note

116

1 to the First Minister and to the deputy First Minister
 2 in November, and then I provided --
 3 **Q.** I just want to stop you, because you're going quite fast
 4 and you've moved a bit ahead, so before we go any
 5 further I just wanted to draw your attention to what was
 6 said at the bottom of page 5, and that the document, the
 7 guidance, the legal guidance identified that hard copy
 8 documents would be of potential relevance, but also then
 9 underneath it the guidance foresaw that not just
 10 electronic communications like email would be
 11 potentially relevant but in fact it identified that
 12 informal communications might be relevant as well;
 13 correct?
 14 **A.** Absolutely, yes.
 15 **Q.** You've said that this was drawn to the attention of the
 16 First Minister and the deputy First Minister; was that
 17 by you?
 18 **A.** Yes, it was. I provided, I think it's provided to
 19 the Inquiry, a covering letter to appraise them of the
 20 situation regarding the Inquiry. Obviously at that
 21 point Scotland had made an indication that they were
 22 going to perform their own inquiry, so I was providing
 23 advice as to the structures that we needed to put in
 24 place to give assurance to meet the UK Inquiry's issues,
 25 the areas that had been identified, supporting RHI, and

117

1 **Q.** So that's what I was going to ask you, so that's the
 2 part of the legal guidance that had been set out, was to
 3 ensure that there were proper processes within the
 4 departments in order to ensure that ministers and their
 5 private offices were aware as well; yes?
 6 **A.** Yes. And indeed also then to contact -- to make sure
 7 that the departmentals' information management and
 8 IT teams and security officers were aware, so that if
 9 there was any difference to destruction of documents
 10 that those could be considered as well.
 11 **Q.** Right. So that was sent, and sent to the -- we know, to
 12 the deputy First Minister and the First Minister as
 13 well, and I think in fact there was also a separate
 14 submission to them as well in and around this time also.
 15 Maybe we could just bring that up, and that's
 16 INQ000409671, and if we could go to paragraph 18 of
 17 that, please.
 18 So, again, the briefing paper to them, I think,
 19 again expressly dealt with the issue of communications;
 20 correct?
 21 **A.** Yes.
 22 **Q.** And again reference there, that happens to be
 23 particularly about emails, but I think, again, flagging
 24 up the importance of ensuring that material was kept for
 25 the purposes of the Inquiry; is that right?

119

1 then I also provided this as an attachment to that for
 2 them, for information at that prospective, yes.
 3 **Q.** Obviously you are -- in your role as head of the Civil
 4 Service, you act as adviser to them, and it was one of
 5 the questions I was going to ask: did the responsibility
 6 then for informing them about their obligations to
 7 the Inquiry, did that fall to you or would that have
 8 fallen to someone else within the TEO or within their
 9 private office perhaps?
 10 **A.** That would fall, in terms of their governance, to their
 11 accounting officer, who has information governance
 12 responsibilities. That would have been the permanent
 13 secretaries in each of the departments. And that was
 14 why the request was to assure themselves.
 15 I think if you go to just possibly the -- the -- so
 16 the assurance was set, just:
 17 "This process should include contacting key
 18 individuals and teams (including Ministers and their
 19 Private Office) within the department and instructing
 20 them to preserve documents and records that may be
 21 relevant to the Inquiry's Terms of Reference."
 22 **Q.** I'm going to stop you, just to be clear in terms of what
 23 you're referring to. So that's just under paragraph 4
 24 and the second paragraph that you're reading from?
 25 **A.** Yes, that's correct.

118

1 **A.** Yes.
 2 **Q.** All right. And I think then subsequent to that there
 3 were -- thank you, that can be taken down -- further
 4 communications then from the Cabinet Office to
 5 government in Northern Ireland as well. There were
 6 further letters, I think, in February and July of 2022
 7 as well, again reiterating the message that material
 8 needed -- material of potential relevance needed to be
 9 retained, and also there needed to be assurance that
 10 material wasn't destroyed as well; correct?
 11 **A.** Yes, that's correct.
 12 **Q.** In fact you circulated the letter that had been sent in
 13 July 2022, again to all Northern Ireland permanent
 14 secretaries; is that right?
 15 **A.** That's correct, yes.
 16 **Q.** And you referred earlier to training. I think going
 17 by -- looking at your statement -- I don't think you
 18 need to turn to this -- at paragraph 18, you said that
 19 there had been virtual training on eight occasions
 20 between 7 June 2022 and 12 June 2023 as well?
 21 **A.** That's correct, yes.
 22 **Q.** Again, the Cabinet Office wrote in October 2022
 23 reiterating again the message not to destroy, and again
 24 you referred in your letter to Northern Ireland
 25 permanent secretaries to the obligation to retain and

120

1 not destroy, and I think you forwarded that letter
 2 again; is that right?
 3 **A.** Yes, and just to note that was the day the ministers
 4 left, the caretaker ministers left Northern Ireland, was
 5 the day I ordered that.
 6 **Q.** Yes, so I think the key point maybe here is that
 7 ministers had been in post -- I know there's
 8 an exception for Baroness Foster, which I'll come to,
 9 but other ministers had obviously received those
 10 communications about the importance of retaining data
 11 and not destroying; correct?
 12 **A.** Yes, that's correct.
 13 **Q.** So just turning then, and I think there's a -- if
 14 I could -- just to ensure I've covered all of your
 15 communications with ministers, I think that there was
 16 also a meeting on 14 June 2022, and it may assist if
 17 I bring that up so that you can see that.
 18 I'm grateful.
 19 This is the email note of the meeting, but I think,
 20 again, we see reference here to informal communications;
 21 is that right?
 22 **A.** Yes. Perhaps by way of context, these were meetings
 23 that I convened after the First Minister and deputy
 24 First Minister had stepped down, and there was no longer
 25 an Executive. So -- however, it was -- it was a period

121

1 **A.** Yes.
 2 **Q.** So, in other words, at a very early stage in this
 3 process, in addition to all of the communications from
 4 Cabinet Office that had been filtered through, there was
 5 that specific request for evidence in relation to
 6 informal communications?
 7 **A.** Yes.
 8 **Q.** Just pausing there, if I may, are you satisfied that in
 9 terms of the communications that had come originally
 10 from Cabinet Office to government in Northern Ireland,
 11 that first of all those communications were accurately
 12 conveyed to permanent secretaries, in other words that
 13 the obligation was made clear to them that they had to
 14 retain material and not destroy material?
 15 **A.** I'm -- I am clear that the advice provided was explicit
 16 and clear. I think, which you haven't drawn attention
 17 to in my correspondence in the letter, I said that
 18 I would provide information to all staff. I considered
 19 that -- that was my first week in post -- and we
 20 provided different vehicles to communicate to all staff
 21 of the implications, and that was regarding the training
 22 and awareness through the oversight framework, the
 23 580 people, that was providing the legal guidance to
 24 those individuals within departments. So, in my view,
 25 the information provided was clear, it was consistent,

123

1 of significant global disruption and I was attending UKG
 2 meetings on behalf of Northern Ireland, so, particularly
 3 with the war in Ukraine, COBR meetings and briefings and
 4 dealing with the refugee and asylum seeker provision.
 5 So I had facilitated regular meetings with the existing
 6 ministers who were still in post in the other eight
 7 departments to make sure I was providing factual
 8 briefings to them on key issues that I thought their
 9 departments should be aware of. So that was the context
 10 of that meeting. I'm not sure that all -- I think
 11 there's -- at the --
 12 **Q.** Yes --
 13 **A.** -- not all ministers were present at that meeting, but
 14 yes, for those who attended.
 15 **Q.** Yes, so the message was reiterated again, and that's
 16 14 June 2022?
 17 **A.** Yes, correct.
 18 **Q.** I think not very long after this it's right that
 19 Module 2C of the Inquiry then sent a Rule 9 letter so
 20 requesting information, and specifically requesting
 21 information from the TEO about the extent to which
 22 informal communication was used within the TEO, and
 23 specifically asking, for example, about WhatsApp
 24 messages and those other types of information. Do you
 25 agree?

122

1 it was supported with infrastructure regarding different
 2 levels of insight and awareness within those
 3 organisations and teams, and it was repeated frequently.
 4 **Q.** And in terms of, obviously this was information that was
 5 provided to permanent secretaries. In terms of the
 6 translation of that information or the provision of that
 7 information to ministers, again were you satisfied that
 8 that information had been conveyed to ministers and the
 9 obligation made clear to them?
 10 **A.** It's clear from -- when I read the Rule 9 statements
 11 that have come from department in terms of the informal
 12 communications, it's not clear to me that in the
 13 transition, when they left office, whether that
 14 information was provided to them. I have no evidence to
 15 show that that was, in terms of it, other than the
 16 communication that I have provided.
 17 **Q.** I'm going to -- I think those are two different things
 18 potentially.
 19 **A.** Okay.
 20 **Q.** So let me try and make that distinction clear. At the
 21 time these communications were being provided to
 22 departments and permanent secretaries about the need to
 23 ensure that material was retained, when you came into
 24 office were you satisfied that that information was also
 25 being conveyed to ministers at the time?

124

- 1 **A.** I ... I asked for assurances from departments in terms
2 of asking them to assure themselves in terms of what was
3 being done. It was my expectation but I do not have
4 confirmation that permanent secretaries advised their
5 ministers of that effect -- to that effect, although it
6 was obviously provided in the guidance through that
7 mechanism.
- 8 **Q.** And that obligation would have fallen on the permanent
9 secretaries?
- 10 **A.** Yes.
- 11 **Q.** That's who --
- 12 **A.** Yes.
- 13 **Q.** -- effectively would have had charge of ensuring that
14 that information was provided?
- 15 **A.** Yes.
- 16 **Q.** I'll put that to one side, because that's a separate
17 issue from, I think, the issue that you're going on to,
18 which was what happened when ministers actually left
19 office and that for some of them their devices were
20 wiped by internal -- the part of NICS that's called
21 IT Assist; correct?
- 22 **A.** That's correct.
- 23 **Q.** Perhaps if we leave that and we'll come to that in the
24 chronology.
- 25 **A.** Okay.

125

- 1 **A.** That's correct, yes.
- 2 **Q.** And then notes the fact that the Inquiry team would need
3 to be advised --
- 4 **A.** Yes.
- 5 **Q.** -- that that had happened; yes?
- 6 **A.** Yes.
- 7 **Q.** I think if we go over the page, please, to page 2, we
8 certainly have the confirmation from Ms Griffith, and
9 I think that's in respect of the First Minister's
10 office; is that right?
- 11 **A.** That's the first -- but that would be, I think it was
12 referring to not -- the First Minister being
13 Baroness Foster and not Paul Givan.
- 14 **Q.** Yes, so this specifically, is that right; so Ms Griffith
15 effectively ran the office --
- 16 **A.** Yes.
- 17 **Q.** -- is that the right way to put it, for Baroness Foster,
18 and she was confirming on 9 May that the devices were
19 all reset some time ago; yes?
- 20 **A.** Yes.
- 21 **Q.** And referring to the fact that that would have been the
22 case when ministers or SpAds left during the mandate, so
23 the same for Baroness Foster, it's because she left
24 during the time when the arrangements were still up and
25 running; is that right?

127

- 1 **Q.** In terms of how the -- this all came to light, and the
2 fact that there had been data loss, I think it's correct
3 that certainly that was understood within TEO in and/or
4 around 9 May 2023?
- 5 **A.** Yes, that was, as I understand, advised to the TEO
6 Inquiry team in May 2023, I was not advised of it until
7 in August of that year.
- 8 **Q.** I'm just going to go, if I may, to the emails about that
9 just so that we can look at those. If we could
10 please -- there you go. The email is there. So if we
11 look, please, at page 3 of that, we can see that this
12 was an email sent on 9 May 2023. INQ000409608.
- 13 It's sent from Ms Hannon, and we can see, I think
14 it's right that Ms Morrow and Ms Griffith were the
15 principal private secretaries --
- 16 **A.** For the First Minister and deputy First Minister.
- 17 **Q.** On 9 May Ms Hannon appears to understand that those
18 devices, and she's referring there to both ministerial
19 and special adviser devices, had been wiped. Yes?
- 20 **A.** Yes, that's correct.
- 21 **Q.** So there doesn't appear to be a question mark, she
22 appears to understand that that has happened; correct?
- 23 **A.** That's correct, yes.
- 24 **Q.** And rather she wants some information about how that had
25 happened; yes?

126

- 1 **A.** Yes, that's correct, however I would note that the
2 First Minister Paul Givan's phone wasn't reset when they
3 left, yes.
- 4 **Q.** Yes, we'll look at some specifics but that's certainly
5 what she's suggesting at this point in time, and I think
6 then the enquiry was also made in respect of the deputy
7 First Minister as well; yes?
- 8 **A.** Yes.
- 9 **Q.** I think if we go up this email chain a little bit,
10 I think we see that on 9 May Ms Griffith is going to
11 confirm whether or not that's the case, on page 1. Yes?
- 12 **A.** Yes.
- 13 **Q.** It was understood on 9 May that Baroness Foster's
14 devices had been wiped and the position wasn't clear at
15 that stage as regards the deputy First Minister; is that
16 right?
- 17 **A.** That's correct, yes.
- 18 **Q.** Then we know that on 11 May there was then a meeting;
19 correct?
- 20 **A.** Yes.
- 21 **Q.** And I think it's fair and right to point out that there
22 is a dispute between people who attended that meeting
23 about precisely what was discussed about the wiping; is
24 that right?
- 25 **A.** That is correct, yes.

128

1 Q. And that may not be something we can resolve here, but
 2 right to mark that --
 3 A. Absolutely, yes.
 4 Q. -- it's not necessarily accepted by all people who
 5 attended precisely what was discussed, but there is
 6 a note about the meeting on 11 May; is that right?
 7 A. That's correct, yes.
 8 Q. In fact, there's a series of minutes about the meeting
 9 of 11 May --
 10 A. That's correct, yes.
 11 Q. If we perhaps look at the first draft of the meeting,
 12 and, yes, so the first draft of the minute that was
 13 produced, so I think if we call this version 1,
 14 reflected that:
 15 "... Former Ministers phones have been wiped as the
 16 phones have been returned to a factory reset position.
 17 Maria is discussing this issue so that we can inform
 18 the Inquiry that all reasonable steps have been taken in
 19 relation to this information."
 20 Yes?
 21 A. Yes.
 22 Q. We know that that note was amended, I think there are
 23 13 different amendments to it, but the final version
 24 that we have of it, and it appears on the right-hand
 25 side of the screen, is the meeting note of the position
 129

1 And then there is a departmental preparedness group
 2 which would be a slightly more junior level within that
 3 but also I guess getting that prepared just and
 4 cross-cutting. Then it would be a departmental -- a TEO
 5 departmental group as well. So this was the structures
 6 put in place to ensure the co-ordination of this, this
 7 would have been one of the groups that worked in terms
 8 of the training and advisory which DSO led on.
 9 Q. Who would these notes have been circulated to outside of
 10 the attendees of the meeting?
 11 A. They -- to my awareness they're not, they're within
 12 those attendees of the meeting.
 13 Q. Would you expect then that these meetings would be
 14 circulated to these individuals and then stored?
 15 A. Yes, I would, yes.
 16 Q. And the final -- the version of the note that we looked
 17 at, the abbreviated reference to phones, that's what
 18 would constitute the formal record of the meeting and
 19 would be the record that was stored in your internal
 20 systems?
 21 A. Yes, subject to it being agreed at the subsequent
 22 meeting and of course you have reference that there is
 23 a dispute regarding that. So whether that -- that would
 24 put in question whether that was an official record of
 25 the meeting, but I note it was agreed at the subsequent
 131

1 of TEO former ministers and SpAd phones; correct?
 2 A. Yeah.
 3 Q. Now, just going back to this meeting, this was a meeting
 4 of civil servants who were dealing with the response on
 5 the part of the TEO to the Inquiry --
 6 A. Yes.
 7 Q. -- is that correct?
 8 A. That's correct, yes.
 9 Q. So it was only a meeting, thank you, we can see from the
 10 top of the page, of civil servants who were involved in
 11 the response, correct, and a legal adviser?
 12 A. Yes.
 13 Q. Can you help us with who these minutes were intended
 14 for? For whose benefit are they made?
 15 A. They would be minutes as part of those, a three-tiered
 16 structure in terms of the Inquiry oversight and
 17 assurance group that we had, the HOCS, the HOCS
 18 oversight group, which actually the meeting that I was
 19 on 9 May and that wasn't this issue wasn't raised during
 20 that oversight group on 9 May. Then the next level is
 21 the compliance and assurance group which this is the
 22 meeting that's referring to and that would have
 23 representation from different -- different leads across
 24 the area and also representation from DSO and it is for
 25 compliance and insurance.
 130

1 meeting.
 2 Q. Insofar as there's a disagreement about what was
 3 discussed, obviously from the final version of that
 4 note, one would have no idea that in fact what had been
 5 discussed was the potential factory reset --
 6 A. Yes.
 7 Q. -- of phones?
 8 A. Yes.
 9 Q. So in terms of the rationale for amending the minute so
 10 that it omits reference to the factory reset, I think
 11 you're aware that the Inquiry has taken witness
 12 statements from the three individuals who were involved
 13 in that, I think one of them is quite a junior
 14 official --
 15 A. Yes.
 16 Q. -- and effectively what she and Ms Homes, who was the
 17 more senior official, appear to suggest was that it was
 18 Ms Homes, the senior official, who decided that the
 19 minute should be in a final form that omitted any
 20 reference to the factory reset --
 21 A. Yes.
 22 Q. -- and omitted any reference to telling the Inquiry
 23 about it.
 24 Can you help me as to your understanding as to why
 25 that was decided or why that was regarded as the right
 132

1 thing to do?

2 **A.** In their submissions which they have provided they have
3 indicated that they changed the reference or reduced the
4 reference because, to quote, that they were not aware of
5 the full information and they were seeking to get
6 further information. In my view, it materially changes
7 the substance of the meeting because not just was the
8 information regarding the actual reset not covered but
9 also the point -- the action point to inform the Inquiry
10 so in my view didn't reflect if the metadata was correct
11 the actual content that was discussed during that
12 meeting. So I would not concur with their view that in
13 abridging it, it should cover that, not much was known
14 about the meeting, my view would be that it should
15 qualify, not much was known about it, but this was the
16 initial view that we have of those issues.

17 **Q.** I mean, I think the reality is to anyone reading the
18 note that the fact that the factory reset had been
19 discovered and was known about would be concealed from
20 them; is that right?

21 **A.** I would concur with that view, yes.

22 **Q.** In terms of trying to understand why, why that would
23 happen, the fact that the full facts weren't known,
24 that's not a reason not to minute something, is it?

25 **A.** No, as I mentioned, Ms Dobbin, I would suggest that if
133

1 the 9th of -- an oversight meeting, where issues should
2 be flagged to the oversight group, so -- for us to deal
3 with those. I would have expected that issue to be
4 flagged at that point, at the earliest possible
5 instance, and for us to take action in terms of
6 informing the Inquiry. I've made that clear to the
7 individuals concerned of that approach, and they've
8 accepted that.

9 **Q.** I think it's right, we don't need to spend too much time
10 on this, but the TEO had a series of meetings with
11 the Inquiry after that date as well and the fact that
12 there had been a factory reset wasn't referred to, was
13 it?

14 **A.** Yes, that's correct, that is it.

15 **Q.** I think, as you've said, it's right that you then, you
16 were informed about it on 4 August, and I think you then
17 put in train an investigation into what the extent was
18 of the data loss and in order to ascertain further
19 information about it; is that right?

20 **A.** That's correct, yes, I did.

21 **Q.** Can we just check, then, obviously at this stage,
22 I think there are two things to point out, obviously
23 the Inquiry's request for evidence about the use of
24 WhatsApps which had been made in September 2022, that
25 had never actually been answered by a witness statement,
135

1 that was the case, my view would be that that should be
2 minuted, that this has been informed, the factual
3 position, and that we're taking further action to
4 clarify that at that point, I --

5 **Q.** Yes, that's really what I wanted to check with you.

6 **A.** Yes.

7 **Q.** There's obviously nothing to preclude a minute from
8 referring to the fact that something has been discussed,
9 but that it's something about which the full facts
10 aren't known, "It needs to be treated with sensitivity",
11 for example, "and we're going to look into this"?

12 **A.** I would concur with that. I believe it was a mistake to
13 edit the meeting to that reductive. And indeed, our
14 code of ethics talks about the open and -- transparency
15 of record-keeping, and I think that indicates that
16 wasn't as open and transparent, if that was indeed what
17 was discussed during the meeting, which is contested as
18 well.

19 **Q.** In terms of any concern on the part of those involved in
20 the minutes about who would read it, do you have any
21 understanding of why there might have been concern on
22 their part of not revealing the full picture of what was
23 discussed at the meeting?

24 **A.** I don't have a view, and I guess I raised it wasn't
25 raised to me until 4 August, and I had a meeting on
134

1 had it?

2 **A.** No, it hadn't, yes.

3 **Q.** And in fact it appears what perhaps what had prompted
4 this information to come to light was because
5 the Inquiry then sent a further Rule 9 request to the
6 TEO on 31 July setting out very specific questions that
7 it wanted answered about the use of informal
8 communications?

9 **A.** Yes, that's correct, yes.

10 **Q.** Just in that intervening period then, between May and
11 August, is it correct then that in fact nothing had been
12 done within TEO to try to investigate or find out what
13 had happened in terms of the data loss during that
14 period of time?

15 **A.** As I referenced, I wasn't aware of that. I understand
16 the permanent secretary was made aware of it when he was
17 giving evidence during the Inquiry. But as far as
18 I could see from the investigation that we commenced in
19 August, no further investigation taken place.

20 **Q.** All right. I think we know, then, and perhaps we can
21 certainly pick this up from your witness statement --
22 that might be the easiest way to pick up what actually
23 happened.

24 If we could go, please, to INQ000422292, and if we
25 could go to paragraph 127, please.
136

1 So I think you have helpfully set out, and I think
2 we can look at it via your statement rather than going
3 to the investigation report, but you set out there the
4 information that was provided, first of all, by the
5 First Minister's office, and -- perhaps if we can we go
6 to the next page, thank you -- what's set out in your
7 statement was -- is what in effect happened to each of
8 the devices; is that right?
9 **A.** That's correct, yes.
10 **Q.** That had been in the possession or which were being used
11 by a number of ministers --

12 **A.** Yeah.

13 **Q.** -- at that time.

14 Now, we don't have time to go into the precise
15 circumstances of each individual. I'll come back to the
16 general picture, if I may, in a second, and I think if
17 we could just go over the page to the deputy First
18 Minister, that's dealt with at paragraph 129, isn't it?

19 **A.** Yeah.

20 **Q.** And I think -- thank you.

21 And I think that it sets out -- and I think this is
22 at page 38, please, of the statement, it may just be
23 over the page, thank you.

24 I think that it sets out that in fact her device,
25 and I'll come to the specifics, that it had been wiped

137

1 private office, they were stored, with the exception of
2 Baroness Foster's --

3 **Q.** Oh, sorry, I understand.

4 **A.** -- when she stood down. So they were retained so we
5 were able to take those for retention.

6 In the case of the First Minister's phone, the PIN
7 was not available and the PINs we were given weren't
8 able to be interrogated when we provided the search.
9 And in the case of the deputy First Minister's office,
10 in that case at that time was Michelle O'Neill, the
11 devices had been reset prior to it being returned. But
12 they were retained and they are still available in their
13 current state, they haven't been reset by IT Assist.

14 **Q.** Will you forgive me, I'm slipping into the mistake of
15 and forgetting that you weren't responsible for every
16 ministerial phone, you're only responsible for those who
17 fell within the narrow --

18 **A.** Yes.

19 **Q.** -- ambit of the Executive Office --

20 **A.** That's correct.

21 **Q.** -- so the First Minister, the deputy First Minister --
22 the two First Ministers, deputy First Minister, and two
23 junior ministers; is that correct?

24 **A.** Yes.

25 **Q.** Okay. And the question of what happened to other

139

1 prior to her returning her devices; is that correct?

2 **A.** That's correct.

3 **Q.** But I think if I may just generally set out the position
4 in terms of, some ministers, when the power-sharing
5 arrangements ended, returned their devices to their
6 private offices, and private offices sent those devices
7 to IT Assist, and they wiped the devices; correct?

8 **A.** Yes, it's fair to say that when the analysis was done
9 there wasn't a consistent approach in TEO, post -- when
10 I was in post, the devices were retained in the
11 private office. Baroness Foster's device was returned
12 prior to me taking up post, but in the other offices
13 there was a different -- differentiated approaches
14 taken.

15 **Q.** I'm just going to take it generally, if I may. So for
16 some ministers they returned their devices to their
17 office, their offices sent them to be wiped. The
18 question of whether or not they had WhatsApps on them or
19 other informal communications and may have deleted them
20 beforehand is a different question and a matter for
21 them, but in terms of the process that happened within
22 TEO, those devices were effectively cleansed or wiped
23 within the Executive -- well, within IT Assist, which
24 I think sits within the Department of Finance?

25 **A.** Yeah. Actually in TEO the devices were retained in the

138

1 ministerial phones is a separate question --

2 **A.** Yes.

3 **Q.** -- effectively, because they were dealt with within
4 their own departments and private offices?

5 **A.** And I understand other Rule 9 statements also --

6 **Q.** Yes.

7 All right, so just -- but I think we do know, don't
8 we --

9 **A.** Yes, we do, yes.

10 **Q.** -- that a number of those phones were also variously
11 either returned to IT Assist and wiped, or they were
12 wiped or cleansed before they were handed in; is that
13 correct?

14 **A.** That's correct. And for the purposes of -- to assist
15 the Inquiry, given the issues that were raised, that was
16 why I convened a cross-departmental group to have
17 a view, obviously, to -- of what had happened to each of
18 those devices, so at least there was information
19 consistently. And the report that I actioned, the
20 internal audit report, covered all devices in the
21 phone -- for those phones.

22 **Q.** Well, we won't go into every device and what happened,
23 I think the important point may be how that happened,
24 given the extent to which, within TEO, you had
25 translated and provided the instructions that had come

140

1 from Cabinet Office, and given the formal internal legal
 2 guidance that had been provided, and given the efforts
 3 that had been gone to to ensure that different
 4 departments understood what their obligations were. And
 5 I put that in a compound way, but I think that the
 6 overarching question remains how, despite all of that,
 7 did it happen that TEO -- or that the processes within
 8 government in Northern Ireland meant that when devices
 9 were returned they were -- a number of them were simply
 10 sent to internal IT department and wiped?
 11 **A.** Yeah, and for me that is an area of, I guess,
 12 significant concern, and issues that there wasn't
 13 a consistency of approach, but also that the
 14 expectations that were set in the correspondence weren't
 15 delivered, notwithstanding the efforts that had been
 16 made.
 17 I think there's in -- the report analyses overall
 18 the kind of various different points that there were
 19 from that perspective. If you take the overall, the
 20 governance perspective sits with the permanent secretary
 21 through the information, kind of, owner and asset owner,
 22 and the obligation to inform, then, private office staff
 23 and the various checks and balances that were made.
 24 I think overall, from the awareness of the Rule 9
 25 responses that came from departments, there seemed to be

141

1 Had private offices been advised of the implications
 2 in terms of those areas, had sufficient kind of
 3 assurances been got in terms of retention policies?
 4 What was given effect, broadly, across departments was
 5 that there was a hold on deletion in terms of Content
 6 Manager, which is the official record, but, however, it
 7 is my understanding that, rightly, that the Inquiry
 8 would want all official information, in whatever channel
 9 that was provided.
 10 And I guess also the obligations, there was
 11 requirements on both ministers and SpAds, and indeed
 12 officials, that notwithstanding whatever channels they
 13 used, that it should be kept and be available for FOI,
 14 which in turn makes it available. So there was
 15 an obligation on all actors in this to provide that in
 16 terms of the system and to disclose that which is
 17 included in the Ministerial Code and the guidance of
 18 their office and the special advisers' code and handling
 19 information.
 20 **Q.** I think there's probably bound up in that a number of
 21 different issues. As I understand what you're saying,
 22 you're referring to official information. I think
 23 the Inquiry just looks at information. But I think what
 24 you're suggesting is that there was a fundamental
 25 misunderstanding as to whether or not informal

143

1 a gap between my understanding of official information
 2 and the understanding of official information and
 3 official records, and official records being the
 4 official record that was held in the system in terms of
 5 Content Manager, but my understanding, which I think is
 6 correct under the Inquiries Act, that official
 7 information is all information, and, in the same sense
 8 as a FOI, is all information with the caveats of those
 9 which don't have to be disclosed for particular reasons.
 10 And I think that that was a disconnect in terms of their
 11 perception of what met the requirements of disclosure,
 12 that it wasn't correctly all official information. And
 13 I think that's been characteristic of the engagement
 14 that we would have had, very regrettably, with
 15 the Inquiry in terms of the fulsome of the
 16 information that has been provided, which to me was very
 17 clear -- and coming into post, was very clear, in the
 18 information provided, but did not appear to be clear in
 19 terms of how that was given effect to within the
 20 departments. And I guess if we look towards the report
 21 that was done, it analyses kind of policies in one
 22 context and another context. So if a device is returned
 23 to IT Assist, it should be reset, but there should have
 24 been a decision made not to reset that because we were
 25 in a special environment.

142

1 communications would fall within the definition of that
 2 which was required by the Inquiry?
 3 **A.** I think there was, it was possibly not the informal
 4 communications, it was the nature of the information
 5 within that. And I think there was a view that that was
 6 regarding decision-making and the formal record versus
 7 everything that is pertinent to the work of governance,
 8 I guess the context for a decision, and certainly some
 9 of the information which has been disclosed here.
 10 I would say that vast swathes -- we -- I think we have
 11 provided 270 strings of information from the Executive
 12 Office. We provided all my messaging, all the senior
 13 civil servants have provided that information, and
 14 indeed some ministers have provided that information at
 15 all. I think what this -- the system failed to look at
 16 the collective responsibility as part of that to give
 17 effect to the legal guidance.
 18 **Q.** I think that that probably trespasses, as it were, into
 19 a distinct issue as to whether or not what's contained
 20 in informal communications is relevant, but I think
 21 what's clear is that it wasn't as though there was any
 22 analysis or consideration of what might be relevant or
 23 not, the devices were being wiped wholesale without
 24 anyone addressing whether or not there might be any
 25 relevant material.

144

1 **A.** I have seen no evidence provided within departments that
2 there was a question to confirm that all information on
3 those devices was in the -- was provided on to Content
4 Manager on the public record. Perhaps -- that's my
5 understanding.

6 **Q.** Yes, I'll come back, because I think we probably just
7 need to make sure that we are clear on our understanding
8 of that?

9 **LADY HALLETT:** Can I just follow your answer there,
10 Ms Brady. No evidence that anybody did check that they
11 were deleting what might be relevant information, is
12 that what you said, or do you say the opposite?

13 **A.** I haven't seen any evidence in terms of the Rule 9
14 statements that have been provided that there was
15 confirmatory from ministers when they handed back their
16 phone that all information that was on the system.

17 **LADY HALLETT:** Had it been recorded elsewhere?

18 **A.** No, that would be their requirement to do that under
19 their ministerial code of ethics in terms of providing
20 information and also the -- their guidance which they --
21 took place in May -- in March 2020 when they took up
22 office as well as special advisers.

23 **LADY HALLETT:** So they were wiped without anyone checking
24 that the material had been recorded elsewhere?

25 **A.** That's my understanding, yes.

145

1 should be provided and trimmed. We have a system called
2 Content Manager which keeps the records, the official
3 records and then we have a system called
4 KnowledgeNetwork which records decisions in the Office
5 of the First Minister and deputy First Ministers. All
6 decisions must be made jointly so there is a significant
7 process in terms of capturing those in decision-making
8 so that would be the responsibility of the
9 private office to facilitate and put all those systems
10 within that official record.

11 **Q.** So it's a conscious and deliberate decision --

12 **A.** Yes.

13 **Q.** -- I'm going to make sure this email is committed to our
14 central systems?

15 **A.** Yes.

16 **Q.** In terms of then the position about informal
17 communications, I think it's right that guidance within
18 government in Northern Ireland did recognise that
19 informal communications could in fact constitute
20 information that should be retained as well; is that
21 right?

22 **A.** Yes --

23 **Q.** Sorry, just there's two parts to this question, and that
24 that was generally -- that was the position before 2020,
25 it's not a new position?

147

1 **LADY HALLETT:** Thank you.

2 **MS DOBBIN:** Yes, and to be clear, these aren't just phones,
3 are they, I think they're iPads as well, so -- and
4 I wanted to ask you about that. I think some of these
5 devices must have had emails on them as well, it's not
6 just text messages or informal communications; is that
7 correct?

8 **A.** I'm not aware of -- I mean, if it was an email, that
9 would be on the system as well.

10 **Q.** That's what to --

11 **A.** There would be tensions --

12 **Q.** We can see whenever we look at emails from senior civil
13 servants and ministers that some of them have trim at
14 the top of them?

15 **A.** Yes.

16 **Q.** And that's what indicates that that has been retained
17 within your centralised --

18 **A.** Yes, yes.

19 **Q.** -- system?

20 **A.** That's correct.

21 **Q.** So not every email, just to be clear about this,
22 automatically gets committed, does it, to a central
23 record, it has to be, is it forwarded on or --

24 **A.** That would be for the private office so the information
25 asset owners would make a decision on what information

146

1 **A.** Yes.

2 **Q.** I think if we, and I wouldn't -- I would quite like to
3 just check that I have the document correct that conveys
4 that. That's INQ000398064.

(Pause)

6 So although this is a Department of Finance
7 document, I think the Inquiry's been provided with it by
8 a number of departments.

9 **A.** Okay.

10 **Q.** I think we understand that it was in circulation in
11 2019, but you may know --

12 **A.** Yeah.

13 **Q.** You may be able to confirm that.

14 It foresees, or the premise of it is it understands
15 that official information may nonetheless be obtained
16 within informal communications --

17 **A.** Yes.

18 **Q.** And it expressly refers to --

19 **A.** Yes.

20 **Q.** -- WhatsApps.

21 Certainly, and this is a very simple guide, isn't
22 it, it's not complicated?

23 **A.** No, absolutely, no, yes.

24 **Q.** That must be right, that it's understood that it
25 doesn't -- the medium through which you communicate

148

1 doesn't really matter, it's the content of the, of what
2 you're communicating that ultimately makes it official
3 information which should be subject to proper recording?

4 **A.** Absolutely, yes.

5 **Q.** I think as well again if we can just look at some of
6 your -- the policies that existed at the time, there's
7 another policy, the NICS records management policy, and
8 that's INQ000409746, and I think if we could look at
9 page 4, thank you, and I think the scope of it is
10 helpful, because it says that it applies to the
11 management of all documents and records in all formats
12 or media created or received by NICS departments in the
13 conduct of their business activities?

14 **A.** Absolutely, yes.

15 **Q.** So I don't think there's any suggestion that
16 Northern Ireland's behind the curve in any way of
17 understanding the potential importance of informal
18 communications prior to the pandemic?

19 **A.** Yes.

20 **Q.** Then also if I may take you to another piece of guidance
21 and that's INQ000409674. Now, this is later, this is
22 June 2022. But again if we look at section 8 of that,
23 please, so again setting out that officials -- in fact
24 you might be able to help me on this. Is this intended
25 to apply to ministers?

149

1 between conversation, informal communication about
2 social events on the one hand and something that is to
3 do with business, and that is sufficient to move it into
4 the official business categorisation; correct?

5 **A.** And indeed and we're all under the FOI obligations which
6 meet the same test, yes.

7 **Q.** I don't know if you've looked at any of the WhatsApp
8 communications that the Inquiry has from
9 Northern Ireland, but in large part they do appear to
10 discuss official business, don't they?

11 **A.** Yes.

12 **Q.** There's a little bit of social chat in them, but in fact
13 in large part they're not discussing those sorts of
14 things, they're very firmly on the business side, aren't
15 they?

16 Some individuals have suggested that they just used
17 WhatsApps for administrative matters, but again when one
18 looks at some of the discussion, it's quite clear again
19 that if administrative means fixing up meetings or that
20 kind of thing, they go well beyond that as well, don't
21 they?

22 **A.** Yes, they do, that's correct.

23 **Q.** And I think we've seen ministerial discussions also by
24 WhatsApp and again it's right to say, isn't it, they're
25 very firmly on the business side of discussions rather

151

1 **A.** Yes.

2 **Q.** And this was to everyone, to special advisers and
3 ministers?

4 **A.** Yes.

5 **Q.** That you should try and ensure that all official
6 information is saved on to corporate systems; yes?

7 **A.** Yes.

8 **Q.** And then I think it's probably important the recognition
9 that conversations that are held informally can quite
10 easily drift into official matters, and the specific
11 example that's given there is talking about a social
12 event that then becomes a discussion about official
13 business; yes?

14 **A.** That's correct, yes.

15 **Q.** And then making sure -- and again it's very clear, isn't
16 it, at that point in time it becomes a matter of
17 official business, so therefore you should be treating
18 it as such; yes?

19 **A.** That's correct, yes.

20 **Q.** Thank you, that can come down.

21 If I can just ask you about that, that doesn't
22 set -- it doesn't really set any sort of threshold for
23 what is official business as such?

24 **A.** No.

25 **Q.** It recognises a very clear delineation, doesn't it,

150

1 than on any sort of social side?

2 **A.** The ones I'm aware of, yes.

3 **Q.** And they're not administrative either, they're well
4 beyond fixing up meetings as well; do you agree?

5 **A.** From the ones I've observed, yes.

6 **Q.** We haven't seen any evidence, but perhaps you can assist
7 us, that those kind of communications were being
8 trimmed, I think is the term that you use whenever
9 they're committed to your official record, is that your
10 understanding?

11 **A.** I haven't seen the specific information, I think
12 contemporaneously with that at the same time there was
13 guidance placed on our intranet to provide vehicles for
14 downloading WhatsApps to be placed in terms of the
15 formal record in terms of Content Manager, I'm aware of
16 individuals talking that they are referring to having
17 done that but I don't know at what scale it is within
18 the organisation.

19 **Q.** I mean, in terms of how official business is conducted,
20 I mean, as a generality it's obviously important, isn't
21 it, that these kind of discussions are captured and
22 committed somewhere because even just setting to one
23 side that they fall on the official side of things, they
24 may be discussing matters of import as well; do you
25 agree?

152

1 A. Yes I -- yes, I agree.

2 Q. I think when one looks at the communications about Covid
3 and the response to the pandemic that we can see in some
4 of the WhatsApps, it would be difficult to characterise
5 them as irrelevant or meaningless; they are substantive
6 discussion in some parts, aren't they?

7 A. Yes, I concur it's a significant issue that we have
8 failed to address adequately through this Inquiry
9 providing this but also more broadly under the
10 obligations under the FOI.

11 Q. I think it's just focusing -- it's just moving beyond
12 the issue of the Inquiry I think there's the broader
13 principled issue about ensuring that government business
14 is conducted in an appropriate forum first, and there
15 must be issues as to whether or not WhatsApp is always
16 an appropriate forum, but if those discussions take
17 place that there is proper recording and commitment of
18 them to memory as well?

19 A. Yeah and my view in terms of those areas that we provide
20 I guess much flexibility in terms of the scale of doing
21 that we have since provided technology solutions that
22 actually have our messaging system within them
23 (inaudible) that client which does not require users to
24 manually upload those systems to provide a framework
25 where you don't have to look towards assurance of

153

1 we need in terms of the openness, these issues were
2 issued in RHI. The guidance, as you stated, although
3 complex is also clear and we have still the same issues
4 that we're dealing with now which is a matter of regret.
5 I welcome that we're hearing it now because it shows the
6 journey that we still need to travel but these were
7 identified through the RHI analysis both in
8 record-keeping and the culture of openness and
9 transparency were those two big factors.

10 MS DOBBIN: I think that might be --

11 LADY HALLETT: Certainly.

12 MS DOBBIN: -- a good moment.

13 LADY HALLETT: We will take a break. Quarter past.

14 MS DOBBIN: I'm grateful, my Lady.

15 (3.00 pm)

(A short break)

17 (3.15 pm)

18 LADY HALLETT: Ms Dobbin.

19 MS DOBBIN: Before the adjournment, you had mentioned the
20 fact that it was recognised that there was a need
21 perhaps for better governance in respect of informal
22 communications. I think one of the things that's
23 conspicuous is that departments seemed to have their own
24 guidance as well, so there's a profusion of guidance and
25 it's not -- it doesn't appear to be always the same

155

1 individuals to make sure they're providing those
2 solutions online and part of that was the -- I guess we
3 also were explicit in excluding the use of personal
4 devices and I think those are a significant
5 vulnerability and we define exceptional circumstances
6 you can use for non-official communications channels.
7 And I think that's an issue as well so I think what this
8 has shone a light in is all the vulnerabilities within
9 the system. You've identified many different reports
10 and policies but actually all of them have shown to have
11 failed in this scenario to get the information and
12 I think that's of deep regret for the service for
13 Northern Ireland, but also to get the information for
14 the bereaved families and the information that they
15 deserve for the learnings of that and it is a matter of
16 deep regret. I think some of it is technology, or
17 technology and service has been very slow, Content
18 Manager is a 20-year old platform built for paper
19 records. We have no document management system, so
20 everyone trims into that document and actually we have
21 we had no secure client in terms of 365 or areas to
22 provide cloud storage. We have moved on from
23 a technology perspective. We have now a secure client
24 where all information is within that but I think there's
25 a bigger journey in terms of the cultural aspects that

154

1 between different departments as well.

2 Is that something that's been addressed in terms of
3 having unified guidance that applies across the board?

4 A. I think it was covered previously in the Inquiry, the
5 different constitutional matter of the Northern Ireland
6 Civil Service, my inability to direct
7 permanent secretaries. But also the Department of
8 Finance is not just the Department of Finance, it's also
9 the department of personnel and the department for
10 shared IT services. So the code of ethics is defined in
11 a different department by the finance minister. So
12 whilst they provide some of those framework documents,
13 called the NICS frameworks, and that's within the
14 finance minister's purview. Each department, because it
15 is a separate legal entity, has developed its own
16 policies which, in my view, (inaudible) out to be
17 fragmented and inconsistent, and requires a level of --
18 an inability to have a co-ordinated approach where there
19 are coo-ordinated aspects of those areas.

20 One area that we have looked to address that in the
21 last number of years is to provide a consistent
22 technology platform. We talked about -- I talked about
23 Microsoft Office 365 which has now been rolled out to
24 27,000 civil servants across the service, and it's
25 within a secure client-based -- it's a cloud-based

156

1 network, so provides a consistency, because those
2 applications are managed centrally, so our video
3 sharing, our messaging system is included with those
4 areas, so with tools we can do that.

5 However, the practice that we talk about the
6 information governance at the moment, that resides
7 constitutionally with each department, so the permanent
8 secretary is the accountable for information governance.
9 What we're trying to do to make the system work more
10 appropriately is to have an information governance forum
11 which would have those senior information officers
12 collectively, and indeed we're going to bring
13 a recommendation to our Civil Service board that we can
14 provide some overlay and insights into that.

15 However, as civil servants, we cannot impact the
16 constitutional nature, which has the different legal
17 accountability which is rightly in place as part of the
18 Belfast/Good Friday Agreement.

19 **Q.** It might be seen as surprising that that should be
20 an obstruction to just having clear universal policies
21 that apply across each department.

22 **A.** Well, in some senses it's a framework of which there is
23 compliance. There will be specific different
24 requirements within each department. For example, the
25 retention policies in a very large organisation perhaps

157

1 Do you have any view on that and whether there is
2 a wider issue potentially within TEO around those sorts
3 of issues?

4 **A.** I can see how the pattern of events compounds to draw
5 those characteristics, on that specific issue. For me
6 there are three particular areas of concern. First is
7 when the disclosure happened, why were not all items
8 disclosed, not just the formal minutes, but actually the
9 handwritten minutes as well, which is that first aspect,
10 which is a concern about what was the understanding of
11 the areas to be disclosed.

12 The second piece, which is, I guess, inexplicable is
13 why was the full set of available notes not provided and
14 why were some lost as part of those areas?

15 And then the third aspect is, when that was found
16 and identified, why did it take so long for each of
17 those steps, as you outlined this morning, for that to
18 become aware, and when it was provided why was it not
19 correctly handled.

20 And each of those are very significant issues and
21 concerns for me. They're both inexplicable, I heard of
22 those dates in correspondence today. I was unaware of
23 the lack of disclosure of that item until you addressed
24 that on Tuesday and I heard again of those dates today.
25 So the lateness of information coming even within the

159

1 which has people who are providing road maintenance or
2 other more manual services different from a different
3 type of office. So in the retention policies and the
4 schedules that are kept there is an ability for nuance,
5 but I do agree that in the overall framework there is
6 a significant opportunity for consistency in
7 application.

8 **Q.** I'm moving on now to the final topic, if I may.

9 The Inquiry heard this morning about the fact that
10 there were specific minutes that had been sought from
11 the Executive Office, and that repeated requests were
12 made for them, and that those requests went unanswered,
13 and that it wasn't until the fact that that minute
14 hadn't been provided was opened at the start of the
15 Inquiry that the minute was provided.

16 If that's looked at, for example, in relation to the
17 fact that the wiping of the devices or the reset of the
18 devices was excised from the minutes of the meeting on
19 9 May, that might give the impression that there is
20 an issue that if there is something difficult or
21 something that's potentially embarrassing, that that
22 is -- that, rather than being transparent about it or
23 open, that steps are taken perhaps not to reveal, in the
24 hope that maybe the issue will go away. That's
25 certainly the impression that might be given.

158

1 service, notwithstanding the lack of -- lack of issues
2 addressed, I've asked -- following this correspondence,
3 I have -- DSO to undertake an investigation in terms of
4 what has happened in that specific case.

5 But I think overlaying of this there will be many
6 questions which will have to be asked about the late
7 providing of information, the rationale why that was
8 provided late, and how this builds into the overall
9 perspective of what we're trying to achieve in
10 fulfilling our objectives, our commitments in the code
11 of ethics in terms of openness and transparency, and
12 there are many areas of concern that have been raised
13 through this process as well.

14 **MS DOBBIN:** I'm grateful.

15 My Lady, those were my questions.

16 Questions from THE CHAIR

17 **LADY HALLETT:** Can I ask, Ms Brady, that any report of the
18 investigation that you respond to me with the answers to
19 the questions you've raised, because, as I said this
20 morning, I find it of quite considerable concern, as you
21 can imagine. It's not just this module, it's other
22 modules to come, and I need to ensure that I get all the
23 material that I need, and when the team need it and when
24 the core participants need it. Everyone needs it in
25 reasonable time.

160

1 So would you mind giving me an undertaking that you
2 will keep me informed as to what happens to your
3 investigation?

4 **A.** My Lady, I apologise. I, in the briefing, have advised
5 that that would be for your purposes as well, to assist
6 that inquiry as well, so of course we will keep you
7 engaged. And perhaps even, if you were so minded, in
8 terms of the terms of reference, for that assessment as
9 well.

10 **LADY HALLETT:** Thank you very much.

11 Can I ask you a question, and I've got to be careful
12 here I don't tread on sensitive toes, and it's
13 a question of having the separate departments for the
14 Civil Service and not having, as I'm used to in London,
15 the overall -- and indeed they have in Wales and
16 Scotland.

17 You mention in your statement that the
18 Northern Ireland Assembly's Public Accounts Committee
19 recommended that you had a similar system to Scotland
20 and Wales and, not stepping on toes, I hope, but I can
21 see the sense of that. Given that I probably shouldn't
22 be going down what should happen in Northern Ireland in
23 ordinary times, what about in a national emergency? Can
24 you see any scope for saying that to ensure that in
25 a national emergency, when people are suffering and

161

1 of that. Because notwithstanding the meetings and the
2 minutes and the WhatsApps, there's a -- handwritten
3 notes of things as you operate with civil contingencies,
4 and that should be designed in upfront and it should be
5 able to be directed.

6 So I think there is a real clear area. Not in
7 everything, because departments have their own primacy,
8 but in areas where there needs to be significant
9 cross-cutting I think it's inherent vulnerability
10 command and control works, you need that stability in
11 a civil contingencies environment, and it is
12 a vulnerability in our system.

13 **LADY HALLETT:** You need somebody who, I don't know, can
14 co-ordinate and has the power to control -- as the
15 First Minister and the deputy First Minister were
16 complaining, they didn't -- there they were, faced with
17 a national emergency, and there they were at the top of
18 government but they don't have the power to control
19 departments.

20 **A.** They have no power to control departments. The -- that
21 is vested. It's only those significant controversial
22 and cross-cutting. And I guess the very valid point, in
23 that the public expect the Civil Service to deliver on
24 those core aspects to support those executives.
25 However, without the power to mandate them to do areas,

163

1 dying, all the departments work together, and you as
2 head of the Civil Service could ensure that all the
3 information coming from them, everything is properly
4 synthesised and properly presented to ministers? Do you
5 think there's any scope for that kind of recommendation?

6 **A.** Yeah, I think there is an inherent vulnerability in our
7 system in the lack of that accountability. We talked
8 about the Executive with ministers and the areas to come
9 to cross which are significant and cross-cutting, or via
10 the Executive Committee. There is no corollary in the
11 Civil Service. So Ms Dobbin made the very clear point:
12 why is there no consistency? That is an absolutely
13 clear position. And whilst I live within my
14 constitutional confines, what I can do -- because it is
15 not okay for me to say to citizens "This is just too
16 hard, this is the constituency that we're in" -- I and
17 Civil Service board provided independent,
18 non-Executive -- create those structures. And also,
19 through the reflections, particularly when we have had
20 no government on how we would run and operate
21 Northern Ireland, we're working through the civil
22 contingencies framework. And I believe, and it's part
23 of my evidence, that we can actually provide
24 a framework. When we go into a civil contingencies,
25 information governance should be a critical core aspect

162

1 you know, there is areas of conflict, so even in
2 procurement of the report we had to get assurances
3 within that and convince it's all soft power, and soft
4 power often doesn't work in very difficult environments.

5 **LADY HALLETT:** Thank you very much.

6 Those are all the questions I had. I don't think
7 anybody else had any questions, did they?

8 Thank you very much, Ms Brady, I'm grateful to you.

9 **THE WITNESS:** Thank you.

10 **(The witness withdrew)**

11 **LADY HALLETT:** Right. Well, I think that completes --
12 whereas I thought we were going to have a long day
13 today, I think that completes it somewhat early, but I'm
14 very grateful to everybody for the timing.

15 It's 10 o'clock Tuesday morning?

16 **MS DOBBIN:** You're right, it is. Thank you, my Lady.

17 **LADY HALLETT:** I hope everyone gets as good a weekend as
18 they can. Thank you.

19 **(3.30 pm)**

20 **(The hearing adjourned until 10 am
21 on Tuesday, 7 May 2024)**

25

164

	INDEX	
		PAGE
1		
2		
3	Statement by LEAD COUNSEL TO THE INQUIRY	1
4	for MODULE 2C	
5		
6	MS KAREN PEARSON (affirmed)	8
7		
8	Questions from LEAD COUNSEL TO THE INQUIRY ...	8
9	for MODULE 2C	
10		
11	Questions from MS CAMPBELL KC	98
12		
13	MS JAYNE BRADY (sworn)	104
14		
15	Questions from LEAD COUNSEL TO THE INQUIRY	104
16	for MODULE 2C	
17		
18	Questions from THE CHAIR	160
19		
20		
21		
22		
23		
24		
25		

LADY HALLETT: [40] 7/14 8/1 17/3 23/4 23/6 23/13 23/19 34/13 34/15 48/22 48/24 49/3 62/14 62/19 83/1 92/9 92/14 97/1 97/6 97/19 97/21 97/25 98/7 103/25 104/6 104/15 113/9 145/9 145/17 145/23 146/1 155/11 155/13 155/18 160/17 161/10 163/13 164/5 164/11 164/17	13 August [1] 9/22 13 different [1] 129/23 14 June 2021 [1] 114/12 14 June 2022 [2] 121/16 122/16 14 March [1] 29/14 16 June [1] 3/23 16 September 2021 [1] 115/13 16th [1] 116/9 17 [1] 55/7 17 March [12] 30/12 31/5 31/23 32/1 32/17 33/14 37/11 41/16 49/12 99/9 100/12 100/24 17 March 2023 [1] 3/1 17th [4] 29/23 29/24 30/2 100/6 18 [2] 119/16 120/18 18 March [5] 28/3 41/25 42/9 42/25 56/23 183 [1] 66/13 18th [1] 42/8 19 [1] 16/15 19 February [1] 9/1 19 March [1] 38/13 1986 [1] 12/14 1998 [1] 12/17 1st [1] 116/4	4/25 6/5 11/14 120/20 126/4 126/6 126/12 2024 [6] 1/1 8/14 9/1 105/12 105/17 164/21 21 March 2024 [1] 105/12 21 September [1] 74/15 22 [2] 15/23 16/3 23 [2] 15/15 16/3 23 March [1] 57/15 23/02 [1] 105/6 237 [1] 84/15 25 February [1] 15/6 25 March 2024 [1] 105/17 26 March [2] 51/22 99/2 27 March [3] 55/16 57/9 101/25 27,000 [1] 156/24 270 [1] 144/11 27th [1] 100/11 28 February 2024 [1] 8/14 28 March [1] 44/16 2C [11] 1/3 1/8 3/5 3/9 5/1 8/3 104/18 122/19 165/4 165/9 165/16	7 7 June 2022 [1] 120/20 7 June 2023 [1] 3/21 7 May 2024 [1] 164/21 70 [1] 9/16 71 [4] 9/17 9/18 10/13 10/18 74 individuals [1] 116/21 75 [2] 94/10 95/9	17/1 23/8 129/4 135/8 accepting [2] 76/11 101/24 access [3] 32/5 46/1 96/5 accord [1] 68/5 account [3] 36/17 97/7 97/10 accountability [2] 157/17 162/7 accountable [1] 157/8 accounting [4] 107/13 107/15 108/19 118/11 Accounts [1] 161/18 accurate [1] 53/24 accurately [1] 123/11 achieve [1] 160/9 acknowledge [1] 110/10 acknowledged [1] 19/20 across [23] 13/13 22/7 29/20 29/23 31/10 33/24 36/10 38/21 46/12 48/2 68/12 73/24 80/9 92/6 95/15 115/13 116/19 116/21 130/23 143/4 156/3 156/24 157/21 act [4] 79/18 110/14 118/4 142/6 action [8] 16/5 33/7 72/9 90/1 93/13 133/9 134/3 135/5 actioned [1] 140/19 actions [13] 31/11 33/5 36/6 36/24 39/21 41/9 46/13 46/14 46/18 47/23 56/18 57/19 58/5 actively [1] 27/23 activities [1] 149/13 activity [2] 88/24 113/5 actors [1] 143/15 acts [1] 81/13 actual [2] 133/8 133/11 actually [25] 21/11 35/5 35/6 37/22 67/16 84/1 85/19 87/18 88/17 88/23 91/15 110/18 111/3 111/3 111/7 125/18 130/18 135/25 136/22 138/25 153/22 154/10 154/20 159/8 162/23 addition [2] 84/16 123/3 additional [1] 71/13 address [8] 1/4 1/7 16/5 66/13 103/2
MS CAMPBELL: [2] 98/12 103/24 MS DOBBIN: [25] 1/4 7/24 8/4 17/6 23/5 23/22 34/20 48/20 48/23 49/4 63/5 83/5 92/13 92/16 104/12 104/16 104/19 113/10 146/2 155/10 155/12 155/14 155/19 160/14 164/16 THE WITNESS: [2] 104/4 164/9	0 02 [1] 105/6 1 1 June 2023 [1] 3/8 1 September 2021 [2] 106/9 109/12 1.45 [1] 104/6 1.45 pm [1] 104/9 1.50 pm [1] 104/11 1.8 [1] 47/3 1.9 [1] 47/3 10 [1] 45/22 10 am [1] 164/20 10 June 2021 [1] 113/24 10 o'clock [1] 164/15 10.00 am [1] 1/2 11 April [2] 3/20 4/3 11 April 2023 [1] 3/1 11 May [3] 128/18 129/6 129/9 11 October [1] 73/4 11.12 am [1] 48/25 11.30 [1] 48/24 11.30 am [1] 49/2 12 June 2023 [1] 120/20 12 March [2] 41/15 63/10 12 May [1] 65/19 12.47 pm [1] 104/7 127 [1] 136/25 129 [1] 137/18	2 2 July [5] 1/10 1/22 3/6 6/3 10/23 2 July 2020 [7] 2/16 2/21 4/9 4/23 5/6 6/7 7/4 2 June 2023 [1] 3/17 20 February [1] 41/13 20 June 2023 [1] 4/4 2012 [1] 13/1 2019 [3] 13/3 13/7 148/11 2020 [19] 2/16 2/21 4/9 4/23 5/6 6/7 7/4 28/6 44/18 68/1 85/21 87/8 88/23 106/21 107/1 109/3 111/14 145/21 147/24 2021 [9] 106/9 107/1 108/17 109/4 109/12 109/18 113/24 114/12 115/13 2022 [9] 116/22 120/6 120/13 120/20 120/22 121/16 122/16 135/24 149/22 2023 [18] 2/9 2/17 2/22 3/1 3/1 3/8 3/17 3/21 3/23 4/4 4/13	3 3 August 2023 [2] 2/9 6/5 3 February [1] 9/21 3 May 2024 [1] 1/1 3.00 pm [1] 155/15 3.15 pm [1] 155/17 3.30 pm [1] 164/19 30 March [1] 55/13 30th [1] 55/17 31 July [1] 136/6 31 July 2023 [1] 4/25 340 [1] 93/5 365 [2] 154/21 156/23 38 [1] 137/22 4 4 August [2] 134/25 135/16 4 March [2] 24/2 29/5 5 58 [1] 74/16 580 [1] 116/19 580 people [1] 123/23 6 6 August [1] 9/21 6 July 2023 [1] 4/13	7 7 June 2022 [1] 120/20 7 June 2023 [1] 3/21 7 May 2024 [1] 164/21 70 [1] 9/16 71 [4] 9/17 9/18 10/13 10/18 74 individuals [1] 116/21 75 [2] 94/10 95/9 8 8 February 2023 [1] 2/17 800 [3] 19/7 21/20 21/23 9 9 March 2023 [1] 2/22 9 May [7] 126/17 127/18 128/10 128/13 130/19 130/20 158/19 9 May 2023 [2] 126/4 126/12 9th [1] 135/1 A abbreviated [1] 131/17 abide [1] 52/25 abiding [1] 89/3 ability [2] 74/4 158/4 able [17] 7/10 9/8 17/10 18/4 18/23 27/10 33/6 39/12 57/21 60/15 67/6 74/6 139/5 139/8 148/13 149/24 163/5 about [177] above [2] 36/6 52/18 abreast [1] 48/5 abridging [1] 133/13 absent [3] 45/17 45/19 45/20 absolutely [17] 20/2 29/5 35/1 47/9 58/21 58/23 62/25 63/4 91/2 94/23 111/9 117/14 129/3 148/23 149/4 149/14 162/12 absorb [1] 103/20 ACC [2] 90/16 91/4 ACC Todd [2] 90/16 91/4 acceleration [1] 68/20 accept [7] 17/13 19/6 21/14 22/10 94/18 96/8 102/12 accepted [5] 16/19

A	73/5 74/10 74/11 75/11 76/5 76/19 76/23 77/4 77/21 79/2 81/5 84/4 84/20 86/5 89/4 91/8 93/22 95/17 95/19 95/20 95/25 96/9 105/14 109/14 110/15 111/22 114/24 119/18 119/19 119/22 119/23 120/7 120/13 120/22 120/23 120/23 121/2 121/20 122/15 124/7 149/5 149/22 149/23 150/15 151/17 151/18 151/24 159/24	126/1 127/19 129/4 129/18 136/20 137/4 140/7 140/20 141/6 142/7 142/8 142/12 143/8 143/15 144/12 144/12 144/15 145/2 145/16 147/5 147/9 149/11 149/11 150/5 151/5 154/8 154/10 154/24 159/7 160/22 162/1 162/2 164/3 164/6	72/24 89/14 102/15 153/15 155/25 am [20] 1/2 7/20 8/18 9/6 20/3 30/23 34/17 37/13 48/25 49/2 62/19 82/2 105/16 106/8 106/14 107/12 107/13 114/14 123/15 164/20 amazing [1] 65/15 ambit [1] 139/19 amended [1] 129/22 amending [1] 132/9 amendments [1] 129/23 amongst [6] 2/19 27/13 63/7 67/23 73/17 111/14 amounts [1] 48/17 analysed [1] 72/16 analyses [2] 141/17 142/21 analysis [4] 26/16 138/8 144/22 155/7 angle [1] 98/22 angles [1] 63/2 announced [4] 102/4 103/22 108/18 113/23 another [11] 34/18 56/8 73/1 74/1 77/20 82/19 87/11 88/14 142/22 149/7 149/20 answer [6] 22/17 30/24 74/6 76/3 100/16 145/9 answered [2] 135/25 136/7 answering [2] 18/16 18/17 answers [2] 38/9 160/18 Anthony [1] 22/6 any [52] 7/2 9/7 20/16 20/17 21/2 26/19 26/20 26/25 28/25 32/3 32/6 32/18 35/4 35/6 36/21 39/22 42/2 45/17 47/1 49/11 49/20 52/8 52/11 69/9 72/18 82/2 83/14 97/1 101/19 113/16 113/17 115/6 117/4 119/9 132/19 132/22 134/19 134/20 144/21 144/24 145/13 149/15 149/16 150/22 151/7 152/1 152/6 159/1 160/17 161/24 162/5 164/7 anybody [3] 38/7 145/10 164/7 anyone [10] 21/23 37/21 38/8 72/22 78/8 97/22 110/18 133/17 144/24 145/23	anything [6] 17/23 32/19 39/6 54/10 78/12 93/8 Anyway [1] 83/6 anywhere [2] 42/14 61/17 apologies [2] 108/13 113/8 apologise [2] 104/12 161/4 apparent [1] 75/12 appear [6] 4/17 126/21 132/17 142/18 151/9 155/25 appears [4] 126/17 126/22 129/24 136/3 appetite [1] 15/1 applicability [1] 21/9 applicable [3] 20/20 32/25 33/2 application [1] 158/7 applications [1] 157/2 applied [2] 21/4 114/19 applies [2] 149/10 156/3 apply [3] 85/7 149/25 157/21 appointed [4] 106/21 108/17 109/6 109/8 appointment [2] 108/16 108/17 appraise [1] 117/19 appreciate [1] 72/9 appreciated [2] 7/7 21/5 appreciates [1] 71/20 approach [13] 30/8 33/24 34/24 36/16 36/20 36/22 66/4 90/12 98/22 135/7 138/9 141/13 156/18 approached [1] 1/20 approaches [2] 33/4 138/13 appropriate [3] 48/20 153/14 153/16 appropriately [1] 157/10 April [4] 3/1 3/13 3/20 4/3 are [83] 5/10 5/11 5/12 5/19 8/16 9/3 9/4 11/7 17/19 23/4 25/13 25/14 26/6 31/21 34/15 37/8 42/2 44/7 46/2 48/11 49/12 51/1 52/12 55/6 55/23 56/18 57/21 57/23 58/6 62/15 62/17 66/12 72/12 73/25 74/3 79/19 86/21 87/7
----------	---	---	---	--

A	ascertain [1] 135/18	44/16	61/20 80/23 80/23	150/12 150/16
are... [45] 88/11 96/2	aside [1] 101/23	assurance [6] 117/24	91/7 99/9 99/15 101/2	becoming [2] 23/23
99/12 100/10 100/23	ask [43] 1/25 5/22	118/16 120/9 130/17	103/3 110/15 130/3	58/20
101/6 101/6 101/10	5/23 6/8 8/4 9/12 9/15	130/21 153/25	137/15 145/6 145/15	been [158] 1/13 2/6
102/6 104/1 105/8	13/17 13/20 13/24	assurances [3] 125/1	background [10]	3/12 3/14 3/19 4/3 4/6
105/14 105/22 107/15	30/11 32/15 40/3 44/3	143/3 164/2	12/4 32/3 32/6 32/16	4/8 4/12 5/2 5/17 5/19
107/17 107/18 107/23	50/6 51/6 55/1 58/18	assure [4] 92/9	82/11 88/1 106/11	6/1 6/7 6/13 6/17 6/18
107/23 110/4 110/22	63/5 65/25 66/1 73/21	116/11 118/14 125/2	106/12 106/17 106/18	6/23 7/2 7/15 9/20
118/3 123/8 124/17	81/9 81/23 85/16	assured [1] 84/7	badly [2] 59/6 59/6	10/23 11/3 11/9 15/6
129/22 130/14 135/22	85/17 86/20 86/22	asylum [1] 122/4	balance [1] 72/24	16/21 16/22 17/14
139/12 145/7 146/3	87/12 91/21 93/14	at [240]	balanced [1] 63/22	17/14 17/16 17/17
150/9 152/16 152/21	94/4 98/8 98/13	at present [1] 26/9	balances [1] 141/23	17/18 18/8 18/12
153/5 154/4 156/19	104/19 106/3 113/12	attached [2] 2/10 4/6	balancing [1] 76/2	18/23 19/8 19/12
157/2 158/1 158/4	118/5 119/1 146/4	attachment [1] 118/1	Bank [1] 99/10	20/18 23/1 23/23
158/23 159/6 159/20	150/21 160/17 161/11	attended [7] 1/18	bar [1] 89/11	24/14 25/7 26/24
160/12 161/25 162/9	asked [17] 6/21	24/15 41/13 41/15	Baroness [7] 121/8	28/12 30/13 31/6
164/6	13/10 13/13 23/7	122/14 128/22 129/5	127/13 127/17 127/23	37/12 37/17 37/24
area [6] 73/24 73/25	28/17 29/7 29/10	attendees [2] 131/10	128/13 138/11 139/2	38/16 40/1 40/13 41/9
130/24 141/11 156/20	29/20 40/2 43/19	131/12	Baroness Foster [4]	41/13 41/17 41/21
163/6	48/15 86/6 98/19	attending [1] 122/1	121/8 127/13 127/17	42/11 43/1 47/9 49/8
areas [19] 31/21 47/5	113/6 125/1 160/2	attention [6] 49/16	127/23	49/9 49/15 49/17 56/8
68/13 73/20 116/17	160/6	114/18 115/9 117/5	Baroness Foster's	57/19 58/9 59/4 60/2
117/25 143/2 153/19	asking [13] 2/25 12/3	117/15 123/16	[3] 128/13 138/11	62/1 62/1 64/13 64/25
154/21 156/19 157/4	23/16 38/23 51/15	attributable [3] 6/11	139/2	65/2 65/5 68/22 83/20
159/6 159/11 159/14	79/22 101/22 106/5	10/1 10/15	bars [2] 89/2 89/9	84/23 86/16 87/10
160/12 162/8 163/8	107/4 113/25 116/10	audit [1] 140/20	base [9] 32/19 33/25	87/21 88/9 89/6 89/22
163/25 164/1	122/23 125/2	August [11] 2/9 6/5	34/3 34/7 34/8 34/9	90/15 90/18 92/2 93/6
aren't [5] 51/15	aspect [3] 159/9	9/21 9/22 68/2 109/2	34/13 34/17 36/8	94/6 95/2 95/4 96/4
134/10 146/2 151/14	159/15 162/25	126/7 134/25 135/16	based [6] 10/19 33/2	96/10 96/12 96/16
153/6	aspects [12] 18/7	136/11 136/19	35/21 49/22 156/25	96/25 98/19 99/4
arena [4] 38/1 38/2	53/5 96/11 96/12	automatically [1]	156/25	99/11 100/10 101/20
81/18 81/18	96/16 96/16 107/21	146/22	basis [7] 22/18 35/7	102/4 102/23 107/8
arise [1] 34/1	110/22 112/4 154/25	autumn [6] 72/25	44/20 45/9 62/12	107/20 111/22 114/24
arisen [2] 1/6 61/25	156/19 163/24	87/8 88/23 89/8 91/10	64/10 87/18	116/1 116/2 117/25
arises [1] 16/7	Assembly [3] 48/18	111/14	be [302]	118/12 119/2 120/12
arising [1] 101/14	57/16 101/2	autumn 2020 [1]	became [7] 13/4	120/19 121/7 123/4
arose [1] 72/4	Assembly's [1]	88/23	27/18 49/13 49/14	124/8 126/2 126/19
around [29] 5/20	161/18	available [8] 18/22	75/7 76/21 103/21	127/21 128/14 129/15
11/16 20/1 34/7 35/21	assess [1] 14/22	92/3 114/4 139/7	75/7 76/21 103/21	129/16 129/18 131/7
52/3 67/3 68/18 69/12	assessed [1] 71/24	139/12 143/13 143/14	because [70] 1/15	129/16 129/18 131/7
70/1 73/12 79/18	assessment [8] 16/4	159/13	5/19 11/22 18/7 19/7	131/9 132/4 133/18
83/22 86/14 90/1	16/16 17/1 53/16	aware [32] 5/19	20/6 20/10 20/18 23/1	134/2 134/8 134/21
95/11 97/8 101/15	53/18 57/4 65/7 161/8	11/12 14/4 16/20	23/17 29/7 35/9 38/9	135/12 135/24 135/25
101/19 101/21 102/21	asset [2] 141/21	16/22 16/23 17/14	40/5 40/6 46/5 47/23	136/11 137/10 137/25
103/6 103/7 109/2	146/25	17/18 18/8 18/13	49/16 54/22 57/23	139/11 139/13 141/2
116/19 116/21 119/14	assist [13] 22/2	21/15 27/13 27/18	58/19 63/12 63/25	141/3 141/15 142/13
126/4 159/2	22/25 26/16 121/16	31/25 36/23 38/17	65/1 67/1 67/6 67/8	142/16 142/24 143/1
arrangements [16]	125/21 138/7 138/23	40/4 106/1 108/19	72/9 72/12 72/14	143/3 144/9 145/14
16/8 20/21 22/14	139/13 140/11 140/14	112/25 114/14 119/5	73/17 74/4 74/20	145/17 145/24 146/16
27/10 27/15 27/24	142/23 152/6 161/5	119/8 122/9 132/11	75/22 76/24 77/10	148/7 154/17 156/2
28/3 28/6 37/7 40/1	assistance [4] 26/20	133/4 136/15 136/16	79/15 81/25 86/7	156/23 158/10 158/14
46/2 53/20 70/9 81/8	27/7 28/14 38/23	146/8 152/2 152/15	86/16 86/21 89/20	160/12
127/24 138/5	27/7 28/14 38/23	159/18	89/23 90/12 91/23	before [22] 1/5 7/11
array [1] 95/19	assisted [2] 18/9	awareness [5]	92/14 92/23 94/8 96/5	13/20 29/11 37/10
arrest [1] 88/4	47/10	112/20 123/22 124/2	101/1 103/13 107/25	42/8 42/9 42/25 50/11
arresting [2] 68/16	associate [2] 63/18	131/11 141/24	117/3 125/16 127/23	88/16 92/9 97/1 102/5
88/19	93/17	away [5] 69/23 73/9	133/4 133/7 136/4	102/16 103/21 106/11
arrival [1] 23/1	assume [3] 25/7	74/20 94/3 158/24	140/3 142/24 145/6	108/16 109/23 117/4
arrive [1] 85/14	25/13 42/14	assumption [1]	149/10 152/22 155/5	140/12 147/24 155/19
arrived [3] 30/11	42/16	assumptions [12]	156/14 157/1 160/19	beforehand [1]
59/25 60/3	32/18 34/1 34/4 34/7	32/18 34/1 34/4 34/7	162/14 163/1 163/7	138/20
articulation [1] 36/7	34/20 34/22 34/25	34/20 34/22 34/25	become [6] 12/20	began [1] 12/14
as [233]	35/9 35/12 35/18 36/8	35/9 35/12 35/18 36/8	13/10 21/24 26/11	beginning [1] 98/24
			63/11 159/18	begins [2] 9/24 68/19
			becomes [3] 78/13	behalf [11] 1/9 1/14
		B		
		back [26] 6/14 6/24		
		21/18 23/6 23/15		
		24/16 37/4 41/20 50/5		
		55/23 57/6 58/11 61/8		

B	90/24 98/17 106/25 120/20 128/22 136/10 142/1 151/1 156/1 beyond [4] 62/10 151/20 152/4 153/11 big [8] 32/24 33/6 48/11 65/1 65/8 89/17 101/8 155/9 bigger [1] 154/25 bit [24] 11/20 12/3 13/17 13/18 22/12 24/3 36/2 41/21 50/3 51/6 51/13 55/1 61/10 63/5 64/18 65/25 67/4 75/11 88/3 106/5 107/25 117/4 128/9 151/12 blind [1] 20/22 blue [1] 6/1 board [24] 13/21 13/25 14/1 14/3 14/5 14/9 14/11 14/14 14/18 15/5 16/17 16/22 17/25 20/2 20/12 20/17 21/10 21/14 23/8 100/8 109/10 156/3 157/13 162/17 board's [1] 19/25 body [3] 38/21 39/3 40/6 bog [1] 47/22 both [11] 10/9 31/9 39/18 39/24 48/8 98/20 99/5 126/18 143/11 155/7 159/21 bottom [5] 26/4 53/17 70/10 100/15 117/6 bounced [1] 56/11 bound [2] 79/21 143/20 boundary [1] 90/25 BRADY [7] 104/17 104/21 104/22 145/10 160/17 164/8 165/13 break [5] 9/7 48/21 49/1 155/13 155/16 breaker [1] 75/15 Brenda [1] 98/13 Brenda Campbell [1] 98/13 Brennan [1] 71/15 Brexit [1] 17/4 briefed [1] 116/7 briefing [6] 4/2 84/17 112/23 116/25 119/18 161/4 briefings [2] 122/3 122/8 bring [10] 1/22 10/9 15/10 24/10 56/9 56/10 69/5 119/15 121/17 157/12	bringing [5] 18/14 61/15 61/15 77/12 88/1 broad [1] 77/5 broadcast [1] 83/15 broadcaster [3] 76/25 92/23 153/12 broadest [1] 116/14 broadly [3] 109/21 143/4 153/9 brought [7] 5/22 9/15 28/24 31/10 68/8 68/12 108/9 build [1] 110/11 building [1] 17/16 builds [1] 160/8 built [3] 61/19 66/7 154/18 business [14] 14/7 62/13 89/18 149/13 150/13 150/17 150/23 151/3 151/4 151/10 151/14 151/25 152/19 153/13 but [246]	22/20 22/21 22/25 24/1 24/5 24/17 25/7 25/13 26/4 26/13 26/15 28/4 28/4 28/10 28/13 29/12 30/11 30/18 32/15 33/13 33/14 33/19 35/21 37/2 42/3 43/4 43/6 44/4 45/2 45/21 50/8 50/13 51/12 52/18 53/21 54/7 55/15 55/25 56/16 60/17 61/4 61/9 61/19 62/8 62/9 62/14 67/1 67/2 67/19 67/22 69/22 70/23 71/19 72/9 72/11 73/5 75/11 79/20 80/14 80/23 81/1 81/9 83/8 84/8 87/4 88/10 88/11 91/6 93/13 94/2 95/9 96/7 96/17 99/1 100/17 101/14 103/2 103/12 104/12 104/19 105/7 105/10 105/21 105/24 106/5 108/23 112/5 113/15 115/18 115/20 115/22 120/3 121/17 126/9 126/11 126/13 129/1 129/17 130/9 130/13 132/24 135/21 136/20 137/2 137/5 145/9 146/12 149/5 150/9 150/20 150/21 152/6 153/3 154/6 157/4 157/13 159/4 160/17 160/21 161/11 161/20 161/23 162/14 162/23 163/13 164/18 can't [14] 10/4 18/10 40/14 56/9 56/9 62/15 67/10 71/2 81/24 84/7 88/4 94/25 96/5 109/23 candid [1] 26/7 candidly [1] 84/8 cannot [3] 82/1 88/4 157/15 capability [9] 15/22 16/11 18/3 18/4 19/14 20/24 21/3 21/9 21/17 capable [1] 47/24 capacity [8] 8/10 15/7 16/11 17/10 18/19 19/4 73/23 109/11 capture [2] 74/10 95/12 captured [1] 152/21 capturing [1] 147/7 care [2] 46/3 47/4 career [2] 12/6 12/14 careful [2] 81/21 161/11	caretaker [1] 121/4 caring [1] 62/21 carried [2] 2/11 39/25 carry [2] 26/19 27/10 case [26] 4/19 33/25 34/3 34/7 34/9 34/9 34/9 34/13 34/14 34/17 34/18 36/8 36/9 45/3 58/6 64/12 67/17 74/13 108/15 127/22 128/11 134/1 139/6 139/9 139/10 160/4 cases [1] 70/2 casualness [1] 7/2 categories [2] 3/3 94/11 categorisation [1] 151/4 cause [1] 97/12 caused [1] 61/22 causing [1] 51/19 caveats [1] 142/8 CCG [19] 37/15 38/6 39/2 39/10 39/14 39/19 40/5 40/11 40/25 41/3 41/5 41/7 41/13 41/14 41/20 41/22 42/10 43/2 57/12 central [2] 146/22 147/14 centralised [1] 146/17 centrally [1] 157/2 centre [4] 24/24 24/25 25/1 25/5 centres [1] 26/6 centric [3] 36/16 36/20 36/22 certain [7] 39/21 46/15 51/4 65/17 73/14 73/19 84/21 certainly [18] 11/20 21/22 30/1 63/7 63/12 67/23 73/5 85/10 87/7 91/9 126/3 127/8 128/4 136/21 144/8 148/21 155/11 158/25 CG [1] 37/4 chain [6] 26/10 27/19 27/20 50/25 56/8 128/9 Chair [8] 45/14 50/3 83/7 86/5 90/5 99/19 160/16 165/18 chaired [1] 24/4 challenge [4] 62/14 77/25 78/13 110/12 challenged [1] 78/3 challenges [2] 84/13 111/25 Chamberlain [1] 54/10
----------	---	---	--	--

C	15/7 15/21 16/7 19/2 19/9 22/16 23/9 24/3 24/10 24/16 24/25 25/15 26/22 27/15 27/16 28/2 29/1 31/9 31/15 34/10 37/5 37/25 38/2 38/6 39/4 39/25 42/4 51/10 52/15 53/19 63/7 81/20 83/3 84/5 92/22 93/23 95/7 106/7 107/5 107/7 107/10 107/13 108/5 108/24 109/7 109/8 109/19 110/13 111/16 114/20 116/22 118/3 130/4 130/10 144/13 146/12 156/6 156/24 157/13 157/15 161/14 162/2 162/11 162/17 162/21 162/24 163/3 163/11 163/23 clarify [1] 134/4 clarity [2] 38/19 39/8 cleansed [2] 138/22 140/12 clear [51] 7/6 7/8 14/9 20/2 29/6 35/22 36/14 38/16 42/6 49/18 63/6 63/22 66/16 72/11 74/19 76/11 83/24 88/6 89/4 90/19 108/4 108/25 110/24 111/5 115/19 118/22 123/13 123/15 123/16 123/25 124/9 124/10 124/12 124/20 128/14 135/6 142/17 142/17 142/18 144/21 145/7 146/2 146/21 150/15 150/25 151/18 155/3 157/20 162/11 162/13 163/6 clearly [1] 72/17 client [4] 153/23 154/21 154/23 156/25 client-based [1] 156/25 close [5] 21/1 63/10 64/1 64/15 97/16 closed [1] 64/3 closer [1] 34/23 closing [2] 70/13 76/25 closure [5] 52/3 97/4 97/9 97/19 97/21 cloud [2] 154/22 156/25 CMO [6] 66/16 74/9 75/2 75/14 78/2 91/11 co [5] 24/12 99/11 131/6 156/18 163/14 co-opted [1] 99/11 co-ordinate [2] 24/12	163/14 co-ordination [1] 131/6 coalesce [2] 102/21 103/3 coalition [2] 77/8 107/20 COBR [2] 73/15 122/3 code [6] 134/14 143/17 143/18 145/19 156/10 160/10 cognisant [1] 41/7 cohesive [1] 103/5 cohesiveness [1] 64/23 collaboratively [1] 33/1 colleagues [2] 26/2 71/4 colleagues' [1] 115/9 collective [14] 37/3 37/14 39/11 46/17 47/12 48/1 55/10 84/18 86/18 99/8 99/17 101/11 101/18 144/16 collectively [2] 46/13 157/12 come [34] 2/3 6/14 13/9 20/10 21/18 23/22 27/3 34/10 38/9 51/5 63/1 63/5 65/25 68/24 72/22 77/13 84/22 87/25 96/19 102/13 103/3 110/8 121/8 123/9 124/11 125/23 136/4 137/15 137/25 140/25 145/6 150/20 160/22 162/8 comes [4] 10/4 45/15 82/22 100/11 coming [13] 17/12 37/4 50/23 59/21 74/12 80/24 91/7 103/9 110/15 111/1 142/17 159/25 162/3 command [3] 24/11 57/3 163/10 commanded [1] 22/16 commanding [1] 22/22 commenced [1] 136/18 commentary [1] 84/17 commission [1] 46/15 commissioned [1] 116/7 Commissioner [1] 106/25 Commissioners' [1]	109/8 commitment [1] 153/17 commitments [1] 160/10 committed [5] 72/15 146/22 147/13 152/9 152/22 Committee [19] 1/11 1/16 37/25 38/13 38/15 39/7 40/7 40/19 40/25 41/1 46/10 56/24 68/20 75/9 83/21 84/14 111/15 161/18 162/10 communative [1] 33/4 communicate [2] 123/20 148/25 communicated [2] 115/13 116/18 communicating [1] 149/2 communication [4] 114/11 122/22 124/16 151/1 communications [30] 106/3 115/6 117/10 117/12 119/19 120/4 121/10 121/15 121/20 123/3 123/6 123/9 123/11 124/12 124/21 136/8 138/19 144/1 144/4 144/20 146/6 147/17 147/19 148/16 149/18 151/8 152/7 153/2 154/6 155/22 communities [3] 111/2 111/7 111/8 community [9] 27/18 67/8 80/13 81/3 81/25 82/8 89/22 90/8 95/22 complaining [1] 163/16 complete [1] 3/22 completely [2] 41/3 95/3 completes [2] 164/11 164/13 complex [3] 67/4 110/5 155/3 compliance [3] 130/21 130/25 157/23 complicated [1] 148/22 complying [1] 89/19 components [1] 35/5 compound [1] 141/5 compounds [1] 159/4 comprehensively [1] 98/21 compromise [7] 61/18 62/12 65/22	69/4 80/24 99/23 100/1 compromised [1] 90/14 compromises [1] 80/22 concealed [1] 133/19 concept [1] 25/5 concern [28] 5/10 18/16 18/18 19/13 19/16 50/16 54/1 54/14 56/10 62/23 70/16 70/24 73/8 86/3 86/15 88/22 89/2 89/5 90/13 91/9 103/9 134/19 134/21 141/12 159/6 159/10 160/12 160/20 concerned [6] 7/20 17/25 31/4 31/23 57/13 135/7 concerns [15] 28/25 53/22 70/18 73/6 74/2 76/23 87/8 87/13 89/20 89/25 91/2 91/23 95/12 102/9 159/21 concur [4] 133/12 133/21 134/12 153/7 conditions [2] 22/8 110/11 conduct [1] 149/13 conducted [2] 152/19 153/14 conducting [1] 40/12 confidence [7] 56/13 56/15 56/19 57/21 58/3 58/5 101/7 confident [1] 98/5 confines [1] 162/14 confirm [6] 5/11 105/7 105/21 128/11 145/2 148/13 confirmation [3] 4/21 125/4 127/8 confirmatory [1] 145/15 confirmed [1] 4/10 confirming [1] 127/18 confirms [1] 6/6 conflict [1] 164/1 confronted [1] 59/8 conscious [6] 37/17 77/3 86/21 87/13 95/18 147/11 consider [3] 7/21 42/18 113/2 considerable [1] 160/20 considerably [1] 101/11 consideration [10] 42/25 64/11 86/13
----------	---	---	--	---

C	contingencies [28]			
consideration... [7] 86/18 93/6 93/15 94/19 94/24 95/8 144/22 considerations [8] 36/10 92/20 93/7 94/5 96/10 96/12 97/3 97/6 considered [4] 15/5 43/9 119/10 123/18 consistency [4] 141/13 157/1 158/6 162/12 consistent [3] 123/25 138/9 156/21 consistently [1] 140/19 conspicuous [2] 109/13 155/23 constant [2] 83/21 83/23 constantly [1] 78/2 constituency [2] 61/15 162/16 constituents [2] 58/9 76/1 constitute [2] 131/18 147/19 constitutional [5] 52/13 81/7 156/5 157/16 162/14 constitutionally [1] 157/7 constitutions [1] 110/5 consultation [1] 93/12 contact [2] 61/1 119/6 contacted [5] 3/21 3/24 4/4 4/14 29/13 contacting [1] 118/17 contained [1] 144/19 contemplated [1] 52/9 contemporaneously [1] 152/12 content [12] 2/11 8/16 9/3 105/14 133/11 142/5 143/5 145/3 147/2 149/1 152/15 154/17 contents [3] 9/3 105/7 105/21 contested [1] 134/17 context [13] 2/14 24/8 41/5 73/2 82/22 99/1 101/17 103/1 121/22 122/9 142/22 142/22 144/8 context-specific [1] 103/1	13/15 15/7 19/2 19/10 23/9 24/4 24/10 24/25 26/23 27/15 28/2 29/1 31/16 34/10 37/5 37/5 38/1 38/2 38/6 39/4 40/1 92/22 93/24 95/7 162/22 162/24 163/3 163/11 contingency [12] 13/11 15/22 16/8 16/12 18/5 18/20 19/15 22/16 31/10 49/9 49/13 70/9 continue [1] 36/11 continued [1] 109/17 continuing [2] 58/7 68/3 continuously [1] 48/6 contrary [3] 84/17 84/23 89/15 contribute [1] 102/10 contributing [1] 101/24 contribution [1] 101/9 control [13] 24/11 50/18 50/22 52/12 52/21 55/25 100/17 101/4 107/19 163/10 163/14 163/18 163/20 controls [1] 71/21 controversial [2] 53/3 163/21 convened [2] 121/23 140/16 convention [5] 20/1 27/4 50/10 54/20 151/1 conversations [2] 60/25 150/9 convey [1] 7/1 conveyed [4] 24/16 123/12 124/8 124/25 conveys [2] 70/23 148/3 convince [1] 164/3 coo [1] 156/19 coo-ordinated [1] 156/19 cope [1] 18/19 copies [1] 5/12 copy [1] 117/7 core [6] 7/11 18/15 63/2 160/24 162/25 163/24 core participants [2] 7/11 160/24 corollary [1] 162/10 corporate [2] 9/13 150/6 corporately [1] 54/2 correct [145] 8/8 8/9	8/21 9/22 9/23 10/7 10/20 11/6 11/7 12/7 12/15 13/5 14/10 14/20 14/21 15/2 15/3 19/10 19/11 19/17 25/3 25/4 27/11 27/12 28/20 29/19 29/22 32/8 40/9 42/22 44/2 44/8 44/13 44/21 44/22 47/7 47/7 49/25 51/3 52/21 53/15 54/12 55/7 63/17 64/1 64/2 64/4 66/10 66/11 66/14 66/18 68/9 68/10 68/17 73/19 74/13 75/4 75/5 76/4 76/21 78/17 78/18 78/19 79/5 80/3 81/15 81/16 81/23 82/6 82/10 82/12 82/14 83/13 84/21 87/12 87/17 87/19 88/18 91/9 91/22 93/16 100/4 100/9 106/7 106/10 106/13 106/14 106/16 107/2 107/8 108/7 114/9 114/22 115/4 115/8 115/17 115/25 117/13 118/25 119/20 120/10 120/11 120/15 120/21 121/11 121/12 122/17 125/21 125/22 126/2 126/20 126/22 126/23 127/1 128/1 128/17 128/19 128/25 129/7 129/10 130/1 130/7 130/8 130/11 133/10 135/14 135/20 136/9 136/11 137/9 138/1 138/2 138/7 139/20 139/23 140/13 140/14 142/6 146/7 146/20 148/3 150/14 150/19 151/4 151/22 corrected [1] 11/22 correctly [2] 142/12 159/19 correspondence [7] 113/20 114/6 115/4 123/17 141/14 159/22 160/2 cost [2] 69/14 71/23 costs [4] 69/13 69/14 72/16 76/25 could [65] 1/25 2/1 2/25 4/18 5/22 5/23 6/22 6/24 9/15 10/14 10/15 15/10 15/15 19/24 21/3 26/24 28/11 32/19 33/12 33/18 37/16 37/18 47/21 52/20 52/24 53/8 54/22 57/6 58/24	66/9 69/16 69/19 73/4 85/18 86/8 87/10 89/6 90/3 90/20 91/20 93/18 94/4 96/3 96/8 98/1 98/23 101/20 111/3 112/24 112/25 113/5 113/6 113/11 119/10 119/15 119/16 121/14 126/9 136/18 136/24 136/25 137/17 147/19 149/8 162/2 couldn't [2] 59/19 79/11 Council [2] 92/10 106/25 councils [1] 92/4 counsel [7] 1/3 8/3 104/18 112/10 165/3 165/8 165/15 counterview [1] 71/15 couple [4] 21/21 22/7 56/9 107/21 course [12] 13/10 20/24 48/22 54/19 58/6 62/4 94/2 99/12 110/6 110/22 131/22 161/6 cover [5] 5/8 47/8 61/11 65/8 133/13 covered [7] 42/12 107/22 107/23 121/14 133/8 140/20 156/4 covering [3] 114/19 116/9 117/19 covers [3] 22/4 94/12 95/19 Covid [23] 2/4 13/14 16/15 17/23 18/24 19/22 20/4 21/13 27/1 28/7 29/21 35/17 49/17 49/21 52/22 53/2 53/5 71/23 71/25 87/4 98/14 116/17 153/2 Covid Inquiry [2] 2/4 116/17 Covid-19 [1] 16/15 create [3] 64/18 108/23 162/18 created [2] 12/24 149/12 creatures [1] 41/10 crisis [4] 55/25 101/3 102/15 102/16 critical [3] 49/6 71/1 162/25 critically [2] 110/22 111/10 criticise [1] 82/1 criticism [2] 35/3 95/14 cross [15] 14/11 31/7 39/6 43/13 43/16	80/13 81/3 81/25 113/14 131/4 140/16 162/9 162/9 163/9 163/22 cross-cutting [6] 39/6 43/13 131/4 162/9 163/9 163/22 cross-departmental [2] 31/7 113/14 crystallised [1] 59/17 CSA [1] 78/2 cultural [1] 154/25 culture [1] 155/8 cumulative [1] 66/9 current [1] 139/13 currently [1] 111/6 curve [1] 149/16 cushion [1] 65/15 custody [1] 46/3 customary [1] 10/2 cut [1] 95/15 cutting [6] 39/6 43/13 131/4 162/9 163/9 163/22
				D d'Hont [1] 51/19 damaging [2] 60/21 84/6 data [5] 71/13 121/10 126/2 135/18 136/13 date [9] 13/7 28/11 55/15 59/19 103/17 103/18 105/4 105/4 135/11 dated [3] 2/9 6/5 30/17 dates [5] 4/22 29/12 29/25 159/22 159/24 David [23] 31/9 41/22 42/12 50/14 52/1 53/22 53/23 54/21 58/16 61/21 63/22 64/23 83/8 85/13 98/17 98/25 99/4 100/13 101/15 107/6 108/7 108/12 109/1 David Sterling [2] 41/22 52/1 David's [3] 53/17 54/19 103/8 day [13] 7/21 34/24 35/13 35/16 36/20 70/2 71/7 74/17 85/11 99/10 121/3 121/5 164/12 day one [2] 35/13 35/16 days [9] 28/1 43/25 69/23 73/9 74/20 80/10 100/8 100/12 102/5 deal [17] 12/1 13/23 16/11 17/4 17/17 18/3

D	default [1] 37/3	125/1 140/4 141/4	dialogue [2] 91/3	directly [1] 18/11
deal... [11] 18/4 29/4	defeat [1] 82/18	141/25 142/20 143/4	96/13	disability [5] 93/13
43/6 50/1 68/6 68/25	define [1] 154/5	145/1 148/8 149/12	did [48] 8/15 11/8	95/18 96/5 96/11
74/24 98/19 110/9	defined [2] 39/14	155/23 156/1 161/13	12/20 12/22 13/19	96/16
111/20 135/2	156/10	162/1 163/7 163/19	21/4 22/6 23/8 23/11	Disability Action [1]
dealing [9] 9/19 13/4	definitely [2] 32/22	163/20	23/12 28/18 28/25	93/13
16/3 20/25 86/14	60/5	depend [1] 66/23	30/7 30/12 32/18	disabled [1] 95/22
98/21 122/4 130/4	definition [1] 144/1	dependent [1] 22/14	34/20 36/21 36/21	disagree [2] 40/14
155/4	degree [1] 76/8	depends [1] 87/22	38/14 40/4 40/7 48/8	96/1
dealt [6] 85/13 92/18	delayed [1] 104/10	deputy [29] 1/17	56/4 60/3 63/11 64/6	disagreement [1]
95/1 119/19 137/18	deleted [2] 7/16	50/17 52/23 53/6	69/17 71/7 76/2 76/6	132/2
140/3	138/19	53/12 54/1 54/15 58/4	84/21 85/1 86/3 90/10	disappointing [1]
death [2] 71/23	deleting [1] 145/11	99/5 100/2 100/13	90/10 99/9 111/24	26/2
109/17	deletion [1] 143/5	110/15 110/20 111/19	114/17 115/17 118/5	disclose [1] 143/16
deaths [4] 67/9 71/23	deliberate [1] 147/11	112/2 116/5 117/1	118/7 135/20 141/7	disclosed [5] 5/19
71/25 74/22	delineation [1]	117/16 119/12 121/23	142/18 145/10 147/18	142/9 144/9 159/8
debate [3] 69/4 69/7	150/25	126/16 128/6 128/15	159/16 164/7	159/11
72/5	deliver [2] 18/23	137/17 139/9 139/21	didn't [27] 6/14 22/10	disclosure [10] 1/6
December [2] 85/21	163/23	139/22 147/5 163/15	29/5 30/24 31/23 32/5	3/5 3/11 3/22 4/15 5/3
109/16	delivered [3] 56/18	descending [1]	32/15 35/10 35/11	11/13 142/11 159/7
December 2020 [1]	57/20 141/15	112/14	40/5 43/14 43/15	159/23
85/21	delivering [2] 47/24	describe [3] 69/7	43/25 53/13 61/2	disconnect [1]
decide [3] 63/9 65/16	48/17	77/7 77/24	63/15 64/1 65/20 78/1	142/10
80/13	delivery [5] 56/13	described [2] 52/2	93/5 95/15 96/13	discontinuity [1]
decided [6] 39/6 64/9	56/15 57/13 57/20	77/19	109/20 114/7 114/15	110/6
65/8 79/3 132/18	58/5	deserve [1] 154/15	133/10 163/16	discovered [1]
132/25	demonstrates [1]	designed [2] 81/20	difference [4] 40/16	133/19
decision [42] 31/18	53/10	163/4	57/6 109/22 119/9	discretion [1] 10/2
35/22 36/12 37/3	Denis [1] 108/16	designing [1] 20/21	differences [1] 90/6	discuss [3] 26/14
37/14 38/15 38/20	department [45]	20/21	different [48] 13/2	116/17 151/10
39/3 39/3 39/17 39/23	12/24 13/6 14/4 16/25	6/18 6/20 141/6	21/8 24/6 41/3 41/10	discussed [14] 3/10
40/6 53/4 57/7 64/13	24/9 25/2 25/16 25/16	destroy [3] 120/23	51/16 51/25 54/14	42/14 97/4 97/17 98/4
64/15 65/4 69/5 70/11	26/8 31/20 38/22	121/1 123/14	55/13 55/19 56/11	99/14 128/23 129/5
79/8 81/13 82/1 84/6	43/14 43/15 44/4 45/5	destroyed [2] 114/8	61/20 61/25 64/14	132/3 132/5 133/11
84/14 84/18 85/12	45/17 50/5 50/23 51/2	120/10	68/24 77/2 77/8 90/12	134/8 134/17 134/23
90/25 97/16 99/8	51/21 52/21 52/24	destroying [1]	95/20 96/17 96/24	discussing [4] 57/10
99/17 99/23 99/25	53/14 56/7 59/22	121/11	98/22 99/6 107/6	129/17 151/13 152/24
101/12 101/18 103/13	60/20 71/16 71/17	destruction [1] 119/9	107/10 107/17 107/24	discussion [8] 43/19
112/13 142/24 144/6	95/1 114/2 116/3	detail [8] 31/1 36/2	108/7 112/7 123/20	43/23 54/23 84/25
144/8 146/25 147/7	118/19 124/11 138/24	46/17 47/14 47/22	124/1 124/17 129/23	91/19 150/12 151/18
147/11	141/10 148/6 156/7	60/15 61/11 115/2	130/23 130/23 138/13	153/6
Decision making [1]	156/8 156/9 156/9	detailed [1] 30/25	138/20 141/3 141/18	discussions [8]
36/12	156/11 156/14 157/7	determining [1] 15/1	143/21 154/9 156/1	59/11 111/23 112/19
decision-making [27]	157/21 157/24	detrimental [1] 28/10	156/5 156/11 157/16	116/4 151/23 151/25
31/18 35/22 37/3	departmental [27]	developed [3] 49/22	157/23 158/2 158/2	152/21 153/16
37/14 38/15 38/20	1/24 13/21 13/25 14/1	111/20 156/15	differentiated [1]	disproportionate [2]
39/3 39/17 39/23 53/4	14/5 14/9 14/11 14/18	developing [1] 95/7	138/13	93/2 93/3
57/7 70/11 84/6 84/14	16/17 16/22 20/12	development [2]	differs [1] 25/16	dispute [2] 128/22
84/18 85/12 90/25	20/17 24/22 30/13	97/15 98/4	difficult [20] 39/5	131/23
99/8 99/17 99/23	30/21 31/7 43/13	device [4] 137/24	52/3 52/4 52/7 59/1	disruption [1] 122/1
99/25 101/12 101/18	43/16 48/19 62/10	138/11 140/22 142/22	72/13 72/14 75/7	distance [2] 70/21
103/13 112/13 144/6	108/22 113/14 115/23	75/12 75/21 80/18	80/19 81/2 83/15	94/5
147/7	131/1 131/4 131/5	80/19 81/2 83/15	85/14 102/15 111/14	distinct [1] 144/19
decisions [20] 31/13	140/16	85/14 102/15 111/14	153/4 158/20 164/4	distinction [1]
37/23 39/8 39/19	departmentals' [1]	153/4 158/20 164/4	difficulties [2] 88/11	124/20
39/20 40/6 40/13	119/7	difficulties [2] 88/11	111/18	distinctions [1] 45/4
40/20 40/21 40/24	departments [40]	111/18	difficulty [2] 88/13	distinguishing [1]
41/2 53/2 53/7 65/1	14/1 18/14 25/8 25/17	112/15	112/15	20/3
65/12 65/22 91/6	25/18 26/6 27/14 31/1	Digital [1] 106/24	digital [1] 106/24	diverse [1] 77/14
113/3 147/4 147/6	33/1 46/14 47/25	direct [3] 107/14	107/22 156/6	divested [1] 108/11
declaration [1] 59/11	51/20 56/2 56/5 60/16	107/22 156/6	directed [1] 163/5	divide [1] 76/22
deep [2] 154/12	101/5 114/1 116/21	direction [1] 107/19	direction [1] 107/19	division [2] 77/6
154/16	118/13 119/4 122/7			107/15
	122/9 123/24 124/22			divisions [1] 111/20

D	149/1 150/21 150/22 150/25 155/25 164/4	drafting [3] 30/4 43/8 100/12	effective [4] 29/3 68/15 89/21 113/1	112/17
do [91] 8/10 8/23 8/24 9/8 13/20 20/24 22/14 23/24 26/10 31/11 34/13 38/24 40/9 41/6 42/23 46/5 46/11 47/2 48/11 49/19 52/15 54/24 58/24 60/18 60/19 63/13 63/15 64/5 64/13 64/13 65/25 66/13 67/3 68/6 68/18 69/8 77/17 77/18 77/19 78/4 79/21 81/1 81/1 81/6 82/22 87/4 87/7 89/15 89/16 90/20 91/1 92/5 92/11 93/10 93/11 93/23 94/17 96/7 96/9 96/9 97/15 100/20 100/21 103/2 105/4 105/19 105/20 105/21 107/13 113/15 116/6 122/24 125/3 133/1 134/20 140/7 140/9 145/12 145/18 151/3 151/9 151/22 152/4 152/24 157/4 157/9 158/5 159/1 162/4 162/14 163/25	doing [16] 22/21 26/8 31/2 31/20 41/3 53/14 55/19 56/2 56/5 60/20 61/8 95/6 101/6 102/17 103/14 153/20	draw [4] 22/20 42/17 117/5 159/4	effectively [31] 12/20 16/11 28/22 30/6 33/15 43/15 44/12 46/21 49/12 50/17 52/19 54/17 57/25 63/11 64/21 64/24 65/2 66/16 72/3 76/19 76/21 77/15 81/6 81/13 94/21 110/9 125/13 127/15 132/16 138/22 140/3	enable [1] 31/12 enabled [1] 48/14 enacted [1] 27/24 encompass [1] 30/8 encompassed [2] 43/16 44/2 encompasses [1] 94/16 encourage [2] 88/13 92/12
doable [1] 87/24	DoJ [2] 85/23 86/1	driven [2] 117/15 123/16	effort [3] 28/11 31/14 47/12	end [13] 5/10 7/21 10/25 23/23 27/3 35/1 40/7 43/8 44/19 79/24 80/4 109/2 109/15
Dobbin [9] 7/14 23/7 49/3 83/2 98/20 99/15 133/25 155/18 162/11	don't [70] 6/12 20/1 22/4 30/21 31/3 32/2 32/3 36/2 37/16 38/7 38/8 40/1 40/2 41/19 42/2 43/5 45/20 47/10 49/7 52/9 52/10 52/15 54/21 58/25 59/10 60/1 60/1 60/1 62/7 62/9 64/12 69/9 71/3 72/8 72/22 73/13 74/6 74/10 76/15 76/19 76/20 76/23 77/4 78/1 78/8 78/9 81/3 89/11 91/17 94/7 97/5 97/5 97/13 101/19 120/17 134/24 135/9 137/14 140/7 142/9 149/15 151/7 151/10 151/20 152/17 153/25 161/12 163/13 163/18 164/6	drawing [3] 31/16 114/18 115/9	efforts [5] 7/3 7/9 62/11 141/2 141/15	ended [1] 138/5 enforce [4] 87/3 88/14 90/11 92/12 enforced [1] 87/16 enforcement [16] 87/1 87/20 87/23 88/8 89/7 89/20 89/21 90/2 90/19 91/5 91/13 91/19 91/22 92/3 92/5 92/6
DOC [1] 24/22	done [19] 17/14 19/12 57/22 59/14 62/13 63/14 64/6 93/18 93/18 94/23 96/3 96/8 96/25 101/20 125/3 136/12 138/8 142/21 152/17	drawn [2] 117/15 123/16	Egress [1] 4/6	enforcing [2] 87/9 88/17
doctrine [1] 38/5	door [2] 62/9 62/10	due [1] 13/10	eight [3] 116/21 120/19 122/6	engage [1] 92/11 engaged [1] 161/7 engagement [3] 112/7 112/24 142/13
document [28] 5/23 15/12 30/17 30/22 31/8 31/10 33/10 33/15 36/1 48/3 48/8 55/19 66/3 69/16 73/1 74/17 85/19 103/14 103/17 103/21 104/13 116/20 116/25 117/6 148/3 148/7 154/19 154/20	double [1] 97/18	DUP [1] 51/18	either [5] 77/4 85/22 93/1 140/11 152/3	engineer [1] 106/13 England [1] 73/23 English [1] 113/9 enormous [1] 16/20 enough [2] 19/5 108/4
documentation [3] 36/21 113/16 116/15	double check [1] 97/18	duration [1] 51/16	elderly [1] 94/16	enquiring [1] 21/10 enquiry [1] 128/6
documents [19] 3/3 3/4 3/12 3/15 3/19 3/25 4/16 10/10 23/25 32/18 35/6 43/7 67/22 87/5 117/8 118/20 119/9 149/11 156/12	doubt [4] 11/13 59/24 63/4 81/19	during [12] 68/1 93/7 109/6 110/17 111/21 127/22 127/24 130/19 133/11 134/17 136/13 136/17	elect [1] 61/14	ensuring [4] 114/7 119/24 125/13 153/13
document [28] 5/23 15/12 30/17 30/22 31/8 31/10 33/10 33/15 36/1 48/3 48/8 55/19 66/3 69/16 73/1 74/17 85/19 103/14 103/17 103/21 104/13 116/20 116/25 117/6 148/3 148/7 154/19 154/20	down [15] 33/18 35/2 35/8 35/11 35/15 38/9 47/23 53/4 70/8 76/25 120/3 121/24 139/4 150/20 161/22	duty [1] 79/20	electronic [1] 117/10	entire [2] 19/1 82/8 entirely [3] 62/8 100/7 100/7
documentation [3] 36/21 113/16 116/15	download [1] 152/14	dying [4] 58/22 62/15 62/17 162/1	element [1] 63/20	entities [1] 107/17 entity [1] 156/15
documents [19] 3/3 3/4 3/12 3/15 3/19 3/25 4/16 10/10 23/25 32/18 35/6 43/7 67/22 87/5 117/8 118/20 119/9 149/11 156/12	Dr [3] 29/16 108/16 109/6	dynamic [1] 86/14	elements [2] 66/23 107/23	environment [2] 142/25 163/11
Dr Denis McMahon [1] 108/16	Dr [3] 29/16 108/16 109/6	E	else [7] 42/14 61/17 72/23 93/9 103/2 118/8 164/7	environmental [1] 92/4
Dr Jenny Pyper [1] 109/6	Dr Denis McMahon [1] 108/16	each [25] 24/8 25/1 33/7 33/7 33/8 36/4 46/18 48/4 55/2 75/24 77/8 95/1 107/18 107/18 116/3 118/13 137/7 137/15 140/17 156/14 157/7 157/21 157/24 159/16 159/20	email [43] 2/9 3/20 4/7 5/2 5/25 6/5 10/5 10/10 10/15 10/19 24/2 26/10 27/19 27/20 33/16 50/6 50/10 50/14 50/24 51/7 51/13 54/5 58/16 61/23 64/24 69/20 70/8 70/23 71/3 71/10 98/16 98/24 100/11 102/17 114/19 117/10 121/19 126/10 126/12 128/9 146/8 146/21 147/13	environ [2] 112/23 164/4 envisaged [2] 43/11 81/19
Dr McCormick [1] 29/16	Dr Jenny Pyper [1] 109/6	earliest [1] 135/4	emailed [3] 2/18 2/23 3/18	EOC [1] 25/4 EP [1] 40/2
draft [12] 32/17 43/19 55/10 99/13 99/14 100/5 102/5 103/14 103/17 103/20 129/11 129/12	Dr McCormick [1] 29/16	early [10] 7/16 28/10 31/12 43/25 59/11 59/22 66/15 69/20 123/2 164/13	emails [5] 30/1 119/23 126/8 146/5 146/12	epidemiological [1] 64/10
drafted [8] 31/5 31/6 32/1 32/16 33/10 34/3 37/11 43/4	Dr Jenny Pyper [1] 109/6	easiest [1] 136/22	embarrassing [1] 158/21	
		easily [2] 103/10 150/10	emergency [21] 16/12 17/11 18/4 20/13 20/14 20/21 20/23 25/5 32/24 33/4 33/6 39/11 39/15 40/19 41/4 41/8 53/1 62/15 161/23 161/25 163/17	
		economic [2] 36/18 71/24	emerges [1] 77/21	
		economy [9] 65/14 69/3 69/15 69/24 71/16 71/18 72/23 75/24 76/24	emerging [2] 42/6	
		ECT [2] 93/21 109/24		
		edged [1] 40/21		
		edit [1] 134/13		
		education [7] 61/22 70/13 75/23 97/12 101/15 101/23 103/7		
		effect [12] 40/17 66/8 66/10 66/20 79/12 93/2 125/5 125/5 137/7 142/19 143/4 144/17		

E	29/1 45/23 47/3 47/3 47/15 48/4 48/7 88/19 93/12 122/23 134/11 150/11 157/24 158/16	expectation [1] 125/3	158/13 158/17	138/24 148/6 156/8 156/8 156/11 156/14
equalities [1] 92/24		expectations [1] 141/14	factor [4] 90/15 90/18 97/16 101/25	find [13] 21/23 30/12 30/24 40/5 73/8
equality [6] 92/19 93/6 93/25 94/5 95/11 97/2	examples [2] 56/9 84/19	expected [3] 111/15 112/8 135/3	factors [1] 155/9 factory [6] 129/16 132/5 132/10 132/20 133/18 135/12	102/12 102/14 110/24 111/17 112/5 112/21 136/12 160/20
equally [2] 50/21 114/19	exception [3] 26/7 121/8 139/1	experience [5] 16/7 22/4 33/3 75/22 115/1	facts [2] 133/23 134/9	finding [1] 102/16
equivalent [1] 10/17	exceptional [1] 154/5	Experienced [1] 32/12	factual [2] 122/7 134/2	fine [6] 15/19 40/20 50/13 55/18 88/19 91/2
Es [4] 88/7 88/8 88/11 90/20	exchange [3] 50/6 61/23 98/16	Expert [1] 106/22	factually [1] 93/16	fine-tuned [1] 40/20
essential [1] 70/9	excised [1] 158/18	expertise [2] 21/19 28/19	failed [3] 144/15 153/8 154/11	finish [1] 49/5
essentially [2] 25/3 31/5	excluding [1] 154/3	explain [10] 5/12 5/13 5/16 13/24 28/4 75/11 88/10 88/13 92/11 94/3	failure [2] 96/19 101/10	firm [1] 52/11
establish [1] 26/6	excuse [1] 11/15	explanation [1] 81/4	fair [15] 30/10 40/9 43/22 53/15 53/18 54/20 76/18 80/7 81/23 89/10 101/9 103/19 103/23 128/21 138/8	firmly [2] 151/14 151/25
established [1] 25/10	executive [88] 1/11 1/15 1/20 1/24 2/4 2/16 3/9 4/11 5/1 8/21 10/5 10/6 11/2 11/22 12/5 13/8 13/11 14/10 14/12 14/20 14/23 15/2 16/10 31/12 31/17 37/4 37/15 37/25 38/5 38/13 38/15 38/22 38/25 39/7 39/22 40/7 40/15 40/18 40/25 41/1 41/6 41/7 43/18 43/24 43/25 44/14 46/9 46/10 47/22 48/10 53/3 53/7 56/24 57/7 57/9 61/1 61/14 65/23 68/19 72/6 72/13 75/9 78/1 83/16 83/21 84/14 97/18 99/7 100/1 100/17 101/19 101/21 103/12 105/1 108/9 111/15 112/2 112/8 112/24 112/25 121/25 138/23 139/19 144/11 158/11 162/8 162/10 162/18	explicit [2] 123/15 154/3	fail [6] 16/8 61/20 118/7 118/10 144/1 152/23	first [97] 1/15 1/17 3/9 6/6 9/12 21/21 26/5 31/5 34/24 43/7 50/14 50/17 50/20 51/6 52/23 52/23 53/6 53/6 53/12 53/12 54/2 54/15 57/17 58/4 58/4 61/24 63/8 66/14 67/15 69/25 70/10 83/17 85/21 86/25 87/12 97/19 97/21 99/5 99/5 100/2 100/2 100/13 100/14 100/25 104/25 105/12 106/5 107/4 108/20 110/14 110/15 110/20 110/20 111/19 111/19 112/1 112/2 115/22 116/5 116/5 116/6 117/1 117/1 117/16 117/16 119/12 119/12 121/23 121/24 123/11 123/19 126/16 126/16 127/9 127/11 127/12 128/2 128/7 128/15 129/11 129/12 137/4 137/5 137/17 139/6 139/9 139/21 139/21 139/22 139/22 147/5 147/5 153/14 159/6 159/9 163/15 163/15
ethics [4] 134/14 145/19 156/10 160/11	Executive Office [5] 2/16 8/21 14/23 105/1 139/19	explores [1] 98/9	fairly [2] 40/21 98/4	First Minister [24] 50/20 52/23 53/6 53/12 57/17 58/4 99/5 100/2 100/13 110/14 110/20 111/19 112/1 116/5 117/1 117/16 119/12 121/23 126/16 127/12 128/2 139/21 147/5 163/15
EU [10] 13/5 13/6 13/8 21/7 23/24 27/2 28/18 29/18 32/11 35/18	executives [1] 163/24	explored [1] 7/19	fall [6] 16/8 61/20 118/7 118/10 144/1 152/23	First Minister's [3] 127/9 137/5 139/6
EU exit [9] 13/5 13/6 13/8 21/7 23/24 28/18 29/18 32/11 35/18	exhausted [1] 88/9	express [1] 91/2	fallen [2] 118/8 125/8	First Ministers [1] 139/22
even [15] 16/9 32/4 32/5 49/22 51/23 59/20 59/21 60/21 61/16 98/1 110/16 152/22 159/25 161/7 164/1	exist [7] 4/20 6/12 31/24 34/21 35/10 36/21 88/22	expressed [6] 24/15 54/1 71/15 84/24 91/5 99/5	falling [1] 61/8	fit [1] 92/24
event [1] 150/12	existed [4] 35/5 35/12 35/17 149/6	expressly [3] 10/19 119/19 148/18	familiar [8] 15/13 30/22 40/4 44/6 44/11 45/4 92/16 114/25	fixed [1] 103/10
events [3] 109/23 151/2 159/4	existence [3] 6/10 10/1 10/14	extent [5] 91/18 103/14 122/21 135/17 140/24	families [2] 75/23 154/14	fixing [2] 151/19
eventually [7] 13/3 28/24 34/6 41/24 56/21 64/15 75/1	existing [2] 49/20 122/5	extra [2] 80/6 94/19	far [10] 3/5 7/18 11/20 19/15 23/20 31/4 31/23 31/25 78/8 136/17	
eventuate [1] 43/14	exists [1] 81/7	eye [1] 102/6	fast [1] 117/3	
ever [6] 72/22 78/2 78/8 81/17 93/22 96/9	exit [12] 13/5 13/6 13/8 17/17 21/7 23/24 28/18 29/18 32/11 35/18 79/14 79/15	face [1] 18/1	fatality [2] 45/1 45/3	
every [9] 31/20 60/15 60/20 84/25 89/11 94/17 139/15 140/22 146/21	expect [6] 7/19 62/8 62/9 62/16 131/13 163/23	faced [1] 163/16	fear [3] 17/9 19/5 54/8	
everybody [1] 164/14		facilitate [1] 147/9	fearing [1] 84/8	
everyone [6] 22/20 60/17 150/2 154/20 160/24 164/17		facilitated [1] 122/5	fears [1] 86/7	
everything [5] 20/7 47/9 144/7 162/3 163/7		fact [79] 1/9 1/21 3/11 3/14 4/1 5/10 5/20 6/7 6/18 6/19 8/7 9/13 10/9 10/22 10/25 11/6 11/15 11/23 12/5 19/8 20/14 28/3 29/3 29/23 37/12 40/24 41/17 43/2 47/15 58/1 59/7 65/12 67/13 68/7 71/8 71/8 71/9 71/14 73/12 73/14 76/5 78/10 83/20 89/8 91/21 93/11 94/5 97/11 98/24 100/11 102/4 102/18 103/3 107/5 109/18 115/5 115/18 117/11 119/13 120/12 126/2 127/2 127/21 129/8 132/4 133/18 133/23 134/8 135/11 136/3 136/11 137/24 147/19 149/23 151/12 155/20 158/9	feature [3] 83/21 86/11 101/18	
evidence [22] 6/15 12/2 42/6 50/15 64/23 83/8 83/20 84/1 84/19 97/8 97/9 99/19 108/20 123/5 124/14 135/23 136/17 145/1 145/10 145/13 152/6 162/23		February [8] 2/17 8/14 9/1 9/21 15/6 41/13 111/5 120/6	February [8] 2/17 8/14 9/1 9/21 15/6 41/13 111/5 120/6	
evolving [2] 59/19 59/20		feed [1] 25/2	feed [1] 25/2	
exactly [3] 18/24 20/5 99/25		feeling [2] 50/18 57/2	feel [1] 74/6	
example [15] 27/9		fell [5] 65/16 94/21 94/22 95/2 139/17	feeling [2] 50/18 57/2	

F	79/22 79/24 79/25 80/4 80/9 80/10 88/7 four days [1] 80/10 four Es [1] 88/7 four weeks [2] 79/25 80/4 four-week [3] 79/11 79/22 79/24 fragmented [1] 156/17 framework [16] 13/11 39/12 39/14 44/10 55/10 70/11 92/25 102/19 103/4 123/22 153/24 156/12 157/22 158/5 162/22 162/24 frameworks [3] 111/11 112/23 156/13 frantic [1] 113/5 free [2] 26/6 104/3 frequently [1] 124/3 fresh [1] 100/25 Friday [3] 1/1 42/12 157/18 frightened [1] 58/19 front [9] 8/11 8/23 17/11 20/14 103/4 104/24 105/3 105/4 105/19 frozen [1] 15/18 frustrated [1] 50/21 fulfilling [1] 160/10 full [12] 8/4 11/12 41/24 49/15 53/7 96/19 104/19 133/5 133/23 134/9 134/22 159/13 fulsomeness [1] 142/15 functioning [1] 112/14 fundamental [7] 38/5 39/1 63/2 99/17 99/21 101/13 143/24 fundamentally [2] 21/8 91/1 funeral [1] 1/17 furlough [2] 65/10 65/14 further [17] 7/23 16/9 36/1 54/22 70/8 80/2 80/14 101/11 116/16 117/5 120/3 120/6 133/6 134/3 135/18 136/5 136/19 future [5] 17/9 18/25 19/24 22/22 95/10 Féin [2] 51/17 63/13	gave [4] 48/10 50/15 64/23 108/20 general [3] 57/5 84/5 137/16 generalising [1] 57/1 generality [1] 152/20 generally [4] 84/20 138/3 138/15 147/24 generate [1] 47/12 genesis [1] 43/18 geographical [2] 73/19 73/24 get [27] 14/16 46/4 46/16 47/13 47/21 54/9 57/23 59/10 60/3 62/13 68/6 79/8 80/23 81/5 81/24 90/3 91/17 97/11 99/7 100/17 102/8 103/10 133/5 154/11 154/13 160/22 164/2 gets [2] 146/22 164/17 getting [6] 28/16 56/20 65/18 67/9 71/13 131/3 Givan [1] 127/13 Givan's [1] 128/2 give [11] 8/4 16/1 45/13 46/12 46/17 84/19 96/15 104/19 117/24 144/16 158/19 given [27] 4/12 6/23 21/16 28/19 32/15 37/17 37/22 37/24 38/4 57/15 86/8 93/6 94/6 94/20 95/20 113/3 116/15 139/7 140/15 140/24 141/1 141/2 142/19 143/4 150/11 158/25 161/21 giving [3] 40/17 136/17 161/1 global [1] 122/1 go [65] 6/4 6/22 6/24 15/15 22/6 22/22 23/25 25/24 26/10 30/6 33/12 36/1 36/12 38/6 38/10 43/4 44/3 44/4 44/7 48/8 52/4 54/3 54/16 54/22 57/6 61/14 66/1 67/14 67/22 67/24 69/16 69/19 71/10 71/14 73/4 76/1 77/9 80/23 88/7 88/16 89/15 93/22 95/5 98/23 100/22 104/3 109/17 115/18 115/20 117/4 118/15 119/16 126/8 126/10 127/7 128/9 136/24 136/25 137/5 137/14 137/17 140/22 151/20 158/24 162/24	goes [4] 10/25 11/21 80/9 115/19 going [86] 1/4 12/1 13/17 17/19 19/21 20/12 20/19 21/11 23/5 23/6 23/10 23/13 27/22 29/3 30/21 38/21 40/21 42/19 43/22 44/3 46/11 46/12 47/19 47/23 48/18 50/1 50/5 54/16 57/23 58/18 59/23 60/15 62/24 63/1 63/5 64/18 64/19 67/7 67/16 69/18 70/8 70/19 72/13 72/14 72/22 80/17 80/17 83/11 84/1 84/9 84/25 87/5 88/24 89/15 89/24 90/3 91/21 94/3 95/12 100/18 101/12 102/10 102/15 106/3 107/25 112/20 113/5 113/19 117/3 117/22 118/5 118/22 119/1 120/16 124/17 125/17 126/8 128/10 130/3 134/11 137/2 138/15 147/13 157/12 161/22 164/12 gone [6] 5/17 16/21 59/5 59/6 107/25 141/3 good [11] 21/16 22/23 41/21 65/22 69/6 75/18 81/24 92/13 155/12 157/18 164/17 got [32] 29/25 33/6 34/6 39/22 52/5 56/20 57/24 63/24 63/24 64/21 65/18 71/5 75/22 77/10 77/11 78/2 79/23 79/24 79/24 81/21 86/17 89/17 89/18 100/25 101/16 102/18 103/4 103/8 104/24 109/25 143/3 161/11 gotten [1] 67/20 governance [13] 14/2 14/6 14/16 44/10 118/10 118/11 141/20 144/7 155/21 157/6 157/8 157/10 162/25 government [15] 15/7 53/1 54/8 112/4 114/1 115/14 116/2 116/3 120/5 123/10 141/8 147/18 153/13 162/20 163/18 government's [1] 106/21 grade [1] 25/14	granular [2] 31/1 47/14 granularity [2] 47/2 60/19 grapple [1] 58/11 grateful [10] 4/15 4/18 7/24 98/20 105/25 121/18 155/14 160/14 164/8 164/14 great [2] 89/13 98/19 greater [6] 52/21 64/22 68/19 69/12 71/21 98/1 Griffith [4] 126/14 127/8 127/14 128/10 grounded [1] 34/8 group [22] 24/11 24/12 29/1 37/5 42/13 91/19 91/22 92/6 94/8 94/17 95/17 106/22 109/24 116/18 130/17 130/18 130/20 130/21 131/1 131/5 135/2 140/16 groups [7] 93/12 93/25 94/19 95/11 96/17 106/19 131/7 guess [11] 112/19 131/3 134/24 141/11 142/20 143/10 144/8 153/20 154/2 159/12 163/22 guidance [24] 67/2 110/19 115/14 115/18 115/21 115/22 116/1 117/7 117/7 117/9 119/2 123/23 125/6 141/2 143/17 144/17 145/20 147/17 149/20 152/13 155/2 155/24 155/24 156/3 guide [1] 148/21 guilty [1] 86/12
	G		H	
fixing... [1] 152/4 flagged [2] 135/2 135/4 flagging [1] 119/23 flare [1] 20/12 flashing [1] 48/14 flexibility [1] 153/20 flow [1] 44/12 flu [2] 49/17 49/23 FM [1] 85/21 focus [6] 20/11 26/9 42/21 60/13 94/6 108/21 focused [1] 53/2 focusing [4] 21/18 60/8 61/1 153/11 FOI [4] 142/8 143/13 151/5 153/10 follow [1] 145/9 followed [2] 81/24 103/18 following [2] 116/23 160/2 food [1] 46/1 foot [2] 27/15 29/3 fora [1] 42/11 force [1] 95/8 foresaw [1] 117/9 foresees [1] 148/14 forethought [1] 95/24 forever [1] 67/11 forgetting [1] 139/15 forgive [11] 28/18 30/17 38/3 38/8 62/18 63/19 81/23 105/5 108/3 109/21 139/14 forgotten [1] 92/13 form [2] 100/6 132/19 formal [8] 42/24 97/11 116/1 131/18 141/1 144/6 152/15 159/8 formats [2] 48/18 149/11 former [2] 129/15 130/1 forum [5] 37/6 39/10 153/14 153/16 157/10 forward [2] 80/25 111/24 forwarded [3] 114/15 121/1 146/23 Foster [4] 121/8 127/13 127/17 127/23 Foster's [3] 128/13 138/11 139/2 found [9] 6/7 6/13 6/17 10/23 65/5 75/21 85/14 93/19 159/15 four [9] 79/3 79/11	gap [2] 22/13 142/1 gaps [1] 30/15 gathering [1] 89/18	had [187] hadn't [6] 1/12 9/20 25/7 102/4 136/2 158/14 hand [2] 129/24 151/2 handed [2] 140/12 145/15 handle [1] 53/14 handled [1] 159/19 handling [1] 143/18 handwritten [17] 1/11 2/10 4/2 4/17 4/20 4/22 4/24 5/8 5/11 6/6 9/14 9/19 11/2 11/10 11/23 159/9 163/2 Hannon [4] 2/5 2/11 126/13 126/17		

H	71/10 71/16 71/17 71/19 71/20 72/9 100/15 100/18 107/7 108/19 114/25 115/5 136/16	100/10 101/25 102/5 102/17 103/8 121/6 121/20 129/1 144/9 161/12	48/17 62/11 94/15 95/19	5/23 6/24 9/15 26/24 37/16 57/6 90/3 113/5 121/14 136/18
happen [8] 42/19 43/19 43/22 54/7 59/17 133/23 141/7 161/22	he's [4] 19/13 74/20 100/16 100/18	here's [2] 22/11 22/12	hugely [1] 83/14 Hugh [6] 51/9 52/10 52/16 53/18 54/20 98/17	I couldn't [1] 59/19 I cover [2] 61/11 65/8 I did [6] 8/15 12/22 22/6 23/12 115/17 135/20
happened [25] 11/10 18/24 20/5 27/21 27/21 29/11 37/18 39/18 59/18 67/13 113/12 125/18 126/22 126/25 127/5 136/13 136/23 137/7 138/21 139/25 140/17 140/22 140/23 159/7 160/4	head [15] 24/16 27/16 71/2 106/6 107/4 107/7 107/9 107/12 108/4 109/7 109/18 110/13 111/15 118/3 162/2	hesitating [1] 76/16 high [4] 30/19 35/23 46/6 59/7	Hugh Widdis [1] 98/17	I didn't [3] 29/5 35/11 95/15
happening [9] 26/21 44/1 48/1 58/2 60/4 83/12 89/8 96/14 96/15	heading [2] 36/4 110/11	higher [2] 32/20 32/22	hypothetical [1] 17/9	I do [14] 8/24 13/20 40/9 65/25 77/19 78/4 81/6 87/7 92/11 100/21 105/20 107/13 125/3 158/5
happens [2] 119/22 161/2	headlines [1] 35/20	highest [1] 73/17	I	I accept [3] 17/13 19/6 22/10
happy [2] 7/23 40/10	heads [2] 72/21 107/15	highlight [3] 6/25 10/14 10/15	I actioned [1] 140/19	I acted [1] 67/16 85/19
Harbinson [1] 22/3	health [44] 26/8 32/3 36/15 43/12 43/14 43/15 43/24 44/4 44/25 45/5 45/16 45/18 45/19 45/20 50/5 50/19 50/23 51/2 51/21 51/24 52/21 52/25 53/5 53/14 56/7 59/22 61/3 62/4 62/24 69/3 69/14 70/20 73/6 73/9 74/2 74/21 76/25 79/18 81/18 82/5 82/7 92/4 103/9 103/11	highlighted [1] 2/2 him [2] 18/22 49/19 his [12] 18/25 19/23 22/3 22/3 51/13 71/19 74/19 100/18 108/18 109/1 115/1 115/9	I actually [2] 67/16 85/19	I don't [53] 20/1 22/4 30/21 31/3 32/3 37/16 38/7 38/8 40/1 40/2 41/19 42/2 43/5 45/20 47/10 49/7 52/9 52/10 52/15 58/25 59/10 60/1 60/1 60/1 62/7 62/9 64/12 69/9 71/3 72/8 72/22 73/13 74/6 76/20 76/23 77/4 78/1 81/3 89/11 91/17 94/7 97/5 97/5 97/13 101/19 120/17 134/24 149/15 151/7 152/17 161/12 163/13 164/6
hard [5] 82/21 89/22 90/8 117/7 162/16	heard [11] 18/11 24/3 75/25 83/7 83/7 92/14 97/7 97/14 158/9 159/21 159/24	hit [1] 102/16 HOCS [3] 116/18 130/17 130/17	I agree [5] 20/20 26/24 49/18 72/20 153/1	I also [3] 22/9 116/25 118/1
has [39] 1/6 5/17 15/12 23/1 24/14 41/5 41/22 42/3 54/21 72/23 79/16 79/21 83/7 83/7 83/20 84/11 87/24 89/21 89/22 90/23 114/24 118/11 126/22 132/11 134/2 134/8 142/16 144/9 146/16 146/23 151/8 154/8 154/17 156/15 156/23 157/16 158/1 160/4 163/14	hear [2] 24/6 25/4	hold [2] 21/4 143/5 holding [1] 63/21 Holiday [1] 99/10 holistic [1] 30/8 Holmes [1] 2/5 Home [2] 12/6 12/11 Home Office [1] 12/6 homes [3] 96/4 132/16 132/18	I am [13] 7/20 8/18 9/6 20/3 30/23 34/17 37/13 105/16 106/8 106/14 107/12 107/13 123/15	I am [13] 7/20 8/18 9/6 20/3 30/23 34/17 37/13 105/16 106/8 106/14 107/12 107/13 123/15
have [230]	hearing [4] 58/9 88/2 155/5 164/20	hope [6] 57/23 74/5 113/15 158/24 161/20 164/17	I apologise [2] 104/12 161/4	I ask [9] 8/4 13/24 30/11 32/15 94/4 98/13 104/19 160/17 161/11
haven't [11] 6/13 49/22 50/11 56/13 86/21 101/7 123/16 139/13 145/13 152/6 152/11	heat [2] 48/12 48/13 heavy [2] 90/2 90/19 height [1] 68/23 held [9] 4/10 4/13 5/4 5/6 6/19 54/2 54/8 142/4 150/9	hopefully [1] 33/8 hospitality [1] 89/12 hospitals [1] 73/24 house [2] 88/25 89/9 how [46] 5/14 13/18 17/14 21/3 21/12 21/12 23/22 26/14 27/4 33/7 33/7 38/23 38/24 39/8 43/23 47/13 51/4 52/6 66/25 68/20 69/4 81/19 95/6 95/11 95/20 99/7 100/16 101/11 101/21 102/8 102/8 102/9 108/23 110/24 111/3 111/19 112/5 126/1 126/24 140/23 141/6 142/19 152/19 159/4 160/8 162/20	I asked [1] 125/1 I became [1] 27/18 I being [1] 62/19 I believe [4] 38/18 90/1 134/12 162/22	I brought [1] 121/17 I came [1] 109/24 I can [23] 1/7 20/18 21/15 22/21 28/13 29/12 45/21 53/21 54/7 61/4 72/9 87/4 88/10 94/2 96/7 101/14 105/10 105/24 106/5 113/15 150/21 159/4 161/20
having [37] 6/17 6/18 15/1 16/24 19/5 22/15 22/20 22/24 23/23 24/4 25/1 33/5 50/18 59/4 60/13 61/18 63/2 64/25 71/4 72/12 72/17 72/18 93/20 99/4 100/10 104/12 105/25 110/6 110/8 110/10 111/22 113/15 152/16 156/3 157/20 161/13 161/14	help [20] 24/5 27/9 28/4 28/25 29/8 29/10 29/10 29/12 46/15 50/3 50/8 56/14 90/16 96/3 102/21 103/3 104/3 130/13 132/24 149/24	however [7] 110/2 121/25 128/1 143/6 157/5 157/15 163/25	I can't [5] 56/9 56/9 71/2 81/24 109/23 I cannot [1] 82/1 I check [1] 45/2 I come [2] 87/25 103/3 I commissioned [1] 116/7 I communicated [1] 116/18 I concur [1] 153/7 I considered [1] 123/18 I convened [2] 121/23 140/16 I could [12] 1/25 5/22	I guess [11] 112/19 131/3 134/24 141/11 142/20 143/10 144/8 153/20 154/2 159/12 163/22 I had [4] 111/12 122/5 134/25 164/6 I have [9] 50/12 63/3 76/9 106/20 124/14 124/16 145/1 148/3 160/3 I haven't [2] 145/13 152/11 I heard [2] 159/21 159/24 I hope [4] 74/5 113/15 161/20 164/17 I just [17] 11/13 11/15 29/25 44/25 49/5 50/2 50/13 51/5 55/20 62/14 73/21 87/11 93/16 95/3 117/3 117/5 145/9 I knew [1] 21/3 I know [13] 12/11 15/13 32/17 34/15 61/3 68/6 83/6 87/11 106/1 109/16 109/19
he [37] 15/24 15/25 18/22 19/4 19/17 20/22 26/1 29/16 29/19 29/20 50/15 50/15 51/9 51/12 51/13 52/4 52/5 52/11 52/11 52/18 52/22 53/21 54/5 64/24	helpful [1] 149/10 helpfully [1] 137/1 helps [1] 73/1 her [7] 85/20 93/20 109/11 114/18 137/24 138/1 138/1	HR [1] 22/8 hub [7] 21/24 25/3 25/10 27/25 28/9 28/10 28/11 huge [6] 41/23 47/4		

I	21/1 41/20 90/8 112/12	121/8 125/16 137/15 137/25 145/6	65/13	individual [6] 47/18 47/21 47/24 48/16 48/17 137/15
I know... [2] 114/10 121/7	I take [2] 30/24 45/16	I'm [89] 7/24 8/1 12/1 13/17 15/12 15/17 17/24 20/2 27/3 28/7 28/13 28/15 28/16 28/18 29/5 31/25 34/24 35/2 35/11 35/12 35/15 38/3 38/3 40/10 44/3 44/6 45/23 47/19 50/1 50/17 52/20 53/24 56/14 57/1 62/18 62/20 63/1 63/5 67/7 69/18 76/11 77/2 78/10 80/20 82/2 84/25 86/21 88/1 88/3 90/15 92/13 92/14 92/16 94/2 95/17 98/8 98/20 101/20 102/18 103/12 106/3 107/25 108/14 108/19 109/21 111/5 113/6 113/9 113/9 113/19 114/5 118/22 121/18 122/10 123/15 124/17 126/8 138/15 139/14 146/8 147/13 152/2 152/15 155/14 158/8 160/14 161/14 164/8 164/13	implements [1] 16/6 110/10	individuals [12] 76/8 77/14 116/19 116/21 118/18 123/24 131/14 132/12 135/7 151/16 152/16 154/1
I live [1] 162/13	I talked [2] 22/6 156/22	I think [351]	implications [3] 69/24 123/21 143/1	inducted [1] 23/1
I look [2] 23/15 111/23	I thought [4] 55/20 58/16 122/8 164/12	I took [5] 47/3 109/11 110/23 111/23 116/4	import [1] 152/24	inequalities [1] 93/21
I make [2] 7/6 7/8	I transferred [2] 12/25 13/7	I understood [7] 35/7 83/2 86/13 126/5 136/15 140/5 143/21	importance [5] 7/6 7/7 119/24 121/10 149/17	inevitably [1] 96/23
I may [21] 1/4 1/22 12/1 12/4 21/18 46/4 49/5 50/6 66/1 81/5 82/25 84/13 88/10 92/23 123/8 126/8 137/16 138/3 138/15 149/20 158/8	I understand [7] 35/7 83/2 86/13 126/5 136/15 140/5 143/21	I wanted [3] 9/12 134/5 146/4	imposed [2] 79/11 112/21	inexorable [1] 42/7
I mean [19] 17/6 17/25 20/16 21/5 28/25 49/22 51/22 57/20 63/6 68/24 70/23 94/12 94/15 97/7 110/21 133/17 146/8 152/19 152/20	I want [6] 12/3 20/7 23/22 86/20 92/8 98/16	I was [36] 1/4 11/12 11/14 11/16 12/23 13/6 13/13 20/2 21/1 21/2 23/5 25/22 25/22 29/6 31/10 34/7 36/23 37/16 38/18 58/18 86/12 91/21 97/5 97/5 106/23 110/23 110/25 117/22 118/5 119/1 122/1 122/7 126/6 130/18 138/10 159/22	impose [1] 71/20	inexperienced [1] 101/1
I meant [2] 26/25 56/22	I wasn't [3] 34/7 110/21 136/15	I welcome [1] 155/5	impossible [1] 61/12	inexplicable [2] 159/12 159/21
I mentioned [1] 133/25	I will [6] 7/21 23/3 30/18 87/7 93/10 113/19	I wish [1] 7/22	impressed [2] 79/11 112/21	infected [1] 58/20
I might [3] 88/13 98/22 107/21	I won't [3] 38/11 66/1 99/15	I wonder [6] 1/6 1/22 9/15 15/10 15/15 26/8	improvement [1] 57/14	infection [3] 59/7 67/14 67/15
I move [1] 13/20	I wondered [1] 69/16	I would [33] 13/13 16/22 18/8 18/12 28/9 35/17 40/13 48/8 59/1 69/7 71/3 71/5 77/7 77/24 89/19 93/16 93/24 95/10 98/4 101/16 110/10 112/8 116/8 123/18 128/1 131/15 133/12 133/21 133/25 134/12 135/3 144/10 148/2	improved [1] 79/16	influenza [1] 32/5
I need [4] 73/13 76/11 160/22 160/23	I would [33] 13/13 16/22 18/8 18/12 28/9 35/17 40/13 48/8 59/1 69/7 71/3 71/5 77/7 77/24 89/19 93/16 93/24 95/10 98/4 101/16 110/10 112/8 116/8 123/18 128/1 131/15 133/12 133/21 133/25 134/12 135/3 144/10 148/2	I won't [3] 38/11 66/1 99/15	improvements [2] 95/9 96/18	inform [4] 48/4 129/17 133/9 141/22
I note [1] 131/25	I wouldn't [12] 21/14 35/16 39/12 42/13 42/15 42/15 63/18 63/18 77/9 94/22 97/17 148/2	I wish [1] 7/22	improving [1] 67/7	informal [18] 106/2 117/12 121/20 122/22 123/6 124/11 136/7 138/19 143/25 144/3 144/20 146/6 147/16 147/19 148/16 149/17 151/1 155/21
I noted [1] 1/14	I wrote [1] 101/17	I won't [3] 38/11 66/1 99/15	impression [2] 158/19 158/25	informally [1] 150/9
I now [1] 58/25	I'd [4] 6/8 69/25 97/18 116/12	I'd [4] 6/8 69/25 97/18 116/12	imprisoned [1] 96/4	information [70] 25/2 44/12 45/20 50/22 103/9 118/2 118/11 119/7 122/20 122/21 122/24 123/18 123/25 124/4 124/6 124/7 124/8 124/14 124/24 125/14 126/24 129/19 133/5 133/6 133/8 135/19 136/4 137/4 140/18 141/21 142/1 142/2 142/7 142/7 142/8 142/12 142/16 142/18 143/8 143/19 143/22 143/23 144/4 144/9 144/11 144/13 144/14 145/2 145/11 145/16 145/20 146/24 146/25 147/20 148/15 149/3 150/6 152/11 154/11 154/13 154/14 154/24 157/6 157/8 157/10 157/11 159/25 160/7 162/3 162/25
I observed [1] 111/1	I'll [10] 15/20 51/5 53/24 56/4 80/20	I'll [10] 15/20 51/5 53/24 56/4 80/20	improve [3] 19/24 56/21 56/21	informed [5] 62/2 62/4 134/2 135/16 161/2
I opened [2] 1/8 1/8			improved [1] 79/16	informing [2] 118/6 135/6
I ordered [1] 121/5			improvement [1] 57/14	infrastructure [1] 124/1
I please [1] 93/13			improvements [2] 95/9 96/18	inherent [2] 162/6 163/9
I presume [1] 51/14			improving [1] 67/7	
I probably [1] 161/21			inability [2] 156/6 156/18	
I provided [2] 117/2 117/18			inaudible [2] 153/23 156/16	
I put [2] 2/13 141/5			include [2] 99/14 118/17	
I raised [1] 134/24			included [7] 3/6 4/23 45/5 100/5 114/7 143/17 157/3	
I read [1] 124/10			including [5] 2/5 36/8 93/12 100/1 118/18	
I really [2] 76/19 93/20			inconsistent [1] 156/17	
I recall [1] 74/16			incorrect [1] 66/19	
I refer [1] 20/22			increased [1] 69/6	
I referenced [1] 136/15			incredibly [4] 17/25 52/4 81/2 92/17	
I referred [1] 1/9			incrementally [1] 66/7	
I responded [1] 27/19			indeed [16] 71/7 103/17 104/2 107/12 108/15 108/22 110/4 113/13 119/6 134/13 134/16 143/11 144/14 151/5 157/12 161/15	
I said [5] 47/7 62/20 62/22 123/17 160/19			independent [1] 162/17	
I saw [1] 65/22			INDEX [1] 164/22	
I say [2] 59/6 69/2			indicate [1] 116/6	
I see [2] 13/9 99/20			indicated [1] 133/3	
I shall [1] 48/24			indicates [2] 134/15 146/16	
I should [1] 115/23			indication [3] 4/12 116/13 117/21	
I simply [1] 78/9				
I started [1] 12/22				
I suppose [5] 18/7				

I	144/2 151/8 153/8 153/12 156/4 158/9 158/15 161/6 165/3 165/8 165/15 Inquiry's [7] 24/20 105/25 111/4 117/24 118/21 135/23 148/7 insight [2] 46/22 124/2 insights [1] 157/14 Insofar [1] 132/2 instance [1] 135/5 instructing [1] 118/19 instructions [1] 140/25 insurance [1] 130/25 intended [11] 7/1 32/20 40/5 46/5 46/9 47/1 47/8 81/14 81/17 130/13 149/24 intensive [1] 75/3 intent [1] 116/6 interactions [1] 67/1 interchangeably [1] 34/16 interest [1] 5/9 interested [4] 21/10 21/14 60/24 90/5 interests [1] 82/22 interim [3] 79/13 109/7 109/11 internal [5] 125/20 131/19 140/20 141/1 141/10 internally [1] 114/12 interpretation [1] 116/14 interrogated [1] 139/8 intersect [1] 26/15 intervening [1] 136/10 into [43] 5/18 29/6 31/11 36/1 41/16 44/2 46/16 47/21 49/20 53/2 61/14 61/19 61/20 77/16 80/17 81/24 82/22 90/25 97/7 97/10 101/7 103/10 109/24 109/25 110/12 111/1 112/5 112/14 115/12 124/23 134/11 135/17 137/14 139/14 140/22 142/17 144/18 150/10 151/3 154/20 157/14 160/8 162/24 intranet [1] 152/13 intrinsic [1] 31/19 investigate [2] 11/10 136/12 investigation [8] 5/17 135/17 136/18	136/19 137/3 160/3 160/18 161/3 investigations [1] 5/20 investment [1] 109/10 invitation [1] 72/11 invoke [1] 33/23 invoked [1] 82/15 involved [10] 23/23 24/3 26/11 27/23 60/19 85/12 87/20 130/10 132/12 134/19 involvement [1] 86/24 iPads [1] 146/3 Ireland [58] 12/18 12/21 12/22 12/25 15/8 16/8 16/16 17/12 18/19 19/14 31/6 34/2 36/9 39/4 42/7 49/23 58/2 63/9 63/14 64/3 64/6 64/8 69/23 70/2 70/20 73/9 73/14 73/22 74/2 81/15 82/9 90/7 90/12 93/13 94/1 94/21 106/7 107/10 107/18 108/24 110/4 114/16 114/20 115/14 120/5 120/13 120/24 121/4 122/2 123/10 141/8 147/18 151/9 154/13 156/5 161/18 161/22 162/21 Ireland's [1] 149/16 Irish [5] 64/25 95/22 98/14 113/8 113/9 irrelevant [1] 153/5 is [334] isn't [15] 15/24 19/4 35/3 35/24 40/8 44/12 49/24 54/5 91/9 96/20 137/18 148/21 150/15 151/24 152/20 isolating [1] 46/1 issue [34] 1/6 7/18 7/19 9/19 37/21 50/1 63/8 63/11 99/4 99/7 99/16 99/21 101/15 101/23 102/23 104/13 104/14 106/2 111/12 119/19 125/17 125/17 129/17 130/19 135/3 144/19 153/7 153/12 153/13 154/7 158/20 158/24 159/2 159/5 issued [1] 155/2 issues [26] 22/8 24/17 34/1 46/21 50/4 60/8 60/14 70/15 72/4 75/12 103/6 103/7 112/17 117/24 122/8 133/16 135/1 140/15 141/12 143/21 153/15	155/1 155/3 159/3 159/20 160/1 issuing [2] 86/17 88/19 it [425] IT Assist [5] 125/21 138/7 138/23 139/13 142/23 IT teams [1] 119/8 it's [172] item [2] 3/9 159/23 items [4] 4/6 4/7 35/16 159/7 its [9] 5/5 14/4 14/22 16/17 39/11 42/6 43/15 84/14 156/15 itself [1] 14/10	132/13 139/23 just [166] justice [4] 12/24 13/6 16/25 87/25 Justice was [1] 12/24
			K	
			KAREN [3] 8/2 8/6 165/6 KC [2] 98/11 165/11 keen [1] 26/14 keep [7] 20/7 48/5 67/10 112/12 112/13 161/2 161/6 keeping [3] 112/13 134/15 155/8 keeps [1] 147/2 kept [4] 104/12 119/24 143/13 158/4 key [8] 57/17 65/4 97/13 111/2 111/10 118/17 121/6 122/8 key workers [2] 65/4 97/13 kind [13] 22/14 30/15 42/24 58/15 64/11 141/18 141/21 142/21 143/2 151/20 152/7 152/21 162/5 Kingdom [2] 73/18 97/8 knew [1] 21/3 know [53] 12/11 15/13 15/20 21/20 21/21 27/16 28/2 30/1 30/22 31/19 31/20 32/17 34/15 35/16 39/25 41/12 42/15 43/25 56/17 56/18 56/19 56/23 61/3 68/6 73/25 80/8 80/12 83/6 87/11 89/24 94/7 97/6 97/15 97/17 99/10 101/4 106/1 109/1 109/16 109/19 114/10 114/23 119/11 121/7 128/18 129/22 136/20 140/7 148/11 151/7 152/17 163/13 164/1 knowing [2] 103/17 103/18 knowledge [6] 8/17 9/4 33/3 105/8 105/15 105/22 KnowledgeNetwork [1] 147/4 known [9] 5/16 35/17 52/10 96/21 133/13 133/15 133/19 133/23 134/10	
			L	
			lack [9] 17/10 24/18	

L	156/15 157/16	lockdown [9] 47/16 67/11 72/17 75/17 102/2 102/4 102/6 103/18 103/21	110/12 113/3	49/12 51/22 55/7 55/13 55/16 56/23 57/9 57/15 63/10 96/21 99/2 99/9 100/12 100/24 101/25 105/12 105/17 145/21
lack... [7] 39/8 50/22 97/15 159/23 160/1 160/1 162/7	legislation [1] 47/5	lockdowns [1] 95/23	major [4] 16/12 17/11 18/5 18/20	March 2020 [2] 28/6 145/21
Lady [23] 1/4 1/6 2/2 5/25 6/24 7/13 7/24 7/25 17/5 23/21 49/4 62/18 82/25 86/11 97/5 98/12 104/12 107/17 113/8 155/14 160/15 161/4 164/16	legitimate [2] 38/20 63/21	London [1] 161/14	make [30] 6/14 7/6 7/8 18/10 33/13 42/15 51/17 53/24 65/1 65/3 74/6 76/11 84/22 85/4 89/13 90/7 93/19 95/9 95/12 96/8 96/17 115/19 119/6 122/7 124/20 145/7 146/25 147/13 154/1 157/9	Maria [2] 2/5 129/17
laid [1] 60/14	lengths [1] 89/13	long [12] 36/18 52/10 52/10 80/21 85/7 85/15 85/23 86/3 86/15 122/18 159/16 164/12	makes [5] 19/21 19/22 74/5 143/14 149/2	marked [1] 110/25
language [3] 10/4 75/16 116/11	less [5] 22/23 74/4 85/11 92/16 102/8	long-term [1] 36/18	making [43] 31/18 34/7 35/22 36/12 37/3 37/14 37/23 38/15 38/20 39/3 39/17 39/23 40/6 40/16 40/20 40/21 41/1 46/2 52/11 52/16 53/4 57/7 63/3 66/16 69/5 70/11 84/6 84/14 84/18 85/12 90/25 99/8 99/17 99/23 99/25 101/12 101/18 103/13 112/13 113/4 144/6 147/7 150/15	marker [2] 35/2 35/15
large [7] 33/3 62/2 73/24 76/8 151/9 151/13 157/25	lessons [1] 16/5	longer [1] 121/24	Mallon [3] 85/7 86/4 86/16	massive [2] 87/24 96/18
last [4] 36/5 51/13 92/17 156/21	let [5] 15/20 47/12 82/4 105/3 124/20	look [40] 6/8 9/24 10/13 10/25 23/15 24/13 30/6 33/9 33/20 36/5 36/5 36/24 38/23 41/20 44/23 45/15 45/22 45/23 48/11 49/11 52/18 72/6 73/1 92/6 92/7 100/15 111/23 126/9 126/11 128/4 129/11 134/11 137/2 142/20 144/15 146/12 149/5 149/8 149/22 153/25	manage [1] 68/20	material [13] 3/6 30/15 36/22 119/24 120/7 120/8 120/10 123/14 123/14 124/23 144/25 145/24 160/23
late [10] 85/11 85/15 85/23 86/2 86/6 86/8 86/10 86/12 160/6 160/8	let's [3] 29/9 43/6 77/17	looks [4] 51/4 143/23 151/18 153/2	managed [1] 157/2	materially [1] 133/6
lateness [1] 159/25	letter [14] 1/23 1/25 2/1 2/3 4/25 6/24 114/15 116/9 117/19 120/12 120/24 121/1 122/19 123/17	losing [1] 59/8	management [4] 119/7 149/7 149/11 154/19	materials [4] 2/19 2/20 2/25 114/8
later [4] 28/1 100/8 116/17 149/21	level [16] 30/19 32/20 32/22 34/19 35/24 46/6 56/19 99/7 100/1 100/17 101/1 113/2 115/2 130/20 131/2 156/17	loss [3] 126/2 135/18 136/13	manager [8] 2/11 29/19 142/5 143/6 145/4 147/2 152/15 154/18	matter [8] 7/22 25/10 138/20 149/1 150/16 154/15 155/4 156/5
latter [1] 34/23	levels [2] 67/20 124/2	lost [1] 159/14	managing [1] 41/4	matters [6] 14/2 14/6 15/5 150/10 151/17 152/24
launch [2] 16/20 23/10	liable [2] 54/3 54/18	lot [5] 21/8 49/16 57/19 88/23 97/14	mandate [2] 127/22 163/25	may [78] 1/1 1/4 1/7 1/22 6/13 12/1 12/4 13/3 13/7 16/10 18/3 21/18 29/11 35/12 36/16 36/19 38/16 40/4 43/5 44/18 46/4 49/5 50/2 50/6 51/6 51/8 61/9 65/12 65/19 66/1 68/22 73/12 73/21 81/5 82/25 84/13 88/10 90/5 92/23 95/25 98/7 98/16 102/17 111/20 113/11 118/20 121/16 123/8 126/4 126/6 126/8 126/12 126/17 127/18 128/10 128/13 128/18 129/1 129/6 129/9 130/19 130/20 136/10 137/16 137/22 138/3 138/15 138/19 140/23 145/21 148/11 148/13 148/15 149/20 152/24 158/8 158/19 164/21
law [1] 89/19	lift [4] 18/10 65/16 67/6 79/20	lots [2] 88/24 88/24	mandatory [1] 107/20	May 2019 [2] 13/3 13/7
lead [13] 1/3 8/3 23/16 24/4 24/10 24/14 52/24 60/18 96/20 104/18 165/3 165/8 165/15	lifted [3] 66/7 66/20 79/12	love [1] 93/24	manual [1] 158/2	May 2023 [1] 126/6
lead-up [1] 96/20	lifting [6] 66/2 66/4 66/10 66/24 67/5 67/15	loved [1] 62/25	manually [1] 153/24	maybe [13] 21/1 29/9 29/24 38/12 44/4 44/7 50/3 88/1 90/5 90/6 119/15 121/6 158/24
leader [1] 112/3	light [3] 126/1 136/4 154/8	low [2] 67/17 67/20	manuscript [2] 10/1 10/14	McCormick [1] 29/16
leaders [2] 100/3 102/9	like [11] 6/22 38/23 61/1 65/9 73/22 73/23 85/23 95/10 99/11 117/10 148/2	lunch [1] 104/13	many [6] 48/8 48/10 73/24 154/9 160/5 160/12	McMahon [1] 108/16
leading [1] 96/21	liked [1] 93/20	M		
leads [6] 24/9 25/6 25/13 26/22 27/14 130/23	likely [4] 34/1 40/19 59/12 59/17	made [43] 2/15 3/13 6/2 6/10 6/18 7/3 7/9 7/15 8/7 8/10 17/17 24/21 26/21 39/9 40/24 46/2 65/2 70/12 75/1 79/9 85/5 104/22 104/25 105/11 105/17 105/25 109/22 112/16 112/25 117/21 123/13 124/9 128/6 130/14 135/6 135/24 136/16 141/16 141/23 142/24 147/6 158/12 162/11		
leaking [6] 83/10 83/22 83/25 84/1 84/16 86/7	line [5] 9/25 29/19 34/11 35/16 90/23	magnitude [3] 38/21		
learnings [1] 154/15	line manager [1] 29/19			
learnt [1] 16/6	lines [1] 76/6			
least [3] 56/20 98/6 140/18	list [5] 2/19 3/3 33/5 58/15 70/15			
leave [5] 62/8 62/10 62/16 83/1 125/23	listed [1] 57/19			
leaving [1] 46/14	listen [1] 92/11			
led [4] 80/8 103/6 103/6 131/8	listening [1] 62/7			
left [10] 46/18 90/21 109/1 121/4 121/4 124/13 125/18 127/22 127/23 128/3	little [7] 41/20 50/20 67/4 103/20 106/5 128/9 151/12			
legal [13] 2/18 2/23 3/2 107/17 116/1 117/7 119/2 123/23 130/11 141/1 144/17	live [1] 162/13			
	lived [1] 75/22			
	livelihoods [1] 65/14			
	lives [1] 59/9			
	living [1] 89/13			
	local [3] 68/8 68/12 92/4			
	located [1] 2/10			

M	128/22 129/6 129/8 129/11 129/25 130/3 130/3 130/9 130/18 130/22 131/10 131/12 131/18 131/22 131/25 132/1 133/7 133/12 133/14 134/13 134/17 134/23 134/25 135/1 158/18	50/19 50/20 51/18 51/24 52/17 52/23 52/24 53/6 53/6 53/12 53/13 54/2 54/15 57/15 57/17 58/4 58/4 75/24 76/12 78/4 80/1 80/21 82/13 85/9 85/15 85/23 86/3 86/4 86/15 86/16 99/5 99/6 100/2 100/2 100/13 100/14 103/11 107/19 110/14 110/15 110/20 110/20 111/19 111/19 112/1 112/2 116/5 116/6 117/1 117/1 117/16 117/16 119/12 119/12 121/23 121/24 126/16 126/16 127/12 128/2 128/7 128/15 137/18 139/21 139/21 139/22 147/5 156/11 163/15 163/15	10/2 11/3 20/11 99/2 115/2 129/12 132/9 132/19 133/24 134/7 158/13 158/15 minute-taker [2] 6/11 6/13 minuted [1] 134/2 minutes [15] 1/21 4/17 4/22 10/23 76/18 85/16 129/8 130/13 130/15 134/20 158/10 158/18 159/8 159/9 163/2 missed [1] 69/25 missing [16] 1/12 2/19 2/20 3/7 3/13 3/16 4/1 4/22 5/10 5/11 5/17 5/21 6/22 11/10 11/18 57/25 mission [1] 111/3 mistake [2] 134/12 139/14 misunderstanding [1] 143/25 mix [3] 58/10 64/14 77/3 mixed [1] 29/25 mode [7] 41/25 42/10 56/13 56/15 57/1 59/13 101/7 model [2] 93/22 107/24 modelling [2] 77/23 78/19 module [12] 1/3 1/8 3/5 3/9 5/1 8/3 104/18 122/19 160/21 165/4 165/9 165/16 Module 2C [5] 1/8 3/5 3/9 5/1 122/19 modules [2] 92/14 160/22 moment [9] 21/19 48/12 48/20 71/2 93/10 95/6 102/14 155/12 157/6 Monday [1] 29/23 monitor [1] 31/12 month [1] 75/2 months [3] 11/16 75/3 96/21 more [47] 13/14 13/17 13/18 26/24 31/1 35/18 36/2 38/22 43/8 44/3 46/16 47/14 49/21 50/21 51/14 53/2 61/10 61/16 63/5 67/4 74/3 75/3 75/11 78/5 78/5 78/14 78/14 91/13 93/8 93/18 93/19 93/23 94/6 96/8 96/9 99/6 102/15 110/5 111/2 111/12 112/20 113/6 131/2	132/17 153/9 157/9 158/2 morning [8] 48/21 69/21 99/15 99/19 158/9 159/17 160/20 164/15 Morrow [1] 126/14 most [8] 40/6 46/20 47/11 52/2 58/23 61/9 70/13 70/16 move [11] 12/1 13/13 13/20 29/9 29/20 50/1 65/20 86/20 92/9 113/11 151/3 moved [7] 29/23 46/16 56/13 65/15 101/7 117/4 154/22 moving [4] 23/4 111/24 153/11 158/8 Mr [19] 1/17 15/6 15/23 21/22 22/3 23/6 23/13 25/25 27/9 30/20 51/9 53/25 54/4 71/15 92/10 102/7 113/25 114/24 116/11 Mr Brennan [1] 71/15 Mr Harbinson [1] 22/3 Mr Hugh Widdis [1] 51/9 Mr Phillips [1] 92/10 Mr Stewart [7] 15/6 15/23 21/22 25/25 27/9 30/20 114/24 Mr Stewart's [2] 23/6 23/13 Mr Storey [1] 1/17 Mr Tierney [1] 116/11 Mr Widdis [2] 53/25 54/4 Mr Widdis' [1] 102/7 Ms [54] 2/5 2/5 2/11 7/14 8/2 8/7 9/7 9/18 15/17 16/14 17/20 23/7 23/22 24/2 33/19 35/3 44/6 48/23 49/3 49/5 50/11 70/17 83/2 83/2 83/5 97/2 98/10 98/11 98/13 98/20 99/15 103/25 104/2 104/17 104/22 114/12 126/13 126/14 126/14 126/17 127/8 127/14 128/10 132/16 132/18 133/25 145/10 155/18 160/17 162/11 164/8 165/6 165/11 165/13 Ms Brady [4] 104/22 145/10 160/17 164/8 Ms Campbell [3] 97/2 98/10 103/25 Ms Dobbin [9] 7/14
----------	--	---	--	--

M	153/19 155/14 156/6 156/16 160/15 160/15 161/4 162/13 162/23 164/16	NHS [1] 71/22 NI [8] 25/10 37/15 38/6 39/10 39/14 39/19 40/11 41/22	42/7 49/23 58/2 63/9 69/23 70/2 70/20 73/9 73/14 73/22 74/2 81/15 82/9 90/7 90/12 93/13 94/1 94/21 106/7 107/10 107/18 108/24 110/4 114/16 114/20 115/14 120/5 120/13 120/24 121/4 122/2 123/10 141/8 147/18 151/9 154/13 156/5 161/18 161/22 162/21	24/17 46/13 47/5 51/20 60/13 67/19 68/13 75/18 88/16 96/24 97/7 97/8 106/15 107/8 137/11 140/10 141/9 143/20 148/8 156/21		
Ms Dobbin... [8] 23/7 49/3 83/2 98/20 99/15 133/25 155/18 162/11	my Lady [22] 1/4 1/6 2/2 5/25 6/24 7/13 7/24 7/25 17/5 23/21 49/4 62/18 82/25 86/11 97/5 98/12 104/12 107/17 113/8 155/14 161/4 164/16	NICS [5] 14/13 125/20 149/7 149/12 156/13 night [1] 99/2 nine [1] 107/17 no [52] 4/20 5/12 10/24 11/15 11/15 16/5 17/4 17/17 22/2 25/19 25/19 29/5 30/16 31/3 31/3 31/25 36/23 45/5 52/9 54/10 59/10 59/13 59/23 60/1 62/20 63/4 85/2 94/23 95/16 95/16 108/15 109/3 109/18 114/7 121/24 124/14 132/4 133/25 136/2 136/19 145/1 145/10 145/18 148/23 148/23 150/24 154/19 154/21 162/10 162/12 162/20 163/20	81/15 82/9 90/7 90/12 93/13 94/1 94/21 106/7 107/10 107/18 108/24 110/4 114/16 114/20 115/14 120/5 120/13 120/24 121/4 122/2 123/10 141/8 147/18 151/9 154/13 156/5 161/18 161/22 162/21	numbers [5] 58/6 58/19 67/17 74/13 74/22		
Ms Griffith [4] 126/14 127/8 127/14 128/10	myself [4] 28/16 63/18 93/17 116/10	no one [3] 22/2 54/10 109/18 no-deal [1] 17/17 nodding [1] 99/20 non [4] 14/20 71/25 154/6 162/18 non-Covid [1] 71/25 non-Executive [2] 14/20 162/18 non-official [1] 154/6 nonetheless [4] 19/13 19/14 37/20 148/15 nor [2] 52/15 95/24 normal [1] 109/8 Northern [59] 12/18 12/21 12/22 12/25 15/8 16/8 16/16 17/12 18/19 19/14 31/6 34/2 36/9 39/4 42/7 49/23 58/2 63/9 64/25 69/23 70/2 70/20 73/9 73/14 73/22 74/2 81/15 82/9 90/7 90/12 93/13 94/1 94/21 95/22 98/14 106/7 107/10 107/18 108/24 110/4 113/8 114/16 114/20 115/14 120/5 120/13 120/24 121/4 122/2 123/10 141/8 147/18 149/16 151/9 154/13 156/5 161/18 161/22 162/21	126/13 126/17 Ms Hannon [3] 2/11 Ms Homes [2] 132/16 132/18 Ms Jane Holmes [1] 2/5 MS JAYNE BRADY [1] 104/17 Ms Maria Hannon [1] 2/5 Ms Morrow [1] 126/14 Ms Pearson [16] 8/7 9/7 9/18 16/14 17/20 23/22 33/19 35/3 44/6 48/23 49/5 50/11 70/17 83/5 98/13 104/2 Ms Pearson's [1] 83/2 Ms Pyper [1] 114/12 much [23] 7/14 17/14 32/9 32/20 33/2 35/23 43/23 47/14 52/6 84/9 87/17 94/6 95/24 96/2 103/25 104/2 133/13 133/15 135/9 153/20 161/10 164/5 164/8 Munich [1] 54/11 must [9] 31/19 76/20 81/5 84/6 110/7 146/5 147/6 148/24 153/15 my [89] 1/4 1/6 2/2 5/25 6/24 7/13 7/24 7/25 10/8 11/16 14/17 16/23 17/5 18/7 19/20 21/9 22/10 23/21 29/6 29/7 29/15 29/19 29/25 34/24 39/17 40/10 41/11 47/7 49/4 49/14 58/15 59/14 61/2 61/11 62/18 63/4 65/9 69/2 71/2 71/5 82/25 86/11 86/12 97/5 98/12 98/13 102/17 104/12 107/9 107/17 108/13 108/16 108/17 109/23 110/7 110/21 110/23 110/24 111/3 111/6 112/16 113/8 116/6 116/6 123/17 123/19 123/24 125/3 131/11 133/6 133/10 133/14 134/1 142/1 142/5 143/7 144/12 145/4 145/25	N name [5] 7/15 8/4 33/19 98/13 104/19 narrow [1] 139/17 national [5] 62/15 92/10 161/23 161/25 163/17 Nationalist [3] 77/1 77/9 77/10 natural [1] 38/25 nature [5] 20/23 22/25 41/8 144/4 157/16 navigate [1] 112/21 navigating [2] 111/10 112/6 necessarily [7] 14/3 31/15 38/16 92/24 95/25 101/5 129/4 necessary [1] 79/19 need [46] 9/7 11/13 20/5 27/9 28/14 32/23 32/25 33/13 34/21 34/25 36/14 42/24 43/5 49/7 56/17 56/18 56/19 57/21 64/1 65/12 67/23 70/12 72/8 73/13 76/11 79/14 80/6 93/5 99/16 99/23 99/25 103/2 120/18 124/22 127/2 135/9 145/7 155/1 155/6 155/20 160/22 160/23 160/23 160/24 163/10 163/13 needed [13] 26/20 27/7 46/21 49/16 72/16 80/1 90/21 91/13 94/20 117/23 120/8 120/8 120/9 needs [8] 7/16 11/21 23/17 35/15 40/11 134/10 160/24 163/8 network [1] 157/1 never [4] 60/14 69/1 69/2 135/25 new [5] 39/12 50/25 55/24 58/12 147/25 next [5] 71/7 73/4 74/17 130/20 137/6	Northern Ireland's [1] 149/16 Northern Irish [4] 64/25 95/22 98/14 113/8 not [180] note [16] 6/5 6/9 43/23 85/20 103/5 116/25 121/3 121/19 128/1 129/6 129/22 129/25 131/16 131/25 132/4 133/18 noted [1] 1/14 notes [44] 1/11 2/6 2/8 2/10 2/16 2/21 3/5 4/2 4/9 4/10 4/13 4/17 4/20 4/24 5/4 5/6 5/8 5/11 5/21 6/3 6/7 6/10 6/14 6/16 6/19 6/21 7/4 7/7 7/9 9/14 9/20 9/21 10/1 10/6 10/14 11/2 11/11 11/18 11/23 56/23 127/2 131/9 159/13 163/3 nothing [5] 72/23 77/18 94/23 134/7 136/11 notice [1] 44/25 noticed [1] 85/19 notwithstanding [9] 4/12 19/12 44/19 75/12 83/14 141/15 143/12 160/1 163/1 November [2] 116/23 117/2 now [34] 5/19 6/9 8/7 9/7 9/12 12/1 17/13 23/15 37/13 41/20 58/25 64/13 70/9 73/6 75/22 80/5 88/10 94/4 98/19 99/4 100/10 100/22 101/5 104/3 111/6 115/22 130/3 137/14 149/21 154/23 155/4 155/5 156/23 158/8 nuance [1] 158/4 nuanced [1] 99/6 number [29] 3/11 3/14 4/2 4/5 5/4 6/17 13/2 14/19 18/21	O o'clock [1] 164/15 O'Neill [2] 57/15 139/10 objective [3] 57/18 63/3 69/1 objectives [4] 14/8 36/15 37/6 160/10 obligation [6] 120/25 123/13 124/9 125/8 141/22 143/15 obligations [5] 118/6 141/4 143/10 151/5 153/10 observation [4] 84/6 93/14 103/19 110/8 observed [2] 111/1 152/5 obstruction [1] 157/20 obtain [2] 7/3 7/9 obtained [1] 148/15 obvious [9] 37/13 37/20 78/14 95/17 95/20 99/18 99/21 101/13 110/2 obviously [47] 7/4 7/6 7/11 10/22 11/21 16/14 18/18 21/5 21/20 28/2 31/19 32/1 40/16 40/17 44/19 46/5 47/4 47/16 50/25 70/2 70/13 70/23 73/22 74/11 76/12 92/17 94/13 97/10 101/24 107/19 109/13 109/16 109/23 110/13 111/13 111/22 117/20 118/3 121/9 124/4 125/6 132/3 134/7 135/21 135/22 140/17 152/20 occasion [2] 83/17 98/6 occasionally [1] 61/20 occasions [2] 65/3 120/19 October [2] 73/4 120/22 October 2022 [1] 120/22 odd [1] 17/6

O	once [3] 2/22 66/20 70/17	17/23	10/18 18/14 21/11 25/17 28/8 28/12 32/17 33/8 36/10 42/11 46/16 52/19 54/10 63/14 64/9 69/13 69/14 77/1 82/15 84/13 85/4 85/5 86/22 88/8 88/11 90/20 92/5 92/14 97/21 107/21 107/23 109/14 110/5 121/9 122/6 122/24 123/2 123/12 124/15 138/12 138/19 139/25 140/5 158/2 160/21	90/25 99/11 109/11 127/7 137/17 137/23
off [5] 11/14 49/5 74/12 92/15 100/16	oncoming [1] 18/1	opposite [1] 145/12	109/14 110/5 121/9 122/6 122/24 123/2 123/12 124/15 138/12 138/19 139/25 140/5 158/2 160/21	overall [14] 28/10 37/15 56/19 60/9 61/3 66/6 81/8 108/22 141/17 141/19 141/24 158/5 160/8 161/15
offer [4] 26/15 28/14 51/17 103/1	one [55] 8/10 13/3 15/4 16/1 22/1 22/2 35/13 35/16 38/22 41/13 41/14 41/17 42/1 42/2 42/3 42/8 42/8 42/10 50/15 54/10 62/2 63/12 68/19 70/13 73/25 75/7 76/22 80/8 85/1 85/3 86/25 88/10 88/14 92/18 98/6 98/8 99/2 99/13 104/25 105/12 109/18 110/13 116/24 118/4 125/16 131/7 132/4 132/13 142/21 151/2 151/17 152/22 153/2 155/22 156/20	opted [1] 99/11	111/2 134/13 145/7 147/13 152/13 153/22 157/2 157/3 157/13 160/10 160/10 162/6 163/12	overarching [8] 14/16 19/13 30/7 30/14 43/11 52/22 93/14 141/6
office [60] 1/21 1/24 1/24 2/4 2/16 3/9 5/1 8/21 10/5 10/6 11/22 12/5 12/6 12/18 12/22 13/8 13/12 14/10 14/12 14/23 15/2 24/19 24/21 30/1 46/10 105/1 108/10 109/24 113/24 115/12 115/24 116/7 118/9 118/19 120/4 120/22 123/4 123/10 124/13 124/24 125/19 127/10 127/15 137/5 138/11 138/17 139/1 139/9 139/19 141/1 141/22 143/18 144/12 145/22 146/24 147/4 147/9 156/23 158/3 158/11	ones [6] 48/13 62/25 70/14 70/18 152/2 152/5	optimum [1] 113/2	163/12	overlay [1] 157/14
officer [6] 74/19 98/5 107/13 107/16 108/19 118/11	one minute [1] 99/2	options [5] 51/14 52/13 52/19 53/20 113/2	ought [4] 5/13 29/2 94/6 105/3	overlying [1] 160/5
officers [3] 92/4 119/8 157/11	ongoing [6] 4/15 5/3 20/23 62/12 77/24 96/13	or [120] 4/19 6/12 7/6 10/5 11/8 16/10 16/17 17/7 18/3 18/5 20/17 21/10 21/21 22/1 25/14 25/20 28/4 30/15 32/6 32/18 32/19 34/21 35/4 35/5 35/17 36/21 36/21 37/4 37/21 37/24 43/1 45/2 46/10 47/3 47/3 47/13 47/14 48/4 48/7 49/12 50/19 51/17 51/19 53/3 54/3 55/13 56/21 59/16 60/4 60/23 62/19 63/10 64/7 66/19 69/3 72/15 72/17 73/7 78/17 78/19 79/9 80/13 85/3 85/11 85/23 86/6 87/9 87/20 88/19 89/6 89/7 90/9 90/11 90/11 93/2 95/24 96/5 99/6 109/2 110/16 111/18 112/15 116/2 118/7 118/8 124/6 126/3 127/22 128/11 132/25 133/3 136/12 137/10 138/18 138/18 138/22 140/11 140/12 141/7 143/25 144/19 144/22 144/22 144/24 145/12 146/6 149/12 151/19 153/5 153/15 154/16 154/21 158/1 158/17 158/20 158/22 162/9	our [21] 7/2 24/9 26/14 26/16 38/5 39/12 95/7 102/9 111/2 134/13 145/7 147/13 152/13 153/22 157/2 157/3 157/13 160/10 160/10 162/6 163/12	overlays [1] 33/7
offices [7] 119/5 138/6 138/6 138/12 138/17 140/4 143/1	opened [3] 1/8 1/8 158/14	order [15] 7/3 7/9 7/10 11/9 17/10 19/9 29/2 42/18 48/15 80/13 82/18 87/3 115/2 119/4 135/18	out [78] 2/7 2/11 2/14 2/18 2/20 3/3 3/19 3/24 4/3 4/5 4/14 4/21 5/2 5/5 5/6 5/25 16/18 18/17 24/17 30/7 30/25 33/15 33/20 35/20 36/2 36/24 39/20 39/25 41/9 50/16 50/23 51/12 52/12 53/17 53/22 54/19 55/6 55/21 57/17 57/18 59/21 60/14 65/19 66/3 69/21 69/22 70/8 70/15 71/19 72/21 80/21 82/2 84/12 84/22 84/24 86/8 88/4 88/5 96/15 100/23 101/3 102/7 112/6 115/22 119/2 128/21 135/22 136/6 136/12 137/1 137/3 137/6 137/21 137/24 138/3 149/23 156/16 156/23	oversight [6] 123/22 130/16 130/18 130/20 135/1 135/2
official [29] 131/24 132/14 132/17 132/18 142/1 142/2 142/3 142/3 142/4 142/6 142/12 143/6 143/8 143/22 147/2 147/10 148/15 149/2 150/5 150/10 150/12 150/17 150/23 151/4 151/10 152/9 152/19 152/23 154/6	opening [3] 1/19 6/23 110/2	ordered [1] 121/5	149/23 156/16 156/23	overwhelmed [5] 69/23 70/21 73/10 74/3 74/21
officials [8] 41/14 42/1 42/9 42/10 42/10 80/25 143/12 149/23	open [4] 95/14 134/14 134/16 158/23	ordinary [1] 161/23	outset [1] 80/18	own [14] 14/4 18/8 23/13 46/19 47/25 52/24 60/23 65/21 75/25 117/22 140/4 155/23 156/15 163/7
officials' [1] 41/17	openly [1] 84/8	ordinate [2] 24/12 163/14	outside [2] 83/15 131/9	owner [2] 141/21 141/21
often [3] 38/24 85/11 164/4	openness [3] 155/1 155/8 160/11	ordinated [2] 156/18 156/19	outstanding [9] 3/4 3/10 3/15 3/18 3/25 4/5 4/18 9/19 10/6	owners [1] 146/25
Oh [2] 98/1 139/3	operate [6] 40/5 41/5 52/25 81/14 162/20 163/3	ordination [1] 131/6	outworkings [1] 111/6	ownership [1] 46/17
okay [15] 9/10 20/9 25/24 41/12 74/8 108/2 108/6 113/8 113/18 113/21 124/19 125/25 139/25 148/9 162/15	operation [6] 17/20 17/24 19/9 19/10 24/23 109/25	organisation [2] 152/18 157/25	over [14] 6/4 19/7 44/23 50/19 50/22 52/21 53/23 89/7	
old [2] 39/13 154/18	Operation	organisations [1] 124/3		
Omicron [3] 111/25 112/5 112/17	Yellowhammer [3] 17/20 17/24 19/9	orientate [2] 15/20 33/13		
omits [1] 132/10	operational [5] 13/15 24/9 57/12 90/23 90/25	original [1] 55/7		
omitted [2] 132/19 132/22	operations [1] 25/5	originally [1] 123/9		
on [259]	opinions [1] 77/15	other [47] 1/12 1/18		
	opportunity [2] 93/25 158/6			
	opposed [2] 17/9			

P

pace [1] 86/15
page [41] 5/24 5/25 6/4 6/4 24/1 25/24 26/5 33/12 36/13 36/25 37/2 44/7 44/10 44/23 44/24 45/15 45/22 50/9 53/23 69/19 70/10 71/14 73/5 74/12 74/16 98/23 98/23 100/22 115/21 117/6 126/11 127/7 127/7 128/11 130/10 137/6 137/17 137/22 137/23 149/9 165/2
page 1 [5] 6/4 25/24 71/14 100/22 128/11
page 10 [1] 45/22
page 2 [8] 5/24 5/25 24/1 33/12 44/7 50/9 98/23 127/7
page 3 [3] 44/10 98/23 126/11
page 38 [1] 137/22
page 4 [1] 149/9
page 5 [2] 69/19 117/6
page 6 [3] 36/25 44/24 115/21
page 9 [1] 45/15
palatable [1] 51/15
pandemic [21] 13/12 18/1 18/10 21/4 21/6

P	144/16 151/9 151/13 154/2 157/17 159/14 162/22	142/11	136/22	69/19 73/5 93/13 104/6 104/16 104/20 113/17 115/20 119/17 126/10 126/11 127/7 136/24 136/25 137/22 149/23
pandemic... [16] 21/13 29/4 30/9 37/9 42/5 53/15 59/11 88/4 93/1 95/1 96/22 99/8 102/10 109/14 149/18 153/3	participants [2] 7/11 160/24	perfectly [3] 39/17 40/10 63/21	picture [7] 7/23 59/21 60/9 61/3 101/8 134/22 137/16	plus [1] 33/3
panic [2] 60/3 60/5	particular [11] 27/20 50/16 72/4 85/15 86/15 89/3 102/23 106/2 115/5 142/9 159/6	perform [1] 117/22	piece [4] 48/2 61/22 149/20 159/12	pm [6] 104/7 104/9 104/11 155/15 155/17 164/19
paper [12] 15/5 16/18 17/7 19/1 19/4 19/25 20/3 23/6 23/16 86/6 119/18 154/18	particularly [11] 41/19 43/24 65/18 73/19 85/7 87/8 91/10 111/13 119/23 122/2 162/19	perhaps [37] 5/22 10/9 23/24 33/9 45/22 50/20 53/6 57/2 72/15 85/12 86/5 87/8 91/11 92/23 102/8 107/21 108/11 110/5 111/12 111/17 111/20 112/14 113/6 116/16 118/9 121/22 125/23 129/11 136/3 136/20 137/5 145/4 152/6 155/21 157/25 158/23 161/7	pin [2] 59/19 139/6	point [82] 16/14 19/18 25/8 26/25 28/7 28/13 28/14 29/7 31/2 35/9 36/7 38/7 39/12 41/18 41/24 43/3 44/17 45/3 45/4 47/16 48/9 49/6 49/16 50/7 51/23 52/8 53/18 57/9 58/1 58/6 59/9 59/16 59/20 59/21 60/15 61/5 61/9 62/11 64/7 68/18 69/12 72/4 72/18 72/24 74/25 76/3 76/7 77/20 78/2 78/14 79/8 80/23 81/21 85/4 85/5 86/10 86/17 87/22 87/23 90/2 90/5 90/7 94/25 97/2 100/23 101/25 102/6 103/5 109/13 117/21 121/6 128/5 128/21 133/9 133/9 134/4 135/4 135/22 140/23 150/16 162/11 163/22
papers [8] 4/2 85/11 85/15 85/23 86/2 86/10 86/12 86/18	parties [8] 54/7 77/7 77/10 77/11 85/6 88/25 89/9 112/7	period [28] 5/8 11/14 52/2 59/1 64/16 64/22 66/7 67/16 71/22 75/3 78/22 79/4 79/11 79/22 79/24 80/19 109/6 109/10 110/3 110/16 110/17 111/4 111/14 111/21 116/22 121/25 136/10 136/14	pinpoint [1] 71/2	placed [2] 152/13 152/14
paragraph [28] 2/1 6/6 6/8 7/1 7/1 9/16 9/17 9/18 10/13 10/18 11/1 13/23 15/15 15/23 26/1 36/6 66/13 70/1 71/20 84/15 93/5 115/21 118/23 118/24 119/16 120/18 136/25 137/18	party [6] 61/8 62/8 62/16 62/21 77/8 77/11	permanent [26] 25/14 29/17 42/13 71/17 107/11 107/14 108/9 108/15 108/18 109/3 113/25 114/16 116/8 116/10 118/12 120/13 120/25 123/12 124/5 124/22 125/4 125/8 136/16 141/20 156/7 157/7	place [21] 1/10 1/16 41/14 44/21 55/4 57/24 65/10 73/4 83/25 84/2 88/25 97/22 100/23 102/19 110/9 117/24 131/6 136/19 145/21 153/17 157/17	plainly [1] 5/9
paragraph 127 [1] 136/25	past [2] 99/2 155/13	permanent secretaries [6] 107/14 123/12 124/5 124/22 125/4 156/7	planned [2] 152/13 152/14	planner [1] 95/25
paragraph 129 [1] 137/18	Pathway [1] 65/19	person [3] 76/12 86/23 98/7	planning [34] 14/7 21/6 21/7 21/11 26/9 28/20 32/10 32/12 32/18 33/3 33/21 33/25 34/4 34/20 34/22 34/25 35/9 35/11 35/18 35/21 36/5 36/8 36/10 36/17 36/20 36/22 42/18 44/16 44/21 49/6 49/17 94/20 96/20 101/19	plans [11] 29/2 30/12 30/13 30/25 32/6 33/23 39/2 49/13 49/13 49/15 57/10
paragraph 183 [1] 66/13	Patrick's [1] 99/10	person's [1] 25/18	platform [2] 154/18 156/22	played [1] 111/16
paragraph 22 [1] 15/23	pattern [1] 159/4	personal [5] 8/10 61/12 75/20 88/1 154/3	play [2] 63/16 87/24	please [43] 4/19 5/11 5/12 5/13 5/23 5/24 6/4 8/5 9/8 9/15 9/17 10/16 12/3 13/25 15/10 15/16 24/1 25/24 33/12 33/18 43/5 44/23 45/22 50/9 51/8 61/10 66/19
paragraph 23 [1] 15/15	Paul [2] 127/13 128/2	personally [2] 18/12 52/16	platform [2] 154/18 156/22	political [9] 35/22 62/8 62/21 63/20 63/21 76/6 82/1 99/23 99/25
paragraph 237 [1] 84/15	Paul Givan [1] 127/13	personnel [1] 156/9	platform [2] 154/18 156/22	politically [2] 62/2 62/4
paragraph 340 [1] 93/5	Paul Givan's [1] 128/2	perspective [8] 28/5 32/10 100/18 110/1 141/19 141/20 154/23 160/9	platform [2] 154/18 156/22	politician [2] 61/13 77/3
paragraph 4 [1] 118/23	Pause [2] 16/2 148/5	pertinent [1] 144/7	platform [2] 154/18 156/22	
paragraph 6 [2] 13/23 115/21	pausing [1] 123/8	phase [1] 111/11	platform [2] 154/18 156/22	
paragraph 70 [1] 9/16	peak [2] 44/17 109/14	Phillips [1] 92/10	platform [2] 154/18 156/22	
paragraph 71 [3] 9/18 10/13 10/18	PEARSON [20] 8/2 8/6 8/7 9/7 9/18 15/17 16/14 17/20 23/22 33/19 35/3 44/6 48/23 49/5 50/11 70/17 83/5 98/13 104/2 165/6	phone [5] 128/2 139/6 139/16 140/21 145/16	platform [2] 154/18 156/22	
part [54] 12/23 13/4 13/10 14/22 14/23 16/3 19/8 19/9 21/24 22/16 23/24 24/25 25/18 25/20 25/22 28/7 29/21 34/21 37/15 45/19 50/10 50/16 50/24 54/15 57/5 58/3 60/4 77/22 81/6 81/7 86/17 91/10 91/11 94/20 101/9 106/17 106/18 111/2 111/22 112/4 115/1 119/2 125/20 130/5 130/15 134/19 134/22	Pearson's [1] 83/2	phones [9] 129/15 129/16 130/1 131/17 132/7 140/1 140/10 140/21 146/2	platform [2] 154/18 156/22	
	people [50] 19/8 21/20 22/1 22/15 22/22 22/24 24/15 27/22 28/8 28/12 40/12 42/17 58/20 59/8 62/15 62/17 62/22 62/23 62/24 66/25 67/3 67/11 67/24 75/23 77/13 80/20 82/24 83/15 84/7 86/22 90/24 92/25 94/7 94/10 94/15 94/16 94/17 94/19 95/19 95/21 96/3 96/24 97/25 98/2 112/12 123/23 128/22 129/4 158/1 161/25	phrase [2] 88/2 88/5	platform [2] 154/18 156/22	
	people's [1] 65/14	pick [2] 136/21	platform [2] 154/18 156/22	
	per [1] 71/23		platform [2] 154/18 156/22	
	perception [1]		platform [2] 154/18 156/22	

P	preferable [1] 49/9	problematic [2] 133/2 137/4 139/8	8/3 23/7 38/25 40/3
politicians [12] 62/16	premise [1] 148/14	63/23 102/24	97/1 98/11 98/14
63/12 63/13 63/15	premised [1] 45/12	problems [2] 18/12	98/20 104/1 104/18
63/15 64/5 64/25 77/2	premises [2] 89/18	97/12	106/3 118/5 136/6
82/16 97/4 97/10	89/25	procedure [1] 81/24	160/6 160/15 160/16
97/14	preparation [3] 17/14	proceedings [2] 9/8	160/19 164/6 164/7
politics [2] 61/16	18/15 114/6	104/10	165/8 165/11 165/15
62/16	preparations [5]	process [12] 5/14	165/18
pool [1] 22/20	16/24 17/4 17/16	39/23 76/1 77/24	quickly [2] 67/14
portfolio [1] 51/16	17/19 17/21	86/17 108/21 109/9	103/19
portraying [1] 58/17	prepare [1] 15/14	118/17 123/3 138/21	quite [24] 7/4 22/19
posed [1] 84/14	prepared [3] 16/10	147/7 160/13	30/19 39/5 44/11
position [25] 19/7	30/13 131/3	processes [2] 119/3	44/11 50/2 58/10 59/5
21/9 21/16 49/12	preparedness [4]	141/7	66/15 67/14 76/3
50/20 62/1 64/9 68/2	26/14 26/16 32/6	procurement [1]	76/17 77/9 82/21
68/7 69/17 69/21 79/2	131/1	164/2	88/23 97/2 114/10
80/1 83/2 91/22	present [5] 16/13	produced [3] 47/20	117/3 132/13 148/2
116/24 128/14 129/16	26/9 91/4 97/3 122/13	116/1 129/13	150/9 151/18 160/20
129/25 134/3 138/3	presentations [3]	profession [1]	quote [1] 133/4
147/16 147/24 147/25	46/15 47/20 48/16	106/13	
162/13	presented [3] 21/12	professional [1]	R
position's [1] 71/11	100/11 162/4	106/18	radical [2] 51/14
positions [4] 61/25	preserve [1] 118/20	profoundly [1] 95/23	102/8
77/16 77/17 84/23	pressing [2] 74/3	profusion [1] 155/24	raise [1] 38/14
possession [2] 11/24	89/7	programme [2] 53/1	raised [9] 7/18 98/5
137/10	pressure [1] 74/4	112/3	100/14 130/19 134/24
possibility [1] 28/16	pressures [2] 73/25	Project [1] 16/7	134/25 140/15 160/12
possible [7] 5/15	93/8	prompted [1] 136/3	160/19
10/9 39/17 67/12	presume [1] 51/14	proper [7] 37/22	raises [1] 99/4
94/17 113/1 135/4	previous [1] 74/17	38/14 40/18 53/4	ramp [1] 76/2
possibly [4] 86/8	previously [2] 16/24	119/3 149/3 153/17	ran [1] 127/15
86/10 118/15 144/3	156/4	properly [3] 85/18	range [2] 77/14 94/15
post [12] 30/12 34/24	primacy [1] 163/7	162/3 162/4	rapidly [1] 71/11
109/18 114/10 116/4	primarily [1] 14/2	proportionate [1]	rate [4] 45/1 45/3
121/7 122/6 123/19	principal [1] 126/15	79/19	68/21 70/19
138/9 138/10 138/12	principled [1] 153/13	proposed [5] 15/21	rates [10] 59/7 67/14
142/17	principles [1] 57/17	82/5 82/7 82/13 82/19	67/16 67/23 68/3
posting [1] 12/23	prior [5] 13/7 138/1	proposes [1] 100/18	68/16 70/1 70/19
potential [8] 7/7	138/12 139/11 149/18	proposing [3] 19/1	73/14 109/16
110/2 111/8 114/8	priorities [4] 44/8	76/13 82/24	rather [16] 13/14
117/8 120/8 132/5	55/5 55/6 102/19	prospect [1] 75/6	14/7 22/15 40/25
149/17	prioritise [1] 48/15	prospective [1]	46/13 46/18 69/7 73/3
potentially [5] 60/24	prioritised [1] 37/7	118/2	75/16 83/23 104/13
117/11 124/18 158/21	priority [4] 25/11	protect [1] 71/22	112/14 126/24 137/2
159/2	59/2 59/3 63/1	protection [4] 48/7	151/25 158/22
poverty [1] 94/16	private [14] 106/15	81/7 82/21 94/16	ratified [1] 53/8
power [10] 50/18	118/9 118/19 119/5	protocol [1] 39/13	rational [3] 72/8
107/14 107/22 138/4	126/15 138/6 138/6	prove [1] 78/5	132/9 160/7
163/14 163/18 163/20	138/11 139/1 140/4	provide [17] 4/19	reach [4] 31/12 69/6
163/25 164/3 164/4	141/22 143/1 146/24	7/10 46/9 46/20 47/1	69/17 80/24
power-sharing [1]	147/9	110/19 112/23 123/18	reached [7] 48/7 48/9
138/4	private office [5]	143/15 152/13 153/19	51/23 52/8 68/8 69/21
PPE [1] 61/2	118/9 138/11 141/22	153/24 154/22 156/12	109/14
practice [1] 157/5	146/24 147/9	156/21 157/14 162/23	react [1] 66/25
pre [2] 101/19 103/12	private offices [4]	provided [54] 1/13	read [8] 36/10 53/17
pre-plan [1] 103/12	119/5 138/6 138/6	1/19 2/6 2/25 3/12	54/19 72/11 72/21
pre-planning [1]	143/1	6/22 9/20 11/4 11/23	85/18 124/10 134/20
101/19	proactive [1] 87/20	48/12 84/9 109/9	read-out [3] 53/17
precise [3] 6/21	probably [12] 33/13	115/14 116/2 116/3	54/19 72/21
28/11 137/14	34/23 40/20 67/18	116/19 116/25 117/2	readiness [1] 18/9
precisely [2] 128/23	67/19 68/2 115/18	117/18 117/18 118/1	reading [2] 118/24
129/5	143/20 144/18 145/6	123/15 123/20 123/25	133/17
preclude [1] 134/7	150/8 161/21	124/5 124/14 124/16	reads [1] 27/6
	problem [1] 100/14	124/21 125/6 125/14	ready [3] 28/16 33/23

R				
ready... [1] 114/2	recorded [4] 76/18	142/14	64/3 64/6 64/8	139/16
real [9] 18/6 19/16	85/16 145/17 145/24	regular [2] 83/23	request [6] 2/24 4/23	rest [5] 16/9 19/15
20/14 53/11 55/25	recording [2] 149/3	122/5	118/14 123/5 135/23	23/20 65/21 73/22
66/21 74/11 112/14	153/17	regularly [1] 85/16	136/5	restrictions [30] 41/2
163/6	records [12] 5/13	regulations [5] 87/4	requested [1] 4/8	58/10 65/17 65/19
realised [1] 59/16	5/14 114/3 118/20	87/10 87/13 89/3	requesting [2]	66/2 66/4 66/10 66/20
realistic [4] 60/16	142/3 142/3 147/2	89/14	122/20 122/20	66/24 67/4 67/5 67/6
60/20 72/5 72/21	147/3 147/4 149/7	reintroduction [1]	requests [9] 2/15 5/3	67/11 67/15 68/8
reality [3] 19/7 67/10	149/11 154/19	75/18	6/1 6/18 7/2 24/20	68/12 69/12 69/14
133/17	recovery [1] 111/11	reiterated [1] 122/15	103/11 158/11 158/12	72/18 75/4 75/18
really [27] 20/10 37/8	red [1] 48/14	reiterating [2] 120/7	require [3] 80/5	75/23 76/13 79/6 79/9
42/4 42/25 51/12 65/1	redacted [1] 7/15	120/23	112/6 153/23	79/14 79/20 80/14
65/22 69/1 70/3 70/5	reduced [1] 133/3	rejected [1] 78/23	required [5] 65/3	93/2 112/21
70/19 76/19 80/19	reductive [1] 134/13	relation [5] 20/13	115/2 115/6 115/15	retain [2] 120/25
87/22 92/6 93/20	refer [5] 10/22 20/22	99/8 123/5 129/19	144/2	123/14
94/18 95/17 99/7	33/25 93/11 113/19	158/16	requirement [3]	retained [8] 120/9
99/18 100/1 100/5	reference [27] 3/13	relaxed [1] 21/2	22/11 91/15 145/18	124/23 138/10 138/25
101/20 111/9 134/5	6/3 6/10 26/18 27/1	relevance [5] 114/8	requirements [4]	139/4 139/12 146/16
149/1 150/22	56/7 56/25 58/18	116/13 116/14 117/8	114/2 142/11 143/11	147/20
realtime [2] 41/4	59/14 60/10 60/11	120/8	157/24	retaining [1] 121/10
49/14	69/22 85/22 110/21	relevant [8] 114/3	requires [2] 33/4	retention [4] 139/5
reason [1] 133/24	112/16 116/18 118/21	117/11 117/12 118/21	156/17	143/3 157/25 158/3
reasonable [6] 34/9	119/22 121/20 131/17	144/20 144/22 144/25	reset [14] 127/19	return [1] 48/24
34/14 34/18 36/9	131/22 132/10 132/20	145/11	128/2 129/16 132/5	returned [8] 129/16
129/18 160/25	132/22 133/3 133/4	relied [1] 18/13	132/10 132/20 133/8	138/5 138/11 138/16
reasons [2] 65/13	161/8	relieved [1] 74/1	133/18 135/12 139/11	139/11 140/11 141/9
142/9	referenced [3] 107/8	reluctance [1] 28/5	139/13 142/23 142/24	142/22
recall [5] 20/1 31/3	116/12 136/15	rely [1] 19/22	158/17	returning [1] 138/1
41/19 64/12 74/16	references [4] 22/1	remained [2] 3/4	resides [1] 157/6	reveal [1] 158/23
receive [1] 85/11	24/6 87/7 88/25	13/9	resolve [1] 129/1	revealing [1] 134/22
received [3] 2/24	referred [12] 1/9 4/1	remains [2] 37/21	resources [3] 31/13	review [13] 15/21
121/9 149/12	12/11 14/13 14/25	141/6	39/20 41/3	16/19 17/15 19/1
recent [1] 20/19	20/22 22/18 45/1	remarks [1] 7/17	respect [11] 1/10 4/9	19/23 23/9 23/10
recognise [1] 147/18	73/15 120/16 120/24	remember [4] 23/7	5/2 21/13 26/20 52/9	23/17 39/25 40/12
recognised [1]	135/12	73/12 88/10 88/12	74/12 82/8 127/9	40/14 48/6 48/9
155/20	referring [13] 14/17	remembering [1]	128/6 155/21	reviewed [1] 23/18
recognises [1]	17/19 17/24 18/21	88/11	respond [5] 17/11	revisit [1] 98/16
150/25	102/18 118/23 126/18	remembers [1] 54/10	24/18 31/2 115/3	RHI [3] 117/25 155/2
recognising [3] 86/1	127/12 127/21 130/22	remind [2] 30/18	160/18	155/7
86/2 103/8	134/8 143/22 152/16	55/15	responded [1] 27/19	rhythm [1] 109/25
recognition [1] 150/8	refers [3] 9/21 24/4	remit [1] 42/21	responding [4] 13/12	right [117] 8/13 9/2
recollect [1] 1/7	148/18	removal [1] 52/17	30/9 37/9 53/25	9/9 9/18 10/24 11/7
recollection [2]	reflect [3] 34/1	remove [1] 5/15	response [39] 2/24	12/5 12/10 12/12
29/15 98/3	107/22 133/10	removing [1] 51/24	5/3 16/17 19/25 22/16	12/18 13/12 13/17
recommendation [7]	reflected [3] 109/19	repeat [1] 60/11	23/23 25/25 26/2	14/23 17/11 23/3
16/19 23/9 75/1 75/19	114/25 129/14	repeated [2] 124/3	27/25 29/21 30/21	25/20 27/6 29/9 29/18
78/22 157/13 162/5	reflection [1] 54/21	158/11	31/16 33/23 36/15	29/21 29/25 35/19
recommendations	reflections [1]	replacement [1]	36/17 37/16 39/11	38/7 40/8 40/23 41/1
[1] 16/6	162/19	109/4	39/15 41/4 41/8 43/12	41/24 43/17 49/23
recommended [1]	refresh [1] 33/22	replies [1] 71/10	43/13 43/16 43/24	51/1 52/18 54/24
161/19	refugee [1] 122/4	reply [3] 54/24 55/1	49/14 51/7 51/9 53/15	57/25 60/6 60/13 61/6
recommending [1]	regarded [3] 20/11	100/22	57/1 57/3 57/7 58/1	61/24 62/3 63/7 64/20
17/15	63/8 132/25	report [7] 137/3	93/7 102/10 113/13	65/24 66/3 66/12
recompense [1] 22/9	regarding [7] 112/6	140/19 140/20 141/17	113/14 130/4 130/11	66/17 67/13 67/18
reconcile [1] 39/5	117/20 123/21 124/1	142/20 160/17 164/2	153/3	67/22 67/25 68/2
record [13] 131/18	131/23 133/8 144/6	reporting [1] 53/20	responses [2] 32/24	68/16 70/17 71/9 72/1
131/19 131/24 134/15	regardless [1] 82/11	reports [1] 154/9	141/25	72/20 73/20 74/24
142/4 143/6 144/6	regards [4] 85/9	representation [2]	responsibilities [3]	76/3 76/17 77/15
145/4 146/23 147/10	85/10 94/18 128/15	130/23 130/24	55/11 108/11 118/12	77/18 78/20 78/25
152/9 152/15 155/8	region [1] 75/15	representative [3]	responsibility [5]	79/13 80/5 80/18 81/8
record-keeping [2]	register [1] 95/7	2/18 2/23 3/2	47/18 108/22 118/5	83/10 84/11 86/19
134/15 155/8	regret [3] 154/12	representatives [2]	144/16 147/8	88/21 89/9 90/24
	154/16 155/4	89/12 96/14	responsible [5] 54/3	104/22 105/1 106/6
	regrettably [1]	Republic [4] 63/14	54/8 54/17 139/15	107/3 107/6 108/25

R	run [3] 42/5 51/19 162/20 run-up [1] 42/5 running [2] 39/18 127/25 rush [1] 71/20	scarring [1] 111/8 scenario [5] 34/10 34/14 34/18 36/9 154/11 scenes [1] 80/25 scepticism [1] 77/21 schedule [3] 3/12 3/19 4/3 schedules [1] 158/4 schism [1] 61/24 school [1] 97/13 schools [10] 52/3 62/1 63/10 63/25 64/5 65/4 97/4 97/9 97/16 97/19 science [2] 77/22 78/17 scientific [2] 71/9 79/25 scope [3] 149/9 161/24 162/5 Scotland [4] 107/11 117/21 161/16 161/19 scrabbling [1] 21/22 screen [6] 1/22 5/22 9/16 10/10 15/17 129/25 scroll [1] 51/8 search [3] 2/8 2/12 139/8 second [10] 2/1 6/25 9/24 16/1 66/15 66/21 71/19 118/24 137/16 159/12 secondment [2] 12/17 109/9 secretaries [18] 25/14 42/13 107/11 107/14 113/25 114/16 116/8 116/10 118/13 120/14 120/25 123/12 124/5 124/22 125/4 125/9 126/15 156/7 secretary [11] 4/11 29/17 71/17 108/9 108/16 108/19 112/2 112/7 136/16 141/20 157/8 sectarianise [1] 63/19 sectarianised [1] 63/11 section [4] 94/10 95/9 102/22 149/22 section 75 [2] 94/10 95/9 section 8 [1] 149/22 sector [5] 33/22 33/24 89/12 96/14 106/15 sectors [1] 75/25 secure [3] 154/21 154/23 156/25 security [1] 119/8	see [73] 2/2 2/7 6/1 6/2 6/9 7/21 10/4 10/17 13/9 15/23 19/24 24/1 24/17 26/4 26/13 28/13 28/24 30/18 33/14 33/20 34/17 35/21 36/4 36/21 37/2 38/11 43/6 47/12 50/7 50/7 50/14 50/24 51/12 52/18 53/21 55/1 56/25 57/21 58/6 60/15 66/8 67/19 68/19 69/22 71/8 71/14 71/19 73/5 77/20 78/5 79/12 83/8 84/1 84/18 98/24 99/1 99/20 100/20 113/17 115/20 115/22 121/17 121/20 126/11 126/13 128/10 130/9 136/18 146/12 153/3 159/4 161/21 161/24 seeing [4] 60/8 62/11 101/7 111/6 seeker [1] 122/4 seeking [1] 133/5 seem [3] 43/1 97/10 97/14 seemed [3] 88/22 141/25 155/23 seen [21] 22/1 24/20 30/17 30/18 49/22 50/10 50/11 53/25 75/24 111/13 114/5 114/11 114/13 114/14 115/4 145/1 145/13 151/23 152/6 152/11 157/19 self [1] 46/1 self-isolating [1] 46/1 send [1] 67/10 sending [1] 86/12 senior [9] 14/19 25/14 25/19 71/4 132/17 132/18 144/12 146/12 157/11 sense [19] 19/21 19/22 20/16 26/20 27/13 29/7 53/11 56/24 57/2 57/5 59/4 60/3 71/5 74/5 74/6 74/11 74/11 142/7 161/21 senses [1] 157/22 sensitive [2] 83/14 161/12 sensitivity [1] 134/10 sent [22] 1/23 5/2 6/25 10/5 10/20 33/14 51/7 69/20 71/3 99/2 114/12 116/9 119/11 119/11 120/12 122/19 126/12 126/13 136/5 138/6 138/17 141/10 sentence [1] 9/24 separate [7] 20/7 76/6 119/13 125/16 140/1 156/15 161/13 separated [1] 77/15 September [9] 68/6 74/15 106/9 109/3 109/12 110/17 111/24 115/13 135/24 September 2020 [1] 109/3 September 2022 [1] 135/24 series [4] 47/20 102/21 129/8 135/10 serious [1] 59/23 servant [4] 51/10 81/21 83/3 84/5 servants [12] 13/4 14/19 25/15 42/4 52/15 63/7 130/4 130/10 144/13 146/13 156/24 157/15 service [39] 12/6 12/11 12/21 12/25 18/23 24/16 27/16 53/19 70/20 73/10 74/3 74/21 106/7 107/5 107/7 107/10 107/13 108/5 108/24 109/7 109/8 109/19 110/13 111/16 114/20 116/20 116/22 118/4 154/12 154/17 156/6 156/24 157/13 160/1 161/14 162/2 162/11 162/17 163/23 services [3] 96/6 156/10 158/2 servicing [2] 83/3 84/4 set [51] 2/7 2/14 2/20 3/3 3/19 4/3 4/5 4/21 5/1 5/5 5/6 16/18 18/17 24/16 25/6 25/7 30/7 33/15 33/20 34/4 35/8 35/11 35/20 36/2 36/14 36/24 49/15 53/22 55/6 55/21 57/17 57/18 63/12 65/20 66/3 69/22 70/8 84/12 91/19 91/22 115/22 118/16 119/2 137/1 137/3 137/6 138/3 141/14 150/22 150/22 159/13 sets [6] 5/25 50/16 51/12 71/19 137/21 137/24 setting [10] 2/18 3/24 4/14 30/25 52/12 69/21 70/15 136/6 149/23 152/22 several [1] 66/23
----------	--	---	---

S	75/17 93/15 110/3 110/25 122/1 141/12 147/6 153/7 154/4 158/6 159/20 162/9 163/8 163/21 significantly [1] 101/16 signing [1] 11/17 signs [1] 100/15 similar [1] 161/19 simple [3] 44/11 100/16 148/21 simplistic [6] 66/19 69/10 76/5 76/15 76/20 77/5 simplistically [1] 76/24 simply [3] 78/1 78/9 141/9 since [1] 153/21 single [3] 31/11 55/19 84/25 Sinn [2] 51/17 63/13 Sinn Féin [1] 63/13 Sir [18] 31/9 42/12 50/14 53/17 53/23 61/21 63/22 64/23 83/8 85/13 98/17 98/25 99/4 100/13 107/6 108/7 108/12 109/1 Sir David [16] 31/9 42/12 50/14 53/23 61/21 63/22 64/23 83/8 85/13 98/25 99/4 100/13 107/6 108/7 108/12 109/1 Sir David's [1] 53/17 sit [3] 35/11 38/8 91/6 sits [2] 138/24 141/20 sitting [3] 35/8 77/25 91/3 situation [7] 16/12 18/13 59/20 59/20 67/7 79/16 117/20 situation's [1] 56/20 six [10] 11/16 35/20 55/5 55/6 75/2 75/3 75/3 75/19 78/22 80/5 six months [2] 11/16 75/3 six weeks [2] 75/19 80/5 size [2] 19/23 20/6 sleep [1] 100/19 slightly [5] 76/16 98/22 99/6 108/7 131/2 slipping [1] 139/14 slow [2] 53/4 154/17 slowly [1] 113/7 small [3] 19/17 20/6	60/13 snapshot [1] 52/6 so [239] social [10] 67/1 71/24 88/24 89/17 97/15 98/3 150/11 151/2 151/12 152/1 society [6] 16/10 77/1 93/1 94/15 94/19 96/24 soft [2] 164/3 164/3 solely [3] 10/2 46/14 92/7 solicitor [8] 2/17 2/21 2/22 3/1 3/17 3/23 4/4 4/14 Solicitor's [2] 1/24 115/24 solution [4] 102/12 102/14 102/16 112/5 solutions [4] 102/13 103/1 153/21 154/2 some [68] 2/14 9/14 18/11 22/8 23/2 24/9 24/20 25/16 27/7 27/9 28/14 34/22 36/24 46/4 50/4 52/13 52/19 53/19 55/4 56/2 57/17 64/5 65/12 66/9 72/7 77/22 77/25 83/9 84/12 84/18 86/23 89/9 89/25 90/1 91/18 93/11 93/25 95/6 95/9 96/15 101/1 102/18 103/14 106/3 108/11 111/16 111/25 113/19 125/19 126/24 127/19 128/4 138/4 138/16 144/8 144/14 146/4 146/13 149/5 151/16 151/18 153/3 153/6 154/16 156/12 157/14 157/22 159/14 somebody [2] 89/15 163/13 someone [7] 30/18 32/10 37/10 51/9 88/19 98/9 118/8 something [27] 11/21 22/5 22/10 23/17 40/3 41/3 49/21 58/24 65/4 70/24 75/15 78/13 79/12 79/21 80/15 85/23 86/14 89/15 110/12 129/1 133/24 134/8 134/9 151/2 156/2 158/20 158/21 sometimes [1] 85/17 somewhat [2] 107/5 164/13 somewhere [1] 152/22 sorry [22] 8/1 15/17	17/3 44/22 48/12 53/24 56/10 56/16 56/22 69/25 74/9 82/2 82/25 88/3 95/15 98/8 98/23 101/21 104/16 115/21 139/3 147/23 sort [22] 14/7 20/17 21/11 22/9 22/23 30/8 32/6 32/24 48/3 57/22 66/4 66/9 71/4 78/6 79/14 81/18 95/10 110/19 111/16 112/10 150/22 152/1 sort of [16] 14/7 20/17 21/11 22/9 22/23 32/6 48/3 57/22 66/9 78/6 81/18 95/10 110/19 111/16 150/22 152/1 sorts [2] 151/13 159/2 sought [1] 158/10 sound [2] 26/18 88/3 sounded [1] 73/7 space [6] 31/11 69/6 72/12 91/1 93/24 103/10 SpAd [1] 130/1 SpAds [2] 127/22 143/11 spared [1] 64/25 speak [6] 63/12 65/6 82/1 84/8 109/23 113/6 speaking [1] 84/20 special [6] 116/5 126/19 142/25 143/18 145/22 150/2 specific [37] 4/16 6/20 14/8 14/11 17/23 20/1 22/19 25/17 26/24 31/8 31/15 32/19 42/17 42/21 46/14 48/16 49/21 50/6 60/8 60/23 60/23 68/13 88/22 89/5 90/9 103/1 103/6 103/11 110/17 123/5 136/6 150/10 152/11 157/23 158/10 159/5 160/4 specifically [11] 3/25 4/10 9/21 14/17 17/19 37/23 87/3 115/9 122/20 122/23 127/14 specifics [2] 128/4 137/25 speed [1] 86/11 spend [2] 50/2 135/9 splits [1] 69/10 spoken [3] 28/8 28/12 71/4 spread [1] 42/6 St [1] 99/10 St Patrick's [1] 99/10	stabilisation [1] 57/13 stabilise [2] 18/25 20/5 stabilised [1] 56/21 stability [1] 163/10 staff [9] 18/14 18/21 19/5 22/4 22/12 24/18 123/18 123/20 141/22 staffing [2] 14/6 18/25 stage [11] 29/1 49/10 58/22 59/22 70/7 70/18 99/22 108/20 123/2 128/15 135/21 stages [1] 94/21 stake [1] 75/13 stand [2] 25/1 41/23 stand-up [1] 25/1 standing [3] 28/6 28/9 28/9 stark [1] 69/2 start [12] 12/3 21/21 23/10 24/1 28/5 41/1 68/22 76/2 97/25 106/5 109/3 158/14 started [7] 7/12 12/6 12/22 66/20 67/14 67/24 100/24 starting [9] 28/13 29/6 36/7 36/15 68/23 78/5 87/22 87/23 90/2 starts [1] 72/9 state [3] 18/2 18/9 139/13 stated [2] 116/15 155/2 statement [54] 1/3 8/13 8/20 8/20 8/25 9/4 9/13 10/13 10/18 10/22 11/8 11/17 11/20 13/24 14/17 14/25 15/4 15/14 19/20 22/3 22/10 32/2 32/5 37/19 40/10 47/8 49/7 57/16 61/11 65/9 66/13 68/7 69/2 74/25 75/6 79/10 84/12 84/16 92/18 93/4 105/8 105/14 105/17 105/22 109/20 112/16 120/17 135/25 136/21 137/2 137/7 137/22 161/17 165/3 statement's [1] 8/16 statements [9] 8/8 84/22 104/23 105/11 106/1 124/10 132/12 140/5 145/14 stating [3] 37/13 99/18 101/13 stay [1] 12/20 stemming [1] 100/23 step [1] 88/17
----------	---	--	--	---

S	subcommittee [1] 53/4	101/20 103/12 108/14 114/5 119/6 122/7 122/10 145/7 147/13 150/15 154/1	talked [4] 22/6 156/22 156/22 162/7	134/19 135/5 136/13 138/4 138/21 142/4 142/10 142/15 142/19 143/2 143/3 143/5 143/16 145/13 145/19 147/7 147/16 152/14 152/15 152/19 153/19 153/20 154/21 154/25 155/1 156/2 160/3 160/11 161/8 161/8
stepped [1] 121/24	subject [3] 69/1 131/21 149/3	surprise [11] 2/3 2/14 26/3 56/3 56/6 58/12 59/5 59/13 59/15 60/12 101/6 41/19	talking [10] 15/24 17/8 36/19 53/19 61/21 91/4 93/25 97/14 150/11 152/16	test [1] 151/6
stepping [2] 90/24 161/20	submission [1] 119/14	surprised [2] 41/16 41/19	talks [1] 134/14	tests [1] 79/18
steps [10] 2/8 11/9 88/16 95/2 95/6 102/19 114/1 129/18 158/23 159/17	submissions [1] 133/2	surprising [4] 42/5 42/23 110/16 157/19	tandem [1] 39/19	text [1] 146/6
Sterling [2] 41/22 52/1	submitting [1] 86/2	Swann [6] 43/20 76/12 78/4 80/1 85/9 91/4	task [1] 39/20	than [27] 13/15 14/7 22/15 22/23 32/21 38/22 40/25 46/13 46/18 54/11 54/22 61/17 67/4 69/7 75/16 83/23 92/23 93/8 98/2 102/15 104/13 110/5 112/14 124/15 137/2 152/1 158/22
Stewart [8] 15/6 15/23 17/15 21/22 25/25 27/9 30/20 114/24	subsequent [4] 105/11 120/2 131/21 131/25	swathes [1] 144/10	tasked [1] 41/9	thank [39] 7/13 7/14 8/12 8/19 9/11 10/12 11/19 12/1 33/18 44/24 48/23 49/4 51/8 69/24 83/5 98/7 98/12 103/24 103/25 104/2 104/4 104/15 104/16 105/7 113/10 120/3 130/9 137/6 137/20 137/23 146/1 149/9 150/20 161/10 164/5 164/8 164/9 164/16 164/18
Stewart's [2] 23/6 23/13	substance [1] 133/7	sworn [4] 1/5 7/25 104/17 165/13	taskforce [1] 95/4	thank you [30] 7/13 8/12 8/19 10/12 11/19 12/1 44/24 48/23 49/4 51/8 69/24 83/5 98/7 98/12 103/24 103/25 104/4 104/15 104/16 105/7 113/10 120/3 130/9 137/6 137/20 137/23 146/1 149/9 150/20 161/10 164/5 164/8 164/9 164/16 164/18
stick [1] 96/11	substantive [1] 153/5	synthesised [1] 162/4	taught [1] 32/23	that [1377]
still [16] 3/16 3/25 44/20 48/18 49/15 65/16 67/2 67/2 67/8 67/9 83/3 122/6 127/24 139/12 155/3 155/6	such [7] 5/14 14/6 35/6 36/21 49/11 150/18 150/23	system [18] 32/23 61/19 142/4 143/16 144/15 145/16 146/9 146/19 147/1 147/3 153/22 154/9 154/19 157/3 157/9 161/19 162/7 163/12	team [14] 2/4 7/22 19/17 19/23 20/6 22/5 23/24 28/7 55/24 58/12 101/1 126/6 127/2 160/23	that's [197]
stood [10] 26/23 27/25 28/1 28/3 28/12 28/15 41/20 41/24 43/2 139/4	suffering [2] 62/17 161/25	systems [5] 131/20 147/9 147/14 150/6 153/24	teams [3] 118/18 119/8 124/3	their [63] 19/4 28/8 31/13 31/14 31/14 38/19 46/19 47/25 48/19 57/5 57/18 59/2 59/2 59/8 60/22 62/8 62/10 62/16 62/25 65/21 75/25 75/25 77/12 82/11 86/13 89/23 90/22 96/4 97/11 107/15 107/19 114/2 114/18 117/22 118/6 118/8 118/10 118/10 118/18 119/4 122/8 125/4 125/19 133/2 133/12 134/22 138/5 138/5 138/16 138/16 138/17 139/12
stop [8] 9/8 56/4 61/13 97/22 107/25 113/17 117/3 118/22	suffices [1] 6/16	table [3] 4/7 80/20 84/7	technology [5] 153/21 154/16 154/17 154/23 156/22	
storage [2] 5/15 154/22	sufficient [3] 33/5 143/2 151/3	tailor [2] 20/25 53/21	tell [7] 22/21 61/10 78/5 80/15 81/6 96/15 113/5	
stored [6] 5/13 5/14 37/7 131/14 131/19 139/1	suggest [7] 23/16 39/7 53/11 80/21 94/22 132/17 133/25	take [32] 6/9 30/24 38/11 39/19 39/19 43/6 45/16 47/19 49/7 49/20 51/15 51/20 51/24 52/12 56/2 64/9 73/13 83/25 93/10 95/17 95/23 113/15 114/1 116/13 135/5 138/15 139/5 141/19 149/20 153/16 155/13 159/16	telling [2] 41/7 132/22	
storey [1] 1/17	suggested [5] 2/3 18/2 64/21 74/25 151/16	taken [26] 1/16 2/8 11/3 11/9 16/5 40/7 41/14 58/12 59/4 59/5 60/12 62/1 64/13 65/13 77/2 90/1 90/12 97/7 97/10 114/24 120/3 129/18 132/11 136/19 138/14 158/23	tempting [1] 51/17	
storm [1] 102/6	suggesting [13] 27/4 28/15 52/19 60/22 60/22 62/18 62/20 63/1 75/14 78/12 80/22 128/5 143/24	taker [4] 6/11 6/13 10/3 11/3	ten [3] 73/9 100/12 102/5	
straight [1] 22/11	suggestion [4] 2/13 6/12 52/16 149/15	takes [4] 34/18 42/1 96/1 97/21	ten days [3] 73/9 100/12 102/5	
strategic [8] 15/21 30/7 31/6 39/3 44/8 68/25 109/10 111/9	suggestions [2] 52/11 102/7	taking [14] 6/11 34/24 36/17 40/13 44/21 56/5 65/21 84/2 88/25 95/2 101/6 115/1 134/3 138/12	tension [4] 64/18 69/1 69/7 112/15	
strategic [8] 15/21 30/7 31/6 39/3 44/8 68/25 109/10 111/9	suggests [1] 52/22	talk [2] 95/11 157/5	tensions [7] 51/2 68/19 68/23 68/24 76/2 76/6 146/11	
strategy [14] 31/17 43/4 43/11 43/17 52/22 53/1 66/2 66/3 79/15 88/6 88/15 89/23 90/19 90/22	suite [2] 30/12 30/13		TEO [36] 2/18 2/23 3/2 3/21 3/24 4/4 4/14 5/3 5/7 6/18 6/25 8/19 14/5 14/17 16/23 29/21 91/8 108/18 108/20 118/8 122/21 122/22 126/3 126/5 130/1 130/5 131/4 135/10 136/6 136/12 138/9 138/22 138/25 140/24 141/7 159/2	
strategy [14] 31/17 43/4 43/11 43/17 52/22 53/1 66/2 66/3 79/15 88/6 88/15 89/23 90/19 90/22	summarising [2] 50/18 52/20		TEO's [2] 3/4 113/12	
stratified [1] 66/4	summary [4] 30/10 30/20 30/25 80/7		term [5] 25/4 36/18 95/18 96/4 152/8	
strict [1] 92/24	summer [2] 68/1 109/15		terms [65] 7/2 22/8 35/19 42/12 47/2 53/10 59/16 69/14 69/17 71/21 77/5 94/12 99/7 107/15 109/1 110/7 111/24 111/25 113/12 116/14 118/10 118/21 118/22 123/9 124/4 124/5 124/11 124/15 125/1 125/2 126/1 130/16 131/7 132/9 133/22	
strings [1] 144/11	Sunday [1] 74/18		ten [3] 73/9 100/12 102/5	
strong [2] 24/14 36/14	supplant [3] 39/16 39/21 40/14		ten days [3] 73/9 100/12 102/5	
structural [1] 50/4	supplies [1] 61/2		tend [1] 53/11	
structure [9] 25/20 25/22 26/23 42/24 58/15 61/19 94/25 109/25 130/16	support [4] 39/23 90/8 90/13 163/24		tension [4] 64/18 69/1 69/7 112/15	
structured [1] 57/23	supported [1] 124/1		tensions [7] 51/2 68/19 68/23 68/24 76/2 76/6 146/11	
structures [9] 24/18 37/22 53/20 108/23 110/4 110/8 117/23 131/5 162/18	supporting [1] 117/25		TEO [36] 2/18 2/23 3/2 3/21 3/24 4/4 4/14 5/3 5/7 6/18 6/25 8/19 14/5 14/17 16/23 29/21 91/8 108/18 108/20 118/8 122/21 122/22 126/3 126/5 130/1 130/5 131/4 135/10 136/6 136/12 138/9 138/22 138/25 140/24 141/7 159/2	
struggling [1] 100/16	supports [1] 33/8		terms [65] 7/2 22/8 35/19 42/12 47/2 53/10 59/16 69/14 69/17 71/21 77/5 94/12 99/7 107/15 109/1 110/7 111/24 111/25 113/12 116/14 118/10 118/21 118/22 123/9 124/4 124/5 124/11 124/15 125/1 125/2 126/1 130/16 131/7 132/9 133/22	
style [1] 31/10	suppose [5] 18/7 21/1 41/20 90/8 112/12		that [1377]	
	supposed [2] 46/20 48/5		that's [197]	
	sure [23] 15/13 33/13 38/3 38/3 44/6 46/2 47/19 53/24 89/13 90/15 92/13 96/8		thank you [30] 7/13 8/12 8/19 10/12 11/19 12/1 44/24 48/23 49/4 51/8 69/24 83/5 98/7 98/12 103/24 103/25 104/2 104/4 104/15 104/16 105/7 113/10 120/3 130/9 137/6 137/20 137/23 146/1 149/9 150/20 161/10 164/5 164/8 164/9 164/16 164/18	

T
their... [11] 140/4
 141/4 142/10 143/18
 145/15 145/18 145/19
 145/20 149/13 155/23
 163/7
them [79] 5/12 5/15
 6/11 7/10 24/10 37/10
 46/12 46/15 46/17
 46/20 47/1 47/12
 47/20 48/14 56/1 56/2
 56/5 56/9 56/10 56/25
 56/25 58/11 58/18
 58/23 59/4 59/15 62/8
 62/9 63/23 65/2 65/8
 65/16 71/6 83/22 85/1
 85/10 86/1 86/2 89/16
 95/3 101/4 101/6
 102/21 103/3 103/4
 104/24 106/2 116/10
 117/19 118/2 118/4
 118/6 118/20 119/14
 119/18 122/8 123/13
 124/9 124/14 125/2
 125/19 132/13 133/20
 138/17 138/18 138/19
 138/21 141/9 146/5
 146/13 146/14 151/12
 153/5 153/18 153/22
 154/10 158/12 162/3
 163/25
theme [1] 77/20
themselves [3]
 116/11 118/14 125/2
then [109] 12/17
 12/20 19/25 20/24
 23/22 25/13 26/10
 27/1 27/21 29/9 29/23
 30/11 30/24 31/4
 32/15 35/19 36/2
 40/13 43/4 44/10
 44/16 45/17 46/15
 48/4 48/17 49/6 49/20
 50/1 51/23 52/4 54/15
 55/21 56/12 63/23
 64/15 65/3 65/25
 66/25 68/5 68/19 70/8
 70/12 70/15 71/14
 71/19 71/21 74/24
 77/11 79/8 80/8 80/15
 88/14 89/5 90/9 90/21
 94/10 94/18 100/22
 101/3 103/18 105/11
 105/17 106/15 109/4
 110/1 110/24 113/11
 113/11 113/12 114/10
 114/23 115/12 115/13
 116/16 116/20 116/25
 117/2 117/8 118/1
 118/6 119/6 120/2
 120/4 121/13 122/19
 127/2 128/6 128/18
 128/18 130/20 131/1

131/4 131/13 131/14
 135/15 135/16 135/21
 136/5 136/10 136/11
 136/20 141/22 147/3
 147/16 149/20 150/8
 150/12 150/15 159/15
theoretical [2] 18/5
 20/13
there [208]
there's [36] 18/7 21/8
 22/7 26/20 40/16 42/6
 47/4 52/1 59/23 66/23
 74/4 77/7 78/12 78/14
 85/22 87/11 88/14
 88/24 107/21 121/7
 121/13 122/11 129/8
 132/2 134/7 141/17
 143/20 147/23 149/6
 149/15 151/12 153/12
 154/24 155/24 162/5
 163/2
thereafter [2] 12/20
 103/19
therefore [2] 38/16
 150/17
these [28] 4/20 5/8
 5/10 5/13 6/1 22/14
 26/22 26/22 27/10
 27/14 28/6 35/4 37/8
 52/12 61/25 101/10
 103/2 121/22 124/21
 130/13 131/9 131/13
 131/14 146/2 146/4
 152/21 155/1 155/6
they [165] 1/12 1/21
 2/5 2/7 4/15 5/17 6/12
 6/12 6/22 24/16 25/7
 25/14 25/14 26/7 26/8
 27/14 27/17 31/13
 35/9 35/12 35/17
 37/11 38/18 38/19
 46/21 46/24 47/2
 47/13 47/14 47/21
 48/15 49/15 49/17
 51/15 51/16 51/20
 52/12 53/13 54/2 54/9
 54/17 55/25 56/11
 57/2 57/12 57/21 58/5
 58/9 58/16 58/24 59/2
 59/4 59/6 59/7 59/8
 59/12 59/13 59/16
 60/12 60/13 60/14
 60/19 60/22 61/2 62/7
 63/8 63/20 65/1 65/3
 65/5 65/19 65/20
 65/21 66/6 73/17
 73/25 74/3 75/20
 75/21 76/1 77/11
 77/15 78/3 79/22
 79/23 79/24 80/22
 82/7 82/13 84/2 84/7
 84/24 85/10 85/14
 86/8 86/8 86/16 87/10
 87/20 88/6 88/7 88/8

89/13 89/24 90/18
 90/20 90/21 101/6
 103/10 112/8 113/3
 116/13 117/21 123/13
 124/13 128/2 130/14
 130/15 131/11 133/2
 133/2 133/3 133/4
 133/5 138/7 138/16
 138/18 139/1 139/4
 139/12 139/12 139/13
 140/3 140/11 140/12
 141/9 143/12 145/10
 145/15 145/20 145/21
 145/23 146/3 151/9
 151/10 151/15 151/16
 151/20 151/21 151/22
 152/16 152/23 152/23
 153/5 153/6 154/14
 156/12 161/15 163/16
 163/16 163/17 163/18
 163/20 164/7 164/18
they'd [3] 57/18
 75/22 84/24
they'll [2] 54/8 75/25
they're [27] 21/8
 37/17 38/22 38/25
 41/10 58/11 58/12
 60/23 61/7 62/21 63/1
 71/13 76/8 84/10
 101/7 102/10 131/11
 131/11 146/3 151/13
 151/14 151/24 152/3
 152/3 152/9 154/1
 159/21
they've [4] 23/1
 57/24 103/8 135/7
thing [12] 47/11
 58/23 61/7 69/8 77/18
 78/6 90/19 91/1 95/10
 96/7 133/1 151/20
things [51] 22/7
 37/18 51/22 52/5 52/7
 54/3 54/16 54/16 55/2
 55/4 55/19 56/2 56/5
 57/21 57/22 57/23
 58/2 58/11 59/5 59/14
 60/12 60/23 61/1 61/8
 63/24 63/24 64/21
 65/5 65/8 65/9 65/17
 65/20 66/12 67/17
 68/25 69/5 98/8 99/13
 100/23 101/6 101/10
 101/16 102/17 102/22
 103/2 124/17 135/22
 151/14 152/23 155/22
 163/3
think [414]
thinking [7] 27/18
 28/8 81/1 87/18 97/22
 98/1 99/9
thinks [1] 26/1
third [4] 6/8 26/1
 105/17 159/15
this [272]

those [98] 4/19 6/14
 6/16 6/19 7/7 7/9
 10/10 17/20 21/23
 25/6 26/6 30/14 34/15
 34/20 35/16 38/9
 40/24 44/7 55/6 55/19
 68/12 69/5 69/11
 69/13 69/14 74/2 76/5
 85/5 92/7 92/25 94/18
 99/18 104/1 106/1
 107/10 107/18 111/1
 111/4 111/7 111/8
 111/17 111/22 111/25
 113/2 119/10 121/9
 122/14 122/24 123/11
 123/24 124/2 124/17
 126/9 126/17 130/15
 131/12 133/16 134/19
 135/3 138/6 138/22
 139/5 139/16 140/10
 140/18 140/21 142/8
 143/2 145/3 147/7
 147/9 151/13 152/7
 153/16 153/19 153/24
 154/1 154/4 155/9
 156/12 156/19 157/1
 157/3 157/11 158/12
 159/2 159/5 159/14
 159/17 159/20 159/22
 159/24 160/15 162/18
 163/21 163/24 163/24
 164/6
though [12] 13/20
 20/8 26/18 27/6 40/23
 43/23 65/16 90/6 94/4
 95/18 96/19 144/21
thought [27] 17/6
 17/7 23/10 27/17 37/8
 37/10 37/12 37/17
 37/22 37/24 38/4
 40/12 42/4 42/23 43/1
 44/17 48/14 51/23
 55/20 58/16 69/11
 72/3 96/1 98/2 110/16
 122/8 164/12
thousand [1] 70/1
three [10] 11/18 44/8
 81/8 88/8 90/20
 104/22 104/24 130/15
 132/12 159/6
threshold [1] 150/22
through [31] 20/18
 25/2 27/10 27/19
 36/11 46/16 65/15
 71/22 76/1 90/3 107/9
 109/8 109/10 109/15
 110/25 111/17 112/3
 112/22 113/16 113/24
 116/16 123/4 123/22
 125/6 141/21 148/25
 153/8 155/7 160/13
 162/19 162/21
Thursday [1] 99/2
thus [2] 3/5 108/10

tiered [1] 130/15
Tierney [2] 113/25
 116/11
tightly [1] 39/14
time [91] 5/21 9/7
 11/14 11/22 13/16
 16/14 16/23 17/13
 21/1 22/6 23/14 25/8
 27/13 31/14 35/5 35/9
 38/7 38/17 40/23
 44/17 45/4 45/7 47/17
 48/9 50/3 52/2 52/4
 52/7 52/10 53/18 57/9
 59/1 59/10 59/21
 60/25 61/5 61/18
 62/12 62/14 63/6
 63/23 63/25 64/7
 64/16 64/24 65/18
 65/21 66/7 68/5 68/18
 69/8 69/12 70/25
 71/18 72/7 72/19
 73/12 75/1 75/16
 75/21 77/20 78/14
 79/23 84/10 88/2 93/8
 93/19 94/6 96/22
 102/14 103/20 109/13
 109/24 111/21 113/2
 113/16 119/14 124/21
 124/25 127/19 127/24
 128/5 135/9 136/14
 137/13 137/14 139/10
 149/6 150/16 152/12
 160/25
times [3] 3/14 107/9
 161/23
timing [1] 164/14
today [6] 7/19 17/24
 106/4 159/22 159/24
 164/13
Todd [2] 90/16 91/4
toes [2] 161/12
 161/20
together [12] 10/10
 24/10 27/5 30/15
 30/20 31/11 31/17
 33/1 42/18 69/5 70/11
 162/1
told [2] 6/19 7/20
tone [2] 80/15 80/18
too [11] 20/6 28/10
 50/21 66/19 69/9 76/5
 76/15 77/5 109/21
 135/9 162/15
took [18] 1/10 21/4
 30/11 43/13 47/3
 47/15 50/14 59/15
 73/3 106/9 108/5
 109/4 109/11 110/23
 111/23 116/4 145/21
 145/21
tools [1] 157/4
top [8] 26/10 36/13
 37/2 54/5 62/25
 130/10 146/14 163/17

T	tuned [1] 40/20	149/17 152/10 159/10	urgent [1] 23/19	vested [1] 163/21
topic [3] 92/8 92/17 158/8	turn [3] 49/20 120/18 143/14	understands [1] 148/14	urgently [1] 2/25	veto [1] 81/13
topics [2] 86/20 86/21	turning [1] 121/13	understood [9] 28/22 40/11 45/2 45/7 84/4 126/3 128/13 141/4 148/24	us [16] 5/19 21/16 28/4 29/10 32/23 50/8 53/10 56/14 80/15 90/3 96/15 96/15 130/13 135/2 135/5 152/7	via [2] 137/2 162/9
totality [1] 18/22	two [32] 8/7 18/7 22/1 24/6 41/10 52/1 55/19 64/13 65/5 66/12 77/10 77/10 77/16 77/17 79/10 80/2 80/6 80/14 85/3 85/10 86/20 100/8 100/25 102/17 105/11 106/1 124/17 135/22 139/22 139/22 147/23 155/9	undertake [1] 160/3	use [11] 58/25 63/18 81/3 81/25 87/3 101/5 135/23 136/7 152/8 154/3 154/6	video [1] 157/2
touch [3] 40/9 47/6 106/2	two days [1] 100/8	undertaking [2] 41/23 161/1	used [10] 75/16 81/17 81/20 96/5 96/22 122/22 137/10 143/13 151/16 161/14	view [27] 14/16 39/18 61/2 61/12 72/16 75/20 77/9 83/14 88/1 91/8 110/7 110/23 110/24 123/24 133/6 133/10 133/12 133/14 133/16 133/21 134/1 134/24 140/17 144/5 153/19 156/16 159/1
touched [1] 61/3	two weeks [3] 79/10 80/2 80/6	unfortunately [3] 59/12 62/24 67/9	users [1] 153/23	viewpoints [2] 61/20 64/14
towards [8] 16/15 27/3 108/23 110/1 111/5 111/23 142/20 153/25	two-week [1] 80/14	unified [1] 156/3	using [3] 34/15 35/6 95/18	views [12] 24/14 61/16 62/9 62/10 62/21 63/20 63/21 68/24 77/12 84/24 91/5 91/18
tracing [1] 61/1	twofold [2] 70/18 94/7	Unionist [6] 63/15 77/9 77/10 82/13 82/15 82/19	usual [1] 11/3	virtual [1] 120/19
train [1] 135/17	type [2] 54/14 158/3	Unionist/Nationalist [1] 77/9	utility [1] 20/4	virus [2] 59/13 62/23
trained [4] 19/8 21/20 23/1 32/10	types [1] 122/24	Unionists [1] 76/22	V	volatility [1] 110/3
training [6] 106/13 116/18 120/16 120/19 123/21 131/8		United [2] 73/18 97/8	valid [1] 163/22	volunteer [3] 18/14 22/2 22/18
transcript [1] 7/16		United Kingdom [2] 73/18 97/8	values [1] 37/6	volunteering [1] 22/1
transferred [2] 12/25 13/7	U	universal [1] 157/20	varied [1] 106/12	volunteers [3] 21/23 22/15 22/23
transformation [1] 108/24	UK [6] 16/9 19/15 23/20 65/21 106/21 117/24	unless [2] 79/12 99/15	various [6] 48/18 80/24 96/11 96/12 141/18 141/23	vote [5] 80/13 81/3 81/25 82/15 82/25
transition [2] 27/2 124/13	UK Inquiry's [1] 117/24	unrealistic [1] 62/19	variously [1] 140/10	vulnerabilities [2] 96/2 154/8
translated [1] 140/25	UKG [1] 122/1	unreality [1] 17/8	vast [3] 47/9 94/10 144/10	vulnerability [6] 94/12 95/8 154/5 162/6 163/9 163/12
translation [1] 124/6	Ukraine [1] 122/3	until [14] 6/22 13/10 28/3 41/12 41/18 48/9 109/4 109/15 116/22 126/6 134/25 158/13 159/23 164/20	vehicles [2] 123/20 152/13	vulnerable [5] 45/25 94/7 94/10 96/24 111/2
transmission [6] 67/8 67/23 68/16 70/19 97/23 109/17	ultimate [1] 88/16	unwieldy [1] 47/10	version [1] 107/20	
transparency [3] 134/14 155/9 160/11	ultimately [5] 79/3 80/12 91/5 93/7 149/2	up [72] 1/22 5/22 9/16 15/10 20/12 23/23 25/1 25/6 25/7 26/23 27/25 28/1 28/3 28/6 28/9 28/10 28/12 28/15 29/25 30/11 33/24 34/18 35/1 37/7 38/9 40/7 41/17 41/20 41/23 41/24 42/5 43/2 49/11 51/8 67/14 67/16 67/24 70/19 71/10 72/21 74/18 76/2 78/3 85/19 86/10 91/19 91/22 96/20 96/21 99/15 102/13 106/9 108/5 109/4 109/17 110/2 110/23 111/9 116/4 116/22 119/15 119/24 121/17 127/24 128/9 136/21 136/22 138/12 143/20 145/21 151/19 152/4	version [5] 24/7 129/13 129/23 131/16 132/3	W
transparent [3] 35/23 134/16 158/22	unaltered [2] 100/7 100/7	update [2] 4/7 48/19	versus [1] 144/6	wait [1] 8/1
transpired [1] 68/15	unanswered [1] 158/12	upfront [1] 163/4	very [78] 1/19 6/20 7/14 7/20 7/23 10/25 18/18 19/17 31/15 32/9 32/16 33/2 35/23 36/5 37/2 39/14 41/10 41/10 42/6 42/21 46/5 50/25 52/6 59/22 61/20 63/22 67/17 67/17 67/20 68/13 69/20 72/11 72/16 72/17 72/20 74/19 74/21 75/7 81/21 84/6 85/11 87/17 88/6 88/6 89/5 90/8 90/9 103/19 103/20 103/25 104/2 104/6 109/13 110/2 110/24 110/25 111/5 122/18 123/2 136/6 142/14 142/16 142/17 148/21 150/15 150/25 151/14 151/25 154/17 157/25 159/20 161/10 162/11 163/22 164/4 164/5 164/8 164/14	waiting [1] 104/13
travel [1] 155/6	unaware [1] 159/22	upload [1] 153/24		Wales [3] 107/11 161/15 161/20
tread [1] 161/12	uncertainty [1] 110/6	uploaded [1] 4/6		want [30] 12/3 13/20 20/7 20/10 22/4 22/24 23/22 40/2 41/6 42/13 42/15 43/15 50/2 65/25 67/3 76/15 76/20 76/23 77/4 86/20 89/11 89/16 91/17 92/8 94/22 98/16 103/10 113/17 117/3 143/8
treated [1] 134/10	unclear [1] 85/9	upon [3] 44/20 45/9 47/6		wanted [21] 9/12 24/15 25/6 31/13 49/5 50/13 51/6 52/12 55/1 55/20 58/5 63/13 64/5 76/12 87/12 98/8 108/3 117/5 134/5 136/7 146/4
treating [1] 150/17	under [11] 33/19 36/4 36/6 36/11 107/18 118/23 142/6 145/18 151/5 153/9 153/10	urgency [7] 20/16 26/19 60/4 60/5 70/24 71/6 74/12		wanting [3] 27/16 27/23 65/6
trespasses [1] 144/18	underneath [1] 117/9			wants [1] 126/24
trim [1] 146/13	understand [27] 11/9 15/17 20/15 22/24 27/6 29/11 33/6 35/4 35/7 50/4 60/17 64/6 82/21 83/2 86/13 89/20 91/7 114/11 126/5 126/17 126/22 133/22 136/15 139/3 140/5 143/21 148/10			
trimmed [2] 147/1 152/8	understanding [20] 5/5 10/8 11/17 23/14 47/13 48/1 51/1 64/8 132/24 134/21 142/1 142/2 142/5 143/7 145/5 145/7 145/25			
trims [1] 154/20				
true [7] 8/16 9/4 43/3 44/1 105/8 105/14 105/22				
truly [1] 43/13				
try [9] 20/7 30/7 46/4 89/13 94/3 112/22 124/20 136/12 150/5				
trying [17] 18/25 35/4 47/22 53/21 80/21 80/23 93/23 102/7 102/12 102/13 102/22 111/17 112/12 112/13 133/22 157/9 160/9				
Tuesday [5] 29/24 99/12 159/24 164/15 164/21				

W	welcome [1] 155/5	23/6 23/15 26/9 29/9	91/1 94/5 100/22	7/21 14/1 14/4 16/8
war [1] 122/3	well [92] 1/8 13/17	30/11 32/16 34/3	104/25 105/3 107/22	20/10 23/3 24/6 24/9
warnings [1] 66/15	14/20 14/23 15/13	38/21 41/16 41/19	110/9 112/6 116/18	25/17 25/18 28/17
was [518]	16/23 19/20 23/19	42/5 43/7 45/15 52/5	121/8 122/21 123/16	28/24 30/18 33/22
wasn't [50] 11/6	29/9 35/12 36/16 39/5	58/11 59/6 59/16	125/18 130/18 130/21	36/14 38/11 39/19
17/25 18/3 18/5 19/4	40/18 44/25 45/1	59/17 59/18 60/3	131/2 131/8 133/2	39/20 39/20 39/21
23/13 23/14 23/19	45/16 47/24 51/10	60/18 60/18 61/13	134/9 134/17 135/24	41/7 50/24 56/21 58/9
25/1 34/7 40/6 43/22	54/3 62/5 63/17 65/9	62/15 64/23 65/3	137/10 138/23 140/24	60/17 77/13 87/7
45/3 54/22 58/3 68/15	68/22 70/21 73/3	65/16 65/17 71/24	142/5 142/9 142/16	87/25 89/14 90/16
68/23 77/4 77/15	74/13 74/22 76/9 77/3	79/11 81/20 83/25	143/6 143/14 143/16	93/10 96/9 113/19
77/17 79/2 83/17	78/3 78/19 79/19 82/4	84/19 85/19 88/8	144/2 144/9 145/20	114/5 116/17 139/14
84/21 85/3 86/1 91/25	83/12 85/5 85/13 86/7	96/21 97/3 97/21	147/2 147/4 148/25	155/13 157/23 158/24
92/3 93/15 96/22	86/23 88/13 91/11	102/4 108/5 109/14	149/3 151/5 153/23	160/5 160/6 161/2
103/15 107/22 107/23	92/5 95/25 103/14	109/24 110/23 113/23	155/4 156/16 156/23	161/6
108/4 109/7 110/18	104/6 105/23 106/12	115/12 124/10 124/13	157/11 157/16 157/17	willingness [1] 90/10
110/21 120/10 128/2	106/19 106/25 107/20	124/23 125/18 127/22	157/22 158/1 159/9	winter [1] 71/22
128/14 130/19 130/19	110/9 111/8 114/13	127/24 128/2 136/16	159/10 159/12 160/6	wiped [13] 125/20
134/16 134/24 135/12	114/14 114/21 115/15	138/4 138/8 138/9	162/9	126/19 128/14 129/15
136/15 138/9 141/12	117/12 119/5 119/10	139/4 139/8 141/8	whilst [5] 83/11 84/2	137/25 138/7 138/17
142/12 144/21 158/13	119/13 119/14 120/5	145/15 145/21 151/17	107/12 156/12 162/13	138/22 140/11 140/12
wave [2] 66/15 66/22	120/7 120/10 120/20	153/2 159/7 159/15	Whitehall [2] 107/12	141/10 144/23 145/23
way [31] 21/2 29/6	128/7 131/5 134/18	159/18 160/23 160/23	107/24	wiping [2] 128/23
33/20 39/22 45/21	135/11 138/23 140/22	161/25 162/19 162/24	who [54] 2/11 13/4	158/17
46/12 48/1 62/13	145/22 146/3 146/5	whenever [7] 20/13	21/23 22/15 24/2 24/3	wise [1] 112/10
68/25 69/9 77/6 77/7	146/9 147/20 149/5	46/24 49/11 50/15	24/15 25/25 27/22	wish [4] 7/22 26/7
77/19 79/15 82/2 82/4	151/20 151/20 152/3	107/7 146/12 152/8	27/22 29/16 29/17	63/15 69/9
84/5 84/13 88/4 93/19	152/4 152/24 153/18	where [35] 5/13 6/12	32/10 42/3 52/10 54/7	withdrew [2] 104/5
95/1 95/5 102/7	154/7 155/24 156/1	6/12 14/16 31/13	54/17 58/20 62/17	164/10
110/24 111/17 112/6	157/22 159/9 160/13	31/20 34/6 38/6 38/10	69/11 69/11 69/13	within [65] 2/10 3/6
121/22 127/17 136/22	161/5 161/6 161/9	39/13 47/13 48/6	71/16 72/15 76/12	10/6 13/11 25/1 25/7
141/5 149/16	164/11	50/15 51/13 52/8 53/7	76/13 76/22 77/4	37/25 38/2 38/15 39/4
ways [4] 56/11 61/8	well-being [3] 36/16	65/22 69/17 69/21	80/20 85/6 86/23	43/12 43/16 47/25
92/5 112/21	44/25 45/16	79/8 82/21 89/17	95/22 95/22 96/3 96/5	52/25 70/20 82/22
we [303]	wellbeing [1] 36/18	89/18 89/19 90/20	97/13 107/14 118/11	89/14 91/8 92/22
We haven't [1] 152/6	went [12] 22/11	96/17 98/24 100/15	122/6 122/14 125/11	92/24 93/21 95/4
we'd [2] 20/18 74/14	32/17 48/10 54/16	110/4 112/24 135/1	128/22 129/4 130/4	95/21 110/3 111/6
we'll [8] 6/14 9/8 13/9	63/6 77/6 78/8 80/12	153/25 154/24 156/18	130/10 130/13 131/9	114/16 116/2 118/8
30/6 83/1 84/18	89/12 100/6 112/5	163/8	132/12 132/16 132/18	118/8 118/19 119/3
125/23 128/4	158/12	whereas [2] 63/14	134/20 139/16 158/1	122/22 123/24 124/2
we're [22] 22/21	were [241]	164/12	163/13	126/3 131/2 131/11
47/16 54/19 67/6 67/6	weren't [13] 6/19	whereby [2] 68/8	whole [3] 32/23 47/1	136/12 138/21 138/23
67/8 93/23 95/6 95/6	6/22 28/3 35/8 57/3	73/23	80/19	138/23 138/24 139/17
101/25 102/2 108/25	85/6 87/14 88/9	whether [31] 7/22	whole-system [1]	140/3 140/24 141/7
134/3 134/11 151/5	114/10 133/23 139/7	35/4 35/5 37/21 37/23	32/23	142/19 144/1 144/5
155/4 155/5 157/9	139/15 141/14	38/19 45/2 56/17	wholesale [1] 144/23	145/1 146/17 147/10
157/12 160/9 162/16	Westminster [1] 12/9	63/10 64/7 77/25	whom [2] 93/1 94/19	147/17 148/16 152/17
162/21	what [195]	78/17 78/19 79/9	whose [1] 130/14	153/22 154/8 154/24
we've [15] 18/11 22/1	what's [16] 18/17	80/13 86/6 87/9 89/7	why [30] 3/15 22/2	156/13 156/25 157/24
24/3 30/17 30/18 50/9	55/22 69/8 72/7 72/22	90/9 90/10 90/11	27/19 39/23 58/16	159/2 159/25 162/13
53/25 81/4 100/25	77/18 89/24 96/14	124/13 128/11 131/23	64/8 72/12 75/11	164/3
102/18 103/4 111/13	96/15 99/24 100/24	131/24 138/18 143/25	75/20 75/21 76/16	without [8] 43/7 71/4
114/11 114/23 151/23	102/22 103/5 137/6	144/19 144/24 153/15	79/12 100/5 100/6	84/8 87/5 113/15
wedded [1] 72/15	144/19 144/21	159/1	101/17 102/23 118/14	144/23 145/23 163/25
week [10] 75/3 78/22	whatever [6] 34/11	which [91] 1/10 1/16	132/24 132/25 133/22	witness [14] 1/5 7/25
79/3 79/11 79/22	35/1 102/13 103/1	1/17 2/20 3/4 3/12	133/22 134/21 140/16	8/8 13/23 32/2 104/5
79/24 80/14 100/10	143/8 143/12	3/19 4/17 5/14 5/16	159/7 159/13 159/14	104/16 104/23 109/20
116/7 123/19	WhatsApp [4] 122/23	6/21 15/5 17/11 17/12	159/16 159/18 160/7	114/23 132/11 135/25
weekend [2] 99/12	151/7 151/24 153/15	18/6 20/4 24/11 27/2	162/12	136/21 164/10
164/17	WhatsApps [7]	28/11 34/1 41/4 41/13	Widdis [4] 51/9 53/25	witnesses [2] 7/19
weekly [1] 53/7	135/24 138/18 148/20	41/15 44/10 44/20	54/4 98/17	85/5
weeks [8] 21/22	151/17 152/14 153/4	45/10 48/13 48/15	Widdis' [1] 102/7	won [2] 89/22 90/8
75/19 79/10 79/25	163/2	53/1 55/25 56/2 61/9	wider [3] 16/10 71/24	won't [6] 38/11 66/1
80/2 80/4 80/5 80/6	when [77] 1/7 1/8	61/22 67/20 69/18	159/2	66/1 92/13 99/15
	11/8 12/24 17/18 22/6	70/2 77/21 85/4 86/11	will [46] 2/2 6/9 7/19	140/22

W	Y			
<p>wonder [6] 1/6 1/22 9/15 15/10 15/15 26/8</p> <p>wondered [1] 69/16</p> <p>word [3] 58/25 63/19 101/5</p> <p>wording [1] 23/15</p> <p>words [9] 1/12 10/18 21/11 64/9 97/21 99/18 109/15 123/2 123/12</p> <p>work [31] 11/14 13/4 13/8 13/14 13/19 14/4 14/7 16/20 18/11 22/9 22/19 22/23 22/25 24/7 26/14 26/16 27/4 28/18 33/1 48/19 89/24 90/21 90/21 95/11 99/9 100/24 101/12 144/7 157/9 162/1 164/4</p> <p>worked [3] 16/24 110/9 131/7</p> <p>workers [2] 65/4 97/13</p> <p>working [14] 13/6 34/5 55/22 56/17 65/23 71/13 86/12 88/9 100/25 101/10 102/22 103/5 112/22 162/21</p> <p>works [2] 101/21 163/10</p> <p>workstream [2] 93/21 95/4</p> <p>world [1] 110/3</p> <p>worldwide [1] 54/7</p> <p>worried [2] 58/16 69/13</p> <p>worry [1] 74/10</p> <p>worsening [1] 71/11</p> <p>worst [4] 34/9 34/14 34/18 36/9</p> <p>worst-case [3] 34/9 34/14 34/18</p> <p>would [191]</p> <p>wouldn't [17] 21/14 21/14 25/19 31/15 35/16 39/12 42/13 42/15 42/15 63/18 63/18 77/9 94/22 97/11 97/17 101/5 148/2</p> <p>writing [3] 35/13 99/13 102/5</p> <p>written [3] 15/6 34/23 64/24</p> <p>wrong [11] 7/5 28/19 54/4 54/9 54/16 76/21 78/12 81/5 91/1 91/17 98/7</p> <p>wrote [5] 3/2 43/20 101/17 113/25 120/22</p>	<p>yeah [20] 26/17 70/4 74/6 76/10 78/11 79/7 79/14 80/7 85/13 87/6 91/20 114/17 130/2 137/12 137/19 138/25 141/11 148/12 153/19 162/6</p> <p>year [8] 26/15 26/18 26/25 27/1 27/3 116/23 126/7 154/18</p> <p>years [1] 156/21</p> <p>Yellowhammer [19] 16/21 17/3 17/20 17/24 18/8 18/10 18/13 18/15 19/9 19/21 20/4 20/19 21/1 21/16 21/19 22/18 24/7 32/22 32/24</p> <p>yep [3] 51/4 68/11 83/19</p> <p>yes [345]</p> <p>yesterday [9] 14/13 20/20 22/19 49/18 61/4 85/20 93/18 93/20 94/25</p> <p>yet [3] 56/13 81/4 116/15</p> <p>you [448]</p> <p>you know [2] 73/25 164/1</p> <p>you'd [3] 38/10 59/25 82/24</p> <p>you'll [4] 6/4 25/4 63/19 106/1</p> <p>you're [43] 10/24 15/13 20/25 23/16 29/25 30/22 31/4 31/23 35/8 36/19 40/3 40/19 40/20 44/6 47/19 50/24 50/25 61/13 61/14 61/15 71/8 76/17 79/20 83/2 84/4 86/14 95/25 101/22 104/3 106/6 106/12 114/25 117/3 118/23 118/24 125/17 132/11 139/16 143/21 143/22 143/24 149/2 164/16</p> <p>you've [35] 7/18 7/20 8/1 15/4 33/6 37/19 40/1 49/7 50/10 56/20 60/7 64/21 75/6 77/10 77/11 77/19 79/10 84/12 84/15 89/17 89/18 92/18 93/4 98/19 104/22 104/23 107/25 109/19 114/13 117/4 117/15 135/15 151/7 154/9 160/19</p> <p>young [1] 67/24</p> <p>your [103] 4/20 7/17</p>	<p>8/4 8/10 8/17 9/4 11/20 12/2 12/4 12/4 12/6 12/14 13/23 14/25 15/4 15/14 20/23 21/19 23/14 26/16 26/18 28/5 30/1 30/11 30/24 31/20 32/2 32/4 32/9 33/9 33/19 39/5 40/2 41/16 44/4 49/7 49/11 49/13 55/1 55/7 55/13 61/13 61/15 61/16 61/16 66/13 68/5 68/7 70/23 74/24 75/6 79/10 84/12 84/15 87/22 87/23 88/4 90/2 92/18 93/4 93/14 95/12 99/13 99/14 99/18 100/5 100/11 100/12 100/22 102/5 103/14 103/17 103/20 104/2 104/19 105/8 105/15 105/22 106/6 106/17 107/4 107/5 108/10 109/4 109/20 117/5 118/3 120/17 120/24 121/14 131/19 132/24 136/21 137/2 137/6 145/9 146/17 149/6 152/9 152/9 161/2 161/5 161/17</p> <p>yourself [4] 15/20 33/14 98/17 98/21</p>		