

Witness Name:

Statement No:

Exhibits:

Date:

UK COVID-19 INQUIRY

WITNESS STATEMENT OF MARIA HANNON

I, Maria Hannon, will say as follows: -

1. I confirm that I have written this statement, the facts stated are all known to me, or believed by me to be true and the opinions stated, and inferences drawn are mine and mine alone.

My role and responsibilities in the Executive Office (TEO)

2. I am currently Grade 7, Head of Covid Strategy, Recovery and Inquiry Branch, I took on this role in April 2022 under temporary promotion opportunity. In December 2020, I joined the Covid Strategy and Recovery Branch, as Deputy Principal, my job at that time was to provide advice and guidance on the government's response to the pandemic. My job role and responsibilities have evolved and expanded during the time period in question. This included the development and implementation of the Pathway out of Restrictions and Covid Recovery Plan. I am now responsible for identifying and leading the actions required to prepare for the provision of records, information or data to the inquiry and supporting TEO witnesses through the Inquiry process. **[Exhibit: MHA/01 – INQ000470947]**

3. As Grade 7 Head of Covid Strategy and Recovery Branch, I report directly to Jane Holmes and all staff in the Branch report to me through their line managers. The Staff Officer who led on Secretariat work was a Graduate Entrant Staff Officer and reported directly to me. Jane Holmes was the countersigning officer for this Staff Officer. Hannah Murphy is another Staff Officer within my Branch and reports to a Deputy

Principal who reports to me. On the 11 May 2023 she covered the Secretariat role for the Graduate Entrant Staff Officer who was unavailable.

4. Dr Jane Holmes has remained as my line manager since December 2020. I have management responsibility for Covid Strategy, Recovery and Inquiry Branch, 4 Deputy Principals, 3 Staff Officers, 2 Executive Officers and 2 Administrative Officers.
5. Karen Pearson, Director of Covid-19 Strategy and Recovery, Civil Contingencies, and Programme for Government in TEO is Jane Holmes' line manager.

NICS Covid-19 Inquiry Oversight and Assurance Framework

6. The NICS Covid-19 Inquiry Compliance and Assurance Group forms part of the NICS Covid-19 Inquiry Oversight and Assurance Framework **[Exhibit MHA/3 - INQ000409593]** that was established in June 2022. This framework included the establishment of three groups:
 - a. HOCS Reference Group **[Exhibit MHA/4 - INQ000409594]** chaired by Jayne Brady, the Head of the Covil Service (HOCS),
 - b. an NICS Public Inquiry Compliance and Assurance Group **[Exhibit MHA/5 - INQ000409595]** chaired by Karen Pearson, and a
 - c. NICS Preparedness and Coordination Group **[Exhibit MHA/6 - INQ000409596]** chaired by Jane Holmes
7. TEO also has a TEO-specific Inquiry Preparedness Group **[Exhibit MHA/7 - INQ000409597]** that is also chaired by Jane Holmes and that business areas within TEO attend.
8. My team provide Secretariat support to the groups listed above. In May 2023, Secretariat to the groups was provided by Graduate Entrant Staff Officer who reported directly to me. I approved papers for issue, this included, draft minutes, agendas and Action points.
9. The Terms of Reference for the Compliance and Assurance Group **[Exhibit MHA/05 - INQ000409595]** state that:

The COVID-19 Public Inquiry– NICS Compliance and Assurance Group has been set up to monitor and report on Compliance the NICS preparedness and response to the UK Covid Inquiry.

The purpose and responsibilities of this Group may change in response to the Inquiry's requirements. The TOR and associated governance documents will be reviewed and updated as appropriate.

10. I have been a member of the Compliance and Assurance Group from June 2022. It is also my responsibility to ensure that the Group is supported by administrative staff.

Compliance and Assurance Group Meeting 11 May 2023

11. The members of the Covid Inquiry Compliance and Assurance Group at that time (May 2023) were:
- Karen Pearson, TEO (not present at 11 May 2023 meeting)
 - Jane Holmes, TEO
 - Jayne Byrne, TEO (not present at 11 May 2023 meeting)
 - Chris McNabb, TEO
 - Head of Covid Strategy Branch TEO
 - Emer Morelli, Department of Finance (DoF)
 - Name Redacted (DoF)
 - DSO Solicitor
- In addition, meetings of the Covid Inquiry Compliance and Assurance Group were routinely attended by a Staff Officer of the Covid Strategy, Recovery and Inquiry Division, TEO as Secretariat to the group.
12. The Compliance and Assurance Group is normally chaired by Karen Pearson, Director of Covid-19 Strategy and Recovery, Civil Contingencies, and Programme for Government in TEO. Unfortunately, Karen Pearson was absent for a period of 2023. Jane Holmes fulfilled the position of Chair to the group during this period, this would be normal practice within the Department.
13. For the meeting on 11 May 2023, the Staff Officer who normally provides administrative support to the meeting was scheduled to attend a training course that morning through the internal NICS training provider. As this training conflicted with the scheduled time of the meeting I asked a staff member (Hannah Murphy) to attend the meeting to provide Secretariat Support. I am not Hannah Murphy's direct line manager; she is managed by a DP whom I line manage.
14. I have worked closely with Hannah since February 2021, when Hannah joined TEO Covid Team. I am aware from various meetings that Hannah has provided administrative support and that she would type the draft meeting note up in real time and would not normally record any handwritten notes.

15. During the period in question, I was involved with completing the TEO disclosure for Module 1 and assisting in preparing the then Permanent Secretary Denis McMahon for Module 1 hearing.
16. The 11 May 2023 meeting was held on TEAMs platform and attended by:
- Jane Holmes
 - Emer Morelli (Department of Finance)
 - Name Redacted (Department of Finance)
 - Chris McNabb (TEO)
 - Senior Principal Legal Officer (DSO)
 - Myself, and
 - Administrative support was provided by Hannah Murphy.
17. My recollection of the 11 May 2023 is that the meeting was slightly delayed in starting. During the meeting, I advised the group that there was potential loss of data from a ministerial phone within the department and that we were still trying to establish the position, but more than one device may have been affected. This was a verbal update only, there were no papers relevant to the issue at that time. This was an emerging issue that I knew I would have to discuss with more senior colleagues. The third revision of the draft note of meeting **[MHA/8 – INQ000452594]** that was saved at 10:32 on 11 May 2023. That revision recorded:
- “noted that WhatsApp messages from Former Ministers phones has been wiped as the phones have been returned to a factory rest position. Maria is discussing this issue so that we can inform the Inquiry that all reasonable steps have been taken in relation to this information”*
18. I did not review this revision (3rd Revision) prior to the 9 January 2024.
19. At the time of the meeting, this issue was very much beginning to emerge. I emailed both TEO Principal Private Secretaries for First Minister and deputy First Minister on 9 May 2023 to ascertain more details on the position. **[Exhibit MHA/9 - INQ000409608]**
20. My recollection that at the meeting on 11 May there was also discussions in the meeting about Cabinet Office position on disclosure of WhatsApp messages and it was decided that departments should continue to gather the material but not release any strands until the position with the Cabinet Office’s s21 notice was resolved.

21. There was also a discussion around the payment of former Minister's travel costs to attend Inquiries and the need to be mindful of our duty under Managing Public Money Northern Ireland (MPMNI).
22. Following the conclusion of the meeting on 11 May 2023, the Content Manager ("CM") link to the draft minutes was emailed to me, by Hannah Murphy, before 15 May 2023, for my clearance as part of normal practice. I accessed the minutes on 15 May 2023. This was the first time I accessed the document.
23. On the 15 May 2023, I recall that I had a conversation with Jane Holmes in person and in the office in Castle Buildings there was no one else present when the matter of the draft note of 11 May 2023 was discussed. I would not normally seek to speak to my line manager about clearing a draft meeting note and did so on this occasion as I was uncomfortable with the wording "factory reset position" that appeared in the draft minute. I was conscious that I was a junior official reporting on a significant issue to Senior Civil Service. The current draft meeting note of the 11 May meeting at this point is Revision 11 [**Exhibit MHA/13 – INQ000452578**]. That revision stated:

"Noted that WhatsApp messages from Former Ministers phones have been wiped as the phones have been returned to a factory reset position and Maria is discussing this issue."
24. During the conversation with Dr Holmes, on the 15 May 2023, I mentioned that I felt that the wording "factory reset position" was something we could not stand over at that stage for factual accuracy. Jane Holmes supported me on this point and made the decision to amend the text to the more concise wording. The revision of the note occurred during the discussion with Dr Holmes. I suggested wording, and Dr Holmes agreed, and I amended the text to revision 12 of the 11 May 2023 note [**Exhibit MHA/14 – INQ000000000**] which is: "The meeting noted the position of TEO Former Ministers and SpAD phones." I then cleared the draft minutes to issue to the group members for consideration. I cannot recall why the meeting note was amended to include reference to SpADs.
25. I made some track changes to the draft minutes before I returned the document to Hannah and asked her to consider my track changes and if she was content with my suggestions that she would accept the suggested amendments or to speak to me if she had any concerns about my suggestions. No concerns were raised on my suggested changes and Hannah accepted the changes. The draft note was then ready for issue to the group. [**Exhibit MHA/09 - INQ000452560**]

26. The CM Audit and Revision history [**Exhibit MHA/09 - INQ000452562**] shows that the draft minutes were reviewed by the Staff Officer who normally provided administrative support to the Compliance and Assurance group meeting on a number of occasions during the course of week. The Staff Officer raised no concerns regarding the content of the draft meeting note with me. Reviewing the draft minutes from a previous meeting would be normal practice to ensure that he was up to speed on discussions at the meeting and that he could take forward action points. Reviewing the draft note of the meeting would also assist in preparing the agenda for the next meeting. The draft minute was viewed again on 17 May 2023 by that same Staff Officer and the Audit report shows that the document was sent via email at 12:29. At this time the papers of the next meeting of the Compliance and Assurance Committee were issued. [**Exhibit MHA/10 - INQ000470951**]
27. The meeting note document for 11 May 2023 was set up in advance of the meeting by Hannah Murphy. She saved the document into CM on 10 May 2023 ([**Exhibit MHA/11 - INQ00000000** Exhibit Revision 1). I know this from viewing the audit report. Within CM, a revision of a document is created every time someone makes changes to and saves an existing document. ([**Exhibit MHA/12 - INQ00000000** Exhibit NICS HPRM Guidance note 9).
28. There are 13 revisions of the 11 May 2023 meeting note. To the best of my knowledge, no revision of the note of the meeting was shared with anyone between 11 May 2023 and 17 May 2023. This is supported by the Audit Report. However, if the minute is opened as a Word document, I am not aware if it was shared by anyone who opened it.
29. I was not involved in drafting the 11 May 2023 meeting note until making revision 12. It is my recollection that Hannah Murphy emailed me the CM Link to the document shortly after the meeting seeking my clearance of her draft note. Unfortunately, that email has not been retained, but this would not be unusual, as the CM system saves the revisions and accordingly all versions of the draft minute within CM can be reviewed. The Audit Report indicates that I did access the document on 15 May 2023 and made a change to the document. At this stage as part of the process of clearing the draft minutes for issue to the members of the meeting, I recall discussing the draft minutes in person with Jane Holmes in our office.
30. NICS Compliance and Assurance group were not aware of previous versions of the minutes. The group only received the final version of the draft meeting note that issued on 17 May 2023 for approval. It would be normal practice that I do not share

with the group the earlier versions of the minute or would I access previous revisions of documents that would come to me under the clearance of papers process. My practice is when approving draft minutes of issue the group, that I would track changes to the document and invite the note taker to consider my suggestions and to speak to me regarding any of my suggestions that they did not agree with. The note taker would then issue the final agreed draft minute out to the group to the group for consider.

31. Information provided by the TEO Departmental Information Manager states:

“Content Manager is the official repository for all NICS records, including those of TEO. The Content Manager system records details of all instances where a document is accessed or updated. This information is known as the active audit events of a document. The audit events record the event type, the date of the event and the user performing the action.

32. *An active audit event is recorded each time a document is amended. This is known as a document revision on the content manager system. A revision of a document is created every time a user makes changes to and saves an existing document. These revisions can be viewed at any time and if necessary an earlier revision can be promoted to become the main and current document. This feature of content manager is useful when drafting a policy or procedures document as each time the document is edited and saved, a revision is created.”*

33. It is normal practice that notes of any meeting within TEO are not recorded verbatim.
[Exhibit MHA/14 - INQ000470949]

Compliance and Assurance Group Meeting – 18 May 2023

34. The meeting of the Compliance and Assurance Group on 18 May 2023 considered the draft meeting note of 11 May meeting and confirmed that it was content to finalise the note. This is done by the Chair (Jane Holmes in Karen Pearson’s absence on this occasion) asking those present to agree the minutes as an agenda item. The papers for the meeting on 18 May 2023 were issued by email to all members on the 17 May 2023 **[Exhibit MHA/10 - INQ000409609]**. Included in the papers was the draft note of the meeting. No amendments were received by email regarding the draft notes of the meeting note of 11 May 2023. Nor was there any discussion or request during the meeting on 18 May 2023 for the note of 11 May meeting to be amended by the meeting attendees. **[Exhibit MHA/15 - INQ000409610]**.

35. The meeting of 18 May 2023 was attended by Dr Holmes, Emer Morelli (DoF), DSO SPLO and myself. A junior member of the Covid Strategy Recovery and Inquiry Division TEO attended as administrative support to the group.

Assistance in the preparation of Informal Communication Statement

36. Jayne Brady, Head of the Northern Ireland Civil Service, received a Rule 9 Request regarding Informal Communication dated 14 November 2023. My team assisted in the supporting Ms Brady in drafting her response this included researching, finding relevant document and fact checking.
37. On 13 December 2023, I received an email from Principal Legal Officer in DSO, seeking instructions on a number of issues in relation to the drafting of the HOCS Informal Communication Rule 9 request. These included seeking details on how we were first informed that the phones had been reset. I responded to the email on the same day, In that response, I made the following point:

“TEO inquiry team informed at meeting with Private Office Staff May 2023 this was shared with DSO colleagues and later discussed with Permanent Secretary”.

I am exhibiting a redacted version of the response at **Exhibit MHA/XX – INQ000470955** that shows that element above but do not waive the remaining privilege over the rest of the content of the document. The DSO SPLO emailed on 13 and 15 December 2023 requesting further information. Dr Holmes suggested on 15 December 2023 that we should meet to discuss the issues the following week.

38. I recall that there was a discuss on the position of TEO Ministerial phones including the possible data loss for a Ministerial phone with Dr McMahon, who was then Permanent Secretary during early summer 2023. This occurred while Dr McMahon, Dr Holmes and Senior Principal Legal Officer along with me were traveling from Paddington station to London City Airport. Several issues were discussed with Dr McMahon regarding work underway within the Department in responding to Covid Inquiry, this included the position of Ministerial phones and potential loss of data from the repurposing of a former Minister’s mobile phone. All those travelling together including myself were involved in the discussion. The matter on potential data loss was either raised initial by Dr Holmes or myself. A note of this discussion was not taken.
39. I had a recollection of raising the matter of potential data around TEO Ministerial Phone at a meeting around May June 2023. As a result of that recollection, I asked a Staff Officer in my team to trawl through minutes of the various groups that sit within

NICS Covid-19 Inquiry Oversight and Assurance Framework as I felt that the position of the mobile phones within the Department was raised by me and then discussed at a meeting under this Framework. This trawl occurred on or just after the 13 December 2023.

40. Following a trawl of the Content Manager the Staff Officer brought to my attention the meeting note of 11 May 2023. This occurred on 14 December 2023. The Staff Officer extracted the 11 May 2023 note of the meeting on 14 December 2023 to shared drive area as evidenced in the Audit and events record as a potential exhibit to support the Informal Communication Statement. Documents that the department consider for disclosure are extracted from CM to shared Drive to facilitate the uploading of documents to Inquiry's Egress platform. I asked my team to include the note of 11 May 2023, as part of the discovery to support the HOCS draft statement.

Meeting on 9 January 2024

41. I was aware that a meeting had been set up for Tuesday 9 January to discuss the draft Informal Communication statement but was not included on the invite list until the morning of 9 January 2024, when Karen Pearson texted me. I responded to the text message with the time and asked if Ms Pearson wished for me to attend the meeting. She advised me that she wished for me to attend and to get the meeting set up for her to attend virtually. My line manager Jane Holmes was originally not attending the meeting due to a personal commitment which caused her to be out of the office that day.
42. Unfortunately, shortly before the meeting, Karen Pearson needed to attend Accident and Emergency. Due to her attendance at the hospital, she was unable to attend the meeting with Head of Civil Service at 3pm. Jane Holmes made herself available to attend instead. During the meeting, I took some limited handwritten notes, none of my notes relate to the disagreement of the 11 May 2023 meeting note and as such I do not waive privilege in respect of that note.
43. In attendance at the meeting on 9 January 2024 were:
 - Dr Jayne Brady,
 - Jane Holmes
 - Neill Jackson (TEO),
 - Tracey McCavigan (DoF),
 - Louise Crilly (DSO),

- Eugene O'Loan (DSO),
- Senior Principal Legal Officer (DSO)
- Junior Counsel
- King's Counsel

I was also present at the meeting.

44. Junior Counsel to TEO raised points regarding the metadata of the 11 May 2023 meeting note that she had received from DSO PLO. Junior Counsel highlighted that the metadata of the meeting note of 11 May 2023 indicated that the note was created after the meeting and by junior members of my team. It became apparent during the discussions at the meeting on 9 January 2024, that Junior Counsel was reviewing the metadata of a copy of the meeting note that had been extracted from CM on 14 December 2023. This extraction was carried out by a Staff Officer within in my team. I pointed out to Junior Counsel that the document she was basing her points on, was a copy of the original document and therefore did not retain the actual factual position as contained within the CM Audit and Events Report.
45. This does not tally with the Content Manager metadata, which shows the meeting note was initially created on 10 May 2023. It is possibly not a matter that I can comment on, but it may be that an explanation for this is that the metadata for the meeting minute uploaded to the shared drive is a snapshot of when the final version was saved into CM and captures the name of the person who extracted the metadata.
46. There are, therefore, two sets of metadata associated with the 11 May 2023 meeting note – (i) the metadata for the document stored on Content Manager and (ii) the metadata for the document that saved onto the shared drive on 14 December 2023.
47. During the meeting, I accessed CM and was able to review the document and the audit history for the document. I shared my laptop with some of the attendees at the meeting. Jayne Brady then asked Tracey McCavigan to take forward an independent review of the document within Content Manager and provide her with a report.
48. The meeting on 9 January 2024 was the first time that I was made aware that Senior Principal Legal Officer (DSO) did not agree that the discussion round the potential loss of data recorded in the meeting note from the 11 May 2023 had occurred. Senior Principal Legal Officer (DSO) was in attendance at the Compliance and Assurance meeting on 11 May 2023 and at the meeting of the Compliance and Assurance group meeting on 18 May 2023 when the 11 May draft meeting was agreed. No amendments were received from the membership of the Compliance and Assurance Group.

49. I reviewed all revisions of the document on 10 January 2024 following an email exchange with Junior Counsel, who requested sight of all revisions so that she could review the metadata. The 13 revisions of the document from CM were provided to all attendees of 9 January 2024 meeting.
50. Access to the meeting note of 11 May 2023 and its revisions was granted to Ms McCavigan by me on 10 January 2024. This was to enable her to carry out a review of the meeting note, and its revisions as requested by Dr Brady during the meeting on 9 January 2024 [Exhibit MHA/ – INQ000470950].
51. Ms McCavigan provided a report on 24 January 2024 [Exhibit MHA/ - INQ000409611] and this report has been shared with the Inquiry.

My Awareness of the Disagreement Regarding the 11 May 2023 Note

52. It was only during the meeting of 9 January 2024, that I was made aware that the contents of the 11 May 2023 meeting were being contested by one member of the Compliance and Assurance group namely the Senior Principal Legal Officer (DSO). As I previously stated, no attendees of the 11 May 2023 meeting had raised any issue with the copy of minutes provided or suggested any amendments or corrections to the minutes.

Statement of Truth

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

Signed: Personal Data

Date: 15 April 2024