

Witness Name:

Statement No:

Exhibits:

Dated:

UK COVID-19 INQUIRY

WITNESS STATEMENT OF ANTHONY HARBINSON

I, **ANTHONY HARBINSON**, will say as follows: -

1. I began my career in September 1985 when I joined the Northern Ireland Electricity Service's Graduate Management Scheme, where I trained to be a Chartered Certified Accountant. In March 1988 I joined the NI Health Service and held several senior roles in the Acute, Secondary and Primary Care fields, including the Director of Finance, Estates and Human Resources for the NI Ambulance Service and the Director of Finance and Planning for the Mater Infirmorum Hospital HSS Trust.
2. I joined the Northern Ireland Civil Service (NICS) in December 2002 when I was recruited to lead the Programme to create the NI Public Prosecution Service as a Senior Assistant Director of Public Prosecutions responsible for resources. In April of 2007 I moved to become the Director of Resources for the Northern Ireland Office (NIO) and in April 2010 when policing and justice powers were transferred to the NI Executive and Assembly, I became the Director of Justice Delivery for the newly formed NI Department of Justice (DoJ). In May of 2013 I became the Director of Safer Communities and in September 2019 I took up the dual role of Director of Access to Justice and Chief Executive of the NI Courts and Tribunal Service. Whilst serving in this role I took a temporary secondment from the DoJ to The Executive Office (TEO), when, from 18 March 2020 until 31 July 2020, I took up the role of Chief of Staff for the NI Civil Contingencies Hub (NI HUB) during the first wave of Covid-19.

3. I cannot comment on any issues that occurred either before 18 March 2020 or after 31 July 2020 as I had no direct involvement in the work of the NI Hub outside of the period I acted as Chief of Staff.
4. In July 2021 I left the DoJ to take up the role as Permanent Secretary of the NI Department of Agriculture, Environment and Rural Affairs (DAERA) and in July 2022 I retired from the NICS. As Permanent Secretary, I was the senior advisor to the Minister and a senior advisor to the NI Executive via the NICS Management Board, which is made up of the Head of the NI Civil Service and nine Permanent Secretaries. I was responsible for the development and delivery of all policies and operations within the Department and for leading its 3500 workforce and the effective and efficient spending of its £550m Budget. I reported directly to the Minister and Head of the Civil Service and, as Accounting Officer, I was responsible to the NI Assembly for the sound management of risk and public funds.
5. The background to how I became Chief of Staff for the NI Hub is as follows: early on the morning of 17 March 2020, a Bank Holiday in Northern Ireland, I received a call from Peter May, Permanent Secretary of the Northern Ireland Department of Justice, who asked if I would be willing to take a temporary secondment to TEO to help the NI Hub deal with the looming Covid 19 pandemic. I said that I would be willing to help in any way I could. I was told that David Sterling, the Head of the Civil Service (HOCS), would ring me later that morning to give me more details about the role I would take on and the duties that would be involved.
6. HOCS rang me an hour or so later and thanked me for my willingness to take on the secondment. He explained that the secondment would be as Chief of Staff for the NI Hub, given that Chris Stewart, Director of Executive Support and Programme for Government, the Grade 3 who would normally be expected to fulfil the role, would, for medical reasons, be required to start shielding quite soon. It was agreed that I would come into Castle Buildings the following day to have a handover with Chris who would outline the major issues and operational requirements of the role.
7. I am not sure of the specific reasons I was asked to take on the role of Chief of Staff by HOCS, but I assumed it was because of the some of the following points:
 - a. I had 15 years' experience working in the NI Health Service, including project managing the creation of the NI Ambulance Service.

- b. I had 10 years' experience as a Board member of the NI Health Promotion Agency, the forerunner to the Public Health Agency.
 - c. I led the programme to create the Eastern Multifund, a very large General Practice GP Fundholding Platform, the largest of its kind in the UK at that stage, covering 50 practices and almost 200 GP's. I worked as the Multifund's Deputy Chief Executive for almost 6 years and had extensive experience in the field of primary care.
 - d. I project managed the creation of the NI Public Prosecution Service and had worked as a Senior Assistant Director of Public Prosecutions for over 5 years.
 - e. As the Director of Resources for the NIO I had played a key role in the transfer of responsibilities from the old NIO to the new DoJ when policing and justice powers transferred to the NI Executive in April 2010.
 - f. I was one of the longest serving Deputy Secretary's within the NICS, having been at that grade for almost 15 years at that point.
 - g. Having spent 9 years in the NIO, I had a good knowledge of how Whitehall and the UK Government functioned and good networks within several UKG Departments as well as very strong networks across all NICS Departments.
 - h. As Director of Safer communities for over 6 years, I had considerable experience of working with police and the justice system. I had managed the justice Civil Contingencies issues associated with public protection, including overseeing the DoJ's emergency control room which was operated during contentious marches and at times of widespread public disorder.
8. I took up the Chief of Staff role the following day, 18 March 2020. I met with HOCS and Chris Stewart in the NI Hub in Castle Buildings and they explained the background to the NI Hub saying that it was created as part of Operation Yellow Hammer, to deal with any issues or problems arising from a non-negotiated exit from the European Union. Whilst I was aware of Operation Yellowhammer, I personally had had no role within the exercises, so this was completely new territory for me. The Yellowhammer planning exercises had determined the Grade, numbers and skills of staff required to run the Command, Co-ordination, and Control (C3) structures, including the NI Hub (**Exhibit AH/1 – INQ000389178**). Before the exercises began a call for volunteers went out across the NICS and key stakeholders. I believe that there were approximately 190 individuals from the large number of those who applied who were selected and appointed to work within the C3 structures, all of whom were then trained in the operation of the NI Hub or its associated support structures, such as the Departmental Operational Centres (DOCs). I understand

that volunteers were used to staff these structures rather than having permanent staff in post, as no one was sure when or if they would be required. The decision was made to cover all the roles, including Chief of Staff, with volunteers who would be released from their permanent roles should the situation require the standing up of the C3 arrangements.

9. I have no insight as to why the NI Hub was not stood up prior to 18 March 2020, given that the DOCs had been activated the week before I took up my new role and the Health DOC had been running for a number of weeks before that, and as this predates my secondment to the role from my home Department and I was not privy to any such discussions; however, I would imagine that it was simply that Covid-19 was initially being treated as a health issue and its rapid escalation into a global pandemic that would require a whole of government and whole of society approach was not immediately apparent. The role of NI Hub was to act as the co-ordinating function within the C3 structures (**Exhibit AH/2 - INQ000371641**). As Chief of Staff, I would be responsible for the operation of the NI Hub and its interactions with the other parts of the C3 Structures, but I did not have any leadership or management control of those other structures. The main tasks of the NI Hub would be to assist in the provision of secretariat functions and the collation of information for the NI Civil Contingencies Group (CCG) to help that body and the NI Executive in their decision making during a time of crisis. The TEO Module 2c Corporate Statement refers to the Strategic: TEO's Role in Civil Emergencies.

10. It is important to restate at the outset that the NI Hub did not have any decision-making powers. Its role was simply to collate and share information from across all Departments and key stakeholders, such as the emergency services, Local Government, the Ministry of Defence, etc, and to provide that information to CCG members to help them identify significant cross cutting challenges so they could be escalated to the Executive for discussion and decision making. The doctrine for the C3 structure, including the way in which the NI Hub operates is set out in the NI Concept of Operations (CONOPS) documentation (**Exhibit AH/3 - INQ000371640**) and this was shared with me by Chris Stewart.

11. However, as pointed out in the 'C3 Covid-19 Response Lessons Learnt Review and Future Roadmap', June 2020 (**Exhibit AH/4 - INQ00023223**) and from the lessons which could be gleaned to the point of my departure when Andy Cole assumed the role, this was the first time that the NI C3 structures had been activated in response to a live event and the pace and scale of the disruption caused by Covid-19 was truly unprecedented. To the best of my knowledge all the test scenarios played out during the Yellowhammer exercises

were worked through in laboratory type conditions with expected outcomes mapped out and any deviation from the expected results noted and dealt with later. The various scenarios were also run with full complements of trained staff, each of whom had been assigned and trained for specific roles. In other words, they were not tested in real life conditions over an extended period with a shortage of trained staff. However, during my time as Chief of Staff, I ensured that a series of live operational reviews and lessons learnt reviews were conducted across all functions of the NI HUB and the wider C3 arrangements and their recommendations implemented immediately. Also, as I will highlight later in this statement, before I finished my role as Chief of Staff I put in place arrangements with Ministry of Defence's Joint Liaison Officer (JLO) and the local Brigadier to provide one of their senior emergency planning officers to the CCPB team to carry out a further in-depth review of all aspects of the C3 structures and their operations with the aim to develop an implementation plan that would pull together the relevant recommendations from all the various reviews to ensure we closed all potential gaps and addressed any remaining weaknesses. This work was to the best of my knowledge overseen and successfully completed by Andy Cole.

12. Once I had received the CONOPS document I somewhat naively assumed that it would simply be a matter of following the set procedures and the various aspects of the response would immediately fall into place. The biggest assumption I made was that the staff who had been trained as part of the Yellowhammer preparations would turn up and that I would have a fully staffed and well-trained team to begin operations. Unfortunately, that was not the case. Had it been the case then I believe that the process would have been much smoother and the start-up of operations much easier. For example, the team would have known the operating requirements, and the personal contact points would have existed between the NI Hub, the DOCs and the other key C3 elements.
13. Initially, I was given access to the permanent staff within the NI Civil Contingencies Policy Branch (CCPB), which should have been around seven individuals. However, I quickly discovered that a number of those individuals were either shielding at home or had been absent for some time. As a result, I only had access to three of the staff. The temporary Grade 7, the most senior member of the available team, informed me that she too would be shielding by the end of the week and would only be able to work from home. There was also a Grade 5, Bernie Rooney, who, although not part of the CCPB team, had been there from the end of August 2019 to carry out a strategic review of CCPB. I was made aware that another review of CCPB by PwC had been procured to test its efficacy in the face of a no deal Brexit in 2019. As far as I know the report dated 28 November 2019 highlighted

lessons learnt from the Yellowhammer exercises and made 75 key recommendations. In respect of changes needed to systems and procedures, but due to a shortage of staff and the beginning of the Covid-19 crisis my understanding is that that work was not undertaken, as Bernie Rooney was pulled into more immediate work associated with the developing Covid-19 crisis.

14. Having spoken with Chris Stewart, Bernie Rooney and the temporary Grade 7 I estimated, based on the Yellow Hammer planning assumptions, that we would require somewhere in the region of 30 to 40 staff to run one Hub team and that I would need at least three teams to make the Hub viable on a seven-day week basis. Therefore, my initial actions were aimed at finding suitably experienced staff who would be willing to work inside the Hub, a facility that did not allow for any real form of social distancing as it was designed to operate principally in one large room with staff operating in proximity to ensure there was rapid dissemination of information and speedy confirmation of actions.
15. In spite of the limited ability to socially distance in the Hub, every effort was made to reduce the risk of the virus spreading. For example, a one-way system was put in place to reduce close contact with others when on the move and workstations were cleaned thoroughly at least once day. Colleagues staffing the Hub also brought in cleaning facilities and hand sanitisers to ensure surfaces and hands were cleaned several times a day. This was because initially we had no access to such cleaning materials, and it took some weeks to have them provided by the NICS although there was a significant increase in the frequency of cleaning provided by the contract cleaners within Castle Buildings who wiped surfaces and cleaned door handles several times per day.
16. A request was made by Head of the Civil Service (HOCS) for staff to work in either the NI Hub or in the DOCs (**Exhibit AH/5a - INQ000389181, Exhibit AH/5b - INQ000389182**). However, I found it very difficult to acquire the staff I needed in those first few days as most Departments - when they had activated their DOCs a week earlier - had selected many of the trained staff that were available to work within their own DOCs. Aside from the Yellowhammer volunteers who were taken by the DOCs, I had thought that the majority of the rest were either shielding themselves or had decided to stay at home to care for relatives who had to shield. However, I later learned that there had been significant disputes with staff who had been trained for Yellowhammer and their union representatives, as they were informed following the Yellowhammer exercises that they would not be paid any additional salary or allowances for their work on Yellowhammer. They were not even given meals during their shifts and were expected to bring in their own

food. I now believe that that dispute was probably the main reason why so many of the volunteers did not come forward when I initially requested their help. I have recently learned that both TEO and the NIO were aware that there would be difficulty in staffing the NI Hub as early as 12 March 2020 due to the lack of remuneration during the Yellowhammer exercises, but I was not made aware of this at the time (**Exhibit AH/6 - INQ000371639**)

17. I did manage to engage around 15 additional staff in those first few days and that was done by reaching out to colleagues, mainly in DoJ, TEO and the Strategic Investment Board (SIB), asking for their help and support. I also felt that even if I were successful in acquiring more staff, I would perhaps not have the range of skills and experience needed within the team, so I contacted each of the main consultancy firms in NI and invited them to collectively meet with myself and HOCS on Monday 23 March (**Exhibit AH/7 - INQ000279354**) and (**Exhibit AH/8 - INQ000301369**). I also invited along colleagues from the Department of Finance's Procurement Directorate – Construction and Procurement Delivery (CPD) and from SIB.

18. At this meeting I outlined the difficulties we were facing in terms of skills and experience due to many staff opting to self-isolate for medical or family reasons. I said that this was a national crisis of proportions that none of us had seen before and that I expected all of them to work with us to tackle this crisis. I explained that we would of course pay for their services but that I expected those services to be priced in a manner that reflected their corporate and moral contribution to this crisis. They all agreed with that approach and said that they would identify staff with the appropriate skills and experience for our consideration. I explained that we would issue contracts for the services provided and that despite the crisis and urgent need, we would, through CPD and SIB colleagues, ensure that all standard procurement rules and regulations were followed. To ensure this was achieved in an effective and timely manner I contacted a recently retired Senior Civil Servant, Eugene Rooney, and asked him to undertake this work for me which he agreed to do at no cost (**Exhibit AH/9 - INQ000366133**).

19. This was the same day that the Prime Minister announced the UK-wide lockdown. I was only in post five days at that stage and whilst I agreed with the lockdown, given the rapid acceleration of the R number, I cannot comment on whether or not it could have been avoided if earlier interventions had been adopted as I have little knowledge of what happened before 18 March 2020, in terms of what was known and what actions had been

taken to limit the spread of the disease. Based on what I saw on the news in the two weeks leading up to the lockdown, Covid-19 was spreading like a wave across Europe, and I doubt that any measures taken in that period would have had a significant impact in terms of significantly delaying or halting the spread of the disease.

20. I certainly know that in the five days before the lockdown was announced, local Ministers, CCG members and NICS officials were working constantly to see how we could either delay the spread of the disease (and we appeared to be a few days behind GB in terms of infection rates at that stage), or more likely try to mitigate the impacts, particularly on the health service, once it hit. Whilst we were certainly in line with the UK-wide approach we were also searching for any additional steps or actions that could be taken locally to help the situation and slow down the wave to buy as much time as possible as the closer we got to the summer months the pressure on the health service would be lessened. Some of the key issues in the first week or so were around the supply and purchase of Personal Protection Equipment (PPE) initially to the health service and later to care homes and other stakeholders such as undertakers and the drafting of regulations to support the lockdown regime. The supply of PPE for the UK as a whole was being managed centrally by Whitehall teams and locally by the Department of Health (DOH), CPD and the health Trusts. I was aware that colleagues in TEO were also using personal contacts in China to see if they could arrange direct supplies and well as liaising with colleagues in the Republic of Ireland (RoI) to see if they could piggyback on their purchase arrangements. The drafting of lockdown regulations was a matter for DOH colleagues, but I believe in the first instance they were drafted by Chris Stewart in TEO given the pressure that DOH colleagues were under at that time.

21. I saw my role, and the role of the NI Hub, as providing accurate, timely and relevant information and advice to Ministers and CCGNI members and to ensure that any actions tasked to the NI Hub were completed as quickly as possible. This meant gathering, collating and reporting data and information from a very wide range of sources in a single comprehensive document on a daily basis i.e. the Situation Report (SitRep). Our function was to draw together various strands of information that would keep Ministers and CCGNI members sighted on the bigger picture and, where possible, identify issues that were either cross-cutting or which might have impacts on other Departments or stakeholders. As such I was involved in a wide range of meetings and issues and some of the areas I became particularly involved in during my time in the NI Hub included working with the military re: their provision of services under the Military Aid to Civil Authorities (MACA) arrangements; I also engaged with the three major sporting codes to see how their members could help

(**Exhibit AH/10 - INQ000289239**); the provision of data and information to Cabinet Office; supporting the First and Deputy First Ministers in high level meetings, and the negotiations around the work of the Joint Bio-security Centre (JBC).

22. The work with the sporting codes was led by Junior Minister Declan Kearney, and he was very keen to ensure that the sporting codes offers of help could be put to best use. This included acting as distribution networks for the delivery of food parcels or the collection and delivery of medication to those who were unable to leave home because of shielding and when the vaccination programme started the codes also were active in opening their grounds for use as vaccination centres. I will outline data and information supply to Cabinet Office and the work of the JBC later in this statement.
23. Given the rapid escalation of the pandemic and the confusion we all faced in terms of response, those first few weeks were difficult and challenging, and in some ways I thought chaotic. Every department was significantly affected, either through: loss of staff; the need to socially distance staff within the existing estate; finding ways to enable staff to work from home where possible; putting staff safety and hygiene measures in place; dealing with increasing demands from a wide range of sources; and taking on new tasks they had no experience with, such as setting up and running covid-19 financial support schemes for people who were unable to work normally. All in all, it was a difficult and confusing time and the overriding priority I believe for most Departments was to ensure that they continued to deliver their existing services, develop new services or schemes required to support vulnerable individuals and communities as well as supporting their Minister.
24. In addition to making the approach to the private sector, I also engaged fully with the NICS Central Human Resources team who were in the process of setting up a clearing system to urgently match those staff who were willing to come into the office and work with those areas of the service that needed them most. Over the following weeks, this system delivered a significant increase in the numbers of staff willing to work in the NI Hub, although most of them had had no previous experience of this type of work. By the end of the first week of operations the NI Hub only had around 20 NICS staff who were supplemented by staff from SIB and the consultancy firms. I had brought in experts in data analysis, technology, and organisational development. The initial Hub team was therefore a mixture of volunteers from the NICS and SIB, most of whom had no Yellowhammer experience, and staff from the consultancy firms.
25. I assigned roles to individuals based on their general experience and willingness to undertake the various tasks. Those with Yellowhammer experience took on the more

demanding roles even though they may have had more senior staff working directly to them. I was not particularly worried about grading or whether the staff were internal or external to the NICS, I was focused on experience and ability for the roles I had to fill. As we progressed and more staff became available some team members swapped roles and moved into other roles that they found more suited to them. Within three weeks we had gathered another 100 NICS staff enabling us to create a senior NI Hub team, a functional lead structure and three rotational shift teams.

26. The external consultancy staff were recruited from Price Waterhouse Coopers (PwC) and Ernst and Young (EY) as I discovered that they had been involved in establishing the NI Hub, designing the workflow models, or training NICS staff, as part of the Yellowhammer exercises. This allowed me to rapidly access knowledge and materials that I was previously unable to, due to the lack of availability of the permanent CCPB Staff for reasons outlined above.
27. Given that Covid-19 required a different form of response to that set out in the Yellowhammer plans, I used the consultancy staff to amend and modify the Standard Operations Procedures (SOP's), to document the new approaches, to establish work shift rotas and train the staff who volunteered to work in the NI Hub and DOCs. They also helped design the daily Situation Report or SitRep that I planned to issue.
28. The role of the DOCs was the first area of the C3 structures that I reviewed on 6 April 2020 (**Exhibit AH/11 - INQ000255301**). This was because their effective operation was essential to the success of the NI Hub as the DOCs were responsible for the co-ordination and supply of all information within and from their Department. It was clear to me in the first few days that those information flows were not operating as well as they should and, in some cases, there were no Departmental Liaison Officers available to work within the NI Hub, making meaningful contact with the DOCs almost impossible. The review confirmed my concerns, and we used its findings to quickly develop solutions and workarounds to ensure the DOCs provided the information we required and acted as the main point of contact for their Department. The solutions and workarounds included some of the Departmental Liaison Officer (DLO) roles being filled by a number of individuals who could work on a rota within their department rather than a single name individual, facilitating remote working for some DLO's who felt unable to work within the HUB on an in person basis, ensuring that all DLO's were aware of and working to the latest version of the CONOPS and providing daily feedback back to the DLO's on the outcome of the previous day's work covering the discussions at CCGNI, the Executive and the details of

the completed SitRep (**Exhibit AH/12 - INQ000065793**). The report also allowed me to impress upon colleagues in the various departments the importance of the DLO role and the need to ensure sound two-way communication between the HUB and the Department via their DOC.

29. I was keen to ensure that we shared a compelling narrative with all staff, explaining the crucial role they would play over the course of the pandemic, and to enable them to fulfil their roles. It was essential that staff recognised their contribution, and this was further underlined when HOCS and the Permanent Secretary of the NIO jointly issued a note to all C3 staff on 7 April 2020 entitled 'Coronavirus Emergency: Northern Ireland Civil Service & Northern Ireland Office Collaboration' (**Exhibit AH/13 - INQ000371644**). This document thanks staff for their work, outlined the role and importance of the C3 structures, the Priorities for C3, the key information flows, the approach to decision making, the role of the NIO and Cabinet Liaison Officers. We also established an extensive programme of training and development using the trainers I had brought in from PwC and EY. On a more practical note, I ensured that we provided all NI Hub staff with lunch, snacks and soft drinks throughout their shifts as I could not afford them trying to find shops or cafes that were open, and who would serve them, because that would have significantly increased the risk of them becoming infected with Covid-19 and bringing that back into the office. It was a small but important gesture that also garnered considerable gratitude from the staff.
30. Another area we quickly excelled at was the introduction of new technology. With the skilled staff we took on from SIB, we were able to create new digital platforms for the processing and sharing of information, as well as ensuring we had sound governance structures in place. When I sought the help from the consultancy firms, I made sure that I created a key role specifically to help me in this initial set up phase, that of a 'Critical Friend.' I asked the firms to supply me with names and CVs of any individuals they may have in their employ who had significant past experience of emergency planning or Gold Command experience. They supplied me with several names and CVs but the one that clearly stood out for me was Sir George Hamilton (**Exhibit AH/14a - INQ000366136** and **Exhibit AH/14b - INQ000366134**) - the recently retired Chief Constable of the Police Service of Northern Ireland (PSNI). I had worked with Sir George over very many years, and I was very aware of his breadth of experience, so I was delighted to have him available to support and challenge me through that period of time. He was an associate of PwC and came on board quickly as part of the team they supplied.

31. Sir George started work along with the rest of the team selected from PwC which I recall was towards the end of the week commencing 23 March. I found his advice and counsel extremely helpful during those first few weeks as he was able to provide an experienced view on issues such as the 'battle rhythm' for reporting frequencies within the HUB structure, the identification of and management of risks within a fast moving critical incident scenario, the need for pre-briefs before and debriefs following CCGNI, Executive and COBR meetings to ensure action points were appropriately reported, allocated and progressed. We discussed prioritisation of issues and allocation of tasks to individual team members to ensure optimisation of resources. His experience of working across multi-discipline teams and with multiple key stakeholders at the COBR/ National level was also insightful in terms of making sure we anticipated, as far as possible, the sort of questions that might be asked and the types of data that would be helpful to have available e.g. how many staff engaged in the Hub, when we anticipated being at full capacity, what actions were we taking to secure appropriate resources, what difficulties were we encountering and how were we tackling them.
32. During that initial set-up period I ensured that we quickly formed collaborative, strategic relationships with a very wide range of partners and stakeholders in what undoubtedly was the most challenging situation any of us had ever faced. I ran the NI Hub from 18 March 2020 until 31 July 2020, after which I returned to my permanent role as Director of Access to Justice and Chief Executive of the NI Courts and Tribunal Service. Whilst I cannot comment on any issues that occurred either before or after those dates as I had no direct involvement in the work of the NI Hub outside of the period I acted as Chief of Staff, I am aware that when the NI HUB was stood down in July 2020, the work it had been engaged with, and the recommendations made by the various reviews I had commissioned, became the responsibility of the CCPB team and that that team, under the leadership of Andy Cole, continued to provide strategic advice and guidance to HOCS and the Executive.
33. In terms of the scope of the Chief of Staff role, it was my responsibility to lead the NI Hub and ensure that each of the wider C3 elements operated as set out in the CONOPS manuals, that all relevant data and information was, where possible, gathered, collated, and shared to aid the CCG and the NI Executive make the most appropriate decisions. As I have already pointed out the NI Hub itself had no decision-making remit. As mentioned above, I oversaw the production of the daily Situation Report (Sitrep). See **Exhibit AH/15 - INQ000371638** for the first SitRep produced on 20 March 2020. I ensured that it was issued each evening to the CCG and discussed each morning at the daily CCG meeting. The CCG meeting was chaired by HOCS, and it brought together Ministers,

Permanent Secretaries, leaders of the emergency services and Local Government to discuss key issues, decide courses of action and agree who did what. I supported HOCS in those meetings, ensuring he was fully briefed and that all urgent issues were identified and discussed. Normally, I would provide the meeting with an update on live issues within the Actions Log, provide an overview of the main issues on the current Sitrep and take members through the list of items for escalation. The Sitrep was also shared with each Minister and was discussed at NI Executive meetings, which were held several times each week. The purpose of the Sitreps was to provide a daily update to both groups as a means of helping them to make informed and collaborative decisions. In line with normal Gold Command protocols, we worked on the basis that decisions and actions should be taken at the lowest appropriate level and strategic issues or actions requiring cross cutting approvals were escalated, as necessary. In practice most operational decisions were taken at Department or stakeholder level and strategic decisions were taken at NI Executive meetings. Few decisions were taken at the CCG meetings.

34. As mentioned, I accompanied HOCS to the NI Executive meetings, where he would go through the Sitrep with Ministers, highlighting any new developments, significant issues, or areas for decision. Whenever required I would provide the background to the new developments, answer questions in relation to the data contained within the Sitrep, and update Ministers on any discussions I had had with the other administrations. Whilst I have no capacity to judge whether the Minister of Health, the First and Deputy First Ministers and other core decision-makers (for example senior civil servants) had a sufficient scientific mindset and grasp of the scientific, medical and mathematical concepts in order to understand the advice provided, I can say that to the best of my recollection I know that I (and I assume it would be no less true for Executive Ministers, officials and CCGNI members) quickly came to terms with the terminology and scientific implications of the pandemic thanks to briefings from the Minister of Health, the Chief Medical Officer (CMO) and the Chief Scientific Advisor (CSA) and their teams. We all quickly understood the impact of a rapidly increasing R number, the need to reduce face to face interactions and social distancing, the importance of good personal and environmental hygiene, including the washing of hands and cleaning of door handles and surfaces. CMO and CSA explained the modelling they had carried out in conjunction with Whitehall colleagues, including worst case scenarios, current levels of infection and hospitalisation, and explained the latest information and guidance from SAGE (Scientific Advisory Group for Emergencies). As the days and then weeks passed, there was a greater understanding and knowledge of how the disease was being transmitted, new approaches such as the wearing of face coverings and the erection of glass partitions became the norm. There

was also a realisation of how fragile the food supply chain was and the need to protect food production and distribution whilst maintaining safe working and shopping environments.

35. I regularly briefed the First Minister and deputy First Minister and joined them on COBR meetings and calls with the Prime Minister and other First Ministers. My role was to take a note of the main points arising during the meetings and to share these with the two Private Offices and HOCS (**Exhibit AH/16 - INQ000389180** and **Exhibit AH/17 - INQ000255030**). The NI Executive had only just been re-established on 11 January 2020 and Ministers were quickly trying to get to grips with their portfolios when the pandemic hit some six weeks later. During my time as Chief of Staff I believe I witnessed a greater willingness amongst Ministers to work together to collectively tackle problems. However, the concept of 'jointery' was new to me as I had never worked in TEO before, and it took me a little time to realise how that operated and how to draft and share minutes for joint Ministerial clearance. Jointery is the process of ensuring that both the First and Deputy First Ministers are communicated with in tandem, so that each receives the same information, data, updates, and sight of all briefing material, at the same time. It also means that both Ministers agree, in unison, any steps or actions that are to be taken or any papers that are to be discussed at Executive meetings. In practice this meant that whilst I completed any briefing or any draft minutes of meetings, that I shared it via the same email to both Ministers and their respective Private Offices. This in no way changed either the advice I provided or made my role any more difficult, it was simply a different way of working. I was not involved in any discussions or debates regarding the use of cross community votes and therefore cannot comment on its use or otherwise by the NI Executive. My experience was that the NI Executive functioned well during the period I held the role as Chief of Staff and was able to take collective decisions re: strategy and approach. There appeared to be a willingness on the part of all Ministers to support each other, especially with regards to the Health Minister, and there was a certainly an overriding concern to protect the public.

36. Whilst, at times, there were of course differing views or emphasis on certain issues, by and large First and deputy First Minister appeared to have a united approach during NI Executive Meetings, COBR meetings and when briefing the public. The only time I saw any real tension was in July 2020, after the Bobby Storey funeral on 30 June 2020, when the relationship between the two main parties became strained. Certainly, before the funeral the NI Executive appeared to work quite well and managed to get through a considerable amount of business and find agreement to most issues. The Minister of

Health also seemed to have strong support from other Ministers and there appeared to be a willingness to help support the Department of Health (DOH) in any way possible including helping DOH draft legislation and regulations to enable the lockdown restrictions to be enforced. Towards the end of my role as Chief of Staff I could see some tensions around the easing of restrictions in terms of pace and scope, all of which had to be supported by the DOH and the Health Minister, otherwise the restrictions stayed in place.

37. I did not regularly attend or participate in the Ministerial Implementation Group (MIGs) meetings as they were the remit of the appropriate Minister, supported by Karen Pearson, Director of EU Relations or one of her team. I think I may have joined one, or at most two such meetings, purely as an observer to see how they operated in practice; however I had no formal role in these meetings and did not participate in them. I did hear readouts from a range of these meetings when officials were briefing either CCGNI or the Executive on what had been discussed at the various MIG's. Generally, Whitehall Ministers led these meetings along with Ministers from the Devolved Administrations and officials normally only spoke when requested to provide more detailed information. The meetings provided Ministers with an opportunity to discuss key issues with their counterparts in the other regions and whilst I cannot comment on how useful Ministers found these meetings, or how the discussions and the information they provided, impacted on either individual Ministerial or collective Executive decision making. However, to the best of my recall, Ministers found the MIGs useful. I understand that there were also official only meetings ahead of the MIGs that would agree agendas and would try to clear as many of the issues as possible ahead of the meetings. Ministers would then be briefed in advance on the key issues for discussion or agreement. As I have mentioned readouts of the various MIGs were shared with CCG and NI Executive Ministers and I feel the information gained from them helped formulate NI Executive policy as they gave the Ministers a clear understanding of the direction being taken by UKG, and the approaches being taken in the other jurisdictions. I believe Ministers were not happy when the MIGs were deactivated as they missed the insight these meetings gave them, especially in terms of the thinking and approach of UKG Ministers. I am not sure what new consultative or briefing arrangements, if anything, replaced the MIG meetings, but I am aware that meetings with the NI Secretary of State continued after the MIGs ceased. I am not in a position to identify to what extent those meetings filled the gap left by the MIGs post-June 2020 or how adequate or otherwise any replacement mechanisms for the communication of issues related to Covid-19 to the UK government which related to Northern Ireland as I left the Chief of Staff role just a few weeks later.

38. During that first wave of the pandemic, Karen Pearson and her team led on the strategic issues that arose as well as the recovery process and relaxation steps as infection rates eased and we began to see the possibility of the lockdown coming to an end. On 19 March 2020, the day after I took up my role as Chief of Staff, Karen presented a Planning Framework paper (**Exhibit AH/18 - INQ000371637**) to the NI Executive and Ministers agreed the six headline planning clusters set out in paragraph 3 of the paper. The first few Sitreps were modelled on these planning clusters, but it soon became evident that they were too wide and unwieldy to be the basis of a meaningful Sitrep, so we moved to a more issues-based approach. That lasted for the next few reports, and it was not until Sitrep 6 on 30 March 2020 that we finalised on the format that we would use for the next sixty reports. The finalised format was much more user friendly and wherever possible used tables, graphs, and info-graphical approaches to highlight relevant information. The key elements of the reports included:

- a. A list of main developments, including the number of covid deaths, number of new outbreaks, traffic flow changes, economic developments and departmental initiatives.
- b. Main issues, broken down into new and existing issues, indicating lead owner and a Red, Amber or Green traffic light flag to indicate urgency.
- c. A daily Data Summary highlighting key data from departments or open sources for example, a summary of the DOH Dashboard, economic data, policing data, societal data such as church service attendance.
- d. Current media and communications issues or topics in Northern Ireland including a forward look at key developments as well as highlights from the UK generally, the RoI and rest of the world.
- e. Themed update reports covering:
 - Health and Care
 - Economy and Infrastructure
 - Justice
 - People and Communities
- f. A section of supporting information that contain key information that had relevance at that particular point in time.

39. The NI information contained within the Sitreps came from the DOCs or other key stakeholders whereas the data relating to the Republic of Ireland mainly came from the British Embassy in Dublin (**Exhibit AH/19 - INQ000277084**) or, like that relating to other jurisdictions, was gathered from open-source materials by the EY data analytics team

whose role it was to pull together the various data sources for inclusion in the daily reports. I am aware the various departments, but most notably the Department of Health, would have bilateral discussion with colleagues from the RoI and occasionally, some references to the RoI may have come directly from one of the DOCs following such a meeting or discussion between officials or Ministers. There were also a number of meetings between the First and Deputy First Ministers and Senior Officials in the Irish Government, including the Taoiseach, some of which I attended (**Exhibit AH/20 - INQ000279440**, and **Exhibit AH/21 - INQ000279441**). These meetings gave Ministers in both jurisdictions the opportunity to discuss the current position, the approaches being taken, the introduction or easing of restrictions and cross border travel issues. As a result of these and conversations with colleagues at the time I am vaguely aware that in those first few weeks of the pandemic there were discussions at Ministerial level about whether there should be an all-island approach to the pandemic or a greater emphasis on following a UK-wide approach. I believe the agricultural approach to epidemiological issues was highlighted as a possible model to follow however I understand that the NI Executive felt that whilst it was important to keep in close contact with colleagues in the Republic of Ireland there seemed to be more relevance to following the UK-wide approach. I am not sure of the reasons for this decision. Other considerations I am sure were the fact that majority of the financial and economy support schemes were Whitehall funded and there was a need to protect and maintain the food supply chains both into and out of NI, and our main trading partner was GB. Closing all connections with GB would have had serious implications, which is why additional financial support was given to the ferry companies and hauliers to maintain those supply chains.

40. Whilst I know that NI Departments kept the lines of communications open with their respective colleagues in RoI, these were done at departmental level, and I cannot comment on how they worked or operated during my time as Chief of Staff as I did not have sufficient awareness of the detail but I understand from general discussions at the time that colleagues in NI struggled to get meaningful information from their counterparts in the RoI ahead of public announcements. Neither the NI HUB nor I as an individual made direct contact with colleagues in RoI. This was because I was not aware of a similar body or direct counterpart that we could have approached. As individual NI Departments were in communication with their respective RoI counterparts, it would not have been appropriate for the NI Hub to cut across those working relationships by making direct approaches to individual RoI Departments. I was not aware of the memorandum titled 'Covid-19 Response – Public Health Cooperation on an All-Ireland Basis' and I had no direct involvement in specific areas of cross border co-operation. Neither was I aware of

any specific comparison of outcomes in terms of rates or infection between the two jurisdictions.

41. A key area that I was drawn into as Chief of Staff was around the creation of the Joint Bio-security Centre (JBC). These discussions came to me in the NI Hub given the pressures on health colleagues at that time. I became the NI representative at official level meetings. The UKG had decided that it would create and operate the JBC to help deal with future waves of Covid-19 and any other such threats in the future. Given that UKG made the decision to establish the JBC, the discussions I was involved in focused on how best to involve the Devolved Administrations in deciding the governance and operation of the JBC. As I recall there was an initial reluctance from the Devolved Administrations as some of the local Ministers felt that they had not been engaged in the decision to create the new model, although I understand that each of the Chief Medical Officers did have an input and that they were supportive of the move. Along with colleagues from Scotland and Wales, we met regularly with the lead officials from UKG and worked through various governance models and operating parameters until we could find a model that Devolved Ministers were willing to agree on. After each meeting I provided a briefing note to HOCS, the Permanent Secretary for Health, other relevant Permanent Secretaries and TEO colleagues. The agreed model covered issues such as operational parameters, accountability, funding, and staffing of the JBC. Once we got to a point where Devolved Ministers were agreeable, a Memorandum of Understanding was signed by the relevant Ministers and the issue passed from me to health colleagues for implementation. This was just as my role of Chief of Staff was coming to an end and I have no information on how things progressed from that point forward.

42. It would be fair to say that given the speed at which we were working we had a very difficult and challenging start but as I have indicated above within a few weeks we had addressed and rectified most of the issues and areas of concern. However, one area that remained troublesome throughout was in relation to access and supply of data. The NI Hub was responsible for the supply of all the NI data to the central Whitehall team and the No. 10 Press Office for inclusion in the daily televised public presentations and I personally was the nominated officer for NI and as such I was responsible for the supply of all data to Central Government. This was a role I felt that should have been taken on by Siobhan Carey, Chief Executive of the NI Statistical and Research Agency (NISRA), given NISRA's role as the body responsible for all publicly released statistical information provided by the NI Government at any other point in time (**Exhibit AH/22 - INQ000274580**). However, whilst NISRA has statistical teams based in each NI Department and it oversees the timing

and release of all such statistical publications, as this data was essentially management information taken from current 'live systems' and not accredited statistical information provided via NISRA verified sources, Siobhan felt that it would not be appropriate for it to be shared either by her or NISRA as that may imply they had a direct role in its production or some form of control over its accuracy. As there was no other centralised body responsible for the collation and dissemination of data the obvious choice was for the NI Hub to take on this role. Following discussion with HOCS it was agreed that I, as Chief of Staff of the NI Hub, would act as the nominated officer for the supply of information to Whitehall and that the NI Hub would act as the central control mechanism for the transfer of data to London.

43. As I have pointed out, this was the one area that continued to prove challenging throughout my time with the NI Hub as the handover of information and access to the appropriate data was difficult, either because it didn't exist, or we didn't know where to look for it. For example, it was initially difficult to obtain figures on a daily basis that: collated hospital deaths from Covid-19; identified stocks of available Personal Protective Equipment; provided details on the number of children and teachers attending school; passengers using each form of public transport; and new systems had to be developed to measure and report on the take up of furlough schemes or the number of applicants for business support schemes or daily increases in the number of Universal Credit claims and calls for advice. Whitehall specified the data sets they wished to construct and report upon and then the NI Hub would liaise with the appropriate NI Departments to see how they would meet the requests. Some areas were easier than others, for example, if the same systems were used in NI as sister departments in Whitehall, whilst others were more difficult because different systems or processes were used in NI e.g. how our hospitals measured inpatient levels compared to England. Often the NI Hub data analytics team would have to explain the reason for not having the requested data or why it was not in the exact format requested by Whitehall, and they would act as go-betweens to find a solution that worked. Mistakes were occasionally made in the reporting of the data or in its interpretation and when this happened, I quickly contacted the key players to sort out the problems as quickly and effectively as possible, to avoid any loss of confidence or trust in the system or the NI Hub processes. However, after the first week of so generally the provision of data for the Sitreps really improved as the C3 structures bedded in and we began to build working relationships at the right levels and with the appropriate contacts in each Department. Similarly, this very much improved the flow of information and data to the UK Government and helped to resolve some of the issues with the flow from NI to them. However, some issues with data remained insurmountable but this was out of the control of the Hub staff,

namely that ward clerks do not work Saturdays or Sundays so that death data was not available until Monday. As far as I can recall this was the main reporting issue that proved difficult to reconcile on an ongoing basis and whilst there may have been others, they were not so significant; however, at this point I do not remember the specific detail of those issues.

44. The key problem was that I was never able to adequately address was the provision of analytical support in terms of data analytics for the NI Hub. Whilst a few statisticians from TEO supported Karen Pearson and her team, I was unable to persuade Siobhan Carey to provide me with statistical staff who would help in the production of data and information for the Sitrep and the supply of information and data to UKG. Siobhan and her staff insisted that as statisticians they only dealt with retrospective, approved statistical data and that they were not experienced or qualified to provide real time information management data. For this reason, the Sitrep infographics, tables and other data were provided by the team from EY, from data directly supplied by the DOCs and other stakeholders.

45. This meant that when we sought to gather and collate data for onward transmission to UKG, the EY team had to chase NICS colleagues for the data. The EY team also had a very steep learning curve both in terms of who best to contact for the data and in terms of its limitations and suitability. When I finished my role as Chief of Staff, I urged HOCS and senior colleagues to develop an in-house information management team who could take over the role provided by the EY team and thus be available to the NI Hub in any future stand ups (**Exhibit AH/23 - INQ000287150**). I believe that after I left, this role was actually passed on to SIB colleagues following a handover from EY and they provided the input to the Sitreps during the second wave of Covid-19 whilst the EY staff supported the work of Karen Pearson and her team.

46. I am not aware of the 'Rapid Focused External Review of Public Health Agency' as I believe that occurred either just before or just after I left the NI Hub, but I am aware that there were difficulties in respect of the reporting of daily death figures as well as the numbers of patients in hospital or on ventilators. This was because NI collected our data on a slightly different basis to GB counterparts. As I recall GB collected and reported their data on a midnight-to-midnight basis whereas NI collected data on an 8am until 8am basis and we did not produce data over the weekends as the figures used are initially gathered by wards clerks on a Monday to Friday basis. This meant that there would be higher figures at the start of each week when whatever happened over the weekends was factored in. This led UKG in the daily 4pm briefings that occurred on Saturdays and Sundays to

highlight that NI figures were not aligned with GB figures for those periods. The figures that the Department of Health supplied to us for onward transmission in respect of daily Covid-19 death figures were gathered for patients who died whilst in hospital and who had Covid-19 at the time of death. NISRA produced weekly provisional death statistics, which were based on death registration information collected by the General Register Office that listed Covid-19 on the death certificate, whether or not Covid-19 was the primary underlying cause of death. The NI Hub reported the daily death figures as supplied by the Department of Health and each week we would highlight the figures supplied by NISRA. These figures, as well as information regarding the R number, were important considerations for the NI Executive whenever they were debating either extensions to or relaxation of lockdown restrictions. As far as the modelling of data re: mortality rates was concerned, that was solely the preserve of the Department of Health and the NI Hub had no input to the process other than to report certain data supplied for inclusion in the daily Sitrep.

47. It was not only health data that was difficult to obtain. Cabinet Office was continually requesting data from across the whole of the NICS and the NI Hub was the focal point for the supply of that data. This meant we were continually chasing colleagues in the DOCs and other C3 bodies for a very wide variety of data, much of which had never been collected or at least not daily. For example, we were asking the Department of Education for details on the numbers of schools open, number of teachers and pupils attending; we asked police for the number of Officers available, number of fines imposed for breaches of Covid-19 regulations; we asked the Department of Infrastructure for the number of passengers on buses and trains, number of ferries operating, volume of traffic on roads; etc. Some of these data sets were already being collected, some were the by-product of other information, and some were completely new, requiring new systems and processes to be established for their collection. This put additional burdens on Departments and did not endear the NI Hub to them as they did not always see what real purpose the data was serving. At these times I had to liaise with the Permanent Secretaries or Chief Executives and explain why Cabinet Office required the data and seek their help and support in getting their staff to provide it. An example of the return provided to Cabinet Office is provided at **Exhibit AH/24 - INQ000254075**.

48. I soon found that the role of Chief of Staff was very eclectic. Each morning I would brief HOCS, then CCG and Ministers, then I could be accompanying Ministers to COBR calls (**Exhibit AH/17 - INQ00255030**) or meetings with the Secretary of State (**Exhibit AH/25a - INQ000254172**, **Exhibit AH/25b - INQ000308862**, **Exhibit AH/25c - INQ000308863** and

Exhibit AH/25d - INQ000308865) and Irish Ministers (**Exhibit AH/20 - INQ000279440**, and **Exhibit AH/21 - INQ000279441**, **Exhibit AH/26a - INQ000277104**, and **Exhibit AH/26b - INQ000279492**), meetings with Devolved Colleagues or colleagues in Whitehall (**Exhibit AH/16 - INQ000389180**, and **Exhibit AH/17 - INQ00255030**), and **Exhibit AH/27 INQ000308867**). I also met Church leaders and joined Ministers in joint meetings with the various church leaders. These meetings discussed the distress caused because families and friends could not attend the funeral of a loved one, the impact of restrictions on church services and access to buildings for private prayer and later the lifting of some restrictions (**Exhibit AH/28a - INQ000279257** and **Exhibit AH/28b - INQ000279385**). I met with colleagues from various Departments to discuss any issues that had arose or that were beginning to emerge to see what help and support we could offer or how best to reflect those in the Sitrep reports. I worked closely with military colleagues and briefed the Brigadier of 38 Brigade each week. I updated him on current issues and discussed all requests for Military Assistance for Civil Authorities (MACA). Whilst we largely followed the UK-Wide approach to most issues I believe that NI, like the other Devolved Regions, did have its own specific approaches to dealing with the pandemic, whilst still being part of the national UK-wide agreed response measures. By and large, whilst Whitehall set much of the agenda in terms of lockdowns and support packages, the detail of implementation and the passage of legislation was generally carried out by the NI Executive supported by the NICS.

49. From the very start of my time as Chief of Staff I was keen to ensure that we documented our work and ensured that we either produced or updated all relevant operational and training materials to ensure that they would be readily available for any future stand-up of the C3 arrangements. Amongst the first things I did once we got the PwC consultants onboard was to ensure we reviewed and updated all the SOP documentation (**Exhibit AH/29 - INQ000371643**, **Exhibit AH/30 - INQ000255303**, **Exhibit AH/31 - INQ000255302**) to ensure the Hub and the wider Civil Contingency Structures were operating in the most efficient and effective manner. As I have already indicated I firstly commissioned them to review the operation of the nine DOCs which they did within the first two weeks of the NI Hub activation. In May 2020, I commissioned Mark Byers, a colleague from the Northern Ireland Office, who had been a lead in the Yellowhammer and other critical planning exercises to carry out a 'Point in Time' review of the wider elements of the civil contingencies' architecture (**Exhibit AH/32 - INQ000371642**). That review helped us redefine roles and structures and gave clearer definitions to certain roles. In June 2020, as the first wave of the pandemic was beginning to slow and the focus was shifting to recovery, I asked Dr Andrew McCormick, Director of International Relations, to

commission EY to carry out a lesson's learnt programme and provide a report that would be shared with all key stakeholders (**Exhibit AH/4 - INQ000023223**). Neither Andrew nor I were impressed with the draft report provided to us and we had to ask EY to significantly redraft and refocus the document. The concern was that the initial draft report appeared to be more a collection of random comments and complaints from various individuals that lacked either evidence or substance. Whilst the final report was much improved, I was still not overly impressed with it. However, I did put in place a plan to ensure that all substantive issues raised with the recommendations were actioned and solutions found.

50. Given my concerns with the document I commissioned one further review of the complete C3 structures and operations. I approached the MOD's Joint Liaison Officer (JLO) and the Brigadier and asked if they could provide me with one of their senior emergency planning officers who I could embed into the CCPB team to carry out an in-depth review of all aspects of the C3 structures and their operations. The JLO made available one of his team and that individual became part of the CCPB structure on a seconded basis for the period of the review and during the implementation period.

51. As we moved into the middle of May of 2020, there was a significant reduction in the R number, the levels of infection were falling, relaxation of lockdown restrictions were being introduced and the emphasis across government was beginning to shift to the recovery phase and by June 2020 this shift in emphasis increased and in response to the needs of CCGNI and the Executive the NI Hub started to reduce the number of Sitreps produced each week. However, the EY Data Analytics team was still working at full capacity but the focus was shifting at that stage to work as much, if not more, with Karen Pearson's team gathering statistics and data regarding relaxation and recovery. By July 2020, the team were working almost exclusively in that field, producing draft recovery Sitreps that were still pulling data from across the NICS and other relevant key stakeholders from the public and private sectors as well as community and voluntary groups. These reports were being shared with Executive Ministers and the information contained within them was being used to help set the Executive strategy. In terms of the relaxation of restrictions as I have pointed out this work was led by the NI Executive, supported by Karen Pearson and her team, including data analytics provided by the EY consultancy staff. I know that each suggested relaxation was discussed at length by Ministers at NI Executive meetings and that each proposal had to have a paper that indicated the views of the Chief Medical Officer and Chief Scientific Advisor. Each suggested relaxation also had to have an estimate of the possible impact on the R number. Each party in the coalition also had its own views but generally they all shared a very cautious approach and as I recall our relaxation timetable

and key dates were behind other UK jurisdictions, mainly because we were on the tail of the UK wave and because Ministers did not wish to risk the safety of the public by moving too quickly. As an observer of the process, I shared the views of Ministers and felt it was important to reduce the restrictions in a safe and controlled manner and I believe we achieved that.

52. I did have some concerns about the 'eat out to help out' initiative set up by the UKG as I personally felt that it was too soon to encourage people to go out socialising together. I did believe that there would be a second wave of Covid-19 and felt that as we got closer to the autumn and winter periods there would be a significant upturn in infection rates. It was for this reason that, before moving back to my substantive position in Justice at the start of August 2020, I submitted proposals to HOCS on how best to restructure CCPB and recommending that the NI Hub be activated again in October 2020 in either a full or shadow mode (**Exhibit AH/23 - INQ000287150**). I said that I was convinced that there would be a second wave and that we needed to ensure we had a prepared and ready response available should that occur. HOCS agreed with my proposals, and he instructed TEO to appoint a dedicated full time Grade 5 position to lead CCPB (**Exhibit AH/34 - INQ000255317**). This role was created to oversee the ongoing challenges presented by Covid 19 and any other serious civil contingency threat. Andy Cole, an existing substantive Grade 5 in TEO, and one of my two deputies during my time as Chief of Staff, was appointed to the role.

53. Over the course of the next year or so, Andy led the CCPB team, oversaw the implementation of the various recommendations flowing from the different reviews I had commissioned, activated the NI Hub again in October 2020 and oversaw the production of the Sitrep reports from October 2020 to February 2021. I am not sure how the NI hub operated during or after this period as I had no direct interactions with it after July 2020 and for this reason, I have no insight into the position or trajectory of the disease other than what I read in the papers or saw on the news. However, I believe that the political priorities remained the same, which was to protect the public, limit the spread of the disease and, as far as possible, protect the economy. That said I am not able to comment on decisions made or issues discussed by the NI Executive after July 2020 as I no longer had access to the relevant papers or knowledge of Ministerial discussions.

54. In terms of informal discussions or decision making throughout my time as Chief of Staff I ensured that notes of meetings or relevant discussions were made and recorded for the record. I asked Bernie Rooney, who acted as one of my deputies, to record these

discussions and make file notes. If I attended meeting with Ministers or external partners where Bernie was not in attendance, I drafted the note myself. I took notes of the meetings with First and deputy First Minister and made notes of the COBR discussions that I attended with Ministers and shared with First and deputy First Ministers for their information. I also ensured that one of my staff from Justice who worked alongside me in the NI Hub acted as my PA and she ensured the appropriate filing of those documents. I have no recollection of any key decisions being made that were not formally recorded. At the start of the pandemic, like the majority of staff within the NICS, I started using WhatsApp as a means of communication. This form of communication was new to me, but I found it extremely useful as it allowed me to pass messages and information to and between relevant groups. I also used SMS messages on occasion but found that the WhatsApp platform was more effective and efficient.

55. I was given a dedicated BT Conference Call number that I could use at any time to set up teleconferences and as the weeks progressed, we all made much greater use of a wider range of new technologies such as ZOOM and Teams for videoconferencing. I had two mobile phones, my own DoJ phone and a Chief of Staff phone I was given when I took up the role. The vast majority of interactions were via my DoJ phone as everyone knew that number, so it was easier for me to use that one. When I left the role of Chief of Staff, I handed back the Chief of Staff phone and I am not sure what happened to it or to the messages it contained but I did retain all the messages that were sent or received on my DoJ phone, which I have shared with the TEO Covid-19 Inquiry Team.

56. My overall view of my time as Chief of Staff of the NI Hub was that it was a significant moment in my career that I will never forget. It was a very diverse and multifunctional role that saw me involved in a wide variety of meetings with key stakeholders and external parties as well as overseeing the management and delivery of daily Sitreps, provision of daily data sets to Cabinet Office and the Number 10 Press Office, and handling of ad hoc requests for guidance and support for organisations ranging from the Parades Commission to local charities. I worked 16 to 18 hours a day, every day from 18 March 2020 until 11 April 2020. My first day off was the Easter Sunday 12 April 2020, 25 days without a break. It was a very steep learning curve and whilst the NI Hub and C3 arrangement had a difficult start we quickly came to terms with the challenge and in a very short space of time we had set up an effective and efficient operation that served us well throughout the first wave, mainly due to the hard work and dedication of all the staff involved in all the key structures and supporting bodies. I do believe that we fulfilled our mandate and whilst I cannot comment on how the C3 arrangement fared in the following

waves I can say that the work put into the constant reviews and lessons learnt approach during that first wave we left a much stronger set of systems and processes in place and certainly improved the ability of the NICS and its partners to stand-up the arrangements in better shape than they were on 18 March 2020.

Statement of Truth

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

Signed: Personal Data

Dated: 15-1-24