

Tuesday, 4 March 2025

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2 (10.00 am)
3 LADY HALLETT: Mr Wald.
4 MR WALD: My Lady, our first witness this morning is
5 Professor Albert Sanchez-Graells. Could the witness
6 please be affirmed.
7 PROFESSOR ALBERT SANCHEZ-GRAELLS (affirmed)
8 Questions from LEAD COUNSEL TO THE INQUIRY FOR MODULE 5
9 MR WALD: Professor, could you start your evidence by
10 stating your full name, please.
11 A. My name is Albert Sanchez-Graells.
12 Q. Thank you.
13 Professor, you have produced, and we are grateful
14 for it, a very comprehensive report. It is Inquiry
15 document INQ000539153, to which we will be referring on
16 a number of occasions in the course of your evidence
17 today. Can I confirm that it's your own work, that you
18 are aware of your obligations as an independent
19 witness --
20 A. (The witness nodded)
21 Q. -- and that you've signed it and that it's true to the
22 best of your knowledge and belief?
23 A. Yes, that's correct.
24 Q. Thank you for that. By way of brief introduction,
25 Professor, you were asked, were you not, to provide

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1 including ones specific to procurement and Covid-19,
2 which are listed in your report. I won't go to those
3 now. You were asked in relation to your expert evidence
4 to split it in a three temporal sections: first prior to
5 the pandemic or prior to 1 January 2020; is that right?
6 A. That's correct.
7 Q. Second, between 1 January 2020 and 28 June 2022?
8 A. Yes.
9 Q. Then, third and finally, after the pandemic, as defined
10 as being after 29 June 2022 and onwards?
11 A. Yes.
12 Q. Yes. All right. I want to ask you, then, in relation
13 to the temporal scope of your evidence and, to the
14 extent that it's relevant, Brexit, which falls within
15 that initial period, could you offer a summary of the
16 evidence that you've given in your report, please?
17 A. Yes. So I think it's important to contextualise the
18 timing in which the procurement for the pandemic took
19 place, which overlapped for the first year with the
20 transitioning out of membership of the EU, but, despite
21 the fact that the UK left the EU and then was in
22 a transition period and eventually fully left, the rules
23 were consistent throughout the period. And also,
24 despite the fact that the government at the time had
25 quite vociferously complained about the EU procurement

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1 an expert report on the key principles, important legal
2 frameworks and relevant guidance in respect of public
3 procurement by the UK Government and devolved
4 administrations, and how this may be improved in the
5 future?
6 A. That's correct.
7 Q. In terms of your own background, you are a professor of
8 Economic Law at the University of Bristol --
9 A. Yes.
10 Q. -- Law School; is that right?
11 A. That's correct.
12 Q. You have previously held numerous academic posts. You
13 have a European doctorate in law on your thesis, *The*
14 *Interaction Between Procurement and Competition Law?*
15 A. That's correct.
16 Q. Your particular research and expertise interests
17 concentrate on the way in which the public sector
18 interacts with the market and how it organises the
19 delivery of public services, especially healthcare?
20 A. Yes.
21 Q. At risk of embarrassing you, Professor, you are globally
22 recognised as a leading scholar in the regulation and
23 governance of public procurement; is that correct?
24 A. I think that's correct.
25 Q. All right. You have to your name many publications,

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1 rules and promised a bonfire of procurement law, that
2 change didn't take place and actually the process of
3 review of the EU derived rules only was completed last
4 week and when Procurement Act came into force. So for
5 the purpose of the report, the rules were constant for
6 throughout those three periods you have mentioned:
7 before, during and after the pandemic.
8 Q. We will come back to the enactment of the new
9 legislation -- as you rightly point out, only as
10 recently as last week -- in due course. But before we
11 move on from this topic, there was a joint procurement
12 agreement, or the possibility of a joint procurement
13 agreement, a matter upon which you touch in your report.
14 Could you offer your evidence to the Inquiry in relation
15 to that, please?
16 A. Yes. So while the UK was transitioning out of the
17 European Union, the European Union was starting to put
18 together its own collaborative approach to the
19 procurement of supply, such as PPE or ventilators, and
20 there was opportunity for the UK to join this joint
21 procurement, which, in my view, the UK unilaterally
22 decided not to take. I also explore in the report how
23 the reasons given for not joining are, in my view, not
24 particularly convincing because, even if it was true
25 that specific officials of the UK Government were not

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1 reached because the email addresses were wrongly used by
 2 the European Commission, that didn't mean the UK
 3 Government wasn't aware of those efforts and they
 4 couldn't have chased the opportunity of participating.
 5 It was also clear, in my view, that the opportunity to
 6 participate was open throughout the period, regardless
 7 of Brexit, and I think it's also clear that, at the
 8 time, that was seen as a strangely missed opportunity
 9 for the UK Government to access another route to --
 10 **Q.** Well, that's what I wanted to ask you: no matter the
 11 reasons for non-involvement, what was the effect of
 12 non-involvement?
 13 **A.** So the effect of non-involvement is that the UK was
 14 outside of that collaborative effort that was trying to
 15 source PPE in a flexible way through the creation of
 16 so-called framework agreements. So they were not
 17 definite commitments but were sort of standby
 18 opportunities to draw from those framework commitments,
 19 and that forced the UK to put all of the mitigations and
 20 all of the routes to market that it thought it needed on
 21 its own in place. So I think that, in my view,
 22 exacerbated the risk of buying too much because the UK
 23 was going it alone and was not doing it in a flexible
 24 way, like the European model was doing.
 25 **Q.** You consider that it placed the United Kingdom at

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1 not have committed the UK to actually buy anything under
 2 the European framework, it would just have been
 3 an additional opportunity to access markets in
 4 a different way.
 5 **MR WALD:** All right, thank you. Can I move you on to public
 6 procurement, what is it, if you'd like to say a few
 7 words on that.
 8 **A.** Yes, so I think, in simple terms, public procurement is
 9 a set of rules and policies that try to constrain and
 10 guide how the state buys things or services from the
 11 market. And procurement rules have fundamentally two
 12 purposes: one is to ensure the integrity or the probity
 13 of the process, because it involves very large amounts
 14 of money and opportunities, so we want to make sure that
 15 access to those opportunities is on a level playing
 16 field and that there is no favouritism or corruption in
 17 any way; and it also tries to foster value for money, so
 18 it tries to ensure that the contracts that we put in
 19 place are such that we obtain value because we are
 20 spending taxpayers' money. So procurement rules have
 21 these two considerations of preventing corruption and
 22 preventing maladministration.

23 And procurement looks a little bit different in
 24 different countries but there are very clear
 25 international standards and we also have very clear

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1 a competitive disadvantage in procurement terms?
 2 **A.** I think so. I think it just didn't take up
 3 an opportunity of having more options to source the
 4 materials that it required.
 5 **LADY HALLETT:** Could I ask you to slow down, Professor. We
 6 have a stenographer who is trying to take a note and I'm
 7 sorry, if you have a fast way of speaking, as I do, it's
 8 difficult to change, but if you could just slow down.
 9 **A.** Of course. Apologies, my Lady.
 10 **LADY HALLETT:** Can I just ask you to play devil's advocate
 11 for one minute. So you say it exacerbated a risk and we
 12 should have participated. What are the arguments
 13 against participation?
 14 **A.** So the arguments against participation mainly have been
 15 that, after the fact, the initial efforts from the
 16 European Commission were not particularly helpful and,
 17 for example, PPE had to be rerun.
 18 **LADY HALLETT:** Sorry, PPE had to be?
 19 **A.** Had to be rerun, so the first call to market was not
 20 successful and they had to stop it and then go again to
 21 the PPE market, and so there's the view that it had
 22 not -- it wouldn't have made a material difference at
 23 the time, but I think that's not relevant because the
 24 question was: at the point of deciding whether to join
 25 or not, what was a possible downside? And this would

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1 international frameworks, so fundamentally the rules are
 2 about the process. We try to regulate what transparency
 3 we need to give to opportunities, what times we need to
 4 follow, what sort of objective criteria are permissible
 5 or impermissible, and we try to create harmonisation of
 6 this procedure.
 7 Procurement rules are not about what needs to be
 8 bought or for what purpose. Those are issues for
 9 policy. And in each country the policy looks a little
 10 bit different.
 11 **Q.** All right.
 12 Do remain mindful of the requirement to keep the
 13 pace down if you wouldn't mind.
 14 **A.** Yes.
 15 **Q.** You say that very large sums of money are involved. Do
 16 you know, in broad terms, what the annual spend is for
 17 the United Kingdom?
 18 **A.** So, for the United Kingdom, the estimate is in excess of
 19 £300 billion --
 20 **Q.** All right, and -- sorry, please.
 21 **A.** That represents about a third of the public sector
 22 budget, in simple terms.
 23 **Q.** What proportion of that is devoted to healthcare?
 24 **A.** So the numbers are not always easy to track, but
 25 healthcare is the biggest non-defence spend in any

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1 jurisdiction and certainly in the UK.

2 **Q.** Non-defence spend?

3 **A.** Non-defence spend. So defence probably accumulates also

4 very large amounts. If you're interested in the

5 details, I can --

6 **Q.** No, I think -- because the detail is contained within

7 the report. It's sufficient, I think, for these

8 purposes for you to provide the summary that you are.

9 Let's move on to the aims of public procurement

10 regulation, if we may.

11 **A.** So, as I was saying, the main aims of public procurement

12 regulation are to ensure that there is integrity and

13 good administration in the expenditure of public funds,

14 and those aims fundamentally try to facilitate it

15 through mechanisms of transparency. And that's the

16 short of it. So procurement regulation tries to ensure

17 that the expenditure of public funds is transparent, is

18 accountable, so that we prevent corruption and we ensure

19 value for money to the maximum possible extent.

20 **Q.** Are there different ways of achieving that or different

21 choices to be made?

22 **A.** There are different choices, because procurement systems

23 could be put on a spectrum. You could have very rigid

24 procurement systems that create sort of very easy to

25 follow step-by-step rules, but those are seen as maybe

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1 want to have a very open and accountable system,

2 probably you want to be quite generous in standing, for

3 example, on the opportunities to challenge. If you want

4 to have a very effective procurement system, you

5 probably want to limit challenge. So that's also

6 another sort of spectrum where the systems move.

7 **Q.** Are you able to comment on where the UK sits within this

8 spectrum and that balance between rigidity and

9 discretion compared to other countries?

10 **A.** So I think that the UK sits towards the discretion end

11 of the spectrum, because there are many enablers for

12 contracting authorities to do things in their own way,

13 even in the regime that applied during the pandemic.

14 It's possible to carry out negotiations or to carry out

15 competitive dialogues with a very low threshold of

16 justification, so it's not a very strict system where,

17 for example, you would say, if you want to engage in

18 negotiations, you necessarily have to negotiate with

19 three or with five. In the UK, each contracting

20 authority can come up with its own view on how many

21 economic operators to engage with. And it's also very

22 flexible in that there are no hard constraints on what

23 could be considered, for example, in terms of award

24 criteria. So each contracting authorities decides its

25 own mix of technical and price, and within technical

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1 stifling commercial acumen or the possibility of doing

2 things in a creative way. At the other end you could

3 have very flexible procurement regimes that could be

4 quite complicated and give lots of discretion to the

5 specific officials, but those are seen as creating more

6 difficulties, in particular in controlling the exercise

7 of discretion. So there's this spectrum of rigidity

8 versus discretion-based, and each country makes its own

9 choices.

10 Now, there are trade-offs in both of them. I think

11 if we are really worried about corruption, we want to

12 tend towards rigidity, because then we can control each

13 process and each part of the process. If we are more

14 worried about value for money, we probably want to

15 create more flexibility and more discretion.

16 Now, the other trade-off is on the complexity of the

17 system and the underlying infrastructure that we want to

18 run the system. The more rigid the system, the less

19 demanding it is on the procurement workforce. The more

20 flexible and discretion based, the more it requires

21 a highly skilled procurement workforce that will be able

22 to exercise that judgement carefully.

23 So those are the choices that need to be made. And

24 then there is also choices about the level of challenge

25 of procurement decisions that is allowed. So if you

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1 what to look at. So I think it tends towards the

2 discretion-based end of the spectrum.

3 **Q.** All right. I think that takes us on to the basics of

4 public procurement regulation. Would you say a few

5 words about that topic, remembering to keep the pace

6 a little bit down.

7 **A.** Yes. So I think, like I said, procurement regulation

8 looks a bit different in each jurisdiction but there is

9 a broad consensus on the main principles of procurement

10 regulation. And those principles, in my view, include

11 the predictability of the system, they include the

12 effectiveness of the system, and by effectiveness I mean

13 that, first and foremost, procurement is a tool for the

14 public sector to obtain the goods or the services that

15 it requires. So the main thing it has to do is deliver

16 on that front.

17 But of course, it has to do it in a way that ensures

18 the economy or value for money. It's not about buying

19 things at any price; it's about having a good balance

20 between what's required and the outlay that it requires.

21 It's also important for it to be transparent and that

22 transparency has to do both with what is disclosed to

23 the public through proactive publications, but also with

24 adequate recordkeeping, so it's a principle that every

25 decision has to be traceable and there has to be

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1 a record, so that can be scrutinised, and transparency
2 is an enabler for accountability.

3 It's also very clear that procurement has to ensure
4 integrity, and that will require preventing corruption,
5 preventing conflicts of interest, and preventing
6 collusion, which are three different ways in which the
7 procedure could be tilted or not lead to a level playing
8 field. And I could expand on any of those if they are
9 of interest.
10 **Q.** What I'd like to ask you is that these principles or
11 these regulatory principles, are they applicable both in
12 business as usual or normal forms of procurement as well
13 as in emergency situations, to which we will turn in
14 a few moments?

15 **A.** So the key principles are applicable throughout. What's
16 going to happen is that in emergencies the balance
17 between the principles might shift. So it's well
18 understood that, for example, effectiveness and value
19 for money may not always be maximised. There will be
20 times, and I'm sure we will come to it, where the market
21 is such that probably you cannot get things at the price
22 you would want, and you still need to get the things, so
23 you need to facilitate effectiveness over value for
24 money, but that doesn't mean value for money goes
25 completely out of the window. The way that I phrased it

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1 to market. But transparency has to be there.

2 And I think what is important to recognise in
3 emergency situations is that while things can be done in
4 a different way by shortening processes or dispensing
5 with some phases, the fundamentals remain the same.

6 **Q.** All right. Let's move on. I think we'll come back to
7 those when we reach the specifics of emergency
8 procurement in a few moments. Before that, I just want
9 to ask you about thresholds or the scope and modes of
10 application of public procurement regulation. Would you
11 provide the Inquiry with your reflections on that topic,
12 please?

13 **A.** Yes. So we said procurement rules apply whenever the
14 public sector buys something but they don't apply to any
15 part of the public sector buying anything for any value.
16 They are tiered to ensure that proportionality that we
17 are talking about. So procurement rules will apply to
18 most of the entities in the public sector and, for the
19 purpose of the report, all Covid-related procurement was
20 covered because it was carried out either by central
21 governments, or the central government of a devolved
22 imagination, or by a hospital which is funded by
23 a public authority.

24 **Q.** When you say "tiered", do you mean by spend?

25 **A.** By spend is the main way of making the obligations

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1 in the report is that in normal times value for money is
2 about maximising the value for the taxpayers' funds.

3 In my view, in emergency times value for money is
4 about minimising the excessive prices that are being
5 paid, minimising the risk of waste of taxpayers' funds,
6 so what these principles look like or the way they are
7 implemented may shift, but the principles apply
8 throughout.

9 **Q.** Is that true for all of the principles? Are there any
10 that would apply in any event, whether it's emergency
11 procurement or business as usual procurement?

12 **A.** So the ones that apply in any event have to be
13 transparency for sure, and they have to be
14 accountability for sure. Those two, basically, without
15 them you cannot achieve even the anti-corruption goal of
16 procurement rules. So those definitely have to apply --

17 **Q.** Do they apply in the same way in emergency procurement
18 or in a different way?

19 **A.** They apply in a different way because there's also
20 an implicit principle of proportionality. So what would
21 be disproportionate would be, for example, in
22 an emergency to require long lead times and to ensure
23 that transparency is out there for everyone to look at
24 before things happen because it can be that transparency
25 has to come after the fact, when you're really rushing

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1 proportionate, so the procurement rules establish
2 different value thresholds above which full compliance
3 is required and then --

4 **Q.** What's the value threshold for central government?

5 **A.** So the value threshold for central government is about
6 £140,000 for goods and services, and for regional local
7 government -- but that would not cover devolved
8 administration, because devolved administration is
9 central government, for these purposes -- at regional
10 local government it would be about £215,000 at the time.

11 **Q.** So it's a higher threshold?

12 **A.** It's a relatively high threshold because it requires
13 compliance, for example, with international advertising
14 of opportunities, it requires compliance with the
15 periods of time that we will discuss later. So below
16 those thresholds, it is understood that it would be
17 disproportionate to impose full compliance with those
18 requirements.

19 **Q.** Finally on this topic, how is oversight achieved in
20 relation to this?

21 **A.** So oversight is achieved in two ways. There are, in
22 each system, a mechanism of oversight through
23 audit-based mechanisms, in the UK. It is well known
24 that it is done for the English jurisdiction by the NAO
25 and in each devolved administration by the equivalent

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1 audit offices. And then there is the possibility of
2 judicial review and activity remedies under the
3 procurement rules to challenge procurement decisions.

4 So the way I understand it is that oversight more in
5 the public interest is carried out as a matter of course
6 through these audit-based mechanisms, and challenge is
7 based more on the private interest of those tendering
8 for contracts is carried out down the judicial route but
9 there are different models and the observation that
10 I make in the report, and it will be important later, is
11 that the mechanisms of oversight, but particularly of
12 challenge in the UK, have not been as robust as would be
13 desirable, and that's one weakness of the system
14 throughout the period covered by the report.

15 **Q.** We will come on to a couple of those legal challenges in
16 due course, both of them brought by the Good Law
17 Project. Before that, I'd just like to understand from
18 you the time frames that we can assume occur in
19 'business as usual' procurement exercises.

20 **A.** So in business as usual procurement, contracting
21 themselves have an obligation to advertise for
22 a relatively long period of time and it depends on
23 whether they are running single stage or two-stage
24 procedures. So if they are engaging in single-stage
25 procedures, so what would be called the open procedure,

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1 create what are called framework agreements or Dynamic
2 Purchasing Systems, which are ready made route to market
3 or commercial vehicles that means that they do the
4 design and the advertising and the evaluation and
5 preliminary award or preliminary inclusion into the
6 Dynamic Purchasing System, so that when a contracting
7 authority, say an NHS trust, wants to buy gowns, they
8 can simply look at what framework or Dynamic Purchasing
9 System has been put in place by NHS Supply Chain, for
10 example, or the Crown Commercial Service, if they're
11 buying something else and then simply run a mini
12 competition, which is much quicker and it could be
13 a matter of couple of weeks.

14 So I think that it's not untrue that it takes nine
15 to ten months to buy gowns but I think it's also true at
16 the same time that, if the right framework is in place,
17 it could take certainly under a month, maybe a couple of
18 weeks.

19 **Q.** I wanted to ask you: what are the other methods of
20 accelerating procurement, short of direct awards, to
21 which we'll turn in a moment?

22 **A.** So the procurement rules already have embedded the
23 understanding that things cannot always go according to
24 the ideal plan, so when a contracting authority faces
25 an urgent requirement, not an extremely urgent one but

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1 they would have to advertise for about -- adding the
2 substantive period, about 35 days, and if they are in
3 two-stage procedures, that goes longer. But that's the
4 minimum legal requirement. In any case, in practice,
5 what the statistics show is that it can take more months
6 for the completion of a procurement exercise. I think
7 the average is in excess of 90 days. Of course, there
8 would be quicker and longer periods involved in those
9 statistics.

10 **Q.** In a previous module, Module 3, Sir Christopher Wormald
11 was asked about the procurement of gowns and, in that
12 case, he said that a period of -- I think it was either
13 9 or 11 months was quite normal. Is that your
14 experience?

15 **A.** So I think what we need to distinguish is what will be
16 a one-off procurement and what are called commercial
17 vehicles for procurement. So I think that's quite
18 important to bring in. So if a contracting authority
19 tries to buy of its own from scratch anything, be it
20 gowns or any other material, they have to run through
21 the process of designing it, advertising it, running the
22 competition, awarding. Nine months doesn't seem out of
23 the norm but that's not the only or even the quicker way
24 that they usually can do that.

25 There are specialised central purchasing bodies that

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1 an urgent one, they can engage in what's called
2 accelerated procurement, which means that they can
3 significantly shorten the period of time that will be
4 required to advertise and to award contracts. And that,
5 in short, cuts it to half the length of the period in
6 ordinary times.

7 If you're interested in the detail, I can also give
8 it to you, I think it's reflected in Table 3 of my
9 report --

10 **Q.** There is where you set out the time periods.

11 **A.** So in that table 3, which is page 27, the time periods
12 show that, when the requirement is urgent, the
13 advertising goes down to a total of 25 days for open
14 procedures or 35 days.

15 **Q.** I just want to pause for a moment and see if we can get
16 that up on the screen it's INQ -- ah, you've beaten me
17 to it. So this is -- we have now the table that you're
18 speaking to.

19 **A.** Yes.

20 **Q.** Can you see that, Professor?

21 **A.** Yes.

22 **Q.** I'm sorry to ask you to do this but do you just want to
23 go back to what you were saying and say it again by
24 reference to this table?

25 **A.** Yes. In this table the standard times for ordinary

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1 procurement are displayed on the first row, which talks
2 about the default timescale, and those are the 45 days
3 for an open procedure or 70 days for a restricted
4 procedure. If you use an electronic procurement
5 platform, which is the usual way of doing things these
6 days, it gets reduced by five days, so it's 40 or 65
7 days, and that would have led to those basically three
8 months in practice of a standard procurement exercise.

9 But if the need is urgent and it would not be
10 possible to comply with those more extended timelines,
11 then it's possible to cut it down, basically, by half
12 and, if it's a one-shot open procedure, the advertising
13 will have to be open for 25 days. If it was a two-stage
14 procedure then it's a 10 plus -- 15 plus 10 days, so
15 it's 35 days, a restricted procedure or a competitive
16 procedure with negotiations.

17 **Q.** So this deals with urgent and extremely urgent
18 procurement?

19 **A.** But that's different. So the difference between urgent
20 and extremely urgent is that urgency is a low threshold
21 to cross. It's simply the contracting authority
22 realises it needs something quickly and it can simply
23 shorten -- it's not strictly a matter of convenience but
24 it doesn't have to provide very detailed reasons why
25 they are doing things in an accelerated way but when

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1 **A.** That's correct.

2 **Q.** We're going to come on to it but, since it's arisen now,
3 is that position changed under the new legislation?

4 **A.** So the position has changed under the new legislation in
5 that, under section 42 of the Procurement Act 2023, it
6 is possible for a minister, by regulations, to authorise
7 on that blanket approach for a specified period of time
8 the resort to direct awards without having to engage in
9 an award-by-award analysis of whether the rules for
10 extremely urgent procurement apply or not.

11 **Q.** All right. I just want to understand also from you,
12 you've made it clear that the circumstances of the
13 pandemic were such that it was clear that Regulation 32
14 would apply albeit on a case-by-case basis. How rare is
15 the use of Regulation 32 more generally?

16 **A.** More generally it's very rare. And I think that is
17 borne out by the statistics. I mean, there's no great
18 quality procurement data, and I'm sure we'll come back
19 to that, but before the pandemic, it was extremely rare.
20 You could almost count them with the fingers on one hand
21 in any given year how many times you would have an
22 extremely urgent procurement, and I think that's
23 probably for two reasons, why -- and one is the test is
24 very stringent, so this need to demonstrate a genuinely
25 unforeseeable situation is a high threshold to cross,

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1 things are extremely urgent, and this is a defined test,
2 this has to be something that a diligent contracting
3 authority couldn't have foreseen, that it's beyond its
4 control, it didn't do anything to contribute to that
5 extreme urgency, and it would not be possible to even
6 comply with those shortened timelines, in that case
7 that's when we open the possibility of what you refer to
8 as direct awards, and those can take place without any
9 minimum time period. So it could be a matter of hours.

10 **Q.** There is no doubt, is there, Professor, that the
11 pandemic itself is an example of where Regulation 32,
12 direct awards, or extreme urgency did apply?

13 **A.** There is no question. But there is also no question
14 that it didn't apply throughout the pandemic in the same
15 way, and it didn't necessarily apply to any type of
16 procurement. You still had to comply with the specific
17 requirements for the award of each specific contract.

18 **Q.** So, just to understand, unpack what you've just said,
19 it's not possible, at least under the old regime, pre
20 the Act that came in last week, to issue a blanket
21 Regulation 32 treatment of all types of procurement; is
22 that right?

23 **A.** That's --

24 **Q.** Each individual act of procurement must be justified by
25 reference to Regulation 32?

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1 but the second one is that there are loads of frameworks
2 in place, so when some contracting authority needs
3 something really, really quickly, they could probably
4 find a framework they could draw from.

5 **Q.** All right. Could you tell us a little about the risks
6 inherent in emergency or very urgent procurement and how
7 to mitigate them.

8 **A.** So the main risk in extremely urgent procurement is that
9 things are done at speed, and there's no significant
10 planning. There's also no significant engagement with
11 the market; it's a matter of a contracting authority
12 finding someone that can provide what's required in the
13 very short-term.

14 So there's of course a challenge from
15 a value-for-money perspective in how things are done.
16 Competition is deactivated, so we cannot trust that the
17 conditions given by whoever is approached are going to
18 be reflective of the market. And also whoever is
19 approached knows that the contracting authority has an
20 urgency and therefore probably a higher risk appetite,
21 to put it in those terms.

22 But the second challenge is that it's a free choice
23 of who to approach, and therefore corruption becomes
24 a significant issue to consider, because in having that
25 free choice, and only having to provide transparency

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1 after the fact, it could be that the contracting
 2 authority is guided by considerations that are not
 3 permissible in other times.

4 **Q.** It may be obvious, but just to put the matter beyond any
 5 doubt, where one is not engaging in direct awards, how
 6 is that risk of corruption or abuse minimised?

7 **A.** So when one does not engage in direct awards, the first
 8 thing a contracting authority has to do is publish
 9 a contract notice, which basically indicates they have
 10 an intention to award the contract, they have to
 11 describe what that contract looks like, and they will
 12 have a call for competition of different sorts.

13 And that will allow the market to be warned about
 14 what's going to happen, and to look at those decisions.
 15 For example, they could challenge the specific procedure
 16 that wants to be used or they could challenge specific
 17 requirements if they think that that steers the contract
 18 in favour of specific potential providers. That's one
 19 way of trying to minimise the risks of corruption.

20 The other one is, of course, that contract is going
 21 to be a matter of record. So, looking at oversight, it
 22 could be that the contract is going to be picked up
 23 later, and knowing that somebody could look into it is
 24 also a good deterrent for corruption. Whereas when one
 25 is engaging in direct awards, there is no transparency

25

1 contractual mechanisms in place. They have pre-defined
 2 suppliers with pre-agreed terms for those supplies or
 3 works that they would require.

4 **Q.** Thank you, Professor.

5 Let's move on, if we may, to public procurement
 6 legislation and guidance within the UK.

7 Your report sets out the provisions that apply
 8 across the devolved administrations so far as primary
 9 legislation is concerned, and you deal also with
 10 secondary legislation and so-called PPNs. Does that
 11 legislation differ to any great degree across the
 12 devolved administrations?

13 **A.** So up until last week, so in the regime applicable
 14 during the pandemic, there was no significant
 15 difference, from a substantive perspective, across the
 16 four nations.

17 In the UK there are two -- or there were at the time
 18 two fundamentally distinct sets of legislation: one for
 19 England, Wales and Northern Ireland, another one for
 20 Scotland. They were two separate transpositions of the
 21 European directives, but they were fundamentally
 22 equivalent. And in the report I have highlighted where
 23 there is different wording, but that's the exception;
 24 most provisions are exactly worded and they are also
 25 very closely tracking the European directive.

27

1 before the contract is awarded and, as we will see
 2 later, there is also no guaranteed transparency once
 3 a contract is awarded. So that contract can live in
 4 some sort of vacuum and in that way be shielded from
 5 oversight or from challenge, and that breeds risks of
 6 corruption and that's why we have rules to try to
 7 minimise that.

8 **Q.** What about contingency arrangements in the UK and, to
 9 the extent that you're able to comment, abroad to
 10 address or mitigate these risks in advance? Was any of
 11 that done?

12 **A.** So some of that was done, both in the UK and in other
 13 places, through what's called, maybe, "just-in-time"
 14 contracts or through this, more broadly, framework
 15 agreements. I think the international guidance is clear
 16 that you should try to avoid finding yourself in
 17 a position where you're going to be extremely urgently
 18 awarding contracts, and that's why you want to have
 19 either contracts with a standby clause or with some sort
 20 of suspension condition or you want to have framework
 21 agreements that you could draw from at the time of need.
 22 And this is, for example, how emergency response
 23 agencies operate. They know they will have to deal with
 24 some emergencies somewhere some time and they are not
 25 going to wait for that emergency to come up to put the

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1 **Q.** What about competitive procurement in UK law and policy?

2 **A.** So what's clear under the regime is that the starting
 3 point is procurement has to be competitive, and
 4 contracting authorities will have a choice of different
 5 procedures. They had a free choice between open,
 6 one-shot procurement or restricted procurement, which
 7 was a two-stage process whereby any company could
 8 express interest in participating in the second stage
 9 and then, thorough shortlisting, some would be invited
 10 to that, and that's how we expect procurement to be
 11 carried out.

12 But, at the same time, as I said before, there was
 13 flexibility in that when the grounds in Regulation 26
 14 were met, it was possible to engage in other more
 15 flexible procedures, fundamentally allowing for
 16 negotiations or allowing for competitive technical
 17 dialogue. And what a contracting authority had to do in
 18 those ordinary times is choose the procedure that was
 19 more suited to the specific needs, so if they were
 20 buying something very complicated and very innovative,
 21 they probably wanted to go down the route of, say,
 22 a competitive dialogue or innovation partnership. If
 23 they were buying something extremely commoditised, they
 24 probably wanted to use an open or restricted procedure.

25 But also as I said, and this is a matter of concern

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1 for other reasons but there's also been an increase in
 2 the use of these frameworks in commercial agreements.
 3 It's been seen that contracting authorities don't all
 4 have to be running an open procedure for photocopier
 5 paper, and that's why we have had lots of centralisation
 6 for ordinary times, when Crown Commercial Service or, in
 7 the healthcare sector, NHS Supply Chain have put
 8 together these framework agreements that fundamentally
 9 do 90% of the procurement and all the contracting
 10 authority has to do in ordinary times is call off from
 11 them through a mini competition in the terms of those
 12 frameworks.

13 **Q.** Do we observe that centralisation within the devolved
 14 administrations as well?

15 **A.** Yes, that also happens in the devolved administrations.
 16 I think that the two-tier centralisation for the general
 17 public sector and the healthcare sector that we see in
 18 England is also represented in the other devolved
 19 administrations.

20 **Q.** Now, there then follows within your report quite
 21 a detailed section on the legal and policy framework
 22 focusing on evolving guidance.

23 I'd ask for Summary Box 16 in INQ000539153, it's
 24 page 72, to be displayed, and then ask you to comment on
 25 it. It spans two pages.

29

1 pandemic allowed resort to the direct awards, and both
 2 the UK and the European Union guidance then reminded
 3 public buyers of the requirements that still remain. So
 4 even itself you could, without having to wait for any
 5 specific period of time, directly award contracts, it
 6 was very clearly said that you still had to keep
 7 adequate records, it was clearly said that you still had
 8 to publish transparency notices, it was also very
 9 clearly said that you had, to the extent possible, keep
 10 concern for value for money.

11 Now, in this first wave, I think the main value was
 12 that reminder because it was very clear there was
 13 an extremely urgent need but there was not a lot of
 14 guidance on how to do it, it was just strengthening that
 15 there was a permission to go and be more proactive than
 16 you would be usually, and in that the European
 17 Commission went even further than the UK Government, for
 18 example saying contracting authorities can engage in
 19 market matching exercises or they can deploy people in
 20 other jurisdictions trying to find things. So it was
 21 very much a facilitative first wave of guidance.

22 **Q.** Would you have expected that guidance to have existed at
 23 an earlier stage?

24 **A.** It would have been desirable but I think I wouldn't have
 25 expected it because it didn't exist in any jurisdiction

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1 So if we'll start with the first, that would be very
 2 helpful. Would you share your reflections, your
 3 comments on this topic, "Legal and Policy Framework"?

4 **A.** Yes, so the UK approach to creating the legal framework
 5 has been to create legal requirements very sparse or
 6 very minimum, and to develop significant additional
 7 requirements through policy. That policy usually is
 8 encapsulated in Procurement Policy Notes, and those
 9 Procurement Policy Notes address lots of different
 10 issues from net zero, social value and other aspects.

11 In the time of the pandemic -- in the run-up to the
 12 pandemic there was no guidance on emergency procurement
 13 because this was a rare event and also because, whenever
 14 rare emergency procurement happened, it was in a very
 15 discrete and contained setting.

16 So the first thing that the UK Government did, but
 17 also the European Commission did and then the Scottish
 18 Government also replicated, is to issue guidance on how
 19 to approach emergency procurement at an unprecedented
 20 scale, and that's what I have termed here as a sort of
 21 "first wave of guidance" in March and April 2020.

22 And what this guidance did is clarify that that
 23 case-by-case analysis that we referred to for the use of
 24 extremely urgent procurement didn't have to be a very
 25 cumbersome exercise because it was recognised that the

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1 that I'm aware of because we had not been engaging in
 2 extremely urgent procurement at this scale.

3 **Q.** So Regulation 32, you made clear earlier, is a rare
 4 thing; presumably its equivalents abroad equally rare?

5 **A.** Yes.

6 **Q.** You mention that the system in the United Kingdom allows
 7 a high degree of discretion but, under Regulation 32
 8 conditions, a very high degree of discretion; is that
 9 fair?

10 **A.** Yes, I think it's almost an unlimited degree of
 11 discretion, provided that the basics are complied with.
 12 So due diligence has to be in place, adequate
 13 recordkeeping has to be in place, transparency has to be
 14 in place and value for money complied with to the extent
 15 possible. Other than that, there's full discretion for
 16 the contracting authority to go out and get whatever is
 17 needed at the time.

18 **Q.** When you touched on that balance between rigidity and
 19 discretion in 'business as usual' procurement, you
 20 referred also to the need for adequate staffing or the
 21 professionalism of those involved in procurement. What
 22 is the position in the UK in 'business as usual'
 23 circumstances and was the position during the Covid
 24 pandemic, so far as that matter is concerned?

25 **A.** So in terms of staffing, I think in business as usual,

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1 the contracting authority can gauge to what extent it's
2 capable of running the more discretion-based complicated
3 procurement or not. So, for example, if they don't have
4 a very strong procurement team, they will not be running
5 innovation partnerships, which are notoriously very
6 complex, but it's self-selected or there's an adjustment
7 between the capability and the complexity.

8 When we are in an emergency situation, it's not
9 an option. It's going to be complicated procurement,
10 it's going to be messy, if I can put it in those terms.
11 You need to have that capacity and, even if you don't
12 have it, you have to try to do as best as you can. What
13 I think is complicated in that context is to try to
14 think about how to ensure the capacity is there for when
15 you need it, and that's also another theme that I'm sure
16 is going to come up later on.

17 But what you would want to do is look at where
18 capacity lies, and put those highly skilled people doing
19 the procurement, you don't just and to bring anyone and
20 then tell them, "Now, go and buy this very complicated
21 thing in this very messy environment", in particular you
22 don't want to put anyone that is not very familiar with
23 the rules to do that because they would probably not
24 even know that PPN120 exists or what it requires.

25 **Q.** Thank you for that. I've taken you away from the

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1 public interest, that needs reviewing and I think those
2 principles would have been helpful, in allowing
3 particularly contract implementation teams to make
4 follow-up decisions on the rushed initial decisions of
5 extremely urgent procurement.

6 **Q.** So would you make a recommendation in relation to that?

7 **A.** So recommendation I would make is that those principles
8 of responsible behaviour, the requirement of honesty and
9 candour, almost an approach to open book contracting
10 should be the baseline. So it should not be that we
11 treat these transactions as very arm's length, each
12 party trying to get the better bargain they can.
13 I think it's about being a lot more open and
14 collaborative because, in the end, the supplier of the
15 public sector becomes part of the complex organisation
16 of the delivery of public services.

17 **Q.** Let's move on to the third wave, which features at the
18 bottom of the first part of your box 16.

19 **A.** Yes. The third wave in summary was a review of the
20 first wave, and it was fundamentally a review to
21 accommodate the recommendations of the National Audit
22 Office had made. So it was a review that clarified
23 specific points. In my view, it didn't change the
24 content of the first wave guidance, but it presented it
25 in a different way. There were perhaps three main

35

1 display. I think you dealt with first wave guidance.

2 Could I ask you now to move in to second favour
3 guidance.

4 **A.** Yes, so there was a second wave of what guidance had
5 came a little bit later. It would have been guidance
6 not immediately obvious, touching upon emergency
7 procurement, because it was about other things such as
8 transitioning out of support schemes, or how to assess
9 the reactivation of contracts as the pandemic evolved.
10 But I think what is very important in that guidance is
11 that there are very fundamental principles of integrity
12 and responsibility, that are highlighted and that wave
13 of guidance is all about ensuring contractors don't take
14 advantage of the public sector, there is a fair balance
15 of obligations and support, that if contracts have
16 become unnecessary or undeliverable because of the
17 conditions of the pandemic, they need to be revised, and
18 if needed, terminated. I think those are all principles
19 that should have also been applied in relation to the
20 emergency procurements.

21 So if two months after putting a contract in place,
22 it is seen that the contract is no longer necessary,
23 then it needs to be reviewed. If two months after
24 putting it in place it's clear that the contract is
25 significantly disproportionate, particularly against the

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1 points that are salient in that third wave. The first
2 one is that maybe the first wave gave the impression
3 that direct awards are the first thing you should be
4 thinking about if you're in an emergency procurement,
5 whereas in the revision, direct awards are presented as
6 one or more clearly presented as one of the different
7 things that contracting authorities can do. They can
8 modify existing contracts, they can call off from those
9 framework agreements. So whereas in the first wave
10 direct awards were presented top of a list of five
11 options, in the revised they are bottom of the five
12 options.

13 And I think implicitly, this comes to say we need to
14 deprioritise the emphasis on direct awards when we are
15 reacting to an emergency.

16 **Q.** Thank you, Professor. I want to move on and display
17 your box 17, which is same INQ number, 000539153, at
18 page 80. It fits within a single page. It's entitled
19 "Applicability of Key Requirements", and you deal
20 here -- well, do you want to summarise what you are
21 telling us within this summary box?

22 **A.** Yes. So I think, because of the absence of guidance at
23 the beginning of the pandemic and also the way the
24 guidance had appeared, there's been debate and
25 discussion about what requirements actually applied to

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1 procurement during the pandemic. So what I do in that
2 box is summarise and clearly say which I think were the
3 requirements that applied to that procurement. And it's
4 a bit of a long list but it's probably worth going
5 through them.

6 The first one is that there is no question in my
7 mind that there was an obligation to try to secure value
8 for money to the extent that the market conditions
9 permitted. So this is to say that the guidance was
10 clear that contracting authorities had to take whatever
11 steps they could to try to avoid high prices, and when
12 they were not able to do that, they had to keep a record
13 of it so that it could be audited later on.

14 The second requirement is that they had to engage
15 with emergency procurement to the minimum required
16 extent, and this is as a result of the legal requirement
17 that emergency procurement has to be strictly
18 proportionate to the immediate need of the contracting
19 authority.

20 So they could not buy things that were for later.
21 They could not buy things that exceeded the immediate
22 needs, and I think that that assessment of absolute need
23 in the short term was another requirement in all
24 procurement in --

25 **Q.** Was that a common practice here in the UK, in terms of
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1 immediately, and it has to be fundamentally a bridging
2 solution. So an example I would say is, for example, if
3 you have a cut in your kitchen, you can put a band-aid,
4 but you're not going to keep putting band-aids if that
5 doesn't solve the problem, you're going to hospital to
6 get a suture. So direct award is the band-aid, it's not
7 the suture.

8 **Q.** Understood.

9 Let's go back to box 17, please. You've taken us
10 through the first few points.

11 **A.** Yes. So it was also required for contracting
12 authorities to adequately manage risks of poor value for
13 money and the potential risk of maladministration. In
14 this case the maladministration because of buying too
15 much or buying things that were not suitable. So
16 I think what that required is, before entering into any
17 further contract, to revise the existing contractual
18 position and to have updated information on whether that
19 contract has been or is likely to be fulfilled.

20 So, for example, as deliveries started to come in,
21 it would be required to see what stock position we have
22 now, how far do we go, are we still in an extremely
23 urgent position or not.

24 The next requirement is that, linked to that issue
25 of aggregate purchasing, when you have parallel entities
39

1 procurement, to advance buy?

2 **A.** It's not, and I think -- it depends a bit what we mean
3 by advance buy, but when we are trying to put, for
4 example, together a framework agreement on one of those
5 highly commoditised issues for the next four years,
6 maybe that could be thought as advance buying, or at
7 least we are setting the conditions under which we will
8 buy in the future, but there is no firm commitment.

9 So it could be that we put together, for example,
10 a framework for whatever device is the most technically
11 advanced today, but if tomorrow something new comes in,
12 that framework may just go unused because --

13 **Q.** Did it happen much? Sorry, to clarify, did it happen
14 much during the pandemic, advance purchasing?

15 **A.** Yes, during the pandemic there was advance purchasing as
16 far as I can see, because the government was not buying
17 what was required in the next two, four, six weeks; the
18 government was buying what they thought would be
19 required in several months' time, and in my view, that
20 exceeded the limit of this requirement.

21 **Q.** And is it possible to use Regulation 32 when you are
22 buying for a number of months in advance?

23 **A.** No, it's not.

24 The guidance was very clear that Regulation 32 only
25 allows for something that is going to be delivered
38

1 or parallel cells buying the same thing, you need to
2 have a very clear view, in realtime, that they are not,
3 for example, by both entering into a very large contract
4 on the same date, creating excessive purchase. And also
5 you need to make sure that you're not creating lots of
6 costs that are going to come down the line. Because
7 even if having more supply could be seen as desirable in
8 the short term, you need to consider how costly it's
9 going to be to stock it, to keep it, and, eventually, to
10 dispose of it. So I think there's a requirement to look
11 at value for money also in that broader context.

12 **Q.** How is that achieved? Is that a data issue?

13 **A.** That's a data issue and that will require whoever is
14 authorising contracts to have realtime or as close to
15 realtime data on what the specific position is at that
16 moment.

17 **Q.** All right. Thank you. Let's move on within this box.

18 **A.** Then it's also requirement to ensure the quality and the
19 suitability of what you're buying, and that goes to the
20 issue of the requirement of effectiveness.

21 We said procurement first and foremost needs to
22 ensure the public sector gets what it needs when it
23 needs it in the conditions that it needs it. So getting
24 something that is non-compliant is not effective.

25 So they would have had an obligation, to the extent
40

1 possible, to assure that what they were buying was fit
2 for purpose.

3 They would also have had an obligation to ensure
4 that any shortcomings in quality or suitability of the
5 supplies produced were followed up. It would not be
6 possible simply for contracting authorities to receive
7 something that isn't suitable and let that rest. They
8 will have to then look at what can they do under the
9 contract, whether have it replaced, have it reimbursed
10 or do whatever could be done in that situation.

11 I think they also had an obligation constantly to
12 check that that case-by-case analysis was correct.

13 So this is two bullet points down from the one that
14 was highlighted.

15 For every contract they need to ensure that at that
16 moment, the conditions to engage in the extremely urgent
17 procurement apply, they need to keep a clear record of
18 it, and they need to ensure that the position is not
19 changed because of how the other contracts are panning
20 out.

21 So it's not only about, for example, simply looking,
22 "Is the pandemic still going and therefore we can use
23 Regulation 32", but it's more about the detailed
24 analysis of, given everything else we've put in place,
25 do we still need this contract extremely urgently or has

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1 and things like this.

2 They would also have had a constant obligation to
3 guard against conflicts of interest and to document any
4 measures put in place to try to mitigate them, and
5 I guess we can talk more about the extent of that
6 obligation but it was comprehensive obligation.
7 Conflicts of interest are a clear focus of attention in
8 all procurement processes and it's very, very important
9 that there is no -- not only no actual, but no potential
10 conflicts of interest and we can discuss more what that
11 means if that is of interest.

12 **Q.** Do you want to explain what is meant by a conflict of
13 interest in this context?

14 **A.** So a conflict of interest is any circumstance that is
15 going to trigger a biased and non-objective decision in
16 the award of a contract. It could be that there's
17 a conflict of interest for financial reasons, for
18 example if somebody in the contracting authority stands
19 to gain from the contract, or for personal reasons, if
20 there's, for example, any former colleague that stands
21 to gain or a family member or relative or somebody that
22 stands to gain. But also there's conflicts of interest
23 when issues that are not relevant to the procurement are
24 taken into account in making a procurement decision.

25 So for example, if I am awarding a contract to

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1 this become something that is urgent but not extremely
2 urgent and, therefore, we need to move away from direct
3 awards and we need to go to other mechanisms, such as
4 competitive procedure with negotiations, for example.

5 **Q.** Professor, you don't identify a date, do you, when that
6 change should have occurred?

7 **A.** No, I haven't seen information that would allow me to
8 make that call but I think what we can say is, from
9 a matter of principle, is that purchases that we're
10 trying to create a stockpile for the second wave, for
11 after the summer, would not have been covered by
12 authorisation for direct awards because the need was not
13 extremely urgent, it was for later. This most future
14 buying in your terms, and that not permitted under
15 Regulation 32.

16 **Q.** All right. Moving on, if we may?

17 **A.** Then they would also have to ensure that contractual
18 performance is being met on all sorts of things, not
19 only on suitability but also on any other obligations
20 and, in particular, they should not allow any legal
21 contract modifications. In particular, there are
22 illegal contract modifications where the balance of the
23 contract tilts in favour of the supplier, and that's
24 something they should have had to look at, for example,
25 not allowing part performance to trigger full payments,

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1 a specific company because I am worried that otherwise
2 they will go to the press and create public relations
3 problems for me, that is a conflict of interest and it's
4 maybe what is better termed an organisational conflict
5 of interest, rather than a personal conflict of
6 interest, but it's still a relevant conflict of interest
7 that needs to be identified, mitigated or avoided.

8 **Q.** Do you consider whether there was adequate guidance to
9 those involved in those contracting decisions, in
10 relation to conflict of interest?

11 **A.** Yes, there was a specific PPN from 2019, so very recent
12 before the pandemic, and I think that was good guidance.
13 It was quite comprehensive and it also referred back to
14 further materials that could be taken into account, such
15 as NAO documentation from previous down the line, and
16 I also think conflict of interest is so central to the
17 carrying out of procurement that any public official
18 that carries out procurement will know about conflicts
19 of interest. They will have been asked to disclose
20 them, probably if they are civil servants they have
21 broader obligations to disclose potential conflicts of
22 interest. So this is not something that is esoteric or
23 badly understood.

24 **Q.** All right. You've next dealt with recordkeeping, which
25 I think you've touched on sufficiently already.

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1 A. Yes.

2 Q. The last two bullets, is there anything you want to draw
3 out from those before we move on?

4 A. So I think from the second from the bottom, it's very
5 important that there was a very stringent requirement on
6 transparency. So it's not only that recordkeeping had
7 to be kept but there was an obligation to proactively
8 publish transparent notices and basically the short of
9 it was that within 20 days, at least until June 2021,
10 within 20 days from the award of a contract, under this
11 direct award mechanism, the contracting authority had to
12 publish details of the contract and even a redacted
13 version of the contract itself, so there was a stringent
14 requirement for publication but it was -- in my mind,
15 there is no question that that had to be complied with.

16 And the issue that is not so clear in that period is
17 to what extent a contracting authority that is engaging
18 in direct awards has an obligation to keep a minimum of
19 competition where possible. I think there is judicial
20 authority that suggests that, but I think that that is
21 incorrect, and I think that's also judicial authority to
22 the contrary, that says once the use of Regulation 32 is
23 allowed, there is no obligation whatsoever to engage in
24 any sort of comparison or mini competition.

25 Q. All right, Professor, one final topic and one final box
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1 environment.

2 And I think that's the crucial issue because we will
3 not get better emergency procurement in the future by
4 drafting a rule in the legislation or by drafting
5 a policy document that is more detailed. We'll have
6 better emergency procurement in the future, we'll have
7 better data, we'll have better systems if we have a more
8 professionalised identified workforce that can be
9 deployed at scale.

10 Q. Those presumably are recommendations you would make for
11 the future?

12 A. I would make definitely those three recommendations.
13 I think that the way that procurement data is collected
14 and is shared needs revising and I don't think that the
15 Procurement Act goes far enough in that regard, and
16 I can build on that. I don't think that the systems are
17 sufficiently developed and I think 20 years after
18 e-procurement became mandatory, e-procurement is still
19 not the absolute norm and doesn't work seamlessly in the
20 UK as it also doesn't do in other jurisdictions, and
21 I think that the level of training and capability
22 development requires looking at -- not only but also in
23 relation to digital skills, so I think we need
24 a significant upgrade.

25 Having said that, those are all complicated,
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1 before we move on to your assessment, your analysis, of
2 some of the events of the pandemic, so far as
3 procurement is concerned: it's box 18. It's the same
4 INQ number, INQ000539153. It's already up on the
5 screen, at least the first half of it is there. It's
6 your assessment of the applicable legal and policy
7 framework. How did the applicable legal and policy
8 framework stand up to the test of the pandemic?

9 A. So I think the legal and policy framework was adequate
10 in that it foresaw the possibility for extremely urgent
11 awards and it made clear what specific obligations had
12 to be complied with. It's true that we didn't have
13 guidance before the pandemic but it's also true that
14 guidance was produced relatively early on in the
15 pandemic and, in that regard, I think the guidance was
16 helpful and implementable.

17 What I think is perhaps the most important point
18 I tried to make in that box is the one that crosses over
19 to the next page at the top, which that the issues that
20 have arisen and that are the object of this module are
21 not triggered by having incorrect rules or insufficient
22 policy: the issues are about staffing. The issues are
23 about decision making. The issues are about what
24 information is available, what data is available at the
25 point of making difficult decisions in a messy
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1 expensive to deliver mechanisms. So it's also not
2 a matter of recommending something that's going to be
3 a magic bullet. Some of these things are just
4 incremental and will take time to develop.

5 Q. I will ask you to come on to that in a moment when we
6 come to the next stage in your evidence, so to speak.
7 Is there anything else you wish to say in relation to
8 how the UK and its applicable legal and policy framework
9 stood up to the challenge of the pandemic?

10 A. So I think the other important thing to say, which is
11 further down the line in that box, is that one of the
12 things that can help when you have a systemic emergency
13 is to have a centralised mechanism to react to it and to
14 have an entity that has the capability and has the
15 expertise to try to go to market in those difficult
16 circumstances.

17 In other countries, that centralisation had to be
18 put in place when the pandemic hit but, in the UK,
19 I would have thought the position was strong going into
20 the pandemic because we had specialised entities for
21 centralised procurement, for the healthcare centre in
22 each of the devolved nations and, in particular, NHS
23 Supply Chain had been put in place two years or three
24 years before the pandemic hit as an entity tasked
25 explicitly with creating framework agreements and
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1 commercial vehicles for healthcare supplies.

2 So I would have expected this was the centre of
3 expertise, that this would have the staff with the
4 knowledge to be able to deal with the pandemic when it
5 hit. And I think the events have shown that NHS Supply
6 Chain, in particular, collapsed really early on in the
7 pandemic, and I think that that, to me, was quite
8 surprising. I wouldn't have expected a £250 million
9 organisation tasked only with buying consumables for the
10 healthcare sector to just fundamentally be unable to
11 cope with the increase in demand, even if it was
12 unforeseen.

13 I also would not have expected that that
14 organisation could not be strengthened, and we would
15 rather have to create completely separate organisational
16 arrangements, rather than growing it or developing it.

17 **Q.** But, again, those aren't observations that relate to the
18 robustness or adequacy of applicable legal and policy
19 framework; they are observations that you make about the
20 systemic or structural failures; is that right?

21 **A.** No, I think they have to do with policy, because the
22 policy for the healthcare sector had been to centralise.
23 The policy for the healthcare sector had been to
24 resource this organisation. So in terms of policy, you
25 would have expected that, if there is a healthcare

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1 example, that PPE procurement has been brought back
2 in-house within NHS Supply Chain, because that's all
3 that's been said.

4 I would need to know how many people, with which
5 resources, what sort of stress testing they are
6 conducting. I would need to know how they are trying to
7 ensure security of supply, how they are trying to engage
8 in diversification from markets other than China and
9 other Far Eastern countries.

10 So there is a lot that would need to be done to
11 check that what we have been told has been done has been
12 done in the way that is correct.

13 So this is just to say, just because my
14 recommendations we -- fundamentally let's do Boardman
15 with a couple of more things, that doesn't mean that
16 those are irrelevant, because I'm not sure that we are
17 far enough in the process of those references.

18 **Q.** Thank you, Professor.

19 I want now -- with all of that background, you were
20 starting to touch on particular features of the pandemic
21 so far as it relates to procurement in the UK in your
22 last remarks, but I want to turn now more directly to
23 two topics that you have explored through your
24 consideration of some of the witness evidence that has
25 been obtained by the Inquiry. You considered, did you

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1 crisis we would not expect everyone in the healthcare
2 sector to have had to start figuring out, we would have
3 had a single point of focus. So it's not a matter of
4 the failures that followed; it was a matter of the
5 policy choices the UK had made.

6 And I think NHS Supply Chain was also heavily
7 involved with the management of stockpiles, for example.
8 So it should have been an organisation from a policy
9 perspective expected to own the response and expected to
10 guide the response, and this is a matter of the
11 arrangements in place, it's not a matter of how they
12 didn't work afterwards.

13 **Q.** So what concrete recommendations would you make to avoid
14 a repeat of that set of circumstances?

15 **A.** So I think the recommendations tie closely with what the
16 Boardman -- the second Boardman Review has said, and
17 which this Inquiry has been told has happened, which is
18 that a significant review of how NHS Supply Chain
19 operates was required, and that a change of working
20 processes, a change of IT systems, a change of how many
21 layers of subcontracting exist in the NHS Supply Chain
22 had to be taken a close look. Unfortunately, on the
23 basis of the public information, I cannot come to a view
24 as to whether that has been done properly or
25 sufficiently, because I don't know what it means, for

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1 not, a number of those witness statements that were
2 provided to you from material providers?

3 **A.** Yes.

4 **Q.** Particularly DHSC, Cabinet Office, witness evidence, and
5 other evidence; is that right?

6 **A.** Yes, they are listed in annex 2 of my report, yes.

7 **Q.** You have an annex in which you list the material that
8 you looked at.

9 **A.** Yes.

10 **Q.** And you have sections within your report that deal
11 essentially with two matters that arise out of that
12 evidence. Firstly, the PPE Parallel Supply Chain,
13 including the VIP Lane?

14 **A.** Yes.

15 **Q.** And secondly, the Ventilator Challenge?

16 **A.** Correct.

17 **Q.** And you have considered both of those matters, and you
18 offered your reflections in a quite detailed set of
19 sections within your report.

20 **A.** Yes.

21 **Q.** Yes. And that's what I want to move on to now. I want
22 to hear your response to that evidence.

23 We will of course be hearing from some of the
24 authors of those witness statements in due course.

25 **LADY HALLETT:** Would you rather take the break now, Mr Wald?

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1 It's up to you.
2 **MR WALD:** It may well be convenient, my Lady, if that would
3 suit you, yes.

4 **LADY HALLETT:** I was just thinking the stenographer has
5 probably had quite a morning.

6 **MR WALD:** I'm sure that would be welcome, yes.

7 **LADY HALLETT:** Very well. I shall return at 11.25.

8 (11.09 am)

9 (A short break)

10 (11.25 am)

11 **LADY HALLETT:** Mr Wald.

12 **MR WALD:** Thank you, my Lady. Just before we paused,
13 Professor Sanchez-Graells referred to an annex at the
14 back of his report detailing or listing the statements
15 which he considered in the course of assessing those two
16 or three subject matters, the PPE Parallel Supply Chain,
17 the VIP Lane, as part of it, and the Ventilator
18 Challenge. I wonder if we could just have that annex,
19 it's annex 2, put up on screen.

20 Is that the annex to which you were referring,
21 Professor?

22 **A.** Yes, that's the annex.

23 **Q.** You have read and consider all of those statements for
24 this purpose, have you?

25 **A.** Yes, I have.

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1 the Department instructing SCCL to significantly ramp up
2 the procurement of PPE at the beginning of the pandemic,
3 in short, SCCL was unable to do that. They were
4 overwhelmed by the amount of PPE that was required, they
5 had significant supply chain disruption in that some of
6 the providers of the frameworks they had in place could
7 not come through and could not fulfil orders, and they
8 also were not able to accommodate a significant increase
9 in their workforce. The way it's presented is
10 fundamentally because of IT constraints, so the IT
11 systems that they used could not grow to the number of
12 users that would have been required.

13 So when the collapse of NHS Supply Chain became
14 obvious, the Department decide to step in, and they
15 decided to step in by creating this Parallel Supply
16 Chain, fundamentally for PPE.

17 **Q.** When you say the Department, you mean --

18 **A.** By Department, I mean the Department of Health and
19 Social Care.

20 **Q.** Yes, fine.

21 **A.** It also is important to say that, although this was
22 owned and led by DHSC, the implementation of the
23 Parallel Supply Chain was done by Cabinet Office in
24 significant ways. So it's very much, in my view,
25 a joint endeavour, even if the final formal

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1 **Q.** We can see that they come from various sources and, of
2 course, across the devolved administrations and then we
3 can see that it goes on to a second page and equally the
4 same applies to those listed in the second page?

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

6 **Q.** All right. Thank you very much, Professor. Can I then
7 ask you to turn to page 120 of your report, it's Box 19
8 of INQ000539153, again. This where we have the benefit
9 of your reflections, having considered that evidence,
10 first of all so far as it relates to the PPE Parallel
11 Supply Chain including the VIP Lane, I want to start off
12 with that?

13 Let's take this slowly, it's detailed stuff, and
14 I would ask you to use the box in order to provide your
15 oral evidence now, please.

16 **A.** Thank you. So, as we were saying, before the pandemic,
17 there was a centralised mechanism for the procurement
18 for the healthcare sector in the UK, which was the NHS
19 Supply Chain. The NHS Supply Chain was fundamentally
20 run out of an entity that's called SCCL, which was
21 an arm's-length company owned by the Department of
22 Health at the time, so that's what SCCL refers to in the
23 box and what I will refer to. So NHS Supply Chain or
24 SCCL mean the same thing for these purposes.

25 And what is clear in the evidence is that, despite

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1 responsibility for it lay with the Department of Health.

2 And this Parallel Supply Chain tried to reach
3 different alternative providers for PPE, so one of the
4 things that they did is, of course, continue engagement
5 with existing providers to the NHS Supply Chain, but
6 then they were trying to find new providers for PPE.
7 They were also trying to more focusedly buy PPE from
8 China, specifically, so they organised their activities
9 according to the type of provider that they were seeking
10 to tap into.

11 And the important change of policy at that point in
12 time is that, up to the point of the creation of the
13 Parallel Supply Chain, each NHS trust could decide to
14 buy PPE on their own or buy it collaboratively with
15 other NHS trusts or buy it through the NHS Supply Chain.
16 So it emerged that we were in situation where there was
17 also competition between buyers to try to get into the
18 same sources. So at some point it was decided this
19 Parallel Supply Chain for PPE would be the only buyer of
20 PPE for the healthcare system.

21 So it created this single point of procurement.

22 **Q.** Presumably, your view is that that was a sensible move?

23 **A.** That was a sensible move because you don't want
24 different parts of the same system trying to outbid each
25 other in trying to get the same procurement, and it would

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1 also have been something relatively natural to do, given
2 that PPE had already -- and, like, every other
3 healthcare procurement had already been progressively
4 centralised, so it would not have been a massive
5 departure from how things were done so it should have
6 been relatively attainable, I think, in terms of policy
7 and approach.

8 **Q.** All right.

9 **A.** Now, the way that the Parallel Supply Chain was
10 structured was in part built from scratch, but in part
11 it absorbed the team that was trying to buy PPE for NHS
12 Supply Chain within SCCL. And what in my report
13 I identify is that, in my view, there is not joined up
14 understanding of the interaction between the SCCL PPE
15 team and the new organisation being put together.

16 In the accounts I have read, SCCL comes to say they
17 ceased having responsibility for PPE procurement the
18 moment that the Department of Health stepped in, and all
19 that happened is that some of the subcontractors of
20 SCCL, the so-called category tower service providers
21 loaned some stuff to the new cell and the systems were
22 used to facilitate some awards within frameworks which
23 would be, in my view, a very distanced and arm's-length
24 understanding of the role during the pandemic, whereas
25 in the accounts from Cabinet Office and the Department

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1 "These are the existing suppliers, these are the
2 existing products that we know. Have conversations with
3 them about how far they can go". I think that's easier
4 to delegate to someone than to keep all of that
5 expertise in one silo and then try to bring people that
6 will then have to learn which suppliers exist, what
7 products are bought, what those products look like and
8 have any historical understanding of these things.

9 So one thing that might have been done differently
10 is not to keep the teams so separated, but to have the
11 experts from SCCL support the PPE Buy Cell more broadly.

12 The other thing is that the way this is presented,
13 the new organisation grew very, very quickly. So at its
14 peak I think it had 508 members of staff, so there was
15 a lot of people trying to buy PPE.

16 Of those staff, about 50 were coming from Cabinet
17 Office, from different bits of Cabinet Office, other
18 members of staff were coming from other government
19 departments or were coming from NHS England or NHS
20 Improvement but there was also significant reliance on
21 external consultants. So the make-up of those two parts
22 of the Parallel Supply Chain, the SCCL sort of existing
23 team expect to be highly skilled and knowledgeable, was
24 very different from the make-up of staff in the rest of
25 the Parallel Supply Chain.

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1 of Health, it's the opposite.

2 It's basically said the SCCL team was taken as was,
3 and, yes, was formally included under the new
4 organisation but they were tasked with independently
5 trying to continue procuring from the known providers
6 and they were tasked with exploring with those providers
7 and their market knowledge which other providers could
8 be identified within that remit, but they functioned
9 fundamentally independently.

10 So I think that's a first point of reflection: how
11 joined up the existing structure and the new structure
12 were, and also could it have been done differently?
13 Because I would have imagined that, once the SCCL team
14 is embedded in the brother organisation, their expertise
15 could have been spread more widely. Rather than keeping
16 it as an independent team, they could have kept some of
17 that team and brought new workforce to the tasks that
18 could be easy to delegate but then use some of that
19 expertise to support the new bits of the new
20 organisation.

21 **Q.** Could that have been done without unduly reducing the
22 staff that were made available?

23 **A.** So I think, to me, it's not number of numbers. It's
24 a matter of the expertise because it's probably easier
25 for someone that doesn't know much to be brought to say,

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1 Despite this not being as integrated as it could
2 have been, maybe, the accounts are that the procurement
3 outcomes that were being achieved through these two
4 tracks within the PPE Buy Cell were aggregated, so that
5 on the daily dashboard that was being circulated, the
6 procurement from SCCL was featured so when the rest of
7 the PPE Buy Cell was buying, they were doing it in the
8 knowledge of what could be provided by existing
9 suppliers.

10 And the amounts came to be almost 50/50. So looking
11 at the numbers, and there's a bit of discrepancy in the
12 numbers provided to the Inquiry, but looking at the
13 numbers provided by the Department of Health, it would
14 look like the SCCL PPE team managed to buy about
15 4.2 billion of PPE in the relevant period, then it goes
16 up to 5.2 billion in the extended periods, out of the
17 8.6 billion that the PPE Buy Cell procured in total, so
18 they managed to do about 50% of it.

19 So to me, that also makes it a little bit difficult
20 to understand what did they mean by collapse of the
21 supply chain in the early stages of the pandemic and, if
22 that supply chain had collapsed, how could it still
23 deliver 4.2 billion of PPE?

24 So I think there's issues of timing of decisions and
25 timing of reaction from the markets that to me have been

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1 very difficult to understand on the basis of the
2 accounts, and that might be an issue the Inquiry might
3 be able to go further than I have been. But this is to
4 say the SCCL procurement of PPE was not insignificant,
5 it was not minor. It was very large.

6 Now, moving on to how the new bit of the
7 organisation, the PPE Buy Cell, was organised. It was
8 created on 21 March 2020, and it was initially comprised
9 by a very small group of senior civil servants that then
10 grew up to that very significant organisation of 500
11 staff. And the way it sought to organise itself was
12 through the sequence of procurement that I think you
13 also described yesterday in your opening submissions.
14 They understood that the team would work on the basis of
15 receiving and screening for opportunities, engaging with
16 technical assurance, and then closing or setting the
17 commercial deals.

18 So it's described as a very linear process and it's
19 also described as a very segmented process, in that each
20 of those tasks would be carried out by a different team,
21 and that would be very important when we come to the VIP
22 Lane.

23 Now, this structuring was always meant to create
24 a closing package that would be sent to the Department
25 of Health for final approval and award. Now, this is

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1 of those deals. At least that's the way it's described
2 in the submissions.

3 **Q.** Did it bring advantages, this change in procedure?

4 **A.** So I think it probably would have brought some
5 advantages in that it would have avoided single decision
6 makers and the significant pressure making very high
7 stakes decisions. It should have created a space where
8 you could have a more critical, a bit more distanced,
9 analysis of the deals. And also, the threshold, even if
10 it's £5 million, at that time that was probably
11 a relatively low threshold at which to scrutinise deals,
12 given that other deals were quite large.

13 And I think this would also have had the advantage
14 that it would have created more requirements for
15 documentation, because in addition to the closing pack,
16 you also had to create that summary.

17 What I was a bit disappointed if not surprised to
18 find out in the evidence is that those deal packs then
19 sometimes were put together after the Clearance Board
20 had looked at the summary.

21 And that makes some intuitive sense, because when
22 you have little resource you don't want to put together
23 a comprehensive deal pack if the Clearance Board is not
24 going to endorse the deal. But I don't understand how
25 you can create a summary of documents that have not been

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1 very important because, from the accounts I have been
2 able to read, even if there were different tracks for
3 the procurement of PPE, even if there were numerous
4 Opportunities teams and they were loads of staff
5 involved, in the end, the decisions on the award of
6 contracts were made by a small number of very senior
7 civil servants who should have had as full documentation
8 as they could have.

9 So, for example, in relation to complying with
10 transparency requirements, it would not have been
11 difficult to use that focus point for the collection of
12 the relevant information.

13 Right? So I think it's important in that it was
14 a very devolved organisation that funnelled into a very
15 single point of decision making and that single point of
16 decision making is going to be of particular interest to
17 the Inquiry, I think.

18 Talking about that decision point, until 5 May 2020,
19 disclosing packs or deals were sent for approval to the
20 Department and the approval was done on the basis of
21 delegated authority, as you also explained yesterday,
22 but from 5 May, probably trying to make this process
23 more robust, a Clearance Board was created, and that
24 Clearance Board was given one to two-page summaries of
25 the closing deals to try to provide additional scrutiny

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1 compiled. So in terms of advantages, it may actually
2 have created the disadvantage of having the scrutiny of
3 deals on the basis of really high-level, very succinct
4 information, rather than fuller closure packs.

5 But that's not been something I've been able to test
6 in reality because I've not seen those documents.

7 **Q.** So the full pack was assembled after a positive
8 decision?

9 **A.** At least in some occasions.

10 **Q.** And the positive decision was based on a high-level
11 summary only?

12 **A.** Yes.

13 **Q.** Understood.

14 **A.** One or two pages, which of course would not have
15 provided lots of detail on the specifics or the
16 contractual requirements in that award.

17 Until that point it's also important to bear out
18 that according to the government's own internal audit,
19 the track record of due diligence and the recordkeeping
20 until the Clearance Board was created was inconsistent
21 and sometimes no records were kept of awards made before
22 the Clearance Board was put in place.

23 So, to me, that would also be a significant issue
24 because, as we said throughout this morning, there's an
25 obligation of recordkeeping, there's an obligation of

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1 transparency. If records are not created and are not
2 kept, we cannot possibly scrutinise what's happened.

3 So there are some awards that apparently even it
4 might be impossible for this Inquiry to look into
5 because there's no records for them. And that would be
6 a matter of concern to me.

7 Now, this is to say the Buy Cell was designed to
8 operate in the sequential opportunities, technical
9 assurance closing, with increasing elements, if you
10 want, of oversight through this clearing board. The
11 other thing that changed through time is that when the
12 backlog through the PPE Cell started to grow, one
13 mechanism to try to accelerate the award of contracts
14 was putting together rapid response teams. This seems
15 to have happened from 24 April, so about a month into
16 the working of the PPE Buy Cell.

17 Those rapid response teams would have had a member
18 of staff from Opportunities, a member of staff from
19 Technical Assurance, a member of staff from Closing, and
20 they were trying to put deals together in one or
21 two days. If they saw that they would not be able to do
22 that, they would send the opportunity back to the
23 standard non-rapid response Opportunities team to
24 progress.

25 What I think this also shows is that the
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1 a rapid response team determination whereas you would
2 into the High Priority Lane or the VIP Lane?

3 **A.** That's my best understanding of the evidence.

4 **Q.** All right. I know you're coming on to the VIP Lane in
5 a moment but I wanted to ask that question in relation
6 to the two.

7 **A.** Yes.

8 **Q.** All right.

9 **A.** Also because the rapid response team was only created
10 from 24 April, there would have been VIP and non-VIP
11 contracts progressed before the rapid response teams
12 even existed, so --

13 **Q.** Because the VIP Lane was established on which date?

14 **A.** That's further down the box but I think --

15 **Q.** It predated, in any event --

16 **A.** It predates the rapid response teams in any event. I'm
17 not exactly sure. I think it was 2 April but I would
18 need to double check that report.

19 **Q.** All right, we can check that, yes. All right.

20 **A.** So, within this PPE Buy Cell there were four routes to
21 contract, and here is where the account from Cabinet
22 Office and the account from Department of Health
23 slightly varies, because the Department of Health
24 includes the make route within the PPE brother cell, the
25 way to describe it, but for the purpose of this account
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1 segmentation of activities was not always happening. We
2 had teams that were doing all of the activities at the
3 same time. And I think that is an important point to
4 bear in mind when the Inquiry will hear that the teams
5 were insulated from each other, for example the
6 Technical Assurance could not possibly be influenced by
7 whatever was happening at Opportunities when you had
8 rapid response teams that integrated all members of
9 staff.

10 And I think -- we've been given some numbers.
11 I think 21 contracts were awarded through these rapid
12 response teams, but I've not been able to see how many
13 of those, for example, were from the VIP Lane and which
14 ones were not.

15 **Q.** I was going to ask, is the rapid response team distinct
16 from the VIP Lane?

17 **A.** *(The witness nodded)*

18 **Q.** Or there may be some overlap between the two?

19 **A.** I think there may be some overlap in that some VIP Lane
20 opportunities were dealt by rapid response teams and
21 some of the VIP Lane members of staff participated in
22 rapid response teams as the Opportunities person for
23 that opportunity. But as a matter of design, if you
24 want, they are separate things.

25 **Q.** So you wouldn't necessarily require a VIP referral into
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1 I rely on the Cabinet Office's description of it.

2 What's been described to the Inquiry is that the
3 PPE Buy Cell run four routes. Route 1 would be the
4 NHS Supply Chain route, where the existing PPE team was
5 trying to buy from existing suppliers.

6 They would run an "open source" route or maybe the
7 "call to arms" route, which was any offer being sent for
8 PPE through a varying approach to web forums and
9 SurveyMonkeys, and we can talk about that later.

10 There was the third route, which was the VIP Lane,
11 which was only for offers referred by an MP, a minister,
12 or a senior official.

13 And a fourth route, which was the China Buy route,
14 which was fundamentally distinct in that it was run with
15 a lot more involvement from the FCDO.

16 So for the purpose of this report, setting for now
17 aside the issue of how the NHS Supply Chain fed into all
18 this, the two routes that are important are route 2 and
19 route 3, so basically the "open to anyone" route and the
20 "referrer only" route 3, VIP Lane.

21 And I think it's important to get to the bottom of
22 why and how the VIP Lane came to exist.

23 And I think there is a mixture of reasons for it.
24 The first issue that is quite clear in the evidence is
25 that there was a big concern about PPE. Everybody knew
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1 there was a shortage. So companies that could provide
2 it and any other third parties were sending their offers
3 for help to all sorts of people, senior civil servants,
4 ministers. So there was information already being sent
5 to the system, and the initial approach was to collect
6 those offers for help and route them through NHS Supply
7 Chain and, within that, through a subcontractor.

8 But that amount of information significantly grew to
9 the point where there was the impression, and I think
10 the impression is borne by the numbers, that this is not
11 a very reactive mechanism. So people were sending
12 offers for help and were not hearing back. So we have
13 a first issue with information not being treated in
14 a timely way.

15 What would happen then is that those with political
16 connections or those with access to an MP would escalate
17 that and say, in simple terms: "I have offered whatever
18 many masks, I haven't heard back, can you chase?"

19 **Q.** Just pausing there for a moment, to be clear, offers
20 made outside the High Priority Lane, or the VIP Lane,
21 was there an expectation or a practice of those making
22 the offers -- they weren't referrers in that context, so
23 those making the offers, hearing back in the way you
24 describe? Did that happen outside the VIP Lane?

25 **A.** No. So for anyone making an offer, they would basically
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1 their MP or a member of the Government at the time to
2 chase, and those chases were sent to the PPE Buy Cell.
3 In the accounts that have been provided to the Inquiry,
4 it's clear that that was a significant volume of
5 communications, that it was a significant draining on
6 the resource of the PPE Buy Cell because the
7 Opportunities teams were spending a lot of time replying
8 to those chasers and, therefore, they were not having
9 all the time to look at the offers that they had
10 received.

11 **Q.** No automated responses?

12 **A.** Not as far as I know. I think there was an attempt at
13 some point by some civil servants to put an automated
14 response saying, "We have received this, we will be in
15 touch", and that was also very quickly escalated.

16 So, basically, those chasing were not willing to
17 take an automated response or a "Please wait and let me
18 do my job" answer. They wanted to know specifically
19 what was going on with the specific offer that they were
20 interested in at that specific point in time.

21 **Q.** All right.

22 **A.** So faced with that challenge, instead of seeking to
23 educate those sending chasers on the importance of
24 freeing time for the civil servants to do their job,
25 instead of sending out basically a general communication
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1 fill in a SurveyMonkey or more structured web form down
2 the line. They would receive an automated response
3 saying, "Please bear with us", and they would have to
4 wait until something was pursued.

5 **Q.** Did that even apply to the rapid response teams that
6 weren't dealing with, when the time came, High Priority
7 Lane or VIP Lane offers?

8 **A.** So I think there is a timing issue there. So in
9 principle yes, but I am not sure if, by the time the
10 rapid response teams were created, all these open source
11 offers would already have been triaged through the
12 separate call centre that was put in place.

13 So it could be there was some engagement before
14 a rapid response team was ever involved but,
15 fundamentally, any offer that was not referred was
16 sitting and people had to wait until an Opportunities
17 team, or the call centre that was put in place later,
18 looked at it and established first contact to verify it
19 the offer still valid and get some more details. But
20 there was no way they could ask for updates on what's
21 happening with my offer.

22 **Q.** All right. You were telling us about the requests or
23 the demands for updates within the VIP Lane?

24 **A.** Yes. So what happened then is that those that had made
25 an offer and had not heard back would be seeking for
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1 saying, "We're going as quickly as we can, we need to
2 use all of our time to that, so please don't chase, and
3 also don't chase because chasers from senior government
4 people or MPs put pressure on these teams that are
5 already very pressured". Instead of taking that
6 approach, instead of the senior leadership of the PPE
7 Buy Cell, when they received those escalations saying,
8 "What does it mean when I got an Out Of Office, what's
9 happening with my offer", instead of going back and
10 saying, "That's the absolutely appropriate response, you
11 don't need to hear more about this now", instead of them
12 maybe organising some communication about how this PPE
13 Buy Cell was put in place, how it was operating, so that
14 general assurance was given that opportunities were
15 being looked at, rather than specific assurance about
16 specific opportunities, they decided to do the latter.

17 So they decided to create a specific dedicated email
18 address that would -- and of course, a dedicated
19 Opportunities team to work on the basis of that, that
20 would only look at the opportunities that had been
21 referred by ministers, MPs or senior civil servants.

22 And to me, that doesn't make any sense and it's not
23 in line with the principles of procurement we were
24 talking about.

25 One of the key worries in trying to avoid corruption
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1 in procurement is to pay very detailed attention to what
2 politically exposed persons do. We know that somebody
3 in a position of power can influence procurement
4 decision making. So creating a dedicated communication
5 channel for politically exposed people to chase
6 opportunities and potentially pressurise procurement
7 decision making, is just completely contrary to the
8 principles of public procurement.

9 In my view, although this Inquiry has been told this
10 was a legitimate operational requirement because we
11 needed the free time from the frontline civil servants
12 that were looking at the opportunities, to me, that's
13 the wrong end of the stick. The legitimate operational
14 requirement was to get the MPs and to get the ministers
15 to wait like everybody else.

16 So they addressed a challenge in the worst possible
17 way in a procurement context, in my view.

18 And this Inquiry has also been told it didn't really
19 matter in the end because it was only the entry point.
20 It was only about getting that feedback that was more
21 timely.

22 But I think the evidence is very clear that there
23 were significant differences of treatment. It's not
24 only that there is already a judicial finding of
25 illegality of the VIP Lane because it didn't provide

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1 Lane was precisely to create speed: speed in reacting to
2 the opportunity, speed in getting the opportunity to
3 contract.

4 So the explanations given in terms of mitigating or
5 contextualising the impact of the VIP Lane are, in my
6 view, not persuasive at all.

7 **Q.** We'll come on to the relative speeds of processing
8 within the VIP Lane and outside it in due course, but
9 you've mentioned one of the High Court judgments, the
10 PestFix judicial review claim, in which a finding of
11 unequal treatment was based on a difference in relative
12 speeds of processing between VIP Lane and non-VIP Lane.

13 What advantage, if any, does speed of processing
14 offer in the context of pandemic procurement?

15 **A.** So in the context of the pandemic procurement we are
16 back into extremely urgent procurement and we already
17 said this morning one of the key requirements in
18 extremely urgent procurement is that it can only
19 comprise what is strictly needed for the satisfaction of
20 the immediate needs. So this was not an exercise meant
21 to screen all possible opportunities without end. This
22 was, by necessity, a time-limited exercise where, at
23 some point, if things went well, the UK Government
24 should have taken the view, "We now have enough PPE for
25 our immediate needs, we now to move competitive

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1 equal treatment but it's that it's foreseeable at the
2 time that, if you have not particularly experienced
3 members of staff with a new challenge in a very
4 complicated high-pressure area, having repeated chasers,
5 knowing that at the other side of an opportunity there's
6 not only a company but there's also a political figure,
7 would have necessarily changed the way they approached
8 things.

9 And this Inquiry has been told this was
10 an opportunity stage issue only, but then VIP offers
11 were sent for technical assurance like any others, but
12 the evidence shows that technical assurance ended up
13 appointing a specific person to deal only with VIP
14 offers.

15 So it's not accurate to say all offers were treated
16 the same from a technical assurance perspective because
17 technical assurance was taking time and having
18 a dedicated person for technical assurance of VIP offers
19 would have accelerated things.

20 The Inquiry has also been told that acceleration
21 didn't actually happen. In the end, the processing
22 times of VIP offers and other offers ended up being
23 roughly the same but that's not something that those
24 creating the VIP Lane could have known at the time.

25 And, if anything, the intent behind creating the VIP

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1 procurement".

2 So there was an uncertain but, by legal requirement,
3 proximate endpoint to the emergency award of contracts.
4 In other words, at some point it would not be possible
5 to get a direct award any more. And that could make the
6 entire difference. If you had been processed quickly,
7 you would be in the initial awardings of contracts; if
8 you were taking longer, you might miss out because the
9 cut-off for the direct award would have run out.

10 Now, in the event, because the UK Government ended
11 up buying so much PPE for such a long time, it could be
12 that, in the end, all opportunities were looked at, but
13 that was not what was required at the time. That was
14 not what was permissible at the time. What was required
15 is to buy the PPE we need right now in the best possible
16 way we can, and then transition out of this emergency
17 procurement.

18 And I think that's what the time advantage goes to.
19 It's a matter of time advantage in principle. In
20 an emergency situation, by definition, being considered
21 first is an advantage.

22 **Q.** Leaving the rate or the speed of processing of offers
23 inside and out of the VIP Lane to one side for a moment,
24 what is said in some of the witness evidence, including
25 some of that which you considered and features in your

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1 schedule, is that the offers that came in through the
2 VIP Lane, that were referred in, were inherently more
3 credible or better offers. Have you had an opportunity
4 to consider that point?

5 **A.** So I have considered that point and I think there is
6 also significant evidence to the contrary. I think
7 there is evidence in front of this Inquiry that, at the
8 time of creating the VIP Lane, those in charge of the
9 VIP Lane were expecting to operate like a sewer,
10 I think, in that the role was mainly to take noisy
11 offers out of the system. So the expectation was not
12 that the VIP Lane necessarily would bring those better
13 offers.

14 The other thing is that it's clear that there was
15 a big disparity in the types of offers that went through
16 the VIP Lane, and there was also confusion about whether
17 VIP or High Priority actually meant political referral
18 or high operational need.

19 So the other thing I have also not been particularly
20 clear on, after reading all the evidence, is whether
21 some high-quality offers ended up in the VIP Lane by
22 mistake, if you want. So they would not have been
23 referred by a politician, but they were forwarded to
24 that team because it was understood to be a high
25 operational priority team and then they progressed them.

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1 fact that they were referred meant the offer was being
2 progressed, even if their offer might not have been
3 progressed on the basis of the other triage criteria.

4 For example, the Department of Health has explained
5 that in the open route, the initial sifting at the early
6 stages of the pandemic was carried out by size of the
7 company, size of the offer. So, for example, a very
8 small or newly created offeror, supplier, that had
9 a political connection, probably jumped over the first
10 hurdle. But they wouldn't have in ordinary triage
11 because, if you had a balance sheet of £10, triage would
12 not have progressed you. But if you had a balance sheet
13 of £10 and were referred by a senior minister, you were
14 followed.

15 So that's a significant change.

16 Then it also allowed for a channel to continuously
17 push for the processing to be moved forward. It's not
18 true that the VIP Lane only engaged at the opportunities
19 stage; the VIP Lane could provide updates once the offer
20 was sent to Technical Assurance, once it was with the
21 other phases of the procurement lane because each of
22 those teams had a dedicated person that the VIP Lane
23 staff could ask for updates about. So the other
24 advantage as a company, is that you had a lever to keep
25 pushing, pushing, pushing for your offer to be taken to

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1 I think there is evidence in front of this Inquiry
2 that the VIP Lane on occasion processed offers that came
3 from Route 2, and what I've not been able to see is how
4 many of those cases we had.

5 So I think the people making these decisions didn't
6 really have the expectations that VIP Lane offers would
7 be particularly credible or better. They were concerned
8 about managing the pressure exercised. And I think
9 that's what's really crucial. Because what is relevant
10 in understanding decision making is what information is
11 available to those making the decisions, how reasonably
12 we can expect them to anticipate problems in making
13 those decisions, not necessarily what happened after the
14 fact.

15 **Q.** What advantage, if any, did processing through the VIP
16 Lane confer on a supplier or an individual offer?

17 I draw a distinction between those two because, as you
18 will know, some suppliers secured multiple contracts
19 pursuant to multiple offers.

20 **A.** Yes.

21 **Q.** So are you able to provide the Inquiry with answers to
22 both aspects of that question?

23 **A.** So I think in terms of a supplier, I think the
24 advantages to a supplier were that they had an immediate
25 way of first putting weight on their offer, because the

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1 deal, whereas other companies didn't have that.

2 **Q.** In terms of that pushing, one consequence is rate of
3 processing. Did that pushing enable adjustments to be
4 made to the offer, or an iterative process?

5 **A.** I haven't seen evidence to that. I don't know.

6 **Q.** All right. That's very fair. Thank you.

7 In terms of the outcome, though, what were the
8 prospects, improved or otherwise, of an HPL offer,
9 compared to a non-HPL offer, or the prospects for an HPL
10 supplier, compared to a non-HPL supplier?

11 **A.** So at the supplier level, I think we had lots of
12 individuals making very difficult calls on very limited
13 information, and probably nobody wanted to be the one
14 that missed out on a good opportunity for being too
15 strict on specific things. So I think that
16 significantly changed the likelihood of HPL contracts
17 being awarded to suppliers because, when information
18 indicated, for example, a borderline situation, I would
19 have expected individuals to make that decision to think
20 twice before saying no because they could expect
21 follow-ups. I think this is human nature.

22 So I think -- I haven't seen detail of it, but
23 I think there's a very strong indication that in close
24 calls VIP had an advantage because of the pressure on
25 the decision maker.

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1 Q. Well, you've included in one of your bullets, this is on
 2 the second page, three down, 10:1 --
 3 A. Yes.
 4 Q. -- improved rate of success per supplier.
 5 A. That's the outcome.
 6 Q. That's the outcome?
 7 A. Right? So what resulted, as probably an effect of this
 8 systemic pressure, to get VIP deals concluded, is that
 9 VIP suppliers were ten times more successful on the
 10 basis of the evidence I've been able to see. I know you
 11 showed yesterday data that says it's actually 17 times
 12 more successful.
 13 Q. Well, that's if you look at offers rather than
 14 suppliers.
 15 A. Okay. So the distinction between suppliers and offers
 16 is also something I cannot fully appraise because I've
 17 not seen a breakdown of suppliers and contracts, or
 18 offers. But what I would have imagined is that, under
 19 the VIP Lane, because this was about supplier being
 20 referred, everything a supplier had to offer probably
 21 was progressed quickly. So say a supplier was offering
 22 FFP3 masks and gloves, probably they were both looked at
 23 the same time, whether the priority that day was to buy
 24 gloves but maybe not an FFP3 mask. That's what
 25 I imagined might have happened, and that's what probably
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1 contracts, so VIP suppliers, and that's even more stark.
 2 So I think it doesn't come naturally to say, because
 3 VIP offers were better, they fundamentally made up 90%
 4 of the awards, which is what 10:1 means.
 5 Q. Understood.
 6 LADY HALLETT: Can I just ask a question -- sorry to
 7 interrupt.
 8 MR WALD: Of course.
 9 LADY HALLETT: When you say the contemporaneous evidence
 10 shows the VIP Lane brought a mixed bag of offers, what
 11 is the evidence that they're relying on, just for my
 12 notes?
 13 A. So, in witness statements, you have been told that there
 14 were lots of very noisy offers that didn't fall through,
 15 that lots of the offers through the VIP Lane were
 16 actually contacts that never borne anything. So you
 17 will have statements by I think particularly the PPE
 18 lead cell that shows that they were not getting
 19 particularly better offers.
 20 LADY HALLETT: Thank you.
 21 MR WALD: Unless you wanted to say more on that particular
 22 point, I was going to take you to the bullet point
 23 below, the one that starts "The 'VIP Lane'".
 24 A. Yes.
 25 Q. You indicated earlier one particular principle that is
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1 shows that, by offers, the success rate is even higher
 2 than by suppliers. That's how I would understand the
 3 evidence.
 4 Q. All right. Let's stay with the 10:1 figure you included
 5 in your report then.
 6 A. Yes.
 7 Q. You may have touched on this, but I want to be
 8 absolutely certain of your evidence, if I may. If it is
 9 said -- and it is said in some of the evidence -- that
 10 that 10:1 comparison simply shows how helpful, how
 11 useful, how effective the HPL was, what is your response
 12 to that?
 13 A. So I think that would only make sense if the evidence at
 14 the time showed that, fundamentally, all of the VIP Lane
 15 offers were significantly better, and all of the open
 16 source offers were really bad. But that's not what the
 17 contemporaneous evidence shows. The contemporaneous
 18 evidence shows that the VIP Lane brought a mixed bag of
 19 offers and that's why a 10:1 ratio is really surprising.
 20 You could expect some variation but not ten times fold.
 21 The other thing that I think is also really
 22 interesting in that, is that 10:1 in terms of supplier
 23 by headcount, if you want, is also something that needs
 24 to be looked at more broadly. In the end, about 50% of
 25 the value produced by the PPE Buy Cell went to VIP Lane
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1 offended by the VIP Lane, and that was the involvement
 2 of ministers, but here at this bullet you say that it
 3 did not meet most of the requirements applicable to
 4 procurement during the pandemic. Which of the other
 5 ones arise, or are offended?
 6 A. So what we said is that in extremely urgent procurement
 7 the obligations are to keep records, to proactively
 8 publish transparency of contract awards, and to screen
 9 for conflicts of interest. All of those are offended by
 10 the VIP Lane. First -- and the PPE Buy Cell more
 11 broadly, because there were no adequate records kept,
 12 especially in the initial stages of the functioning of
 13 the cell.
 14 And I think this is particularly shocking to me
 15 because, when the process for the procurement in those
 16 eight stages that you described yesterday was designed,
 17 according to evidence submitted by the Department of
 18 Health -- and I think this is in figure 9 of the
 19 submission -- in stage 7, there's an explicit reference
 20 to Reg 84 report. Reg 84 is basically the obligation
 21 under the rules applicable at the time to have a full
 22 record of decision making and to have the specific
 23 information that is going to be required to publish
 24 a transparency notice.
 25 So when the cell was being created there was an
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1 awareness that this had to be compiled and kept but
2 didn't happen. And there's plenty evidence that records
3 were patchy or didn't exist, and this has been
4 criticised in the government's internal audits and also
5 by other oversight rules. So I think that's
6 incontrovertible.

7 So there was insufficient or non-compliance with the
8 obligation to keep records.

9 There was also massively delayed and until today, to
10 the best of my knowledge, still partial non-compliance
11 with the obligation to publish contract award notices
12 and contract details. It's been recognised that --
13 I think it's 94% of the contracts awarded through the
14 PPE Buy Cell were late in publishing transparency
15 notices.

16 So that's also a breach of that requirement.

17 **Q.** Is that a problem in practical terms? If they're
18 published, albeit late, does that create problems of
19 transparency?

20 **A.** It creates very big problems of transparency.

21 **Q.** Very big?

22 **A.** Very big. We need to think about what is the purpose of
23 those notices. The purpose of those notices is to
24 disclose to the public how, under extreme urgency and
25 pressure, government is making decisions. I don't think

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1 **A.** Yes.

2 **Q.** -- on the VIP Lane, that it was unlawful on grounds on
3 unequal treatment?

4 **A.** Yes.

5 **Q.** Due to the speed of processing?

6 **A.** But also not only due to the speed but due to the fact
7 that, for spurious reason, it had nothing to do with the
8 content of the contract to be awarded. There was
9 a triaging of those offers through the VIP route. So
10 what the court says, and it needs more recognition, is
11 that preferring an offer simply because it's been
12 referred by a politically exposed person is not
13 a legitimate ground, in the context of procurement
14 decision making.

15 **Q.** Yes, although it's right to point out that, in that
16 case, the contracts under consideration were found to
17 have been ones that would have resulted in grants of
18 contracts in any event, the offers would have resulted
19 in awards?

20 **A.** That's fair but that goes only to the point of remedies.

21 **Q.** It does.

22 **A.** And I think that's important to say. The issue of
23 remedies in procurement is a difficult one, because once
24 a contract has been awarded and basically fulfilled,
25 there's nothing the court can do but eventually grant

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1 it's outside the realm of possibility that if some of
2 those extremely high-value awards to extremely
3 inexperienced suppliers had been put in the public
4 domain in a timely fashion, there would have been some
5 mechanisms to maybe even prevent those contracts from
6 ever being implemented.

7 So it's extremely important in a situation where
8 there is no forewarning, there's no planning of what's
9 going to happen, when things are presented as
10 a *fait accompli* to society, that that happens as quickly
11 as possible.

12 And I think there was an awareness, at least in some
13 of the evidence I have seen, that transparency would
14 have triggered criticism in public opinion, and
15 therefore it's almost justified in some of the
16 witnesses' evidence to not have provided that
17 transparency, to avoid that public scrutiny at the time.
18 And I think, again, that's a very significant violation
19 not only of the requirements under the law but also the
20 spirit of the law.

21 **Q.** Understood. And you deal in -- it's not your
22 penultimate, it's your antepenultimate, because there's
23 another bullet point over the page, but you deal, the
24 penultimate one on this page, again, with the High Court
25 decision --

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1 damages. And in the specific context of that
2 litigation, damages was not a great remedy to give,
3 because of the type of claimant that we had but also
4 because it maybe would have been seen by the court to
5 add offence to injury.

6 So I think that's important to put in context.

7 The other thing that is important is that I think
8 this Inquiry has been given evidence that in other case
9 contracts, the decision probably would not have been to,
10 in any way, award the contract through the VIP Lane.

11 So I think the richer and broader evidence in front
12 of this Inquiry will allow for a more nuanced and more
13 comprehensive analysis than the court could do at the
14 time with the evidence in front of them.

15 **Q.** Of course. The court is focused on the limited
16 parameters of the claim that is brought before it. Yes,
17 that's quite right.

18 The bottom bullet on this page tell us what perhaps
19 may be already apparent from your evidence, which is
20 that you are unpersuaded by the rationale or the reasons
21 for the creation of the VIP Lane or its justification.

22 But I want to ask you this: to those who say that
23 the government faced a Herculean challenge to acquire,
24 at speed, vitally required PPE and other procurement
25 materials, it was deluged with offers, it needed to

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1 enact some system of prioritisation, what do you suggest
2 as an alternative method of coping with that that would
3 not offend the principles to which you have referred?

4 **A.** The alternative method was inside the PPE Buy Cell
5 itself. The criteria for prioritisation for route 2
6 were fundamentally looking at the credibility of the
7 offer and the content of the offer. And that would have
8 been appropriate.

9 So, in a context where the government receives more
10 offers than it needs or that it can process, it should
11 prioritise on the basis of which ones are more likely to
12 lead to a contract. That's the relevant criterion to
13 look at.

14 And it can be difficult to implement, but in that
15 case, it is legitimate. So, for example, it could have
16 been that the government decided: we don't engage with
17 any company with less than three years' experience of
18 PPE because we don't know if they're going to be able to
19 source it or not. Or: we don't engage with offers for
20 less than 1 million-items because it's not going to be
21 worth it in terms of logistics.

22 Anything that is operational or goes to the
23 likelihood of this being an offer that is going to be
24 effective would have been legitimate.

25 So the criticism is not of creating a priority lane
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1 obviate the need for all of that?

2 **A.** I think if the parameters were clear, then it wouldn't
3 require feedback because the Government could simply
4 say, "As of today, for example, we only engage with
5 companies with more than three years' experience. If we
6 don't get enough with those companies, we will come back
7 to you". That would be obvious to anyone, and so any
8 objective threshold would prevent the need for
9 follow-ups.

10 The other thing that would allow is for a much more
11 structured response, where the specific reason why
12 something is or is not taken forward is almost
13 pre-determined because there is a clear threshold.

14 When things are done in a very unstructured way,
15 then every decision needs explaining, so, even in the
16 context of an MP chasing, it would be much easier to
17 say, "The company you referred doesn't have three years
18 experience, therefore it's not progressed", than having
19 to justify why, under fast-moving approaches to
20 prioritisation, that specific company is not being taken
21 forward.

22 **Q.** We've touched on data and it's SMART use in this
23 context. Could that play a part in managing a system to
24 consider a range of offers under great time pressure and
25 changing demands?

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1 or a priority approach, the criticism is to create
2 a priority for offers that have been referred by
3 politically exposed persons, which is operationally
4 relevant and breeds risks of corruption.

5 And on that, I would also like to comment that some
6 of the evidence in front of the Inquiry puts a lot of
7 emphasis on the perception of corruption as if almost it
8 was an issue of managing public reaction to what was
9 being done. And I think that misses the point of the
10 actual vulnerability of the PPE Buy Cell to corruption
11 the way it was created.

12 And to me, that's a key point that needs addressing.
13 It's not about whether suspicious journalists are going
14 to say this thing or the other; it's about putting
15 processes that are as robust as possible to prevent
16 corruption in a situation where things are done quickly
17 and probably not with the transparency and reflection
18 time that would be available in normal times.

19 **Q.** In the proposed alternative system that you have shared
20 with us, where, say, a company without at least three
21 years' experience is excluded from consideration or one
22 that is unable to provide at least 1 million items,
23 would there then be the same need for feedback, for
24 follow-up, that iterative process that went on with the
25 VIP Lane, or is there some other system that might
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1 **A.** It would. So I think one of the key operational
2 problems that the PPE Buy Cell had was that it had
3 insufficient and very unstructured data. So every time
4 they wanted to find out more about a specific offer,
5 they had to go back to the offeror and ask for more
6 details. They also didn't have a way of, on the click
7 of a button, comparing different offers.

8 This is not science fiction. In procurement that
9 engages with large numbers of suppliers, such as
10 framework agreements or Dynamic Purchasing Systems,
11 there are established approaches to collecting
12 structured data and creating electronic catalogues,
13 which basically would allow someone who is told, "Today
14 we are really looking after visors", to simply
15 prioritise in relation to visors, and also not any
16 visors but specific types of visors.

17 I think the other problems with the data, as far as
18 I have been able to see it, is that it was at category
19 level, so gowns. But gowns come in all sizes. So it
20 would also be difficult within the category of gowns to
21 find the specific gowns we need.

22 So I think there was a poor approach at the
23 beginning, because there was a rush, to thinking about
24 how detailed the information we need is going to be and
25 I think that maybe would have been mitigated if experts
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1 from NHS Supply Chain would have informed that, for
2 example saying, "This is how we structured the
3 information for the gowns that we buy".

4 I don't know information that happened, I haven't
5 seen the evidence, but the indication is that that
6 didn't happen because NHS Supply Chain was doing its
7 thing and PPE Buy Cell was doing a different thing.

8 But also, once there is a review of these issues
9 because the PPE Buy Cell is so overwhelmed, once they
10 developed a Mendix database, fundamentally a new way of
11 trying to structure the information, that structuring is
12 process based. They are concerned about can we record
13 when we call suppliers? Can we record when there's been
14 a handover from the Opportunities team to the Technical
15 Assurance team? There is no thinking about the
16 structuring of the data on a product line basis, which
17 is what would have been really needed for people having
18 to change priority quickly or comparing issues by
19 volume, for example.

20 **Q.** Do you want to just explain what Mendix is?

21 **A.** So the understanding I have is that Mendix is a low code
22 database platform and what happened in this context is
23 that the PPE Buy Cell started receiving information in
24 a very unstructured way through a SurveyMonkey, then
25 they create a web form that would feed into an Excel

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1 saying, "We are now using Mendix, this is the template
2 you need to fill in in relation to your offer, if you
3 still want it to be considered". These were still being
4 done through specific caseworkers that were contacting
5 the offerors. So instead of the public sector
6 offloading the requirement of putting the data in
7 a specific context on each of the offerors, which would
8 be a small burden upon each of them, took it upon itself
9 to put all of the data in that context, as far as I've
10 been able to see.

11 **Q.** All right, Professor, I want to move you on to the
12 Ventilator Challenge but I don't want your last bullet
13 point to be forgotten and I don't want you to be
14 deprived of the opportunity to say anything further if
15 you wanted to on the Parallel Supply Chain including the
16 VIP Lane. So let's just start with that final bullet
17 point where you make a simple observation but
18 an important one.

19 **A.** Yes.

20 **Q.** Do you want to just share that with the Inquiry, please?

21 **A.** So I think the observation is that, once everything is
22 counted, the volume in pounds of the contracts awarded
23 through the VIP Lane make up 50% of all of the contracts
24 awarded through the PPE Buy Cell and I think that's
25 stark and, to me, potentially very problematic, in the

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1 spreadsheet but they had problems ensuring the integrity
2 of the data, so then on a specific weekend of March they
3 bought in a team from the data pool from Cabinet Office
4 to develop a new database and that database was coded in
5 this Mendix language, so to speak.

6 And that became, through a process of iteration, the
7 data platform for the PPE Buy Cell. But what is also
8 not clear to me in the evidence I've seen is how these
9 things were transitioned, how data in one format was
10 then migrated into Mendix, and what the filtering
11 functionality by line item in Mendix was. But, to the
12 extent that I've seen it, it was not particularly
13 advanced and I think the Government's Chief Commercial
14 Officer has recognised in the evidence that it was
15 something rough and ready and relatively pedestrian, put
16 in place quickly. So I wouldn't expect it to be
17 particularly good at filtering the data.

18 **Q.** But it could be better?

19 **A.** It could be much better.

20 **Q.** Offerors could be provided to require information that
21 would feed directly into Mendix or whichever system
22 replaced Mendix?

23 **A.** Yes, so the other thing that I was surprised to see in
24 the evidence is that, once Mendix is developed, there is
25 no systematic approach to going back to every offer and

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1 context of officials fundamentally downplaying the
2 impact that the VIP Lane had or seeking to justify it.
3 I think that the fact that half of the value spent was
4 through an unlawful route should give us time to pause
5 and reconsider.

6 **Q.** So it's stark for you because it's unlawful, rather than
7 because the HPL offers represented a small minority of
8 overall offers?

9 **A.** So for both.

10 **Q.** For both reasons?

11 **A.** So the issue that they represented a small amount is
12 what I had raised earlier, that it was 10:1 by supplier
13 chance, but the fact that, this time later, those
14 involved don't really recognise that billions of pounds
15 were spent unlawfully and that that is a big problem, to
16 me, speaks to a dysfunctional culture of lesson
17 learning.

18 **Q.** Anything else you want to say on the Parallel Supply --
19 No. So in that case, let's move on, if we may, to
20 the Ventilator Challenge.

21 It's Box 20, it's page 131, same document,
22 INQ000539153. It's fair to say you have some concerns
23 also about this aspect of the government procurement
24 during the pandemic?

25 **A.** Yes.

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1 Q. Yes, so once again, if you'd like to speak to Box 20,
2 please.
3 A. Yes. So ventilators were another of the items that were
4 in high projected demand, in the early stages of the
5 pandemic. There was an insufficiency within the NHS
6 system, so the Government also set out to buy
7 ventilators to increase capacity. They structured this
8 through a two-prong approach, one approach was to try to
9 buy ventilators that were already licensed for use in
10 the UK from existing suppliers and the Department of
11 Health led on that effort, and then Cabinet Office
12 created the so-called Ventilator Challenge to try to
13 explore the possibility of adapting or developing new
14 ventilators and prototypes.

15 The reasons why the Ventilator Challenge was created
16 are also important, as in the VIP Lane, I think, because
17 I would have imagined that the second-best option to
18 buying ventilators that are licensed and produced by the
19 manufacturer would be to obtain a licence, so that
20 somebody else can manufacture the same safe-to-use
21 ventilators, rather than trying to develop new
22 ventilators. The evidence in front of the Inquiry shows
23 that, typically, it can take years to develop a new
24 ventilator. So I am at pains to understand how
25 an approach to emergency procurement would have been

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1 technical development of the new prototypes so they
2 could probably also have provided consultants to train
3 on the production of licenced models, and they also
4 provided immunities from damage but also from
5 intellectual property infringements to third parties.

6 So one of the things that I would think are of
7 interest to the Inquiry is to try to understand in more
8 detail why a government that is willing to step in to
9 support supply chains, that is willing to engage
10 a significant number of private consultants and is
11 willing to provide indemnities would not, as a first
12 approach, try to do that by follow up with existing
13 manufacturers, and would rather try to facilitate the
14 development of new prototypes.

15 Also, because that approach immediately means that
16 the award of those contracts was in breach of the
17 extremely urgent procurement authorisation,
18 Regulation 32, because, as we said through the morning,
19 you can only award contracts for what you immediately
20 need, you need to be sure that you will get the supplies
21 quicker than if you'd run a competitive procedure.

22 Q. Is that, Professor, why the point you make is
23 a procurement point rather than just a commercial point?

24 A. Yes, because commercially I don't know whether it would
25 have been possible or not to persuade the suppliers.

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1 extended to the development of new prototypes, that
2 would definitely not be available in the short-term and
3 that was also a high-risk endeavour in terms of the
4 expenditure of public funds because, like all research
5 and development, it's not necessarily going to be
6 successful.

7 So the first thing to say is that the reasons why
8 the government has explained to the Inquiry they didn't
9 really pursue more than briefly the possibility of
10 licences are, to me, not fully satisfactory because the
11 Government Chief Commercial Officer has submitted that,
12 when they approached manufacturers asking for licences,
13 all but one refused. And they imagined that the reasons
14 for that refusal would be that they were really busy
15 trying to scale up their own production, that they would
16 be worried about the availability of components and that
17 they would be worried about liability if, for example,
18 there was injury or death as a result of an improperly
19 manufactured licensed ventilator.

20 But in the evidence in front of the Inquiry, within
21 the context of the Ventilator Challenge, it's clear that
22 Cabinet Office directly engaged with the issue of supply
23 chain for components, to the point of directly
24 approaching producers for components. They also funded
25 a very large number of consultants to support the

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1 But from a procurement perspective, that was not
2 a legally permissible approach to take.

3 Q. All right. So what was the better approach?

4 A. So the better approach would have been to carry out, at
5 the very least, a competitive procedure with
6 negotiations, which would only have required the
7 government to comply with a very quick, accelerated time
8 period, and would have ensured that the terms and
9 conditions that they were agreeing with those looking to
10 develop the prototypes were market tested. And it would
11 also have allowed the government to have a much more,
12 from the beginning, structured disclosure of what they
13 were doing. It could also have brought other potential
14 innovators to the table on the basis of advertising the
15 opportunity.

16 By simply issuing that specific call to arms and
17 calls with industry and creating specific teams, the
18 Government not necessarily would have guarantees that
19 everyone that could have developed new ventilators was
20 included, whereas a competitive procedure would have
21 allowed those companies to come forward.

22 I think it would also have been possible to meet all
23 of the reasons why the government thinks they needed to
24 engage in direct awards through that approach. So the
25 government would have been able to pay the innovators

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1 for their participation in the competitive procedure of
 2 negotiations. They would have been able to retain
 3 ownership of intellectual property created under the
 4 contract. They would have been able to address all of
 5 the reasons why they now explain they did -- or they
 6 engaged in this decision for.

7 **Q.** All right. You say at the bottom of this box that there
 8 were some aspects of the Ventilator Challenge that show
 9 the UK Government's willingness to use it for industrial
 10 policy purposes. What do you mean by that?

11 **A.** What I mean by that is that the evidence in front of
 12 this Inquiry shows that, at the beginning of the
 13 Ventilator Challenge, there was keenness from the
 14 Prime Minister and other senior ministers to have
 15 a group of homegrown companies do their effort to deal
 16 with the ventilator shortage. And I think that
 17 "homegrown" already indicates an engagement with
 18 UK industry that to me is not necessarily reflective of
 19 the needs.

20 A government in dire need for ventilators would not
 21 necessarily care whether an innovator is based in the UK
 22 or based in Singapore; they would want a new ventilator
 23 available.

24 **LADY HALLETT:** Surely if you have people who can
 25 manufacture here in the UK, I appreciate they have to

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1 Because there were key decision makers considering what
 2 Dyson wanted or what Dyson would get out of an award of
 3 a direct contract rather than what the public sector
 4 would get from Dyson under that contract.

5 **MR WALD:** All right. Well, I think we can leave it there
 6 because we're going to be hearing a little bit more
 7 about that tomorrow.

8 Let's just turn to the last bullet in this box, if
 9 we may, Professor, where you draw the threads together.

10 **A.** So the last bullet comes to say, by having senior
 11 ministers instruct civil servants to award a contract to
 12 a company, even if it's a contingency contract, on the
 13 basis of the interests of that company or how that
 14 company is going to be able to market its product
 15 elsewhere, is impermissible. It's impermissible within
 16 the procurement rules.

17 And here it's no excuse to say this was a direct
 18 award, and therefore most of the procurement rules don't
 19 apply because the decision itself to engage with direct
 20 awards was not in line with the rules. So the fact that
 21 this did not happen within the context of a competitive
 22 procedure, for example, doesn't detract from the fact
 23 that that instruction to award a contract was just
 24 impermissible.

25 **Q.** Understood, thank you, Professor.

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1 get supplies and the equipment they need to produce the
 2 ventilator, but surely isn't it better to have it
 3 produced onshore?

4 **A.** I fully agree on the production onshore, but at this
 5 stage it was not about production; it was about design.
 6 So what they were trying is to get companies to either
 7 adapt ventilators that existed or come up with a new
 8 one, and that could have been done abroad but then
 9 manufactured in the UK.

10 **LADY HALLETT:** Sorry, I hadn't followed the point you made.

11 **A.** Apologies if I wasn't clear on that.

12 **LADY HALLETT:** No, it was probably me.

13 **A.** But it's also not at that general level of referring to
 14 homegrown companies, but from the beginning it is clear
 15 that some companies are involved in the Ventilator
 16 Challenge on grounds that don't have actually to do with
 17 their ability to develop a ventilator in a very short
 18 period of time.

19 And it's also clear in the evidence that is in front
 20 of this Inquiry that, in particular in relation to
 21 Dyson, there was preferential treatment, and there was
 22 preferential treatment for political reasons, and
 23 preferential treatment wasn't only impermissible under
 24 the procurement rules but was more generally
 25 impermissible in matters dealing with public interest.

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1 We've dealt now with procurement pre-pandemic, we've
 2 dealt with procurement during the pandemic. I want to
 3 turn relatively briefly now to that third phase, that
 4 third period of time that you address in your expert
 5 report, the post-pandemic period.

6 It would be helpful if we could have summary box 22
 7 brought up. It's on page 140, obviously the same
 8 Inquiry document, INQ000539153.

9 And you start with a reference to the Boardman
 10 Review.

11 Just for those who are not familiar with it and its
 12 consequences, if you'd like to introduce this box by
 13 explaining briefly those matters.

14 **A.** Yes. So at the later stage of the pandemic, the
 15 government itself asked Sir Nigel Boardman to engage
 16 with two reviews of how procurement had taken place, and
 17 the one that is referred to is the second review.

18 And in that second review there were findings of
 19 operational challenges and difficulties in implementing
 20 the reaction to the pandemic from a procurement
 21 perspective, and there was a long list of
 22 recommendations made.

23 In my view, those recommendations are adequate.
 24 I think there are also some more recommendations that
 25 could have been made on the basis of the analysis in the

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1 Boardman Review, for example about IT systems. But the
2 position at this moment is that the government has
3 formally accepted all recommendations, and the
4 evidencing in front of the Inquiry is that the
5 recommendations have been implemented.

6 But all accounts of the implementation of those
7 recommendations on revising how NHS Supply Chain
8 operates or revising issues of staffing or revising
9 issues of data, are process-based accounts that simply
10 say: on this date this committee said this, on that date
11 we considered the recommendation was implemented. But
12 there is no detail whatsoever of what specific measures
13 were adopted, what specific changes have been
14 implemented. Which means that there is no external
15 possibility by civil society or this Inquiry, unless
16 it's given more evidence, to make a judgement on whether
17 any of the specific recommendations have been
18 sufficiently or properly implemented.

19 And to me, that basically means we need a more open
20 approach to explaining what was changed. So if Crown
21 Commercial Service and the rest of the Government
22 Commercial Function was not working in a particularly
23 joined-up way, like the Boardman Review fleshed out,
24 what's been done to make sure that it works in a more
25 joined-up way, rather than simply saying, "We have made

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1 issues identified in the report would carry through to
2 legislation. In my view that has not happened.

3 **Q.** All right, thank you for that.

4 You make a particular point -- yes, that's fine.
5 Thank you for that.

6 You, if I may say so, are a valuable source of
7 international comparisons. You deal with a comparison
8 of approaches in the next section of your report. You
9 look at it both across the devolved administrations and
10 then internationally. I wonder if you could pick up
11 those points, starting with the devolved
12 administrations, offer your comments, your reflections
13 on that comparison to be made, and then move on to the
14 international comparisons, please.

15 **A.** Yes. So the short of the comparison is that the general
16 approach to reacting to the pandemic was very comparable
17 in the UK and other jurisdictions internationally, but
18 also within the four nations of the UK, except for the
19 VIP Lane.

20 So the VIP Lane is clearly an outlier. There was no
21 equivalent in the devolved administrations as far as
22 I could see. There is no equivalent in any
23 international jurisdiction as far as I've been able to
24 assess. So that's the main difference.

25 The other issues that in other jurisdictions that

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1 them work in a more joined-up way"? We need more detail
2 on the standard.

3 And this is important because probably the Inquiry
4 will want to make recommendations along the same lines
5 of what the Boardman Review said, and it would not be
6 good enough for the response to be: we already
7 implemented this in the context of Boardman. And that's
8 why we need more detail.

9 **Q.** Does the enactment of the Procurement Act 2023, just
10 last week, have any bearing on this at all?

11 **A.** So it has a bearing in that, at the time of the Boardman
12 Review there was a proposal for new legislation but
13 there was no Bill at the time, there was only a process
14 of reforming, and there was an expectation or a hope in
15 the Boardman Review that the Procurement Act would fix
16 some of the issues that were identified in that
17 analysis.

18 In my view, that's not been the case. So in my
19 view, the Procurement Act has not meaningfully changed
20 any of the issues that arose from systemic
21 non-compliance with requirements for emergency
22 procurement, and the new regime doesn't create adequate
23 enforceable safeguards.

24 So in that regard, I think that's the bearing it
25 has, that there was an expectation that some of the

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1 had had a more restrictive approach to emergency
2 procurement, for example by enacting requirements of
3 minimum offers, like was the case in Italy or in
4 Romania, at the beginning of the pandemic, those
5 requirements were overridden or suspended.

6 **Q.** Minimum number of offers, how does that work?

7 **A.** So that would work -- in those jurisdictions, before you
8 can engage in a direct award, you need to ask for offers
9 from a minimum number of potential suppliers.

10 **Q.** I see.

11 **A.** So rather than choosing supplier 1 and contracting, you
12 need to approach suppliers 1, 2 and 3, and then, on the
13 basis of those three offers, provide a contract. That
14 was suspended or withdrawn because it was not
15 practicable.

16 So this is to say that the UK's flexible permissive
17 approach to direct awards was in line with what happened
18 in all jurisdictions, either because of prior
19 legislation or changes brought in because of the
20 pandemic.

21 **Q.** So you refer to Germany's 'take it or leave it' market
22 engagement. Do you want to explain how that worked?

23 **A.** Yes. So in Germany, at the outset of the pandemic, the
24 relevant authorities published a set of contractual
25 conditions for different products and basically said:

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1 anyone that wants to provide these specific products in
2 this specific condition is going to get a contract.

3 So this is an approach where the contracting
4 authorities go to the market with their maximum price,
5 for example, or maximum tolerance, with a specific
6 technical requirement, and whoever can meet it comes
7 forward. There is no need for negotiation, there is no
8 need for triaging.

9 And although it's been commented that after the fact
10 that approach was not necessarily fully successful,
11 because some of the contracts were also problematic,
12 what I say in the report is that that is a completely
13 different approach to the market. Instead of completely
14 unstructuredly going to the market and seeing what comes
15 in, which can overwhelm a system, going out with
16 a specific set of conditions both prevents corruption
17 and maladministration in the sense that the conditions
18 are set, they are not open to negotiation, but also,
19 very much reduces the bureaucratic task, in that the
20 offers will or will not match the requirements.
21 That's it.

22 So my point there is that that would have been
23 a more procurement-informed and likely to be successful
24 approach, to go to markets saying, "We need this
25 specific type of PPE, this is the price we're ready to
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1 loose context than in other jurisdictions. And I think
2 that that tradition in approach to ministerial deference
3 in this case created a very significant problem, because
4 I think where you have more ministerial involvement it's
5 more difficult to draw the line of what is allowable or
6 not for a politically exposed person to do.

7 And I think that in the same way, for example, we
8 will not think it permissible on the basis of convention
9 for an MP to be asking Ofcom what is happening with his
10 licence, for example, the same thing should happen in
11 procurement, but for some reason that sort of innate
12 impermissibility of the level of engagement did not work
13 here.

14 **LADY HALLETT:** But isn't there a similar level of engagement
15 between ministers and officials in the devolved nations,
16 for example, in Scotland?

17 **A.** So I don't know if that happens as a matter of general
18 course but, on the evidence I've seen, there was no
19 involvement of ministers in the way offers were triaged
20 or --

21 **LADY HALLETT:** No, no, but not in -- sorry, I'm not -- I'm
22 just talking about generally. I thought you were saying
23 that one of the reasons that the VIP Lane may have been
24 possible is because there's a close engagement between
25 ministers and officials. But I'm asking whether that
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1 pay", or, even if the price was negotiable, there is
2 a ceiling of price or something like that, than trying
3 to just try to see what the market can offer.

4 **Q.** All right.

5 You make your observation in your section on the
6 devolved administrations that there was no equivalent of
7 the High Priority Lane in Wales, Scotland or
8 Northern Ireland. You make a similar observation in
9 relation to your international comparison, that as far
10 as you know there is no equivalent of the High Priority
11 Lane abroad.

12 If you are able to comment, then please do. To what
13 do you attribute the uniqueness of the High Priority
14 Lane, the VIP Lane, within England?

15 **A.** So I think, in my opinion, it comes from the approach to
16 deference to ministers and MPs that is embedded in the
17 way the English Civil Service operates.

18 There is usually a level of ministerial access to
19 the activities of the Civil Service that I don't think
20 exists in other restrictions, not only in procurement,
21 but generally. So because of the specific way in which,
22 for example, constituency work is done, MPs sometimes
23 legitimately follow up with Civil Service. There is no
24 hard and fast division between what is appropriate and
25 what is inappropriate engagement. It's a much more
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1 principle doesn't also apply to Scotland and possibly
2 Wales. I can't remember about Northern Ireland because
3 they act a bit more in silos. But I'm suspecting that
4 the level of engagement applies throughout the UK, and
5 therefore why is it that only England gets the VIP Lane?

6 **A.** So I think, without disagreeing, and with all respect,
7 it's not actually true that only England gets
8 a VIP Lane, in the sense that the VIP Lane was for the
9 four nations. So I think in this specific case what
10 happened was that the aggregate buying of PPE at that
11 scale was carried out in England, but it was basically
12 for everyone.

13 **LADY HALLETT:** Oh, I see. Thank you.

14 **A.** So I think that could have been a distinctive factor.

15 **MR WALD:** All right, I think finally now, Professor, you
16 have offered reflections, possible recommendations, as
17 we've gone along, but your box 26, your final box, which
18 is at page 161, INQ000539153, which fits on to a single
19 page, is where you address the current state and the
20 future of emergency procurement.

21 Some of this we have dealt with already, but would
22 you kindly just draw out anything that remains to be
23 said, particularly in relation to the third-from-last
24 bullet, where you have included a number of the
25 recommendations that feature in this section of your
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1 report at paragraph 393.
 2 **A.** Yes. But before we get to that one, if I may, I would
 3 like to talk about the fourth bullet from the top, which
 4 I think is fundamental criticism of the changes brought
 5 forward by the Procurement Act 23, which is to say that
 6 the Procurement Act has not changed the mechanisms for
 7 enforcement of procurement law in the applicable
 8 jurisdictions. And the same way that under the PCR we
 9 were expecting contracting authorities to publish
 10 a transparency notice and, if they didn't, there were
 11 limited routes to challenge the decision, the
 12 Procurement Act 23 very much continues in the same way.
 13 And there may be some discussion brought forward to the
 14 Inquiry on the creation, for example, of the Procurement
 15 Review Unit or other mechanisms of oversight, in my view
 16 they will not significantly make a difference. We will
 17 still have the fundamental problem that if a direct
 18 award is given without complying with transparency
 19 obligations, it's very hard to know about it, it's very
 20 hard to do anything about it.

21 So that's something I would like to highlight, that
 22 by not changing the review or remedies regime, the
 23 Procurement Act has not made a difference in the
 24 enforceability of the requirements, and what my report
 25 has shown is that the requirements were there, they were

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1 were pointing me to earlier.

2 **Q.** Yes.

3 **A.** I think that if there is to be a meaningful change in
 4 the way rules are going to be followed but also in how
 5 emergency procurement will be carried out better in the
 6 future, there is a quite long list of complicated
 7 interventions that need to take place.

8 I think the first thing is that we still don't have
 9 a fully integrated electronic procurement system that
 10 applies across the UK and I think that needs addressing
 11 as soon as possible. There are models like the Pepol(?)
 12 model, and I didn't go as far as recommending a specific
 13 approach but I think what would be required is for the
 14 government to have a very structured approach to
 15 ensuring that there is e-procurement fully rolled out,
 16 it's fully interoperable and it feeds into data and that
 17 would require funding and a dedicated change management
 18 plan, way beyond what's been put in place, for example,
 19 for the Procurement Act.

20 I think there is also significant investment that
 21 needs to be made in professionalisation in capacity
 22 building and I think the Procurement Act, for example,
 23 has shown that the approach to training in the
 24 transition from this -- the (*unclear*) rules to the new
 25 rules in the UK, which are supposed to carry

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1 just not complied with. So we could have a repeat, with
 2 the requirements being in the Procurement Act but there
 3 not being a mechanism to enforce them.

4 **Q.** What sort of mechanism did you imagine might have
 5 provided the teeth to the new Act that presumably you
 6 regard as now missing?

7 **A.** Yes, so an administrative review body, which was
 8 included as a possibility in the initial December 2020
 9 transforming public procurement Green Paper would have
 10 been in my view the best way forward, so having a review
 11 body that is established and that could have, if
 12 necessary, standby specific powers, for situations of
 13 systematic emergency, would be the best way to go. And
 14 I'm not the only one thinking that. I think there is
 15 a consensus in the practitioner community that there was
 16 a very big missed opportunity in this ether, to create
 17 in the Procurement Act in not creating
 18 an administrative-based system of review procurement
 19 decisions.

20 **Q.** Thank you, Professor. You've set out a set of
 21 recommendations at 393. They feature in this box.

22 **A.** Yes.

23 **Q.** Would you just touch on those that have not already been
 24 addressed?

25 **A.** Yes, so that's the third bullet from the bottom that you

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1 a significant cultural shift, has basically sent that
 2 the standard civil servant has been given 10 hours of
 3 self-directed e-learning as training. I just think that
 4 sort of scale of training and professionalisation is not
 5 going to improve things significantly. I think we need
 6 a lot more done in that regard.

7 I think we need more co-ordination across procuring
 8 organisations. For example, I would like to know that
 9 there is a set co-ordination mechanism between the
 10 centralised healthcare organisation in each of the
 11 nations, so that we don't have to put those systems in
 12 place when we need them and, more generally, there
 13 should be clear standby or 'break-glass' arrangements to
 14 ramp up capacity so if at some point we again face the
 15 need to buy much more than we were buying of something,
 16 who are we drawing from? Can we have those people
 17 pre-identified? Can we have them forewarned that they
 18 may be called? Can we stress test those systems as we
 19 go?

20 I think we would also need to have pre-established
 21 spend control and due diligence mechanisms in place
 22 because I think what the evidence in front of this
 23 Inquiry shows is that this was a movable feast,
 24 thresholds were raised, delegated authority was
 25 significantly increased, the conditions were maybe not

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1 always clearly set or clearly understood or clearly
2 adhered to, and I think we need a significant, more
3 structured, pre-defined approach to this issue.

4 And I think we need to have a significant
5 improvement in procurement data. This has come across
6 many times this morning but, even with the Procurement
7 Act's central digital platform, as of today there is no
8 search and as of today there is no dashboard. So it
9 could be that the data is collected but nobody can
10 access it, nobody can use it in a meaningful way and
11 I think we need a lot more to do in terms of making sure
12 that the data is open, that data can be exported and
13 used by different re-users in ways that can just not be
14 possible today.

15 In terms of re-use, I think it's also important to
16 think about looking back on data. So I think there was
17 some effort to try to identify who has historically been
18 providing PPE, if they are not current providers, but
19 that was done on the basis of very patchy sometimes
20 outdated information. I think it would make sense to
21 recommend the creation of Dynamic Purchasing Systems, or
22 now called dynamic markets, for items that are likely to
23 be needed rather than just-in-time contracts, so that
24 when the need arises, at the click of a button, all
25 those registered in the dynamic market can get a notice

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1 under or we definitely operated under during the
2 pandemic.

3 **MR WALD:** Professor, thank you. Subject to any further
4 questions from the Chair --

5 **LADY HALLETT:** I have one more.

6 **Questions from THE CHAIR**

7 **LADY HALLETT:** Going back to the Boardman Review, sorry to
8 take you back, Professor, I found online a Government
9 response to the Boardman Review, dated 7 May 2021.
10 I think that was when they said that the majority of his
11 recommendations had already been implemented but, in any
12 event, they were accepting them all and they keep the
13 Public Accounts Committee updated.

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

15 **LADY HALLETT:** Did anything happen? Did you hear anything
16 after that?

17 **A.** So I haven't heard anything. That was also a piece of
18 evidence I couldn't rely on because of Parliamentary
19 privilege. But that is the sort of explanation to say,
20 "We have implemented them", but I haven't seen any
21 follow-up reports or more detailed accounts. It could
22 be that the pack has them but they've not been
23 published.

24 **LADY HALLETT:** Thank you.

25 **MR WALD:** In that case, my Lady, Professor, thank you for

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1 to say, "We think we need lots of PPE, can you please
2 tell us what is your position now? Can you provide?"
3 And we have that pre-set, and I think it would be
4 a low-cost very significant intervention.

5 And I think this is more difficult but I think we
6 need structured mechanisms of risk mitigation and, by
7 that, what I mean is that we need to have sort of
8 suspended but susceptible of deployment mechanisms to
9 look at those risks that we are taking, and that has to
10 do with decision making, for example. It cannot be that
11 all of a sudden we are trying to come up with new ways
12 of identifying risk or mitigate for it. We should have
13 a structured approach to doing that and we should have
14 people trained to do that and, for example, using
15 standard contract clauses could go some way to that,
16 having a lot more detailed and prescriptive standard
17 contract clauses for emergency contracts, for example,
18 than we had at the beginning of the pandemic.

19 And the final one, which is probably the most
20 difficult one but probably a very important one, is that
21 I think there should be a culture of integrity and
22 committing to zero tolerance of conflicts of interest in
23 procurement. If something potentially looks like
24 a conflict of interest, it needs to be acted on rather
25 than the relatively high threshold I think we operate

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1 your written and now oral evidence. That concludes both
2 of them, and thank you very much.

3 **LADY HALLETT:** I'm really grateful to you, Professor, for
4 all the help you've given. I appreciate that it's so
5 much your specialty that you may have quite enjoyed
6 getting all this together but it's been extremely
7 helpful and I'm very grateful to you for your written
8 report and, of course, your evidence this morning.

9 Thank you very much indeed.

10 **THE WITNESS:** Thank you.

11 **LADY HALLETT:** Safe journey back to Bristol. Is that where
12 you're going?

13 **THE WITNESS:** Yes, that's right. Thank you.

14 **LADY HALLETT:** Very well, I shall return at 2.00.

15 (12.58 pm)

(The Short Adjournment)

16 (2.00 pm)

17 **LADY HALLETT:** Mr Sharma.

18 **MR SHARMA:** My Lady, the next witness is Daniel Bruce.

MR DANIEL BRUCE (sworn)

Questions from COUNSEL TO THE INQUIRY

22 **LADY HALLETT:** I hope we haven't kept you waiting, Mr Bruce.

23 **A.** Not at all.

24 **MR SHARMA:** Could we please start with your full name,
25 please?

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1 A. Daniel John Bruce.
 2 Q. Mr Bruce, you have provided a witness statement to the
 3 Inquiry, adopting the evidence of a prior witness,
 4 Mr Munro. My Lady has previously given permission for
 5 witness statements to be published, the INQ numbers for
 6 those are INQ000527634, INQ000574178.

7 For your witness statement, Mr Bruce, would you
 8 please confirm it's true to the best of your knowledge
 9 and belief?

10 A. Yes.

11 Q. Mr Bruce, you are the Chief Executive of Transparency
 12 International UK and you've held that position since
 13 October 2019?

14 A. That's correct.

15 Q. Transparency International UK is part of the UK
 16 Anti-Corruption Coalition. Could I start, please, by
 17 asking you to tell us a little bit the UK
 18 Anti-Corruption Coalition?

19 A. Yes, thank you. So the UK Anti-Corruption Coalition is
 20 an informal collaboration of civil society
 21 organisations, academia and independent experts made up
 22 of around 16 full members, and up to 30 when we include
 23 our affiliate members, broadly aligned around principles
 24 of transparency and public life, the prevention of
 25 corruption, the promotion of integrity and effective

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1 Priority Lane, and our colleagues in Open Contracting
 2 Partnership have produced a lot of analysis drawing upon
 3 data sources such as the European Union's Tenders
 4 Electronic Daily and the UK's Contracts Finder to
 5 analyse procurement turns during the pandemic, and both
 6 Chris Smith and Russell Scott have extensively used the
 7 Freedom of Information regime to seek to ascertain
 8 information about individual contracts or batches of
 9 contracts or spending that, at the point they submitted
 10 them, was not in the public domain.

11 Q. We're going to come on to some of that analysis during
 12 the course of your evidence, but could I first ask you
 13 some questions about the principles around public
 14 procurement. We've heard this morning from Professor
 15 Sanchez-Graells about issues with governance,
 16 accountability and transparency. Why should this
 17 Inquiry be concerned with those principles during the
 18 course of an emergency such as the pandemic?

19 A. Well, as I hope our written submissions shows, and the
 20 evidence that we will discuss, there was a significant
 21 collapse in the transparency regime around public
 22 contracting during the Covid-19 pandemic in the UK, and
 23 this stood out in the UK context, relative to some of
 24 its peer countries, and I know we'll come on to that
 25 later.

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1 enforcement of regimes around those areas.

2 For the purposes of the Inquiry and our work more
 3 broadly in this area, the Coalition established
 4 a Procurement Working Group, which is made up of the
 5 organisation that I lead, Transparency International UK
 6 along with the Open Contracting Partnership, Spotlight
 7 on Corruption, the Centre for Health and Public
 8 Interest, and two independent experts: Russell Scott and
 9 Chris Smith.

10 Q. As part of your work with the UKACC in relation to
 11 public procurement, you've conducted number of
 12 investigations and published a number of reports,
 13 haven't you?

14 A. That's correct. So at Transparency International UK, we
 15 produced a forensic investigation into the UK
 16 Government's first 1,000 Covid-19 contracts and our
 17 assessment of corruption risks therein. That was
 18 published in April 2021. Subsequently, we published
 19 a more extensive analysis of 5,000 contracts with
 20 a sample going out into 2023, a report entitled *Behind*
 21 *the Masks* which we published in September of last year.

22 Similarly, Spotlight on Corruption, using Freedom of
 23 Information Requests and other means has conducted
 24 various investigations, for example, into waste and loss
 25 associated with contracts that went through the High

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1 But I guess the fundamental question is: is
 2 transparency a nice to have in an emergency of this
 3 nature or is it a necessity? And we would certainly
 4 align ourselves with the latter, for a variety of
 5 reasons, perhaps foremost among which is that we would
 6 contend it leads to better procurement outcomes, and
 7 therefore it leads to a better response to the pandemic.
 8 More transparency around public spending ensures that
 9 buyers and suppliers are better connected, that there is
 10 transparency around how much things cost and, therefore,
 11 government is able to spend its money faster and better
 12 with a better transparency regime.

13 But the second consideration, which is equally
 14 important, really, is that, when a pandemic response
 15 like the UK's slips into a void of opacity around public
 16 spending and the associated mechanisms around it, there
 17 is a significant decline in public trust, and there are
 18 multiple points of data and evidence, both in our own
 19 work and that which is already in the public domain
 20 which show how the perception of corruption of public
 21 money, the perception of waste or maladministration, if
 22 not the reality, leads to declining levels of public
 23 trust in government and its response.

24 This is very marked if you look at something like in
 25 Transparency International's Corruption Perceptions

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1 Index and the data which cover the period affected by
 2 the pandemic and that's a composite indicator made up of
 3 global expert surveys of business leaders and data from
 4 the World Bank, World Economic Forum, and so on. The UK
 5 fell to its lowest level on the CPI, just over a year
 6 ago, and remains there at the moment, 71 out of 100, and
 7 the underlying data in that global dataset point to
 8 increasing levels of concern among global business
 9 leaders about the way in which public money was spent
 10 during the pandemic and a perception -- and it is
 11 perception -- that corrupt practice was fuelling
 12 diversion of public money, and I would argue that,
 13 again, that opacity, that lack of transparency, is one
 14 of the things that fuels that.

15 **Q.** You've identified in your evidence that there were
 16 shortcomings in the governance and the accountability of
 17 public contracting. What do you mean by that?

18 **A.** So the -- I mean, perhaps if I sort of talk to the
 19 guardrails that we would identify at two different
 20 levels, if you look at the statutory and common law
 21 frameworks, the relevant areas that we would have
 22 an interest in would be legislation around fraud, the
 23 Bribery Act, they are the common law offence of
 24 misconduct in public office. And then perhaps most
 25 relevant on the day-to-day basis and the pandemic

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1 deficiencies: is that the enforceability of it is very
 2 weak.

3 **LADY HALLETT:** Can I just interrupt, I'm sorry, Mr Sharma.

4 For those that are not familiar with transparency
 5 notices, is there much involved in preparing for
 6 publication a transparency notice about a contract
 7 that's been awarded?

8 **A.** Thank you, my Lady. I confess to never having prepared
 9 one myself in my line of work, so I can't comment
 10 authoritatively perhaps on the level of effort. So if
 11 I could perhaps observe -- offer some systems
 12 observations that come out of our research and our
 13 submission, which is that, in going into the pandemic,
 14 essentially the UK still had quite an analogue system
 15 that was very vulnerable to human error, and
 16 misapplication of information, and we may come on to
 17 that later, it's a slightly separate issue. But we
 18 didn't have a centralised digital common data standards
 19 system that allowed for those contract notices to be
 20 published rapidly in an easily readable, transparent
 21 way.

22 So I think my contention would be that it's as much
 23 about the mechanisms that government did or did not have
 24 in place to allow those contracts to be published
 25 rapidly, as much as it was about the time involved.

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1 response would be that the guardrails around
 2 maladministration, therefore at the time the public
 3 contracting recommendations, the codes applicable to
 4 ministers and civil servants and, more recently, the
 5 nascent work of the Covid Anti-Corruption Commissioner,
 6 but during the period of the pandemic when the public
 7 contracting regulations still applied in their form
 8 then, you could see that there was a -- again, there
 9 was -- against those regulations, there was a collapse
 10 in the transparency requirements around the publication
 11 of contract notices within 30 days, and there was this
 12 immense strain on the management of conflicts of
 13 interest.

14 And I think, if I may refer to paragraph 34 of our
 15 evidence, there's an interesting nuance in the Cabinet
 16 Office's first public procurement note in 2020, which is
 17 that which authorised the exceptional use of direct
 18 wards in the context of the emergency but, importantly,
 19 whilst those rules on the procurement process were
 20 relaxed, the rules on handling conflicts of interest
 21 should still have applied. But, in practice, I think
 22 when we take our evidence in the round, you can see how
 23 they were immensely strained and how the -- again, the
 24 transparency regime saw this significant collapse with
 25 no consequence, really. And that's one of those

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1 There is data, however, in our submission, which is
 2 quite telling, though, which is that Covid-related
 3 contract notices were subject to a materially much
 4 longer delay than all other public contracting notices
 5 during the period, and it's a very statistically
 6 significant variation, and we think it's important to
 7 get to the bottom of why that was the case.

8 **MR SHARMA:** What would you say to the suggestion that,
 9 during the course of an emergency such as the pandemic
 10 was, that the priority was to get PPE and other
 11 equipment out to the frontline, and that the preparation
 12 and publication of transparency notices and the like had
 13 to play second fiddle to it?

14 **A.** I think I'll refer to my previous answer, in that if we
 15 had a system in place that made publication of
 16 transparency notices easier, centralised, more
 17 digitised, it shouldn't even have been an issue that the
 18 UK found itself in this situation. More broadly,
 19 I would suggest that all of our evidence, and much of
 20 that already in the public domain, really challenges the
 21 narrative that all of the things that we contend went
 22 wrong with procurement and the UK's pandemic response
 23 were because Government had to act at speed and
 24 essentially it had to cut corners.

25 One of the reasons I contest that narrative is that

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1 so much what we found between us spanned months and
 2 months and months and well into 2022, with the tail end
 3 of data going into 2023, and compared to our peer
 4 countries, on matters of transparency, on matters of
 5 spend, on matters of how long emergency direct
 6 procurement was being used, the UK found itself as
 7 an outlier.

8 **Q.** So is your point that, that the emergency was deemed to
 9 last longer than it in fact did?

10 **A.** I think it is a matter of fact that emergency
 11 procurement exemptions were used for a considerably long
 12 period of time, particularly the direct award of
 13 contracts, and then those are intertwined with some of
 14 the other corruption risk factors that we identify in
 15 Transparency International's *Behind the Masks* research,
 16 but moreover, one of the checks and balances, one of the
 17 safeguards against misuse or maladministration of the
 18 emergency procurement mechanisms is the transparency
 19 regime. And again, the failure to publish contracts was
 20 a sustained problem for the entirety of our sample
 21 period. And to this day, there remain £5 billion of
 22 unpublished contracts for PPE and other supplies, you
 23 know, five years after the pandemic struck.

24 **Q.** Turning to another subject, please, corruption red flags
 25 and the 135 contracts which have been subject to

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1 than 100 days old, so called micro-suppliers, with
 2 balance sheets under 600 -- or turnover under £600,000
 3 with no prior track record. Those -- and then those
 4 contracts in addition to those factors that were
 5 channelled through the so-called high priority or
 6 VIP Lane for triaging of offers.

7 **Q.** And those red flags, I understand it, affected
 8 135 contracts. What was the total value of those
 9 contracts?

10 **A.** Yes, so for context, the contract sample size was 5,000
 11 contracts that amounted to a total of £45 billion of
 12 spending, largely on PPE and testing, and a few other
 13 areas as well. So 135 of the 5,000 as a sample is
 14 relatively small, but as a volume of spend it's very
 15 material because the 135 constitute £15 billion, so
 16 broadly a third of the sample.

17 I can't stress enough that this is the most
 18 comprehensive dataset of its kind that puts all of these
 19 contracts through the corruption risk red flag filter.
 20 It's more comprehensive dataset than the government has
 21 available to itself on this area.

22 **Q.** Of the red flags that UKACC have identified, you have
 23 described the company being relatively new, contracts
 24 being awarded without competition, the supplier being
 25 a small entity, the company being politically connected.

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1 examination by the UKACC.

2 First of all, what are the corruption red flags and
 3 why do they matter?

4 **A.** Thank you. So this is the work conducted in
 5 Transparency International's *Behind The Masks* research,
 6 and it's for a *Track and Trace* publication from
 7 April 2021.

8 We developed, drawing upon international procurement
 9 best practice from the likes of the Organisation for
 10 Economic Co-operation and Development, a list of
 11 14 different red flags against which to sift all of the
 12 government contracting data that we could find for our
 13 sample.

14 We've grouped them, perhaps if that's a more
 15 expeditious response, into themes rather than me listing
 16 all 14, if that's the appropriate way to navigate it,
 17 around risks in the procurement process, risks in the
 18 supplier profile, poor contract outcomes, so concerns
 19 around failure to deliver or past record of suppliers,
 20 and then the 14th red flag would be an additional red
 21 flag if we found contracts that had risks in all of
 22 those areas.

23 So some of the nuances that we would be looking for
 24 in those themes would be politically connected
 25 companies, they would be newly formed companies, less

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1 Given the systems that were in place at the time to look
 2 at these issues, what are the kinds of guardrails that
 3 you and UKACC would have expected to be in place in the
 4 contract progress and award system?

5 **A.** Yes, the -- probably the most relevant test that we
 6 believe should have been being applied was the
 7 eight-step due diligence process that has been referred
 8 to in previous reports, I think from government, and is
 9 referenced in our research on this area, that, in
 10 theory, should have picked up some of the types of
 11 red flags that we've identified in our research, along
 12 with the landscape of the public contract and
 13 regulations at the time, and, for example, its
 14 obligations on effective management of conflicts of
 15 interest where they're deemed to exist.

16 I think what the data show is that there are a --
 17 I mean, there is a very high number in volume of
 18 contracts that had a significant number of red flags,
 19 and it's perhaps worth stressing that, you know, the
 20 list of 135 is the three or more threshold. The top
 21 couple of dozen of contracts had up to eight red flags.

22 And those are -- I don't think it's constructive to
 23 name those companies in this context because I don't
 24 want to prejudice any other ongoing proceedings which
 25 may involve them, but there should have been multiple

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1 opportunities, using that due diligence process, using
 2 the obligations upon civil servants and indeed the
 3 politicians who were involved, as we now know, in
 4 referrals, to identify some of these red flags that
 5 should have probably caused a contract to stop. You
 6 know, examples being -- you know, it's something with an
 7 opaque ownership structure, that's non-competitively
 8 awarded, that's clearly brand new, there's no former
 9 track record and it would appear that that contract is
 10 only being placed on the desk of a civil servant because
 11 it's come through the High Priority Lane.

12 There are multiple examples in the underlying
 13 dataset where those things should have been stopped.
 14 It's not clear to us and we haven't been able to
 15 establish why they weren't.

16 **Q.** You, via UKACC, have conducted a large volume of
 17 research on Contracts Finder. Could you please help us
 18 with what Contracts Finder is?

19 **A.** So Contracts Finder is one of the UK Government's
 20 publication tools and, in the context of the pandemic,
 21 it should be looked at alongside TED which is Tenders
 22 Electronic Daily, which was the centralised EU contracts
 23 publication platform. In both cases, the data are
 24 rarely beautifully complete, so the analysis that we've
 25 produced through TI, through Open Contracting

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1 contract was actually billions, or vice versa and,
 2 again, we assume human error. The Ministry of Defence
 3 had three or four different departmental identifiers in
 4 the dataset, sometimes it's just a spelling error,
 5 swapping out the "C" for an "S", or something like that.
 6 These might seem like slightly geeky, technical points
 7 to be raising but they're incredibly important when it
 8 comes to us having a public spending transparency
 9 repository of information that we can rely upon that
 10 builds trust and, again, coming back to my earlier
 11 point, is usable for government and suppliers.

12 **Q.** Can I turn, please, to some international comparisons
 13 which the UKACC has done with the Open Contracting
 14 Partnership. We heard evidence from Professor
 15 Sanchez-Graells this morning that he hadn't been able to
 16 find another country with a High Priority Lane or a High
 17 Priority Lane-like system. Have you been able to find
 18 anything like that in your research?

19 **A.** No. We come to the same conclusion as the professor.
 20 We crosschecked peer countries, we consulted with
 21 Transparency International chapters in around 100 other
 22 countries, Open Contracting Partnership consulted with
 23 its network in 30 countries and it appears that the High
 24 Priority Lane, so-called VIP Lane was a completely
 25 unique feature to the UK's pandemic response.

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1 Partnership and our coalition, needs to be understood
 2 with that cautionary note. One of the challenges that
 3 we saw in analysing data from Contracts Finder and
 4 Tenders Electronic Daily in this crossover coming out of
 5 the EU period was a lot of contract duplication which
 6 was then further exacerbated by a lot of human error
 7 that I've referred to, in terms of the contract
 8 information that was put into Contracts Finder.

9 Taken together, when we looked at our sample of
 10 5,000, if we'd just added all of those together and not
 11 manually sifted out all of the duplication, it actually
 12 looks like government spent £30 billion more than it had
 13 on the pandemic response, so that's perhaps a separate
 14 point around the sort of cleanliness of data and how we
 15 action that going forward, but it's important in the
 16 context of understanding how fragmented and chaotic
 17 pandemic-related procurement data is on Contracts Finder
 18 and elsewhere.

19 **Q.** So UKACC found inflated contract values, missing data,
 20 misspelt contractor names and other inaccuracies. Has
 21 that made your analysis of the contract data more
 22 difficult?

23 **A.** Oh, yes, undoubtedly. And when we talk about inflated
 24 contract values, sometimes the differences that we're
 25 talking about are an official typing millions when the

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1 **Q.** You refer in your witness statement to a World Bank
 2 survey of 103 countries and an assessment of the
 3 accountability and transparency standards in those
 4 countries. How does the UK compare to those 103
 5 countries?

6 **A.** I think almost exclusively in the World Bank survey, all
 7 countries experienced degrees of challenges with their
 8 pandemic procurement, in what was an incredibly hot
 9 market. There were pockets of corruption scandal in
 10 other peer countries, Germany, for example, various sort
 11 of political scandals around contracts awarded to those
 12 connected to government, particularly again in those
 13 earlier weeks and months of the crisis.

14 Where the UK stands out is the length of time, as
 15 I've laboured before, that many of the measures that
 16 were being used, many of the affronts to the
 17 transparency regime and the spirit of the public
 18 contracting regulations were sustained for, but also the
 19 manner in which, relative to its European peers, the UK
 20 procured an extraordinarily larger amount of PPE and
 21 other supplies and, again, relied very, very heavily by
 22 contract volume on the use of direct awards in a way
 23 that was only replicated in terms of the European peers
 24 in places like Cyprus and Luxembourg. So much smaller
 25 nations with a collective population of only around

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1 2 million.

2 The other thing that the UK seemed to fail to do,
3 relative to other peer countries -- or similar
4 comparable countries -- was to stop and learn as it
5 went. Lithuania, for example, was having difficulties
6 with its procurement, was struggling with price
7 inflation, was struggling to keep on top of its
8 transparency obligations, and around about the middle of
9 2020 did a sort of stop and review exercise to make some
10 adjustments to the public transparency regime to
11 stocktake on pricing data, and so on, whereas the UK at
12 that point, when you look at the data which speak for
13 themselves in our assessment, still look like a runaway
14 train of spending and opacity.

15 **Q.** Can I just pick up on two points which you've made,
16 perhaps with the assistance of some graphics. Could we
17 have up, please, INQ000474994, and the bottom of page 4.
18 Thank you.

19 If we can just zoom into that graphic at the bottom,
20 this is a chart about the proportion of direct Covid
21 contract award notices by country, 2020 to 2021. The
22 countries are listed on the bottom: Germany, Spain,
23 France, Italy, Netherlands, Poland and then the UK on
24 the right-hand side. In terms of direct contract award
25 notices, the UK seems to award, by direct contract

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1 colleagues at OCP could find for all countries, again
2 using data from Tenders Electronic Daily and Contracts
3 Finder.

4 I mean, I think the data speak for themselves in
5 terms of what this is telling us, but there was
6 something particularly unique about the amount of money
7 that the UK spent on Covid contracting relative, again,
8 to peer countries, many with similar sized populations
9 in Europe.

10 I think it's really important to look at this data
11 in parallel with the other issues that we've already
12 discussed as well, as we start to sort of build
13 a picture of the UK's response. So here you have this
14 enormous variance in the amount of public money that is
15 being spent, with that enormous variance in the use of
16 direct awards that we've just seen, with a VIP Lane that
17 was completely unique to the UK, and with a notable
18 collapse in public transparency around public spending,
19 all into this sort of melting pot of issues which
20 characterised the UK's response, and I think leads to
21 some of the -- clearly the wider questions that this
22 Inquiry will need to seek to answer over the weeks
23 ahead.

24 **Q.** One of the comparisons which you draw is between the UK
25 and Canada on the approach to the call to arms being

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1 award, about double that of Germany, doesn't it?

2 **A.** Yes, that's absolutely correct. The -- perhaps the most
3 comparable dataset within this, which is where
4 colleagues at OCP started with this analysis, is to
5 compare Germany, the UK, France and Poland on the basis
6 of similar levels of size of population because, as
7 I mentioned earlier, smaller nation states like Cyprus
8 and Luxembourg, it can be a bit distorting if you've got
9 a smaller population.

10 So relative to those immediate peers and this
11 slightly wider sample, which we see in the evidence,
12 yes, the UK is very substantially, over the period --
13 I believe this data, yes, runs to the end of 2021, so
14 again, a long sample from the pandemic, is relying very
15 heavily on the use of direct awards which in itself is
16 one of the corruption red-flag risks that we would
17 identify.

18 **Q.** Another graphic, if we may, please, to deal with your
19 second point. INQ000474994, the graph on the top of
20 page 6, please. This is UKACC's analysis of the Covid
21 contract notices cumulative total. At the top
22 an outlier by any standard is the UK, with all the other
23 countries, Germany, Spain, France, Italy and Poland,
24 down at the bottom.

25 **A.** Exactly. This is all Covid-related contracts that my

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1 a public call for the provision of healthcare equipment
2 and supplies. Could you help us, please, with the
3 differences between the way that the UK approached that
4 problem of open sourcing procurement and the way that
5 Canada dealt with the same issue?

6 **A.** Canada, I suppose, going into the pandemic was already
7 greatly advantaged by the fact that it had a mature,
8 well resourced, digitally savvy centralised government
9 procurement service, for want of a better term. It's
10 called Buy and Sell Canada. So that was there and
11 poised and ready to go. With that infrastructure, what
12 Canada was able to do was to take an approach that went
13 to market for PPE and other products, testing, and so
14 on, with very clear well publicised, well detailed
15 specifications of, "This is what we need as government
16 through our centralised procurement platform", and was
17 able to go to market with that very transparently, very
18 quickly and had a system in place that allowed suppliers
19 to then put in their offers and their bids that was
20 based upon an approach, "This is what we need, can you
21 fill this need, and how much is it going to cost?", with
22 transparency baked into that approach and publication
23 with as much of that data as possible throughout.

24 The UK's approach feels in many ways inverse, in
25 that the so called call to arms for PPE and other

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1 supplies felt like a "Tell us what you've got and we'll
2 work out what we want to buy", leading to this
3 overwhelming volume of offers that the government was
4 struggling with just managing the data for in those
5 early weeks and months of the crisis, and therefore the
6 introduction of measures to get through all of that
7 data, which, in our assessment only increased the risks
8 of corruption or maladministration, rather than reducing
9 them, whereas Canada was sort of tanking along, buying
10 the things it wanted to buy, and there was this
11 marketplace, if you like, where buyers and suppliers
12 could see each other.

13 To come back to my opening remarks, that ability for
14 good transparency to lead to better procurement and
15 better buying capacity at the outset was greatly
16 advantaged by systems such as this.

17 **Q.** Would you agree that the approach, at least from your
18 analysis in the UK, was to say that "Tell us what you've
19 got" was the UK's approach, and "This what we need", in
20 short, was Canada's approach?

21 **A.** Yes.

22 **Q.** What, from your analysis, do you think could be learned
23 in this country and in the devolved administrations
24 about the approach to procurement from the experience of
25 Canada?

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1 "cumbersome"? In what ways was it cumbersome?
2 **A.** So the UK generally relies on closed frameworks rather
3 than open frameworks, and I think this might be behind
4 some of the challenges that SCCL, Supply Chain Services,
5 experienced and seemingly led to its kind of notional
6 collapse early on in the pandemic, in that,
7 periodically, the UK Government will go to a market in
8 any department for suppliers of X or Y, so that there is
9 a pre-approved bench of companies who can provide the
10 types of things that that department needs to procure,
11 and then that -- that framework is locked off for a few
12 years. Usually you get your framework agreement in
13 place as a supplier, it -- you know, it protects you in
14 that select group for a few years. It doesn't normally
15 set pricing information, that would come later at the
16 call-off point if government was to go to its framework
17 for that particular area.

18 It's very rare that government adds in suppliers to
19 its frameworks, whereas mini or open frameworks allow
20 that to happen quickly and, as we can see in places like
21 Paraguay and Germany, they could be stood up quite
22 quickly in the context of the pandemic.

23 **LADY HALLETT:** Sorry, I'm not following. The standard
24 framework that we use, every so often we're going to
25 recognise you, Mr Supplier or Mrs Supplier, and you go

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1 **A.** Well, I think at an overarching level, the need for
2 investment in procurement expertise that is centralised
3 and becomes a more professional cross-government
4 function, in and of itself, the need for digitised
5 platforms and tools that work, and that are fit for
6 purpose, both in terms of publishing contract
7 opportunities and then the follow-up transparency data
8 that we have discussed. And a few other areas as well,
9 which are evident in Canada and other countries, such as
10 Germany, Lithuania again, Paraguay had much innovation
11 in its procurement response.

12 Tools such as the use of mini frameworks, which the
13 UK doesn't use, but the ability to quickly put together
14 groups of properly screened suppliers. Germany had
15 an approach where it did this and had a sort of
16 take-it-or-leave-it approach on pricing, where the
17 Federal Government would say, "Well, that's what we're
18 willing to pay for this, and let's leave that standing
19 there for when we need it."

20 The framework situation in the UK is much more
21 cumbersome and is perhaps one of the underlying
22 challenges that led into the barriers that government
23 was facing when we went into the pandemic. I know there
24 is a --

25 **Q.** Pause there for a moment. What do you mean by

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1 onto our list. The advantage there is that they've
2 already been through a process of validation. Do you
3 not lose that established process of validation if you
4 have more open frameworks, some mini frameworks that
5 you've just been describing?

6 **A.** Thank you, my Lady. So your interpretation of my
7 evidence is correct. I -- no, I don't think -- I don't
8 think we would contend that that is the case. I think
9 those things we can see, from some of the evidence, can
10 co-exist side by side. Much of this, for the UK,
11 though, would be resolved with the other procurement
12 recommendations that we and others have made in terms of
13 systems and investment and training, and different types
14 of mechanisms beyond these cumbersome frameworks but
15 I think that, again, you can just see in other
16 international comparisons that other countries came up
17 with nimble, effective, solutions, faster and quicker
18 that cost less.

19 **LADY HALLETT:** Can I just -- sorry to pursue again. Going
20 back to the point you made about Canada and its much,
21 you said, digitally savvy system for data analysis,
22 whenever I make a recommendation in a time of
23 constrained resources I always have to try and find
24 a way whereupon it could be something that could be used
25 in peacetime or it's something that will be spent to

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1 save. The professor earlier suggested this could be
2 quite expensive if this were a recommendation: better
3 training, better data system. Have you anything to say
4 that would help me make a recommendation that might be
5 persuasive for a government faced with difficult
6 resources?

7 **A.** I'm afraid I can only hypothesise, my Lady.

8 Our suggestion would be that we would agree with the
9 professor that better procurement systems need
10 investment and it will need spending investment in
11 systems technology and training in particular. The
12 benefits that -- and here's my hypothesis -- the
13 benefits that should flow from that would be delivered
14 in the years that followed that investment. And, again,
15 not all of the countries in the OCP sample necessarily
16 have the best digital platforms, but I just come back to
17 that pattern of massive spending by the UK Government
18 using the tools that it did or didn't have at its
19 disposal in the pandemic, and I think that, for me, is
20 a data point alone enough to say that, actually, if this
21 were to happen again or some other crisis of this
22 magnitude, would we really want to have the UK as such
23 an outlier on how much money it spent?

24 So again, I'm hypothesising, forgive me, but I think
25 the returns come in later years.

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1 it relates to procurement for government departments.

2 There are other areas of Nigel Boardman's
3 recommendations which remain unaddressed and which are
4 still salient today. One of them comes back to the
5 point that we were just discussing around training, you
6 know, at the minute many civil servants have a sort of
7 mandatory 10 hours online training on procurement and
8 conflict of interest management and this needs to be
9 more substantial going forward.

10 And there are various other sort of smaller details
11 around getting alignment between the way that conflicts
12 of interest are published and declared and, again,
13 introducing more transparency into that regime. So one
14 of the recommendations we make, which builds upon Nigel
15 Boardman's recommendations, is that when public
16 contracts are being entered into, it shouldn't be just
17 enough in future to confirm that a conflict of interest
18 assessment has been conducted, but that that assessment
19 should be published as part of the disclosure regime,
20 for example.

21 And perhaps finally on this point, our
22 recommendations, I believe, are aligned in that we
23 suggest that suppliers should have matching conflict of
24 interest policies and management, as well as the --
25 those within the government department that they are

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1 **LADY HALLETT:** Thank you.

2 **MR SHARMA:** Can I turn, please, to just a few
3 recommendations which the UKACC makes, in addition to
4 investment in a procurement system and development of
5 procurement professionals.

6 One of them relates to conflicts of interest and
7 an observation you make about the implementation of the
8 recommendations of the Boardman Review, which we heard
9 about earlier this morning. Could you help us, please,
10 with what UKACC's view is of the implementation of
11 recommendations about conflicts of interest from the
12 Boardman Review?

13 **A.** Thank you. Our understanding at the time was that
14 government accepted the two sets of Boardman
15 recommendations in full. They haven't yet been
16 implemented in full, and perhaps the most salient point
17 in this context is the conflicts of interest policy
18 work. Only two of many more government departments had
19 overhauled their conflict of interest policy in light of
20 the Boardman recommendations. The rest, last time our
21 coalition checked, remained unaddressed.

22 I think we would go further in our recommendations
23 and suggest that you don't have a department-by-
24 department conflict of interest policy; you just have
25 a single policy for conflict of interest management as

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1 contracting with.

2 **MR SHARMA:** Mr Bruce, thank you.

3 My Lady, unless you have any further questions?

4 **Questions from THE CHAIR**

5 **LADY HALLETT:** No, just another question, Mr Bruce.

6 Going back to your point about companies that have
7 really only just been set up, as a non-expert in
8 procurement, I would expect that any form or -- I gather
9 it was a SurveyMonkey result, would -- almost the very
10 first question was: when was your company established?
11 And that if it was within the last few months, I'd be
12 very wary. Do you know if that's a principle that
13 anybody thought of? It just seems so obvious.

14 **A.** I don't know if it was on the SurveyMonkey because
15 I didn't see the SurveyMonkey that was used for
16 gathering contract data. I mean, I think it's part of
17 the wider landscape of the attitude towards these
18 controls and, if -- you know, if -- of public spending
19 in the pandemic, and if there is, you know, one aspect
20 of the UK Government's response which, in our
21 assessment, was the most egregious, it was the creation
22 of the High Priority Lane, the so-called VIP Lane.

23 You know, as I've said, other countries had their
24 pockets of scandal. The UK Government, in essence,
25 ended up creating a system that invited corruption risk

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1 that flew in the face of all international best practice
 2 and threw the rulebook out of the window. It must never
 3 happen again.
 4 The then Labour Party in opposition suggested they
 5 would legislate to make such VIP Lanes unlawful in the
 6 new Procurement Act. That hasn't happened yet but, if
 7 we look at actually the loss and the write-offs
 8 associated with the High Priority Lane, contracts that
 9 were 80% more expensive for PPE for all companies going
 10 through the High Priority Lane, £1 billion, representing
 11 59% of spent on PPE written off as not fit for purpose,
 12 that -- if I can implore one thing, that is the biggest
 13 lesson that we must learn from the UK's approach to
 14 procurement because all of the details around the
 15 information that was being collected, or not able to be
 16 collected and then the collapse in transparency was only
 17 further exacerbated by the creation of the VIP Lane.

18 **LADY HALLETT:** Message received.

19 **THE WITNESS:** Thank you, my Lady.

20 **LADY HALLETT:** Thank you very much indeed -- oh, no, we've
 21 got Mr Weatherby.

22 I think you've got some questions?

23 **MR WEATHERBY:** Yes.

24 **LADY HALLETT:** Sorry.

25 Mr Weatherby has some questions for you.

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1 germane of the High Priority Lane approach, and in the
 2 context of my remarks a moment ago that we think that
 3 that approach should never be repeated again in the UK,
 4 we would rather you didn't have to retrofit such
 5 controls to such an approach because we'd rather it
 6 didn't exist.

7 **Q.** Yes. My question was rather prefaced on that basis, but
 8 thank you for clarifying that, and it's the same caveat
 9 here. But if yes, do you consider that in practical
 10 terms referrers should have been required to disclose
 11 any conflicts of interest at the point of making the
 12 referrals to the High Priority Lane? Same caveat.

13 **A.** Again, the same caveat. I mean, in hindsight and
 14 retrospect, yes, in the context to that system having
 15 been chosen to be the system that was used.

16 **MR WEATHERBY:** Indeed. Thank you very much.

17 **THE WITNESS:** Thank you.

18 **LADY HALLETT:** Thank you, Mr Weatherby.

19 That completes the questions that we have for you,
 20 Mr Bruce. Thank you very much indeed to you and to your
 21 colleague for the written statements you've prepared,
 22 and thank you so much for all your help today. You're
 23 a very good advocate for your cause, if I may say so.

24 **THE WITNESS:** Thank you, my Lady.

25 **LADY HALLETT:** Thank you.

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Questions from MR WEATHERBY KC

1 **MR WEATHERBY:** Thank you.

2 I ask questions on behalf of Covid Bereaved Families
 3 for Justice UK. Just three short points on something
 4 you nearly finished on, conflicts of interest.

5 So in your witness statement, or the statement that
 6 you've adopted -- for the record, paragraph 51-- it's
 7 stated that:

8 "The UK Government's approach to emergency
 9 contracting had effectively turned ordinary rules on
 10 handling conflicts of interest on their head. Personal
 11 relationships resulted in suppliers going through the
 12 High Priority Lane rather than being used as grounds to
 13 more carefully scrutinise suppliers and record
 14 decision-making processes."

15 So my questions are, firstly, do you consider that
 16 commercial or personal links between a referrer of an
 17 offer and a supplier in the VIP Lane were, in principle,
 18 capable of constituting a conflict of interest?

19 **A.** Yes, we do.

20 **Q.** Do you consider that ensuring that a fair system of
 21 procurement required proactive disclosures of conflicts
 22 of interest by both referrers as well as suppliers?

23 **A.** Well, I think that's a caveated "yes", because the
 24 language of "referrers" and "suppliers" is, again,

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1 I think we'll carry on, Mr Sharma. It's a bit early
 2 to take the break now.

3 If you'd like to take the oath.

SIR GARETH RHYS WILLIAMS (sworn)

Questions from LEAD COUNSEL TO THE INQUIRY FOR MODULE 5

5 **LADY HALLETT:** I hope you were warned you would be on later
 6 this afternoon?

7 **THE WITNESS:** No, not a problem.

8 **LADY HALLETT:** Sorry to keep you waiting.

9 **MR WALD:** Could you start, please, by stating your full name
 10 for the Inquiry.

11 **A.** Yes, Gareth Rhys Williams.

12 **Q.** Is that how you would prefer to be referred to,
 13 Sir Gareth?

14 **A.** Yes, that's fine, thank you.

15 **LADY HALLETT:** Sorry, I've been through this before with
 16 another witness. Was the question meant to be whether
 17 you want to be "Sir Gareth"?

18 **THE WITNESS:** Yes.

19 **LADY HALLETT:** No, you accept and you get called
 20 "Sir Gareth". I'm afraid I pointed that out to
 21 Sir Christopher Wormald.

22 **THE WITNESS:** Then Sir Gareth it is.

23 **MR WALD:** Sir Gareth, you have, and we are grateful for it,
 24 provided for the Inquiry a number of witness statements:

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1 a corporate Cabinet Office witness statement dated
2 5 July, INQ000497031; a witness statement dated
3 14 January 2025, which is INQ000536362; and
4 INQ000535017, a further witness statement dated
5 23 January 2025; is that right?

6 **A.** Yes, for fullness, there was a -- I did one also for
7 Module 1, but that was much smaller, that was more of
8 a summary for everybody.

9 **Q.** Yes. Those are the three that we're focused on within
10 this module.

11 **A.** Yes.

12 **Q.** Can you confirm, and I believe you have done with your
13 signature, that the contents of those statements are
14 true to the best of your knowledge and belief?

15 **A.** They are.

16 **Q.** And there are, in addition, number of statements that
17 have been provided to us by Clare Gibbs, a corporate
18 statement on behalf the Crown Commercial Service,
19 INQ000528389, dated 20 December 2024, and an additional
20 statement by Clare Gibbs INQ000569124, dated
21 28 January 2025. Can you confirm that you've read those
22 statements?

23 **A.** Yes, I think the first that you mentioned was a Cabinet
24 Office statement not a CCS statement. Mrs Gibbs took
25 over after I left the Civil Service.

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1 **A.** Indeed.

2 **Q.** But in the meantime, would you, if you wouldn't mind,
3 very briefly explain what is meant by those terms,
4 "just-in-time operations" and "continuous improvement"?

5 **A.** Well, we'll take the latter first, and I think it is an
6 ethos I've tried to engender in the commercial function.
7 Continuous improvement is vital to get better and better
8 and better and take every opportunity to learn things
9 across a system, and that goes to the heart of the way
10 that the commercial function has been structured up
11 until now. I don't know if you're going to come back to
12 that.

13 In terms of just-in-time, that's a study --
14 a methodology initiated in Japan about driving out waste
15 out of a production system or an office system really by
16 focusing on not making more than you need, moving it as
17 fast as you can, and having, you know, the least
18 inventory within a factory. That is slightly different
19 from least inventory in a finished goods environment.
20 So, to take an easy example, cars. Factories are very
21 just-in-time, but we've all seen plenty of garages with
22 lots of cars on the forecourt.

23 So I spent my early career working on manufacturing
24 systems, how to make things quickly and scale things up
25 quickly. But that's perhaps the relevant bit.

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1 **LADY HALLETT:** Sir Gareth, can I apologise, I should have
2 checked my facts, you didn't accept a knighthood, did
3 you?

4 **THE WITNESS:** I would never have dreamt to --

5 **LADY HALLETT:** I'm really sorry that I caused that
6 confusion. Please forgive me.

7 **THE WITNESS:** I'd never have dreamt to --

8 **MR WALD:** Where are we left?

9 **LADY HALLETT:** We are left -- if you're a baronet, I still
10 think you're Sir Gareth, but it's certainly up to the
11 witness.

12 **THE WITNESS:** Whatever. I'm here.

13 **LADY HALLETT:** It'll teach me to be a pedant, won't it,
14 really?

15 **MR WALD:** You left the Cabinet Office in 2024 and are now
16 the chair of National Highways.

17 **A.** Correct.

18 **Q.** You're a chartered engineer by background with a wealth
19 of experience managing a variety of companies and, more
20 specifically, in so-called just-in-time operations and
21 continuous improvement?

22 **A.** Yes.

23 **Q.** That's right. Very briefly -- we'll turn to the concept
24 of just-in-time operations next week, with a further
25 expert witness that's appearing on Monday.

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1 **Q.** Thank you. Moving forward, then, to the pandemic.
2 During the pandemic you were the Government Chief
3 Commercial Officer, weren't you?

4 **A.** Correct.

5 **Q.** And you held that position between March 2016 up until
6 July 2024?

7 **A.** Correct.

8 **Q.** Yes. What did that role entail, in brief terms, if you
9 would?

10 **A.** So two sides to that. The first side is I was one of
11 the -- what is called the "functional leader",
12 introduced into government in order to try to drive
13 professionalism, in my case in the commercial function,
14 but there are colleagues in Projects, colleagues in
15 Digital, colleagues in HR, doing much the same. That's
16 about, how do we recruit better people? How do we train
17 them? How do we retain them?

18 And back to sort of the "continuous improvement"
19 point that Mr Wald raised: how do we learn from each
20 other so we don't make the same mistake again? Or how
21 do we learn from each other by taking good practice in
22 one part of the government network and spread it around
23 the others?

24 Our government is hugely siloed, you've probably
25 heard that before, in that things don't easily move from

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1 one department to another.

2 **Q.** We'll come on to that --

3 **A.** Capability is one side of the role, and the other side
4 of the role is really, I was the face of government
5 towards its suppliers. And of course, I mean, we've had
6 tens of thousands of suppliers. So the more senior
7 suppliers, you know, I had a relationship with and I was
8 brought into senior fora if there was a question of how
9 would the supplier base, how would industry, feel about
10 dot, dot, dot.

11 **Q.** I want to come on to the Government Commercial Function.

12 We've heard in previous modules about the role of
13 Cabinet Office in government decision making generally
14 and in respect of civil emergencies. In this module,
15 with your help, we want to focus on the Government
16 Commercial Function.

17 It's a cross-government network of staff based in
18 all departments who procure or support the procurement
19 of goods and services for the public sector amongst
20 other things; is that right?

21 **A.** Yes. Would you like me to expand on the structure?

22 **Q.** Well, I'm going to ask you to do that in a moment by
23 reference to a graph that is included within your
24 evidence.

25 Before I do that, I just want to get a sense of the
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1 And that structure is similar to what you see in the
2 Government Legal Department, in that they have a central
3 group, but then people deployed in each one, except I --
4 subject to everyone in this room correcting me, GLD are
5 all of lawyers, whereas the commercial function is just
6 the GCO, this senior 1,500, it was about 1,000 at the
7 time of the pandemic, are just the leadership grades
8 of it.

9 **Q.** Now, I promised I'd come to and display, if I can, one
10 of the visualisations, the graphs within your evidence.

11 It's INQ000497031, which features at page 32 of your
12 corporate statement, paragraph 220. Let's see if we can
13 get that up on the screen now. And whether it might
14 assist. Were you thinking of that a moment ago?

15 **A.** That's what I was starting to ... yes.

16 **Q.** Yes. Does this help us understand anything further than
17 that which you've already explained?

18 **A.** Yes, it does a little bit. And the red -- so the blue,
19 the Government Commercial Function, 6,000 people.
20 Everything on the slide, my Lady. The red, the GCO, the
21 management layer.

22 So it's a graphic. It's -- you know, it doesn't
23 cover just those -- the words that are inside the red
24 label. I'm trying to indicate, you know, the seniority
25 of the people.
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1 scale of it in terms of staffing.

2 The Cabinet Office employs a senior cadre of the
3 Government Commercial Function numbering about 1,500
4 staff; is that right?

5 **A.** Yes. So of the, roughly speaking, 6,000 people in the
6 commercial function across central government -- and we
7 perhaps need to come back to delineate that, because at
8 the time, well, and as of now, it doesn't formally
9 include the NHS, and at the time of the pandemic it
10 didn't include some other arms length bodies that have
11 since been moved into it -- but of that total 6,000 who
12 are -- 4,500 broadly are employed directly in their
13 departments like any other civil servant working in
14 their department. There's the management layer from
15 what's called grade 7 and upwards -- I don't know if
16 you'd like me to explain that -- but from grade 7
17 upwards are contracted centrally, albeit they actually
18 work in the Ministry of Justice or in the Home Office
19 or, in this case, the DHSC. So they are formally
20 employed by the Cabinet Office and, therefore, in the
21 structure that I led, and therefore that is the glue
22 that has enabled us to drive through common training,
23 common methods, learning from each other, which
24 otherwise, in a siloed structure such as we have in
25 government, is very, very difficult to execute.
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1 I think what is important here to understand perhaps
2 for the Inquiry is who does what, because the Cabinet
3 Office is a complicated word in the procurement
4 structure. So if it -- is it useful to take you through
5 the three columns?

6 **Q.** Well, it would be to the extent that it will help us
7 understand this issue of siloing that you mentioned
8 a moment ago.

9 **A.** Okay. So in the department -- so on the left-hand
10 column -- the Home Office buys very different things
11 from the Ministry of Defence, different from the
12 Ministry of Justice. Those teams should buy the things
13 that are specific to them: prisons, or warships, or
14 whatever it is. Other people should not be buying
15 those. That should be for the obvious department.

16 The Crown Commercial Service, in the middle, which
17 is also an ALB of the Cabinet Office, hangs off the
18 Cabinet Office, puts in place the frameworks that you've
19 heard a lot about today for what are called common goods
20 in services, things that one would normally expect
21 everybody would want to buy, and the obvious example is
22 buildings.

23 Everybody has buildings. It makes no sense at all
24 for 20-odd departments each to develop a skill in
25 buildings procurement. Much better that CCS, Crown
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1 Commercial Service, generate a framework and then
2 everyone else pulls off from that. And you've heard
3 about similar -- well, we can talk about the NHS
4 structure in a second if that's helpful.

5 In the Cabinet Office, there are two things. There
6 are the four central -- or five central teams, we've
7 rationalised them since, that lent people that were --
8 as has been discussed today, and we'll probably get back
9 into, who were then deployed out into departments to
10 staff the PPE team, the test and trace team and the
11 ventilator team. But there is a version of the
12 left-hand column because the Cabinet Office of course
13 has its own procurement team that does not work for
14 me -- or it works for me in the functional sense, but it
15 works with the Permanent Secretary for the ministers in
16 the Cabinet Office. So there included in the left-hand
17 column.

18 Is that helpful?

19 **Q.** It is. I want to move us, with that helpful background,
20 to the role of the Cabinet Office in PPE procurement.
21 Can we move in to that now?

22 Now, if I'm right -- I'm right, aren't I, that
23 whilst it was a DHSC that was the procuring department
24 for PPE, it was the Cabinet Office staff that had close
25 involvement?

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1 departments where I could -- I was able to encourage
2 them to be released.

3 And between them, and staff from the -- commercial
4 staff from the NHS, that's what made up the PPE Cell
5 team.

6 **Q.** Mr Rhys Williams, you referred to the professor. You're
7 talking about Professor Sanchez-Graells of this morning?

8 **A.** Yes, sorry. Yes.

9 **Q.** You heard his evidence? Did you hear his evidence?

10 **A.** Yes.

11 **Q.** Oh good, because I'm going to come back to it. It's
12 useful to know you heard it. I want first, though, to
13 ask you about the Complex Transactions Team and how that
14 fits into the organogram that you've been explaining, to
15 us. There was such a team, wasn't there, which
16 assisted? Now, in brief terms what was the team for and
17 what did it do?

18 **A.** Okay, they were in the right-hand column of the graph
19 you just put up somewhere in that column. So they,
20 they're a team of 35-ish plus or minus, of senior
21 experienced commercial staff, so generally, at what's
22 called senior commercial -- senior civil servant level 1
23 or the equivalent in the GCO structure. They didn't
24 have lots of people working for them. These are
25 an internal consultancy arm that we would essentially

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1 **A.** Yes. And that's because the -- when we think about
2 Covid procurement, my Lady, we need to recognise that
3 these are "and" procurements. All the other underlying
4 work of government needed to continue happening,
5 prisons, IT buying, whatever it was, schools,
6 buildings -- whatever it was. That still needed to
7 happen. And for reasons that you heard earlier, SCCL
8 ran out of staff, IT and so on. DH had been through
9 a -- as I recall, a pretty savage downsizing a couple of
10 years beforehand, and that slightly goes to the staffing
11 issues that the professor talked about in SCCL. We
12 might come back to that.

13 So the only pool of spare people that we had, apart
14 from the people I could frankly ask for and encourage,
15 colleagues in departments that I felt would be less
16 loaded than others, was the Complex Transactions Team
17 and, to a lesser extent, the Markets and Suppliers team,
18 who worked directly for me but in the Cabinet Office,
19 and we were able to -- (a) they're very high-level
20 people, very experienced, skillful. We were able to
21 move them over immediately, because they worked for me
22 and I could just do that and take them away from
23 whatever else they were doing, supplemented by resource
24 from the MoD, which I couldn't directly control but they
25 were good to volunteer, DfE, and other government

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1 rent out, departments could ask for help, for things
2 that -- a dispute, a complex negotiation, a complex
3 piece of strategy, where it would make no economic sense
4 for the government -- for that government department to
5 have that resource on hand, year in, year out.

6 If they needed it for the six months, they could
7 borrow and pay for one of the people in the CTT in order
8 to support that and then, at the end of that assignment,
9 those people would then come back into the Cabinet
10 Office pool. In the meanwhile, they would be working in
11 the Home Office or the Department for Education or
12 whoever it was, under the direction of the Local
13 Commercial Director or Chief Operating Officer in
14 whichever department was hiring them.

15 **Q.** Cabinet Office staff were involved in setting up the PPE
16 Buy Cell, also known as the Parallel Supply Chain,
17 weren't they?

18 **A.** Yes.

19 **Q.** We heard something about that earlier today with
20 Professor Sanchez-Graells. During the course of the
21 pandemic, you were also involved in a number of key
22 decisions and commissioned reviews regarding the High
23 Priority Lane, prices and processes, weren't you?

24 **A.** Yes.

25 **Q.** Examples of those are the two GIAA reports 1 and 2?

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1 **A.** Yes. During that summer, there was increasing noise in
 2 the press about these PPE contracts, what's going on
 3 and, as I cover in, I think, one of my submissions to
 4 you, my Lady, some of those were placed with -- some of
 5 those contracts were placed with companies that, on the
 6 face of it, you look at and you go, "Why would you buy
 7 PPE from a -- you know, a pest eradication company?"
 8 Well, because actually those people do that sort of work
 9 wear PPE and so that's why they're able to help. So
 10 there were a number of issues like that, questions on
 11 pricing, questions on so on and so forth, and
 12 I thought -- I, at the time -- and I didn't think
 13 anything was going wrong but, you know, these things
 14 need checking.

15 So I asked -- I was not allowed to commission GIAA
 16 myself but I persuaded Alex Chisholm, who was then the
 17 Permanent Secretary, that he should commission GIAA to
 18 look at -- and I said, "Pick six contracts that have
 19 been in the news, you choose, dive into them, discover
 20 what you can".

21 When they did that, I said, "Fine, okay", we'll
 22 perhaps come on to their findings in a minute, and
 23 I asked them to do another six.

24 **Q.** Well, not in a minute but we will come on to them.

25 **A.** Yes. I also commissioned -- the first thing

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1 **A.** No, I had no input on distribution at all. So --

2 **Q.** Sourcing and distribution?

3 **A.** Um, sourcing -- you know, I worked with a colleague, Rob
 4 Nixon, who is one of the CTT people, who drafted the
 5 first sourcing roadmap. When SCCL's suppliers -- who
 6 were, as we discussed earlier, mainly distributors based
 7 in the UK -- ran out of stock, we needed to rapidly work
 8 out who the underlying manufacturers were such that we
 9 could then approach them and Rob did a piece of very
 10 quick work on that and I discussed that with him, and
 11 that then became a cornerstone of the work that Emily
 12 Lawson took over, and fed into the China Buy.

13 So I was involved in that, but that was right at the
 14 start.

15 **Q.** All right.

16 **A.** I would say -- Rob did the work, almost, I would say, my
 17 involvement was *de minimis* on that.

18 **Q.** But you tell us -- excuse me.

19 **A.** I think between sourcing and distribution is the
 20 important point to about volume. So DH were the
 21 contracting party, they were the people with the
 22 forecasting ability. It was their forecasts that then
 23 the Buy Cell was just then told to execute. And it's
 24 not really the place for procurement people to decide
 25 how many tanks the army wants, or they say how many they

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1 I commissioned was actually a pricing analysis. So the
 2 big concern, if there's bias, favouritism, cronyism,
 3 which was what was being alleged, was that there might
 4 be a pricing advantage to the people that had been thus
 5 favoured. At the time we were using an external
 6 consultancy called Efficio to analyse the contract data
 7 and plot pricing -- that's an exhibit you've got -- to
 8 look at the pricing by category.

9 **Q.** Mr Rhys Williams, can I rein you in a little bit. We
 10 are going to come on to the GIAA reports and if at that
 11 point you wish to make points about the pricing analysis
 12 you'll be free to do so. I don't want to really go
 13 share right now, is that all right? Thank you.

14 The Cabinet Office and Number 10 also had some
 15 overview of the DHSC's procurement activities as PPE
 16 updates were given to the Prime Minister on a regular
 17 basis. That's right, isn't it?

18 **A.** Yes, but I didn't see those. That was -- Emily Lawson
 19 and her team would present that directly to the --

20 **Q.** You never attended those meetings?

21 **A.** Never might be too strong but -- I think never actually,
 22 but, no, I don't think at all.

23 **Q.** There were cross-departmental discussions about the
 24 sourcing and distribution of PPE, which presumably you
 25 did attend?

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1 want and then the procurement team's job is to find them
 2 in the most effective way they can do. So, again,
 3 I don't think any of us were involved in that demand
 4 framing.

5 **Q.** All right, let's touch now, if on the scale of the
 6 challenge that you and others faced, in terms of
 7 procurement, when the pandemic arrived. You tell us at
 8 paragraph 8.1 that:

9 "The scale of the challenge that the pandemic posed
 10 was unique in peacetime, the scope and intensity of
 11 procurement activity that was undertaken across
 12 government to meet this challenge was therefore
 13 substantial and underpinned our ability as a country to
 14 combat the virus to allow the NHS to continue to
 15 function and ultimately to protect the public."

16 Yes?

17 **A.** I don't know, is that from my --

18 **Q.** Those are your words, yes, paragraph 8.1.

19 **A.** Okay.

20 **Q.** Now in terms of visualisation to help us understand
 21 this, the scale of procurement activity, I wonder if we
 22 could have up on the screen INQ000497031. It's your
 23 paragraph 1.22, page 8 of your corporate statement. It
 24 shows us --

25 **A.** Ah, yes.

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1 Q. You know this, do you?
 2 A. Yes, I prepared this for the Inquiry when we first met
 3 some of your colleagues.
 4 Q. Yes, and it shows us, does it not, that the greatest
 5 intensity of activity on PPE procurement ended, PPE
 6 procurement being the orange --
 7 A. Yes.
 8 Q. -- end of June, beginning of July?
 9 A. Yes.
 10 Q. With other testing carrying on beyond that, and we can
 11 see, at much lower levels, ventilators --
 12 A. Oh, ventilators was really a one-off in March and April.
 13 Q. -- in March and April, for which you also -- you had
 14 responsibility?
 15 A. Yeah.
 16 Q. In relation to which we'll be hearing evidence from you
 17 tomorrow, rather than today?
 18 A. *(The witness nodded)*
 19 Q. All right. That's helpful.
 20 A. I think it's worth just explaining, these, I believe,
 21 are contract dates. So the delivery dates, when it goes
 22 to some of the points that you were sort of touching on
 23 earlier, the delivery dates --
 24 Q. With Professor Sanchez-Graells?
 25 A. Well, and with the gentleman from Transparency

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1 MR WALD: Thank you, my Lady.
 2 Mr Rhys Williams we had reached the topic of
 3 procurement guidance which is one that I hope to be able
 4 to deal with relatively briefly with you.
 5 You had agreed that, during the pandemic, it became
 6 necessary to issue on a number of occasions guidance by
 7 PPNs, procurement policy notices --
 8 A. Yes.
 9 Q. -- or notes. That guidance evolved as the pandemic
 10 progressed, didn't it?
 11 A. Yes, in a number of different ways.
 12 Q. But routed within the guidance is the importance of
 13 observing the principles of public procurement
 14 regulation, explained to us this morning by Professor
 15 Sanchez-Graells; that's right, isn't it?
 16 A. Yes.
 17 Q. He remunerated there are nine of them: predictability,
 18 effectiveness, economy, transparency, integrity, access,
 19 fairness, accountability and capacity. All of those are
 20 enshrined and are encouraged whether or not procurement
 21 is conducted on an emergency basis or on
 22 a business-as-usual basis?
 23 A. Yes, I think the keywords that will be in the EU regs
 24 from which, at the time, our regulations were derived is
 25 fair, open and transparent.

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1 International. The delivery dates, of course, are
 2 a couple of months after that. This is contract
 3 placement dates, I believe.
 4 Q. Yes. Yes, there's some time lag between contracts and
 5 arrival or deliveries, yes.
 6 All right, let's turn to another topic now, please.
 7 This is helpful to understand the scale of procurement
 8 and the challenge. A topic that was touched on this
 9 morning with Professor Sanchez-Graells: guidance. It
 10 became necessary, he told us, and I'm sure you will also
 11 tell us, during the pandemic, to issue guidance in the
 12 form of PPNs or Procurement Policy Notes.
 13 A. Yes, that was the standard way that pre-dated the
 14 pandemic for getting policy information out, not just
 15 the central government, right across the public sector.
 16 MR WALD: Yes.
 17 I'm conscious, my Lady, I'm starting a new topic.
 18 I don't know whether that is a convenient moment to
 19 pause.
 20 LADY HALLETT: Certainly.
 21 Yes, very well. I shall return at 3.30.
 22 (3.14 pm)
 23 (A short break)
 24 (3.30 pm)
 25 LADY HALLETT: Mr Wald.

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1 Q. Yes, those are the ones that Professor Sanchez-Graells
 2 alighted on as -- these aren't his words, but
 3 non-negotiables. The others, he said, may need to be
 4 adapted in the light of emergency circumstances but
 5 those of transparency and fairness, you would agree,
 6 need to be maintained whether or not one is procuring on
 7 an emergency basis?
 8 A. Yes, that's certainly the ideal.
 9 Q. In fact, one could go further, I wonder if you do. One
 10 could say that, in an emergency, where direct awards are
 11 made, it is all the more important to maintain and
 12 ensure that those principles of transparency and
 13 fairness are happening.
 14 A. So let me take those two in two bits. So transparency,
 15 I think, is really important and, during my time in the
 16 Cabinet Office, we have been publishing more and more
 17 things outside of the regulations, for example, KPIs,
 18 because they are performance indicators for a contract,
 19 because it is vital that the citizen feels that their
 20 money is being well spent and it also helps drive
 21 competition, so transparency is good. I --
 22 Q. Mr Rhys Williams, I don't want to in any way limit your
 23 answer but can I just have an answer directly to what
 24 I asked. I just want your view, please. Those
 25 principles apply whether or not one is in an emergency.

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1 I'm suggesting -- I'm inviting your view on whether they
2 should apply all the more in than emergency: fairness
3 and transparency?
4 **A.** So the reason I was separating them is I think they're
5 slightly different. So transparency: there are
6 additional requirements, rightly, as I've said in my
7 statement, and Professor Sanchez-Graells touched on it
8 as well. The workload to publish correctly, using
9 Reg 32 is rightly larger and more onerous, "Why have you
10 done this outside of the rules?"
11 **Q.** So is that a "Yes", in that case?
12 **A.** Yes, that is a "Yes".
13 **Q.** That's a "Yes". Okay. On the other one, is it a "Yes"
14 or a "No"?
15 **A.** So there are two legal cases going on that -- were
16 judged on the during the period of the pandemic that go
17 to, legally, whether, if you're operating under Reg 32,
18 whether you need to be -- to generate competition and to
19 be fair, I forget the exact wording.
20 As a point of principle however, yes, if you can
21 possibly generate competition, that is going to be
22 fairer and, in my statement, I point to a number of
23 examples -- there are many -- where, even where we use
24 Reg 32, we did generate a mini competition underneath
25 the Reg 32 in order to drive out value for money but

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1 **Q.** Some of the guidance that was issued during the pandemic
2 related to ministerial involvement in procurement,
3 didn't it?
4 **A.** Yes, so it was towards the end --
5 **Q.** Wait for the question, please. Your evidence contains
6 a number of references to the pressure that was brought
7 to bear on those responsible for procurement, due to
8 ministerial pressure, doesn't it? We'll come on to the
9 detail of that in a moment.
10 **A.** So --
11 **Q.** Is that a "Yes" or "No" and then whatever elaboration
12 you choose.
13 **A.** Yes, but with couple of caveats.
14 I think the pressure can take several forms and
15 I think a minister chasing "Have you done this yet?", is
16 one thing. Their office more usually chasing up, "You
17 said you would have done this by now, have you?", that
18 is also annoying but fair. That is very different from
19 a minister saying, "Buy this from them", which is not
20 right and, in my experience, that only happened to me in
21 one situation which I suspect we'll discuss tomorrow.
22 **Q.** We'll be hearing in due course from Mr Cairnduff and
23 Mr Hall, they had more of the day-to-day experience?
24 **A.** I wasn't involved in the High Priority Lane day to day
25 at all.

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1 also to allow other people to compete. But it was just
2 done very quickly and I think we heard this morning
3 about the 35 days minimum time, which just wasn't
4 acceptable in a lot of cases.

5 So I think my answers to transparency is yes,
6 absolutely. Fairness, if you can.

7 **Q.** If you can --

8 **A.** Within a Reg 32 context --

9 **Q.** -- then there's an enhanced requirement to achieve it in
10 emergency conditions.

11 **A.** Transparency?

12 **Q.** Transparency, yes. Fairness, if possible?

13 **A.** So there are conflicting legal judgments on this from
14 a public first case, which said "If you're doing Reg 32,
15 then you don't need to consider other angles", and then
16 the case against PestFix, bizarrely because the
17 government won it, we weren't able to challenge the
18 ground of whether -- I don't think the word used was for
19 equality of treatment was something we needed to test,
20 but I deferred to the legal profession on that.

21 **Q.** All right.

22 **A.** But from the point of view of getting the best value for
23 money, the best deal for taxpayers, then, yes, the more
24 fairness you can introduce, the more competition you can
25 introduce, obviously the better.

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1 **Q.** You weren't involved in the High Priority Lane day to
2 day. So far as ministerial pressure is concerned, and
3 its impact within the High Priority Lane, those
4 witnesses will be able to give more direct evidence to
5 this Inquiry?

6 **A.** Absolutely. Yes.

7 **Q.** So let me come to the question then. The guidance that
8 was issued in relation to ministerial involvement on
9 procurement, did that come about in order to respond to
10 the problem of ministerial involvement in procurement?
11 Let's not get into which types of pressure we are
12 talking about. You've given a range of different
13 possibilities, but ministerial pressure or ministerial
14 involvement in procurement itself provoked some
15 guidance, didn't it?

16 **A.** Yes, and the answer is partly. Partly to address the --
17 if you read that it's a document that I think was
18 published in July '22. I think I drafted it in April
19 and later in '21. Partly --

20 **Q.** You drafted it?

21 **A.** Yes, with Chris Hall. So partly -- who you'll talk to
22 later in the week, my Lady. So there are conflicts of
23 interest tightening of wording in there. It's not for
24 me to write or contribute to a ministerial code. That
25 is not what a civil servant is allowed to do but

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1 I thought that that guidance would nonetheless be
2 helpful to be clear on conflicts of interest, and what
3 that establishes, the idea that, as soon as the minister
4 see and the gentleman before me touched on this -- as
5 soon as the minister meets or has contact with
6 a supplier who is interested in a procurement, they
7 should declare a conflict of interest or not, but there
8 should be a document done there and then. So that bit
9 of it was triggered by the pandemic.

10 Lord Maude, a few years before, I forget exactly
11 then, had issued some very good guidance on how
12 ministers could be involved but his guidance was limited
13 to the procurement process itself. What it missed was
14 the pre-procurement, which is exactly the subject that
15 the Inquiry is rightly interested in, and also, it
16 didn't cover contract management, which you may be
17 interested in. So I was trying to tighten it up and
18 cover that first and third block, if you like, out of
19 the three, around the centre that Lord Maude had already
20 done a few years before.

21 **Q.** Mr Rhys Williams, I am going to have to do my best to
22 tighten up the question and answer because we have
23 a limited amount of time. You have lots of very
24 interesting things to say but we're going to have to
25 stick to the topics that I'm asking you about, if that's

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1 other, where the government had persistently run into
2 problems or industry had run into problems.

3 **Q.** Would it have been helpful or desirable for there to
4 have been a playbook, particularly for those -- likely
5 almost everyone -- unfamiliar with the workings of
6 Regulation 32, emergency procurement?

7 **A.** Yes, but it might have become shelfware. I think the
8 PPN was put out, 120, which was the one that covered the
9 use of Reg 32 was very thorough and went to everybody
10 and they would have read it because it was there on the
11 desk at the right time.

12 **Q.** All right, I'm moving on to transparency. We've touched
13 on it already and the importance that you ascribe to it,
14 not just even in an emergency, but especially in
15 an emergency?

16 **A.** Particularly.

17 **Q.** You are, of course, aware of both High Court challenges,
18 you've referred to one of them, the PestFix one where
19 there was a finding in relation to that there was --
20 a finding that the High Priority Lane was contrary to
21 equal treatment principles, but there was also a High
22 Court challenge that considered the late publication of
23 contract award notices, of which I'm sure you're aware?

24 **A.** Yeah.

25 **Q.** Yeah. You agree had the late publication of contract

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1 all right. I just want to know, were you responsible
2 for drafting the contract award notices that came out
3 around the same time?

4 **A.** No.

5 **Q.** You weren't?

6 **A.** No.

7 **Q.** All right. Emergency procurement is something that
8 seldom happens, isn't it?

9 **A.** Yes.

10 **Q.** Would you accept that even experienced procurement staff
11 did not have much experience in emergency procurement?

12 **A.** Yes, by nature, it doesn't happen very often.

13 **Q.** Yes, and there wasn't pre-existing guidance available to
14 assist those individuals?

15 **A.** Correct. That's why we put out the PPN120.

16 **Q.** Nor playbooks?

17 **A.** Playbooks is something slightly different. Playbooks
18 are more how do we work with a particularly different
19 segment of our industrial base.

20 **Q.** They are more focused in their remit?

21 **A.** They are not so much about procurement regulation as
22 best practice, both from our side, the Government's
23 side, the public sector side, and from the supplier
24 side. They were co-developed with industry on
25 a sector-by-sector basis in four sectors, one after the

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1 award notices undermines transparency, doesn't it?

2 **A.** Yes, and I think in my statement I say it's one of my
3 big deepest regrets because it allowed, you know,
4 concerns to multiply and it is, you know, a matter of
5 huge regret that we just weren't able to get those
6 publications done, and you will have seen in my
7 statement lots of emails to DH, DHSC, encouraging them
8 in stark terms to try to find the resource to publish
9 faster.

10 **Q.** In brief, it erodes public trust in the process?

11 **A.** Yes.

12 **Q.** Yes. That was in relation to PPE but there were also
13 late publications of contract award notices for
14 ventilators, weren't there?

15 **A.** Yes, yeah, that -- we've covered that in my statement.

16 That was a regrettable oversight. As soon as that was
17 highlighted, we published the contracts. We'd already
18 published all the cans(?), so the award notices, but we
19 hadn't published the redacted contracts partly because
20 the CTT, the Complex Transaction staff, who were working
21 on that, to be honest, don't normally do actual
22 procurement hand -- you know, turning the engine
23 themselves. They're there to advise governments and it
24 was just a slip-up and, as soon as we were alerted to
25 that, they were published.

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- 1 **Q.** I was going to ask you for the reasons for it. You said
2 regrettable oversight. I think in fairness to you we
3 should look at table -- the table at page 45 of your
4 evidence, it's Inquiry document INQ000497031. It sets
5 out, as I'm sure you're aware, you included it in your
6 evidence, the rather, if I may say so, onerous or even
7 counterintuitive or clunky nature of the contract award
8 not requirements. Would you agree with that description
9 of what was required and when?
- 10 **A.** Yes, it's overly complicated and allowed people to say,
11 "Oh, well, I thought I had to do this but in fact" -- so
12 there's a distinction made, my Lady, between central
13 government departments and arm's-length bodies, while,
14 was SCCL an arm's-length body because it belonged to DH
15 or -- yeah, anyway. And it's complicated. Different
16 dates for different scenarios and, over a period of
17 time, colleagues published different PPNs clearing this
18 up and it's now -- and the Procurement Act is crystal
19 clear.
- 20 Now, the confusions in here to be honest, none of
21 those readings of confusions would explain -- we were
22 late under any reading of this. I'm not trying to hide
23 that. We were very late to publish, regardless of which
24 column or box you pick on, on here.
- 25 **Q.** The regrettable oversight was in part down to

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- 1 **Q.** You say that the Act brings much needed clarity, as
2 well?
- 3 **A.** So under the old regime -- yes. Under the old regime,
4 the -- you had to do contract award notices right at the
5 start when you're thinking about an award, and at the
6 end when you placed a contract. And then, actually,
7 when the contract timed out at the end.
- 8 Now, there are multiple, from memory a dozen,
9 different contract notes you have to lodge at different
10 stages in your procurement. Not only does the Act now
11 require machine readable data, which is obviously much
12 more transparent, anyone can look at that, but it's in
13 standard format, only one -- unique identifiers, the
14 gentleman talked about earlier different spellings for
15 the MoD. We've got rid of all of that. We now have
16 a machine which is basically a dropdown data safe, there
17 is only one University of Sheffield, there is only one
18 MoD, there is only one version of a customer, because
19 we're trying to clean up procurement data.
- 20 But it also, having a series of notices, as they're
21 called, allows anyone -- my successor -- to look through
22 and say, "Hang on, there's seven notices here, whether
23 where's the eighth?", and chase up so it goes to --
24 a couple of the comments from this morning about how do
25 you ensure that the new transparency agreement is --

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- 1 old-fashioned IT and data management tools, wasn't it?
- 2 **A.** No, the lack of publishing of the ventilator contracts
3 I think was just an oversight. The complexity you talk
4 about in DH was absolutely a part of that, reading
5 everyone's evidence, and at my understanding at the
6 time, because the PPE Buy Cell weren't allowed, for
7 obvious reasons to join the MoD procurement system
8 computer because that would have generated all sorts of
9 security concerns, and neither were they allowed to join
10 the DH system, and the SCCL system at that time -- it's
11 been updated since -- was -- just didn't have enough
12 space for enough users.
- 13 So they were completely separate, and that generated
14 finding the data problems that are talked about by my
15 colleagues and in my statement.
- 16 **Q.** All right. You've emphasised more than once in your
17 evidence to us today the importance of transparency.
18 Why was it that the Cabinet Office withdrew the
19 transparency guidance in June 2021?
- 20 **A.** It withdrew the one from 2019 and clarified it along the
21 lines of the table that you just showed up --
- 22 **Q.** I beg your pardon, you're quite right. It was November
23 2017 is what it withdrew.
- 24 **A.** Sorry, it withdrew the one from '17 and replaced it with
25 a clearer version in 2021.

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- 1 arrangements are being put in place and that's what
2 Parliament has allowed us to do. It is much better.
- 3 **Q.** From this morning, again as a reference to the evidence
4 of Professor Sanchez-Graells, yes?
- 5 **A.** But I think also -- forgive me --
- 6 **Q.** Mr Bruce?
- 7 **A.** Mr Bruce touched on the same matter.
- 8 **Q.** So did you hear Professor Sanchez-Graells reflections on
9 the problem of enforcement within the new Act?
- 10 **A.** Yes, that's -- my -- my comments just now sort of go to
11 that. We weren't given by Parliament enforcement
12 powers, but nonetheless, that's a stepped series of
13 notices, it will be easy to detect if there's one
14 missing or if one has not been submitted that should
15 have been, which is the mechanism I had to adopt halfway
16 through the pandemic to work out who had not submitted
17 the appropriate transparency requirements.
- 18 So this will be much tighter in the new -- under the
19 new regime.
- 20 **Q.** Well, detection is one thing, enforcement is another.
21 You'd agree with the professor that there is a problem
22 in that the enforcement mechanisms are inadequate within
23 the Act?
- 24 **A.** Well, I would say an alternative approach to that would
25 be the NAO asking my successor every now and then to

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1 give them a list of which notice series hadn't been
2 completed and I think that would achieve much of what --
3 I don't speak for the professor -- but that would drive
4 adherence pretty quickly.

5 **Q.** All right. I don't think we're going to discuss now the
6 relative merits of the two routes but let's move on to
7 the call to arms, which is a matter that you deal with
8 relatively extensively in your written evidence.

9 You were involved in the procurement of ventilators,
10 as you've told us. There was a public call to arms for
11 the supply of ventilators, wasn't there?

12 **A.** Sort of, but not in the same way as for PPE.

13 **Q.** Not in the same way. But whatever it was, it resulted
14 in a number of offers of support from businesses in
15 relation to PPE, as well, didn't it?

16 **A.** Yes, because by that time I think the public had woken
17 up to the idea that we were in a problem situation, to
18 put it mildly.

19 **Q.** You wanted to avoid a call to arms in relation to PPE of
20 overwhelming the system, didn't you?

21 **A.** I was nervous about that. We got some 5,000 responses
22 to the relatively limited call for ventilators, and
23 I was concerned -- and that nearly broke the back of the
24 team processing them and I was concerned with PPE, which
25 is a much more commodity item, that, as indeed turned

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1 15,000 suppliers in a period of only around 15 weeks."

2 So the system was under enormous strain as it was?

3 **A.** Yes, the point I was trying to make earlier is I think
4 the initial series of offers for PPE that came in after
5 the ventilator call to arms, much more limited,
6 accelerated when there were -- when there was a PPE call
7 to arms. So that's the point I was trying to make.

8 **Q.** Now you've expressed your views on the risks of a --
9 thank you very much for that display -- on the risks of
10 a PPE call to arms, but you were invited to express your
11 view at the time, weren't you --

12 **A.** Yes.

13 **Q.** -- on that? And you did so, didn't you? You said that
14 your office replied on 23 March to state that you would
15 support a call to arms for PPE but any if there was
16 a dedicated mailbox for it, and a PMO team to triage the
17 offers coming through effectively. And you made
18 a series of recommendations in relation to it, didn't
19 you? Do you recall?

20 **A.** Yes, not the individual ones but yes, absolutely.

21 I think it's fair to say at that time a decision had
22 been taken by ministers to have a call to arms, and I'm
23 saying, "Well, okay, if that's what you want to do, but
24 please can we have this ready to go before you do it."

25 **Q.** We'll bring it up on the screen if necessary but it may

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1 out to be the case, we would be drowned in offers that
2 we would then need to go through but which, regrettably,
3 would probably turn out not to be worth pursuing.

4 **Q.** There was eventually a call to arms in relation to PPE
5 but, even before that, the Cabinet Office and DHSC were
6 receiving high volumes of offers, weren't they?

7 **A.** Yes.

8 **Q.** Before the call to arms.

9 **A.** It accelerated.

10 **Q.** It made it worse?

11 **A.** It accelerated, yes.

12 **Q.** As a result of the call to arms?

13 **A.** I believe so but I could get you that data, but I --

14 **Q.** Let's have a look at -- can we display INQ000497031,
15 please.

16 And this is in your evidence:

17 "Many new suppliers responding to the pandemic
18 emergency worked extremely hard to create successful
19 products in a short timeframe, and this led to the
20 success of the Ventilator Challenge. The very large
21 number of offers for PPE, however, led to extreme stress
22 on the procurement system ..."

23 And then here are the numbers, which I didn't expect
24 you to recall, hence putting up the screen now:

25 "... approximately 25,000 offers were received from

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1 not be so. Your recommendations, perhaps on the basis
2 that it was a *fait accompli* by then, included reducing
3 the amount of human interaction by using a web form;
4 yes?

5 **A.** Yes.

6 **Q.** Avoiding a situation where emails were going all over
7 the place, and requesting details of product
8 specification volumes and delivery dates.

9 And then you said this:

10 "... if it's anything like the response to
11 ventilators you will be inundated with offers, possibly
12 even more given some of the items are less technical
13 than others ..."

14 And this is your commodity point, isn't it?

15 **A.** Correct.

16 **Q.** So, picking up on the first point first, why was the
17 advice that you gave to reduce the amount of human
18 interaction?

19 **A.** So with ventilators, what we were initially trying to
20 get was a ventilator, a unit. Most of the 5,000 things
21 that came back -- offers that came back in, my Lady,
22 were for bits, for components, which -- useful but not
23 that useful. That's not an option with PPE. It's
24 either -- it is what it is. I think the mask is a mask.

25 And so it was obvious we would need to be much more

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1 specific about the items that someone was offering, and
2 that's why the web form ended up with the questions set
3 that it did.

4 **Q.** Wasn't it the case that you were anxious that those
5 individuals responsible for triaging offers should be
6 protected from the deluge by a web form, by the
7 requirement that a number of specifications were offered
8 by whoever it was that was making the offer at the
9 outset, effectively removing the human burden on that
10 paragraph of triage?

11 **A.** Well, reducing it. I don't think you were ever likely
12 to remove it because, as you heard this morning, there
13 are -- the word "gown", there are lots and lots of
14 different flavours of gown, but it least it would, you
15 know, do the first cut of what is being offered.

16 **Q.** To your knowledge, was any of the advice in your joint
17 Chief of Staff note followed in that call to arms?

18 **A.** Well, we did end up with a web form. It went through
19 a number of iterations.

20 **Q.** But the call to arms proceeded in any event? You have
21 indicated a moment ago that it was a *fait accompli* by
22 the time you were giving advice, but a few days later
23 the call to arms was made, wasn't it?

24 **A.** It was going to happen, then it was postponed, then it
25 was postponed, then it happened. But there was -- you

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1 offers being referred had the capacity to overwhelm my
2 office."

3 **A.** That's a slightly different point. So initially, the --
4 I think my office email was used before we had a web
5 form. Then we build a web form, then we build a better
6 web form. And that then meant that the offers didn't go
7 direct to the, by then, probably half a dozen people in
8 my office who were triaging. But that was right in the
9 early -- that was in the early couple of days of the
10 PPE offer period.

11 **Q.** Can we display now, please -- to get a sense of how it
12 was experienced by those responsible for the day-to-day,
13 so Chris Hall was an example, Max Cairnduff another
14 example, could we have INQ000534626, please.

15 Do you see this email entitled "I dream about this
16 stuff"?

17 **A.** All of us had -- I think that might have been alluding
18 to the fact that none of us were getting any sleep. So
19 yes, I remember that.

20 **Q.** If we scroll down a little bit we can see Chris Hall
21 writing:

22 "We have designed the least efficient process
23 possible."

24 Note the date, 13 April.

25 Secondly:

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1 know, if you remember the daily briefings, there was
2 plenty of talk about the country is short of PPE. So
3 everybody knew that this was --

4 **Q.** Matt Hancock made the announcement that contained the
5 call to arms, didn't he?

6 **A.** Yes.

7 **Q.** Yes. And what was the effect of it? Were your fears
8 well founded? What was the effect of those that were
9 already experiencing a significant amount of pressure?

10 **A.** Well, as the data that you put up shows, the call to
11 arms worked in the sense that we got lots and lots of
12 offers and we had to race to find more and more people
13 to staff the PPE Cell in order to deal with those
14 offers. And substantial backlogs built up, because we
15 were not able to find enough people fast enough to be
16 winning against the rate of inflow of new offers.

17 **Q.** It consumed your team, didn't it?

18 **A.** Well, I think we ended at 500-and-change people in the
19 team. So this is people from all over government that
20 we were drafting in to do this work.

21 So if you meant by "[my] team" the Complex
22 Transactions Team, yes, I mean -- but there was 35 of
23 them. This was multiples of that.

24 **Q.** What you tell us in your evidence is that:

25 "Over the following days it became clear that the
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1 "The lag in the process and shipping is killing our
2 demand signal."

3 What do you understand by that?

4 **A.** Okay --

5 **Q.** He sets it out a little bit underneath there.

6 **A.** So a couple of things about this email. What's missing
7 from this photocopy of it -- so Chris blind copied me
8 into that, so this was a discussion between him and Max.

9 So, as you heard today, the process that was put in
10 place for the PPE was very linear: one team, then
11 another team, and then another team.

12 Now, that is very good for stopping corruption
13 because you would have to engage, you know, an
14 individual person in all of those linear steps in order
15 to get a corrupt response. We can -- I'm sure we'll
16 come back to that. But there are lots and lots of
17 hand-offs in that. So that's what I understand Chris is
18 meaning by "least efficient process".

19 And it was shortly after this email that Chris and
20 the team, Andy Wood and others, started thinking about
21 the rapid reaction teams that you've touched on earlier,
22 which are much more flexible but if you're going to have
23 a rapid reaction team, which they decided to organise by
24 category, ie one team for gowns, one team for gloves,
25 one team for mask, whatever, you need people in those

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1 teams who actually understand the product much more than
2 you do if you've got a pool of people that you can
3 access in the linear structure that we started with.

4 So that's what I understand.

5 And the lag, we were being very slow. Weeks in some
6 cases. I'm not across the detail but I'm sure Chris or
7 Max or Andy will be able to give you the detail. We
8 were taking weeks in some cases to process even the good
9 offers.

10 **Q.** And that's crucial, isn't it, because in a volatile
11 market, in a competitive market, speed of processing of
12 offers is absolutely crucial; that's right, isn't it?

13 **A.** Absolutely.

14 **Q.** Yes. Which means that any offer that is processed more
15 quickly, by dint of that alone, will have a better
16 prospect of succeeding in securing a contract. That's
17 the finding of the High Court.

18 **A.** Yes, could I -- perhaps I could put a little nuance on
19 that?

20 I think the High Court was talking about the early
21 stage of introducing it to the technical team. This is
22 an unusual situation. Most procurements, my Lady, you
23 put out a bid, you say what you want, and there are
24 dates and then an order.

25 With this we were getting constant offers and DHSC
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1 **A.** I'm saying it's much more random. It's not a question
2 of who start -- everyone starting at the same time, who
3 gets to the finishing line first gets the order. That's
4 not how it was. I wasn't running the team, I wasn't in
5 the team, but that was my understanding at the time and
6 remains my understanding.

7 **Q.** Well --

8 **A.** There were multiple offers coming in on different days
9 and multiple orders being placed on different days, and
10 so you needed your offer for whatever it was to match
11 the demand for whatever it was on the day that that
12 happened, and they might be weeks apart.

13 I think there's a lot of -- I think Chris has done
14 some analysis recently, which I think the Inquiry has
15 got. There's a huge variation in the amount of time
16 that offers took to get through the machine. So it's
17 not as deterministic as I think -- I sympathise with
18 what you're saying, and in a normal race event that
19 would be true but I think it's a little bit more
20 nuanced.

21 **Q.** You're not aware of any of those that chased for
22 feedback on offers, asking that their offer should be
23 slowed down, are you?

24 **A.** So no, but neither am I aware of -- which is not to say
25 there weren't any -- the Inquiry has a lot more
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1 was wanting to make constant offers. So there is an
2 issue with -- irrespective of speed, and we've done some
3 analysis recently which you'll probably want to talk to
4 Chris Hall about, you need the offer to land at the same
5 time as the requirement.

6 So suppose that a gowns offer had gone fast through
7 the system, if it turned up the day before there was
8 a gowns requirement, it wouldn't necessarily have got --
9 resulted in an order. On the other hand, one that
10 turned up slower but after the requirement had been
11 flagged might get "Aha!"

12 **Q.** Well, let's deal with that point --

13 **A.** So it's not like a normal system where there's a -- like
14 a racetrack, it's the first across the finishing line;
15 there were being offered -- there were being contracts
16 placed repetitively every -- well, multiple contracts
17 every day I think for most categories.

18 **Q.** There was internal guidance that recommended or that
19 required the rejection of offers that were two weeks old
20 or more, weren't there wasn't there?

21 **A.** I think that was something within the technical approval
22 stage, yes.

23 **Q.** Yes. So you're not suggesting that an offeror might
24 benefit from delay in the processing of his or her
25 offer, are you?
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1 information than I had at the time and have now. But
2 that's why I tried to draw the distinction earlier
3 between -- asking for "Have you assessed this offer?" is
4 annoying but legitimate, to -- whereas "Place an order
5 with that person" or "Speed that up" is not legitimate
6 unless it's a very attractive offer.

7 So there were days -- I'm sorry for the lengthy
8 answer, but there were days when, as I understand it,
9 Emily Lawson got a demand signal from nurses in the NHS
10 that, "Gowns are very urgent today, we're about to run
11 out", or "Gloves are very urgent today", in which case
12 that would be a good reason for accelerating pulling
13 things through the system.

14 **Q.** We'll come on to modelling in due course, but the
15 reality is for a long period, so far as PPE was
16 concerned, the practice was to acquire as much as
17 possible as quickly as possible, wasn't it?

18 **A.** Yes, in which case the time that the order -- the offer
19 got there is not so relevant either.

20 **Q.** Well, that's -- that's not quite right, is it,
21 Mr Rhys Williams, because those that made their way to
22 the decision sooner than others, given that there is
23 guidance that says "Two weeks or more, the offer is
24 expired", you've got to get to the decision-making
25 process within two weeks in order to be in contention
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1 for a contract?

2 **A.** I deferred to others on this but I think that two weeks
3 related just to the technical assessment phase.

4 **Q.** All right, well, we'll wait, we'll hear on Thursday from
5 Mr Hall and from Mr Cairnduff. We can pick up these
6 points with them.

7 But looking back, the call to arms was a mistake,
8 wasn't it? It was counterproductive?

9 **A.** I can understand why it needed -- why politicians felt
10 it needed to happen but it had some very, very serious
11 ripple -- well, more than ripple, it caused huge
12 problems, and a lot of the problems that the Inquiry is
13 rightly looking into, I think, flow as much from that as
14 they did from our lack of stock to start with.

15 **Q.** Well, that's a very, if I may say so, diplomatic if
16 telling response. You can understand why politicians
17 felt it had to happen. It was an announcement that was
18 counterproductive in terms of the challenges of
19 procurement at the time. That's fair, isn't it?

20 **A.** Yes, the yield from the offers generated through the
21 call to arms rather than getting the industry into
22 a room, which is what we did with ventilators, I suspect
23 was marginal.

24 **Q.** It's an example of ministerial pressure or ministerial
25 interference proving unhelpful, isn't it?

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1 under enormous pressure to make progress and secure PPE,
2 yes?

3 **A.** Yes.

4 **Q.** Now, I am going to suggest to you that that pressure can
5 be thought up in the following four categories:
6 frontline staff pressures, ie the obvious pressure that
7 arises from the vital need to supply those on the
8 frontline with urgently needed PPE. Yes?

9 **A.** *(No audible answer)*

10 **Q.** Ministerial pressure, and we've touched on that.
11 Political pressure which is slightly distinct, and then
12 pressure from the media?

13 Now, clearly, first and foremost is the frontline
14 staff pressure. I'm not going to develop that with you.
15 I see you nodding, you'd accept that that is first and
16 foremost.

17 **A.** Everybody was watching the videos from Newsnight and
18 knew exactly what the problems were and how ghastly it
19 was.

20 **Q.** You have referred several times in your statement to
21 ministerial pressure, examples are at paragraphs 38,
22 103, and so on. You yourself paint a picture of
23 ministers and the media generating real pressure for
24 those procuring PPE to demonstrate progress. That was
25 the day-to-day experience, wasn't it?

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1 **A.** Um, yes, I wouldn't describe it as "pressure". It was
2 a decision that ministers took to engage the country.

3 **Q.** Against your advice?

4 **A.** Yes.

5 **Q.** It's even an example of ministerial deference as
6 explained to us this morning by Professor
7 Sanchez-Graells, isn't it?

8 **A.** I would say it was slightly different. I mean, there
9 was no way on earth I could have stopped the Secretary
10 of State for Health, you know, getting on TV to say what
11 he said. Ministers are, you know, enabled to take those
12 sorts of decisions.

13 **Q.** No, the only practical way of doing so would be to be
14 even more forthright in your advice or your caution?
15 That would be all you could have done?

16 **A.** Yes. The notes are pretty forthright, and I suspect he
17 was getting similar -- I don't know this -- similar
18 advice from within DHSC. So he wasn't my minister. So
19 again, that's -- the government doesn't work like that.

20 **Q.** I want --

21 **A.** It doesn't quite work like that.

22 **Q.** -- to pick up with you the theme of different forms of
23 pressure, we've looked at ministerial pressure it's one
24 of the forms I wanted to ask you about. Procurement
25 teams, particularly at the start of the pandemic, were

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1 **A.** Yes, but I -- but I don't believe that was on specific
2 orders, it was "Where is the PPE?"

3 **Q.** Did it result in being a distraction from the important
4 task of actually assessing offers and negotiating
5 sensible contract terms?

6 **A.** I don't think the media was a distraction, the civil
7 servants aren't allowed to talk to the media, so it was
8 a constant reminder of the state of the country, and the
9 state in hospitals, you know, and people were dying. So
10 that generates a lot of pressure. But ministerial
11 pressure, translated into chasing -- and I wasn't in the
12 team, so I defer to my colleagues -- but my
13 understanding at the time and now was that that was
14 "Have you processed this offer?", rather than order it
15 from this person. And that -- so I think that -- you
16 need to distinguish between noise and pressure, perhaps.

17 **Q.** Well, you made that point earlier but let's take that
18 example. You had an offer that comes in, say, through
19 the High Priority Lane. It's followed-up by a request
20 for feedback. There are also many offers that confirm
21 in that our outside the High Priority Lane, yes?

22 **A.** Yes.

23 **Q.** They, of course, are not followed up with any request
24 for feedback. There is no referrer for those offers
25 unlike in the HPL?

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1 A. I'm not sure that's true because the large offers that
2 came through on the non-HPL would rapidly have become
3 known to people and so would have generated, you know,
4 where have we got to on that one? That looked like
5 a good one. But it was perhaps from a different set of
6 people. I don't know. Again, I defer to my colleagues
7 on that.

8 Q. But even if, as you say, the request for feedback was
9 not to the point of, you know, strike a contract here
10 but, rather, "What is the state of play in relation to
11 this offer", that request for prioritisation could quite
12 easily have proved a distraction to the task of
13 assessing offers in the round against all the data that
14 was available. I mean, you must agree surely --

15 A. Yes.

16 Q. -- that it may have had that effect?

17 A. It was completely a distraction and that's why I think
18 the idea behind the HPL, I wasn't involve in setting it
19 up, but I think the idea was to have a single point
20 manned by rather more senior people than were in the --
21 than were generally found in the Opportunities teams to
22 be able to put all that in one place.

23 If the Inquiry accepts that the chasing was
24 inevitable, the alternative was to distribute the
25 referred offers across the eight Opportunities teams, in
201

1 have seen that minute until it showed up in the evidence
2 packs. I believe that the test that they're talking
3 about there is the "Have we got four months" -- sorry,
4 my Lady -- "Have we got four months of stock of
5 everything", which was a key test I believe that the
6 Prime Minister had set before releasing lockdown.

7 I think I should also clarify, CCS in that sense of
8 the word there does not mean Crown Commercial Service
9 but rather means Civil Contingency Secretariat.

10 Q. All right, understood. Okay, so that's your answer in
11 relation to that document.

12 A. Yes.

13 Q. Yes. So far as media pressure was concerned, you were
14 aware of significant media scrutiny. In fact, you
15 referred to it earlier in relation to the GIAA reports,
16 and what you described as negative media attention.
17 That's paragraph 38 of your statement, yes?

18 A. Yes, the media, there were a lot of stories in the media
19 about PPE buying.

20 Q. Would you say that concern about public perceptions
21 regarding the progress in buying PPE consumed a lot of
22 government time and energy during the pandemic?

23 A. Well, government -- well, yes, because the media does
24 consume a lot of government time.

25 Q. But by those who were responsible for procuring, were
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1 which case the questions would still have arisen but
2 they would have been harder to respond to and probably,
3 because there were more junior people in the other
4 Opportunities teams, I suspect, you know, that the
5 effect that you allude to of, "Does this generate
6 action", would have been more of a risk than the way
7 that we did end up with it. Again, I defer to my
8 colleagues on that.

9 Q. All right. I said that I was making a distinction
10 between ministerial and political pressure. Could we
11 now please display INQ00088672, and just have a look at
12 paragraph 3 of this. It's minutes of a cabinet meeting
13 4 May 2020. Paragraph 3:

14 "DHSC to produce, by close on Tuesday, 5 May, a plan
15 which sets out:

16 "A proposition for the definition of the PPE test.

17 "A clear and credible set of steps that will be
18 taken to meet the PPE test.

19 "And a forecast of when the PPE test will be met,
20 including an assessment of whether the test can be met
21 by the end of the week. This plan should be consistent
22 with the data picture set out in the CCS dashboard."

23 Was that sort of test and, once it had been set, the
24 requirement to meet that test, helpful, in your view?

25 A. So I wasn't at that meeting and I don't think I would
202

1 they placed --

2 A. I'm sorry, could we let me know which document you're
3 looking at?

4 Q. No, I just asked you a question. You refer at
5 paragraph 38 of your HPL statement -- I don't have
6 an Inquiry document number.

7 A. I've got it here.

8 Q. You've got it? Great.

9 A. 38 is talking about the rapid response teams?

10 Q. No, I'm talking about media scrutiny, or paragraph 88.

11 A. Aha, sorry.

12 Q. Inquiry document INQ000531549.

13 A. I've got 536362.

14 Q. If we start at 38 at then move on to 88.

15 A. So 88 talks about overwhelming number of offers, but
16 that's in my HPL statement. I'm so sorry.

17 Q. I'm sorry, INQ000536362.

18 A. Yes, which paragraph, sorry?

19 Q. Unless they've changed, it's 38 and 88.

20 A. The one I've got --

21 Q. Paragraph 38.

22 A. Ah, page 38. Sorry.

23 Q. It's now 39.

24 A. Sorry, your colleagues have put up page 39.

25 Q. No, paragraph 39, page 15, forgive me.
204

1 A. Ah.
 2 Q. "A hot political issue".
 3 A. Possibly that's political with a small "P". There was
 4 a discussion at the time -- sorry, I'm just reading this
 5 but my memory of that meeting was there was a discussion
 6 at the time as to whether PPE procurement should move
 7 from DHSC as being the lead department to the Department
 8 for International Trade, and the Cabinet Secretary was
 9 Mark Sedwill at the time, called the meeting to discuss
 10 that. Well, there were several meetings to custody
 11 that.

12 I mean, it was a "hot Political issue" with
 13 a capital "P", meaning ministers as well, but at this --
 14 what I intended to say here was, you know, there was
 15 some debate internally as to how -- who should lead on
 16 this.

17 Q. You say at 89, I don't know if you've got paragraph 89
 18 there:

19 "In such a situation it was perhaps inevitable that
 20 individuals who had PPE and were wanting to sell it to
 21 the UK would do what they could to bring that to the
 22 attention of those with power in the administration,
 23 ministers, MPs and senior civil servants, including
 24 using any links or contact details that their company
 25 might have."

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1 or at least we see an indication of the origins of the
 2 High Priority Lane. Email from Mr Wood.

3 Does it go over on to a second page? If we could
 4 scroll down, please. That's it.

5 "Another action I took was to advise Lord Agnew if
 6 we could fast track ministerial/seniors emails regarding
 7 offers of help that they were sending through. We have
 8 developed a public *pro forma* -- very simple, that
 9 automatically populates our database. We may change
 10 that by providing a field that alerts us to
 11 a 'ministerial/seniors link' but we need to do this
 12 carefully so as to avoid ministers inboxes being clogged
 13 up with scammers claiming association. In the meantime,
 14 and for Lord Agnew please send 'hot' leads to myself."

15 Do you -- is that consistent with what you
 16 understand to be the origin or the genesis of the High
 17 Priority Lane?

18 A. Yes, I can't see the date on this but I suspect that was
 19 at the very -- at the very start. The --

20 Q. If we scroll through --

21 A. The public *pro forma* I think they're talking about is
 22 the web form --

23 Q. 25 March.

24 A. Yeah, so right at -- right at the start. The problem
 25 that this generated, or of offers coming directly into

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1 That really is the genesis of the HPL, the High
 2 Priority Lane, isn't it?

3 A. No. So, yes, any supplier, whether for good reason or
 4 bad, will try to get to the highest decision maker, or
 5 as they perceive it, point that they can in order to
 6 say, "I've got this stuff, it's really good, you should
 7 buy it", and there were lots of very well-intentioned
 8 people who did just that, and also quite a lot of bogus
 9 offers in that way. The HPL arose from what happened
 10 next, which was once ministers or other offices or other
 11 officials' offices had referred those, often with a just
 12 'Over to you' type of referral note -- colleagues can
 13 talk about those, and you've, I think, got examples --
 14 the HPL was in response to then the chasing calls to,
 15 "What has happened to the thing we sent you three days
 16 ago? Have you" --

17 Q. That's right --

18 A. It wasn't the action of the suppliers, per se, that
 19 generated the HPL, it was the chasing subsequent.

20 Q. It was the referrers, that -- to put it bluntly, because
 21 the referrers were relatively demanding, the High
 22 Priority Lane was set up?

23 A. Yes.

24 Q. Yes.

25 And we see that from Inquiry document INQ000498337,
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1 someone's office, is that they were bypassing filling
 2 out the *pro forma*, and therefore there was different --
 3 we had to get hold of that information or somehow
 4 populate that ourselves in order to know exactly what
 5 they were talking about. So I think that's what he
 6 means by the *pro forma* there. But Andy will be able
 7 to -- I don't think I saw this at the time.

8 Q. Now, I think I'm right in saying that in your evidence,
 9 the only concern you express about the HPL is in
 10 relation to its name; is that right? Is that fair?

11 A. No. The problem we had anyway is, once you have, as
 12 I've said earlier, a China team, a Make team, several
 13 Opportunities team, is that we are already in dangerous
 14 territory from a point of view of fairness, because
 15 inevitably there are different routes, and that is not
 16 what you should strive for.

17 And that -- but that flows directly -- hence my
 18 comments about the number of offers and the call to
 19 arms. One flowed from another. We just couldn't put
 20 all of those offers through a single channel. So we
 21 were already in a "How do we handle this? We are in,
 22 you know, tricky territory from a fairness and
 23 consistency point of view."

24 Q. But that's a slightly different point to the one I was
 25 asking about. What were your other concerns about the

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1 High Priority Lane? It's name was one of them, wasn't
2 it?

3 **A.** Well, yes, it was -- that it's another, another
4 different route.

5 **Q.** You were concerned that the name would suggest that the
6 buying process favoured a particular subset of sellers?

7 **A.** Yes -- sorry, yes, I don't have my list in front of me.
8 There's a whole list of things I was worried about.
9 Principally that it would give the wrong impression to
10 everybody.

11 Now, calling it a "high priority" -- so important to
12 recognise, I think, the word "lane" was only introduced
13 by the NAO when they did their report some months later.
14 At the time -- colleagues will know better, and can talk
15 to my Lady more about this -- it was called the "VIP" or
16 whatever -- whatever, or "high priority". Now, that is
17 helpful in, frankly, calming down an irate multinational
18 chief executive who has written to their MP or whoever.
19 It is very unhelpful in the context of we're discussing
20 it here for exactly the reason we're discussing it here.

21 **Q.** You were also concerned that it was a "very important
22 person" rather than "product" lane, weren't you?

23 **A.** Well --

24 **Q.** The focus was on an individual person rather than the
25 product being offered?

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1 we'd talked about. And I asked if we could change the
2 name and I was told no, this is already set up and
3 running, it's been communicated out to other offices,
4 you know, it is what it is.

5 So at the time I was, you know, running the
6 ventilator programme, you know, full pelt, but it was
7 very clear, you know, that ship had sailed.

8 **Q.** Well, you had a two-minute conversation with
9 Dame Emily Lawson about it, didn't you?

10 **A.** No, I -- well, I can't remember. I didn't note who
11 I was talking to. I mean, I remember it was
12 a discussion as I walked from my kitchen to my office,
13 and it was "We've been asked to set up a lane, you know,
14 a team called the High Priority team or the VIP team",
15 I can't remember the exact --

16 **Q.** You say at 47 of the same statement, your 14 January
17 statement, which I've described as the HPL statement,
18 INQ000536362:

19 "I do remember asking if we could do something about
20 the name, however I was told that it was too late as it
21 was up and running and widely communicated. If it had
22 been called an 'enquiry response handling' team or
23 similar, I think it would have avoided a lot of the
24 negative implications and consequent interest which has
25 arisen since. I cannot recollect whether I expressed my

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1 **A.** Well, that was my concern, that that would be the
2 implication of the word "VIP".

3 **Q.** But that was certainly the appearance?

4 **A.** Yes, and I think -- I'm afraid I was right. It would
5 have been better, had we been able to do it, to have
6 a team who just handled the handling aspect of these
7 chasing completely separate from anyone involved in
8 procurement. Not staffed by any staff with the
9 procurement qualification. That, I think, would have
10 shown a firebreak between chasing and progressing. But
11 at the time, we didn't have the people and things moved
12 too fast.

13 **Q.** You were right that it would give rise to the appearance
14 of preferential treatment to certain individuals. We'll
15 move on tomorrow to whether there was any actual
16 preferential treatment as a result of the VIP or HPL,
17 the VIP Lane or the High Priority Lane. But before
18 we -- if we could just finish on one point -- I note the
19 time.

20 In relation to the concerns you had about the name,
21 just the name, did you act upon those concerns?

22 **A.** Yes, so I got a call about this around, I think -- you
23 know, shortly after it was set up, and, as I described
24 it to other colleagues, I think my first reaction was
25 Anglo Saxon in expression, because of the risks that

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1 surprise verbally or in a text or email, but since
2 I cannot find an email relating to this at the time
3 [there it is up on the screen] ... I note that in
4 January 2021 I made a similar point by email ..."

5 That was the extent of what you attempted to do
6 about its name, wasn't it?

7 **A.** Yes.

8 **Q.** And you had no objective basis, did you, for concluding
9 that offers that came in via the HPL, that referred in
10 to the HPL, were better or worse than offers received by
11 other ways? You had no objective basis for concluding
12 that, did you?

13 **A.** I think the smaller -- sorry, the non-priority lane, the
14 other lane -- again, colleagues who were actually
15 working those cases would know this much, much better
16 than I do -- but my impression was that a lot of those
17 were for very small amounts. Some people offering to
18 hand-make scrubs, which was brilliant and helpful, but
19 was never going to do it. So it was much more likely,
20 I thought at the time, that corporates would have asked
21 someone in their office to find the email of the
22 minister or the officer -- I mean, these are available
23 on gov.uk.

24 So -- but that was the limit of how I thought
25 about it.

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1 **MR WALD:** All right.
 2 My Lady, I note the time, would that be a convenient
 3 moment to adjourn?
 4 **LADY HALLETT:** Certainly.
 5 You've obviously been warned; I do try to avoid
 6 having witnesses come back overnight but I'm afraid it
 7 proved impossible. I did ask some time ago whether we
 8 could get through you in one day, but I hope you don't
 9 mind coming back tomorrow.
 10 **THE WITNESS:** No, no problem. These are important matters.
 11 **LADY HALLETT:** Thank you very much indeed. I shall return
 12 for 10.00 tomorrow.
 13 **(4.31 pm)**
 14 **(Hearing adjourned until 10.00 am the following day)**
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