



**NOTICE OF DETERMINATION  
CORE PARTICIPANT APPLICATION  
MODULE 5 - PROCUREMENT**

1. In my Opening Statement on 21 July 2022, I explained that Modules would be announced and opened in sequence, with those wishing to take a formal role in the Inquiry invited to apply to become Core Participants for each module. On 24 October 2023 the Inquiry opened Module 5 and invited anyone who wished to be designated as a Core Participant to that Module to submit an application in writing to the Solicitor to the Inquiry by 17 November 2023.
2. On 27 February 2025, the Inquiry received an application from PPE Medpro Ltd (“Medpro”), Baroness (Michelle) Mone and Douglas Barrowman (the “Applicants”) for Core Participant status in Module 5 (the “Application”). On 28 February 2025, I declined the application for the reasons set out in my [Determination](#) (the “28 February Determination”). In correspondence with those acting for the Applicants, the Inquiry indicated that the 28 February Determination was final and consequently there was no mechanism to renew. On 3 March 2025, the Inquiry received a renewed application for Core Participant status (the “Renewed Application”).
3. Module 5 has held two preliminary hearings in public on 6 February 2024 and 11 December 2024. The substantive hearings for Module 5 started on 3 March 2025.
4. The Inquiry’s [Core Participant Protocol](#) states that the Inquiry will not consider applications that are outside of the timescales provided by it unless the applicant provides an acceptable explanation as to why they did not submit their application within the relevant timeframe.
5. As I noted in my 28 February Determination, the Application was made significantly out of time. The deadline for applications for Core Participant status in Module 5 was 17 November 2023. The Application was received on 27 February 2025, 468 days after the expiration of the deadline and three days before the commencement of the public hearings. It did not explain why it was made out of time. I set out at paragraphs 9 to 14 of my 28 February Determination the reasons why I declined to consider the Application out of time.
6. There are strong reasons for managing the timings for applications for core participant status within specific windows. It ensures that there is certainty for interested individuals and/or organisations as to when their applications will be considered and who will be involved in the Inquiry, that the Inquiry’s resources are

deployed appropriately and that the strict timings for the running of the Inquiry can be adhered to. In short, it contributes to the effective running of the Inquiry. I see no reason to diverge from this practice on this occasion and strong reasons against doing so.

7. Following the closure of the Core Participant window, preliminary hearing and publication of Scope, the module identified lines of investigation, collected and reviewed documentary evidence and sought witness statements from relevant individuals and organisations. Module 5 has had additional complexities due to the degree of complex sensitive information and ongoing criminal investigations (not just those related to the Applicants). This means that the process of review and disclosure of relevant material takes additional time and resources. The hearings in Module 5 had commenced when the Renewed Application was made. The Applications have caused a diversion of resources from the hearings at a critical juncture in proceedings.
8. To allow it to proceed further would lead to further diversion and cause significant disruption to the timetable. In short, it would undermine the efficient running of this investigation. This exemplifies the reasons why the Inquiry does not generally allow applications declined on grounds that they are made out of time to be renewed; late applications are disruptive.
9. Nevertheless, I have considered whether fairness requires me and on an exceptional basis to permit the Applicants to renew in this case. Doing so has caused me to consider the reasons now provided by the Applicants for their late Application.
10. The Applicants state in the Renewed Application that they are *“the most high profile corporate and natural persons to be associated with alleged PPE procurement fraud, and the only ones (along with their direct associates) to be both sued and/or criminally investigated by the state in respect of PPE supplies at the height of the pandemic.”* They acknowledge that they were aware of the Inquiry and that there would be a module on PPE procurement. It was open to them to apply for Core Participant status during the application window given the very significant role they assert that they played; but they did not do so. Nor did they do this at any point in the following 468 days that followed.
11. Module 5 held its first preliminary hearing on 6 February 2024. Mr Wald KC, Counsel to the Inquiry, explained that there were ongoing criminal investigations and that the Inquiry would liaise with relevant bodies in order to understand the stage which they were at and relevance to the Scope of the Module. The preliminary hearing was broadcast on YouTube and the transcript was also published on the Inquiry’s website. In light of what the Applicants say about being the only ones being both sued and/or criminally investigated, this clearly would have put them on notice of the scope of the investigation. Again, they did not apply for Core Participant status.
12. The Applicants state that it was not publicly announced that ‘PPE Medpro’ would be specifically considered by the Inquiry until the second preliminary hearing on 11 December 2024. They did not apply for Core Participant status for a further 79 days.

Even if I were to accept what the Applicant has said regarding the delay before 11 December 2024, which I do not, this additional delay is fatal to their explanation as to why the Application is made out of time.

13. Finally, the Applicants state that I should have brought the Inquiry's interest in PPE Medpro to their attention so that they could consider whether they wanted to apply for Core Participant status. As set out in my 28 February Determination, the focus of this module is on the systems and processes that were in place and I do not consider it necessary to seek evidence from suppliers of PPE. The Inquiry conducts its work in public and rightly expects those with a potential interest in it to follow the information which it posts on its website, which is available to all. All other applicants for designation as Core Participants have done so and it is not the Inquiry's practice to alert possible applicants that an application window has opened on an individual basis.
14. Given the focus of Module 5, I do not expect it will be necessary for me to say anything that criticises the Applicants in my Module 5 report. If, contrary to that expectation, I am minded in due course to make any explicit or significant criticism of them, I am obliged in any event to send them a warning letter in accordance with rule 13 of the Inquiry Rules 2006, which would alert them to my concerns and allow them to make representations in response.
15. Accordingly, I consider that fairness does not require me to permit the Applicants to renew the Application notwithstanding the usual rule. My decision therefore remains as set out in my 28 February Determination and I do not permit it to be renewed.

**Rt Hon Baroness (Heather) Hallett DBE**  
**Chair of the UK Covid-19 Inquiry**  
**11 March 2025**