

Witness Name: Dawn Matthias

Statement No.: 1

Exhibits: 65

Dated: 13 March 2025

## **THE UK COVID-19 INQUIRY**

### **MODULE 5**

#### **WITNESS STATEMENT OF DAWN MATTHIAS**

I, Dawn Matthias, will say as follows:

#### **INTRODUCTION**

1. I am a civil servant currently working as a Commercial Deputy Director at the Crown Commercial Service. As the Inquiry knows, whilst the relevant period identified by the Inquiry is between 1 January 2020 and 28 June 2022 ("the relevant period") during the relevant period I was working at the Department for Education ("DFE") and it was between around 23 March 2020 and July 2020 that I was seconded to the Department of Health and Social Care ("DHSC") as a Caseworker working on PPE procurement, to assist with the Government's response to the COVID-19 pandemic. I am a Member of the Chartered Institute of Purchase and Supply ('MCIPS').
2. I have worked in procurement for more than 25 years across a variety of sectors. I have predominantly worked in procurement within construction and facilities management in both the public and private sector. I have had both operational and strategic roles. Operational roles involved checking paperwork, sending out purchase orders and tracking deliveries. Strategic roles were more senior and have involved line management, allocating roles, authorising invoices and designing procurement exercises. By 'designing procurement exercises' I mean identifying the procurement stages, the number of companies to be approached and the time taken for each stage.

3. I make this statement pursuant to the Inquiry's request for evidence dated 23 December 2024 in relation to Module 5: Procurement (**'the Rule 9 Request'**).
4. I have made this statement with the support of the Government Legal Department, and Counsel. Those assisting me with the statement have sought to identify the documents and correspondence relevant to the Inquiry's Terms of Reference for Module 5. All the information below is based on my own knowledge, where I have relied upon information provided by other people, I have identified who provided me with that information wherever possible.
5. To assist the Inquiry as fully as possible, I have set out a few background comments below before considering the areas I am asked to comment on within the Rule 9 request.

## **BACKGROUND**

6. The Inquiry will be well aware that I, and other members of the procurement team, were operating in a very high-pressure environment. I would like to say a few words describing what it was like for me. I volunteered to assist with the pandemic response because of my background in procurement and I was keen to assist with sourcing materials as quickly as possible.
7. My role as a Caseworker was limited to making contact with the supplier, receiving their documents and once the file was ready, passing it onto Technical Assurance ("TA"). Whilst I was never responsible for assuring documents, I was aware of the type of documents that TA required and therefore would advise potential suppliers where they needed to provide more detail (for example, [DM/1 INQ000565154]). A typical email I would send is contained at [DM/2 INQ000565356] where I drafted a pro-forma for a member of my sub-team to use:
 

"Good Morning Bill,

Further to recent communications, I am making contact to hopefully take forward the potential PPE opportunity. If you are in agreement I would suggest the approach we may take is to be focus on the current high priority items which we are looking to source at the moment and commence the first stage of the process which we are following, which is the technical product assurance review, the step required prior to being

able to progress to ordering stage.

As such the below is the requirement to satisfy this initial stage

2

Technical product specification

- CE marking
- Any certifications – NO REDACTED INFORMATION AS THIS WILL BE REJECTED
- Product photograph

If you are able to arrange the issuing of the above to myself for the following items please

- Gowns
- Aprons
- Gloves
- Type IIR masks
- Clinical waste bags
- Sanitiser

The link below within my signature will direct you to the relevant product specifications Thanks in advance.

Kind Regards

Dawn Matthias-Jackson MCIPS"

8. The reference in the above to a 'link' was to the government webpage on gov.uk which contained all of the specifications for all of the products that we were seeking, available for any member of the public to read.
9. Once I became responsible for a case, I would be the main point of contact for that potential supplier. I would occasionally chase TA on behalf of suppliers and occasionally provide feedback from TA to suppliers.
10. The demand for personal protective equipment ('PPE') was exceptionally high and particularly at the start of the pandemic we had to source large amounts of stock for all areas. There were a large number of offers and people wanting to help. This generated a considerable volume and intensity of work, as I describe further, below. Despite those offers of help the situation was dire at points. For example, on 14 April 2020 I wrote to Wendy Burdon ensuring that the Ministry of Defence team who were about to assist with technical assurance (described below) were informed that we only had one days' worth of gowns left [DM/3 INQ000575153].

11. Initially, there was no High Priority Lane ('HPL'). My recollection is that it started approximately two weeks into the first lockdown. I have been provided with email correspondence dated 2 April 2020 introducing me to Max Cairnduff [DM/4

3

**INQ000575152]** and prior to that date I was working with Hannah Bolton. At a time after the HPL was stood up, I became the team leader for Category 5 Referrals. This was informally described as the 'VVIP' referrals and I have described its purpose in more detail later. However, when the HPL was "stood up" I retained responsibility for some non-HPL cases as well [DM/5 INQ000575149] [DM/6 INQ000575151]. My team was made up of me and a series of rolling recruitments, many of whom did not stay in the role for very long, so any list of the total number of people who worked on the HPL should take into account that a number of them will only have been there for a short time. Whilst I predominantly worked on the HPL full-time during this period, my team mates in the same sub-team were only seconded to the HPL. Whilst I was managing up to 40 potential suppliers at any one time, my colleagues in my sub-team were handling only a handful (approximately five). For some, they were not particularly familiar with procurement so I would often have to do quite a lot of 'hand-holding' whilst managing my own cases.

12. As I was working on a large number of cases and suppliers were keen to secure business, I was fielding a large volume of telephone calls and emails on a daily basis. It was challenging work because I had to keep track of a large number of cases and deal with lots of interruptions. It is important to remember that when suppliers were commissioning large amounts of PPE from China and elsewhere abroad, they would have been likely to have reserved capacity at a factory and were themselves under pressure to confirm the order as soon as possible. It was suppliers more than referrers who put pressure on me. I have no reason to believe that suppliers acted differently on the non-HPL lane. My limited experience of non-HPL cases was that they could be as persistent as HPL ones.

13. Some suppliers could be very robust and assertive when speaking to me. As someone who has worked in procurement for a long time, I was somewhat used to this behaviour. However, it did wear me down over time. I was aware that the NHS were in competition with other countries for PPE and that if supplies were not secured, they would likely go elsewhere [DM/7 INQ000575446] I was also aware that the NHS were running very short of certain stocks. On 20 April 2020, we were provided with a

briefing by Defence Equipment & Support, in which they described the situation in the following terms [DM/8 INQ000565066]:

“But it is a sellers market, dominated by overseas manufacturers and the whole world is buying in that market”

4

14. At one point I remember being informed (I cannot remember who by) that there were fewer than ten body bags in the whole UK and that airplanes were being considered as temporary morgues as they had powerful air conditioning.
15. It was very hard work and at the time I was working 12 to 15 hours a day and often working 7 days a week to work through potential cases. I was at points not able to keep up with the volume of emails [DM/5 INQ000575149]. During this time, I (as I expect many working on the response to the pandemic did) found myself needing to cancel periods of annual leave, though I did so willingly if it meant I could get more PPE into the country [DM/9 INQ000565391]. I would describe myself as having exceptionally little “head-space” to think beyond those immediate tasks needed to fulfil my role.
16. Working in procurement for the DHSC during the pandemic was a very challenging time for me and once I left, I very much put it behind me. I have had the benefit of reading some of the emails that I sent and received at the time and that has helped jog my memory, some five years later. However, there are still some gaps in my recollection, so I have referred to emails I sent at the time whenever possible (but I do not pretend that my recollection is perfect).

## **TRAINING**

17. Whilst I was able to draw on my experience in procurement (as outlined at para 2, above), I received only limited training from DHSC and that was focussed entirely on how to use the Mendix system and the requirements of TA. It was an informal and iterative process where we learnt mainly from each other and ‘on the job’ as the period went on. There was no action plan to deal with an emergency procurement exercise like this. We received some training emails in relation to Mendix, which contained instructions on how to use the system and when we would be fully transferring on to it, for example at [DM/10 INQ000565061]. There was nothing else I would have expected to be trained on.

18. I would informally train and guide members of my sub-team but that would mostly take the form of answering their questions.

### **HIGH PRIORITY LANE**

5

19. I understand the inquiry is interested in the differences between the High Priority Lane ("HPL") and procurement outside it for processing offers of supply of key healthcare equipment and supplies including Personal Protective Equipment ("PPE"). I should say at the outset that we did not speak in terms of a High Priority Lane. We used the terms VIP or high priority appraisal in our work. I have used the term HPL in this statement for all those cases that were allocated a caseworker without having to enter information on Mendix.
20. It is important to state at the beginning that I had relatively limited experience of offers outside the HPL so my knowledge of that process is necessarily limited. I lost sight of them once Mendix was used. The experience I did have was predominately at the start of the pandemic and the experience of being a supplier outside the HPL may have been quite different later on. At the start of my time on the HPL I juggled both HPL and non HPL cases [DM/5 INQ000575149]. Non-HPL cases I had later in the relevant period would either have been those I had been assigned at the start, but which had not yet been resolved, or non-HPL offers I had picked up where there was a particular need for a specific product / type of PPE. That said, I treated both my HPL cases and my non HPL cases the same (save that in relation to the latter there was no referrer to provide feedback to, if it were wanted). I was never told to prioritise the HPL cases above the non-HPL cases, or vice versa.
21. As far as I can recall, there were similarities between HPL and non-HPL. These were: a. All offers would have a caseworker. HPL cases would be allocated to a caseworker via the process set out in the paragraph below, after having been received and picked up by a more senior team member such as Max Cairnduff or Wendy Burdon (as far as I am aware, non-HPL cases would be allocated to caseworkers by their team leads: the team lead would identify them as a priority, triaged from the spreadsheets or Mendix). The allocated caseworker would make

contact with the firm, and provide a direct email address and telephone number to ensure that the firm could contact their caseworker quickly. In an email dated 27 April 2020, I described myself as the “conduit between legal, finance and procurement” [DM/11 INQ000565095]. Sometimes it was actually quite difficult to contact a firm as we would normally only have an email trail to work from [DM/12 INQ000565187]. I would be the named caseworker on both my HPL and my non-HPL cases, and in the latter as well as the former suppliers would contact me directly;

6

- b. All offers had to pass the TA process and were subject to the further checks and discussions in closing.
- c. As a caseworker, I would take into account the same factors when considering whether or not to prioritise an offer whichever route the case had entered by. These were: whether the product offered was in high demand, the number of items potentially available, the proposed price points, the apparent willingness to provide technical information, and the likely lead times.

22. The HPL had a number of features. These were:

- a. Once a referral was made to the HPL, that ‘case’ would have an allocated caseworker before information was entered onto the system. These allocations were made by a colleague, Wendy Burdon who reported to Max Cairnduff.
- b. The expectation from Mr Cairnduff was that we would contact firms referred to us within 24 hours. In contrast, suppliers seeking contracts through the non HPL would have to enter their own details into the form and then wait their turn before being contacted by a caseworker. I have addressed the 24 hour target below.
- c. The allocated Caseworker would ask questions and fill out the standard questionnaire on behalf of the firm. In contrast, my understanding of the non HPL firms was that, in order to register themselves as a potential supplier, they would have filled out the online questionnaire themselves.
- d. As well as collating information for the approvals process, we would also monitor that approval process and be the key point of contact if either the firm or the referrer wanted an update whilst a firm was being assessed for approval, or if TA required more information [DM/13 INQ000565215]. However, it was not our role to chase an offer or negotiate price, once it had

made it past technical assurance [DM/14 INQ000565257]. Sometimes, we would never find out if a proposal that passed technical assurance would become a firm offer.

23. I have mentioned above that there was a 24 hour target to make initial contact with suppliers on the HPL. I often (about 20% of the time) did not manage to meet that target. If I did make contact within the 24 hours, it might be by way of a 'holding email' to acknowledge receipt of the offer. This would usually be the case if the offer were not a good one (i.e. for a priority product in the right sort of quantities), though if it were for the wrong sort of goods entirely (such as the wrong kind of fabric) we would likely shut it down immediately. If it were a more substantive reply, it would be seeking information about the offer, often so that we would have the kind of information about the offer at

7

this stage as we would have got through the webform. The most important factor when deciding whether to turn to an offer first for this initial contact would be if it was for a priority item, so that our prioritisation would correlate with our demand. Once that issue had been dealt with, I would manage my workload as effectively as possible and a lesser factor for me to consider at that point might be how much pressure I was getting from a supplier or (more rarely) a referrer. By dealing with those first I might lessen the amount of emails I was getting in (I would not however typically prioritise one referrer over another just because of their status).

24. Though I have been asked questions about the order in which I would take cases, there was no set list for me to work through and so it was not so orderly as thinking that a case was being 'bumped up the queue'. I should also note that I am only describing here the order in which I would turn to files in the course of a day. That is to say, I would seek to deal with all of my pressing tasks each day, and if pressure from a supplier caused me to turn to it before another case it would only really affect the speed with which I had addressed it by a matter of minutes or hours. As below, I was in contact with suppliers directly on both the HPL and the non-HPL routes so might be receiving such pressure for responses from suppliers on either route.

25. As I have described above, my understanding of the non-HPL process was that it was less personalised at the data collection stage. I have been asked whether this may have had some influence on whether a supplier was ultimately passing through closing stages, and consider that it might have done if, for example, a supplier from a non-HPL firm were to enter incorrect information into a form or use the wrong box. As a



caseworker processing an offer from an HPL firm, I may have caught an error earlier on in the process, as I was the one entering their details on the Mendix system but that is just speculation. A Non-HPL supplier could potentially have been disadvantaged due to the time taken to process their offers (i.e. if demand for a certain item had been satisfied as a result of the speedier contact made with a HPL supplier, by the time the Non-HPL caseworker got to the Non-HPL supplier that product may not have been required) but that is again, just speculation.

26. I have no direct knowledge of how offers came to enter the HPL. As stated above we were allocated work by my colleague Wendy Burdon who reported to Mr Cairnduff. The “sifting” as to whether an offer was eligible for the HPL and the VVIP team occurred before my involvement. However, I can comment in general terms that the biggest factor (it appeared to me) was the status of the referrer. Specifically, if the referrer came from

8

the office of a member of the House of Commons or House of Lords, or if they were known to the DHSC, Cabinet Office or No.10, then the case appeared to be allocated to the HPL. This can be seen by my summary of my cases on 1 April 2020 [DM/15

**INQ000575438** When a case came from a member of the House of Commons or the House of Lords it was not always the case that the member of the House of Commons or the House of Lords actually referred the case. Often cases were simply forwarded by their office. [DM/16 **INQ000575447**

27. The terms VIP and High Priority were used interchangeably. We did not speak in terms of lanes at the time. The term VIP was used more frequently. We used to use a ‘#VIP’ designation on Mendix. The purpose of the #VIP was to identify firms eligible for the HPL. A firm would be given this designation if they had been allocated to the HPL; the criteria for deciding whether a firm was eligible for the HPL is set out in my response above. Everyone who used Mendix (including senior decision makers) would have been aware of the designation.
28. An offer with the #VIP designation would potentially move through the pre-assessment stage (i.e. the information collation stage I was involved in) quicker as it would have the support identified above. That could mean failing quickly as the supplier was unable to collate the paperwork or it could mean going through to TA. I do not however know how quickly high quality non-HPL cases which had been “picked up” by caseworkers trying to identify strong bids would have gone through the pre-assessment stage, so I am unable to comment with any certainty.

29. I have been asked whether HPL cases could be expedited at the TA stage. We were able to ask for all cases potentially to be expedited at the TA stage. For example, we would have daily “stand-up” calls where caseworkers would provide updates on their cases, and we would update our teams on whether an offer had advanced to the contract team. We had the ability to chase TA to prioritise certain cases but we would do that for both HPL and non-HPL cases where I was getting ‘heat’ from either referrers or suppliers but also because an offer appeared credible, high volume and useful.

30. On 7 April 2020 at 14:30hrs [DM/17 INQ000533876] I received an email (sent to myself and colleagues) from Mr Cairnduff in which he asked for us to let him know which of our cases in TA were particularly “high profile or high credibility” noting also that there was a backlog/delays with the TA team. I now understand (having been shown the emails by those assisting me) that on 9 April 2020, Mr Cairnduff had exchanged emails with David

9

Moore [DM/18 INQ000575440] and that in those emails, they had confirmed the position that TA were not prioritising based upon whether a matter was marked as VIP.

31. Also on 9 April 2020, I had received an email following the daily 09:30am call, in which provision of aprons, gowns, body bags and cleaning equipment was highlighted as a priority [DM/19 INQ000575442]

32. On 10 April 2020 (at 10:19hrs) in an email to Hannah Bolton and Mr Cairnduff, I raised concern about the number of cases that were currently sitting with TA [DM/20 INQ000575443] I then forwarded the email (a minute later at 10:20hrs) to Wendy Burdon and said:

“FYI – Sent out of frustration and also given that Max in CO has asked me to prioritise some of the VIP cases through TA”

I do not now recall these emails, or the precise context, save that when I sent the email to Wendy Burdon on 10 April 2020, I would not have been aware of the correspondence between Mr Cairnduff and David Moore the day before.

33. Wendy Burdon replied (at 10:33hrs) on 10 April 2020, and said:

“Also, as of this morning they’ve [TA] been told to prioritise any cases that are offering gowns, aprons, chlorine tablets, and detergents, and to prioritise them over and above VIP cases, unless those VIPS are offering those products!

They are asking please if we can also prioritise those products and look through our cases to see if there is anyone offering such things that we could fast track. Apparently there is only about 3 days worth of gowns left in the supply chain!”

34. Following this (four days later, on 14 April 2020) [DM/21 INQ000575150], I sent an email in which I recommended to Mr Cainduff that certain cases with offers of gowns, including at least one in the non-HPL, should be prioritised by TA. Although we could request that an offer be expedited by TA for various reasons, it was wholly up to TA what order they took cases in and I would not have expected them to necessarily process a HPL case over a better non-HPL offer. When I did ask them to expedite an offer, sometimes I would then receive an update (at that time or days later) and sometimes I would not.

10

Sometimes it was clear that there was a systems issue or technical glitch as to why the offers I was chasing had not been dealt with before and I was able to resolve that so that they could proceed (see for example [DM/22 INQ000565148], where cases had been ‘locked’ and where I had received ‘heat’ from the supplier - again, this involved both HPL and non-HPL cases). I am unable to speak to whether the TA or ordering teams routinely prioritised cases based on #VIP designation. I was never told of any system whereby TA were prioritising HPL cases. Although we had an individual in TA whom we could contact if needed, I was not told that the purpose of that contact was to push HPL cases through the system quicker than other cases (and he did not treat my HPL cases differently to my non-HPL cases, as best I can tell).

35. As far as I can recall, there was no explicit designation of “VVIP” on Mendix or elsewhere. However, I did lead a small team who were given the name “VVIPs”. I explained the meaning of VVIP at the time, 28 April 2020, to a colleague on my sub team:

“They are “Very Very Important People” Basically suppliers who have made contact with us directly via a MP, Lord, Lady PM private office etc. As such Cabinet Office are

keen that they receive a speedy response from us in terms of taking their potential offers of support forward.” [DM/23 INQ000565104]

36. Further example of cases deemed suitable for VVIP can be found in the following documents:

- a. [DM/24 INQ000565162] – Reference from Duchess of York
- b. [DM/25 INQ000565172] - Reference with media connections (BBC Health Editor)
- c. [DM/26 INQ000565092] – Reference with media and political connections (Bear Grylls’s mother)
- d. [DM/27 INQ000565216] – Reference from a member of the House of Lords e. [DM/28 INQ000565127] – Reference from a member of the House of Lords for an opposition party who suggested he would raise the issue with a select committee.
- f. [DM/29 INQ000565070] - Apparent track record of supplying other governments
- g. [DM/30 INQ000565279] – Reference to a complex case with political interest which required an experienced Caseworker.
- h. [DM/31 INQ000565284] – Reference to a case that had implications for international relations.
- i. [DM/32 INQ000565354] - Case had interest from a minister
- j. [DM/33 INQ000565462] - A constituent or someone with no personal connection to referrer

11

37. Many of the referrals were of dubious quality and they were often unable to provide the required paperwork [DM/34 INQ000565440] [DM/35 INQ000565356]. However, that was also true of the non-HPL offers.

38. I believe that my sub-team was set up for a couple of reasons. It was probably useful for Mr Cairnduff and others to know straight away who was dealing with referrals that came from No.10 or the Cabinet Office. It was also a useful way of showing referrers that their suggested supplier was being taken seriously and therefore discourage them from pestering for updates. As far as I can recall, offers that were designated VVIP and dealt with by my team had the same treatment as other offers in the HPL.

39. The HPL had three main purposes:

- a. The primary purpose of the HPL (and of the wider procurement exercise) was to secure PPE and other medical supplies at speed and in the necessary volume. Firms which had the most capability were the most likely to have existing relationships with Government and the HPL was a means of processing their offers as quickly as possible.
- b. It was important to remember that many Tier 1 suppliers were likely used to a personalised experience and the UK may have missed out if that was not available. Suppliers may have gone to other countries if they found them easier to deal with. A number of suppliers did state that they had rival offers at the time. [DM/36 INQ000565310, DM/37 INQ000565368]
- c. The other purpose of the HPL was to manage stakeholders. Within the Government and Parliament, there are lots of people who expect instant (or near instant) answers and for their view to be taken seriously. If the HPL did not exist as a means of meeting that expectation, those individuals were likely to still request frequent and detailed updates and this, if not managed properly, could be a significant distraction from procurement. By having a bespoke service, high profile stakeholders could be satisfied that their proposals were being taken seriously without having to chase for updates. I understood the

12

HPL as a means of reducing stakeholder contacts rather than encouraging them.

40. I described my experience to a colleague on 31 March 2020 [DM/38 INQ000565319] in the following way:

“Some days I feel like I'm in a looney bin. I was promoted yesterday to the VIP supplier Team, basically allocated to dealing with the suppliers who feel it is important for them to contact Boris, Matt Hancock, Gove, Gareth & other Minister etc directly. So now basically jumping through hoops to get quick responses to them before they complain that we are not taking it seriously. Only one so far has proved any use.”

41. The reference to the “looney bin” is not the sort of language I normally use, and I hope

the Inquiry will understand the exceptional pressure we were under. I wanted to convey how bizarre it was working in PPE procurement at this stage. We were receiving offers from established contractors in PPE, established firms seeking to assist by diversifying (e.g. uniform manufacturers willing to produce gowns) but we were also being contacted (particularly at this early stage) by people who were obviously well meaning but had absolutely no idea what production of PPE involves, but thought they could help.

42. I described my experience in similar terms to a colleague on 20 April 2020 [DM/39 INQ000565309]:

"I am assigned to what has been termed VIP suppliers, who are the ones who believe they are too important to complete a survey as they have a link to a Minister or know Matt Hancock/Michael Gove/Jeremy Hunt etc and as such cabinet office ask us to contact them within 24 hours to ensure that they do not make much noise!!"

43. To manage my workload I would occasionally prioritise those cases that chased me most persistently. These chasers could come from the supplier themselves or the referrer by email or by telephone (for example, [DM/40 INQ000575441], [DM/41 INQ000575444] & [DM/42 INQ000575445] When a chaser came from a referrer, that would come through the Cabinet Office rather than the referrer contacting me [DM/43 INQ000565113]. The only exception was [NCA RO] who did contact me directly [DM/44 INQ000575439]. The vast majority of chasers came from the supplier. By

13

dealing with those cases first, I could then deal with other suppliers with fewer interruptions and deal with more cases overall. An example of this is the chase that came from a supplier who threatened to copy in the office of Robert Jenrick MP [DM/45 INQ000575154], [DM/46 INQ000575155] & [DM/47 INQ000575156].

44. Whilst there were occasions on which I would prioritise based on the persistence of the supplier, that was second to other factors such as whether we needed the product in the first place (and the other factors I have set out at paragraph 21(c), above). I was comfortable saying to persistent suppliers and those who came from high status referrers that we would not be proceeding with their offer (for example if we already had an ample supply of the product they were offering, or if they did not meet TA's

specifications [DM/48 INQ000565092]). I do not recall needing to send referrals up to Mr Cairnduff for example if they were disappointed or were particularly persistent.

45. The information I had on what were the priority supplies and which we did not need came from Mr Cairnduff and his team. My recollection was that they were provided with that information from the NHS.

46. The technical specification guidelines ('the specifications') were supplied by the NHS through their clinical and product assurance ('CaPA') programme. This would include a list of evidence requests such as certifications of CE standards or ISO standards. This role was then transferred over to the Ministry of Defence when they took over in early April 2020 (I cannot recall the precise date).

47. However, it is important to note that I was not responsible for verifying that all product requirements were met. From my experience working in procurement I was familiar with technical specifications and product documentation, and I could normally tell if necessary information was missing, and I would check that an offer was "ready" to proceed to the next stage, but the final checks were done by others [DM/49 INQ000565408].

48.

**NCA RO**

14

49.

**NCA RO**

50. There is, however, another context. I had experienced things which were deeply

unpleasant. Richard James was a member of my sub-team and would have been familiar with the pressure of the role, and when I referenced matters that I wish I had not seen and heard, I was also referring to the borderline abusive contacts we had from suppliers who were frustrated with the time taken to process their offers and to place orders. Some were very frustrated and would threaten to mention the time taken to their referrers which would include members of the Government. Some suppliers did not like having to go through technical assurance since they strongly believed that their product was compliant. As I was their only named contact (we did not pass on the contact details of members of the TA team) I received the brunt of their frustration. I would like to repeat that I acknowledge that many of these suppliers may have reserved capacity with manufacturers and so were under pressure themselves to secure the orders.

51. Whilst my time outside the HPL was limited, I did have non-HPL suppliers throughout April 2020 and I can recall that other suppliers could be just as robust as the suppliers I dealt with on the HPL.

52. I think it is important that I bring to the Inquiry's attention that I also wrote an email the same day an hour later at 17:20hrs [DM/51 INQ000565242] to my colleague Thady Senior at the DFE:

"I would love for an FOI to be put in after all of this to see the % of orders for PPE raised with the VVIP suppliers/those with party connections. I suspect it would be on the high side based on what I have seen going on"

53. Mr Senior replied 10 minutes later [DM/52 INQ000565246] and stated:

"Definitely a things for mates... lots of back scratching"

15

54. Although only sent an hour later, the context to this later email is different. Mr Senior was not involved in procurement for PPE at the time (although he did work in procurement). Judging by the time of the email it is likely that I would have just come out of a "stand up" meeting where we would report on the progress of our cases that day. As well as being involved in VVIP cases, I was also by this stage involved in rapid response cases where we would try to complete all stages including document collation, technical assurance, and conclusion of contract award all in a single day [DM/53 INQ000565227]. In those cases, I was aware of the outcome. However, in



non-rapid response cases (the vast bulk of my work), I would not hear if an order had been placed by the commercial team. It was in that context that I was curious about the percentage of offers that I had dealt with that finally translated into orders. At the start of the email chain that I sent to Mr Senior I commented on how successfully we had secured a large amount of PPE in a short period of time. I was curious as to what proportion of 'my' cases had contributed to that total. I was proud that we had managed to achieve so much.

55. Having been asked to reflect by the Inquiry on whether those suppliers who had access to the HPL had special treatment, I have to say it is possible that they did receive special treatment in the context of the speed with which their offers were processed. As well as getting assistance with filling out forms and getting earlier directions regarding the necessary paperwork, they would have a point person at an earlier stage, though I have discussed the practical impact of that at paragraphs [23 and 24] above. I would occasionally ask TA to prioritise certain cases where I was receiving pressure [DM/54 INQ000565074], [DM/55 INQ000565275], DM/56 INQ000534950]. However, it is important to state that all suppliers were, as far as I was aware, held to the same standards regarding technical assurance, cost and lead times [DM/21 INQ000575150]. I have described it before as priority processing of offers on the HPL. However, as I mentioned at paragraph 28 above, I was not aware of any analysis at the time of the relative speed with which HPL and non-HPL cases went through the system and I am not able to speak in general terms as to how quickly they went through. Some of my HPL cases took some time and I was also aware of backlogs on the HPL [DM/57 INQ000534950].

56. That said, if there was an advantage in speed it is fair to say that some suppliers who were not on the HPL may have missed out on opportunities since the high priority products might have changed by the time they got to the front of the non-HPL queue after the "buy anything you can" instruction was suspended after the middle of April

16  
2020. As I stated earlier, this personalised treatment was necessary to meet supplier's expectations and we may not have secured as much PPE as we did if we did not have the HPL. However, it is also important to note that where there was a particular demand for a product, those of us working on the HPL would look at non-HPL suppliers too, in order to provide a strong field of files to TA to prioritise for their consideration. This may therefore have mitigated the potential disadvantage to non-HPL suppliers to some extent. See [DM/21 INQ000575150]. There was an element of chance, in that sometimes goods became high-priority offers on a certain

date, so slower offers which were still in the system would be picked up and purchased in line with demand.

57. At the time, I had very little 'head space' to think about whether a better system could have been set up in a short period of time. Having reviewed my correspondence at the time, I can see from email trails that some individuals approached ministers through their personal email addresses [DM/58 INQ000565085].

58. I did not receive any guidance during the relevant period on what constituted a conflict of interest. However, as a Member of the Chartered Institute of Purchase and Supply I undertake annual continuous professional development which includes training on conflicts of interest and I had and have a clear understanding of what constitutes a conflict. Trying to recollect, there are only a few suppliers that stand out as ones that I thought possibly went beyond the "rough and tumble" of high pressure sales. They were: a. Rockster

b. **NCA RO**

c. Mr Andrew Morris - Referral came from Robert Jenrick MP's office.

59. I was concerned about Rockster as their offer was considered [DM/59 INQ000565265] (I cannot recall the final outcome) even though they were providing a product which I recall we might have got sufficient supplies of. However, it was for others within the NHS/DHSC in charge of inventory to finally decide whether there was a need. I believe we were working towards securing at least three months' supply.

60.

**NCA RO**

17

61. I was concerned about Mr Morris because his persistence was extreme and he threatened to report me to Mr Jenrick when he met him later that evening in one phone call. I thought his behaviour was unfair.

62. I did not raise any of these concerns with regards to Rockster or **NCA RO** as I did

not think they warranted further investigation particularly at a time where the priority was sourcing stock. With regard to Mr Morris, I did not think anyone would benefit from a complaint. With regard to Rockster, I assumed that a commercial officer would not go through with an order if there was genuinely no need.

63.

**NCA RO**

**NCA RO**

**[DM/60 INQ000533416]**

64.

**NCA RO**

65. At the time, I did not have any concerns about conflicts of interest or direct financial links between referrers and suppliers. It was clear that suppliers were often friends or constituents of referrers. I was reassured that commercial due diligence was done before an order was placed.

66. At the time, I did not have any concerns about the level of due diligence applied. All offers had to pass technical assurance and financial vetting. I was not instructed to do any further due diligence. The priority was getting cases ready for technical assurance as quickly as possible. For particularly strong offers we would try and do that within a day under the rapid response team.

18

67. I have reflected on whether with the benefit of hindsight we should have had greater due diligence with regard to offers. I think we got the balance right. As I have noted, all offers were subject to technical assurance and financial vetting. We simply did not have the capacity to do any greater due diligence and even if we did, it would have

slowed down very important orders. Particularly at the start of the pandemic, the situation was dire and we were genuinely worried about running out of vital equipment such as body bags and masks.

### **CHINA WHITELIST**

68. The Chinese Government had an approved supplier listed and this was commonly referred to within the procurement team as the China Whitelist [DM/61 INQ000565181]. I do not know the origins of the Whitelist or the criteria for inclusion. My understanding of its purpose was to weed out inferior manufacturers. I described the Whitelist in an email sent on 11 May 2020 NCA RO

“We are also working from the “White List” of manufactures which are the organisations that the Chinese Government have accredited to be able to export. This approach was introduced on the 26th April so we appreciate that not all manufacturers in China have been able to gain the accreditation yet. As such if the manufacturer in question in this instance is not yet appearing on the white list, we may be able to proceed if they can demonstrate that they are in the application process”. [DM/62 INQ000565450]

69. I would have shared the China Whitelist with my sub-team as part of my role as team leader [DM/63 INQ000565204].

70. My understanding was that it was not within the DHSC's gift to request acceptance on the Whitelist. My understanding was that the firms had to apply themselves. I remember a few firms commenting that it would not be an issue to join the Whitelist. From that I inferred it was not an onerous process.

71. If an offer was made before 26 April 2020, we did not check the offer against the Whitelist. For offers made after 26 April 2020 we did consider offers not on the Whitelist. However, offers were made on the condition that the firm was accepted onto the China

19

Whitelist. [DM/64 INQ000565252]. Technically, it was not a requirement to join the China Whitelist but, since the vast majority of products were manufactured there, it

was effectively a requirement [DM/65 INQ000565287].

## **CONCLUSION**

72. There are no other matters I wish to draw to the Inquiry's attention. I am happy to answer any further questions the Inquiry may have.

Signed:

**Personal Data**

Dated: 13th day of March 2025