

Witness Name: Pauline Shepherd

Statement No.: 1 (Module 5)

Exhibits: 1-176

Dated:21.02.25

UK COVID-19 INQUIRY

WITNESS STATEMENT OF PAULINE SHEPHERD

I, **Pauline Shepherd**, of independent health and care providers, c/o UHY Hacker Young Fitch, Gordon Street Mews 27-29 Gordon Street, Belfast, BT1 2LG, will say as follows:-

1. I am the Chief Executive Officer ('CEO') of independent health and care providers ('ihcp'). I have been in this role since May 2014.
2. I write this Statement in response to the letter from the Inquiry dated 29th August 2024.
3. I have been asked specifically to write this Statement and provide documentary evidence in relation to the procurement and distribution of key healthcare equipment and supplies including PPE, ventilators and oxygen, lateral flow tests and PCR tests during the 'Specified Period' (that being, 1st January 2020 – 28th June 2022).
4. ihcp was established in 1997 as a non-profit making membership organisation representing private, not-for-profit, charity and church-affiliated organisations providing residential and nursing home care, sheltered housing, day care and care in the home. The independent sector provides services to over 50,000 people across Northern Ireland every day and employs over 34,000 people. 15,000 of the 16,000 care home beds in NI and over 70% of the overall homecare support is provided by the independent sector.

Introduction

5. The aim of ihcp is to influence positive change that enables members to provide and maintain good quality services through building constructive engagement with the key

policy decision makers on social care. ihcp increases public awareness through regular media engagement and working closely with all stakeholders on social care issues including Regulation and Quality Improvement Authority ('RQIA'), Commissioner for Older People Northern Ireland ('COPNI'), Public Health Agency ('PHA'), Department of Health, Northern Ireland Social Care Council and Northern Ireland Health Trusts. ihcp has an alliance with the Homecare Association and is also a member of the Five Nations Care Forum. This Forum enables representative care organisations for Scotland, Republic of Ireland, Northern Ireland, Wales, and England to explore emerging models of care delivery, registration, regulation and government policy and identify areas of common concern; promoting inter-country collaboration where this is of value to service users and citizens.

6. ihcp is governed by a Board of Directors who are members of ihcp and are elected or re-elected to their role by members at each Annual General Meeting. The composition of the Board would have changed during the course of the pandemic. The current Board of Directors consists of the following members:-

- Cathal O'Neill – Director and Treasurer;
- Fiona McAnespie –Director and Secretary;
- JP Watson – Director;
- Ryan Williams – Director;
- Carol Cousins- Director;
- Dr Marina Lupari -Director;
- Jacqui Timony – Director;
- Patricia Doyle- Director;
- Wendy Waddicor – Director;
- Richard Porter – Director;
- Ryan Smith – Director;
- Linda Graham- Director.

The Executive Team consists of the following independent appointees:

- Pauline Shepherd - part-time CEO;
- Heather Sleator - part-time consultant;
- NR - part-time administrative support.

7. ihcp has 271 members, consisting of 80 residential care homes, 127 nursing care homes and 64 homecare providers (domiciliary care). Members provide services to

older people and adults with learning disabilities. Members range in size from large care home groups to single care homeowners. Homecare service providers also range in size. All members provide services located across all six counties in Northern Ireland.

Prior to the pandemic

8. I have been asked to comment on the contingency stocks of PPE that ihcp members had in place to deal with pandemics or epidemics in respect of emergency stocks of key medical equipment and suppliers, including PPE, prior to the Covid-19 pandemic. I have no information relating to PPE stocks prior to the pandemic.
9. I have been asked if ihcp is aware of any policies or guidance issued by the Department of Health, the NI Executive, NHS or any other Government Department, arm's length body or regulator which required the care sector to have in place contingency plans for stocks of key health care equipment and supplies. I am not aware of any such policies or guidance.
10. I have been asked to confirm whether, prior to the pandemic, the care sector generally purchased its key medical equipment and supplies on the private market, or whether any local authority or Government departments assist in the purchase of such items. I confirm that care providers purchased their own PPE from private suppliers. I am not aware of any PPE being supplied by Health Trusts.

During the pandemic

11. The experiences of ihcp members during the pandemic were gathered via ihcp directors, from answers to questions issued to all ihcp members, and from individual emails directly to me from ihcp members. I represented ihcp members views and concerns directly with Department of Health and other bodies on PPE and testing, and have outlined these in the following paragraphs.
12. On 20th February 2020, I was copied in on email from an ihcp member, acting on behalf of ihcp, who provided an estimation of the number of social care workers and nurses employed in the independent sector to Sam Waide, Director of Operations at Business Services Organisation, HSC. This information was sent by email and copied

to me and was for the purpose of estimating PPE requirements (Exhibit PS/1 (pages 1-3) – INQ000536167).

13. By letter dated 6th March 2020, I wrote to the Health Minister requesting a meeting with ihcp (Exhibit PS/2 (pages 4-5) – INQ000536168). The purpose of this meeting was to discuss a number of issues regarding the care home and homecare sector and the reform of adult social care services in Northern Ireland. On 20th March 2020, I received a response from Ms Kim Burns, Private Secretary to the Health Minister (Exhibit PS/21 (page 78) – INQ000536187). Ms Burns advised that due to significant pressures on the Minister's diary relating to developing situation caused by the Covid-19 virus, he was unable to meet with me at that time. I was asked, however, to resubmit my request to the Minister when the current situation had resolved.
14. On 12th March 2020, the Chief Social Work Officer ('CSO'), Department of Health, issued interim guidance to registered providers, entitled '*Interim Guidance for social or community care and residential settings on COVID-19 at 12/03/2020*' (Exhibit PS/3 (pages 6-17) – INQ000536169). This guidance confirmed that:-
 - During normal day-to-day activities facemasks do not provide protection from respiratory viruses, such as Covid-19 and do not need to be worn by staff. Facemasks are only recommended to be worn by infected individuals when advised by a healthcare worker, to reduce the risk of transmitting the infection to other people;
 - Independent providers are responsible for sourcing their own PPE equipment. However, in the event that they are unable to source the appropriate items Health and Social Care Trusts have been asked to ensure they work closely with independent providers to ensure they have the appropriate equipment available to them if suspected or confirmed cases of Covid-19 arise.
15. On 13th March 2020,
 - a. I sent an email to the Department of Health, regarding the sourcing of PPE (Exhibit PS/4 (pages 18-19) – INQ000536170);
 - b. I received a response from the Department of Health, advising as to the appropriate person to contact (Exhibit PS/5 (page 20) – INQ000536171);

- c. I sent a further email to the Department of Health seeking advice on this issue and asking that a centralised approach needed to be taken (Exhibit PS/6 (page 21) – INQ000536172);
 - d. I sent a further email to the Department of Health asking that I be informed as to BSO's response regarding PPE and that the feedback I received was that providers could not source PPE (Exhibit PS/7 (page 22) – INQ000536173);
 - e. I received an email from the Department of Health advising that the guidance issued says that if providers cannot source their own PPE they should work with the Trusts (Exhibit PS/8 (page 23) – INQ000536174);
 - f. I sent an email to the Department of Health advising that providers are reporting not being able to source PPE (Exhibit PS/9 (page 24) – INQ000536175);
 - g. I received a response from the Department of Health, stating that the Trust would still utilise the buying power of the HSC, using BSOs expertise and buying power, and that it was unlikely BSO could engage directly with all the providers separately (Exhibit PS/10 (page 25) – INQ000536176).
16. On 16th March 2020, I received emails from the Department of Health regarding a meeting to discuss coronavirus guidance for the independent sector (Exhibit PS/11 (page 26) – INQ000536177). I also received a copy of the draft guidance for care homes and homecare services (entitled '*COVID-19: Guidance for Nursing and Residential Care Homes in Northern Ireland*' and '*COVID-19: Guidance for Domiciliary Care Providers in Northern Ireland*') which was shared in strict confidence. This was provided in advance of my attendance at a meeting later that day to discuss the guidance. (Full copies of the guidance documents are shown at Exhibit PS/12 (pages 27-48) – INQ000536178). I attended the meeting on 16th March 2020 and outlined my concerns about the guidance. These concerns included the overall shortage of PPE and that providers were unable to source PPE, the need for additional oxygen/paracetamol and antibiotic supplies to care homes and the need for a pre-admission screening method. I was not provided with any minutes of this meeting for agreement.
17. On 17th March 2020, I received an email from the Department of Health, enclosing a letter the Chief Social Work Officer (CSO) sent to 'Registered Providers' together with the issued guidance entitled '*COVID-19: Guidance for Domiciliary Care Providers in Northern Ireland*' and '*Covid-19: Guidance for Nursing and Residential Care Homes*

in Northern Ireland', both dated 17th March 2020 (Exhibit PS/12 (pages 27-48) – INQ000536178). This guidance included a key message that 'independent providers must work with suppliers to secure an adequate supply of PPE but will be supported by Trusts where they are unable to source items.' Under 'infection control and use of PPE', it confirmed that if neither care worker nor the individual receiving care is symptomatic, then no personal protective equipment is required above and beyond normal good hygiene practices.

18. On 18th March 2020,
 - a) At 15.45, I was copied into an email from an ihcp director to Mark Lee regarding shortage of PPE supplies, and pointing out that this provider is the largest care home provider in NI with access to UK wide suppliers yet cannot source PPE. The email asked for clarity on the PPE situation and where it is to come from (Exhibit PS/14 (pages 52-54) - INQ000536180);
 - b) At 20.59, I sent an email to Mark Lee expressing concern about the lack of guidance and PPE for domiciliary (homecare) workers when providing care to a symptomatic client and that I had received calls from care homes stating that they had no PPE. I received an email response from the CSO advising that, in respect of PPE, Trusts are being told to consider their independent provider partners alongside their own needs. (Exhibit PS/13 (pages 49-51) – INQ000536179). I sent a further email to the CSO expressing concern about employees in the vulnerable category being asked to provide care for clients without proper PPE (Exhibit PS/15 (pages 55-56) – INQ000536181);
 - c) I sent a further email to Mark Lee forwarding an email from an ihcp care home member as an example of the issues that were happening on the ground regarding lack of PPE (Exhibit PS/16 (pages 57) – INQ000536182).
19. On 19th March 2020, I sent a further email to Mark Lee, forwarding a homecare member's comments regarding lack of PPE and the impact on provision of homecare services (Exhibit PS/17 (page 58-59) – INQ000536183).
20. On 19th March 2020, I attended and provided a briefing to the Northern Ireland Assembly Committee for Health, by remote session. The official Hansard transcript

of the Health Committee proceedings is shown at Exhibit PS/18 (pages 60-72) – INQ000536184). During the briefing, I raised a number of concerns including: -

- Timely and consistent guidance and contact support from the PHA, RQIA and the Department of Health;
- Shortage of Personal Protection Equipment ('PPE');
- Medical supplies (oxygen, paracetamol and antibiotics);
- Testing of new admissions to care homes.

21. On 20th March 2020, ihcp sought and received feedback from members on the situation with PPE (Exhibit PS/19 (pages 73-74) – INQ000536185). By email dated 23rd March 2020, I provided a copy of the feedback to Mark Lee and the CNO (Exhibit PS/25 (pages 84-85) – INQ000536191).

22. On 20th March 2020, I sent an email to Mark Lee seeking clarification that the Minister's announcement confirming the move to test healthcare workers included social care workers. He confirmed that he thought it did, but would check and come back to me. I sent a further email later that day seeking an answer. Mark Lee sent a further email advising that a paper was being considered today and that he would chase if not received (Exhibit PS/20 (pages 75-77) – INQ000536186).

23. On 22nd March 2020:

- a. The ihcp board confirmed approval from ihcp funds to purchase £10,000 of PPE for distribution to members due to the lack of availability from suppliers and Trusts (Exhibit PS/22 (page 79) – INQ000536188);
- b. I emailed Mark Lee and CSO expressing concern about the number of calls I was receiving from members about the shortage of PPE and asking if ihcp could work directly with BSO to secure supplies for members. Suppliers were advising independent providers that they had to supply the public sector first (Exhibit PS/23 (page 80) – INQ000536189);
- c. I emailed Sean Holland and Mark Lee forwarding an email that I had received from an ihcp member to a number of Trust contacts, raising concerns about lack of PPE for care homes and asking for a pathway for accessing testing for nurses and care staff pending the set-up of Covid-19

testing hubs. Mark Lee responded stating this was helpful to see and that he would call me to discuss (Exhibit PS/24 (pages 81-83) – INQ000536190).

24. On 23rd March 2020,

- a) I emailed Mark Lee asking again if ihcp could work directly with BSO on the issue of PPE and including feedback from a number of members regarding PPE supplies (Exhibit PS/25 (pages 84-85) – INQ000536191). Mark Lee responded asking if I had pointed members to the PPE guidance as FFP3 masks should be irrelevant unless homes are doing AGP's, which he felt they shouldn't be. I responded advising that FFP3 masks were required in confirmed cases and that we have a home with 2 confirmed cases and without testing we do not know if others are affected. I received a further email from Mark Lee regarding the guidance, following which I sent a further reply (Exhibit PS/26 (pages 86-87) – INQ000536192);
- b) I received an email from Olive MacLeod, CEO at RQIA attaching a letter that the CSO had issued to RQIA, Trust CEO's and HSCB advising that RQIA would be taking a lead role in supporting independent providers (a copy of that email and letter can be seen at Exhibit PS/30 (pages 94-97) – INQ000536196). I had a subsequent telephone call with Olive MacLeod advising that I supported the efforts being made but that the priority is to sort PPE, testing and relaxation of regulations, concerns about PPE for homecare workers, and the risk of transmission given that the medical advice is that homecare workers do not need masks;
- c) I received an email from Olive MacLeod RQIA providing me a copy of the RQIA service calls update which indicated that PPE is the most frequent issue being reported (Exhibit PS/27 (pages 88-89) – INQ000536193);
- d) I emailed Mark Lee to provide him with an email that had been issued from NHSCT to homecare providers accepting that PPE is a real issue and in particular access to fluid shield masks and they are working to secure a consistent supply (Exhibit PS/28 (pages 90-91) – INQ000536194);
- e) I emailed Mark Lee, referring to a previous call that day on the matter of PPE when he had stated that the issue of supply of PPE to Homecare services

was only identified now and that involvement of the independent sector with BSO was not really successful. I included and referred him to an email dated 20th February 2020 in which BSO had been advised of the numbers of employees in Homecare by a representative of the independent sector (Exhibit PS/29 (page 92-93) – INQ000536195);

- f) A joint letter from ihcp and several homecare provider members was sent to the Health Minister and senior officials, setting out the sector's dissatisfaction and frustrations surrounding a range of issues including: -
- Protection of homecare workers and PPE guidance
 - The need for covid specific teams to manage symptomatic clients
 - Testing for staff and clients.

A copy of this letter can be seen at Exhibit PS/31 (pages 98-100) – INQ000536197). As a result of this letter, a meeting between ihcp and the Health Minister took place. I was not provided with any minutes of this meeting for agreement.

25. On 24th March 2020, I sent an email to Mark Lee expressing concern that the advice to domiciliary care workers that they don't need PPE, is not sufficient and we urgently need to issue water repellent masks to care homes and domiciliary care services and that the situation with staff isolating is critical (Exhibit PS/32 (pages 101-102) – INQ000536198).
26. On 25th March 2020, I sent an email to Olive MacLeod, Mark Lee and Brendan Whittle expressing continued anxiety about PPE, advising that ihcp had purchased 10,000 fluid repellent masks for distribution to members and providing an example from a member who had received a supply of five masks from the WHSCT for a 9 bed care home. Mark Lee responded advising that stockpiles won't yet have flowed through the system and it was helpful to know that Trusts are issuing PPE (Exhibit PS/33 (page 103-104) – INQ000536199).
27. On 26th March 2020, I received an email from Mark Lee, including links to videos on effective and appropriate use of PPE during the pandemic and confirming that homecare workers needed to use masks only if the client was showing symptoms of

Covid (Exhibit PS/34 (pages 105-106) – INQ000536200). These videos were issued to ihcp members (Exhibit PS/35 (pages 107-108) – INQ000536201).

28. On 26th March 2020, I received a letter from the Health Minister in response to ihcp's engagement with Departmental Officials on a number of issues of concern (Exhibit PS/36 (pages 109-113) – INQ000536202).

This letter confirmed several commitments including: -

- New mechanisms for oversight of Trusts meeting requests for PPE, which should include how they are meeting requests from the independent sector;
- The introduction of Covid-19 specific teams to provide domiciliary care to clients in their own homes who are symptomatic;
- The expansion of testing of health and social care workers.

29. On 27th March 2020, I received an email from the Department of Health enclosing a copy of a letter from the CSO to HSC Trust Chief Executives, regarding domiciliary care provision (Exhibit PS/37 (pages 114-117) – INQ000536203). Within that letter, the CSO drew attention to (and enclosed a copy of) the Health Minister's letter dated 26th March (as above). The CSO also addressed issues concerning PPE provision and the need for Trusts to work together, supported by HSCB to ensure that there are clear points of contact in each Trust, that PPE is available when it is needed and that there is a consistency of approach between Trusts. I also received an email from the CNO, enclosing updated guidance on visiting in hospitals and care homes issues, entitled 'Covid-19 Draft Visitors Advice' (Exhibit PS/38 (pages 118-120) – INQ000536204).

30. On 28th March 2020, I received an email from the Department of Health, enclosing guidance from the CMO on PPE, entitled '*HSS(MD)19/2020 – Personal Protective Equipment (PPE) – update to service*' (Exhibit PS/39 (pages 121-126) INQ000536205).

31. On 29th March 2020, I sent an email to the CNO and Department of Health about the impact of news on visiting and availability of PPE (Exhibit PS/40 (page 127) – INQ000536206). I received a reply from Mark Lee advising that a letter on PPE and testing is likely to be issued tomorrow (Exhibit PS/42 (pages 130-131) – INQ000536208).

32. On 30th March 2020, I emailed Mark Lee seeking an update on the letter and asking for an update on PPE distribution and testing. Mark Lee replied stating that medical colleagues were clearing this for issue, and that it would be out soon (Exhibit PS/41 (pages 128-129) – INQ000536207).
33. On 1st April 2020, I received an email from an ihcp director confirming that there had been lots of discussions regarding discharges to care homes and the need for compulsory testing as a result of changes in other jurisdictions (Exhibit PS/43 (pages 132-184) – INQ000536209).
34. On 3rd April 2020,
- a. I sent an email to Olive MacLeod (RQIA) and Rodney Morton (HSC), and copied to Mark Lee, seeking clarification on PPE updated guidance and expressing concern about the availability of PPE to meet the guidance. Mark Lee responded stating that PPE requirements for homecare services haven't changed significantly and they would work today and over the weekend to consider how they would communicate this in an accessible way (Exhibit PS/44 (pages 185-186) – INQ000536210).
 - b. I emailed Mark Lee seeking a clear statement on PPE updated guidance as staff on the ground had been watching the media and seeking more PPE. I asked for reassurance to the staff or an increase in the supply of PPE (Exhibit PS/45 (pages 187-188) – INQ000536211).
35. On 4th April 2020, I emailed Paula Bradshaw MLA thanking her for her help in sourcing PPE and that I had been able to collect a supply of PPE from her contact Quinn Building Supplies. I advised that I was surprised by the Health Minister's statement to the Health Committee that day that there is sufficient PPE as that is not the experience on the ground (Exhibit PS/51 (pages 215-217) – INQ000536217).
36. On 6th April 2020,
- a. Paula Bradshaw MLA emailed me to ask if the sector had been promised a supply of PPE from the consignment that has arrived in NI today. I responded to confirm that I knew nothing about this and there had been no

communication. On 7th April 2024, Paula Bradshaw confirmed that she would raise this directly with the Department of Health through the NI Executive (Exhibit PS/51 (pages 215-217) – INQ000536217);

- b. At 10.16, I received an email from an ihcp director advising that BHSCT had confirmed that they would not be issuing the new guidance to providers as they did not have enough PPE and they were interpreting the guidance as surgical masks needed for every call (PS/48 (pages 209-210) – INQ000536214). At 10.31, I sent this email to the RQIA and PHA, and copied to Mark Lee (Exhibit PS/48 (page 209-210) – INQ000536214);
- c. At 11.03am, I received an email from Mark Lee attaching a copy of the 'New Covid Guidance for domiciliary Care Providers in Northern Ireland' with tracked changes relating to PPE guidance. The email asked for my comments by 5.00pm (PS/46 (pages 189-206) – INQ000536212). At 11.39 I received an email from Mark Lee confirming that the incorrect guidance had been attached and replacing it with another version (PS/47 (pages 207-208) – INQ000536213). I responded at 14.03 confirming that I could not meet the deadline as I would need time to discuss with a few of our members and asking for confirmation that PPE would be available to meet any changes in PPE guidance (Exhibit PS/47 (page 207-208) – INQ000536213);
- d. At 11.53, I received an email from Mark Lee, advising that the revised UK wide guidance is on the gov.uk website and that it is not for the Belfast Trust to send out guidance to the homecare sector (Exhibit PS/48 (pages 209-210) – INQ000536214);
- e. At 16.24, I received an email from Mark Lee, enclosing a press release from the Department of Health entitled 'Minister visits PPE distribution centre as NHS deliveries begin'. I was asked by when I could provide my comments (Exhibit PS/49 (pages 211-212) – INQ000536215);
- f. At 21.11, I emailed Mark Lee confirming that I hoped to reply to his email for comments on the new domiciliary care guidance the following day. I raised initial concerns about the guidance not being specific, including phrases such as 'where possible'. I stated that guidance had issued from PHA in the form of a flyer this evening which clearly states that masks must be worn in

all circumstances. This was being issued to all recipients of care. I asked that PPE must be on the ground immediately to meet public expectations (Exhibit PS/50 (pages 213-214) – INQ000536216);

- g. I also received emails from PHA at 18.11 and 18.43 regarding PPE, I emailed Rodney Morton that evening (Exhibit PS/52 (pages 218-226) – INQ000536218).

37. On 7th April 2020, I emailed ihcp directors to gather information in preparation for a telecon meeting with CNO and Mark Lee the next day. The information which I requested related to PPE guidance and availability (Exhibit PS/53 (page 227) – INQ000536219).

38. On 7th April 2020, I emailed Mark Lee with feedback on the revised domiciliary care guidance. This feedback included concerns about PPE and testing (Exhibit PS/54 (pages 228-229) – INQ000536220).

39. On 8th April 2020,

- a. At 14.16, I provided an email update to ihcp directors regarding my meeting with the CNO and Mark Lee. This meeting included concerns about PPE guidance, inconsistency in Trusts approach and PPE quality (Exhibit PS/55 (pages 230-231) – INQ000536221);
- b. At 15.43, I emailed Mark Lee to provide him with PPE calculation assumptions for care homes and homecare. At 16.19, I received a response from Mark Lee confirming calculations (Exhibit PS/56 (pages 232-234) – INQ000536222);
- c. At 16.35, I emailed Mark Lee to advise that the Southern Health and Social Care Trust (SHSCT) had advised all care home managers that they move to amber level PPE guidance (Exhibit PS/57 (pages 235-236) – INQ000536223);
- d. At 16.51, I received an email from Mark Lee advising of a new system for accessing PPE (Exhibit PS/58 (page 237) – INQ000536224);

- e. At 17.36, I received an email from CNO to advise that the traffic light system for PPE guidance was not approved and should not have been issue. I replied by email at 20.31, asking how it was planned to recall this guidance (Exhibit PS/59 (pages 238-240) – INQ000536225);
 - f. At 21.25, an email was issued to ihcp members seeking an update on the PPE situation (Exhibit PS/60 (page 241) – INQ000536226).
40. On 9th April 2020,
- a. At 11.55, I emailed RQIA stating that I was inundated with issues from members, mostly about PPE, and that the Department of Health had asked me to collate these and feed them through. At 12.00, I received a response from RQIA, confirming that this was duplication of effort and the issue would be highlighted at a meeting with the Department of Health imminently (Exhibit PS/61 (page 242) – INQ000536227).
 - b. At 12.43, I emailed Mark Lee and copied the CNO, confirming that I was gathering information but that I had also been in contact with RQIA as issues would be raised via the RQIA partner hub. I gave further feedback from members on PPE shortages (PS/62 (page 243) – INQ000536228). At 12.46, I sent a further email to Mark Lee (copying the CNO), with another example ahead of the wider collection (PS/63 (pages 244-245) – INQ000536229). At 12.51, I received a response from Mark Lee confirming that he had raised the PPE issue with the South Eastern Trust as they were the only Trust that he was not confident about providing a buffer of PPE stock (Exhibit PS/64 (pages 246-247) – INQ000536230). At 13.16 and 13.20, I sent a series of emails to Mark Lee and CNO regarding PPE shortages, need for FFP3 masks, confusion over guidance and problems with accessing fit testing (Exhibit PS/65 (pages 248-253) – INQ000536231).
 - c. At 16.43, I emailed Mark Lee and the CNO providing feedback on PPE and attaching a copy of the feedback (Exhibit PS/66 (pages 254-259) – INQ000536232). At 16.48, I sent an email to Mark Lee and the CNO, forwarding further feedback from members (Exhibit PS/67 (pages 260-262) – INQ000536233).

- d. At 22.48, I was copied into an email between an ihcp director and Mark Lee commending the SET support to a care home with a significant outbreak. A new process had been put in place and it was confirmed that all PPE requests would be processed and ready for collection tomorrow (Exhibit PS/69 (pages 265-266) – INQ000536235).
 - e. At 23.05, I received an email from Mark Lee replying to my email to him on 7th April 2020 regarding feedback on the revised domiciliary care guidance (Exhibit PS/68 (pages 263-264) – INQ000536234).
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- 41. On 10th April 2020, I sent an email to the CNO referring to a previous case in an email on 9th April 2020, regarding lack of FFP3 masks. Staff had been fit tested but no masks. CNO and Mark Lee both followed up by email to the Trust to address (Exhibit PS/70 (pages 267-272) – INQ000536236).
 - 42. On 10th April 2020, I emailed the CNO and Mark Lee confirming that I had received positive feedback from ihcp directors on movement on PPE delivery. There were, however, still existing areas of concern (Exhibit PS/71 (pages 273-280) - INQ000536237). At 14.53 I emailed the CNO regarding the need for staff to be re-fit tested for FFP3 8833 masks (Exhibit PS/72 (page 281) – INQ000536238). I received a response from Mark Lee on 11th April 2020 (Exhibit PS/73 (page 282-287) – INQ000536239). On 11th April 2020, I forwarded to Mark Lee further feedback from ihcp members (Exhibit PS/74 (pages 288-289) – INQ000536240). Mark Lee provided a response that day, following which I emailed on 12th April 2020 (Exhibit PS/75 (pages 290-293) INQ000536241).
 - 43. On 10th April 2020, I emailed CNO and Mark Lee confirming that PPE was flowing out to providers but there remained confusion over some of the guidance and seeking assistance to sort this issue (Exhibit PS/75 (pages 292-293) – INQ000536241).
 - 44. On 15th April 2020, I received an email from Mark Lee regarding testing and some confusion over communication on the extension of testing to all symptomatic residents in care homes. It seemed Trusts were taking different approaches to swabbing and there was a need to standardise things (Exhibit PS/76 (page 294) – INQ000536242).

45. On 16th April 2020, I sent an email to CNO and Mark Lee following up on some issues regarding PPE guidance. I confirmed there had been a flow of PPE to care homes and home care providers but there remained a range of interpretations on guidance between Trusts. I also asked for an update on progress (Exhibit PS/77 (page 295) – INQ000536243).
46. On 20th April 2020, I wrote to the Health Minister expressing serious concerns about a number of issues the sector was facing, and sought urgent consideration of, and assistance to find urgent solutions for, the pressures being faced by care homes and homecare (Exhibit PS/79 (pages 338-340) - INQ000536245). These pressures included the following: -
- Continued replenishment of PPE and clarity on PPE guidance;
 - Concerns about how a policy on testing for residents was being implemented and managed;
 - Criticality of pre-admission testing of patient discharged from hospitals to care homes;
 - Possibility of care homes refusing admission to care homes where they see a risk to current residents;
 - A request for a meeting with the Health Minister, following on from my request on 6th March 2020 which had been refused due to the pressures of Covid-19.

I did not receive any response to this letter. The above issues were, however, taken up with Departmental Officials.

47. On 20th April 2020, I received an email wrongly headed 'revised dom care guidance' from Mark Lee. This email was seeking feedback on attached revised care home guidance. I was asked to provide feedback on the guidance the following day (Exhibit PS/78 (pages 296-337) – INQ000536244).
48. On 20th and 29th April 2020, I was in text communication with the Health Minister's Special Adviser, Mr Mark Ovens regarding a meeting with the Minister (Exhibit PS/80 (pages 341) – INQ000536246). On 29th April 2020, I had a telecon with the Health Minister and his Special Adviser. During this call, I discussed with the Minister issues around testing, PPE and funding pressures in both Care Homes and Homecare services. I did not receive any minutes of this meeting for agreement.

49. On 22nd April 2020, I emailed Mark Lee with feedback on the revised care home guidance (referred to and attached later) This feedback included concerns about testing residents entering care homes from the community, challenges in isolating residents with dementia, only symptomatic residents being tested, PPE inconsistent guidance (Exhibit PS/81 (pages 342-343) – INQ000536247).
50. On 24th April 2020, Mark Lee emailed me with responses to the issues I had raised about the revised care home guidance (Exhibit PS/82 (pages 344-345) – INQ000536248). I responded that day, asking for a one-page flyer to address inconsistencies in PPE guidance (Exhibit PS/83 (pages 346-347) - INQ000536249). Mark Lee responded confirming that a PPE guide was going through a formal endorsement process for NI (Exhibit PS/84 (pages 348-349) – INQ000536250).
51. On 26th April 2020, new 'Covid-19 guidance for nursing and residential care homes' was issued, including an enhanced testing regime. The document also updated guidance on PPE, testing of all staff and residents where a home is in outbreak and isolation of all discharges from hospital to care home for 14 days irrespective of a test result (Exhibit PS/85 (page 350) – INQ000536251, Exhibit PS/86 (pages 351-354) – INQ000536252, and Exhibit PS/88 (pages 357-400) – INQ000536254).
52. On 27th April 2020, a press release issued by the Health Minister announcing support for care homes including that provision of PPE to care homes is a priority and Trusts will work with care homes to ensure there is a buffer of PPE stock. It also confirmed the new testing regime (Exhibit PS/87 (pages 355-356) – INQ000536253).
53. On 30th April 2020, I sent an email to Mark Lee expressing concern about press interest and the lack of answers on a number of issues, including testing. I received an email response from Mark Lee following up on a few of the issues (Exhibit PS/89 (pages 401-406) – INQ000536255).
54. On 11th May 2020, I sent a further email to Mark Lee seeking an answer on testing and re-testing protocol (Exhibit PS/90 (pages 407-408) – INQ000536256). I am unable to locate a reply.
55. On 13th May 2020, I received an email from the Department of Health, enclosing a letter from the CNO dated 11th May 2020 (Exhibit PS/91 (pages 409-417) – INQ000536257). This letter provided an update to visitor guidance for end-of-life

patients and enclosed a document entitled '*Principles for End of Life Care: Facilitating Patient Visiting at end of Life during COVID 19 Pandemic*'. This included reference to PPE.

56. On 14th May 2020, I sent an email to PHA, HSCB and Mark Lee referring to a briefing on 12th May 2020 on the Care Home surge plan. I provided further comments on PPE and testing (Exhibit PS/92 (pages 418-421) – INQ000536258).
57. On 15th May 2020, I received a telephone call from the Clerk of the Northern Ireland Assembly Committee for Health, requesting that I provide a written brief on the Covid-19 disease response in the independent sector. I spoke with the Assembly clerk that day regarding the Assembly's expectations for the meeting. I then received an email from the Assembly clerk forwarding me a copy of the Department of Health News Release dated 13th May 2020 (Exhibit PS/93 (pages 422-428) – INQ000536259). Thereafter, I received a call from the NI Assembly Clerk on 15th May asking me to attend on 21st May 2020.
58. On 15th May 2020, I received an email and action note from the briefing meeting on 12th May 2020 (Exhibit PS/94 (page 429) – INQ000536260) and Exhibit PS/96 (pages 432-445) – INQ000536262).
59. On 15th May 2020, I sent an email to the CNO and Mark Lee, copying correspondence that was issued to providers from Northern Health and Social Care Trust (NHST) advising an urgent product recall of 11R Mask (brand DSBJ) (Exhibit PS/95 (pages 430-431) – INQ000536261).
60. On 18th May 2020, I provided an outline brief to the Northern Ireland Assembly Committee for Health in advance of the Committee meeting on 21st May 2020 (Exhibit PS/97 (pages 446-450) – INQ000536263). This brief included an update on some of the issues raised during the Health Committee meeting on 19th March 2020, including:-
 - PPE;
 - Testing issues;

I also outlined the current focus and way ahead in respect of the following issues: -

- The need to reduce the risk of transmission within, and entering into, care homes;
 - Antibody testing;
 - Rolling programme of repeat testing challenges;
 - 'Safe Homes' project (staff 'live in' options pilot);
 - Mobile testing and outreach teams.
61. On 18th May 2020, I received a copy of the Health Minister's announcement regarding the roll out of testing to residents (Exhibit PS/98 (page 451) – INQ000536264).
62. On 21st May 2020, I attended and provided a briefing to the Committee for Health. The official Hansard transcript of the Health Committee proceedings is shown at Exhibit PS/99 (pages 452-462) – INQ000536265.
63. During the briefing, I provided an update on the issues raised during the Committee briefing on 19th March 2020 (including in relation to PPE and testing). I also addressed issues of current focus, including antibody testing, testing/rolling programme, 'Safe at Home' project, pre-admission testing and outreach teams. A series of questions were asked by Members of the Legislative Assembly ('MLAs') and answered during the briefing, including the following: -
- Measures that could be taken to reduce the ability of Covid-19 entering the care home sector;
 - Testing, including pre-admission testing to nursing and care homes;
 - Provision of PPE.
64. On 22nd May 2020, I emailed Mark Lee and copied to the CSO and the Minister SPAd to ask if there was any clarity on the testing and re-testing policy, and raising concerns about delays in results and inconsistency in approach. A number of emails followed seeking clarification and an email from Mark Lee on 26th May 2020 confirmed that he had some of the information but was waiting for sign off on how much detail could be shared I responded advising that I was looking for the roll out plan (how, when, how often etc) (Exhibit PS/100 (pages 463-472) – INQ000536266).
65. On 27th May 2020, I received an email from Mark Lee confirming that there was still ongoing discussions about exactly what the programme of testing in care home looks like (Exhibit PS/101 (pages 473-474) – INQ000536267).

66. On 31st May 2020, I emailed Mark Lee and advised that there remains a lot of confusion about the different processes for testing and that I have an urgent call with the Minister the following day and will be raising my concerns (Exhibit PS/102 (pages 475-476) – INQ000536268).
67. On 1st June 2020, I attended a teleconference with the Health Minister regarding testing policy. During this meeting, I raised issues regarding Covid free residents going into a Covid positive Emergency Department, which was reported to PHA. I was not provided with any minutes of this meeting for agreement. I provided an email update to ihcp directors following the call with the Minister (Exhibit PS/103 (pages 477-478) – INQ000536269).
68. On 28th July 2020, I was invited to a teleconference briefing by the CMO, regarding the regular programme of Covid-19 testing for all care homes (commencing on 3rd August 2020). That teleconference briefing took place on 28th July 2020, during which we discussed the testing policy in care homes. I expressed my concerns regarding the extremely short lead in time, capacity to carry out testing, preparation/assessment for readiness and the challenge of repeat testing on dementia and learning disability residents. I was not provided with any minutes of this meeting for agreement. Following the teleconference, I sent an email to the Department of Health, dated 28th July 2020 (Exhibit PS/104 (page 479) – INQ000536270).
69. Following the teleconference, I received a letter from the CMO, dated 29th July 2020 (Exhibit PS/105 (pages 480-484) – INQ000536271). Within this letter, the CMO confirmed that the testing programme (previously announced by the Health Minister on 18th May 2020) was to be made available for all care home staff and residents (including care homes which did not, and had not, experienced a Covid-19 outbreak). The CMO also outlined the details of how the testing programme would be applied.
70. On 31st July 2020, I sent an email to the Department of Health, following up on the implementation of the testing policy (Exhibit PS/106 (page 485) – INQ000536272). I considered that we needed an urgent meeting to discuss the policy and roll out plan.
71. On 6th August 2020, I emailed PHA, the RQIA and the DoH with an urgent request to meet to discuss the cumulative effect of issues in care homes and the need to have

a structure in place that has full visibility and understanding of the pressure on care homes (Exhibit PS/107 (page 486-487) – INQ000536273).

72. On 14th August 2020, ihcp attended a meeting with various stakeholders, including the Department of Health and RQIA. During this meeting, a number of issues were raised on behalf of ihcp, including testing programme and processes. Following this meeting, I sent an email to various parties dated 17th August 2020 (Exhibit PS/108 (pages 488-496) – INQ000536274).
73. On 14th September 2020, I emailed PHA, HSCB, RQIA and Mark Lee to outline issues of concern in advance of a planned meeting on 18th September (Exhibit PS/109 (pages 497-502) – INQ000536275). This email included feedback from ihcp members on a range of issues including testing. I received an email response from Marie Roulston at HSCB advising that time would be limited for the meeting on 18th September and it was hoped the meeting would focus on the terms of reference for engagement going forward and that it was hoped that some of the issues raised in my email could be addressed by Rodney Morton at PHA before the meeting on 18th September.
74. On 15th September 2020, I emailed Marie Roulston confirming agreement that the meeting should focus on the communication framework but also stating that pressures are mounting, and it would be good to see progress (Exhibit PS/110 (pages 503-507) – INQ000536276).
75. On 17th September 2020, I emailed Rodney Morton, PHA seeking an update on progress on a list of issues including:
- Testing – delays in results and system issues
 - Guidance on the use of nitrile gloves
 - The need for anaphylactic shock kits to be provided/available.
- (Exhibit PS/111 (page 508) – INQ000536277).
76. On 17th September 2020, PHA care home testing issued an email to all care homes about whole home testing. This email outlined progress in testing and some challenges (Exhibit PS/112 (pages 509-512) – INQ000536278).

77. On 21st September 2020, I emailed the ihcp directors providing an update on the meeting held on 18th September 2020 (Exhibit PS/113 (pages 513-514) – INQ000536279). I did not receive a note of this meeting. This email update included that PHA had confirmed that they were working on a leaflet on testing issues for providers and that anaphylactic shock kits were being considered with a view to providing to all care homes.
78. On 22nd September 2020, I received an email from Heather Reid PHA attaching a copy of the proposed new variables to support care home testing which was being added to the RQIA feedback portal from 1st October 2020. Feedback was sought by midday on 25th September 2020. (Exhibit PS/114 (pages 515-527) – INQ000536280). I also updated ihcp directors on some further communications regarding testing (Exhibit PS/115 (pages 528-529) – INQ000536281).
79. On 23rd September 2020,
- a. I received a letter from the Northern Ireland Assembly Committee for Health asking for the views of ihcp on a range of issues, to inform an inquiry into the impact of Covid-19 on care homes (Exhibit PS/116 (pages 530-534) – INQ000536282). A reply was sought by 19th October 2020. This request included consideration of a range of issues, including: -
 - Discharges from hospital to care homes;
 - Access to PPE;
 - Testing in care homes.
 - b. I received an email from the Department of Health, enclosing an advance copy of the draft care home visiting guidance (entitled '*COVID-19: Regional Principles for Visiting in Care Settings in Northern Ireland*') which was for implementation that day (Exhibit PS/117 (pages 535-572) – INQ000536283).
 - c. I sent an email to the Department of Health that day, copied to the CMO and CNO in which I raised a list of points, including routine testing, the urgent need to address the points in my correspondence and the need to clarify the role of Care Partner (Exhibit PS/118 (pages 573-576) – INQ000536284).

80. On 24th September 2020, I received a letter from the CNO and the CSO referring to new guidance that had been issued the previous day in relation to visiting in hospitals and care homes (Exhibit PS/119 (pages 577-581) – INQ000536285). I sent an email to Mark Lee that day regarding the guidance (Exhibit PS/120 (pages 582-583) – INQ000536286).
81. As a result of the letter from the CNO/CSO dated 24th September 2020, I requested a meeting with the CNO. On 25th September 2020, I emailed the CNO to request a conversation regarding a number of issues causing concern in the sector. The CNO responded, stating that a meeting would be set up as soon as possible and asked that I gave her an idea of what the issues were. I responded to the CNO that day, setting out a list of issues to discuss, including testing delays and impact on being able to implement the visiting policy and testing of homecare staff (Exhibit PS/121 (pages 584-587) – INQ000536287).
82. On 25th September 2020, I sent an email to the CNO and other senior officials, forwarding a copy of an email sent by an ihcp member to the RQIA regarding concerns and pressures in the sector including testing. Within my email, I stated that I have issued many emails and had many meetings but was asking for someone in a senior position to help with these in a joined-up way (Exhibit PS/122 (pages 588-590) – INQ000536288).
83. On 25th September 2020, I sent an email to ihcp directors providing an update about a call I had with PHA and advising that there was an acceptance of issues with testing capacity and targets and that they are drafting a communication on false positive/negative test results (Exhibit PS/123 (page 591) – INQ000536289).
84. On 27th September 2020, I emailed Rodney Morton, PHA regarding testing of domiciliary care staff asking if it was possible to prioritise express testing for this group so that the number of staff awaiting test results could be reduced (Exhibit PS/124 (pages 592) – INQ000536290). I followed this with another email on 4th October 2020, seeking a response (Exhibit PS/125 (pages 593-595) – INQ000536291). On 9th October 2020, I was copied in on an email from Rodney Morton (Exhibit PS/126 (page 596) – INQ000536292). I am unable, however, to locate any response to my emails dated 27th September and 4th October.

85. On 28th September 2020, I emailed ihcp directors to provide an update on meetings I had with RQIA and COPNI in which I had raised concerns about AHP's and Inspectors not being routinely tested as part of the testing programme (Exhibit PS/126 (page 596) – INQ000536292).

86. On 29th September 2020, I met with the CNO and other Departmental Officials via Zoom link to discuss care home provider concerns about the new visiting and 'Care Partner' guidance. This was a heated discussion, during which I expressed a number of concerns, including that,

- The necessary data was not available to enable providers to make the necessary risk assessments;
- Tests were not being returned within the required timescales. I also advised the CNO that testing needed to be sorted as any increased footfall into care homes needed routine testing and that the risks associated with the Care Partner role needed to be assessed.

I was not provided with any minutes of this meeting for agreement. I sent an email to ihcp directors following this meeting (Exhibit PS/127 (pages 597-601) - INQ000536293).

87. By letter dated 30th September 2020, I wrote to the CNO with reference to our meeting on 29th September 2020 (Exhibit PS/128 (pages 602-605) – INQ000536294). Within that letter, I reiterated the issues raised during our meeting, including in relation to delays in test results for staff and residents, the need to test AHP staff, RQIA inspectors and agency staff.

88. On 30th September 2020, PHA Care Home Testing issued an email to all care home managers providing an update of testing targets and advising of changes to the testing regime (Exhibit PS/129 (pages 606-607) – INQ000536295).

89. On 6th October 2020, PHA Care Home Testing issued an email to all care home managers providing further updates on a number of testing issues (Exhibit PS/130 (page 608) – INQ000536296).

90. By letter dated 7th October 2020, I wrote to the Health Minister regarding the sustainability of care home and homecare services through the continuing Covid-19 pandemic (Exhibit PS/131 (pages 609-610) – INQ000536297). Within that letter, I

advised the Health Minister of a number of issues that remained unanswered and unresolved, including testing and the need to expand testing to include homecare staff. I did not receive any response to this letter. I flagged the lack of response to this letter within my further letter dated 16th November 2020.

91. On 16th October 2020, I emailed RQIA and PHA to express concerns about testing, uploading data, tests being lost and problems with notifications of results (Exhibit PS/132 (pages 611-613) – INQ000536298).
92. On 19th October 2020, I sent a letter to Mr Colm Gildernew, Chair of the Northern Ireland Assembly Committee for Health setting out ihcp's response to the request for information for the Inquiry into the impact of Covid-19 in care homes (Exhibit PS/133 (pages 614-618) – INQ000536299). This letter covered the list of areas in the original request, including:-
 - Tests not always being available prior to discharge from hospital to care homes in line with policy; the need for discharge pathways for all Trusts; and the need for a universal approach to retesting discharged patients after 4-7 days to ensure covid-negative;
 - Assurance on the continuity of supply of PPE and consistency of approach;
 - Delays with National testing, local Trust testing capacity, and need for all footfall into care homes to be routinely tested.
93. On 20th October 2020, I emailed ihcp directors to provide an update on a meeting I had with Mark Lee (Exhibit PS/134 (page 619) – INQ000536300). This meeting included a confirmation that PPE supply will continue and the DoH see no time that it will cease. Routes of PPE are strong with the exception of FFP3 masks which they are working to secure.
94. On 20th October 2020, I emailed PHA with a list of issues for a meeting the next day which I could not attend. This list included problems with testing (Exhibit PS/135 (pages 620-623) – INQ000536301).
95. A response was received on 21st October 2010, which generated a number of emails indicating that the responses were not solving any of the questions. I responded to PHA that day (Exhibit PS/136 (pages 624-631) – INQ000536302).

96. On 21st October 2020, I received communication from PHA on answers to testing questions (Exhibit PS/137 (pages 632-639) – INQ000536303). I received a further email from PHA on 23rd October 2020 (Exhibit PS/139 (pages 644-647) – INQ000536305).
97. On 21st October 2020, I received a letter from the CNO in relation to our meeting on 29th September and in response to my letters dated 30th September 2020 (Exhibit PS/138 (pages 640-643) – INQ000536304). This letter included the following:-
- An acknowledgement that there were some delays in testing, but that this was improving;
 - Confirming that from 15th October 2020 RQIA inspectors visiting multiple sites are to be tested for Covid-19 at 14 day intervals;
 - And all AHP's are required to adhere to strict IPC guidance to prevent transmission in care homes.
98. On 3rd November 2020, I received an email from the Department of Health regarding the press release regarding the Covid -19 Testing programme in Care Homes weekly testing of care home staff (Exhibit PS/140 (pages 648-650) – INQ000536306) and advance notice by email of a CMO briefing on 5th November 2020 concerning a press release about care staff testing moving to weekly. I was unable to attend this briefing.
99. On 5th November 2020, I emailed CMO and CNO to apologise for not being able to attend the briefing and provided a list of questions regarding testing including,
- The need for routine testing of anyone regularly attending a care home;
 - Concerns about the capacity to deliver testing in both pillar 1 and pillar 2;
 - Testing for patients discharges from hospital to their own homes;
 - Routine testing of homecare staff;
 - Supported living settings should be treated the same as care homes in terms of testing and outbreaks;
 - Track and trace system unable to distinguish between care staff and members of the public so care staff are being alerted to isolate – other HSC staff turn off phones at work;
 - Need to move forward with rapid testing as this would alleviate staffing pressures in the system.
- (Exhibit PS/141 (page 651) – INQ000536307).

100. On 11th November 2020, I received an email from the Department of Health providing a copy of a draft letter that they proposed to issue to Agency Workers in Care Homes (Exhibit PS/142 (pages 652-655) – INQ000536308). The DoH sought my comments by 13th November 2020.
101. On 12th November 2020, I sent an email to the PHA setting out that I had been advised that the PHA are now taking the lead in developing the Care Partner model and that I was keen to engage on this as a matter of urgency. I received a response from PHA later that day, advising that the Department of Health remained the lead for the work, that communication was going to be sent out to the sector regarding implementation of the policy. The response also included an attachment entitled 'Guidance for care homes on regular testing and what to do in outbreak situations', which provided contact details in relation to testing. (Exhibit PS/143 (page 656) – INQ000536309).
102. On 13th November 2020, I emailed ihcp directors providing the feedback that I intended to issue to the Department of Health regarding the letter to Agency Workers in Care Homes. This list included a number of issues on testing. I sent an email to PHA on 14th November 2020 including this feedback (Exhibit PS/144 (pages 657-660) – INQ000536310).
103. On 16th November 2020, I wrote to the CNO and CSO regarding visiting guidance and the Care Partner role (Exhibit PS/145 (pages 661-662) – INQ000536311). Within that letter, I expressed concerns about the need for any risks to be mitigated (in particular, the risk of increasing footfall in care homes) and suggested that rapid testing be prioritised for the sector. I did not receive any response to this letter.
104. On 16th November 2020, I wrote to the Health Minister in relation to working in partnership, co-production and co-design (Exhibit PS/146 (pages 663-664) – INQ000536312). With this letter, I enclosed a copy of a letter from ihcp to the Chief Nursing Officer / Chief Social Work Officer, dated 16th November 2020 (Re: Visiting Guidance and Care Partner role) in which I suggested that priority should be given to rolling out a programme of rapid testing in the sector as this would assist with both managing the increasing footfall and staffing shortages in care homes. I did not receive any response to my letter to the Health Minister. I flagged the lack of response to this letter within my further letter dated 23rd March 2021. I did not receive any

response to my letter to the Health Minister. I flagged the lack of response to this letter within my further letter dated 23rd March 2021.

105. On 16th November 2020, I wrote to the Department of Health regarding the report on the 'Clinical Analysis of Discharge Patterns from HSC Hospitals in Northern Ireland during early 2020 and any link with Covid-19 Outbreaks in Care Homes' by Dr Herity in which I refer to the need for more frequent testing of residents and urgent priority should be given to the rollout of rapid testing (Exhibit PS/147 (pages 665-666) – INQ000536313).
106. On 18th November 2020, I wrote to the Health Minister regarding rapid testing for care homes and homecare services (Exhibit PS/148 (pages 667-668) – INQ000536314). In this letter, I referred to recent letters outlining ihcp's concerns about the misalignment of Departmental visiting policy with the readiness of care homes to increase footfall and relax visiting. I asked that the Department urgently consider the rapid testing options available and suggested that these could be made available at the entrance to care homes and results returned within 15 minutes. I also asked that homecare (domiciliary care) staff should be tested in line with staff in care homes. I did not receive any response to this letter. I referred to the lack of response to this letter within my letters dated 1st December 2020 and 23rd March 2021, and an email to the Minister's Special Adviser dated 21st January 2021.
107. On 23rd November 2020, I emailed ihcp directors providing an update on a meeting I had with PHA and HSCB (Exhibit PS/149 (page 669) – INQ000536315). The meeting note confirmed that rapid testing was being considered by an oversight group later in the week and that rapid testing is likely to be taken forward but it is not known when or how, however, this would not be proceeded with unless agreed by the oversight group at a higher level.
108. On 25th November 2020, I emailed the Department of Health, in which I forwarded a copy of my email to the CNO on 4th October regarding Visitor Pods. I also ask if rapid testing could be moved forward (Exhibit PS/150 (pages 670-672) – INQ000536316).
109. On 26th November 2020, I received an email response from Mark Lee at the Department of Health, in which it was stated that there were some challenges with rapid testing, including accuracy of results. I was advised that until I saw a line from

the CMO or CSO or someone confirming an approach to use lateral flow tests in care homes, there should be no assumptions about what they may or may not be able to do in that context. Holding off on facilitating visits until lateral flow tests arrive was said not to be an advisable strategy (Exhibit PS/151 (page 673) – INQ000536317). I respond to this email that day, providing a wide range of data on the reliability of rapid testing and stating that I considered these could ease problems with staffing and visiting (Exhibit PS/152 (pages 674-675) – INQ000536318).

110. On 27th November 2020, I emailed ihcp directors to update on a short notice call I had regarding point of contact testing for visitors. At that meeting, it was confirmed that lateral flow testing for care home visitors had been trialled in other parts of the UK and NI had been provided tests kits in order to participate in a feasibility trial over the following week and seeking ihcp input to secure 15 homes to trial the tests. I sought volunteers from ihcp directors (Exhibit PS/153 (page 676) – INQ000536319).
111. On 1st December 2020, I wrote to the Health Minister again raising concerns about the role of Care Partner and again requested that rapid testing should be put in place to reduce risk (Exhibit PS/154 (pages 677-678) – INQ000536320). I did not receive any response to this letter. I flagged the lack of response to this letter within my email to the Minister's Special Adviser, dated 21st January 2021 and letter to the Health Minister, dated 23rd March 2021. I issued an email to ihcp members that day attaching a copy of the Minister's letter and advising that ihcp had provided a list of 15 Care Homes to participate in the trial for lateral flow testing. (Exhibit PS/155 (pages 679-680) – INQ000536321).
112. On 2nd December 2020, I sent an email to Mark Lee, responding to his email regarding Christmas visiting guidance that had been issued, and the alignment with the lateral flow testing pilot (Exhibit PS/156 (pages 681-682) – INQ000536322).
113. On 4th December 2020, I sent an email to PHA with a list of issues and seeking a meeting the following week. The issues included testing of homecare staff in England and lateral flow testing (Exhibit PS/157 (pages 683-684) – INQ000536323).
114. By letter dated 15th December 2020, I wrote to the Health Minister expressing the extreme disappointment of ihcp about the Minister's statement on 11th December, when in fact we had been trying to engage with the Health Minister over a number of weeks (Exhibit PS/158 (pages 685-686) – INQ000536324). I outlined ihcp's

responses to a series of comments that had been made by the Department and the Minister within the 11th December statement. I, again, requested an urgent meeting with the Minister to discuss this issue and the need for rapid testing. I did not receive any response to this letter. I flagged the lack of response to this letter within my letters dated 7th January 2021 and 23rd March 2021, and in an email to the Minister's Special Adviser dated 21st January 2021.

115. On 15th December 2020, I also wrote to the CMO in relation to rapid testing (Exhibit PS/159 (pages 687-688) – INQ000536325). I advised that I had been communicating with Health and Social Care for some weeks seeking clarity about rapid testing, and that I had received no reply to the issues raised. As such, I sought the CMO's help. I stated that care homes were concerned about allowing untested visitors into care homes, and had been working with the Department on a trial of lateral flow testing in 15 care homes. However, the pressure from Health and Social Care and families to relax visiting, against a backdrop of increasing community transmission, was a concern and that we were seeking to reduce risks using rapid testing. I provided links to relevant research concerning rapid testing and sought help from CMO. I did not receive any response to this letter. I flagged the lack of response to this letter within my further letter dated 7th January 2021.
116. On 16th December 2020, a letter was issued from the CMO/CNO regarding visiting and care partner arrangements and access to testing over the Christmas period. That letter enclosed a document entitled '*Access to COVID-19 testing for visitors to further support visiting arrangements within care homes over the Christmas period*' (Exhibit PS/160 (pages 689-695) – INQ000536326).
117. On 17th December 2020, I sent an email to PHA and HSCB as a follow on from a meeting earlier that day (Exhibit PS/161 (page 696) – INQ000536327). I provided a list of issues regarding problems with the national testing programme and also seeking clarity on the anomaly between staff and residents quarantine periods.
118. On 18th December 2020, a letter was issued by the CMO regarding Covid-19 testing arrangements for residential and nursing homes (Exhibit PS/162 (pages 697-712) – INQ000536328). Enclosed with that letter were the following documents:-

- Annex A - '*Covid-19 Testing Guidance for Care Homes*';

- Annex B—‘*Visiting and Care Partner Arrangements in Care Homes over the Christmas Period*’;
 - Document entitled ‘*Covid-19 testing centres available over the Christmas period – available until Friday 8 January 2021*’.
119. On 18th December 2020, I received a letter from Mark Lee in response to my letter of 16th November regarding the report on the ‘Clinical Analysis of Discharge Patterns from HSC Hospitals in Northern Ireland During Early 2020 and Any Link With COVID-19 Outbreaks in Care Homes’ (Exhibit PS/163 (pages 713-716) – INQ000536329). Mark Lee stated that separate discussions are ongoing related to testing and visiting and he will not rehearse those discussions in the letter.
120. On 22nd December 2020, I sent a further letter to Mark Lee regarding the report on the ‘Clinical Analysis of Discharge Patterns from HSC Hospitals in Northern Ireland during early 2020 and any Link with COVID-19 Outbreaks in Care Homes’ by Dr Herity and referencing the concern about increasing footfall into care homes and the need for rapid testing of all people visiting a care home in any capacity (Exhibit PS/164 (pages 717-718) – INQ000536330).
121. On 7th January 2021, I wrote to the Health Minister requesting engagement. Within that letter, I outlined in detail the list of outstanding matters that I had been raising in communication over several months and sought the Department’s response and engagement on the issues (Exhibit PS/165 (pages 719-723) – INQ000536331). These included rapid/lateral flow testing and the care home pilot which had been postponed at short notice and ihcp proposal regarding Urcare rapid testing. I, again, requested the opportunity to meet with/further discuss the above issues with the Department. I did not receive any response to this letter. I flagged the lack of response to this letter within my email to the Minister’s Special Adviser dated 21st January 2021 and further letter to the Minister dated 23rd March 2021.
122. On 11th January 2021, I received an email from PHA regarding New testing intervention using lateral flow device (Exhibit PS/166 (pages 724-728) – INQ000536332). This email advised that it remained hopeful that testing of visitors will go ahead as planned this week but new guidance on visiting in care homes has not yet been released so a final draft would not issue until tomorrow afternoon. This was followed by further email on 12th January 2021 regarding instructions for lateral flow testing (Exhibit PS/167 (pages 729-730) – INQ000536333).

123. On 21st January 2021, I sent an email to the Health Minister's Special Adviser, Mr Mark Ovens, regarding correspondence that had not been responded to (Exhibit PS/168 (page 731-732) - INQ000536334). I attached to that email copies of my letters to the Health Minister dated 16th November 2020, 18th November 2020, 1st December 2020, 15th December 2020 and 7th January 2021. I requested Mr Ovens help as the Health Minister's Special Adviser. I stated that I had exhausted all avenues to try to engage on the issues in the letters, and sought an urgent response. I recollect having a phone call with Mr Ovens. I unfortunately did not, however, make a note of that call or any further follow up communication. I do not recollect the content of the discussion. Furthermore, I was not provided with any minutes of this meeting for agreement.
124. On 21st January 2021, the Northern Ireland Assembly Committee for Health issued its Inquiry Report on the Impact of Covid-19 in Care Homes (Exhibit PS/169 (pages 733-752) – INQ000536335).
125. On 22nd February 2021, I sent an email to Mark Lee and PHA regarding a media announcement on England about opening up visiting in care homes and seeking an update on roll-out plans for lateral flow testing in the event that NI followed this route. I asked for an urgent meeting to discuss. I received a response stating that there is extensive material online about the current approach and seeking clarity on the purpose of any meeting. I responded confirming that I was seeking clarity on any planned pathway to move in the same direction as England and referring to the lateral flow project (Exhibit PS/170 (pages 753-754) – INQ000536336).
126. On 1st March 2021, I emailed PHA and Mark Lee regarding the roll out of lateral flow testing (Exhibit PS/171 (pages 755-758) – INQ000536337). I referred to relaxation of visiting in care homes, the lateral flow pilot and learning from it along with logistical implementation plan and any plan for rapid test devices.
127. On 25th March 2020, I received an email from PHA regarding a draft proposal on the roll out of lateral flow device testing. On 27th March 2020 I emailed PHA asking that the lateral flow testing continues to align with the 'normalising visiting' pathway. I received confirmation on 30th March from PHA that this was the case (Exhibit PS/172 (pages 759-764) – INQ000536338).

128. On 15th April 2021, I was copied into a letter issued by the CNO and CSO regarding visiting and care partner arrangements in care homes. This guidance stated that additional testing for care partners remains (Exhibit PS/173 (pages 765-768) – INQ000536339).
129. On 20th April 2021, I emailed ihcp directors to provide an update on a meeting I had with RQIA and PHA (Exhibit PS/174 (page 769) – INQ000536340). This note confirmed that there had been no policy decision on testing for homecare staff and mentioned a number of other issues on testing performance.
130. On 22nd April 2021, I emailed PHA to provide feedback from ihcp members on the draft pathway for phased relaxation of visiting restrictions which includes reference to testing (Exhibit PS/175 (pages 770-771) – INQ000536341).
131. On 5th May 2021, Mark Lee issued and copied to me a letter advising that updated guidance for care homes on visiting – 'Visiting with Care – a pathway' was taking effect from 7th May 2021 (Exhibit PS/176 (pages 772-773) – INQ000536342).
132. I have been asked whether ihcp have any response to the paragraph of the Rule 9 request titled 'Lessons Learned', including any internal or external reviews, lessons learned exercises or similar produced or commissioned by ihcp or that ihcp has been involved with relating to any of the issues in the scope for Module 5 since January 2020. I confirm that ihcp has not collected any information in this regard.

Statement of Truth

The facts stated in this witness statement are true to the best of my knowledge and belief.

Signed:

Personal Data

Dated:

21/2/25

Witness Name: Pauline Shepherd

Statement No.: 1 (Module 5)

Exhibits: PS/1 – 176

Dated: 21.02.25

UK COVID-19 INQUIRY

WITNESS STATEMENT OF PAULINE SHEPHERD

EXHIBIT SCHEDULE

| Exhibit | Paragraph Number | Internal Reference | Inquiry Reference |
|---------|------------------|-----------------------------|-------------------|
| PS/1 | 12 | Exhibit PS/1 (pages 1-3) | INQ000536167 |
| PS/2 | 13 | Exhibit PS/2 (pages 4-5) | INQ000536168 |
| PS/3 | 14 | Exhibit PS/3 (pages 6-17) | INQ000536169 |
| PS/4 | 15 | Exhibit PS/4 (pages 18-19) | INQ000536170 |
| PS/5 | 15 | Exhibit PS/5 (page 20) | INQ000536171 |
| PS/6 | 15 | Exhibit PS/6 (page 21) | INQ000536172 |
| PS/7 | 15 | Exhibit PS/7 (page 22) | INQ000536173 |
| PS/8 | 15 | Exhibit PS/8 (page 23) | INQ000536174 |
| PS/9 | 15 | Exhibit PS/9 (page 24) | INQ000536175 |
| PS/10 | 15 | Exhibit PS/10 (page 25) | INQ000536176 |
| PS/11 | 16 | Exhibit PS/11 (page 26) | INQ000536177 |
| PS/12 | 16 & 17 | Exhibit PS/12 (pages 27-48) | INQ000536178 |
| PS/13 | 18 | Exhibit PS/13 (pages 49-51) | INQ000536179 |
| PS/14 | 18 | Exhibit PS/14 (pages 52-54) | INQ000536180 |
| PS/15 | 18 | Exhibit PS/15 (pages 55-56) | INQ000536181 |
| PS/16 | 18 | Exhibit PS/16 (page 57) | INQ000536182 |
| PS/17 | 19 | Exhibit PS/17 (page 58-59) | INQ000536183 |
| PS/18 | 20 | Exhibit PS/18 (pages 60-72) | INQ000536184 |
| PS/19 | 21 | Exhibit PS/19 (pages 73-74) | INQ000536185 |
| PS/20 | 22 | Exhibit PS/20 (pages 75-77) | INQ000536186 |
| PS/21 | 13 | Exhibit PS/21 (page 78) | INQ000536187 |
| PS/22 | 23 | Exhibit PS/22 (page 79) | INQ000536188 |
| PS/23 | 23 | Exhibit PS/23 (page 80) | INQ000536189 |
| PS/24 | 23 | Exhibit PS/24 (pages 81-83) | INQ000536190 |
| PS/25 | 24 | Exhibit PS/25 (pages 84-85) | INQ000536191 |
| PS/26 | 24 | Exhibit PS/26 (pages 86-87) | INQ000536192 |
| PS/27 | 24 | Exhibit PS/27 (pages 88-89) | INQ000536193 |
| PS/28 | 24 | Exhibit PS/28 (page 90-91) | INQ000536194 |
| PS/29 | 24 | Exhibit PS/29 (pages 92-93) | INQ000536195 |

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|-------|---------|-------------------------------|--------------|
| PS/30 | 24 | Exhibit PS/30 (pages 94-97) | INQ000536196 |
| PS/31 | 24 | Exhibit PS/31 (page 98-100) | INQ000536197 |
| PS/32 | 25 | Exhibit PS/32 (pages 101-102) | INQ000536198 |
| PS/33 | 26 | Exhibit PS/33 (pages 103-104) | INQ000536199 |
| PS/34 | 27 | Exhibit PS/34 (pages 105-106) | INQ000536200 |
| PS/35 | 27 | Exhibit PS/35 (pages 107-108) | INQ000536201 |
| PS/36 | 28 | Exhibit PS/36 (pages 109-113) | INQ000536202 |
| PS/37 | 29 | Exhibit PS/37 (pages 114-117) | INQ000536203 |
| PS/38 | 29 | Exhibit PS/38 (pages 118-120) | INQ000536204 |
| PS/39 | 30 | Exhibit PS/39 (page 121-126) | INQ000536205 |
| PS/40 | 31 | Exhibit PS/40 (page 127) | INQ000536206 |
| PS/41 | 32 | Exhibit PS/41 (pages 128-129) | INQ000536207 |
| PS/42 | 31 | Exhibit PS/42 (page 130-131) | INQ000536208 |
| PS/43 | 33 | Exhibit PS/43 (pages 132-184) | INQ000536209 |
| PS/44 | 34 | Exhibit PS/44 (pages 185-186) | INQ000536210 |
| PS/45 | 34 | Exhibit PS/45 (pages 187-188) | INQ000536211 |
| PS/46 | 36 | Exhibit PS/46 (pages 189-206) | INQ000536212 |
| PS/47 | 36 | Exhibit PS/47 (pages 207-208) | INQ000536213 |
| PS/48 | 36 | Exhibit PS/48 (pages 209-210) | INQ000536214 |
| PS/49 | 36 | Exhibit PS/49 (pages 211-212) | INQ000536215 |
| PS/50 | 36 | Exhibit PS/50 (pages 213-214) | INQ000536216 |
| PS/51 | 35 & 36 | Exhibit PS/51 (pages 215-217) | INQ000536217 |
| PS/52 | 36 | Exhibit PS/52 (pages 218-226) | INQ000536218 |
| PS/53 | 37 | Exhibit PS/53 (page 227) | INQ000536219 |
| PS/54 | 38 | Exhibit PS/54 (pages 228-229) | INQ000536220 |
| PS/55 | 39 | Exhibit PS/55 (pages 230-231) | INQ000536221 |
| PS/56 | 39 | Exhibit PS/56 (pages 232-234) | INQ000536222 |
| PS/57 | 39 | Exhibit PS/57 (pages 235-236) | INQ000536223 |
| PS/58 | 39 | Exhibit PS/58 (page 237) | INQ000536224 |
| PS/59 | 39 | Exhibit PS/59 (pages 238-240) | INQ000536225 |
| PS/60 | 39 | Exhibit PS/60 (page 241) | INQ000536226 |
| PS/61 | 40 | Exhibit PS/61 (page 242) | INQ000536227 |
| PS/62 | 40 | Exhibit PS/62 (page 243) | INQ000536228 |
| PS/63 | 40 | Exhibit PS/63 (pages 244-245) | INQ000536229 |
| PS/64 | 40 | Exhibit PS/64 (pages 246-247) | INQ000536230 |
| PS/65 | 40 | Exhibit PS/65 (pages 248-253) | INQ000536231 |
| PS/66 | 40 | Exhibit PS/66 (pages 254-259) | INQ000536232 |
| PS/67 | 40 | Exhibit PS/67 (pages 260-262) | INQ000536233 |
| PS/68 | 40 | Exhibit PS/68 (pages 263-264) | INQ000536234 |
| PS/69 | 40 | Exhibit PS/69 (pages 265-266) | INQ000536235 |
| PS/70 | 41 | Exhibit PS/70 (pages 267-272) | INQ000536236 |
| PS/71 | 42 | Exhibit PS/71 (pages 273-280) | INQ000536237 |
| PS/72 | 42 | Exhibit PS/72 (page 281) | INQ000536238 |
| PS/73 | 42 | Exhibit PS/73 (pages 282-287) | INQ000536239 |
| PS/74 | 42 | Exhibit PS/74 (pages 288-289) | INQ000536240 |
| PS/75 | 42 | Exhibit PS/75 (pages 290-293) | INQ000536241 |
| PS/76 | 44 | Exhibit PS/76 (page 294) | INQ000536242 |
| PS/77 | 45 | Exhibit PS/77 (page 295) | INQ000536243 |
| PS/78 | 47 | Exhibit PS/78 (pages 296-337) | INQ000536244 |
| PS/79 | 46 | Exhibit PS/79 (pages 338-340) | INQ000536245 |
| PS/80 | 48 | Exhibit PS/80 (page 341) | INQ000536246 |
| PS/81 | 49 | Exhibit PS/81 (pages 342-343) | INQ000536247 |

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|--------|---------|---------------------------------|--------------|
| PS/82 | 50 | Exhibit PS/82 (pages 344-345) | INQ000536248 |
| PS/83 | 50 | Exhibit PS/83 (pages 346-347) | INQ000536249 |
| PS/84 | 50 | Exhibit PS/84 (pages 348-349) | INQ000536250 |
| PS/85 | 51 | Exhibit PS/85 (page 350) | INQ000536251 |
| PS/86 | 51 | Exhibit PS/86 (pages 351-354) | INQ000536252 |
| PS/87 | 52 | Exhibit PS/87 (pages 355-356) | INQ000536253 |
| PS/88 | 51 | Exhibit PS/88 (pages 357-400) | INQ000536254 |
| PS/89 | 53 | Exhibit PS/89 (pages 401-406) | INQ000536255 |
| PS/90 | 54 | Exhibit PS/90 (pages 407-408) | INQ000536256 |
| PS/91 | 55 | Exhibit PS/91 (pages 409-417) | INQ000536257 |
| PS/92 | 56 | Exhibit PS/92 (pages 418-421) | INQ000536258 |
| PS/93 | 57 | Exhibit PS/93 (page 422-428) | INQ000536259 |
| PS/94 | 58 | Exhibit PS/94 (page 429) | INQ000536260 |
| PS/95 | 59 | Exhibit PS/95 (pages 430-431) | INQ000536261 |
| PS/96 | 58 | Exhibit PS/96 (page 432-445) | INQ000536262 |
| PS/97 | 60 | Exhibit PS/97 (page 446-450) | INQ000536263 |
| PS/98 | 61 | Exhibit PS/98 (page 451) | INQ000536264 |
| PS/99 | 62 | Exhibit PS/99 (pages 452-462) | INQ000536265 |
| PS/100 | 64 | Exhibit PS/100 (pages 463-472) | INQ000536266 |
| PS/101 | 65 | Exhibit PS/101 (pages 473-474) | INQ000536267 |
| PS/102 | 66 | Exhibit PS/102 (pages 475-476) | INQ000536268 |
| PS/103 | 67 | Exhibit PS/103 (pages 477-478) | INQ000536269 |
| PS/104 | 68 | Exhibit PS/104 (page 479) | INQ000536270 |
| PS/105 | 69 | Exhibit PS/105 (page 480-484) | INQ000536271 |
| PS/106 | 70 | Exhibit PS/106 (page 485) | INQ000536272 |
| PS/107 | 71 | Exhibit PS/107 (pages 486-487) | INQ000536273 |
| PS/108 | 72 | Exhibit PS/108 (pages 488-496) | INQ000536274 |
| PS/109 | 73 | Exhibit PS/109 (pages 497-502) | INQ000536275 |
| PS/110 | 74 | Exhibit PS/110 (pages 503-507) | INQ000536276 |
| PS/111 | 75 | Exhibit PS/111 (page 508) | INQ000536277 |
| PS/112 | 76 | Exhibit PS/112 (pages 509-512) | INQ000536278 |
| PS/113 | 77 | Exhibit PS/113 (pages 513-514) | INQ000536279 |
| PS/114 | 78 | Exhibit PS/114 (pages 515-527) | INQ000536280 |
| PS/115 | 78 | Exhibit PS/115 (pages 528-529) | INQ000536281 |
| PS/116 | 79 | Exhibit PS/116 (pages 530-534) | INQ000536282 |
| PS/117 | 79 | Exhibit PS/117 (pages 535-572) | INQ000536283 |
| PS/118 | 79 | Exhibit PS/118 (pages 5573-576) | INQ000536284 |
| PS/119 | 80 | Exhibit PS/119 (pages 577-581) | INQ000536285 |
| PS/120 | 80 | Exhibit PS/120 (pages 582-583) | INQ000536286 |
| PS/121 | 81 | Exhibit PS/121 (pages 584-587) | INQ000536287 |
| PS/122 | 82 | Exhibit PS/122 (pages 588-590) | INQ000536288 |
| PS/123 | 83 | Exhibit PS/123 (page 591) | INQ000536289 |
| PS/124 | 84 | Exhibit PS/124 (page 592) | INQ000536290 |
| PS/125 | 84 | Exhibit PS/125 (pages 593-595) | INQ000536291 |
| PS/126 | 84 & 85 | Exhibit PS/126 (page 596) | INQ000536292 |
| PS/127 | 86 | Exhibit PS/127 (pages 597-601) | INQ000536293 |
| PS/128 | 87 | Exhibit PS/128 (pages 602-605) | INQ000536294 |
| PS/129 | 88 | Exhibit PS/129 (pages 606-607) | INQ000536295 |
| PS/130 | 89 | Exhibit PS/130 (page 608) | INQ000536296 |
| PS/131 | 90 | Exhibit PS/131 (pages 609-610) | INQ000536297 |
| PS/132 | 91 | Exhibit PS/132 (pages 611-613) | INQ000536298 |
| PS/133 | 92 | Exhibit PS/133 (pages 614-618) | INQ000536299 |
| PS/134 | 93 | Exhibit PS/134 (page 619) | INQ000536300 |

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|--------|-----|--------------------------------|--------------|
| PS/135 | 94 | Exhibit PS/135 (pages 620-623) | INQ000536301 |
| PS/136 | 95 | Exhibit PS/136 (pages 624-631) | INQ000536302 |
| PS/137 | 96 | Exhibit PS/137 (pages 632-639) | INQ000536303 |
| PS/138 | 97 | Exhibit PS/138 (pages 640-643) | INQ000536304 |
| PS/139 | 96 | Exhibit PS/139 (pages 644-647) | INQ000536305 |
| PS/140 | 96 | Exhibit PS/140 (pages 648-650) | INQ000536306 |
| PS/141 | 99 | Exhibit PS/141 (page 651) | INQ000536307 |
| PS/142 | 100 | Exhibit PS/142 (pages 652-655) | INQ000536308 |
| PS/143 | 101 | Exhibit PS/143 (page 656) | INQ000536309 |
| PS/144 | 102 | Exhibit PS/144 (pages 657-660) | INQ000536310 |
| PS/145 | 103 | Exhibit PS/145 (pages 661-662) | INQ000536311 |
| PS/146 | 104 | Exhibit PS/146 (pages 663-664) | INQ000536312 |
| PS/147 | 105 | Exhibit PS/147 (page 665-666) | INQ000536313 |
| PS/148 | 106 | Exhibit PS/148 (pages 667-668) | INQ000536314 |
| PS/149 | 107 | Exhibit PS/149 (page 669) | INQ000536315 |
| PS/150 | 108 | Exhibit PS/150 (pages 670-672) | INQ000536316 |
| PS/151 | 109 | Exhibit PS/151 (page 673) | INQ000536317 |
| PS/152 | 109 | Exhibit PS/152 (pages 674-675) | INQ000536318 |
| PS/153 | 110 | Exhibit PS/153 (page 676) | INQ000536319 |
| PS/154 | 111 | Exhibit PS/154 (pages 677-678) | INQ000536320 |
| PS/155 | 111 | Exhibit PS/155 (pages 679-680) | INQ000536321 |
| PS/156 | 112 | Exhibit PS/156 (pages 681-682) | INQ000536322 |
| PS/157 | 113 | Exhibit PS/157 (pages 683-684) | INQ000536323 |
| PS/158 | 114 | Exhibit PS/158 (pages 685-686) | INQ000536324 |
| PS/159 | 115 | Exhibit PS/159 (pages 687-688) | INQ000536325 |
| PS/160 | 116 | Exhibit PS/160 (pages 689-695) | INQ000536326 |
| PS/161 | 117 | Exhibit PS/161 (page 696) | INQ000536327 |
| PS/162 | 118 | Exhibit PS/162 (pages 697-712) | INQ000536328 |
| PS/163 | 119 | Exhibit PS/163 (pages 713-716) | INQ000536329 |
| PS/164 | 120 | Exhibit PS/164 (pages 717-718) | INQ000536330 |
| PS/165 | 121 | Exhibit PS/165 (pages 719-723) | INQ000536331 |
| PS/166 | 122 | Exhibit PS/166 (page 724-728) | INQ000536332 |
| PS/167 | 122 | Exhibit PS/167 (pages 729-730) | INQ000536333 |
| PS/168 | 123 | Exhibit PS/168 (pages 731-732) | INQ000536334 |
| PS/169 | 124 | Exhibit PS/169 (pages 733-752) | INQ000536335 |
| PS/170 | 125 | Exhibit PS/170 (pages 753-754) | INQ000536336 |
| PS/171 | 126 | Exhibit PS/171 (pages 755-758) | INQ000536337 |
| PS/172 | 127 | Exhibit PS/172 (pages 759-764) | INQ000536338 |
| PS/173 | 128 | Exhibit PS/173 (pages 765-768) | INQ000536339 |
| PS/174 | 129 | Exhibit PS/174 (page 769) | INQ000536340 |
| PS/175 | 130 | Exhibit PS/175 (pages 770-771) | INQ000536341 |
| PS/176 | 131 | Exhibit PS/176 (pages 772-773) | INQ000536342 |