Witness Name: Lorraine Davidson
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UK COVID-19 INQUIRY

WITNESS STATEMENT OF LORRAINE DAVIDSON

I, Lorraine Davidson, am the current Chief Executive of the Scottish Council of Independent Schools (SCIS). I took up post in July 2023 therefore the aspects of the witness statement I have drafted relate to lessons learned. My predecessor John Edward led the organisation at the time of the pandemic and the aspects of the statement which relate to the time of the pandemic have been drafted by John Edward.

The Scottish Council of Independent Schools and its member schools

1. The Scottish Council of Independent Schols engages on behalf of its members with the Scottish Government, and UK Government when appropriate.
2. SCIS has a formal place on many of the key education forums within Scottish education including the Scottish Government Curriculum and Assessment Board. It meets regularly with government officials and officials from the main Education bodies in Scotland, which include Education Scotland and the Scottish Qualifications Authority (SQA)
3. The organisation also engages with universities and experts to further its aims of promoting excellence in Scottish education. During the pandemic it obtained its information and guidance from the Scottish Government and education bodies. It did not commission separate advice.
4. SCIS represents 70 schools in Scotland which educate almost 30,000 children and young people

5. SCIS schools are located in every geographical area of Scotland, with the exception of the Highlands and Islands area. We have member schools in the South of Scotland, Glasgow and Strathclyde, Edinburgh and the Lothians, Tayside, Central and Fife and Aberdeen and the North East.
6. The majority of the schools in the independent sector are based on a pupil fee-paying model where places are funded by families. However, 20 of the SCIS schools are specialist schools for children and young people with complex needs, whose places are funded by local government.
7. The fee-paying schools include Junior Schools, Prep Schools, all through day schools, which educate children between the ages of 2-18, and boarding schools which educate children who travel from 80 different countries to live and be educated in Scotland. There are several faith schools represented by SCIS including a Muslim school and two Roman Catholic schools.
8. The most recent census information gathered by SCIS in September 2024 showed that there are 28,870 pupils being educated in our member schools. We do not hold figures for the number of pupils who have English as an additional language.
9. The number of pupils attending our schools who have complex additional needs is around 300. However, the number of pupils attending our mainstream schools who have an additional support need (ASN) is in line with the Scottish national average of 30 per cent.
10. Our member schools provide financial assistance in the form of bursaries and scholarships to pupils, making it easier for pupils of varied backgrounds to attend an independent school and widening access to the sector.
11. The level of financial assistance provided to individual pupils varies greatly and can (in some cases) represent anything up to 100% of the total fee. Support can take several forms including bursaries,

scholarships and discounts and may be means tested or non-means tested.

12. In 2022/23, our member schools provided £56 million in financial assistance, of which almost 60% was in means-tested assistance. This benefitted 6,430 pupils, which suggests that the assistance provided per assisted pupil is equal to £8,650. This represents 22% of the pupils educated by SCIS member schools and 11% of the total income received.
13. We do not hold figures for the number of pupils in receipt of free school meals. For some bursary recipients meals will be included but this information is not held by SCIS.

Learning and education prior to the pandemic

14. Prior to the pandemic there were few challenges faced by our schools in the delivery of education.
15. The majority of SCIS member schools offer SQA qualifications. However, some schools deliver A levels, GCSEs, the International Baccalaureate and BTEC qualifications, and are therefore engaged with a wide variety of exam boards.
16. Attainment levels for national qualifications in our mainstream schools far exceeded the national average.
17. Attendance levels were extremely high with no member school reporting any issues with non-attendance.
18. Behavioral trends and challenges centered on those which were common in society, for example the use of mobile phones. Many schools were addressing these through policies restricting mobile phone use. Engagement with learning for those with ASN was supported by learning support departments.
19. Our schools offer quality provision for children with complex additional needs. Regular inspections show the high level of this support. An increasing number of pupils at specialist schools are supported to undertake national qualifications at SQA levels 1 and 2.

20. Learning online or remotely was not a feature of our schools prior to the pandemic. Such learning was restricted to pupils who were out of school for exceptional reasons ie long term illness.

Planning for the pandemic

21. There had been no structured internal discussion or planning about management of a pandemic or more localised outbreak prior to 2020. Likewise, there was no indication from government or other bodies that specific planning ought to be in place.
22. When public health issues were raised, as with other viral outbreaks or changes to the vaccination programmes for children and young people (such as HPV or seasonal 'flu), these were communicated through school staff, often including the lead medical contact (most larger schools and boarding facilities retained permanent nursing or medical support).
23. For those schools with a residential capacity, or with primarily primary school-age children, infection control is always an issue of priority.
24. SCIS was a member of an NHS Lothian vaccination group for education, which ensured regular meetings and updates, and also fielded any questions raised by schools. In most cases, this information was valid to be disseminated in schools across Scotland.
25. Schools were encouraged by SCIS, insurers and other advisory bodies to update critical incident planning. This was, in part, informed by greater awareness of counter-terrorism requirements, as well as the sustained awareness in Scottish schools of the aftermath of the Dunblane Primary School shooting. Critical incident plans were more often directed towards major accidents or unexpected criminal acts, but aspects of these plans also applied to training and modifications that might be required in the event of serious medical emergencies.

During the pandemic

26. SCIS engagement with the Scottish Government (SG) particularly during lockdowns, took place several times a day and at times on a seven day per week basis.

27. Almost all primary questions about policy or practice, requests for clarification, or independent sector-specific recommendations were to/from the Head of School (job-share) Funding, Infrastructure & Organisation Unit ("SFIO") in the Learning Directorate of the Scottish Government (HeadSFIO@gov.scot) as well as with the Registrar of Independent Schools ("RIS") – a Scottish Government appointed post which, at the time, sat within Education Scotland.

28. The initial correspondence, prior to the first closure of schools, was on infection control advice from Public Health Scotland, data collection for oversea trips (when still envisaged), and advice from Public Health Scotland on suspected cases. By early March I had started update e-mails on Covid-19 to all member schools (and a couple of other independent institutions that I thought might not receive much support). These messages were sent at least weekly, but also whenever a major decision was made or sought, or guidance changed or was updated. They continued until the end of the academic year in summer 2021.

29. By mid-February, we had already communicated with NHS Scotland and the Scottish Government on pupils travelling overseas in the February half-term. Schools had already started to tell pupils not to travel back to places such as Italy and Hong Kong and to stay with guardians. Consideration was already being given to the best options for returning pupils, whether symptomatic or not, and issues of self-isolation in boarding settings.

30. In early March 2020, as the likely passage of disease control became more clear, SCIS sought clarification on the legal status of advice to independent schools, which do not fall under the control of local authorities. There was no question about schools' willingness to comply with infection control measures; they were keen to ensure that

they were acting legally within their own governance in terms of any decisions to restrict access to schools, or close buildings completely. These were supplemented by repeated Educational Continuity Directions which were communicated by SG and RIS.

31. At this stage, we were in contact with schools to reassure them that discussions underway within Government and regulators would include the independent sector. On 12 March SCIS issued a short press statement to that effect, conscious that different schools were already starting to take different decisions on the cancellation and possible reimbursement of overseas school trips.

32. On 9 March, I contacted the Finance Secretary on COVID-19 relief following that day's UK Budget announcement of the waiving of large amounts on business rates for the coming year. This was the first of several formal communications with the Finance Secretary and the Deputy First Minister pointing out that the only bodies facing cost rises, rather than relief, in the face of COVID-19 and the other preceding challenges, were the 50 mainstream Scottish independent schools; 50+ schools once the Non-Domestic Rate Bill was passed.

33. On 13 March, schools were notified that all school inspections would be paused. On the same day, schools started to ask SCIS about any financial support that might be forthcoming from Government should schools need to close. In that same week, SCIS was asked by schools about the status of sick pay and dependency leave. Representations were made by SCIS directly to Ministers, and through officials, concerning any financial support that became available for organisations affected by COVID-19 (including Business Rates). This included the issue of funded nursery places, as well as any impact on schools which, at that time, had not been asked to close.

34. On 13 March, the Scottish Government, via RIS, wrote to all schools a letter marked "Sensitive" on potential impacts for schools and early

learning centres – including possible closure and examination preparedness.

35. On 17 March, SCIS was included in the SQA Contingency Group which met for the first time. The questions SCIS sent preceding that meeting were:

    I. Alternative exam accommodation: will protocols be relaxed to allow exams to take place in other buildings if schools are closed?

    II. Alternative invigilators: invigilators do tend to be older and retired persons who may be vulnerable, ill, quarantined or just unwilling to participate. Will rules be relaxed to allow senior school staff to invigilate exams if needed?

    III. Exceptional Circumstances: this system handles 0.8% of entries each year. How will it scale up to even a 5% absence rate? If schools are closed early, it's unlikely schools will have the opportunity to develop additional evidence beyond December/January prelims - particularly given the removal of unit assessments.

    IV. Late certification: is it a realistic possibility that schools will come back in August with this year's S4s and continuing S5s not having been certificated by that point?

    V. Rescheduled exams: is it a realistic possibility that an alternative exam calendar will be produced, having impacts on school life in June (particularly school trips – if indeed they can happen anyway)?

    VI. Estimated grades: is it realistic that, if Exceptional Circumstances is overwhelmed, schools may be asked to submit exam grades for pupils based on classwork and professional judgement? If so, would there be any attempt at verification of those judgements?

    VII. Could EX6s for Higher and Advanced Higher coursework be sent out early? Schools have brought deadlines forward to ensure

that they have all the necessary coursework ready to be sent off to SQA, but without the EX6s they cannot package anything up. Were schools to close it would mean a huge administrative headache regarding this evidence.

36. On the same day, I met with RIS to raise issues including those for boarding pupils, not least those from countries in lockdown. In addition, schools asked SCIS to raise with SFIO issues of pupils already not attending and members of staff self-isolating, without any formal guidance to do so. SCIS also began to share with SFIO and RIS guidance received by other schools' associations in the UK and further afield. The RIS asked for SCIS support in ensuring all schools completed weekly school absence updates.

37. On 18 March, I passed on to schools the First Minister's announcement that schools would likely close at the end of that week. SCIS communicated to SFIO that if school closure was to take place, consideration would need to be given to on-site janitors and their equivalent, responsible for key estate and plant upkeep. RIS also asked schools for data on holidays, absences, policies etc. On the same day, SCIS sent RIS a state of play of pupils currently away from their home country.

38. On 18 March, I also sent a formal letter to the First Minister on issues concerning independent schools.

39. On 19 March, I passed to schools details of the Deputy First Minister's statement to Parliament on examination cancellations. On the same day, the notification of school closures was sent by RIS to all independent schools.

40. On 20 March, I passed to schools details from the UK Cabinet Office as to what constituted a key worker, given the confusion within the public.

41. On 30 March, I discussed with SFIO the possibility of delaying the introduction of the mandatory GTCS registration of independent schoolteachers, given school closures.

42. Scottish Government sources also confirmed: *"We are going to great lengths to support businesses and are offering a package of support worth £2.2 billion for businesses. This includes a 1.6% non-domestic rates relief which will be applied automatically to all properties in 2020-21, including independent schools. This is on top of any charitable rates relief or other relief that may be in receipt of. Recognising the impact of the COVID-19 disruption on independent schools, the Scottish Government is considering ways to further assist the sector, including delaying the removal of its eligibility for charitable rates relief."*

43. By 9 April, I was informing SFIO, RIS and Public Health Scotland of offers from schools to manufacture PPE face masks and clothing, and provide parking and possible accommodation for NHS staff at boarding schools. This offer was confirmed by the Scottish Government NHS Supply Chain Response Team on 17 April, and by the Portfolio Manager – Collaborative Procurement - Corporate & Professional Services, Scottish Procurement and Property Directorate on 28 April.

44. On 13 April, the Deputy First Minister wrote to SCIS to confirm a temporary suspension of one year of the measures in the Non-Domestic Rate Act concerning independent school business rates, following the communications from SCIS to Ministers in March. (A similar note to Ministers with information on financial issues for schools was sent on 25 January 2021 on business rates, as well as SQA fees, which led to a further rates postponement.)

45. On 25 April, RIS circulated details to schools and SCIS on the expansion of key worker definitions and provisions.

46. On 5 May, SCIS sent to SFIO and RIS details from other international independent schools on how a range of issues were being handled in their jurisdictions, including alert levels and infection control.

47. Regular meetings were held with boarding heads throughout the pandemic as residential issues had a particular and specific importance – accommodation, isolation, travel, visas etc. In May 2020, SCIS

drafted guidance for boarding schools that was shared with SG and the Care Inspectorate. That guidance was issued in late May, and updated on regular occasions as guidance changed, the first being in late July 2020.

48. On 12 May, SG replied to a request made in March by SCIS to the Scottish Public Pensions Agency confirming the possible postponement of the collection of employer contributions to the Teachers' pension schemes for an initial three-month period from April 2020 A formal request for a deferral period in employer contributions had been made via the Department for Education in London following the request. Until that point, independent schools had not received any reliefs or "holidays" of any kind, because they were considered alongside state schools which did not need individual relief, due to their funding.

49. On 21 May, RIS circulated the Strategic Framework for the reopening of schools to all independent schools.

50. In June and July, along with support for the residential part of schools' guidance, SCIS also sought continued updates from the Scottish and UK travellers to/from abroad guidance, especially in light of the provisional reopening date of 11 August. On 8 July, SCIS sought clarification on the use of "primary school age" children in reopening guidance, given that preparatory schools traditionally retain pupils up to the age of 13. Other issues such as distancing and face coverings in residential settings continued to be raised.

51. On 14 August, updated guidance on school trips was sent by SFIO and RIS. SFIO sought guidance from SCIS as to nationwide publication of data on all schools, as had been undertaken for state schools.

52. Following the return to school for the 2020-21 school year, schools began to inform SCIS, RIS and Public Health Scotland of any confirmed or suspected cases of COVID-19 in schools.

53. On 21 August, SFIO informed SCIS that schools would be included in asymptomatic testing programmes which were later extended to all school staff and senior pupils.
54. On 18 November, I wrote to the Deputy First Minister to seek clarification on a range of issues related to end-of-year travel.
55. On 7 January 2021, SFIO agreed updated guidance for boarding schools on fostering and guardianship arrangements for boarders unable to travel.
56. In January 2021, as vaccination became imminent, SCIS supported moves to prioritise teachers in the first phases of vaccinations.
57. On 14 January 2021 RIS shared a letter from OFQUAL regarding GCSE, AS, and A level qualifications as a small minority of independent schools offer these qualifications.
58. In January 2021, SFIO started to gather delivery information from schools for delivery of testing kits.
59. By June 2021, boarding guidance was being updated again by SFIO and SCIS observed that:
    I. How much of guidance would change or be amended as and when the wider SG plans for life "beyond 0" are produced?
    II. Was there any prospect of a reduced isolation through testing for amber countries, albeit given incubation issues - i.e. including travel time etc?
    III. Was there refinement on contact tracing and impact on wider school?
    IV. What would the situation be as vaccinations reached school-aged pupils?
    V. What would the situation be for pupils who return from other countries having been vaccinated?
60. Considerable confusion remained throughout the first term of the 2021-22 session about gathering at sports events. Parents and pupils raised many questions, in addition to the questions raised by staff.

61. On 13 September 2021 I advised that: *"We have to date pointed to the general advice (in section 58-64 of the guidance) against school gatherings and visitors. We have also pointed out that while this is guidance it is not law, and parents have been very quick to point out the different advice for club sports - which are much more open - as well as larger sporting and cultural events. Now that the isolation periods have passed, I have asked the Government to agree to a more collective approach for something more permissive while still risk assessed. I know there is real frustration and unhappiness, especially for parents who travel to drop their child off anyway, and there is a morale and mental health element to support and some normality too. School sport requires the support and agreement of competing schools anyway, but - short of any advice being dropped altogether - schools could agree to spectating based on a possible combination of:*

- *well-ventilated spaces, namely outdoor pitches, in the main*
- *parents to arrive with negative lateral flow result (and possibly their vaccination letter downloaded as back-up, if they have it)*
- *strict 2 metre distancing while mitigations remain*
- *possibly even an attendance register - real or online - as would have been done for contact tracing?*
- *All of this would form part of schools' ongoing risk assessments, including changing rooms, and subject to any local issues.*

62. This was intended to prevent anyone being tempted to break ranks or come up with bilateral solutions or pointing out what were seen as unfair comparisons with SportScotland advice for clubs beyond level 0. The issue was picked up by the media that same week. A Joint Statement from schools was sent to SG.

63. Guidance on such activities was finally dropped in confirmation to schools on 13 April 2022.

64. On 1 October 2021 I was able to confirm to schools, following guidance from SFIO, that:

65. Boarding school pupils travelling from or through non-red list countries should follow the applicable International Travel Regulations and guidance.

66. International Travel Regulations continued to provide that boarding school pupils travelling to Scotland from red-list countries can and must isolate in their boarding school accommodation for the prescribed period.

67. The guidance also advised that an additional mitigation would be to consider all boarding pupils taking a PCR test on their return to school. This was in addition to non-symptomatic LFD testing programme. Schools could order PCR tests through NHS Inform or, for larger quantities, in liaison with Scottish Government (although an initial batch of PCR tests should be sent automatically in the comings days/weeks).

68. Red/Amber/Green conditions ceased to exist that week.

Coronavirus (Recovery and Reform) (Scotland) Bill

69. SCIS was in touch with SFIO and the Bill team as soon as consultation on the Bill was announced. SCIS responded to the consultation, in the main to question the need to assume the power permanently to alter schools opening/closing, rather than as and when emergency circumstances required it.

70. SCIS was of the view that the possibility of a risk of non-compliance or reluctance on such a key public health matter was unlikely and not evidenced by any previous interaction with the sector. Equally, the possible persuasive effect of temporary emergency legal measures was unknown and not grounds for permanent change. SCIS also advised SG that "*in terms of public health, numbers show that the biggest risk boarding pupils - particularly international ones - have faced during the pandemic is infection from the local community, rather than being the ones who might have brought a spike in infections into any school*."

71. Any questioning from individual schools or the sector, as a whole, about the legal basis was entirely to ensure they were compliant under their own covenants as charities and as independent companies, rather than as bodies of local government. It was not to question the measures themselves. Schools remained of the view that temporary measures as and when required will be sufficient.

72. The Government amended its proposals so that:

    I. rather than directions the powers will be via regulations, giving more of a role to the Scottish Parliament

    II. any closures would only be recommended to ensure educational continuity in another form

    III. any restrictions would be for 21 days, requiring re-confirmation for any extension.

73. The measures relating to boarding establishments talked of any measures being to "provide support for pupils", rather than measures which might purely have been seen as confinement. It would mean that

the Educational Continuity notices that the Government issued every 21 days during lockdown, to extend closures and other measures for state schools, would also apply to independent schools.

74. I reinforced with the Government the need for a form of contingency or reference group including schools themselves should specific measures for boarding accommodation be required again, as they have been during this pandemic. To date no such reference group exists.

75. The last regular updates I sent to schools were sent in September 2022, advising schools of further details of the Covid-19 Inquiry, and plans to trial an electronic vaccination consent programme, to increase pupil uptake.

Wellbeing

76. The experience of SCIS schools was similar to that of schools in the state sector. The impact of school closures on pupils was significant in terms of their wellbeing.

77. The loss of opportunities for socialisation was acute. The decision to stop sports activities, concerts and assemblies had an impact on both mental and physical health and social development.

78. Some schools introduced online opportunities for physical activity sessions and school assemblies which provided an important focus and sense of belonging. There were examples of online social events which provided an opportunity for pupils to engage with their peers.

Online learning

79. The majority of SCIS schools developed an online learning offer within days of the pandemic being declared. Pupils were expected to attend these sessions in the same way as they were expected to attend school lessons and attendance was marked and absences followed up. Remote teaching mirrored the normal curriculum timescales and homework was set in the normal way. This model sought to mitigate the lost learning aspect of school closures.

80. Pupils were in the main already using digital devices prior to the pandemic therefore access to technology was not a major problem, nor was access to the internet. For boarding pupils there were time zone issues accessing live online lessons, but schools made arrangements with individual pupils to work around their circumstances.

81. Schools found ways to deliver all aspects of the curriculum. This included PE lessons, with daily activities set and music and drama performances taking place online. There was an expectation from families that learning and educational experiences should take place at the same level as took place in the classroom prior to lockdown. Schools agreed this expectation was reasonable and took an innovative approach to the delivery of education across the full curriculum.

82. By the time of the January 2021 lockdown, schools had sophisticated online learning offers and strong communication channels established with pupils and their families. This resulted in high quality education delivery. However, there were greater concerns reported about the wellbeing impact of a second lockdown, and this became the priority area of concern.

Lessons learned

83. We appreciate the opportunity the Inquiry has provided for the sector as a whole to be considered as part of its work. To assist the Inquiry, SCIS conducted a survey of its member schools asking if they, their staff and pupils were adequately considered when decisions about the response to the Covid-19 pandemic were made.

84. The responses received showed that 75 per cent of SCIS member schools do not believe that they, their staff and pupils were adequately considered when decisions were made. Twenty-five per cent of respondents considered that they were adequately considered.

85. During the Covid-19 pandemic, the views of our member schools were represented to the Scottish Government civil servants and Ministers,

the Care Inspectorate, the Registrar of Independent Schools, the SQA and Education Scotland through regular dialogue with SCIS.

86. SCIS considers the level of access and quality of engagement between the organisation and officials in those bodies to have been extremely high.

87. We appreciate that the decisions which required to be taken during the pandemic were being made at great speed with the intention of keeping as many people as safe as possible and our feedback should be viewed in the spirit of constructiveness to help the Inquiry with its aim of establishing the facts and learning lessons.

88. There were more than 2,600 young people being educated in boarding schools in Scotland, many of whom were international pupils. There was little understanding that for these pupils their school is also their home during term time, therefore restrictions were impacting on their education, home life and also their ability to travel to see family.

89. One school pointed out that nobody thought about how the restrictions might impact an eight-year-old international boarder.

90. The Covid-19 restrictions imposed in boarding houses didn't fully consider the fact that the boarding house is a home, not a school, environment. Pupils returning from the EU were required to spend several days in quarantine in the boarding house before the start of the school term.

91. They were unable to use the communal areas of the boarding house, and this posed a considerable wellbeing risk. Pastoral staff managed the situation as well as they could and provided as much support as possible. However, if the overall wellbeing of children had been at the centre of decision making, and if there had been a greater understanding within the health and education system of how boarding schools operate, it is unlikely the decisions around restrictions would have been implemented in the way they were.

92. Our members have highlighted that the Scottish Government largely ignored all requests for schools to remain open at the time of the second lockdown, despite evidence of a low mortality rate generally and children remaining largely unaffected.

93. In other words, they argue that children's needs were being sacrificed to protect another section of society and our schools believe they are still suffering the consequences of this misguided decision.

94. In common with the state sector, our schools regularly learned about headline decisions on restrictions by way of announcements in the Scottish Parliament or on televised briefings. They say there was a protracted wait for them to receive the required information about how the decisions would be enacted in a school environment and this time period proved difficult to manage in a school environment.

95. There was too much emphasis on detailed regulations which could never truly have been tailored to the circumstances of individual schools. Whilst there was merit in that approach, not least because it took pressure away from school leaders who would otherwise have been tasked to make decisions themselves, it also led to situations which lacked apparent common sense, and this served to undermine confidence in the rules generally.

96. One example of this was the point in time when it was legitimate to have spectators watching a match on a Grandstand Pitch if it was played under the auspices of Scottish Rugby Union, but the same people would be breaking the rules if they stood in the same place and happened to be watching a school organised match.

97. In general, SCIS members believe the rules for schools failed to cover with sufficient sensitivity, logic or care, elements of school life such as music and drama as well as sport.

98. The specialist schools also felt there was too little understanding of the education they provide. Some of the most vulnerable pupils in Scotland

are educated at SCIS specialist schools, and in many cases, the impact on these learners was quite different.

99. For example, for pupils with autism and related communication challenges, the narrowed experience of online classes, outreach work and tight 'bubble' systems worked very well in the short term, but to the detriment of longer term aims to be able to access the community and develop independent living skills. In these specialist settings, schools have worked hard to forge strong partnerships with external agencies and multidisciplinary teams, and the competing needs of these teams throughout the pandemic fractured the hard-won, shared understanding to meet the needs of children and young people at risk of exclusion.

100. The fact that children in residential school care were at times not allowed to see their families and/or only see them for a fleeting moment through a window without been able to touch and/or hug each other was heart-wrenching at best. Social closeness and awareness of those near to them who were now not able to interact was unfortunate and detrimental to all concerned.

101. In many instances the critical elements of consistency and continuity of care and support of these learners was undone by the mixed messages and unbending regulations that did more harm than good.

102. Only now are these relationships beginning to heal and return to pre-Covid 19 pandemic levels. Perhaps the response and regulations forced on our schools was disproportionate to what was actually required and had the reverse effect of what was intended.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false

statement in a document verified by a statement of truth without an honest belief of its truth.

Signed:

Personal Data

Dated: 4 July 2025