

Witness Name: Jonathan Arrowsmith

Statement Number: First

Exhibits 130

Dated: 3 February 2025

UK COVID-19 INQUIRY

WITNESS STATEMENT OF JONATHAN ARROWSMITH

I, Jonathan Arrowsmith, of The Government Commercial Function (based currently at The Department for Business and Trade, Old Admiralty Building, London, SW1A 2DY) will state as follows:

Introduction and Overview

1. I make this witness statement at the request of the UK Covid-19 Inquiry (the 'Inquiry') and in response to the rule 9 request dated 25 June 2024 and revised on 12 August 2024 (the Rule 9). I have been asked to address my role in the procurement of key healthcare equipment and supplies and my understanding of the establishment of the High Priority Lane and any role that I played in its operation and supervision. I have also been directed to a table of offers that were processed through the High Priority Lane and have been asked to comment on the role which I played in respect of any of those referrals.
2. This statement is set out in four sections.
 - a. In **Section A**, I provide a brief overview of my career to date.
 - b. **Section B** addresses my understanding of the establishment of the High Priority Lane.
 - c. In **Section C**, I outline the role that I played in any of the referrals to which the Inquiry has directed my attention. This section also explains how I was introduced to Uniserve Limited ('Uniserve'), the company which I referred into the High Priority Lane and identifies a number of communications relating to PPE Medpro Ltd.

- d. In **Section D** I provide some observations on learning, from the perspective of my experience at the time, together with some concluding remarks.
- 3. When compiling this statement, I have had access to and have read the introduction and those parts of the Corporate Witness Statement of Gareth Rhys Williams dated 5 July 2024 ('the Corporate Witness Statement') which pertain to PPE.
- 4. For completeness, the Rule 9 requests that I provide communications (including WhatsApps and other means of electronic communication) between myself and other officials or civil servants about the award of certain contracts and the referral of suppliers into the High Priority Lane. I communicated via Google Instant Messenger which was the messaging service used in the office at the time but confirm that I did not communicate about such matters via WhatsApp and I do not have relevant WhatsApp communications in my possession.

SECTION A: OVERVIEW OF CAREER TO DATE

Background

5. I am employed by the Government Commercial Organisation, which employs commercial professionals at grade 7 upwards across the Government Commercial Function and which is part of the Cabinet Office. I have been so employed from December 2018 to the date of this statement.
6. I joined the Civil Service in December 2018 as an Associate Commercial Specialist in the Government Commercial Function Complex Transactions Team ('the Complex Transactions Team'). This is the equivalent of a grade 6 civil servant, which is a senior grade (although not a Senior Civil Servant).
7. Prior to this I spent 8 years working as a management consultant with the consultancy firm PwC, commencing in November 2010, dealing with and advising on various procurement projects including Government procurement. While I am not a lawyer by background, in this role I gained a comprehensive knowledge of the various procurement regulations.
8. I am now a Commercial Specialist in the Government Commercial Function (the equivalent of Deputy Director – which is a Senior Civil Servant) and took on that role when taking up a placement with the Department for Business and Trade ('DBT') in March 2024.

The Complex Transactions Team

9. The focus of the Complex Transactions Team is procurement and commercial work. As an Associate Commercial Specialist in the Complex Transactions Team in the Government Commercial Function, my role was to assist government departments with their various procurement and commercial requirements.
10. Between my joining the Civil Service in December 2018 and February 2020, the types of work on which I was engaged with the Complex Transactions Team included, for example, dispute resolutions, devising commercial strategy, negotiating variations to contracts and running competitive procurement exercises.
11. I undertook quite a variety of work for different departments. Examples of such work included renegotiating a contract for pilot training at the Ministry of Defence, procuring a support service, on behalf of Her Majesty's Revenue and Customs ('HMRC'), to

advise businesses how to move goods into and out of Northern Ireland from Great Britain, and advising the Ministry of Justice how they could improve the commercialisation of prison workshops. Immediately prior to being assigned to work with the Civil Contingencies Secretariat in March 2020, I was working with HMRC on an IT procurement strategy [JAR/01 - INQ000528469].

Assignment to the Civil Contingencies Secretariat

12. The Complex Transactions Team worked with departmental clients on a range of matters. When the pandemic started, we were a team that could be redeployed onto pandemic related work relatively easily.
13. In March 2020, when the risk associated with Covid-19 began to increase and the UK Government raised the risk level from 'moderate' to 'high', the majority of people in the Complex Transactions Team were deployed across various Covid-19 related work streams. I, along with Dan Roberts and Thomas Lawson, was assigned to work with the Civil Contingencies Secretariat in the Cabinet Office [JAR/02 - INQ000528467].
14. It was very much a case of 'all hands on deck'. There was no specific selection process of which I was aware. Existing clients were told that we would no longer be working for them, we finished what we were doing and we moved on to the Civil Contingencies Secretariat.
15. I had not worked for the Civil Contingencies Secretariat prior to this. My role in this team was to lead on the procurement and contract negotiations for modular buildings which would be used to provide additional mortuary capacity to accommodate anticipated excess deaths which would arise as the prevalence of Covid-19 increased across the United Kingdom [JAR/03 - INQ000528468].
16. My main duty during this time concerned the negotiation of a contract for the provision of modular buildings with Portakabin UK Limited which was signed on 27 March 2020 [JAR/04 - INQ000528471; JAR/05 - INQ000528472]. For that purpose, a Crown Commercial Services framework agreement was used. This work was entirely separate from my subsequent work with the PPE Buy Cell.

Redeployment to the PPE Buy Cell

17. I continued in the role with the Civil Contingencies Secretariat until 14 April 2020, when I was redeployed to the PPE Buy Cell as part of a surge resource in order to assist the

Department for Health and Social Security ('DHSC') in obtaining better visibility of the status of recently ordered PPE.

18. I was redeployed on the same contractual terms. The Complex Transactions Team would sign a letter of engagement with the client department.
19. My redeployment is illustrated by a Government Commercial Function ('GCF') Covid-19 Daily Briefing for Key Projects, issued on 14 April 2020. Whilst I do not believe that I would have received this document at the time, it states, within a 'PPE Procurement Cell Dashboard: 11th-13th April 2020' to be found on page 3, under the heading "*Key request for DHSC*": "*Need visibility of UK logistics process – Jonathan Arrowsmith deploying 14/4 to support*" [JAR/06 - **INQ000497252**].
20. In this role, my direct employer remained the Government Commercial Organisation but the PPE Buy Cell reported to DHSC. I reported to people in the PPE Buy Cell, not to anyone else in DHSC. The PPE Buy Cell was an amalgam of different organisations and was staffed from different government departments. Whilst I do not recall being sent an organisation chart at the time, I can now see that an updated PPE Sourcing Team organisation chart was sent to me by Alice Dodden, Portfolio Management Office Lead, Government Commercial Function, on 14 April 2020 [JAR/07 - **INQ000528479**]. I understand that enquiries have confirmed there is no attachment to [JAR/07 - **INQ000528479**] and that only an extracted text version of what may have been the document is presently available [JAR/08 - **INQ000489798**]. I knew Alice Dodden, who had a central coordinating role.
21. I continued to work in the PPE Buy Cell for 5 months, until September 2020, when I took a placement with HMRC, with the Complex Transactions Team, to deal with Brexit related matters.
22. I left the Complex Transactions Team in March 2022 and took a placement at the Foreign, Commonwealth & Development Office ('FCDO') for 2 years until March 2024 when I took a placement with the DBT.

SECTION B – THE HIGH PRIORITY LANE

23. At the outset, it is worth stating that my work with the PPE Buy Cell took place over 4 years ago and was at a profoundly busy and challenging time early in the Covid-19 Pandemic. While I have tried to recall events as best I can, and while I have been shown various documents and correspondence in the course of drafting this statement, it is a challenge to recall with any precision, the events at this time. This is particularly so in respect of the HPL which, save for the referral of one offer, was a workstream with which I had limited involvement.
24. By the time I joined the PPE Buy Cell, which was partly staffed by the Complex Transactions Team, in April 2020, the High Priority Lane (the 'HPL') had already been established. As such I played no role in the creation or establishment of the HPL.
25. I also did not have any role in the operation and supervision of the HPL. As is addressed further below, Uniserve was the only referral I made into the HPL personally.
26. Prior to joining the PPE Buy Cell, I had no knowledge of the HPL. I do not now recall receiving any document or work instructions explaining the PPE Buy Cell or HPL. Documents which said what the PPE Buy Cell did, may have existed, but not, so far as I was aware, documents which were specific to my role.
27. Upon joining the PPE Buy Cell, I became aware of the HPL through discussions with colleagues in the Complex Transactions Team (although I cannot remember who and when), about how the PPE Buy Cell had been set up to operate.
28. I recall that there was an Opportunities Team. This team reviewed prospective offers and triaged the leads. I was not part of this team and did not triage any such offers.
29. At the time at which I joined the PPE Buy Cell I was aware that referrals into the Opportunities Team was an avenue by which offers could be submitted. Subsequently, I became aware of the existence of the HPL as outlined above. It was my understanding from discussions with colleagues, although I cannot now recall which colleagues, that government ministers and their private offices were saying that their leads were not being dealt with sufficiently quickly and that, as a consequence of feedback from ministers' offices, the HPL had been established. The wider context was that there were hundreds, if not thousands, of leads that were unprocessed.
30. I do not know whether the Opportunities Team dealt with Uniserve.

31. It was my initial understanding that the HPL was a mechanism set up to address leads that were referred to the PPE Buy Cell by government ministers, which needed to be processed and dealt with quickly. This was consolidated by the fact that it was also known as the 'VIP' lane and it was my understanding that the term VIP referred to government ministers. I did not come across the term 'senior referrers' at any point in the context of referrals into the HPL. I do not now recall, however, anyone saying expressly that the HPL was for government ministers. It was my initial impression from discussions with colleagues that there was a culture that sought to prioritise offers which were being referred into the PPE Buy Cell by government ministers because ministers were demanding that they be dealt with quickly. I believe that there was also a perception that, because the leads were from ministers, they were likely to be more credible than many of the other offers being submitted. However, I was not aware of the nature of the offers which were being referred into the HPL by my colleagues, or how quickly they progressed through the system, and I cannot speak to the accuracy of the impression I formed. In any event, my understanding of the HPL when I engaged with it was different to that initial impression, in that I referred Uniserve to it which was not at the time a ministerial referral, and I interpreted it to be a mechanism by which the most credible offers, which might include non-ministerial offers, may be processed.

32. I was never aware of any 'threshold' or of any guidance on credibility and there was never any discussion with me as to the threshold for referring into the HPL. I am still unsure as to what would distinguish a 'credible offer' which would be processed through the HPL from other types of offer that would not. In the case of Uniserve, I came to understand what they did as a company and what their capabilities were. For example, they could source PPE, they had sourced PPE for the DHSC previously, and they had a global reach. Consequently, I formed the impression that Uniserve were a credible source.

33. An early example of the distinction between a referral into the HPL and a generic referral to the Opportunities Team in which I was involved, can be found in a sourcing query which came from Patrick Allen of Henry Schein Dental.

34. I have been shown an email chain which originated from an email from Major Bruce Ekman RLC MBA dated 21 April 2020 at 11.44 concerning a possible dental lead from Henry Schein Dental for a large quantity of FFP 3 Masks [JAR/09 - INQ000528506].

35. Whilst, in that email, Major Ekman stated to Sara Hurley, Deputy Strategic Commander - COVID-19 NHS England and NHS Improvement and Chief Dental Officer for

England: "*I would be most appreciative if you could kindly follow this up with Andy Wood, however I understand that he has empowered Jonathan Arrowsmith to compile a list of suppliers and to ensure that they are followed from Point to Point.*" I do not recall having been asked to compile a list of suppliers and there is possible confusion here with what I had been asked to do. I address my role and remit below.

36. Whilst I do not recall dealing with Henry Schein Dental, it is apparent from that email chain that, at 11.55 on the same date, Sara Hurley introduced me to Patrick Allen by email and that, at 13.03, he emailed me direct concerning his proposal for an order to be placed **[JAR/09 - INQ000528506]**.
37. At 16.00 on the same date, I wrote to Patrick Allen, copying in Sara Hurley and others, stating: "*Thanks for your email. I've passed it on to the team which is placing orders and have asked for them to reach out directly to you.*" The reference to "*the team*" appears to be to the Opportunities Team, not the HPL. **[JAR/10 - INQ000528507]**.
38. I also replied to Patrick Allen at 17.02: "*I've been advised that the most expedient route would be to email gcfcovid19enquiries@cabinetoffice.gov.uk*", which would have been the generic email address for the Opportunities Team and to which Patrick Allen has then written at 17.16 **[JAR/09 - INQ000528506]**.
39. On 21 April 2021 at 18.18, Sara Hurley wrote to me and Major Ekman: "*Thank you for the contacts this morning.... Just to keep you in the loop. It would appear after a couple more emails Patrick Allen was passed to the generic box not sure that this is what I had expected given the FFP3 offer. Grateful if you could assure me that action has been taken and we do not lose this very tangible opportunity for the urgent dental care service that Jo Churchill has expectations for.*" **[JAR/10 - INQ000528507]**.
40. Sara Hurley's enquiry appears to have been as to why a good opportunity had been referred to the generic inbox. I recognised that she was the Chief Dental Officer and was asking for something to be done and, at 18.34 on the same date I emailed Darren Blackburn, **[Operations Lead]** and Max Cairnduff, Deputy Director in the Complex Transactions Team in the Cabinet Office stating: "*All, Please can we do something with this as a matter of urgency? Chief Dental Officer is unimpressed that the lead was directed to a generic mailbox. Apparently Jo Churcill (sic) (health minister) is monitoring. Opportunity is for 1m FFP3 masks*" **[JAR/10 - INQ000528507]**. As far as I recall, this was my last involvement with this.

41. While I was not copied in, I have been shown a further email chain in which Hannah Bolton wrote to Patrick Allen at 22.15 on 21 April 2020, stating:

"I am working with senior members of the UK government as part of a cross-government team set up to urgently and centrally source PPE supplies for front line staff.

Jonathan Arrowsmith shared your details and I understand that you may be able to help provide PPE and in particular FFP3 masks. Thank you for your offer of support, please accept my apologies for the delay in getting back to you." [JAR/11 INQ000528510]

42. I do not now remember sharing the details with Hannah Bolton, if I did so.

43. I do not recall without reference to documentation, whether there was an HPL email address or whether a referral would just be sent to an individual or, if there was a particular email address, what it was or who gave it to me. At the time, either I would have known the email address to use or I would have asked someone how to make a referral. I have been shown [JAR/12 - INQ000528485] which is an email chain which was forwarded to me by Jo Newman on 14 April 2020 within which, on 12 April 2020, Gus Wiseman (Trade) had said: *"VIP / Fast Track enquiries can copy covid-ppe-priority-appraisals@cabinetoffice.gov.uk"*. I have been shown [JAR/10 - INQ000528507], [JAR/11 - INQ000528510], and [JAR/13 - INQ000528514], and [JAR/14 - INQ000528543], from which it can be seen that there was, in fact, an email address for referrals into the HPL, which was the 'Covid PPE Priority Appraisals Mailbox' and that I used it as described below.

44. If, as I believe to have been the case, the 'Covid PPE Priority Appraisals Mailbox' was the HPL email address, then the offer from Henry Schein Dental outlined above may ultimately have been referred through the HPL. Hannah Bolton had copied her email to 'Covid PPE Priority Appraisals Mailbox'.

45. As far as I recall, I did not know that this offer had been referred into the HPL at the time. I do not know the extent to which it can be distinguished from the Uniserve offer to which I refer below in terms of any ministerial involvement but do note that I had observed that a minister was monitoring it [JAR/10 - INQ000528507].

46. I have been shown an email dated 25 April 2020 from Rob Brown, Project and Business Change Manager, Government Commercial Function, which forwards an

email of 23 April 2020 which reads, in part: "*There is a Make-Cell Mailbox we would like you to use for all enquiries related to novel manufacturing of PPE. This dedicated mailbox has a process in place to best handle Make enquiries.*" [JAR/15 - INQ000528512]. That email then provides an email address. The Make Team was a team of people working with potential suppliers who were going to make and manufacture PPE in the UK. That was different from the PPE Buy Cell, which was sourcing PPE globally. I did not have regular dealings with the Make Team. The email address provided in that correspondence was not an email address for the HPL.

SECTION C

47. In this section:

- a. Paragraphs 48 - 57 address what my role was within the PPE Buy Cell, which was essentially to put in place procedures which would improve the monitoring of PPE goods as they moved through the supply chain.
- b. In order to provide context as to how it was that I came to be introduced to Uniserve, in paragraphs 58 - 84, I set out some of the early attempts to develop an effective process for monitoring the supply chain and some of the difficulties that I encountered in setting about my role to put in place procedures which would improve the monitoring of the supply chain.
- c. In paragraphs 85 - 169, I set out how Uniserve came to be the provider of supply chain management software.
- d. In paragraphs 170 - 211, I set out how it was that I came to refer Uniserve into the HPL.
- e. Finally, at paragraphs 212 - 219, and in response to a specific query from the Inquiry, I address some correspondence into which I was copied which concerned PPE Medpro.

Role and Remit

48. My reporting manager at the time of being redeployed to the PPE Buy Cell was Joanne (Jo) Newman, Operations Manager for the PPE Buy Cell.
49. My job description was very 'high level'. Essentially, I was told by Jo Newman, shortly before transferring, that I was being brought into the PPE Buy Cell in order to devise a process around the contract management and tracking of PPE orders throughout the supply chain. When I asked Jo Newman at that time what that meant, I was told that contracts were being placed but it was not known fully what was happening after that. I was asked by Jo Newman at that time to do something to get clarity over this.
50. Whilst it pre-dated my joining the PPE Buy Cell, I have been shown a set of slides, slide 3 of which is entitled 'Update from Emily Lawson's 8.30am call' and states "*Jonathan Arrowsmith starts on Tuesday 14th to oversee the link between procurement and delivery (Contract Management).*" [JAR/16 - INQ000528557].

51. Upon joining the PPE Buy Cell on 14 April 2020, I was charged by Jo Newman with the task of implementing more robust procedures to adequately monitor PPE products that had been ordered by the PPE Buy Cell as they moved through the supply chain. The aim was to understand the status of orders, to try to expedite them if necessary and, ultimately, to understand when they would be arriving in the UK.

52. My role and remit were quite ill defined and I believe (certainly at the outset of my deployment) that a lot of people did not understand what I was there for. I have been shown a copy of a draft PPE Programme Structure and SPOC dated 13 April 2020, in which my role is described as "*Contract Management*" [JAR/17 - INQ000528503], and a copy of a PowerPoint presentation from 17 April 2020 which identifies my role alongside that of Jo Newman as being "*Operations/Logistics*" [JAR/18 - INQ000528492]. I have also been shown a copy of the Covid-19 PPE Sourcing Hub Handbook in which, at page 2, my role is described as "*Contract Management – Coordination of shipments of products sourced via the New Suppliers workstream through the DHSC emergency logistics service*" [JAR/19 - INQ000528524] and a copy of a PowerPoint presentation from 15 June 2020 [JAR/20 - INQ000528556] which describes my then current "*Contract Management*" workstreams. I do not now recall having seen these at the time. I had to craft my own role and work out where I could add value. From time to time, people asked me to do things which I could not do.

53. I also worked quite closely with Chris Hall, the Government Deputy Chief Commercial Officer.

54. As stated above, a lot of people were unsure of what it was that I did in the PPE Cell, and as such I was often copied into emails which did not relate to matters with which my role was concerned. For example:

- On 27 April 2020 I was copied into an email chain concerning a cargo train proposal for the delivery of PPE from China to the UK which appears to have originated through an email address which was available to the public. I may have been copied in as it concerned freight and as Max Cairnduff would have been aware that I dealt with supply chain issues, but I did not deal with this matter [JAR/21 - INQ000561930];
- On 29 April 2020 I was copied into an email chain concerning a PPE platform and containing what appears to be the email address for the HPL to which I refer above, in which Max Cairnduff wrote: "*Not sure where this goes, but Matt Hancock has*

taken a personal interest". I do not know why it was that I was copied into this email chain [JAR/13 - INQ000528514].

55. I have read paragraph 4.305 of the Corporate Witness Statement and confirm that it was my understanding at the time that Cabinet Office officials in the PPE Buy Cell did not have the authority to approve or sign contracts and that the formal contracting role was with the DHSC. I did not have the authority to approve or sign contracts.

56. I did not have any role in the procurement of

- i. Ventilators;
- ii. Lateral Flow Tests;
- iii. PCR Testing Equipment.

57. On 07 May 2020 I was contacted by Max Cairnduff with a view to my providing some dedicated contract management support *"in the VIP space"*. In a following email, Jo Newman stated that she believed he was asking due to my knowledge and how it would impact me in my new role [JAR/22 - INQ000528531]. As far as I recall, nothing about the role I had at the time changed subsequent to receiving that email.

Processes for supply chain management upon my joining the PPE Cell

58. I became aware that there was a team developing process maps on a variety of different processes, for example, how to conduct due diligence on potential suppliers, but my involvement with them was fairly limited. I do not know the name of the team but have been shown an email of 14 April 2020 concerning PPE process flows and am able to say that Richard James, a Commercial Specialist with the Complex Transactions Team, who wrote that email, was involved with it [JAR/23 - INQ000528481]. I had some but did not have many, interactions with that team. I have also been shown a copy of a document entitled "Covid-19 Personal Protective Equipment (PPE) E2E Process Maps April 2020" [JAR/24 - INQ000551580], which is identified on page 1 as a draft. I do not recall having seen this document at the time.

59. Slide 9 of a set of 'C-19 SUPPLY Programme PPE Buy Process Workshop' slides dated 14 April 2020, the date on which I joined the PPE Buy Cell, states, in part *"Suppliers from 'Signature' through into 'Logistics' is not well managed"* with the 'Impact' being identified as *"Challenge to plan 'inbound logistics' and 'distribution'"*. While I did not have sight of it at the time, that document identifies Edward James and

me as the Owners in respect of that issue [JAR/25 - INQ000528487]. Edward James was Deputy Director and Head of Procurement in the Commercial Directorate, Department of Health & Social Care.

60. When I was trying to find out the status of contracts, I was provided with a list of contracts and with contract documentation. Everything was done over email and things were being emailed to me constantly.
61. There was an internal data repository tool called Mendix. This platform was used primarily for the storage of documentation and it could not be used for tracking contracts nor did it provide visibility on the supply chain. I had access to Mendix and, while I was unable to use it to track PPE products as they moved through the supply chain, I used it to better understand what contracts were in place.
62. I have referred above to the purpose for which I was redeployed to the PPE Buy Cell and to certain communications in that regard. It was apparent to me from the outset that there was no effective system in place in the PPE Buy Cell for logging a contract and then tracking it end to end throughout the supply chain. At the time of my joining, the PPE Buy Cell had only been in place for approximately 3 weeks from initial conception. The processes that were in place in the PPE Buy Cell were not sophisticated. In many instances, the only tracking that could be achieved would be by attempting to email or telephone a supplier and asking them what was happening with a particular contact.
63. On 16 April 2020, I received emails concerning the "*Tiger Team End to End Process*", within which it was stated by Barry Hooper:

"Recent events has [sic] demonstrated that we do not have a golden thread that brings the process steps together. As a result we need to guarantee certainty of supply lines and dates when items arrive for distribution. We have set up a tiger team (under the direction Ed, who will look at the critical product lines) today to get a real sense of the total picture." [JAR/26 - INQ000528488]
64. The various members of this Tiger Team and their respective roles, is at [JAR/26 - INQ000528488] from which it can be noted that I was '*appointed to help with the gaps in the back end of the process.*'
65. Within these emails it was stated:

“Barry is chairing the meeting and has advised that the meeting will cover the end to end process and how we plan to track orders from beginning to end.” [JAR/26 - INQ000528488]

66. Barry Hooper, who was the Chief Commercial Officer at the Ministry of Justice, had been drafted in to help with the PPE Buy Cell. I think the reference to the “*Tiger Team End to End Process*” reflected an attempt to get a grip on the end to end process, from receipt of a lead through to contracting, and tracking orders through to delivery. Whilst I recognise some of the names in [JAR/26 - INQ000528488], I do not think it was a formal team but that this was an attempt to bring a group of people together and to bring clarity to the process. I am unable to recall if the “*Tiger Team*” was a team that met on regular basis and I do not now remember the meeting to which reference is made or anything that flowed from it.
67. On 22 April 2020, I and a number of others received an email from Major Bruce Ekman in which he stated:

“Issue. My team and I have been informed that the COVID-PPE Combined Tracker, which we have created from the input from the China Buy, New Buy and SCCL streams, will be sent to Government daily starting tomorrow afternoon for Parliamentary Scrutiny on what stocks are inbound into the NHS Supply Chain.

Recommendation. I would therefore like to kindly urge you to input, clarify and increase the fidelity of as much of the data in your individual spreadsheets as possible.

Timing. This information, about the combined tracker being briefed to Government every day from tomorrow afternoon, will be briefed formally at tomorrow mornings 0830hrs meeting. Therefore my team and I kindly request your updated information by 1100hrs tomorrow in order to collate and to scrutinise prior to sending it on to Government.

Background. The combined input from your three streams (China Buy, New Buy and SCCL) is collated by my team and put into one document (see attached) which is then used to inform decisions about what stocks to distribute.” [JAR/27 - INQ000528509]

68. ‘China Buy’ was a specific initiative to source PPE from within China, through the British Embassy in Beijing and other British interests in China. ‘New Buy’ is a reference to the PPE Buy Cell. ‘SCCL’ (Supply Chain Coordination Limited) was an existing service provider to the NHS. As alluded to in my email below, the context of this

particular email was that all 3 entities were sourcing PPE and this was an attempt to compile management information from those work streams so as to get a complete overview of what PPE was being ordered across them and what the status of it was. It also serves to illustrate that the only visibility of the supply chain was through e-mails and spreadsheets which were updated daily.

69. The following day I forwarded Major Ekman's email to Chris Hall, stating:

"This is a consolidated tracker of orders across all workstreams (China/UK new opportunities, SCCL). I think this may serve your purposes best.

The second spreadsheet (PPE up to 21_04) covers UK new opportunities only and is info gathered from contacting suppliers. It is very immature at the moment (team only started expediting Monday and is still waiting to hear back from some suppliers)."

[JAR/27 - INQ000528509] [JAR/28 - INQ000562771] [JAR/29 - INQ000563209]

70. In a further email of the same date, I added:

"It would be great to get your perspective on the contract mgt piece (of lack thereof) later on this afternoon if you have some time?" **[JAR/27 - INQ000528509]**

71. Chris Hall replied on 23 April 2020, in which he stated, among other things:

"Lots more work to track deliveries, resolve queries, check shortages and non compliance etc. We have many suitably qualified people esp in DES" **[JAR/27 - INQ000528509]**

72. I have been shown an email chain in which concerns were expressed with regard to the tracking of orders and contract management, which commenced on 08 April 2020, prior to my redeployment to the PPE Buy Cell and culminated with an email dated 19 April 2020 from Richard James in which he stated:

"We now have Jonathan Arrowsmith to help out in this area and are standing up resources to do contract management and expediting. Still working out how we deal with returns and complaints though!!" **[JAR/30 - INQ000528497]**

73. I have been shown a further chain of emails between 21 and 23 April 2020 in which, in an email to Chris Hall of the latter date, Bruce Marshall, DES Commercial Strategic Coherence, stated:

“We don’t see many of the finally signed contracts come back to us. For the avoidance of doubt, the opportunity and closing team are not doing anything in the contract management space. There has been a long standing requirement for support to undertake this activity though no one has taken it on. Johnathan Arrowsmith has been brought in to get an arm around it and some Army junior officers were brought in to help chase some of the status of orders down but that was a sticky plaster solution. A request for 2 NHS staff Skipton House based staff has been made through Jo Newman. But the issue is at the DHSC end and the visibility thereafter. The best solution would be to use the NHS Trusts/DHSC commercial staff to do this from the offers of numbers of people have been made. I’ve just not seen any traction in this space; it could be happening though.” [JAR/31 - INQ000561933]

74. Given the urgency that was presenting as a consequence of the pandemic, along with the sheer volume of orders that were being placed, it was clear to me that there needed to be a better system in place for tracking contracts throughout the supply chain. This need is reflected in the communications to which I refer above.

Uniserve and OneWorld

75. I know it to be the case that, prior to my joining the PPE Cell on 14 April 2020, and in circumstances where there were difficulties in monitoring the supply chain (as I outline above), there were discussions about the on-boarding of Uniserve to assist with supply chain management through the deployment of their proprietary supply chain management software One World ('One World').
76. On 09 April 2020, Iain Liddell, the CEO of Uniserve contacted [Operations Lead] Deputy Corporate Functional Manager at the Ministry of Defence and the Cabinet Office NHS PPE Team and others and strongly recommended that Uniserve be employed to provide a supply chain management service [JAR/32 - INQ000561924] [JAR/33 - INQ000561928] [JAR/34 - INQ000561927].
77. Iain Liddell observed in that email that this fitted in with what was being done for the DHSC and that Uniserve could manage by unit, supplier and factory, based on the rules [Operations Lead] wanted to work by. Iain Liddell had also stated that Uniserve could have PO/SKU/Supplier management up and running immediately, that he would allocate people straight away and that this gave exactly what was wanted and made so much sense as Uniserve was doing the international logistics. He had stated that

he had provided [Operations Lead] with temporary access to the system in order to run through it with him, rather than send him a presentation [JAR/32 INQ000561924-].

78. Within the same email chain, by email dated 10 April 2020 to [Operations Lead] and Gemma Smith (DES Comrcl-Ops-CCDT1 AsstHd), Iain Liddell had provided further information on Uniserve's contract and supply chain management services and system, stating that, among other things, "*[Y]ou would have seen from the DHSC site that we capture pretty much all the information you will need and we have processes already well established to do pretty much all you need, we work for many very large organisations and they use One World to run their global supply chains so we know this is the idea [sic] tool.*" He went on to state [REDACTED] Irrelevant & Sensitive [REDACTED] Irrelevant & Sensitive [REDACTED] Irrelevant & Sensitive [JAR/32 - INQ000561924]

79. By way of further context, it is also important to note that, as well as the aforementioned nascent discussions that were being had about the on-boarding of Uniserve to provide supply chain management via the One World software, Uniserve were also providing freight and logistic services to the Government. This is confirmed by a number of e-mails which were exchanged prior to me joining the PPE Cell, but which were ultimately forwarded onto me by Jo Newman upon my joining. These e-mail chains appear at [JAR/33 - INQ000561928] and [JAR/32 - INQ000561924].

80. In one such e-mail, into which I was not copied, and which was sent from Iain Liddell to [Operations Lead] and the Government Chief Commercial Office Gareth Rhys Williams and others on 04 April 2020, he states:

"I am not sure if people were getting confused last week about our position but as you will see from the below message of thanks from the DHSC from yesterday, we are managing the PPE suppliers and flights from China and around the world to where they are needed in the UK. We have Virgin, BA and UPS operating under our direction and running express vehicles with crucial medical equipment from east and western Europe, we are now very much integral to the NHS supply chain in only 2 weeks and it is working well.

With regards to procurement, we know a lot of the PPE suppliers in China and their capabilities, so we offered to help source products but we don't have time to go through "the process", which is where unfortunately it went. We did try, it was a frantic weekend

last week trying to get specifications and certifications across hoping they would be approved on Monday so we could fly them Friday but it never happened.

Holly and [redacted] for your information we haven't hear anything from CAPA, therefore that process doesn't work and all the effort we went to last weekend seems to have been a waste of time.

As I said yesterday we have escalated our offer to help and support the procurement cause, we know we can make a difference (as we have done with the logistics) and our only interest is to support the NHS and Government to beat the virus.". [JAR/35 - INQ000528208]

81. It appears from further email chains of the same date, into which I was not copied at the time but which have been shown to me, that Max Cairnduff identified Uniserve as one of many "*VIP opportunities ... caught up in the approvals backlog*", that Uniserve had contacted "*multiple ministers*", and that the Head of the Government Commercial Function was now personally chasing. He asked that documents be resent, copying in "*the mailbox*" and with "*VIP - High Priority in the subject line*". [JAR/36 - INQ000528477] [JAR/37 - INQ000528475]. It also appears from an email of 8 April 2020 from Chris Hall to the Covid PPE Priority Appraisals Mailbox, into which I was not copied at the time but which has been shown to me, that it was proposed that an apology be made to Iain Liddell [JAR/38 - INQ000528476].
82. I was tangentially aware of terminology used to describe the method of assessing the demand for PPE, such as the 'McKinsey model' referred to in paragraphs 4.324 and 4.327 of the Corporate Witness Statement, but was not part of regular communications as to what the in-demand items were. In the early days, it was a case of getting hold of anything you could and then, as the pandemic progressed, increasing levels of intelligence became available as to what was required. That was communicated through various briefings in the form of daily meetings and power point presentations which were prepared and emailed round.
83. After I joined the PPE Cell, I was also brought into correspondence which concerned Uniserve's logistic offering and while the same is not relevant to the scope of the Rule 9, for completeness examples of this correspondence appear at [JAR/39 - INQ000561929]; [JAR/40 - INQ000528491]; [JAR/41 - INQ000528489].
84. It was in this context and against this background that I was introduced to Uniserve.

The on-boarding of the One World Software

85. In an email to me on 14 April 2020 at 08.48, the day that I joined the PPE Buy Cell, Jo Newman forwarded documents pertaining to the offer from Uniserve [JAR/42 - INQ000561923]. They included a “One World Global Trade Management Technology” brochure [JAR/43 - INQ000528482], a spreadsheet [JAR/44 - INQ000528483] and a copy of the email from Iain Liddel to [Operations Lead] of 9 April 2020 [JAR/45 - INQ000528484].
86. Very soon after I joined the PPE Cell, Chris Hall told me that he had heard about One World and asked me to find out more about it. He asked me to enquire as to the cost and to put a contract in place I followed this up as Chris Hall had asked me to.
87. Sometime shortly after this, I recall having a conversation with Chris Hall who facilitated an introduction with Iain Liddell. On 19 April 2020, Chris Hall forwarded to me an email from Iain Liddell by which Iain Liddell had, in turn, forwarded to Chris Hall his email to [Operations Lead] of 9 April 2020 at 16.28 concerning the Uniserve supply chain management service and which incorporated the temporary link to the One World system and indicated that he would call around 11.00am [JAR/46 - INQ000528494] [JAR/47 - INQ000528495].
88. I had only been in the PPE Buy Cell for 5 days at this point and, at that time, I did not know either Iain Liddell or his daughter Hannah Liddell. At the outset, my principal point of contact at Uniserve was Iain Liddell. He introduced me to Hannah Liddell who took on an increasing role.
89. My understanding was that Uniserve was a family-owned business of which Iain Liddell had control. I did not have any prior personal, professional, business or other type of relationship and/or interest with or in Uniserve, Iain Liddell or Hannah Liddell or any of the employees of Uniserve. As I outline below, over time, the scope of Uniserve’s service widened to bring in more of their team in the provision of a managed service.
90. I also had no prior knowledge of Uniserve’s One World system and it was not until the demonstration to which I refer below that I gained a deeper understanding of precisely what it was, how it operated and how it could assist with supply chain visibility.
91. I was in discussion with Nick Parkes from DHSC about the on-boarding of One World and, at 16.06 on 16 April 2020, I enquired as to whether Nick Parkes had received the

go ahead to proceed with the Uniserve supply chain management system and, if so, what the high level plans were [JAR/40 - INQ000528491].

92. Nick Parkes replied on the same date, informing me that he had confirmed his recommendation to take the product, and that he wanted DHSC staff to be trained in its use. He would advise delivery as soon as he had it. Ultimately, therefore, it was Nick Parkes' recommendation to take the product but the actual decision to take it was probably made at a more senior level within the PPE Buy Cell [JAR/48 - INQ000528490].

93. In response, I asked for confirmation whether, if all orders were placed ex-works from hereon in, this tool would provide complete visibility of incoming products and therefore provide the much sought after answers about when ordered products were going to turn up. I enquired as to how long this would take to implement. [JAR/48 - INQ000528490].

94. Nick Parkes responded to confirm the position and stated that he was about to push the mail "to the seniors" and see where we got to [JAR/49 - INQ000528493]. I sent a follow up email to Nick Parkes at 16.26pm on 17 April 2020, enquiring as to where he had got to (if anywhere) on the supply chain management system [JAR/49 - INQ000528493].

95. On 19 April 2020 at 15.53, I emailed Hannah Stout at the DHSC noting that consistent and accurate tracking of PPE orders across the workstreams was extremely problematic and was causing significant issues for a number of stakeholders, most keenly the demand management workstream which was trying to forecast demand and reconcile this with existing and incoming stock. I explained that Uniserve were offering supply chain management software which would give us the ability to track PPE throughout the end-to-end process from initial order to order completion to delivery to receipting of goods that were purchased through all 3 of our procurement routes: 1) existing suppliers 2) the China workstream and 3) new opportunities. I requested her advice as to how we could move forward on this and indicated that we were looking to progress with having the system up and running and in use by the end of the week and that Iain Liddell was looking to set up a demonstration on the Tuesday [JAR/50 - INQ000528496] [JAR/51 - INQ000561925] [JAR/52 - INQ000561932].

96. Hannah Stout replied at 17.56 the same day, copying in Jen Nichols, DHSC Deputy Finance Director and Edward James, amongst others, observing to them that, as they

would be aware, there was a data gap in the process that was causing “real pain for everyone involved in the PPE Buy cell” and this seemed like a good solution, but enquired as to whether the solution would track goods to Daventry and no further, in which event Clipper’s systems would have to be used to track onward distribution from the warehouse [JAR/51 - INQ000561925] [JAR/52 - INQ000561932].

97. At 11.36 on 20 April 2020, Hannah Stout sent a further email to me as follows:

“I have spoken to Jen Nichols about this. We are definitely supportive of the approach here and this seems very promising. To be able to progress this further we need to be able to get a better understanding of what the software can do for us in practice and to confirm how our finance systems will link to it.

Can you please ensure the cast list cc’d are invited to the demonstration of the software please?

From our point of view we would be keen to a demo asap so we can progress this.

Have SCCL been engaged on this proposal? Have they confirmed they are happy for their data to be submitted into this new tool?

Separately, @Jonathan Arrowsmith can I set up an introductory call with you and Robert White for today, who is leading the technical accounting side of the process mapping? We have a key interface with your work in terms of the information feeds from key points in logistics chain that are required to recognise the financial accounting flows in our accounts.” [JAR/53 - INQ000561926]

98. PowerPoint slides for a daily call, with a parent date of 21 April 2020, which I do not now recall receiving, identified objectives for me for the day as follows:

- *Meeting with Uniserve logistics to receive system.*
- *Get contract management system online, using Uniserve as test case.*
- *Resource in place to define logistics process and MI reporting.*
- *Following tasking to MoD, understand additional resource profile. Task to chase details behind the POs to understand delivery dates.*
- *Define requisite updates to caseworker system to ensure that delivery dates can be captured in a systematic manner”. [JAR/54 - INQ000528504]*

99. At 13.11 on 20 April 2020, a conference call with Iain Liddell was set up for 21 April 2020 in order for the One World supply chain management system to be demonstrated [JAR/55 - INQ000528502] [JAR/56 - INQ000528501] [JAR/57 - INQ000528500].

100. At 13.32 on Monday 20 April 2020, Steven Mitchell, who I think was a contractor who came to work in the PPE Buy Cell emailed Nick Parkes and me to advise that he had spoken with Iain Liddell that day and that they were aligned on the issue and agreed that the One World tracking data base may be a solution to provide visibility across the supply chain and the many unique identifiers being used by the various process teams. He had reached out to [Operations Lead] in the Wave 2 Closing Team to ask how they managed the documentation for all new supplier contracts, this being a key input for the One World system [JAR/58 - INQ000528499].

101. At 14.22 on the same date, a Teams meeting invitation was circulated by Rob Brown for weekly prioritisation board meetings, one of the stated objectives of which was to “*agree the criteria which makes a supplier offer high priority including, but not limited to, type, volume and availability of items offered*”. I do not now recall what the outcome of this was. Rob Brown may not have been referring to the HPL, as opposed to offers which needed to be dealt with quickly. I do not recall attending these meetings. Hannah Stout subsequently queried whether this prioritisation board was still required, given the introduction of PPE log range planning meetings [JAR/59 - INQ000528515].

102. I also emailed Nick Parkes at 16.55 on 20 April 2020 to ask: “*Nick, did you mention that Emily Lawson has given her approval for us to move forward with this? If so, can you send it to me?*”. I do not now recall whether Nick Parkes replied. [JAR/60 - INQ000561921].

103. At 21.18 on 20 April 2020, I emailed Iain Liddell to enquire as to whether the system linked with any DHSC systems (e.g. finance systems) or whether it was independent i.e. they were provided with feeds of data to input. I observed that I imagined that there would be the usual queries about data security etc. [JAR/57 - INQ000528500].

104. At 17.16 on 20 April 2020 Iain Liddell emailed Steven Mitchell and me following a call, to say that it was good news that the One World SCM platform had been agreed and would be implemented as a priority for the DHSC supply chain. I do not recall, now, specific dates or precisely when this was agreed [JAR/56 - INQ000528501].

105. Iain Liddell stated that Uniserve had mobilised their teams and were putting together the urgent DHSC requirements and operating procedures which they expected to have completed by the next day. Iain Liddell identified Uniserve's plan to produce a Master Purchase Order, created from the Contract document and Financial Purchase Order, which could be created by the DHSC or Uniserve. Uniserve would need all contract documents and Financial Purchase Orders to be entered to a Master Intelligence Spreadsheet ('MIS') which would have set rules and drop downs to avoid corruption. The MIS would be checked by Uniserve's data compliance team before going into the system. Iain Liddell explained, further, that once Uniserve had the core data in One World, they could start to build the product flows and information in a proactive way. He set out proposals in that regard and proposed the following timeline:

"1 – 21/4/20 am sign off and appointment of stakeholders

2 – 21/4/20 pm issue SOP and introduction training DHSC Supply Chain

3 – 22/4/20 entry of all contracts and PO's - may need a shared resource with Uniserve to get up to

date

4 – 23/4/20 training FCO

5 – 24/4/20 implement vendor management

6 – 25/4/20 implement Clipper ASN's

7 – Next week implement finance and forecasting".

[JAR/61 - INQ000528505] [JAR/56 - INQ000528501]

106. At 16.03 on 20 April 2020, Oliver Cuerden of the DHSC, emailed Hannah Stout and me, forwarding to us an email from Sachin Joshi, Procurement Category Manager (ICT & Digital), Commercial Directorate, DHSC, in which it was observed that, whilst the value was relatively low, there existed Government Digital Service Spend Control approvals process that kicked in at £0 before a procurement could even begin **[JAR/51 - INQ000561925]**. This control was not to do with procurement, as opposed to commercial policy and concerned spend controls over sign off.

107. At 21.09 on the same date, Jo Newman emailed me to ask whether I had organised a demonstration for the next day as Hannah Stout was concerned that they

needed to review and approve before a contract was in place. I replied to confirm that a call was in place for 11.00am the next day, which Hannah Stout and others had been invited to. I indicated that I had seen an email about getting Government Digital Service approvals but was really keen that we could just go ahead and worry about that afterwards. **[JAR/62 - INQ000528498]**. This observation was not about procurement but about the spend control.

108. I note from **[JAR/61 - INQ000528505]** that Iain Liddell forwarded his email of 20 April 2020 at 17.16 to Chris Hall on 21 April 2020 and that Iain Liddell asked Chris Hall whether there had been any feedback to the “*cost plus procurement proposal*” which he had sent him.

109. On 21 April 2020, Iain Liddell of Uniserve demonstrated the One World software at a meeting that was attended by myself, other procurement colleagues from DHSC and representatives from the Ministry of Defence. After the demonstration, my initial impression of the One World system was extremely positive. It was certainly much better than what was in place when I first joined the PPE Buy Cell which, as I have previously stated, was a rudimentary and inefficient means of tracking a high volume of contracts moving through the supply chain.

110. I am not aware that any minutes of this meeting exist.

111. At 13.52 on 21 April 2020, Steven Mitchell emailed me, stating:

“Spoke with Jin and Alan, both are onboard with the solution and keen to get this visibility.

I'm working to understand the SCCL existing supply chain and how we either get a feed into the Uniserve OneWorld process or something similar from Unipart. Will advise shortly.” **[JAR/63 - INQ000528508]**

112. At 14.21 on 21 April 2020, I replied, copying in Nick Parkes, and indicated that I had spoken with Rob White, DHSC Finance Lead and that he was on board and speaking with his colleagues to work out how to progress. I asked Nick Parkes:

“[C]an you advise anything about how we've contracted with Uniserve for the logistics support they are providing? We need to square off data security and conflict of interest questions that have inevitably been raised. If there is any sort of NDS [sic] that they've signed or if there are robust data security provisions in their current contract then that may be good enough.” **[JAR/63 - INQ000528508]**

113. My reference to conflict of interest questions was to those conflict checks with those in government which are standard procedure when a procurement is being undertaken. It was not a reference to a conflict of interest between Uniserve providing the One World system and also supplying PPE or suggesting that there was one.

114. In response to this, Nick Parkes stated:

“... there aren’t any as they were contracted to provide airfreight and customs brokerage only, they have a standard supplier set up only. They will need to sign an NDA etc, we can contract One World as a separate entity and the same for Uniserve, however that does not remove the privilege of knowing what our suppliers charge and them supplying the same! I am sure GLD could write a contract very quickly to ensure they are locked down”. [JAR/63 - INQ000528508]

115. I am uncertain as to what Nick Parkes meant by “there aren’t any”, but he may have been referring to an absence of NDAs or data security provisions in an existing contract and his reference to a contract locking them down may have related to data security. I do not recall One World being a separate legal entity but was subsequently informed that it was by Iain Liddell [JAR/64 - INQ000562769].

116. When, on the same date, I queried in an email in reply why it was that we would need to contract for One World separately, Nick Parkes responded:

“There is a conflict of interest in the fact (unknown to me) Uniserve also supply UKG with PPE, they therefore have all prices and data of all PPE suppliers through the visibility of contracts being inserted to One World. You couldn’t write this stuff could you?” [JAR/63 - INQ000528508]

117. In this email, Nick Parkes appears to have been using ‘conflict of interest’ in context of a procurement issue; as the supplier of software which would be populated with pricing from other suppliers, they may have access to the details of contracts and pricing of competitors. Whilst there was a perceived conflict of interest, I do not know the extent to which Nick Parkes did a thorough exploration of this. I was however aware that Edward James of DHSC picked up this issue as set out in paragraph 120 below. I replied to this email of Nick’s [JAR/65 - INQ000562768].

118. On 22 April 2020, I forwarded the earlier email chain from 9 to 14 April 2020, together with the One World link, to Janette Gibbs, who was based in the Complex

Transactions Team but whose role I do not now recall, with the observation “Am looking to get this set up imminently” [JAR/66 - INQ000561922].

119. On 23 April 2020 at 12.07, I was copied into an email from Jin Sahota, Chief Executive Officer, Supply Chain Coordination Limited, Management Function of the NHS Supply Chain, which, among other things, identified some difficulties that were arising including PPE shipments arriving in Daventry without appropriate identification and an unclear supply pipeline visibility at the right product granular level. One of the suggestions in this e-mail, which is assigned to me is “*Implement the Uniserve OneWorld tracking system for new supply to provide full track and trace capability at product / supplier level. [Action: J Arrowsmith / 24/4]*” [JAR/67 - INQ000528513] [JAR/68 - INQ000528517]

120. Part of my job was to arrange for a contract to be drawn up and to undertake the practical steps to onboard the One World system. To that end, while I was not responsible for the drafting the One World contract (as this was undertaken by the Government Legal Department), I forwarded information that Iain Liddell provided to Edward James [JAR/64 - INQ000562769] and was copied in on e-mail exchanges between Iain Liddell and Edward James at DHSC on 23 April 2020, as Uniserve and DHSC negotiated on the precise terms of the One World contract. [JAR/69 - INQ000562770] JAR/64 [INQ000562769].

121. As can be seen from the final version of the One World contract [JAR/70 - INQ000563207] which was executed on 24 April 2020, clause 7 generally makes provision for confidentiality, and clauses 7.7 – 7.10 (as inserted at the request of DHSC) specifically provide for the type of safeguards that referred to in my email of 22 May 2020 (at paragraphs 119 and 120 above) against the misuse of Competitively Sensitive Information (though these were obviously not drafted by me and I would defer to people with legal expertise as to their legal effect). In particular, clause 7.9.1 required that the data would not be used under any circumstances be used to gain a competitive advantage over any competitor or third party, and the following subclauses set out more detailed provisions for the control of such data.

122. I understood therefore that a contract between Uniserve and DHSC for the supply of the One World system was signed by Iain Liddell on 24 April 2024. At 10.56 on that date I emailed Chris Hall, Janette Gibbs and Jin Sahota stating:

"By way of update - we have now negotiated terms and signed the contract with Uniserve for provision of the One World system. In terms of next steps, DHSC finance will provide all contract and PO documentation issued to date so that they can start populating the system. Jin - can you please provide me a contact in SCCL to work with for provision of your data?

I'll also liaise with Uniserve to firm up an implementation plan for roll out." [JAR/71 - INQ000528511]

123. Uniserve produced a 'One World Project Plan & Scope of Works', 'DHSC Emergency PPE Implementation' document dated 24 April 2020 in which they set out what they would provide together with a 'Master Contract'. This document pertained to One World only and not to the supply of PPE [JAR/72 - INQ000561935].

124. In section 1 of the document, "Business Background & Project Overview", Uniserve stated as follows:

"The UK Government urgently requires personal protection equipment (PPE) to be procured and delivered to the front-line healthcare workers in efforts to support the battle of COVID-19. Currently, there is no one data standard or system to underpin the various Government departments and consultants.

Consequently, there is a significant lack of transparency about the status of products and vendors within the supply chain, thus impacting planning efforts upstream and downstream. The systems in place today include excel spreadsheets, PDF, word documents, the Mendix systems, the DHSC financials system, freight management systems and DC warehouse management systems. Often, the data is inaccurate and out of date by the time they are shared and do not use the same references to join these sources together. This is causing many issues downstream in the supply chain and therefore not running as efficiently as required.

One World has been appointed to manage all the data people and processes.

One World manages the supply chain from raising the purchase order (PO), to delivery of products. The One World GTM project team have been mobilised urgently to deliver the operating procedures, most of which pre-exist in the core functionality of One World while other requirements are being fulfilled through extending functionality."

125. In section 2 of that document, "Project Objectives", Uniserve stated as follows:

"The objectives are:

- Optimise end to end supply chain processes to reduce manual data entry, reduce duplication and therefore improve quality of information;
- To provide information to all relevant supply chain parties and work from one version of the truth;
- Provide more accurate information flows to enhance decision making to avoid unnecessary costs and delays;
- To utilise resource through ensuring that parties stick to their commitments and obligations through process accountability;
- To share as much information through system integration as much as possible to avoid manual error, where urgency permits;
- To provide data to support analytics to improve both supply and demand models being developed by other parties involved in this project;
- To forecast arrivals into the distribution centre (DC);
- To forecast payments and financial commitments;
- To manage vendors and contract."

126. It was agreed that One World would be deployed as a means of tracking PPE orders throughout the supply chain.

127. Steven Mitchell replied to the email from Jin Sahota of 23 April 2020 at 12.07, on 28 April 2020 at 08.33, copying me in:

"Jonathan and I are making progress on Action 1 relating to the introduction of the OneWorld tracking tool. The Uniserve team have been working diligently to upload all contract, PO and invoice data received, however the quality of the data is proving to be problematic, I'll share examples and issues separately.

I was in Daventry yesterday and the quarantined stock continues to grow, we are now up to 18M units, the root cause often being the team simply have no clear identification or link to a contract / PO that enables them to book in and issue to the front line...

We are working on providing a "must have" data list for all contracts / PO's to improve the process flow and will issue this in the next 48 hrs to the buying teams. I also think it would be prudent to have any new supplier express ship (i.e. UPS or DHL) a "golden" sample of their product (prior to batch production completion / shipment) to Daventry for evaluation by the Clipper / HSE / OPSS / MHRA teams to enable proactive quality assessment and WMS data preparation. I'm not sure who could give this instruction but would certainly be beneficial in these challenging times..." [JAR/67 - INQ000528513] [JAR/68 - INQ000528517]

128. He added, in an email to Chris Hall at 10.53 on the same date:

"I appreciate the recommended instruction below, "no PO / no shipment", however the issues are not that there is no contract or PO but more that the description of the product ordered is inadequate (i.e. gown - but not type or size or clarity on specification) to enable identification upon receipt in Daventry. There are multiple systems involved that are not connected and information flow is very spreadsheet driven, hence the benefit of the OneWorld solution to provide end-to-end visibility and connected data is of paramount importance. We can provide a simple excel which identifies "must have" data attributes for items that should be included in the product description at point of contract / PO.

I also think getting samples from Chinese suppliers (or any new supplier) makes sense. We have daily flights coming from China and these could be consolidated by Uniserve and delivered to the Daventry warehouse for evaluation prior to any bulk shipments."

[JAR/67 - INQ000528513] [JAR/68 - INQ000528517]

129. On 29 April 2020 I emailed Michael Beard, Darren Blackburn and Operations Lead in the following terms:

"As you are most likely aware, we are working with Uniserve to implement the One World supply chain management. This will provide much needed end to end visibility and status of PPE across all buying workstreams, from the point of order up until delivery and receipt of the items at the Daventry warehouse.

Uniserve is currently populating the system with details of all orders placed thus far including contract documents, POs and invoices received to date. For various reasons, however, there are gaps within the data that we've been able to provide to them. It is

for this reason that Uniserve will be contacting all suppliers and asking them to verify information (where we don't have it) about the orders placed with them."

Uniserve provided a draft letter for that purpose.

**[JAR/73 - INQ000528516] [JAR/74 - INQ000528518] [JAR/75 - INQ000528519]
[JAR/76 - INQ000528520]**

130. On 30 April 2020, I requested that access to Mendix be provided to Iain and Hannah Liddell so that they could locate supplier contact details and access relevant technical documents **[JAR/77 - INQ000528521]**

131. On 3 May 2020, Hannah Liddell suggested a list of people who Uniserve felt needed to be brought together on MS Teams based on who they had been speaking to or who had requested access to the One World system **[JAR/78 - INQ000528526]**.

132. At 19.20 on the same date, ahead of a briefing meeting, I provided Hannah Stout with an overview of key activities conducted by Uniserve since they had started work in earnest on One World **[JAR/79 - INQ000528525]**.

133. A core working group worked on getting the system live, with licences to be given out and training given **[JAR/80 - INQ000528528]**. On 7th May 2020, One World GTM Freight Training was provided to staff, including Ministry of Defence staff **[JAR/81 - INQ000528530]**.

134. One World went live on 08 May 2020 and the DHSC identified that it was being used for 2 purposes:

- to track all deliveries to Clipper going forward;
- to track all freight being handled by the On Time -> Uniserve shipping route as arranged by the DHSC freight desk **[JAR/82 - INQ000528535] [JAR/83 - INQ000528532]**.

135. The One World offer was not processed through the HPL. The HPL was for PPE only. I was the person who received the One World lead, progressed it and presented it to the DHSC for that contract to be put in place and a lot of my work in the early days was securing the One World software. Chris Hall had oversight, not Jo Newman.

136. As outlined above, my perception of the One World system was positive. It seemed that it would provide a solution, whereby orders of PPE could be logged and their status tracked throughout the supply chain. The ability to log and track orders was lacking at the time. There were no effective systems and processes to understand what was happening with those orders.

137. I was not aware of any other company who could provide such a piece of software or which was offering to do so. I was not made aware of any others. Uniserve did not say that they were the only possible providers, but this was their solution. There was a pre-existing relationship with Uniserve, who were providing logistics services to the Government, although I had not seen any logistics contract at the time. I am not aware, and do not believe, that there were any discussions that took place about advertising or putting out an offer to tender for a similar piece of software from alternative providers. The context was that the offer looked as if it may work, this was a health emergency and we did not have time to investigate alternatives as opposed to progressing this one, which we had to do given the imperatives. There was a general understanding, the basis of which I do not recall other than that it emanated from discussions with colleagues and may have emanated from the PPN, that we were relying on the direct award provisions contained in regulation 32 of the Public Contracts Regulations 2015 ('the 2015 Regulations').

138. There was an urgent need to implement some type of software that would give us a global view of products moving throughout the supply chain.

139. With visibility of the orders through the One World system, Uniserve could see what orders were being placed, including all detail of the orders placed, save that they were prevented from doing so by way of the contract terms negotiated between DHSC and One World as set out at paragraph 121 above. Ordinarily that would have been a red flag in terms of potential procurement but, in the context of the time, we could not get enough PPE and it was very much market driven. As far as I was aware, we were not running competitive procurements for PPE. If we had known how much PPE was required, it would have been more feasible to run procurements for PPE and we would know that we only needed a certain amount of stock. The context at this time, however, was that we were open to all offers.

140. However, I should note that on 22 May 2020, I was forwarded correspondence from Eileen Rogausch from the Covid-19 PPE for NHS Closing Team in the GCF, in which she stated that one supplier had raised concerns over providing copies of

invoices and purchase orders with DHSC to Uniserve. This supplier was requesting sight of any NDA that Uniserve may have entered into and, if there was none, to advise what protections are offered to DHSC suppliers, given that Uniserve, at that time, also provided PPE goods.

141. I responded to this correspondence on 22 May 2020 stating that, while we would not ever share an NDA between 2 parties, the suppliers could be assured that Uniserve is contracted to DHSC to provide the One World system and that the contract with One World, which I discuss further below, contained stringent data security provisions. I also state that the One World contract contains provisions which restrict Uniserve to only using competitively sensitive information for the purpose of tracking items through the supply chain [JAR/84 - INQ000562767].

142. The DHSC said they wanted the One World system. They had sign off on the contract and responsibility for any regulatory compliance as the contracting party. The signatory for the DHSC was Edward James. I think he signed the majority of contracts for PPE and all contracts for DHSC. We did not, as we did not have delegated authority to do so. I do not know how the DHSC went about ensuring regulatory compliance but, ultimately, it was for the DHSC to satisfy themselves that the 2015 Regulations were complied with.

143. My perception was that Uniserve wanted to position themselves as a company which was being very helpful. I am unable to recall the value of the One World contract but Uniserve provided it at very low cost at the outset.

144. We had been unable to understand the status of the orders as quickly as we would have wanted and that, ultimately, affected demand planning. Latterly, quite a large team from Ministry of Defence worked with the PPE Buy Cell and with Dr Emily Lawson to plan how much PPE was needed and to model what they needed, to understand what was ordered, what was delivered in what quantities and to where it was delivered and the feed for that data came from the One World system in the main.

145. When we were first considering One World, Nick Parkes' view, as I recall it, was that he wanted access to the system, but did not want Uniserve people to operate it at that stage although, as I set out below, the approach of the PPE Buy Cell changed at a later point in time.

One World Inputting / Managed Service

146. On 01 May 2020, 7 days before One World went live, and following a discussion between us, Iain Liddell had emailed me to say that Uniserve could support the contract management team “*with two experienced GTM people*” and that more could be allocated if required. He stated that they were extremely well qualified to manage vendors, the supply chain, One World GTM (Global Trade Management), supply contract reporting and guidance/training to the DHSC Contract Management team and added that they also worked closely with the freighter team and origin partners, “*so the full end to end view and control*” [JAR/85 - INQ000528522].

147. Iain Liddell listed the tasks and matters which he could see them managing, including:

- “1 – *Vender Verification and helping/chasing vendors*
- 2 – *Scheduling and managing availability and shipping dates*
- 3 – *Scheduling and managing payment dates*
- 4 – *Implementing SOP’s and vendor compliance/QC processes*
- 5 – *Managing vendors supply chain documentation and requirements*
- 6 – *Managing and validating data integrity from the whole of the supply chain in One World*
- 7 – *Central point of communications for supply chain updates and reporting.*”

[JAR/85 - INQ000528522]

148. Iain Liddell stated: “*the GTM Managers will build a great lines (sic) of communication, reporting, standard operating procedure, service level reporting and ensure that everyone is coordinated*”. He identified a daily charge as Compliance Manager, plus any expenses and a 10% management fee [JAR/85 - INQ000528522].

149. I forwarded that email to Chris Hall and Andy Wood on the same day, observing that I thought it would be incredibly helpful and that we could get this resource in with a view to ramping down as the contract management team ramped up and became more established [JAR/85 - INQ000528522].

150. The One World system appeared to be a good system and the reaction to it among colleagues was almost immediately positive. However, the effectiveness of

One World depended on the quality of the data and, at that point, we had poor data so, ultimately, could not get the best out of the system.

151. There were teething difficulties at the data / inputting end. The transcribing of data into the system was not uniform and the formatting of contracts was not consistent. In the run up to the system going live, Iain Liddell identified the need for DHSC to send the contracts / invoices etc. and that was not happening. A problem was also identified that orders which were being tracked through One World seemed to be going to other agencies [JAR/86 - INQ000528523] [JAR/83 - INQ000528532].

152. In an email to me and Steven Mitchell of 4 May 2020 at 14.19, Iain Liddell listed a range of problems and stated what he considered needed to be done [JAR/87 - INQ000528527].

153. The problem was that we did not have the personnel capacity for the tasks. Uniserve's proposition was that they would provide a managed service; they would identify the contracts and populate the system. Some people from the Cabinet Office and DHSC were given access alongside those from Uniserve.

154. At 14.30 on 08 May 2020, following a conversation with Iain Liddell I emailed him to ask the following:

“Further to our conversation earlier, can you provide a short written proposal (including indicative costs) for the proposed QC operation in China.”

[JAR/88 - INQ000561936] [JAR/89 - INQ000561920] [JAR/90 - INQ000528534]

155. Iain Liddell replied the same day, setting out the process, output and indicative costs and stating:

“Further to our discussion earlier today we can mobilise the QC teams very quickly and I have already indicated this could start as early as Monday 11/5/20.

We do a lot of QC work with various contractors and have a global reach but specifically regarding China we have professional QC contractors on the ground in all manufacturing regions so rapid inspection will not be a problem. They are all familiar with PPE so we are confident that this solution is the right solution.”

[JAR/91 - INQ000561934] [JAR/88 - INQ000561936] [JAR/89 - INQ000561920]

[JAR/92 - INQ000563206]

156. I forwarded that reply to Andy Wood, Michael Jordon (FCO, DIT and China Lead – PPE, Complex Transactions Team) and Chris Hall the same day, enquiring as to whether they wished to follow it up [JAR/91 - INQ000561934] [JAR/89 - INQ000561920].

157. Michael Jordon confirmed that he would follow it up and stated that they were speaking to a couple of other providers / experts but that this would help them to do a very quick value for money exercise, to which I replied, *“The other thing to point out is that this solution would integrate seamlessly into the logistics and One World set up being provided by Uniserve. Iain would be able to explain further”* [JAR/88 - INQ000561936] [JAR/89 - INQ000561920].

158. I also forwarded the proposal to Jo Gander (NHS Supply Chain), Geoffrey Brown at the Department for Business, Energy & Industrial Strategy ('BEIS'). Jo Gander enquired as to whether I had discussed this with the MHRA given previous discussions regarding the complexity of the China situation, and I explained that I had not but would be keen to understand the decision making process around this and timeframes [JAR/88 - INQ000561936] [JAR/89 - INQ000561920].

159. The quality control provision in China and the provision of managed services relating to One World are likely to have reflected an incremental growth of the service provided by Uniserve under the One World contract; I am not aware that there was any separate contract.

160. On 3 June 2020, Iain Liddell wrote to Steven Mitchell and me in the following terms:

“We have put together the attached showing how many people we have deployed on the DHSC across One World and Freight Management, you may be surprised to see that we have 28 Teams and over 1400 people working on this daily.

I would appreciate your feedback and I don’t think people quite realise what we are doing and how important it is to keep the whole supply chain working.”

[JAR/93 - INQ000528548]

161. I forwarded that email to Chris Hall and Andy Wood, stating:

“FYI below - I think Iain is looking for some recognition about the important role that Uniserve is playing in the PPE supply chain.

Chris, I know that you had some early conversations with him, but I wonder whether you'd be able to find some time for a conversation later this week? I'd present it as an opportunity for Iain to provide yourself and Andy with some insight regarding some of the issues he's seeing and have a discussion about how we could tackle them from his perspective?"

[JAR/93 - INQ000528548]

162. On 7 June 2020, Uniserve provided proposals for the supply of 3M Aura respirator masks and arrangements were made to discuss this with the Rapid Response Team **[JAR/94 - INQ000528550]** **[JAR/95 - INQ000561937]**

163. On 12 June 2020, following correspondence on the issue, Chris Hall emailed me and others to introduce Michael Keegan, Crown Representative for British Aerospace who would help in deepening and focusing our relationship with Uniserve going forward. Chris Hall explained that Michael would be working at CEO level, with Iain Liddell, *"to help us be a better customer for Uniserve and by extension help them be a strategic partner"*, adding:

"I've given him an introductory briefing on what Uniserve do with us and for us, and how this might change in the future. Michael would be grateful for time with you to get your perspectives and understand the messages that you would like him to give to Iain - and in return he will be in a position to reflect Uniserve's perspectives back to us, as he is not in the line."

[JAR/96 - INQ000528549] **[JAR/97 - INQ000528555]**

164. On 17 June 2020 at 10.38 Iain Liddell wrote to Edward James, copying in myself and others, expressing concerns about a letter sent to Hannah Liddell on 16 June 2020 in which Edward James had raised his surprise about receiving Uniserve invoices for additional resource costs. In this e-mail Iain Liddell set out all of the work that he claimed had been undertaken by Uniserve asserting further that *"[Y]ou would have hopefully seen the resource diagram that were [sic] set out a few weeks ago (14 OW teams 52 people, as attached) this should give you a clear picture of what the DHSC are achieving through One World Limited and Uniserve albeit not as per the simple scope of works for One World GTM PO and supply chain management platform, services have extended way beyond this. Had we not then I am sure the PPE supply chain would have become unmanageable"*.

165. I forwarded that email to Chris Hall and others at 11.52 on the same date, stating:

"As discussed yesterday I believe that in difficult circumstances over the past 2 months both parties have acted in good faith and should continue to do so.

Uniserve has had to commit significantly more resource to the OneWorld project than originally envisaged and this is not surprising given the state of affairs in mid April. Had we known at the outset what we know now, it would have been obvious that the Uniserve resource contained in the original contract fee (three junior data admin resource at I&S day) was completely inadequate.

Whilst internal process regards approval of costs has not been strictly followed, additional resource costs have been approved by various people, myself included in response to multiple demands in a fast moving, pressurised and uncertain environment.

As we move out of crisis mode, there is an opportunity to put some more rigorous project infrastructure around the OneWorld project e.g. clear requirements, milestones, reporting and dependencies. The contract should also be re-scoped and clarified. This should be done ASAP.

In the meantime, the OneWorld costs to date (I believe c£138k) should be paid and DHSC should provide formal confirmation regards what Uniserve resource under the OneWorld contract is approved and what is not approved."

[JAR/100 - INQ000561941]

Further exchanges of emails between Iain Liddell and Edward James followed and, at 22.57 on 17 June 2020, I emailed Edward James outlining my view that, as the One World contract was put in place very quickly, as Cabinet Office officials had been making many demands from Uniserve employees and as those employees had 'stepped up to the task', the costs incurred by Uniserve had been properly incurred. I did however clarify that as we 'moved out of crisis mode', there was "an opportunity to put some more rigorous project infrastructure around the OneWorld project e.g. clearer requirements and milestones, governance and approvals process, reporting and dependencies. The team is going to propose reshaping the contract to make it more of an output based one with clearer requirements, SLAs and dependencies. This may

include an element of fixed fee for greater cost certainty moving forward.” [JAR/98 -

INQ000563205

166. On 18 June 2020 at 09.41, Chris Hall wrote to Michael Keegan, stating:

“This might be your first job as Crown Rep - Iain has given 20 people working on this topic the day off (essentially downed tools)

He'd like to speak to you - are you available at all today”

[JAR/101 - INQ000561940]

167. At 10.15 on the same date, I emailed Chris Hall and Michael Keegan in the following terms:

“Michael, I'll introduce you now via email.

In my view, Iain very much thinks he's acted in good faith (and I would agree) in providing resources - and they have achieved a lot in the space of a couple of months. DHSC (finance) is taking issue that the resources have not been signed off per the correct internal processes – but this as a result of numerous officials and others asking Uniserve to undertake work in the midst of an emergency (without having due regard for the correct process - and indeed, many will have been unaware of it in any case).

I think this can be settled down quickly. The OneWorld contract was put together in a hurry and is essentially a T&M arrangement. The value of the original contract was inadequate and Uniserve has had to assign a lot more resources to it than originally envisaged. There is now, understandably, a desire within DHSC to rescope the contract and clarify requirement, deliverables, responsibilities etc.”

[JAR/101 - INQ000561940]

168. On 19 June 2020 at 16.53, following further emails, including an email from Michael Keegan at 15.09 on the same date in which he set out the outcome of his discussion with Iain Liddell, I emailed Edward James, stating:

“The current agreement ('OneWorld Master Service Agreement') will remain in place. This provides for access to the OneWorld platform plus the cost of 3 Uniserve FTE data administrators. The agreement expires at the end of April 2021. It may need to be varied slightly to allow for additional licence costs for 'Domo' which is the reporting/BI tool that enables us to interrogate OneWorld in a more effective manner.

We should put in place a new agreement with Uniserve (probably pursuant to reg 72 tbc) for the additional services that we now know that we require from them such as integration with other software systems (e.g. Clipper WMS) and 'vendor verification.' The agreement should go out to the end of April 2021 and contain a clear scope of works plus a ratecard to enable us to flex resource as required."

[JAR/102 - INQ000528558] [JAR/98 - INQ000563205] [JAR/99 - INQ000561939]

169. Edward James replied at 21.03 on the same date:

"Yes that aligns with our conversation. Just for clarity, the current contract will be extended under Regulation 72 and the new contract let under Regulation 32."

[JAR/98 - INQ000563205] [JAR/99 - INQ000561939]

PPE: The Approach from Uniserve and the Referral of Uniserve into the HPL

170. On Friday 08 May 2020, a "One World Steering Group Meeting" was held **[JAR/103 - INQ000528536]**. On this date, Iain Liddell informed me that Uniserve was in a position to procure items of PPE directly. My understanding from previous conversations with colleagues was that Uniserve were already providing PPE to the UK Government.

171. As outlined above, the onboarding of the One World system saw me in regular contact with Iain Liddell, both by e-mail and by phone. He had an existing relationship with me and knew me as someone in the PPE Buy Cell. I was looking to expedite supplies and saw him as a reliable source.

172. On 8 May 2020 at 14.27, I emailed John Brannan, Commercial Specialist with the Complex Transactions Team, under the subject heading "Uniserve - new 'VIP' customer", copying in Chris Hall and Andy Wood, stating:

"I've spoken with Chris (cc'd) and we've agreed that Iain Liddell (CEO and owner of uniserve) should be coming through our 'VIP' route. He's sourced a load of PPE for us to date - as well as providing the logistics and freight solution and the One World supply chain solution.

He's confident that with his network in China (which is extensive and well established) he can source a high volume of PPE at reasonable prices for us. He's become

frustrated at the pace of the 'normal' new buy process and seems to be stuck in the opportunities queue.

Can you confirm what needs to be done in order for me to direct him to you and your team?

If we tell him what we need and in what volumes he'll get on the case."

[JAR/104 - INQ000528533] [JAR/105 - INQ000528538]

173. I do not recall any specific detail of the conversation which I had had with Chris Hall.

174. John Brannan replied to that email at 10.57 on 9 May 2020, stating:

"The best way to deal with this is for him to send through the information to the priority mail box copied above. That way we can either make sure that it is picked up by the VIP team (one of the caseworkers who are used to dealing with VIP cases) or alternatively the RRT.

While I don't want to open the floodgates, as I'm sure there are a lot in the system where individuals / organisations are becoming frustrated with the pace things are moving at, we can treat this one as an exception and as an escalation so that we can progress it as such."

[JAR/105 - INQ000528538] [JAR/106 - INQ000528562]

175. The mail box to which John Brannan referred was the Covid PPE Priority Appraisals Mailbox, which I have identified above.

176. I replied at 11.00, copying in Chris Hall, Andy Wood and the Covid PPE Priority Appraisals Mailbox, to say: *"Thanks John. I certainly won't be referring any more"* **[JAR/105 - INQ000528538]**.

177. John Brannan replied on the same date at 11.12:

"Thanks Jonathan. I wasn't suggesting you would but I didn't want others in the broader team or even outside that to start thinking that this is an answer to any problems they are having with the system and we get swamped." **[JAR/107 - INQ000528537]**

178. I note that Chris Hall emailed John Brannon later the same day stating:

"This is our logistics partner and an existing supplier in some volume. Might be worth Sali putting this tx through the RRT

Not sure where it is and who owns it but worth pursuing". [JAR/107 - INQ000528537]

179. The RRT was the Rapid Response Team.

180. Having made enquiries on 8 May 2020 as to what items were high priority at the time, I received confirmation of this on 10 May 2020 at 15.30 [JAR/108 - **INQ000561919**]

181. I followed up the abovementioned conversation with Iain Liddell with an e-mail at 15.42 on 10 May 2020 where I stated that the 'in-demand' PPE items at that time were Aprons, Gloves, Eye Protectors (google/visors), Alcohol Hand Sanitiser, Gowns (sterile only) and Disinfectant wipes. In this e-mail I said "*If you can let me know what you think you can source for the above, timeframes, volumes and price points I'll get it fast tracked assuming it's sufficiently large volume*" and added that I was conscious that I needed to comeback to Iain on the China QC proposal [JAR/109 - **INQ000528539**] [JAR/110 - **INQ000528540**].

182. Iain Liddell responded to this at 15.50, stating that Uniserve could provide these items of PPE and had been focusing on them, adding that the approval process had been "*taking weeks*". He suggested that **Operations Lead** believed he was "*in charge of the fast track high volume unit*" and had told Iain Liddell, that it would go through him in any event. Iain Liddell suggested that this had not given him much confidence knowing how "*painful*" the process was. Iain Liddell added that **Operations Lead** had said that the Mendix system was so difficult to work with and that he found it frustrating to track anything. He concluded: "*Anything you can do on this would be hugely appreciated, I will send you a supplier of T11R masks I have just sent Iain, as we can get 5mill a week and they are high quality.*" [JAR/110 - **INQ000528540**].

183. Iain Liddell had sent an email to **Operations Lead** and others at 15.37 on 10 May 2020 requesting that an offer of INTCO masks be "*put through the fast track and high volume approval process*". This was forwarded to me by Iain Liddell at 15.59 on the same date. [JAR/14 - **INQ000528543**], [JAR/111 - **INQ000528546**].

184. Shortly prior to this, I said to Iain Liddell in an email sent at 15.56 "*I'd try to bypass him - but I did speak to him again and he said he'd be getting a caseworker to focus on this from Monday. Appreciate how frustrating it is - especially since I've seen*

some of these offers turned around and POs placed in 24-48 hours". [JAR/110 - INQ000528540].

185. At 16.14 on 10 May 2020, I emailed Nick Dawson (NHS England & NHS Improvement) to flag that I had been talking regularly to the CEO of Uniserve and stating:

"He has an established network in China and is confident of being able to provide high volumes of PPE at a good price point (e.g. 12m aprons per week for next 10 weeks) but is frustrated at the amount of time it's taking to pass through the opportunities process. Clearly freight would not be an issue. They have supplied items in the past few weeks - but I feel at the mo that we're missing a trick by not getting them to supply more strategically through the VIP route. I have flagged this but if you could too it may be helpful.". [JAR/112 - INQ000528541]

186. In a further email sent to Iain Liddell at 16.33 on the same date, I indicated that I was speaking to someone in Dr Emily Lawson's team [JAR/110 - INQ000528540].

187. By email sent at 16.36 on the same date, I asked Iain Liddell how many INTCO masks he was able to obtain, to which he replied, at 17.14, "*5 million per week, maybe more*" [JAR/111 - INQ000528546].

188. The following morning, 11 May 2020 at 11.34, Iain Liddell emailed me to enquire whether he could speak with anyone else on approvals as he had an opportunity of 60 million nitrile gloves available the next week and needed to speak with someone who could approve quickly [JAR/111 - INQ000528546].

189. At 12.24 on 11 May 2020, I forwarded that email to the Covid PPE Priority Appraisals Mailbox, stating that this was a reputable supplier and that I had agreed with Chris Hall that this supplier should be prioritised. I asked that someone contact them to take this forward and confirm to me that this had been done [JAR/111 - INQ000528546] [JAR/14 - INQ000528543] [JAR/113 - INQ000528542].

190. I note that, at 14.18 on that date an enquiry was made "*On Behalf Of Covid PPE Priority Appraisals Mailbox*" to Wendy Burden: "*Is this one RRT would take? (Sorry - I am not as adept as ... at what goes where)*". I note, further, that Wendy Burden replied at 15.04:

"Interesting one! We already have several contracts with Uniserve, so should be pretty straightforward as long as they meet the spec.

I'll take it and contact him now, then let you know whether it should go RRT or actually following discussion with Max today we can get it through quicker through the normal route!" [JAR/114 - INQ000528544]

191. At 16.55 on the same date, I emailed Darren Blackburn, forwarding my email of 12.24 and stating: *"is there anything you can do about this? He seems to be getting no joy from the opportunities team."* Darren Blackburn replied at 22.01: *"See if you can set up time for me and him to talk on Wednesday? I need the gloves for my targets!!!"* [JAR/111 - INQ000528546] [JAR/115 - INQ000528545].

192. I also emailed Darren Blackburn at 09.41 on 16 May 2020 in respect of further correspondence from Iain Liddell concerning *"High volume deals"*, in which I stated: *"FYI - high volumes of gloves, goggles and gowns. Seems to be a bit stuck in the process. Anything you can do to unblock?"* [JAR/116 - INQ000561938]. I do not recall making a separate referral into the HPL.

193. Of those suppliers identified in the published list of offers processed through the HPL, I was only concerned with Uniserve.

194. I am confident that there was no direct contact with me by ministers over Uniserve being referred into the HPL.

195. I have been shown an email chain of 16 March 2020, which pre-dated my joining the PPE Buy Cell and into which I was not copied, in which Sarah Barrett of the Justice and Home Affairs Policy Unit, Prime Minister's Office, introduced Iain Liddell to Steve Oldfield, DHSC as *"... the MD and founder of Uniserve, independent logistics and global trade management provider."*, adding, *"Uniserve have been working with DHSC so far on PPE supplies, but there's definitely a lot more nationally and internationally that they could do to help."*. Within that email chain, Iain Liddell stated to Steve Oldfield: *"We have great resources and capabilities across air, road and sea freight globally as well as a large UK logistics network, plus many other services and facilities, I am sure we can contribute an enormous amount to the supply chain effort getting PPE and any goods to where you need them."* [JAR/117 - INQ000528470]

196. This predated my joining the PPE Buy Cell and I did not see it at the time or, as far as I recall, thereafter.

197. I have also been shown an email chain from 02 April to 08 April 2020, commencing with an email from Iain Liddell of the former date, concerning where he

thought Uniserve were “*with supporting the NHS and DHSC with logistics/supplying PPE to the UK*” and what he believed was needed and could be achieved. I was not copied into the emails in that email chain but it contains a reference to Iain Liddell’s constituency Member of Parliament, a query as to whether an escalation had come from The Rt Hon Penny Mordaunt’s Private Office and a proposal that a check be made with Lord Agnew’s Private Office [JAR/118 - INQ000528473]. I have been shown an email chain over the same period and concerning the same subject matter, into which I was not copied at the time but which has been shown to me, which concluded with an email from Alex Pack, Head of Office and Private Secretary to Lord True, to “*PS Penny Mordaunt Mailbox*” [JAR/119 - INQ000528474].

198. This predated my joining the PPE Buy Cell and I did not see it at the time or, as far as I recall, thereafter.

199. I have also been shown a spreadsheet with a parent date of 14 April 2020, which identifies a “*VIP link*” for Uniserve as Lord Agnew [JAR/120 - INQ000561931]. I did not see this spreadsheet at the time and cannot explain why there is a reference in it to a “*VIP link*” for Uniserve.

200. An email from Chris Hall dated 16 November 2021, into which I was not copied and which postdates my time in the PPE Buy Cell, but which has been shown to me states:

“Uniserve is a really early case and predates the mailbox, so there is no convenient email in there - the spreadsheet shows Jon Arrowsmith (who is not SCS btw) asking for the company to be added to the HPL - likely it was there already!

Before Mendix and the mailbox the HPL team used a series of spreadsheets to coordinate their work. This line for Uniserve comes from a spreadsheet dated 13 April 2020. Lord Agnew's name is in a column titled "VIP link". As you can see from the master spreadsheet the caseworker was . . .” [JAR/121 - INQ000528563]

201. This identifies the fact that I was not a Senior Civil Servant at the time, whereas I am now. This email does not reflect anything which I knew at the time concerning Lord Agnew.

202. It was Uniserve’s offer which I referred into the HPL on 11 May 2020, as opposed to Uniserve as a general supplier of PPE, that is, the referral was of a company with an offer, not simply of a company who could supply generally, but I

believe that an offer would be processed through the HPL and if, when being processed, it appeared that the offer was credible, the supplier would then be dealing with someone and would not have to be re-referred through the HPL for subsequent offers. The situation being one of great urgency, there would be no purpose to be served in putting them back through an administrative loop.

203. The period between Iain Liddell saying on 8 May 2020 that he could assist with PPE and Uniserve being referred into the HPL on 11 May 2020 was 3 days. As I have stated above, I was aware of colleagues making referrals into the HPL, before I received the Uniserve offer. I do not recall thinking at the time that this referral into the HPL was in any way significant. For me it was merely another administrative task which, given the context of the time and the associated pressures, seemed perfectly normal. After this period of time, I have no clear recollection of sending the email to the HPL.

204. During this period, I recall that Iain Liddell became increasingly vocal and critical about the process and it was clear that he was frustrated that his offers were not being processed quickly enough. Having liaised with Iain Liddell extensively regarding the One World project, I had formed the view that Uniserve were a credible partner to work with and the offers that were being made in respect of PPE also seemed credible.

205. I discussed the possibility of Uniserve being referred into the HPL with Chris Hall. I cannot recall any detail of the conversation. I do not believe it was Iain Liddell who first proposed that Uniserve be referred into the HPL. I think he asked me to expedite it rather than use term 'HPL' or 'VIP', although he emailed [Operations Lead] and others at 15.37 on 10 May 2020 requesting that the INTCO mask offer be "*put through the fast track and high volume approval process*".

206. It was decided that Uniserve would be referred into the HPL. While it is the case that this decision was taken, in part, to placate the increasing frustrations of Iain Liddell, it would be unfair to suggest that this was the only reason. As outlined above, in my view (and it was a view that was shared by others, such as Chris Hall), Uniserve had established themselves as a very credible partner who were making credible offers.

207. My role did not involve monitoring conflicts of interest. The conflict of interest point identified by Nick Parkes in respect of the One World offer, to which I have referred above, arose because Uniserve would have visibility of contracts with, and the

pricing of, competitors through the One World system when they already supplied the UK Government with PPE. Uniserve already had a contract to provide logistics and had information about suppliers. As a logistics company, Uniserve had contacts and links with other organisations, manufacturers and factories in China, The Philippines, Thailand etc. and let it be known that they could use their contacts to procure PPE as well as providing logistics support services. They were providing logistics and, at the same time, providing software and, because they had the software, they could see suppliers' pricing. They were providing PPE with that information in the background.

208. The PPE offer was dealt with under regulation 32. The context was that we were operating in a health emergency where there was no time to waste and, at that stage, we could not be selective about where we were sourcing PPE. It seemed as if there was a credible offer and it was progressed, subject to due diligence checks being carried out, some form of negotiation being carried out by the closing team and the terms and conditions being agreed upon.

209. I have been shown a Department of Health and Social Care/NHS E & I Request for deal approval dated 20 May 2020, relating to gowns, within which it is stated: "*Uniserve are currently a strategic supplier of PPE and orders totalling over £1B have been placed so far. Therefore, no additional Due Diligence is necessary.*" I also note that, under the heading "*Special risks and mitigations*", it is stated: "*There is potential for a Conflict of Interests, but this has been mitigated against as an NDA is in place*" [JAR/122 [INQ000563208]]. I was not involved with this. Whilst I referred the Uniserve offer into the HPL, I was not involved in the negotiation or approval of the contract for Uniserve to source that or other PPE, or with regulatory compliance in that contract being entered into.

210. I did not have any sense that Uniserve had made the One World offer with a view to securing contracts for PPE supplies; they were already supplying PPE.

211. I do not now recall any response from Iain Liddell to my referral of the Uniserve offer into the HPL. My communications with him reduced as One World became more embedded and the number of people dealing with the supply chain increased, but there were subsequent developments in respect of One World as I have outlined above.

NCA RO

NCA RO

NCA RO

217. On 26 June 2020 Diane Young, Associate Director with Turner & Townsend, forwarded to me an email from Iain Liddell within which he had provided a report which identified vendors without contact details, non-responsive vendors and vendors which had provided incorrect or incomplete data. NCA RO

NCA RO

“To put the above into perspective, it totals to 84 orders that have essentially stalled within the verification process. That works out to 21% of the total orders which aren’t progressing due to non compliance from the suppliers. Excluding these there are only 10% of orders which are still where they should be within the vendor verification process.” [JAR/128 - INQ000528559]

NCA RO

NCA RO

SECTION D - CONCLUSIONS

220. The principal consideration from the perspective of the work in which I was engaged is the need to have effective systems and processes in place to record, track and monitor the status of orders which are placed. The absence of this at the outset caused problems. At the point at which I left, I do not think a fully effective system was being operated as it had been implemented very quickly in a difficult environment; it might otherwise have been implemented more effectively.

221. The PPE Buy Cell was set up as the PPE supply chain could not cope with the volumes anticipated; the existing system could not cope. An overarching lesson would be to have mitigation in place to surge more quickly, rather than having to implement a new system.

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: 3 February 2025