

Witness Name: Colum Boyle

Statement No.: 1

Exhibits:

Dated: 16 September 2025

UK COVID-19 INQUIRY

WITNESS STATEMENT OF THE DEPARTMENT OF FINANCE

I, Colum Boyle, will say as follows:

1. This witness statement has been drafted with the assistance of colleagues in the Department of Finance (DoF) and with advice from my legal representative in the Departmental Solicitors Office.
2. I took up the post as the temporarily promoted Permanent Secretary of the DoF in May 2021 and left that post in April 2022 to take up the substantive role of Permanent Secretary of the Department for Communities (DfC).
3. During that period, I was the most senior civil servant in the DoF. I served the Finance Minister, and, like all civil servants, I was required, in accordance with the Departments (Northern Ireland) Order 1999 Article 4(1), to act under the supervision and control of the Minister (when in office). I did not, nor was I legally entitled to, give advice to other Ministers or departments or to the Executive. On 11 January 2020 the Assembly was restored, and the First Minister (FM) and deputy First Minister (dFM) took up office. Conor Murphy of Sinn Fein became Finance Minister and remained so during my time as Permanent Secretary.
4. Each Minister oversees a department. The DoF is one of nine Northern Ireland (NI) departments constituted under the Departments Act (Northern Ireland) 2016 and the Departments (Transfer of Functions) Order (Northern Ireland) 2016. Each department is a legal entity in its own right with a specific role and functions.

5. As with all Northern Ireland Civil Service (NICS) Permanent Secretaries, the Head of the Civil Service (HOCS) was my line manager. However, the HOCS could not instruct me to take any particular action, only my Minister could do so. This is for important constitutional reasons unique to Northern Ireland. The role of a Permanent Secretary in Northern Ireland is to serve the Minister of his or her department, not the Executive as a whole. Individual Ministers will of course require their civil servants to implement the agreed policies of the Executive.

6. As a NICS Permanent Secretary, I was a member of the NICS Board, along with the other Permanent Secretaries. The NICS Board provides concerted strategic leadership of the work of the NICS in support of the Executive. It is crucial to achieving the whole-system approach needed to support the development and delivery of the Executive's priorities, through the provision of collective advice and oversight of the organisational change required to optimise delivery and impact. Furthermore, I attended the more regular, informal Permanent Secretary Stocktake (PSS) meetings, chaired by the HOCS and comprising of the Departmental Permanent Secretaries. Unlike NICS Board, PSS does not include Non-Executive Directors and it focuses more on operational oversight and delivery, allowing for more real-time coordination and accountability. In addition, I attended weekly Key Issues meetings with the Finance Minister, which provided a structured forum for me and my senior officials to offer strategic advice on key departmental matters including policy development, programme delivery, governance, and alignment with ministerial priorities. During this intense and fast-moving period, these meetings were extremely useful for providing timely updates and enabling discussions on the scheme to consider any emerging concerns or issues in real time.

7. By virtue of being Permanent Secretary, I was Accounting Officer of the DoF and in my role I had responsibility for ensuring that the DoF functioned effectively in relation to governance, decision making and financial management. I signed the Department's accounts, Annual Report and Governance Statement in accordance with Managing Public Money NI (MPMNI) section 3.3.1. MPMNI (***CB/01 - INQ000099783; CB/02 – INQ000099784***), published by the DoF, sets out the main principles for dealing with resources used by public sector organisations in Northern Ireland.

8. In my role as the DoF Permanent Secretary, I chaired the DoF Departmental Board. The Departmental Board manages the Department within the strategic policies and resources framework set by the Minister. It supports the Permanent Secretary by providing collective leadership and driving accountability of the Department's performance. The Board comprises executive members (i.e. civil servants) and non-executive members (who are from outside the civil service).

9. The overall aim of the DoF is to help the NI Executive secure the most appropriate and effective use of resources and services for the benefit of the community and the delivery of quality, cost effective and efficient public services and administration for the Department's areas of executive responsibility. This includes Finance; Strategic policy; Innovation and Consultancy Services; Construction and Procurement Delivery; the Departmental Solicitor's Office; Internal Audit Shared Services; NICS shared services for personnel, finance, information and communication technology (ICT), training, digital transformation and service related administration costs; NICS Accommodation Services; some grant-in-aid payments; receipt of grants; the administration of centralised funds from UK Treasury; services provided by the NI Statistics and Research Agency (NISRA); Land & Property Services (LPS); grants to district councils; operational and programme costs of the Special European Union Programmes Body (SEUPB); payment and income under the European Union structural fund programmes; operational costs of the Fiscal Council; the sponsorship and provision of secretariats in respect of other independent bodies; other common services; settlement of NICS equal pay claims; expenditure on activities that are required as a result of the United Kingdom's exit from the European Union and contribute to Governmental response to the coronavirus COVID-19 pandemic; severance payments; compensation payments and associated non-cash items.

10. In accordance with sections 1.4.1 and 1.4.2 of MPMNI, the DoF's role is to set the ground rules for the administration of public money and account to the Assembly for doing so. The Assembly looks to the DoF to make sure that departments use their powers only as intended and that revenue is raised, and the resources raised spent, only within agreed limits. The DoF therefore had no direct role in devising a response

to the pandemic, save where it was required to provide appropriate financial governance and to implement financial assistance schemes for affected businesses.

11. In responding to the COVID-19 crisis, the Department's role was to support the Finance Minister and the Executive by providing financial advice, to work collaboratively with all other government departments to ensure the safety, wellbeing and provision of support for the citizens of Northern Ireland, and to implement the Executive's decisions on the allocation of public funding to meet the challenges arising from the pandemic. The Department did not carry out any analysis on the impact of the suspension of power sharing prior to the pandemic nor on its return or the associated economic response.
12. The Department's statutory functions and responsibilities did not change over the course of the pandemic. However, in response to the unprecedented demands faced by society during this period, I understand the Department took on additional pieces of work and stretched its statutory remit. Examples of this included increased numbers of financial exercises such as in-year monitoring rounds, increased drafting of legislation, and repurposing services, such as when Land & Property Services issued grants to businesses in addition to its normal range of services. I would say that, except for the Omicron Hospitality Payment, these examples mostly took place before my move to the Department.

The Department's Relationships

13. The DoF's primary focus during the pandemic, given its role as guardian of Northern Ireland's finances, was with HM Treasury rather than with Ministers in Scotland and Wales. It follows that the DoF's main lines of communication were through established channels with HM Treasury at both ministerial and civil service level. The working relationship was strong, constructive and valued.
14. During the pandemic, the Minister of Finance at the time liaised with his UK Government counterparts, including the Chancellor and Chief Secretary to the HM Treasury, around the implementation of various Covid support schemes to advocate for appropriate levels of support for both businesses and citizens in Northern Ireland.

15. During my time, there was no formal relationship with the Ministers in Scotland and Wales in relation to the economy however I understand that throughout the pandemic, the Minister of Finance had meetings and issued tri-party letters with his counterparts.
16. In regard to relationships with parties external to the Department, I agreed for the Department to commission reports, via the Land & Property Services (LPS), from the Ulster University Economic Policy Centre (UUEPC). The Departmental statement sets out this out in full (paragraph 61) as follows: *The Inquiry may wish to note that during this period, following agreement from the Permanent Secretary, LPS commissioned reports from Ulster University Economic Policy Centre (UUEPC). UUEPC provides independent economic policy analysis and advice to Government. The DoF, the Department for Economy (DfE) and Invest NI provide funding for UUEPC via already established sponsor arrangement alongside other local government and private sector sponsors. (IS/188 – INQ000237283; IS189 – INQ000237284; IS/190 – INQ000237285). This report did not include any reference to Equality Impact assessments.* There are no further relationships with external parties in relation to the economic response.
17. I understand that the Inquiry are interested to know my view on whether I would have benefitted from different or greater engagement with economic experts outside the Executive. I believe that in light of my role, over the Department of Finance, the Department for Economy (DfE) would be better placed to advise regarding economic experts engagement as any view on economic and social impacts regarding Executive decisions would have been a matter for the DfE to communicate as well as providing any analysis, modelling, forecasting or impact assessments relating to the Economy, as the Department responsible for economic development.

Funding Sources

18. In relation to the timing and clarity of additional funding provided by the UK government being adequate, I have considered the information within the DoF statement (paragraph 24 to 35) which sets out detail of His Majesty's Treasury (HMT) funding before I took up post in May 2021 and refers to statements made by the former Minister, Conor Murphy. I agree with the Department's view (paragraph 29) that: *'Should any changes be considered to plan for a future pandemic, the DoF would*

*suggest that HMT could consider the immediate implementation of a funding guarantee similar to the funding guarantee announced by HMT in July 2020. This guarantee provided more certainty around funding and would be helpful in providing a stable context for planning and designing the response to a future pandemic.’ and have nothing further to add regarding this general view. With regard to HM Treasury’s approach to providing NI with certainty and flexibility to respond at pace, as outlined, I joined the Department in May 2021. At this point, the Department had essentially reverted to more normal funding arrangements and as outlined, I agree with the position in the Departmental statement (paragraph 26) which outlines: ‘*Whilst DoF officials were informed of additional COVID allocations on an ongoing basis by HMT the daily discussions with HMT officials (which enabled the Executive to make relevant announcements), the funding from HMT was formally provided through set financial exercises. HMT’s Block Grant Transparency: July 2023 document, published on GOV.UK, outlines the amount allocated for COVID. DoF officials do not consider that HMT was slow in sharing information on financial allocations; in fact, in these earlier stages of the pandemic officials from all Devolved Administrations (DAs) expressed concern around the short notice for both policy announcements and related funding, which is indicative of the pace at which events were developing. This position improved following the HMT announcement of guaranteed funding for DAs (24 July 2020) which provided an additional £3.7 billion of guaranteed funding, on top of the £8.9 billion already received (£12.7 billion for DAs in 2020-21). This guarantee was subsequently revised three further times that financial year (IS/343 – INQ000582231).*’ It is my opinion that the UK Guarantee scheme provided for certainty and flexibility, in relation to the Barnett consequential and provided the ability for NI to make spending decisions at pace. Given when I took up position the Department had reverted to more normal funding arrangements, I cannot offer any views on the limitations and challenges associated with using the Barnett formula during the pandemic.*

19. In Ian Snowden’s M9 witness statement on behalf of the DoF (**CB/03 -INQ000587400**), he states: “*DoF officials do not consider that HMT was slow in sharing information on financial allocations; in fact, in these earlier stages of the pandemic officials from all Devolved Administrations (DAs) expressed concern around the short notice for both policy announcements and related funding, which is indicative of the pace at which events were developing*”. I understand that the Inquiry has asked for my view on this

statement. As I took up post in May 2021, when normal funding arrangements had been reverted to, I can offer no view on this assessment and cannot offer any additional information relating to the matters outlined. Similarly, given when I took up the role, I have no view on the adequacy or timing of funding from Westminster to shape the economic response to the pandemic in NI.

20. I understand the Inquiry would like my view on the sufficiency of funding for the economic response when the Omicron variant emerged. I would highlight that, in the Minister of Finance's statement to the NI Assembly on 3 March 2022, he outlined that £50.2 million would be available to carry forward into 2022-23, indicating that the Executive had sufficient resources for its proposed course of action over the period where the Omicron variant was prevalent. This would have been based on advice from departmental officials.

21. In January 2022 the Finance Ministers in Wales, Scotland and Northern Ireland had a trilateral meeting to discuss a joint request for flexibilities in relation to funding in response to the pandemic. I understand that the purpose of the meeting was to discuss the key points ahead of the quadrilateral meeting and agree which Minister would lead on each agenda item. Specifically, I understand they discussed the His Majesty's Treasury (HMT) Covid funding and associated flexibilities (*INQ000130104*). I had no direct involvement in this meeting, however I was fully aware of the agenda and issues for the subsequent quadrilateral. Advice and briefing for the meeting was provided by officials from the Public Spending Division, which I was copied into. I did not provide any formal advice in addition to this briefing. (*CB/5A – INQ000653970*)

22. I understand that the key concern for the meeting was the additional flexibility around year-end funding. For Northern Ireland, the ability to plan and control the funding received by the Executive is fundamental to good governance. Where arrangements exist that potentially limit or reduce that funding, as in this case of limited carry forward from one year to the next, I believe the Ministers wanted to advocate for further flexibilities. The ability of the Executive to manage larger amounts of additional funding that were provided at the year-end was significantly restricted by the existing arrangements under the HM Treasury's Budget Exchange Scheme. Without this additional end year flexibility, the challenge would be that schemes could not be

designed and implemented without a specific deadline by which funding had to be committed.

23. Following this trilateral meeting, it was confirmed that additional funding would not need to be repaid to HM Treasury. I understand the Department has no record of formal correspondence of this decision by HM Treasury, but officials had ongoing discussions with them. I note that this issue was not flagged in a submission dated 31 January 2022 to the Minister, which I was copied into and so I assume was resolved by this stage (**CB/04 - INQ000648984; CB/05 - INQ000648985**).
24. Whilst this alleviated some of the concerns, specifically regarding repaying funding however there were still concerns around the ability to carry forward funding, for example an increase to the overall percentage limits. Whilst there was agreement on the carry forward of £100 million Barnett relating to a Council Tax rebate, the position in early 2022 led to the Minister making further ad-hoc allocations on 3 March to departments in order to balance the desire to maximise carry forward with the risk of exceeding the limits. I would consider, that if the Department had received earlier notice regarding repayment not being necessary, it would have allowed the Executive to commit funding at an earlier stage in the year knowing that the funding would not be repaid from future years budgets.
25. In relation to earlier clarity from His Majesty's Treasury (HMT) on funding retention or flexibility, which could have improved planning or delivery of pandemic related support and a formal mechanism for joint engagement, I would say that an immediate implementation of the UK Guarantee scheme would have provided certainty and stability for the Executive's finances.
26. In relation to lessons learned, during my tenure in the Department, I would be of the opinion that early communication to Devolved Administrations from HM Treasury on any key issues should be a priority. As outlined previously, the lack of clarity around the carry forward of funding into the 2022-23 financial year would have benefitted from earlier communications from HMT. This may have avoided the need for ad-hoc allocations very late in the financial year in order to balance the desire to maximise carry forward with the risk of exceeding the carry forward limits. Earlier engagement

and clarity on this issue would have allowed the Executive to commit funding at an earlier stage in the year, knowing that the funding would not be repaid from future years budgets.

27. I understand the Inquiry would like my view on any changes I consider could be made to funding arrangements and in particular, the Barnett formula and Barnett consequential arrangement, to improve the economic response and planning during a future economic crisis. As outlined previous, I took up post when more normal funding arrangements had been reverted to. However, I agree with the position in the DoF statement (extract provided previously in paragraph 18 of this statement) and it is my opinion that an introduction of the UK Guarantee scheme at the start of any future crisis would have provided the necessary certainty and flexibility. Furthermore, agreeing a final fiscal framework with an independently assessed needs-based factor would also allow the Executive more certainty on being funded at need which would be crucial at those times.

Key Economic Interventions – Sector Specific Business Support Schemes

28. In relation to my involvement in the design, delivery and efficacy of the sector specific support schemes (Large NAV Business Support Grant, Manufacturing Support (Industrial Derating) Grants, and the Small Business Support Grant Top-Up Scheme) in Northern Ireland, I didn't start with the Department until May 2021 when these schemes were up and running. I did not seek any amendments to the delivery of these schemes on taking up my position. I can also confirm that I had no involvement in the Executive paper issued on 11 March 2021 as this was before my time as the DoF Permanent Secretary.

29. In relation to challenges and issues during the delivery of these schemes, these were managed at the business area level in Land & Property Services , and no issues were escalated to my office. I understand that the schemes were delivered within the required timeframes and utilised the funding available, as intended. The Departmental statement provides detail on the safeguarding of public funds, the risk of fraud and error and gaps in support – I have nothing further to add to what has been provided in the DoF statement. I have not considered any changes required for these schemes.

However, should there be a future economic crisis, I believe that much would depend on the nature of the crisis and the groups or people affected.

Omicron Hospitality Payment (OHP)

30. The Omicron Hospitality Payment (OHP) scheme was announced in December 2021, during my time in the Department. The design, implementation and delivery were led by the Chief Executive of Land & Property Services, Ian Snowden with his business areas. My role, as the Permanent Secretary was to consider any submissions regarding the scheme and support the Minister, offering advice on decisions, as required. I can confirm that I cleared all submissions on the scheme, without any additional comments.

31. However, it is worth noting, prior to the formal submissions, Ian Snowden and Emer Morelli (Supply Division, Public Spending Directorate) provided a document in December 2021 which set out the DoF position in respect to the Omicron Variant, how the Department could help if a future response was required and the clear limits of the Department. I had two queries – the first being whether the Department had the vires to deliver an intervention and, the second query was around the assessment of the estimated cost. These queries were answered, confirming that DoF did have the vires required and an assessment of the cost estimate were provided. The final document was then issued to the Minister. (*CB/06 - INQ000648986*); (*CB/07 - INQ000648987*); (*CB/7A – INQ000653971*); (*CB/7B – INQ000653972*)

32. The OHP scheme was approved by the Executive under Urgent Procedure and was designed to support the hospitality sector in December 2021 when new restrictions had been introduced. The Land & Property Services (LPS) led on the design of the scheme as the Omicron variant was spreading at the busiest time of the year for this sector and affecting consumer behaviour. I understand that adequate data was available, and the scheme design was informed not by public consultation, but rather through the reactive monitoring of support provided for business within a pandemic context. The Departmental statement provides more detailed information on the scheme (paragraph 163) and the chronology of the scheme is set out in paragraph 168 of that statement. I believe the scheme was not informed or constrained by decisions made by the UK Government.

33. As outlined, I was not involved in the design of this scheme, which was led by the business area, however I understand that adequate data was available, to the extent that the schemes were designed and delivered to required sectors on the basis of data held within the property tax system. Therefore, no modelling or other scenario analysis was required. The Departmental statement sets out how fraud and error (paragraph 167) was reduced, specifically stating: *'In considering risk of fraud, LPS used data in the rating system on the occupancy for of the premises and other information held prior to implementation of the scheme to mitigate the risks. As the information held by LPS grew, there was greater capacity to cross-reference data and ascertain and minimise fraud and error. Application processes required applicants to provide information relating to alcohol licenses and bank accounts and linked to previous successful LRSS application.'* and also matters relating to vulnerable groups (paragraph 163) which outlines that: *'As with the previous schemes, consideration of the needs of vulnerable groups were not part of the design of the scheme and the section 75 considerations the same as the other schemes. The OHPS operated an application-based process, with eligible businesses asked to make an online application.'* – I have nothing further to add to this.

34. In relation to the delivery of this scheme, as stated previously, this was led by the business area. I understand that the scheme was delivered through the administration system for the rating system which had already been repurposed for support delivery for other schemes during the pandemic period. The Departmental statement (paragraph 163 to 166) sets out the detail of communicating and monitoring of the scheme but specifically outlines that: *'The total cost for the scheme was £41.36 million. In real-time, success was defined through provision of timely support and was monitored through completion of applications, reviews and payments made. However, success was not evaluated in real-time due to the urgency in the need to provide support. Overall, this scheme was deemed successful in providing support to the targeted businesses subject to closure or restrictions implemented by DoH and within the quickest timescale possible to mitigate the impact of the sudden restrictions.'* However, I would highlight that a useful communication tool used in this scheme was letters to Elected Members (**CB/08 - INQ000648988; CB/09 - INQ000648989; CB/10 - INQ000648990**) which kept them updated on the scheme. In relation to challenges

and queries, these were dealt with at business area level, and none were escalated to my office for consideration. The issues raised covered a range from a high profile query as to why hotels had not been included, to more basic queries about a link in a letter not working and a new email address needed for elected members.

35. In my view, I would say this scheme was successful and achieved its aim in providing sufficient support to the targeted businesses, subject to closure or restrictions implemented by the Department of Health, and within the quickest timescale possible to mitigate the impact of the sudden restrictions. I have no further views on any changes required to the scheme for any future crisis, but I would say that it would depend on the facts and circumstances pertaining to that crisis.

36. In terms of value for money, the Executive paper on the proposed financial support package, clearly set out that, given the limited time available, it had not been possible to undertake the detailed analysis and economic appraisal that would usually inform a determination on value for money (**CB/11 – INQ000392578**). The paper noted the need to balance the risks inherent in developing and operationalising the scheme quickly, with the broader economic impacts of making use of the money available. Minister Murphy advised that the controls within the Department put in place could not be perfect, only reasonable. I am not aware of any significant gaps or unequal support, but I note and agree with the information contained in the Departmental statement (paragraph 161).

Ministerial Direction in relation to the Omicron Hospitality Payment

37. A Ministerial Direction was issued by the Finance Minister for the Omicron Hospitality Payment due to the lack of time available to mitigate the risks to the use of public funds (**CB/12 - INQ000237277**). My specific concerns were around the lack of time available to develop the proposals. I was also concerned about the Department being unable to undertake the kind of detailed analysis, economic appraisal and public consultation process, that would ordinarily be carried out for a scheme of this size and nature, to inform a determination on value for money set against policy objectives. Also given the limited time to implement the scheme, there was a trade-off between expediency, rapid delivery and assurance. In particular, although a significant amount of work had been undertaken to check payments on previous schemes, delivering funds to

businesses quickly leaves public money exposed to the risk of errors. Whilst the Department did take steps to help to address this risk, I was of the view the controls which were put in place could not be perfect within the timeframe, only reasonable. These controls drew on the experience and knowledge built up in Land & Property Services, including making Omicron an application-based scheme, with eligibility checks informed by lessons learned and established datasets from previous schemes. Earlier schemes underwent continuous improvement, with ongoing review and improvement of systems, processes including measures to reduce fraud and error, and governance. **(CB/13 - INQ000648991)**

38. In considering the risks, I understand that the Land & Property Services (LPS) used data in the rating system on the occupancy of the premises and other information held prior to implementation of the scheme to mitigate the risks. As the information held by LPS grew from other schemes, there was greater capacity to cross-reference data and identify and minimise risks. I also understand that the scheme was designed with tighter controls than earlier schemes, notably requiring increased levels of supporting documentation from applicants including bank accounts, liquor licences etc. Importantly, the scheme was application-based only, with lessons from earlier schemes shaping both the application requirements and the processing of applications. This was communicated back to the Minister which, I suspect, likely contributed to his positive assessment of the Departments performance in administering the schemes. The scheme used a similar delivery mechanism which had been tried and tested in prior schemes which mitigated the risks further.

39. In relation to Ministerial Directions, I believe the Department used these appropriately during the pandemic, in line with requirements in MPMNI which requires a formal instruction issued by a Minister to an Accounting Officer to proceed with a course of action despite concerns about regularity, propriety, value for money, or feasibility. I requested the Ministerial Direction during the pandemic in line with good public policy, to highlight where value for money considerations were limited, given the speed and size of spending but where it is clear we needed to proceed to protect businesses. Whilst traditional appraisal methods could not be used, I believe I took all available mitigations and assurance from the business area who had delivered earlier schemes, to reconcile the need for the urgent delivery required. Whilst monitoring and evaluation

was led by the business areas, I was aware that the total cost for the scheme was £41.36 million, out of which there were erroneous payments of £220k, with £40k repaid and only five cases of suspected fraud.

40. In relation to lessons learned from the scheme, I have read the information in the Departmental statement which states at paragraph 176 that: *'LPS has completed two separate internal Lessons Learned Reviews in relation to the business support grants which it had responsibility for administering. The first report was prepared in November 2021; it covered all business support grants administered by LPS between March 2020 and October 2021. A second report was finalised in January 2023 to include further information in relation to the Omicron Hospitality Payment Scheme. All figures within this report were updated to reflect the financial position as of 31st December 2022. (IS/322 - INQ000146135; IS/323 - INQ000146136).'* Based on my time and experience in the Department, I have no personal views on this scheme so have nothing further to add.

The DoF input for the 'Living with Covid' paper

41. The Department had a limited role in the contribution to the Executive Covid Taskforce Living with Covid paper. The Department primarily provided input regarding the financial matters particularly in relation to budget for delivering schemes to support business and the need for continued collaborative working. The Department also provided a short input on hybrid working within the NI Civil Service context. All input, provided from the relevant business areas, would have been formed from their experiences of the pandemic.

Lessons Learned

42. I have considered the information about lessons learned in the Departmental statement (paragraph 175 to 186), which outlines a range of areas including the agile in-year monitoring approach, the external consultant's report on Executive grant funding, and the evaluation reports commissioned by Land & Property Services on the various schemes. The Departmental statement also reflects how the operational delivery model for the schemes was based on continuous improvement and experiential learning, as well as the administrative and policy challenges experience including the lack of interoperability between datasets held by different departments

and agencies, especially in the incompatibility or lack of alignment in address information and address formatting. While some of these lessons learned applied to a period before I joined the Department in May 2021, I agree with the basis of the information as it reflects my understanding of the various challenges and learning during that time, and have nothing further to add nor have any request for the Chair to consider.

Communications

43. In relation to informal communications, these have all been provided to the Inquiry as part of the disclosure for Module 2C.

44. I can confirm that all key emails have been retained and disclosed by the Department, and I do not hold any emails on government or private/personal devices.

45. I had previously provided my notebooks to the Inquiry during Module 2C. These were reviewed by Inquiry staff and no request was made for formal disclosure of these documents as they did not contain information on key decisions.

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.

Personal Data

Signed: _____

Date: 16 September 2025