

Lien Claimant: : Michael-Henry of the  
House: Furlong

Made under Oath on the: Eleventh of  
April Two Thousand and Twenty-One

Occupation: Ex Jaguar Land Rover Employee

Address: 29 Karonga Road  
Fazakerley  
Liverpool  
Merseyside  
L10 9LN

Record Id: **BN 1794 8049 0GB**



|                                      |                      |
|--------------------------------------|----------------------|
| Lien Debtors: Thierry Bollore C.E.O, | Sarah McCarthy       |
| Ian Holohan,                         | Andy Evans           |
| Trevor Leeks,                        | Richard Mann         |
| Grant McPherson,                     | Janet Harkin         |
| Stephanie Stephenson,                | Jason Wilding        |
| Gary McGlaughlin,                    | Fred Quinn           |
| Gary Beddows,                        | David Evans          |
| Clive Roberts,                       | Sharon Hollier       |
| Nick Teasdale,                       | Paul Cooper (T.U)    |
| Phil Henderson, (T.U.)               | Steve McGravey (T.U) |

Address: Jaguar Land Rover Limited  
Abbey Road  
Whitley  
Coventry  
CV3 4LF



The Keeper of Records, Cosmic Gazette,  
do hereby certify the foregoing document  
is a true and correct copy of the original  
of the document recorded in public at  
cosmicseencepma.com

Witness my hand and official seal this  
10 day of December, 20 25

Keeper of Records Cosmic Gazette,  
By CERK, TRUSTEE  
Trustee

Deponent: : Michael - Henry : Furlong

## Affidavit of Fact

I: Michael-Henry, of above stated address, being the Natural Living Man above the age of majority and by reason of sound mind do sincerely and honestly depose that these words; and by my own hand; written and inscribed by me; and given freely and without duress; and expressing accurately to the best of my ability the facts herein wherein I have witnessed first-hand or possess expert knowledge; and do honestly make, truly promise and solemnly vow under sacred Oath in Trust before Almighty God and all those present as witness that:

1. I am the Deponent; and having already achieving a default Judgement on this episode from Exhibits 1 and 2, shall once again document evidence in the form of an affidavit in response to the Respondents Grounds of Resistance.
2. I reserve, claim all, and waive none of my God-given, secured, and guaranteed Rights; and
3. Pursuant to the supreme Law of the Land and the God-Given Rights secured and guaranteed herein, the Natural Law is established to ensure dominion granted by God to all People, on this land, shall endure, and ensure forever that the People on this land be free from any, and all slavery, indenturement, tyranny and oppression under the colour of any Law, statute, code, act, policy, procedure, or of any other type; and
4. Pursuant to the Common Law, I cannot be compelled, manipulated, extorted, tricked, threatened, placed under duress, or coerced or so affected, under the colour of law by any Natural Person, who individually, or any capacity as, or under, any Artificial Person, agency, entity, officer, or party, into waiving any of my Rights or to act in contradiction thereof, or to act in opposite of the moral conscience and dominion granted to me by God, nor can I be deprived of any of these Rights, Privileges, and immunities except by lawful process in accordance with the Law, without that Natural and/or Artificial Person, in whatever capacity; and
5. During a shift in Jaguar on 11th August 2020, I was wearing a mask due to the alleged pandemic surrounding the SarsCov2 virus aka COVID 19, it was really hot and I suffered light-headedness and shortness of breath and felt my legs almost fold under me, this I believe was caused by oxygen deprivation from the facemask. I informed Simon Mansfield the Environmental Officer via E-mail the following day, ever since this I have never been comfortable wearing them due to anxiety and have asked many times in person and via email for evidence of a risk and Impact assessment. I have never been provided with either which leads me to believe there are none, thus not covered by indemnity insurance and in breach of health and safety protocols, the Health and Social care act 2012 and the Nuremburg code

Deponent: *Michael-Henry: Kurlong*

Article 6 section 3. Company policy does not usurp UK Law, I believe the masks to be a medical procedure as they restrict oxygen, I never once consented and was intimidated into compliance. Again, company policy does not usurp UK Law.

-See **Annexure 1** (Certified copy of 12<sup>th</sup> August 2020 email Correspondence, 3 pages)

-See Fraud Act 2006 Section 3, Fraud by failing to disclose information and Section 4, Fraud by abuse of position.

6. The wall of silence I encountered led me to further investigations and correspondence which resulted in me being referred for, what I can only say was a Psychological evaluation. I did question who referred me and if they were medically qualified however I was again compartmentalized and nullified, I received no response and Janet Harkin informed me I could not get this information via a Subject Access Request, like Fred Quinn giving the diagnosis "it's not good enough" upon me informing him of my Anxiety, and Richard Mann refusing to relocate me to a green role, then sending me home OFF PAY ((see point 5 on Respondents Grounds of Resistance, **Annexure 7**); which claims I was suspended with pay. This is false) on 19<sup>th</sup> November, even though I was fit to work in safer conditions, saying "I was being silly". It would appear we have another moonlighting medical Professional, although it may take further investigation to locate the incumbent.

-See **Annexure 2** (Certified copy of August 25<sup>th</sup> and September 1<sup>st</sup> email correspondence, 3 pages)

-See Fraud Act 2006 Section 3, Fraud by failing to disclose information and Fraud Act 2006 Section 4, Fraud by abuse of position.

7. In point 3 of the Respondents Grounds of Resistance It says that I emailed claiming I was stressed, it does not state the time and date of the email, I believe I have mentioned the stress caused as a result of oxygen deprivation caused by wearing masks, I felt I ought to clarify this. I would like to know who it was that referred me and if they were medically qualified? I asked Paul Cooper about this.

-See **Annexure 2** (25<sup>th</sup> August E-mail).

-See Fraud Act 2006 Section 2 Fraud by false representation and Section 3, Fraud by failing to disclose information

8. In 6b of the Respondents grounds of resistance it states that I refused to wear a face covering Several times, this statement is false, the only time I refused to wear it under duress was on the day I was sent home off pay namely 19<sup>th</sup> November, I was awaiting a response from the Conditional Acceptance I emailed to Several members

Deponent: *Michael-Henry Furlong*

of management on 15<sup>th</sup> November. This was sent with genuine concerns due to what I had experienced and the reluctance of anybody to produce documents confirming the mandate adhered to the Indemnity insurance policy and my Exemption being disregarded.

-See **Exhibit 2, Annexure 4** (Certified copy of Conditional Acceptance Email and attached Notice).

-See Fraud Act 2006 Section 3, Fraud by failing to disclose information

9. In 8a and 12 of Respondents grounds of resistance (**Annexure 7**), again it is alleged that I persistently refused to wear a face covering, again this is false as up until the 19<sup>th</sup> November when I did refuse, as I was awaiting answers to Conditional Acceptance, I had worn them under duress but removed them to underneath my chin when short of breath. If this were the case, I am sure there would have been other Incident reports raised. There is a distinct difference between reluctant adherence under duress and refusal. Refusal always results in an incident Report.

- See (**Exhibit 2, Annexure 4**).

-See Fraud Act 2006 Section 3, Fraud by failing to disclose information

10. In 8b of Respondents grounds of resistance it states I 'refused to comply with a reasonable request to wear a face covering' despite my exemption and the reluctance of the Respondents agents to provide evidence of Risk and Impact assessment. Company policy does not usurp UK Law. I never consented and tried in vain to negotiate. My questions, emails and letters were totally ignored. My contract had been altered without me being party to any negotiation and to the detriment of my health without my consent, due to the reluctance to answer pertinent questions by all the respondents. This amounts to Trespass and administering my property without right.

-See Fraud act 2006. Section 3, Fraud by failing to disclose information, and Section 4, Fraud by abuse of position.

Fraus est celare fraudem. It is a fraud to conceal a fraud. 1 Vern. 270

11. In point 10 of Respondents grounds of resistance it states that the OH report says there was no reference to an underlying health condition. My anxiety was caused by oxygen deprivation as a direct result of being intimidated and coerced under duress to voluntarily reduce my oxygen intake despite my exemption. I did inform the Doctor of the incident on the 11<sup>th</sup> August and the anxiety experienced since due to oxygen deprivation and reluctance for my questions to be answered. At the end of the assessment, he asked me would I like to see the report Prior to the Respondents

Deponent: *Michael-Henry Furlong*

Agents? Although I felt was a genuine gesture, I did not feel the need to question his report as I had told him the situation and my own doctor had told me over the phone that all's he could do for me was to give me a print off of the government website, therefore there would be no documented evidence of any underlying health issue, but I was still put under duress to wear one having been told by Fred Quinn that Anxiety wasn't a valid excuse. Andy Evans was alleged to be chairing an "investigation" into this on 12<sup>th</sup> November but when I informed him of the Downgrading of SarsCov2 as no longer a highly infectious Disease by the Government on their official website on the 19<sup>th</sup> March (**Exhibit 1 Annexure 5**) and the freedom of information requests that had been sent to several organisations including Public Health England (**Annexure 3 page 25**) Andy stated it was "Irrelevant" even though he stated the Respondent's Mandate information was based on Public Health England Instructions. This evidence was mentioned in Jason Wildings investigation, Nick Teasdale's, and Clive Roberts appeal meetings along with the reluctance of several of the Respondents agents to produce risk and impact assessments, none of the Respondents agents were interested in conducting a proper investigation. It just seems off to me the behaviour of the respondent's agents, regarding the measures being taken and the reluctance to investigate serve as evidence they are complicit in a Global Coup D'état. Based on my treatment since raising valid questions, Public Health England, (if they are advising the respondent as stated by Andy Evans in the disciplinary on 12<sup>th</sup> November) (See **Annexure 6**) show they are implementing such measures, because of an alleged instruction from an entity who hold no information detailing isolation. (See **Annexure 3 page 25**) I am currently awaiting the disclosure of a Freedom of information request sent to the respondent's legal department on 22/03/21 for the alleged correspondence with P.H.E. I would submit all results to the tribunal Obviously, if requested. In the Nuremburg trials "I was just doing my job" was no excuse, though I do believe some incumbents may not be fully aware what that they are accessories to these crimes. Ignorance of the law however is no excuse. God Bless them. This is Trespass, administering my property without right and fraud.

Culpa lata aequiparatur dolo. A concealed fault is equal to a deceit.

-See Fraud Act 2006. Section 4, Fraud by abuse of position.

There is no statute of limitations on Fraud.

-See **Annexure 3** (Certified copy of Isolation Information, 28 pages)

12. In point 16 of Respondents grounds of resistance it says that I claimed the mask mandate was a social experiment which is not 100% true, I said that "without a Risk/Impact assessment" which I had endeavoured to locate, to no avail, "only then,

Deponent: :Michael-Henry:Furlong

it is a social experiment requiring my consent under the Nuremburg code". It also states a doctor directed me to an NHS website for a form which I printed off from hidden disabilities, this is false. The statement I made was my doctor informed me regarding my anxiety, that all they could do was give me a printout off the Government website for exemption. Fred Quinn said it was "not good enough". I found this strange as the Respondent says that they follow government advice, yet they ignore government advice on Exemption. This led me to source A lanyard.

-See Fraud Act 2006. Section 4, Fraud by abuse of position.

13. In point 19 of Respondents grounds of resistance it says Fred Quinn had acted appropriately when seeking clarification of reason for not wearing a face mask. I informed Fred of my reason being anxiety to which he responded "It's not good enough" posing the question again; Is he medically qualified to make that call? I am not aware of anyone else with an exemption being treated in this manner. In the Clive Roberts/Sharon Hollier meeting on 1<sup>st</sup> February, I asked "So you are saying Jaguar don't accept Exemptions?" To which "Sharon responded "No, that is not what we are saying" yet my exemption does not qualify, and I can't fathom why.

-See Fraud Act 2006. Section 4, Fraud by abuse of position.

Fraus latet in generalibus. Fraud lies hid in general expressions.

14. Given the evidence I have produced during this whole stressful episode it is clear to see the reluctance to investigate and total lack of due diligence with regards to Jaguar employee's health and wellbeing, genuine questions of concern on justifying the Mandate totally ignored. No risk or Impact assessment ever produced, and constant lies over my alleged persistent refusal of facemasks even though I was made to wear them under duress with an exemption.

-See Fraud Act 2006. Section 4, Fraud by abuse of position.

15. In point 22 of Respondents grounds of resistance the statement is made that the Respondent denies my dismissal was unfair and the reason for dismissal was conduct. I reiterate again, all I have done is merely ask pertinent questions necessary in confirming the mandate to be safe, covered by Indemnity insurance and justified, and safeguard my inalienable right of bodily integrity after being intimidated and coerced to wear a garment that restricts my airflow and directly affects my performance on my Job. Again, company policy does not usurp UK Law. I do not know why Fred refused to acknowledge my exemption nor why Richard Mann refused to locate me to a Green role and sent me home without pay yet the following week after, my pay was reinstated. I informed him he was acting illegally and unlawfully, and I was fit to work in a green environment, it appeared to me like they had received strict orders from above.

Deponent: : Michael - Henry : Furlong

16. In Point 23 of Respondents grounds of resistance the claim is made that Jaguar are a reasonable employer, when if you look at the evidence provided in **Exhibits 1, 2 and 3** (all sworn under sacred Oath under penalty of perjury), of evasion of questioning, reluctance to produce or evaluate evidence, fraud, breaches, lies, intimidation, coercion, and total lack of due diligence this statement is clearly false. Gary Beddows telling lies in order to Drug test me and two of his superiors lying about any prior knowledge on a day of a potential fatality, (See **Annexure 1**) then Jason Wildings blatant disregard of company policy when issuing me a stage 3 absence in the presence of Phil Henderson I would say this behaviour is the exact opposite of reasonable and a breach of company policy witnessed in person by a trade union representative who sat and watched me fight my corner, and did nothing, that is fraud, as I pay the union money to protect me from fraud. (See **Annexure 2**). After submitting a company Grievance regarding Mr. Beddows I was myself subject to disciplinary action by Ian Holohan for daring to complain, on the Grounds of Alleged abuse of the Grievance Procedure and vexatious correspondence I fought this to the end to no avail by the time the appeal process was over the unwarranted charge was all but spent. It was an incredibly stressful time. So, when the Respondents legal team claim reasonable id say they are most unreasonable, and corrupt.

-See Fraud Act 2006, subsections, (a. Section 2 Fraud by false representation, b. Section 3, Fraud by failing to disclose information, and c. Fraud by abuse of position)

17. In point 25 of Respondents grounds of resistance, a mention is given to **Exhibit 2**. This was mailed to Jaguar and emailed to those whose address I had, people with standing in the matter and first-hand knowledge as only they can rebut the affidavit with regards to the trespass and administering of my property without right and the fraud that has occurred.

18. In point 26 Respondents grounds of resistance the Respondent claims it will rely on polkey vs AE Dayton services as case law. I would like to state that it has no standing, first-hand knowledge, or relevance to this case.

19. I received a letter from Stephanie Stevenson on the 16th March 2021 and an email from Sarah McCarthy on 19<sup>th</sup> March requesting me to only correspond with a third party I have never met, again with no standing or first-hand knowledge regarding my case. I responded with a letter of costs for third party correspondence.

-See **Annexure 4a:** (Certified copies of Instruction for third party liaison) and **4b:** (Certified copy of Notice of Liaison costs)

20. The Respondent denies that the claimant was unfairly dismissed but as you can see with the evidence provided there has been Trespass, administering of my property without right, breaches, lies, fraud, evidence refused and ignored, exemptions

Deponent: : Michael-Henry : Furlong

ignored, character defamation, Intimidation at work, bullying, theft of wages and bonus payment, and I have had my mental health questioned by people I cannot identify, and the union gave me no help (See **Annexure 2** August 25<sup>th</sup> email to Paul Cooper)

-See Fraud Act 2006. Section 2 Fraud by false representation.

21. On the 8<sup>th</sup> March I sent a Notice of breakdown of costs to Thierry Bollore informing him of his prior tacit agreement by omission and default charges, again I received no response.

-See **Annexure 5** (Certified copy of Breakdown of costs).

22. Andy Evans, refused to acknowledge several bodies of evidence when offered to him upon his Statement "we take our instruction from Public Health England" and the fact the government downgraded the alleged virus on 19 March 2020 (See **Exhibit 1 Annexure 1**). He also made a statement that it was I whom had an agenda, which I find outrageous given the information I offered which was Ignored, Janet Harkin and Steve McGravey (Trade Union) were present.

-See Fraud Act 2006, subsections, (a. Section 2 Fraud by false representation, b. Section 3, Fraud by failing to disclose information, and c. Fraud by abuse of position).

-See **Annexure 6a**: (Certified copy of Lien Claimants Minutes 12 November 2020).  
**6b**: (Certified copy of P.U.B Private Prosecution news.)

-See **Annexure 8**: ( Certified copy of F.O.I.R to Liverpool Mayor 01/04/2020)

23. For the purposes of reference, the Respondents Grounds of Resistance is enclosed.

-See **Annexure 7** (Certified copy of Respondents Grounds of Resistance).

24. In the event that any provision or wording of the present Affidavit is held to be invalid or unenforceable in Law, such provision or wording shall hereby be severed from the present Affidavit to the extent that such provision or wording is void, invalid or unenforceable. Furthermore, any such ruling shall not affect the validity or enforceability of the remainder of the present Affidavit:

Deponent: : Michael-Henry : Furlong

## CERTIFICATE OF ANNEXURE'S

I; Michael-Henry of the House: Furlong, the duly appointed Authorised Representative of MICHAEL HENRY FURLONG hereby certify the following Annexures were presented, sighted, and certified before me and sealed by two good men as witness:

**Annexure 1: a:** Certified copy of 12th August 2020 E-mail Correspondence. (2/3 pages).

**B:** Certified copy of 13<sup>th</sup> August 2020 E-mail Correspondence. (2/3 pages).

**C:** Certified copy of 13<sup>th</sup> August 2020 E-mail Correspondence (1/3 pages).

**Annexure 2: a:** Certified copy of 25<sup>th</sup> August 2020 E-mail Correspondence (1/3 pages).

**B:** Certified copy of 25<sup>th</sup> August 2020 E-mail Correspondence (1/3 pages).

**C:** Certified copy of 1<sup>st</sup> September 2020 E-mail Correspondence. (2/3 pages).

**Annexure 3:** Certified copy of Isolation Information. (28 pages)

**Annexure 4a:** Certified copy of Instruction for third party liaison. (1 page).

**4b:** Certified copy of Notice of Liaison costs. (BN 2016 3484 4GB). (1 page).

**Annexure 5:** Certified copy of Notice of Breakdown of Costs. (BN 2016 3313 2GB). (1 page).

**Annexure 6: a:** Certified copy of Lien Claimants Minutes of Andy Evans Disciplinary. (15 pages)

**6: b:** Certified copy of P.U.B Private Prosecution info. (4 pages).

**Annexure: 7:** Certified copy of Respondents Grounds of Resistance. (9 pages).

**Annexure: 8:** Certified copy of F.O.I.R, E-mail to Joe Anderson. (11 pages)

Deponent:

: Michael Henry : Furlong

DEFAULT CONDITIONS

Lien Debtor was given 30 days to deliver to Lien Claimant material evidence in support of an appropriate point-for-point rebuttal under oath or affirmation of the foregoing allegations Contained in Affidavit (**Exhibit 1**). Failure to repudiate or rebut with material evidence every allegation resulted in Lien Debtor becoming immediately liable for the payment of FOUR HUNDRED AND SEVENTY THOUSAND GREAT BRITISH POUNDS STERLING. Triple Damages of FOUR HUNDRED AND SEVENTY THOUSAND GREAT BRITISH POUNDS STERLING x3 is also be added to the debt as Lien Debtor's default was not cured (**Exhibit 2 Annexure 1**). It was not cured within 90 days, Perfecting the Lien. Lien Debtor is now liable for Exemplary Damages of FOUR HUNDRED AND SEVENTY THOUSAND GREAT BRITISH POUNDS STERLING x 100 following NOTICE OF DEFAULT DATED 05/03/2021 (**Exhibit 2 Annexure 2**).

AFFIRMATION

I, :Michael-Henry:Furlong

Authorised Representative for MICHAEL FURLONG (Lien Claimant), hereby affirm upon my own unlimited commercial liability and under penalty of perjury, that I have read all of the contents of this Affidavit of Fact, and to the very best of my knowledge, I believe that the facts expressed herein are true, correct and complete.

:Michael-Henry:Furlong Executed by:

mf. Seal :Michael-Henry:Furlong

:Michael-Henry:Furlong

Authorised Representative for MICHAEL FURLONG (Lien Claimant)

Responsible party and holder in due course, beneficiary.

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit

Errors & Omissions Excepted

Deponent: :Michael-Henry:Furlong <sup>10</sup>

ACKNOWLEDGEMENT

Before me the Flesh and blood Natural man acting in and for the County of; Merseyside and  
Town of: Liverpool on this: 11th day of: April 2021, personally appeared and known to me to be the  
identical living man: Michael-Henry: Furlong, who executed by Will and Intent expressing accurately  
Animus Testandi the foregoing Affidavit and then acknowledged to me his free and voluntary act.  
Given under my hand and seal;

Witness One (1): Dean : Robinson :



Address: 42 Swainson Road,  
Fazakerley,  
Liverpool,  
L10 9NF

Seal:



Signed & Sealed By:

Dean - Edward : Robinson

Dean - Edward : Robinson

Deponent: : Michael-Henry : Furlong <sup>11</sup>

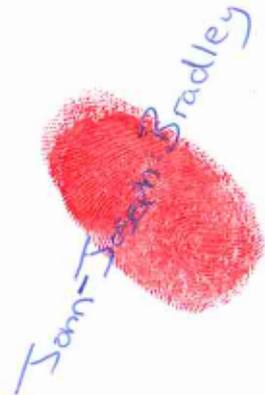
ACKNOWLEDGEMENT

Before me the Flesh and blood Natural man acting in and for the County of: Merseyside and  
Town of: Liverpool on this: 11th day of: April 2021, personally appeared and known to me to be the  
identical living man: Michael-Henry: Furlong, who executed by Will and Intent expressing accurately  
Animus Testandi the foregoing Affidavit and then acknowledged to me his free and voluntary act.  
Given under my hand and seal;

Witness Two (2): John-Joseph: Bradley:

Address: 43 Karonga Road  
Fazakerley  
Liverpool  
L10 9 LN

Seal:



Signed & Sealed By:

John - Joseph : Bradley

An un rebutted Affidavit becomes a judgement in commerce. See Heb. 6:16-17. Any proceedings in court, tribunal or arbitration forum consists of a contest of commercial affidavits, wherein the points remaining un rebutted at the end of the contest stand as truth to which the judgement of the law is applied.

NOTICE is hereby given that the Lien Debtors have Twenty-One (21) days after receipt of this Affidavit of Fact to rebut, deny, or otherwise prove invalid the allegations contained herein. Failure to rebut, deny or otherwise disprove any of the allegations will be construed as Lien Debtors' affirmation that said allegations have been proven to be true, correct, and complete. Void were prohibited by law.

Deponent:

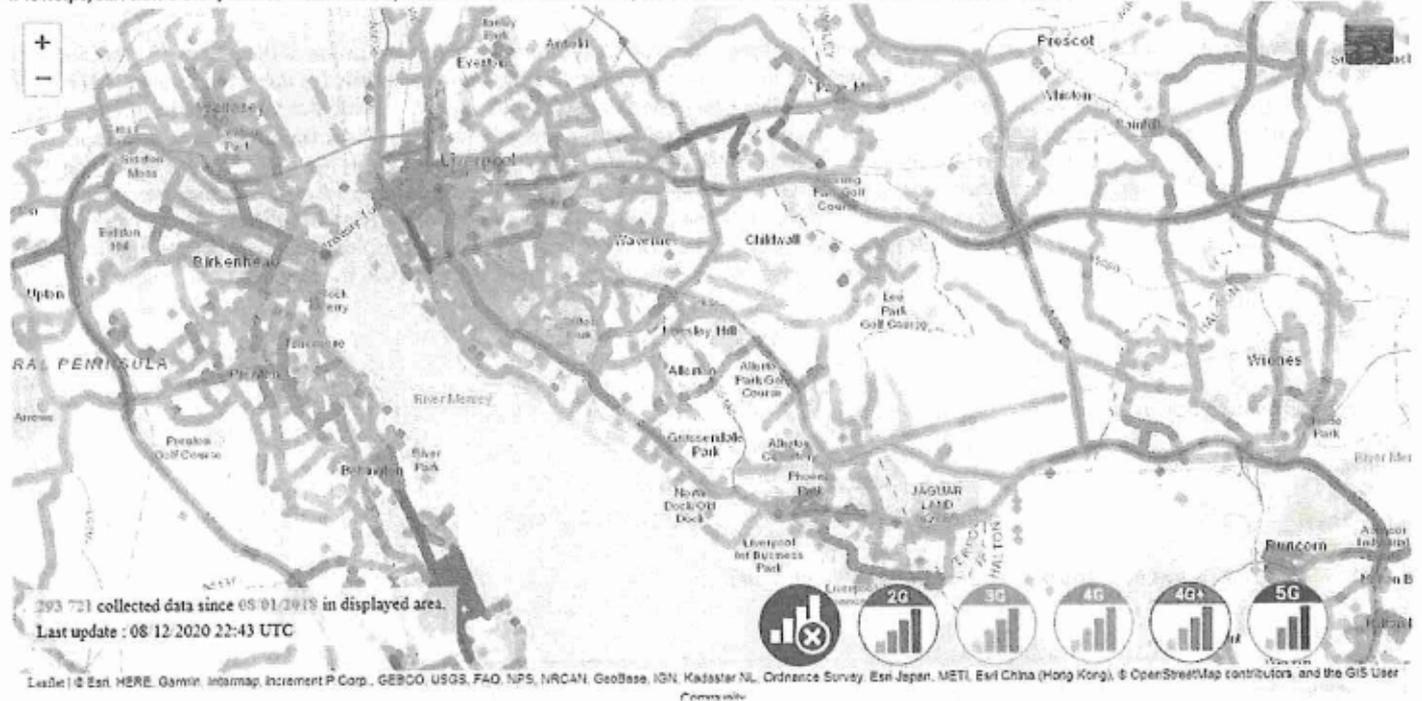
Michael - Henry : Furlong<sup>12</sup>

10/26/2020

Email - Michael Furlong - Outlook

On your 2<sup>nd</sup> point, I get the concerns of microwave radiation but sit on the fence with an open mind when it comes to 5G. The most vocal campaigners appear to be from far right political groups & use anonymous Social Media bombing techniques to share fairly unscientific viewpoints. This includes Mark Steele (see [https://www.vice.com/en\\_uk/article/wxeb45/my-dad-got-hoaxed-by-the-anti-5g-conspiracy-movement](https://www.vice.com/en_uk/article/wxeb45/my-dad-got-hoaxed-by-the-anti-5g-conspiracy-movement) and Financial Times is similarly scathing of him: <https://www.ft.com/content/fffb59b0-3ef9-11e8-b7e0-52972418fec4> )

If it helps, JLR don't own/ install transmitters, however we do rent roof space for a mobile phone mast, but the nearest 5G coverage seems to be Edge Lane:



I hope this helps define more ways for you to resolve your predicament. I felt really apprehensive about returning to Halewood (we were back 1 April), but have developed more confidence as I've got used to safer ways of working at distance – easier for me in an office and feel much more able to at least mitigate contact risk.

16) cont...

It is important that you get this sorted, glad you're doing this.

Good luck & warmest regards

Si  
Simon Mansfield B.Sc Hons MIEMA C.Env  
Senior Environmental Plant Engineer/ Site Environmental Representative, Halewood

BAME (Black, Asian & Minority Ethnic) Lead, Halewood  
Please join BAME Yammer Group to show your support [here](#)

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Registered in England Number 1672070

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From: Michael Furlong <[m182684@outlook.com](mailto:m182684@outlook.com)>  
Sent: 12 August 2020 21:33  
To: Simon Mansfield <[smansfi1@jaguarlandrover.com](mailto:smansfi1@jaguarlandrover.com)>  
Cc: Paul Cooper <[pcooper@jaguarlandrover.com](mailto:pcooper@jaguarlandrover.com)>  
Subject: Heath Concerns.

1 a).

1/3 MF

Simon,  
I hope you are well,  
My name is Michael Furlong.

EXHIBIT 3

ANNEXURE 1

10/26/2020

Email - Michael Furlong - Outlook

I am currently working on doorline west for Fred Quinn at Halewood. I have been employed here since 2011. Yesterday I had a dizzy spell and almost passed out and had to remove my face mask due to the heat and the restriction of my oxygen. I am writing to you with genuine concerns I have with the current situations we find ourselves in. I find my working conditions are really stressful both physically and mentally and Dangerous due to the Mandatory implementation of face masks/visors implemented, I was told by Ian Holohan on Trim and Final. I felt compelled to contact you directly in writing as the issues on my mind I feel are most important with regards to Jaguar Land Rover and our workforce. I will endeavour to articulate the issues as best I can but I do feel this needs your immediate attention.

My first concern to contact you was the occurrence mentioned above and after some reflection I realised there are a few issues I would seek your professional advice, if you could kindly acquiesce? They are as follows:

1) The conditions yesterday and today caused my temperature to soar and with my oxygen intake restricted and dizzy spells due to the mask it occurred to me this could easily be misdiagnosed as covid 19 due to no Medical now on site. This left me somewhat worried and stressed and I felt I should raise it because Preventative measures in place would minimise the chance of a potential incident. I am my own health and safety officer first and foremost. However, the line next to me do not need to wear masks/visors and therefore I must question why Trim and final, on physically demanding roles in such heat must be deprived of oxygen or made to struggle with visual impairment on a takt time of 92 seconds with mask/visors. Could you possibly look into this?

I was told should I remove the mask I would be disciplined yet paint select are grouped together with no anti-social measures in place and no PPE this has left me rather stressed out both mentally and physically. Fred advised me medical conditions are exempt but after almost fainting on Tuesday It occurred to me what if a medical condition arose from such working conditions that need to be Risk assessed to avoid a potential L.T.A. Could you advise of the disciplinary action related to this as with it not being fully mandatory it is a little confusing. I could maybe email my doctor if required.

There was an interesting news programme in regards to this issue I feel may help you in this research dated today on [www.ukcolumn.org](http://www.ukcolumn.org) according their research the government have carried out no risk assessment on face masks. Both the Centre for disease control (CDC) the W.H.O both recommend masks only if you have symptoms to contain potential spread. Yet the masks do raise your temperature immensely on physical jobs in August with minimal air circulation thus giving you a high temp which could be misdiagnosed as covid symptoms thus increasing the case numbers as it is now cases pushing the agenda as opposed to deaths. It felt rather synchronistic listening to this programme returning home from work having requested your email address.

2) My other concern is to clarify will Jaguar Land Rover be installing the new 5g wireless network? I would like to know this as there remain several questions unanswered with regards to testing of this technology. A guy called Mark Steele, a weapons expert from Gateshead, successfully stopped the rollout of 5g in Gateshead on 17 may 2019, due to ionising and non-ionising radiation and its effect on human beings. After researching this myself, I found that the symptoms of radiation poisoning are eerily similar to the Covid 19 symptoms so I took the time to email Liverpool Mayor Joe Anderson with a freedom of information request in April. The response I got hardly filled me with confidence as it was redacted and did not give any information at all and without testing, no Insurance company would cover 60Ghz technology. I am yet to report this response to the police as being complicit in genocide and is Treasonous toward the sovereign men of these lands. I did however hear the US senate interview on 3rd December 2018 where a Senator Richard Blumenthal expressed his concerns regarding the health implications of releasing such untested technology directly on the public with no prior risk assessment/ testing. A co-worker recommended I should speak to yourself about my concerns as he also had looked into this a little and told me you were rather competent in your Roll as H&S manager. I hope this is not too much trouble but given the current situations I felt a duty of care and a legal and moral obligation of asking these pertinent questions. I feel should 5g be installed without testing and Insurance I may need to consider my career options as a pension would be no good in the event of a fatality due to blood coagulation. Any advice or information you could provide to shed light on these most important topics would be much appreciated to alleviate my concerns.

Yours Sincerely

Michael Furlong  
182684

God bless you Simon.

1 a) cont...

mf  
3/3

**Re: Heath Concerns.**

Michael Furlong &lt;mf182684@outlook.com&gt;

Thu 13/08/2020 19:43

To: Simon Mansfield &lt;smansfi1@jaguarlandrover.com&gt;

Simon,

Thank you for your response. This was not a complaint. I was sanctioned for alleged "malicious lies and abuse of the grievance procedure" after raising a grievance against Gary Beddows who continues to approach me now. So I chose not to peruse this down that avenue. My goal was to put data in the system that is available on company record. I have lots. Mr Beddows frequently confers with me, which I do believe is a breach however my union do not aid me. This is all documented. I raised the grievance after being subjected to a drug test on the grounds of apparently "stinking of alcohol" 10 minutes prior to this encounter I had spoken in depth to both Phill Hannah and Tony Nielsen who were on my line due to a major safety incident where a pneumatic roll bar on a convertible evoke had been released which had the potential of causing a fatality. Needless to say, neither Phil or Tony had any recollection of this encounter which I found rather peculiar given the circumstances. I do hope Alzheimer's is not a symptom of covid 19 or their goose is cooked. It concerns me that people in such positions cannot recall their movements on days of such events. But we take it in our stride and keep on keeping on. Like sieving for gold. We eliminate the slag. Fred is a breath of fresh air in these torrid times.

Take care Simon

Appreciate your quick response.

Regards

Michael

For we fight not against flesh and blood but principalities and power.

God bless

---

**From:** Simon Mansfield <smansfi1@jaguarlandrover.com>**Sent:** 13 August 2020 08:47**To:** Michael Furlong <mf182684@outlook.com>**Cc:** Paul Cooper <pcooper@jaguarlandrover.com>**Subject:** RE: Heath Concerns.

Hiya Michael

Good to hear from you, really sorry to hear that you've been suffering in the heat and with masks/ visors. I'm no fan of Ian Holohan's management style and am sorry to hear about this approach to staff safety and welfare. I'm disappointed to hear that hot weather mitigation has not been put in place at a sufficient level either.

Unfortunately, I am employed as Site Environmental Representative and unable to action your complaint – Claire Millington and Stuart Pennington manage Halewood H&S and Occ Health cover seems reduced since closure of Medical Centre & centralisation of service but on Monday, David Evans was appointed to the position of Deputy Occupational Health Advisor – Halewood Operations.

However, in my experience as former Branch Secretary of Merseyside Fire & Rescue non-uniform Trade Union, here are some actions for you to consider to help with your issues:

- Have a conversation with your Team & GL to see if feeling is shared & what you can do together to alleviate heat stress a little
- Think about swapping to permanent lates during heatwave (or perhaps earlies would be better? – no nights yet)
- Contact new Occ Health Adviser David Evans [devans35@jaguarlandrover.com](mailto:devans35@jaguarlandrover.com) for further advice
- Have a sit down with Fred – he's one of the good ones!!
- Ask your GL to consider a request to work without mask/ visor, for an individual assessment to facilitate this
- Complain to your TU H&S Rep about masks/ visors blanket rule & ask for individual approach where these are causing stress (it hinges on ability to remain at 2m distance/ exposure time more than 15 mins)
- Ask both GL and TU H&S Rep to ensure hot weather procedures are put in place including:
  - Provision of cold water regularly
  - Dress code change to allow shorts where safe to do so
  - Provision of more fans
  - Slowing of Takt Time
  - Change cell layout to facilitate greater cross-flow of air/ doors open
- Consult your Doctor (phone or video call may be possible) about face mask exemption
- Consult your Doctor about stress, if the situation is making you feel really unwell or upset

The main thing is not to feel on your own with the issue of heat stress, and to work with GL, PL, Trade Union, Family Doctor to resolve the situation. TU should react quickly to concerns that affect large parts of our workforce and be able to advise on disciplinary status. I'm glad that you're reaching out for help.

I agree with you on the effectiveness of masks, but they should at least reduce aerosol that we breathe out and also help to reinforce a culture of hand hygiene & care about distancing etc.

EXHIBIT 3

ANNEXURE 2

For we wrestle not against flesh and blood,  
but against principalities, against powers,  
against the rulers of the darkness of this world,  
against spiritual wickedness in high places - Ephesians 6:12

b)

Sent: Tuesday, August 25, 2020 at 10:26 PM  
From: "Paul Cooper" <pcooper@jaguarlandrover.com>  
To: "Michael Furlong" <michaelhenry@chef.net>  
Subject: Re:

Hi Mick,

Sorry to hear you are struggling with your mental state. Unfortunately without knowing the full facts there is no way I could advise as there are scenarios where gary mcgloughlin could be copied into a email, it is completely dependant on the nature of the email. Your best bet is to speak to phil Henderson and run him through the full story and seek his advice on the matter. Even if I knew all the facts I would only pass it on to phil anyway rather than advise as we don't step on each others toes as regards shifts and constituencies. Apologies for not being able to give you the answer you are looking for but I hope you understand the reasons why.

p.s. don't be shy of asking for help with your mental health mick, there is good help available through the company. talking to a trained councillor might be a option worth considering mate.

regards

-----  
From: Michael Furlong <michaelhenry@chef.net>  
Sent: Tuesday, August 25, 2020 8:40 PM  
To: Paul Cooper <pcooper@jaguarlandrover.com>  
Subject:

a)

Hello Paul,

I think there has been a data protection breach and wondered if you could find out. I emailed Phil Jervis and David Evans on 14.08.20 and I received reply with "mcgloughlin" copied in could you find out who referred me? As if it was David I don't think mcgloughlin need know as far as I am aware he is not medically qualified. Not to mention I feel the whole attempt at the compromising and the questioning of my mental state is preposterous considering the information I have shared. Could you clarify this please Paul before I take this call? I would rather communicate via email with these people as we are all busy. The written word is harder to bend. Keep this to yourself please Paul. I would appreciate some feedback if possible prior to the call from Katherine Lea.

Regards

Michael Furlong  
182684

1/3

MF

EXHIBIT 3

ANNEXURE 2



Re:

(C)

From: "Michael Furlong" <michaelhenry@chef.net>

To: "Paul Cooper" <pcooper@jaguarlandrover.com>, fquinn2@jaguarlandrover.com, devans35@jaguarlandrover.com

Cc: Tleeks@jaguarlandrover.com, GMcpthers@jaguarlandrover.com, Iholoan@jaguarlandrover.com

Bcc: Pdo01yo559@blueyonder.co.uk

Date: Sep 1, 2020 5:57:34 PM

Hi Gentlemen,  
I am not struggling with my mental health Paul. I am struggling with the current political agendas and lies. I have been referred to Occupation health for challenging the company mandate on masks which I backed up with evidence. This was also a breach of the Nuremberg Code article 6 section 3: In NO case should a collective agreement or the consent of a community leader or ANY other authority, substitute for an individuals consent.

The virus has never been isolated by Kochs postulate so it does not exist, otherwise it would be tested under Kochs and isolated. The figures are down on the 5 year average of seasonal flu deaths but it is now being gauged on cases rather than deaths. The nhs where instructed to get pensioners to sign "do not resuscitate forms" several staff have confirmed this. The CDC openly admitted that the death figures were "greatly exaggerated". Which brings me on to 5 g radiation. A gentleman called Mark Steele won a lawsuit in Gatheshead to stop the rollout of this technology by proving it is detrimental to biological health, He is a weapons expert and this non ionising radiation operates in mm wave so it can be adjusted. The result of being subject to this frequency of radiation causes the blood to coagulate from not being able to decode oxygen. I believe this is the reason for the "no autopsy" on the treasonous corona bill. No insurance can cover this technology as it has not been tested, if it was tested it would be proven to harm human beings therefore would be exposed as Genocide. A freedom of information request I sent to Joe Anderson came back redacted. I mean realistically on evidence and numbers, if this virus were so contagious and dangerous why would you need to test for it in the first place? Why no hazard material bins for masks? Why doesn't the virus frequent pubs? How does it only attack party's of 7 plus? If anti social measures work why the need for masks? and vice versa. The government themselves downgraded the threat posed 5 days prior to lockdown. It appears to me as a timely sideshow for what is to come. All of the knowledge I have acquired was from reading and research none of it from mainstream media. Two million people turned out in Berlin on a protest on Saturday. Mainstream media said there was 20,000. The plot thickens like blood subjected to 60Ghz of 5g radiation. Why is nobody talking about the sudden disparity between new cases and (lack of) deaths?

I do believe this is a sinister agenda orchestrated by a government of occupation who are still pushing Britain into a European Defence Union behind all of this madness despite the vote to exit the E.U. This is treason to the sovereign men of these lands.

Giving our borders to a foreign power against the will of sovereign men is Treason, potentially High Treason. It is a breach of Article 61 of the Magna Carta. I can assure you I have done my research on all of this and will continue to do so. Being aware through studying and investigation is not a mental flaw it is an asset I am grateful I possess. Critical thinking and analysis of these subjects that the government continue to avoid to address. I have been instructed to attend an occupational health phonecall for questioning the mandatory use of masks which might I add was not mandatory as paint select did not have to wear them. I emailed staff about this and it appears common sense has prevailed with the mandate being lifted although, I have been referred for Occ Health call. I will attend the call. The

2/3

MF

truth fears no investigation.

"The ability of the owners of the political media class to discredit and neutralize anyone who poses a threat to their interests simply by rearranging the narratives about them is one of the most destructive psychological weapons in their arsenal. The main reason it's so hard to convince the public that they have been taken in by pro-pagan-da and smear campaigns is because for some stupid reason one of the most shameful things anyone can do in our society is be fooled. If we are to overcome the narrative dominance of the powerful, it's essential that we find a way to shift that shame from those who have been fooled onto those who have been fooling them" - Caitlin Johnstone.

cji

Union Representation

I refuse to deal with Phil Henderson since he represented me in an absence case where I was sanctioned for a "pattern" of absence for one day off having being below the annual 4% trigger, this is unacceptable representation and several of his constituents are also not happy with his work ethics. This could be a problem for me should I need representation in the future so would you kindly inform Joe Swift of my situation for representation should I need any in the future or could you possibly send me his email? I don't feel you would be "stepping on his toes" Paul as I do not wish to have him represent me therefore he has no say in the matter. Or would I be required to lodge a vote of no confidence? It would be a conflict of interests my asking him these questions. Should this pose a problem for unite, if you could let me know I would seek representation elsewhere. As a matter of fact Paul could you forward this to Joe Swift please.

I appreciate your concern Paul but my mental state has never been better.

I feel I have a moral obligation to alert you all of the political agenda we face.

The alleged pandemic is a smokescreen. Research it. It will have a major impact on all your family's quality of life be it the vaccine, 5g or even freedom of speech.

This agenda is long in the making and if you would like to research this NWO satanic plot here are some key topics...

- The protocols of Zion
- The Tavistok institute
- MKUltra
- Robert Maxwell
- Ghislaine Maxwell
- Jeffrey Epstein
- LAW (LAND,AIR,WATER)
- Maritime Law
- Natural Law
- Ipsos Mori (They Die, adapt or Die)
- Sabbatean Frankists
- Jesuit Order
- B'nai B'rith
- Council on Foreign Relations
- Builderberg Group
- JFK speech
- Hegelian Dialectic
- The ninth Circle, but to name a few.

A councilor that Jaguar sent me to see told me "There is no such thing as coincidence"

I am sure with people aware they could come together and stop this Genocide thus bringing us into the age of Aquarius.  
20/20 vision.  
The Great Awakening

God bless you all.

Regards

Michael Henry (CLC)

3/3

## FIRST WITNESS STATEMENT

Evidence Bundle - Isolation.pdf

Marc Horn WhatDoTheyKnow.com relies on volunteers. Can you help?

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## WhatDoTheyKnow

## Full, accurate and complete disclosure of SARS-COV-2 virus records

Marc Horn made this Freedom of Information request to Privy Council Office

Privy Council Office **did not have** the information requested.

Marc Horn 25 July 2020

Delivered

Dear Privy Council Office,

Please provide a full, accurate and complete list of records held within your office, and or under your authority, describing the isolation of a SARS-COV-2 virus, directly taken from a symptomatic patient of COVID-19 where the sample was not first combined with any other source of genetic material (not limited but by way of example monkey kidney cells, aka vero cells, liver cancer cells) thereby eliminating contamination as a possible alternative source of sampling.

Please note isolation is used in the normally understood meaning of the word – the act of separating a thing from another. I am not referring, and hence not requesting, to isolation meaning the culture of something else, the performance of an amplification test (eg PCR test which only detect mRNA or DNA) or the sequencing of "something".

If any records match the above description and are available to the public elsewhere, please provide enough information so that I may identify and access each record with certainty (i.e. title, author(s), date, journal, and weblink or location where the public may access it).

I remind you full, accurate and complete disclosure is required.

Yours faithfully,

Marc Horn

PCO Enquiries Mailbox, Privy Council Office 25 July 2020

Thank you for your enquiry. If this matter is within the Privy Council Office remit, you should hear back from us within 15 working days.

# FIRST WITNESS STATEMENT

Marc Horn

For general information about the Privy Council and this Office please visit [\[1\]https://privycouncil.independent.gov.uk/](https://privycouncil.independent.gov.uk/)

--

Privy Council Office

Room G/04

1 Horse Guards Road

London SW1A 2HQ

0207 271 3292

[2]<http://privycouncil.independent.gov.uk>

References

Visible links

1. <https://privycouncil.independent.gov.uk/>
2. <http://privycouncil.independent.gov.uk/>

PCO Enquiries Mailbox, Privy Council Office 27 July 2020

Dear Marc Horn

I refer to your FOI request below to the Privy Council Office.

**Please note that the Privy Council Office is part of the Cabinet Office and your email has therefore been forwarded**

to [1][\[email address\]](#)

for reply.

Yours sincerely

Margaret Newell

Privy Council Office

Room G/04

1 Horse Guards Road

London SW1A 2HQ

0207 271 3292

[2]<http://privycouncil.independent.gov.uk>

[show quoted sections](#)

# FIRST WITNESS STATEMENT

Evidence Bundle - Isolation.pdf

Marc Horn [www.whatdotheyknow.com](http://www.whatdotheyknow.com) relies on volunteers. Can you help?

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WhatDoTheyKnow

## Full, accurate and complete disclosure of SARS-COV-2 virus records

Marc Horn made this Freedom of Information request to [House of Commons](#)

[House of Commons](#) **did not have** the information requested.

Marc Horn 25 July 2020

Delivered

Dear House of Commons,

Please provide a full, accurate and complete list of records held within your office, and or under your authority, describing the isolation of a SARS-COV-2 virus, directly taken from a symptomatic patient of COVID-19 where the sample was not first combined with any other source of genetic material (not limited but by way of example monkey kidney cells, aka vero cells, liver cancer cells) thereby eliminating contamination as a possible alternative source of sampling.

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I remind you full, accurate and complete disclosure is required.

Yours faithfully,

Marc Horn

FOI Commons, House of Commons 27 July 2020

1 Attachment

FOI Commons, House of Commons 12 August 2020.

1 Attachment

image001.png

16K [Download](#)

Dear Mr Horn,

Freedom of Information Request F20-347

Thank you for your request for information as copied below. You have asked for information describing the isolation of a SARS-COV-2 virus.

This information is not held by the House of Commons.

It may help you to understand that the House of Commons is an organisation that forms part of the UK's legislature. Our role it is to make and debate laws, scrutinise the work of the Government and debate the issues of the day. Whilst this may involve carrying out research into those issues, it does not extend to practical scientific investigation. You are seeking information which might instead be held by the Department of Health and Social Care or Public Health England, and therefore you may wish to consider submitting your request under the Freedom of Information Act to them. Contact details can be found at [1]<https://www.gov.uk/government/organisati...> and [2]<https://www.gov.uk/government/organisati...>

However, it may interest you to know that the House of Commons Library and the Parliamentary Office of Science and Technology have undertaken research on the Covid-19 outbreak, for the purpose of informing Members of Parliament. This has information on the subject in general which you may find helpful and is publicly available at

# FIRST WITNESS STATEMENT

Evidence Bundle - Isolation.pdf

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WhatDoTheyKnow

## Full, accurate and complete disclosure of SARS-COV-2 virus records

Marc Horn made this Freedom of Information request to [House of Lords](#)

The request was **successful**.

Marc Horn 25 July 2020

Delivered

Dear House of Lords,

Please provide a full, accurate and complete list of records held within your office, and or under your authority, describing the isolation of a SARS-COV-2 virus, directly taken from a symptomatic patient of COVID-19 where the sample was not first combined with any other source of genetic material (not limited but by way of example monkey kidney cells, aka vero cells, liver cancer cells) thereby eliminating contamination as a possible alternative source of sampling.

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If any records match the above description and are available to the public elsewhere, please provide enough information so that I may identify and access each record with certainty (i.e. title, author(s), date, journal, and weblink or location where the public may access it).

I remind you full, accurate and complete disclosure is required.

Yours faithfully,

Marc Horn

HL External Communications Office, House of Lords 25 July 2020

# FIRST WITNESS STATEMENT

## Marc Horn

Evidence Bundle - Isolation.pdf

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### References

#### Visible links

1. <http://www.parliament.uk/lordsHouse>
2. [mailto:\[email address\]](mailto:[email address])
3. <https://www.supremecourt.uk/>
4. <http://lordsappointments.independent.gov...>
5. <http://www.parliament.uk/lords>
6. <http://lords-subscriptions.parliament.uk/>
7. <https://twitter.com/UKHouseofLords>
8. <https://www.facebook.com/UKHouseofLords>
9. <http://www.youtube.com/user/ukhouseoflords>

HL FOI & Information Compliance, House of Lords 11 August 2020

### 1 Attachment

[FOI 3462 Response.pdf](#)

78K [Download](#) [View as HTML](#)

Dear Mr Horn,

Please find attached our response to your request (copied below) to the House of Lords Administration.

You may, if dissatisfied with the treatment of your request, ask the House of Lords to conduct an internal review. This should be addressed to [1][\[email address\]](#) and explain clearly the nature of your complaint in terms of compliance with the Freedom of Information Act 2000.

**List of records describing the isolation of a SARS-COV-2 virus****Request:**

Please provide a full, accurate and complete list of records held within your office, and or under your authority, describing the isolation of a SARS-COV-2 virus, directly taken from a symptomatic patient of COVID-19 where the sample was not first combined with any other source of genetic material (not limited but by way of example monkey kidney cells, aka vero cells, liver cancer cells) thereby eliminating contamination as a possible alternative source of sampling.

Please note isolation is used in the normally understood meaning of the word – the act of separating a thing from another. I am not referring, and hence not requesting, to isolation meaning the culture of something else, the performance of an amplification test (eg PCR test which only detect mRNA or DNA) or the sequencing of “something”.

If any records match the above description and are available to the public elsewhere, please provide enough information so that I may identify and access each record with certainty (i.e. title, author(s), date, journal, and weblink or location where the public may access it).

**Response:**

The Freedom of Information Act 2000 (“the FOIA”) provides a right of access, subject to specified exemptions, to recorded information held by a public authority. In the case of the House of Lords, the rights of access apply to recorded information held by the House of Lords Administration.

The House Administration does not hold any information matching the description set out in your request.

Outside the scope of your request, you may be interested in the House of Lords Science and Technology Committee’s current inquiry into the science of COVID-19. Information relating to the inquiry, including oral and written evidence that has been submitted to the Committee, is published on our website here:

<https://committees.parliament.uk/work/293/the-science-of-covid19/>

# FIRST WITNESS STATEMENT

Evidence Bundle - Isolation.pdf

Marc Horn [www.whatdotheyknow.com](http://www.whatdotheyknow.com) relies on volunteers. Can you help?

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WhatDoTheyKnow

## Full, accurate and complete disclosure of SARS-COV-2 virus records

Marc Horn made this Freedom of Information request to [Prime Minister's Office](#)

[Prime Minister's Office](#) **did not have** the information requested.

Marc Horn 25 July 2020

Delivered

Dear Prime Minister's Office,

Please provide a full, accurate and complete list of records held within your office, and or under your authority, describing the isolation of a SARS-COV-2 virus, directly taken from a symptomatic patient of COVID-19 where the sample was not first combined with any other source of genetic material (not limited but by way of example monkey kidney cells, aka vero cells, liver cancer cells) thereby eliminating contamination as a possible alternative source of sampling.

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If any records match the above description and are available to the public elsewhere, please provide enough information so that I may identify and access each record with certainty (i.e. title, author(s), date, journal, and weblink or location where the public may access it).

I remind you full, accurate and complete disclosure is required.

Yours faithfully,

Marc Horn

Marc Horn 22 August 2020

Delivered

Dear Prime Minister's Office,

## FIRST WITNESS STATEMENT

Evidence Bundle - Isolation.pdf

You are in breach of your legal duties and obligations of providing the required information by the 21 August 2020 to allow full accountability of your actions to the public.

Marc Horn

Please immediately correct your breach within the next 3 working days.

Yours faithfully,

Marc Horn

### Trevor Allport left an annotation (22 August 2020)

They have not got the information because we do not have a new virus. If the standard documents do not exist then we must assume that even the virus itself is nonsense. We need to make a list of the people to hold to account for what amounts to terrorism and crimes against humanity.

### FOI Team Mailbox, Prime Minister's Office 22 August 2020

Dear Mr Horn

You request - FOI2020/10121 - was replied to on the 18/8/2020 - on behalf of the Cabinet Office as a whole.

Regards

FOI Team

Room 405

70 Whitehall,

London, SW1A 2AS

E-mail -[1][Number 10 request email]

[show quoted sections](#)

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# FIRST WITNESS STATEMENT

Evidence Bundle - Isolation.pdf

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## WhatDoTheyKnow

# Full, accurate and complete disclosure of SARS-COV-2 virus isolation records

Marc Horn made this Freedom of Information request to [Cabinet Office](#)

The request was **partially successful**.

Marc Horn 26 July 2020

Delivered

Dear Cabinet Office,

Please provide a full, accurate and complete list of records held within your office, and or under your authority, describing the isolation of a SARS-COV-2 virus, directly taken from a symptomatic patient of COVID-19 where the sample was not first combined with any other source of genetic material (not limited but by way of example monkey kidney cells, aka vero cells, liver cancer cells) thereby eliminating contamination as a possible alternative source of sampling.

Please note isolation is used in the normally understood meaning of the word – the act of separating a thing from another. I am not referring, and hence not requesting, to isolation meaning the culture of something else, the performance of an amplification test (eg PCR test which only detect mRNA or DNA) or the sequencing of “something”.

If any records match the above description and are available to the public elsewhere, please provide enough information so that I may identify and access each record with certainty (i.e. title, author(s), date, journal, and weblink or location where the public may access it).

I remind you full, accurate and complete disclosure is required.

Yours faithfully,

Marc Horn

FOI Team Mailbox, Cabinet Office 27 July 2020

CABINET OFFICE REFERENCE: FOI2020/10121

# FIRST WITNESS STATEMENT

Evidence Bundle - Isolation.pdf

Dear MARC HORN  
Marc Horn

Thank you for your request for information. Your request was received on 25/7/2020 and we are considering if it is appropriate to deal with under the terms of the Freedom of Information Act 2000.

This email is just a short acknowledgement of your request.

When corresponding with the Cabinet Office, you may wish to be aware of how we treat your personal information. This is set out in our personal information charter, at the following link: [1]<https://www.gov.uk/government/organisati...>

If you have any queries about this email, please contact the FOI team. Please remember to quote the reference number above in any future communications.

Yours sincerely,

Knowledge and Information Management Unit

Cabinet Office

E: [2][Cabinet Office request email]

References

Visible links

1. <https://www.gov.uk/government/organisati...>
2. [mailto:\[email address\]](mailto:[email address])

FOI Team Mailbox, Cabinet Office 18 August 2020

## 1 Attachment

[FOI2020.10121 Reply.pdf](#)

108K [Download](#) [View as HTML](#)

Please find attached the reply to your FOI request

Regards

Marc Horn

 Cabinet Office

Room 405  
70 Whitehall  
London, SW1A 2AS

foi-team@cabinetoffice.gov.uk  
www.cabinetoffice.gov.uk

Marc Horn

By email :[Request-679848-f291cd75@whatdotheyknow.com](mailto:Request-679848-f291cd75@whatdotheyknow.com)

FOI Reference: FOI2020/10121

18/08/2020

Dear Marc Horn

I refer to your request where you asked:

*"Freedom of Information request - Full, accurate and complete disclosure of SARS-COV-2 virus isolation records"*

*Dear Cabinet Office,*

*Please provide a full, accurate and complete list of records held within your office, and or under your authority, describing the isolation of a SARS-COV-2 virus, directly taken from a symptomatic patient of COVID-19 where the sample was not first combined with any other source of genetic material (not limited but by way of example monkey kidney cells, aka vero cells, liver cancer cells) thereby eliminating contamination as a possible alternative source of sampling.*

*Please note isolation is used in the normally understood meaning of the word – the act of separating a thing from another. I am not referring, and hence not requesting, to isolation meaning the culture of something else, the performance of an amplification test (eg PCR test which only detect mRNA or DNA) or the sequencing of "something". If any records match the above description and are available to the public elsewhere,*

*please provide enough information so that I may identify and access each record with certainty (i.e. title, author(s), date, journal, and weblink or location where the public may access it).*

*I remind you full, accurate and complete disclosure is required."*

I am writing to advise you that following a search of our paper and electronic records, I have established that the information you requested is not held by the Cabinet Office.

You may wish to try contacting Public Health England, who may be able to help you with your request. at [FOI@phe.gov.uk](mailto:FOI@phe.gov.uk)

With respect to your request we have been advised on the following:

Coronavirus Disease, or Covid-19, is caused by a new virus called SARS-CoV-2. Most infectious diseases are caused by viruses, bacteria or fungi. Some bacteria or fungi have the capacity to grow on their own in isolation, for example in colonies on a petri dish. Viruses are different in that they are what we call "obligate pathogens" – that is, they cannot survive or reproduce without infecting a host. An explainer of these different types of pathogen (disease causing agents) can be found from *BMC Biology* here: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5648414/>

For some diseases, it is possible to establish causation between a microorganism and a disease by isolating the pathogen from a patient, growing it in pure culture and reintroducing it to a healthy organism. These are known as "Koch's postulates", and were developed in 1884. However, as our understanding of disease and different disease-causing agents has advanced, these are no longer the method for determining disease causation. It has long been known that viral diseases cannot be identified in this way as viruses cannot be grown in 'pure culture'. When a patient is tested for a viral illness, this is normally done by looking for the presence of antigens, or viral genetic code in a host with molecular biology techniques.

If you have any queries about this letter, please contact the FOI Team quoting the reference number above.

If you are unhappy with the service you have received in relation to your request or wish to request an internal review, you should write to:

Eirian Walsh Atkins  
Cabinet Office  
70 Whitehall  
London  
SW1A 2AS

email: [foi-team@cabinetoffice.gov.uk](mailto:foi-team@cabinetoffice.gov.uk)

You should note that the Cabinet Office will not normally accept an application for internal review if it is received more than two months after the date that the reply was issued. If you are not content with the outcome of your internal review, you may apply directly to the Information Commissioner for a decision. Generally, the Commissioner cannot make a decision unless you have exhausted the complaints procedure provided by Cabinet Office. The Information Commissioner can be contacted at:

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

*Yours sincerely*

A handwritten signature in black ink, appearing to read 'Marc Horn', written over a light blue horizontal line.

*FOI Team  
Cabinet Office*

# FIRST WITNESS STATEMENT

Evidence Bundle - Isolation.pdf

Marc Horn [www.whatdotheyknow.com](https://www.whatdotheyknow.com) relies on volunteers. Can you help?

Hello! We have an important message for visitors outside United Kingdom

Printed from [https://www.whatdotheyknow.com/request/full\\_accurate\\_and\\_complete\\_discl\\_5](https://www.whatdotheyknow.com/request/full_accurate_and_complete_discl_5) on November 01, 2020 09:45

WhatDoTheyKnow

## Full, accurate and complete disclosure of SARS-COV-2 virus records

Marc Horn made this Freedom of Information request to [Department of Health and Social Care](#)

[Department of Health and Social Care](#) **did not have** the information requested.

Marc Horn 25 July 2020

Delivered

Dear Department of Health and Social Care,

Please provide a full, accurate and complete list of records held within your office, and or under your authority, describing the isolation of a SARS-COV-2 virus, directly taken from a symptomatic patient of COVID-19 where the sample was not first combined with any other source of genetic material (not limited but by way of example monkey kidney cells, aka vero cells, liver cancer cells) thereby eliminating contamination as a possible alternative source of sampling.

Please note isolation is used in the normally understood meaning of the word – the act of separating a thing from another. I am not referring, and hence not requesting, to isolation meaning the culture of something else, the performance of an amplification test (eg PCR test which only detect mRNA or DNA) or the sequencing of "something".

If any records match the above description and are available to the public elsewhere, please provide enough information so that I may identify and access each record with certainty (i.e. title, author(s), date, journal, and weblink or location where the public may access it).

I remind you full, accurate and complete disclosure is required.

Yours faithfully,

Marc Horn

Department of Health and Social Care 27 July 2020

This is an acknowledgement - please do not reply to this email.

# FIRST WITNESS STATEMENT

References  
Marc Horn

Evidence Bundle - Isolation.pdf

## Visible links

1. <https://www.gov.uk/>
2. <https://www.gov.uk/government/organisati...>
3. <https://www.nhs.uk/>
4. <https://111.nhs.uk/covid-19/>
5. <https://www.gov.uk/coronavirus-support-f...>
6. <https://www.nhsprofessionals.nhs.uk/>
7. <http://www.england.nhs.uk/coronavirus/re...>
8. <https://www.hee.nhs.uk/news-blogs-events...>
9. <https://www.hee.nhs.uk/news-blogs-events...>
10. <https://www.goodsamapp.org/nhs/>
11. <https://www.gov.uk/government/organisati...>

Marc Horn 22 August 2020

Delivered

Dear Department of Health and Social Care,

You are in breach of your legal duties and obligations of providing the required information by the 21 August 2020 to allow full accountability of your actions to the public.

Please immediately correct your breach within the next 3 working days.

Yours faithfully,

Marc Horn

Department of Health and Social Care 24 August 2020

1 Attachment

[FOI 1243364 Horn.pdf](#)

138K [Download](#) [View as HTML](#)

Dear Mr Horn,

Please find attached the Department of Health and Social Care's response to your recent FOI request (our ref: FOI-1243364) (Today being the 20th working day)

Mr Horn

  
Department  
of Health &  
Social Care

Freedom of Information Team  
Department of Health and Social Care  
39 Victoria Street  
London  
SW1H 0EU

[www.gov.uk/dhsc](http://www.gov.uk/dhsc)

Mr Horn  
[request-679704-  
a9f26e86@whatdotheyknow.com](mailto:request-679704-a9f26e86@whatdotheyknow.com)

24 August 2020

Dear Mr Horn,

**Freedom of Information Request Reference FOI-1243364**

Thank you for your request dated 25 July 2020 in which you asked the Department of Health and Social Care (DHSC):

***Subject: Freedom of Information request - Full, accurate and complete disclosure of SARS-COV-2 virus records***

***Please provide a full, accurate and complete list of records held within your office, and or under your authority, describing the isolation of a SARS-COV-2 virus, directly taken from a symptomatic patient of COVID-19 where the sample was not first combined with any other source of genetic material (not limited but by way of example monkey kidney cells, aka vero cells, liver cancer cells) thereby eliminating contamination as a possible alternative source of sampling.***

***Please note isolation is used in the normally understood meaning of the word – the act of separating a thing from another. I am not referring, and hence not requesting, to isolation meaning the culture of something else, the performance of an amplification test (eg PCR test which only detect mRNA or DNA) or the sequencing of “something”.***

***If any records match the above description and are available to the public elsewhere, please provide enough information so that I may identify and access each record with certainty (i.e. title, author(s), date, journal, and weblink or location where the public may access it). I remind you full, accurate and complete disclosure is required.***

Your request has been handled under the Freedom of Information Act (FOIA).

DHSC does not hold information on the isolation of a SARS-COV-2 virus.

However, outside of the scope of the FOIA, and on a discretionary basis, the following information has been advised to us, which may be of interest. Most infectious diseases are caused by viruses, bacteria or fungi. Some bacteria or fungi have the capacity to grow on their own in isolation, for example in colonies on a petri dish. Viruses are different in that they are what we call "obligate pathogens" – that is, they cannot survive or reproduce without infecting a host. An explainer of these different types of pathogen (disease causing agents) can be found from BMC Biology here: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5648414/>

For some diseases, it is possible to establish causation between a microorganism and a disease by isolating the pathogen from a patient, growing it in pure culture and reintroducing it to a healthy

organism. These are known as "Koch's postulates" and were developed in 1884. However, as our understanding of disease and different disease-causing agents has advanced, these are no longer the method for determining disease causation. It has long been known that viral diseases cannot be identified in this way as viruses cannot be grown in 'pure culture'. When a patient is tested for a viral illness, this is normally done by looking for the presence of antigens, or viral genetic code in a host with molecular biology techniques.

If you have any queries in relation to the above discretionary information, we suggest that you may wish to contact the Government Office for Science (Go-Science). FOI requests may be submitted to Go-Science at [contact@go-science.gov.uk](mailto:contact@go-science.gov.uk).

If you are not satisfied with the handling of your request, you have the right to appeal by asking for an internal review. This should be submitted within two months of the date of this letter and sent to [FreedomOfInformation@dhsc.gov.uk](mailto:FreedomOfInformation@dhsc.gov.uk), or to the address at the top of this letter.

Please remember to quote the reference number above in any future communication.

If you are not content with the outcome of your internal review, you may complain directly to the Information Commissioner's Office (ICO). Generally, the ICO cannot make a decision unless you have already appealed our original response and received our internal review decision. You should raise your concerns with the ICO within three months of your last meaningful contact with us.

The ICO can be contacted at:

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

<https://ico.org.uk/concerns/>

Yours sincerely,

Dorothy Crowe

Freedom of Information Officer  
E: [freedomofinformation@dhsc.gov.uk](mailto:freedomofinformation@dhsc.gov.uk)

# FIRST WITNESS STATEMENT

Yours sincerely,  
Marc Horn

Dorothy Crowe

Freedom of Information team  
Department of Health and Social Care

[show quoted sections](#)

Evidence Bundle - Isolation.pdf

Marc Horn 25 August 2020

Delivered

Dear Department of Health and Social Care,

Please pass this on to the person who conducts Freedom of Information reviews.

I am writing to request an internal review of Department of Health and Social Care's handling of my FOI request 'Full, accurate and complete disclosure of SARS-COV-2 virus records'.

Based upon your previous responses to my FOI:

"...it has long been known that viral diseases cannot be identified in this way as viruses cannot be grown in 'pure culture'. When a patient is tested for a viral illness, this is normally done by looking for the presence of antigens, or viral genetic code in a host with molecular biology techniques"

Accordingly please provide a full, accurate and complete list of records held within your office, and / or under your authority, supporting the following claims;

- 1 - Which symptoms uniquely identify COVID-19?
- 2 - Which viral antigens uniquely identify COVID-19?
- 3 - Which viral genetic code uniquely identifies SARS-Cov-2?
- 4 - What is the accuracy of the testing method for unique COVID-19 antigens upon which those governing rely upon, with supporting scientific verification?
- 5 - What is the accuracy of the testing method for unique SARS-Cov-2 genetic code upon which those governing rely upon, with supporting scientific verification?
- 6 - <https://www.gov.uk/guidance/high-consequ...>

shows updates detailing the explanation of the removal of COVID-19 from the HCID list was on the version dated 21 March 2019. However there is no link to the source document.

Please provide source document from "the 4 nations public health HCID group..." that supported the decision that " As of 19 March 2020, COVID-19 is no longer considered to be a high consequence infectious disease (HCID) in the UK."

There is plenty of assumptions and presumptions, however there is no definitive evidence requested in my FOI request. In order to make legislation presumptions and assumptions is a breach of duty of care, and can even be gross negligence. Legislature relies upon expert opinion, and must be able to show proportionality and for the common good, failing which the legislation is null and void being against logic and reason. Accordingly you are required to provide the records upon which PHE relies upon to show it has followed its lawful obligations, and that means you are required to show evidence not based upon the opinions of others assumptions and presumptions resulting from your response to my original FOI.

## FIRST WITNESS STATEMENT

Evidence Bundle - Isolation.pdf

Marc Horn

A full history of my FOI request and all correspondence is available on the Internet at this address:

<https://www.whatdotheyknow.com/request/f...>

Yours faithfully,

Marc Horn

Department of Health and Social Care 25 August 2020

This is an acknowledgement - please do not reply to this email.

Thank you for contacting the Department of Health and Social Care.

We are currently experiencing high volumes of enquiries and we are focusing our resources on the Coronavirus (COVID-19) response.

The answers to many questions, including the latest information on COVID-19, can be found on [1]GOV.UK, the [2]Department of Health and Social Care website or by visiting the [3]NHS website. We may not respond to you if the answer to your enquiry can be found on either of these websites. Where a reply is appropriate, we aim to send a response within 18 working days, or 20 working days if your query is a Freedom of Information request or complaint.

If you are experiencing symptoms related to COVID-19, please visit [4]111.nhs.uk or telephone your GP surgery immediately for further advice. Do not go to a GP surgery, pharmacy or hospital directly.

If your organisation can offer support to help with the response to coronavirus, including the supply of personal protective equipment, the Government has set up an [5]online hub to compile and respond to all offers.

If you are a clinician looking to support the NHS, please visit the [6]NHS Professionals website for further information.

If you are a clinician who has retired within the last 6 years and would like more information on how to apply for the temporary register, please visit the [7]NHS England website for further information.

If you are a student looking to join the NHS, please visit the HEE website for detailed guidance for [8]nurses and [9]doctors respectively.

If you are seeking to offer your time to/volunteer for the NHS, please visit [10]this website for more information.

The Department of Health and Social Care does not process complaints about the NHS or social services. If you wish to make a complaint about a

# FIRST WITNESS STATEMENT

Evidence Bundle - Isolation.pdf

Marc Horn

healthcare professional, an NHS organisation or a social care provider,  
please visit the [11]Complaints Procedure page on GOV.UK.

You can find out more about the Department's commitments from our Personal Information

Charter <https://www.gov.uk/government/organisati...>

This e-mail and any attachments is intended only for the attention of the addressee(s). Its unauthorised use, disclosure, storage or copying is not permitted. If you are not the intended recipient, please destroy all copies and inform the sender by return e-mail. Any views expressed in this message are not necessarily those of the Department of Health and Social Care. Please note: Incoming and outgoing email messages are routinely monitored for compliance with our policy on the use of electronic communications.

## References

### Visible links

1. <https://www.gov.uk/>
2. <https://www.gov.uk/government/organisati...>
3. <https://www.nhs.uk/>
4. <https://111.nhs.uk/covid-19/>
5. <https://www.gov.uk/coronavirus-support-f...>
6. <https://www.nhsprofessionals.nhs.uk/>
7. <http://www.england.nhs.uk/coronavirus/re...>
8. <https://www.hee.nhs.uk/news-blogs-events...>
9. <https://www.hee.nhs.uk/news-blogs-events...>
10. <https://www.goodsamapp.org/nhs/>
11. <https://www.gov.uk/government/organisati...>

Marc Horn 22 September 2020

Delivered

Dear Department of Health and Social Care,

You are in breach of your legal duties and obligations of providing the required information by the 14 September 2020 to allow full accountability of your actions to the public.

Please immediately correct your breach within the next 3 working days.

Yours faithfully,

Marc Horn

2 Attachments

image002.jpg

3K [Download](#)

IR 1243364.pdf

126K [Download](#) [View as HTML](#)

Dear Mr Horn,

I apologise for the length of time it has taken to carry out your requested internal review of FOI-1243364.

The review is now complete. Please see the attached letter for the outcome.

Yours sincerely,

Charlene Carter

Charlene Carter

Freedom of Information Casework Manager

Department of Health and Social Care

39 Victoria Street, London SW1H 0EU

This e-mail and any attachments is intended only for the attention of the addressee(s). Its unauthorised use, disclosure, storage or copying is not permitted. If you are not the intended recipient, please destroy all copies and inform the sender by return e-mail. Any views expressed in this message are not necessarily those of the Department of Health and Social

Marc Horn

  
Department  
of Health &  
Social Care

Freedom of Information Team  
Department of Health and Social Care  
39 Victoria Street  
London SW1H 0EU

[www.gov.uk/dhsc](http://www.gov.uk/dhsc)

Mr Marc Horn  
[request-679704-  
af26e86@whatdotheyknow.com](mailto:request-679704-af26e86@whatdotheyknow.com)

28 October 2020

Annex A: DHSC's response to initial request dated 24 August 2020  
Annex B: Request for internal review dated 25 August 2020

Dear Mr Horn,

**FREEDOM OF INFORMATION ACT (FOIA): INTERNAL REVIEW  
CASE REFERENCE IR 1243364**

You originally wrote to the Department of Health and Social Care (DHSC) on 25 July requesting information about the SARS-CoV-2 virus. We responded to you on 24 August (our ref: FOI-1243364), stating that we do not hold the requested information. A copy of our response, including the full text of your request, is at Annex A.

You subsequently emailed DHSC on 25 August requesting an internal review into the handling of your original request. A copy of your email is at Annex B.

The purpose of an internal review is to assess how your FOI request was handled in the first instance and to determine whether the decision given to you was correct. This is an independent review as I was not involved in the original decision. I apologise for the delay in responding, which I appreciate has fallen short of expectations.

I have undertaken discussions with the team that has responsibility for your request, and we have taken the opportunity to consider it again.

**Conclusion**

After careful consideration of the subject matter, I have concluded that the response you received was compliant with the requirements of the FOIA and I uphold DHSC's statement that the Department does not hold the requested information.

I note that you were provided with information outside of the scope of the FOIA in order to be as helpful as possible. I also note that your subsequent questions are being dealt with separately.

The review is now complete.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner (ICO) for a decision. The ICO can be contacted at:

FIRST WITNESS STATEMENT  
Marc Horn

Evidence Bundle - Isolation.pdf

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

<https://ico.org.uk/concerns>

Yours sincerely,

Charlene Carter  
Casework Manager  
Freedom of Information Team  
[FreedomofInformation@dhsc.gov.uk](mailto:FreedomofInformation@dhsc.gov.uk)

Marc Horn [www.whatdotheyknow.com](https://www.whatdotheyknow.com) relies on volunteers. Can you help?

Hello! We have an important message for visitors outside United Kingdom

Printed from [https://www.whatdotheyknow.com/request/full\\_accurate\\_and\\_complete\\_disclosure\\_10](https://www.whatdotheyknow.com/request/full_accurate_and_complete_disclosure_10) on November 01, 2020 09:32

WhatDoTheyKnow

## Full, accurate and complete disclosure of SARS-COV-2 virus isolation records

Marc Horn made this Freedom of Information request to [Public Health England](#)

The request was **successful**.

Marc Horn 25 July 2020

Delivered

Dear Public Health England,

Please provide a full, accurate and complete list of records held within your office, and or under your authority, describing the isolation of a SARS-COV-2 virus, directly taken from a symptomatic patient of COVID-19 where the sample was not first combined with any other source of genetic material (not limited but by way of example monkey kidney cells, aka vero cells, liver cancer cells) thereby eliminating contamination as a possible alternative source of sampling.

Please note isolation is used in the normally understood meaning of the word – the act of separating a thing from another. I am not referring, and hence not requesting, to isolation meaning the culture of something else, the performance of an amplification test (eg PCR test which only detect mRNA or DNA) or the sequencing of "something".

If any records match the above description and are available to the public elsewhere, please provide enough information so that I may identify and access each record with certainty (i.e. title, author(s), date, journal, and weblink or location where the public may access it).

I remind you full, accurate and complete disclosure is required.

Yours faithfully,

Marc Horn

FOI, Public Health England 29 July 2020

Dear Marc Horn

## FIRST WITNESS STATEMENT

Evidence Bundle - Isolation.pdf

Marc Horn

We acknowledge receipt of your email and request for information, which will be treated as a request for information under statutory access legislation.

Please note that requests under the Freedom of Information Act and the Environmental Information Regulations (EIRs) will receive a response within 20 working days from the day following the date of receipt of your request.

If the request is for your personal data, your request has been handled as a data subject access request (SAR) under Article 15 of the General Data Protection Regulation (GDPR), then we will respond within one month of the receipt of the request.

Public Health England (PHE) is responsible for providing guidance and advice to government and front-line services for all aspects of public health. It is a designated Category 1 responder organisation under the Civil Contingency Act and this specifically includes the COVID-19 response, providing clinical expertise and wider public health advice and guidance across national and local government, the NHS and third sector. As such, you may experience delays when making statutory information access requests during the pandemic.

We will aim to address all requests promptly and within the required response timeframes. However when we are unable to meet the response timeframe we will keep requesters updated on a revised expected timescale for a response to their request. The Information Commissioner recognises this position in its recent guidance, see link: <https://ico.org.uk/global/data-protectio...>

FOI Team  
Public Accountability Unit  
Public Health England  
[Public Health England request email]  
[www.gov.uk/phe](http://www.gov.uk/phe) Follow us on Twitter @PHE uk

[show quoted sections](#)

FOI, Public Health England 20 August 2020

### 1 Attachment

878 FOI List of records describing isolation of SARS COV 2.pdf

217K [Download](#) [View as HTML](#)

Dear Marc Horn

Please find attached Public Health England's response to your request.

Kind Regards  
FOI Team  
Public Accountability Unit  
Public Health England  
[Public Health England request email]  
[www.gov.uk/phe](http://www.gov.uk/phe) Follow us on Twitter @PHE uk

Marc Horn


  
Public Health  
England

Protecting and improving the nation's health

Public Accountability Unit  
Wellington House  
133-155 Waterloo Road  
London SE1 8UG

T 020 8327 6920

[www.gov.uk/phe](http://www.gov.uk/phe)**By email**[request-679711-9694b4f1@whatdotheyknow.com](mailto:request-679711-9694b4f1@whatdotheyknow.com)

Our ref: 25/07/hf/878

20 August 2020

Dear Marc Horn,

**Re: Full, accurate and complete disclosure of SARS-COV-2 virus isolation records**

Thank you for your email dated 25 July 2020. In accordance with Section 1(1)(a) of the Freedom of Information Act 2000 (the Act), I can confirm that Public Health England (PHE) does/does not the information you have specified. I have set out PHE's response to your questions below.

**Your Request**

*Please provide a full, accurate and complete list of records held within your office, and or under your authority, describing the isolation of a SARS-COV-2 virus, directly taken from a symptomatic patient of COVID-19 where the sample was not first combined with any other source of genetic material (not limited but by way of example monkey kidney cells, aka vero cells, liver cancer cells) thereby eliminating contamination as a possible alternative source of sampling.*

*Please note isolation is used in the normally understood meaning of the word – the act of separating a thing from another. I am not referring, and hence not requesting, to isolation meaning the culture of something else, the performance of an amplification test (eg PCR test which only detect mRNA or DNA) or the sequencing of "something".*

*If any records match the above description and are available to the public elsewhere, please provide enough information so that I may identify and access each record with certainty (i.e. title, author(s), date, journal, and weblink or location where the public may access it).*

**Response**

PHE can confirm it does not hold information in the way suggested by your request.

Under section 16 of the Act, public authorities have a duty to provide advice and assistance. I have signposted you to the below links which contain information on taking COVID-19 swabs.

<https://www.gov.uk/government/publications/covid-19-guidance-for-taking-swab-samples>

<https://www.gov.uk/government/publications/types-and-uses-of-coronavirus-covid-19-tests/types-and-uses-of-coronavirus-covid-19-tests>

Additionally, the below publication contains some information on virus isolation:

<https://www.eurosurveillance.org/content/10.2807/1560-7917.ES.2020.25.32.2001483>

If you have any queries regarding the information that has been supplied to you, please refer your query to in writing in the first instance. If you remain dissatisfied and would like to request an internal review, then please contact us at the address above or by emailing [foi@phe.gov.uk](mailto:foi@phe.gov.uk).

Please note that you have the right to an independent review by the Information Commissioner's Office if a complaint cannot be resolved through the PHE complaints procedure. The Information Commissioner's Office can be contacted by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Yours sincerely,  
FOI Team



PRIVATE AND CONFIDENTIAL

Mr Michael Furlong  
 FULL ADDRESS  
 29 Karonga Road  
 Fazakerley  
 Liverpool  
 L10 9LN

16 March 2021

Dear Michael,

I have been made aware of communications that you are continuing to send to Thierry Bollore, Chief Executive Officer Jaguar Land Rover, in relation to covid 19 and the wearing of face masks.

You were dismissed from the Company on 12 November 2020 and the appeals process has been concluded. I am aware that you have submitted an Employment Tribunal claim and your claim is now being managed by our in house legal team.

I must inform you that it is not appropriate for you to continue to contact the Company directly when we have legal representation in place, therefore please do not send any further direct correspondence to Thierry Bollore or any other employees of Jaguar Land Rover. All future correspondence should be directed to our legal representatives at [emplit@jaguarlandrover.com](mailto:emplit@jaguarlandrover.com).

Yours Sincerely

Stephanie Stephenson

Head of HR  
 Halewood Operations

Jaguar Land Rover Limited  
Halewood  
Liverpool  
L24 9BJ

29 Karonga Road  
Fazakerley  
Liverpool  
L10 9LN

Sarah McCarthy,

BN 2016 3484 4GB

I acknowledge your email dated 19 March 2021 8:37am, however my contract was with JAGUAR LAND ROVER LIMITED. Please note any correspondence I receive from third parties acting on your behalf will be charged at £1000.00, ONE THOUSAND POUNDS AND ZERO PENCE GBP, per letter/email.

Thank you.

With Sincerity and Honour,

*Michael Henry Furlong*

:Michael-Henry:Furlong

Authorised representative for MICHAEL FURLONG (Lien Claimant)

Responsible Party and holder in due course, Beneficiary.

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Thierry Bollore (C.E.O)  
Jaguar Land Rover Limited  
Abbey Road  
Whitley  
Coventry  
CV3 4LF

Return address:  
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Fazakerley  
Liverpool  
L10 9LN

Date 08/03/2021



**NOTICE TO AGENT IS NOTICE TO PRINCIPAL  
NOTICE TO PRINCIPAL IS NOTICE TO AGENT**

Dear Thierry,

I received notification of a tribunal which informed me to send you a breakdown and reasoning for my costs, they are as follows:

|  |            |
|--|------------|
| Contract termination = 12 years x £37,000 = £444,000 |            |
| Damages  | = £26,000  |
| Total  | = £470,000 |

This figure is subject to Default conditions by Dishonour.

The non-response of NOTICE OF FAULT & OPPORTUNITY TO CURE dated 05/02/2021

Has now expired the total is now x3.

After 90 days of non-rebuttal from receipt of the Affidavit received on 04/01/2021, Exemplary charges will apply.

Yours with Sincerity and Honour,

*Michael-Henry Furlong*

By: Michael Furlong.

Authorised representative for MICHAEL FURLONG

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Non-Assumpsit Errors and Omissions Excepted

Disciplinary Allegation meeting

Minutes

12/11/2020

JH: Introduction, Andy Evans, Steve McGravey. Confirmation for pack for Steve McGravey.

Can you hear me ok?

MF: yes

JH: just handing pack to Steve, on that basis do we want to make a start on the meeting?

MF: Yes, sure.

AE: Good afternoon Michael, its Andy Evans here, is it Mike or Michael? are you ok with Steve?

MF: you ok Steve?

SMcG: Yeah.

MF: Yes, we are ok to proceed

AE: Audio recordings are not permitted, you are here on charges of Gross Misconduct, which are...Serious disregard for company safety precautions, refusal to comply with a reasonable management instruction and circulation of inappropriate material, which could result in disciplinary action up to and including dismissal. Janet will be taking notes, they are not verbatim and will be available to all parties. Adjournments can be taken at any time.

MF: ok, Can I just state for the record Andy, that I reserve all my rights.

AE: All what rights?

MF: All my rights, I reserve them all. For the minutes if you don't mind?

AE: Just for clarification, I'm confused as to what you are asking for mate.

MF: I am asking for the right for me to reserve all my rights to be documented on the minutes, if that's Okay?

JH: So, you want me to make a statement on the minutes of you saying...

MF: That I reserve all my rights Janet, please.

AE: Yes, Janet will do that.

MF: Thank you.

AE: Err... What I will do is....Err, at some point in time, I will be taking an adjournment after you have had an opportunity to speak and go through some of the stuff, yeah?

MF: Yes.

AE : you can take an adjournment any time

AE: Have you any questions on the structure of the meeting mate?

MF: Not really no, its just a lot going on and I highlighted a few things to management, and there is new evidence coming about regarding the whole situation, and I feel strongly about this situation in work to the fact that it is detrimental to people's health.

AE: Ok, so Mike, sorry I don't mean to talk over you.

MF No problem.

AE: What I will do is, have you any questions on the structure of the meeting that I have just explained?

MF: Not really, I'm just a bit disappointed that my correspondence has gone down as malicious and vexatious, I am bringing things to light and it is a very serious situation.

AE: Listen to what I am asking, you will have a chance to go through all that stuff shortly, all I am asking is concerning the structure of the meeting the reason you are here, have you any questions about that?

MF: No

AE: Could I clarify why you are not attending in person today mike?

MF: Because there is a mask mandate.

AE: Yes, everybody must wear a face covering.

MF: I have an exemption, but work won't accept it for some reason Andy.

AE: ok

MF: I don't have a problem anywhere else.

AE: ok, have you received all the documents in regard to this meeting

MF: I received a pack from Janet Harkin.

AE: What time did you receive that?

MF: It was in the afternoon post; I think it was about 1.30pm

AE: So, you have had an opportunity to look through it?

MF: yes

AE: Have you anything you would like to raise in relation to them?

MF: No, I will just chirp in as we go along if that is, ok? It is a very serious situation we find ourselves in Andy so there is quite a lot of information.

AE: Yeah, ok. Have you got anything you would like to ask?

MF: No, I will just answer your questions, if that's alright?

JH: You have not had an opportunity to speak with your Union rep.

MF: Yes, well doing this remotely is a little awkward.

JH: Would you like a moment to talk to Steve before we commence?

MF: Do you know what Jan, if you do not mind me having a quick phone call, if that's ok?

JH: Ok, well you are on loudspeaker and we are going to leave the room,

MF: Janet, I would much prefer if I could ring him, if that is ok?

JH: That is fine you can call him, what we will do is I will end this now and Steve can call you.

MF: Thank you very much. (meeting Adjourned)

Reconvened after 20min approx.

MF: Hi

JH: Hi we are back in the room.

MF: Thank you for that Janet.

JH: No problem.

AE: So, we have asked if you have had an opportunity to view the documents and if you had any points to make and you have said no.

MF: Andy, my position is very clear, I have an exemption and according to the government website no one has the right to ask me about it everyone on the line is aware I have anxiety now, I believe there has been a breach of data protection, and I believe the equality's act has been violated.

AE: Ok, so that is a statement of fact on your belief yeah?

MF: Yeah

AE: ok we will get to that

JH: so, you say you have an exemption, and no one can ask you about it?

MF: Well according to the government website that is a fact yes.

JH: and you say you believe there has been a breach of data protection?

MF: well now everybody knows I have anxiety because I have been suspended.

AE: Who told them that?

MF: What?

AE: Who told you that? Everything we have spoken about has been in confidence.

MF: Well, they are going to know, aren't they? they all seen me get pulled off the line by Richard Mann.

AE: So are you stating fact.

MF: No, I am just surmising.

AE: You are guessing that people know?

MF: Pardon?

AE: Are you Guessing that people know?

MF: Obviously, people talk.

AE: so, you're surmising.

MF: yes.

AE: ok let me be clear, everything you have discussed as part of this investigation is confidential ok

MF: ok

AE: what is your exemption?

MF: They cause me anxiety and stress; it starves me of oxygen, it restricts my oxygen which in turn affects my performance on the job.

AE: Are you talking specifically about a mask?

MF: Pardon?

AE: Are you talking specifically in relation to a mask?

MF: Well, I tried a facemask and I nearly passed out. I emailed Simon Mansfield about it and I got a very polite reply off him but it didn't really answer any questions for me.

AE: In terms of the exemption that you are talking about?

MF: Pardon?

AE: is it specifically relating to a mask or any face covering?

MF: Any face covering that restricts my airflow

AE: Ok so a visor doesn't restrict your airflow

MF: It does it makes me dry, it dries me out and its cumbersome on the job, I was actually on 2 jobs Andy and...

JH: Can I stop you there, you said the visor and did you say dries you out?

MF: It dries my nose out yeah, it restricts your oxygen you are breathing back in Co2.

JH: ok

MF: you are rebreathing Co2 it dries your nose out

AE: In a previous statement you say you are happy wearing a glasses type mask.

MF: Well, there is actually 2 jobs I work on Andy, 1 is not practical to wear the visor because I have to

lean over the car and the visor contacts the car so on that job I would tend to wear a mask, but it makes me lightheaded and anxious so I'd put it under my chin more often than not.

On the other job I could wear the visor

AE: Sorry, I just want to clarify something, so a minute ago you said you did not want to wear it because it causes you anxiety

MF: It does but I've been having to wear them under duress though, he keeps coming down and

Telling me to wear them and you know I've got an exemption, so I don't see why I have to?

He keeps putting me under duress to wear it so that is where I'm at, you know?

AE: So, your exemption covers all face coverings?

MF: I believe so yes.

AE: Ok where did you get your exemption from Mike?

MF: Pardon?

AE: where did you get your exemption from?

MF: I contacted my doctor and he said all's he would do for me was give me the government website print off which I could have done myself, so I asked around and ordered one off the Hidden disability's website.

AE: So, you have been to our Occupational Health dept. To see Dr Dobbins?

Have you read the report?

MF: yes

AE: It's saying that there are no underlying health issues that stop you from wearing a face covering.

MF: Well, that's his opinion but it causes me anxiety and stress, that's all's I can say to you.

AE: So, the doctor that you have been to see has said in his opinion there is no underlying medical condition that impacts Michael Furlong wearing a face covering.

MF: Yeah well, I think you may need a second opinion there Andy.

AE: ok so that is what I've got in front of me yeah, so other than you would like a second opinion is there anything else?

MF: Well, he is giving you his opinion, and I am giving you mine. Jaguar have taught me to be my own Health and safety officer.

AE: He has formed an opinion based on information you have gave him

MF: I gave him information without a mask on and explained the situation. That is his opinion Andy but I will tell you one thing for nothing, I am not a liar.

AE: I am not saying you are

MF: Andy, Jaguar have taught me to be my own Health and Safety officer now after I had a funny turn because of the restriction of my airflow and nearly fainted I did raise this with Simon Mansfield, and it needs highlighting and it's not just me, there are lads on the line who will suffer with long term issues because of this.

AE: That is your opinion, so were you had that issue was a visor provided?

MF: I actually bought a lightweight visor which was more practical than the Jaguar one it did still dry my nose out, but it was better as I was under duress to wear one regardless of my exemption.

AE: Right, ok so what's wrong with the face visor

MF: It dries my nose out it restricts your air flow, its not ideal like, this occurred during the Spanish flu a lot of people got bacterial pneumonia though wearing them. It's the equivalent of wearing a petri dish on your face.

AE: Ok, so you have been offered a choice of face coverings, haven't you?

MF: yes

AE: So why don't you prefer a different type of face covering?

MF: Pardon?

AE: Why don't you prefer a different face covering?

MF: I was under duress to wear a face covering. I had to wear something they kept telling me, even with an exemption. Nowhere else insists to wear one.

JH: So, can I just clarify, are you saying you can go into a doctor's surgery or a hospital reception area or dentist without a face covering?

MF: According to the government website Janet, yes.

JH: So, have you been to any of those areas?

MF: I haven't been into any of them areas, no.

JH: ok

AE: Where you said we don't have a right to ask you about face coverings

MF: I actually emailed the link to Fred Quinn I think its in the pack Andy

AE: I think I've seen it somewhere

MF: Yes, in an email to Fred Quinn

AE: bear with me.

MF: yes, no prob.

AE: so, the links there, my understanding of that link is you can't be routinely questioned

MF: I was getting questioned all the time, Fred Quinn asked me what my exemption was for. When I told him, he said, "it's not good enough" and then when I told Richard Mann he said I was "Being silly".

AE: Ok, so you told him it was anxiety, you said in your last statement you never had a problem wearing one.

MF: The lightweight one yes, well they were insistent I had to wear something. I was under duress.

It dries all my nose out.

AE: Could you source one?

MF: No, I won't use Amazon. They are trying to kill the economy so I am boycotting Amazon

I've looked in a few shops.

AE: There's lots of stores not just amazon.

MF: but its P.P.E, should it not be company issue?

AE: A glasses type visor I currently have in my hand I purchased myself off Ebay.

MF: Would you class it as PPE?

AE: No

MF: ok, (non-essential?)

AE: Well the company provide P.P.E but you have the option to source your own

In terms of the company responsibility, they have gone above and beyond in their obligation to provide P.P.E

MF: I had mine stolen from lineside and wasn't even given the time to replace it I was sent home.

AE: The company have given you 3 different options of face covering

MF: Even though I have an exemption.

AE: The information we have from the company doctor says in his opinion there is no exemption for you to wear a mask.

MF: There obviously is because I nearly fainted and I have highlighted this, you have taught me that first and foremost I am my own Health and safety advisor.

JH: Can I just ask a question Mike so the Exemption is that something you printed off yourself

MF: No I ordered it Jan, my doctor said all's he would give me was a print off from the government website so I ordered a lanyard.

AE: From whom?

MF: Pardon?

AE: From whom?

MF: Hidden Disabilities .com

JH: ok so did you see anybody, on what basis did you qualify for this

AE: So, you did not go through any medical or psychological assessment?

MF: No but my doctor said all's that he could give me was a printout of the government website, Fred was quite insistent that I needed something, but what the doctor suggested Fred said wasn't good enough, so the only other option was to get a lanyard.

AE: Ok, even if the company issued you with a glasses type mask you still wouldn't wear one?

MF: I can wear one for a bit, but it does dry out your nasal cavity, you are rebreathing Co2 it restricts your airflow.

AE: Mike try your best to answer the question, If the company would have issued the glasses type mask would you have worn it?

MF: I don't think I could wear it for 8 hours

AE: So, you wouldn't wear it for 8 hours?

MF: I don't think I could.

AE: Why are you choosing to just disregard the company's rule to wear a mask?

MF: Pardon?

AE: Why are you choosing to just disregard the company rule to wear a mask?

MF: Because I nearly passed out, I have explained this and tried to resolve this time and again?

AE: Ok

JH: So, can I ask then, Michael what is your resolution to this?

MF: The company need to investigate this.

JH: What is your resolution right now?

MF: Janet, the company need to.. Janet can I speak please, the company and the board have a duty of care for the health and wellbeing of their workforce now over time wearing facemasks for 8 hours a day a lot of our members of staff are going to get sick with the likes of bacterial pneumonia, the company are not safeguarding the health of the members of staff, there is no long-term health risk assessment on these Janet. This is serious stuff.

AE: Mike,

MF: yes

AE: Watch your language.

MF: I didn't use any language I said its serious stuff. Andy

AE: Apologies, stuff sounded like something else.

MF: There is no language here, No language.

AE: The reason the company have people wearing masks is to protect their health and safety and we are taking advice from the W.H.O and public health England.

MF: Just for the record Andy the World health organisation and the C.D.C only recommend masks if you have symptoms, which I do not.

JH: How do you know?

MF: I've done my research.

JH: How do you know you haven't got Covid?

MF: You'd have symptoms, I don't know whether you're aware but 13 days prior to the 1<sup>st</sup> lockdown the government themselves actually stated on their website that it was not a highly infectious disease. That was on the government website.

AE: Mike, you may find stuff on any website that may fit in with your agenda.

MF: Well Andy I have a 38 page document here on a pdf and several freedom of information requests have gone to:

The Privy Council

The House of Lords

The House of Commons, just let me get the list...

AE: its irrelevant

MF: What? I think you will find its very relevant, you have put a mandate in place and there is no actual evidence of a virus being isolated. I think its very relevant Andy, its serious. A lot of your members of staff are going to come ill because of the measures you are taking.

AE: Mike..

MF: Yeah?

AE: So, I'm not going to go to deeply into that as its your opinion,

MF: It's no problem.

AE: The guidance the company has taken was from Public Health England and are supplying facemasks to keep people safe

MF: Andy can I just say whilst you are on the subject of Public Health England, a freedom of information request went to them on the 25<sup>th</sup> July 2020 and they had no information on the isolation of SarsCov2 so if its never been isolated Andy therefore it does not exist, I'm afraid.

AE: So, your telling me there, its your belief that Covid19 doesn't exist?

MF: Well, it's never been Isolated so it can't have. It can't be.

AE: So, in your opinion

MF: Its not an opinion, I have a PDF with evidence on if you would like me to send you a copy?

AE: No, I am asking you on your thoughts on Covid 19?

MF: Its seasonal flu, the government themselves said it was not a highly contagious disease 13 days prior to the 1<sup>st</sup> lockdown on the government website. That's a fact.

AE: So Mike,.

MF: Yeah?

AE: Ok, so I'm going to move on from the face coverings and the refusal of face masks, why have you sent demands to the company and continue to do so?

MF: I'm not getting any answers to relevant questions regarding our workforce's health and safety, you know there are long-term health implications here and I feel it is very relevant for me and my colleagues to find this information out, unfortunately I'm not getting any answers. I'm currently corresponding with the C.E.O on this and I'm not getting anything back.

AE: ok

MF: The company have told me to be pro-active and always challenge anybody if I feel there is a potential health and safety risk, and I genuinely believe that the masks will cause long term health issues, yet when I raise this issue Andy, I am alleged to be malicious and vexatious, I find it rather shocking.

AE: So, the tone of your letters that you sent, and your demands. The tone of them had you considered how other people could be impacted by some of the stuff written in there?

MF: I thought they were rather polite, you know Fred Quinn kept coming to me he would not except my exemption, so I tried to resolve it but I couldn't get any answers, so I then went to Ian Holohan, Grant McPherson and Trevor Leeks and got no response, so I escalated it to Thierry Bollore, and I still have had no reply. There is a lot of evidence coming out.

AE: Mike, you didn't answer my question.

MF: What was your question sorry?

I did answer. I said I didn't feel it was aggressive or vexatious.

AE: Do you understand how it could be.

MF: It's a conditional note of Acceptance, I think its fair game, if you want me to wear a mask you need to justify it. I have more evidence to prove its detrimental than I'm getting back.

AE: So, I will ask again, do you understand how it could be perceived by somebody else?

As not great language to read?

MF: I was merely asking for answers. There were no curse words.

AE: So, you stated in there that the company provide evidence of covid 19

MF: Yes, because it's never been isolated. That is factual.

AE: I am not saying that, but that is what you have stated in the letter.

MF: Yes, because I have freedom of information requests that have gone to:

The Privy Council

The House of Lords

The House of Commons

The Prime Minister

The Cabinet Office

The Dept of Health and Social Care

Public Health England

And they do not hold that information, so it doesn't exist.

AE: Can you understand how that could cause distress to somebody?

MF: Well, I am sorry for that, but If people do there research it is what it is, I'm afraid.

AE: So, you have sent these letters to people you do not know personally.

MF: No, but I needed answers to these questions that have answers to things directly affecting both mine and my colleague's health, do you understand that Andy? It will have implications on people's health, and the company and the board members have a duty of care for Our health.

AE: Mike...

MF: Yeah?

JW: So, what I got from you their mike was the company has responsibility for health of employees.

MF: They have a duty of care Janet yes, and during the Spanish flu several people got bacterial pneumonia from wearing a mask on their face, it's the equivalent to wearing a petri dish on your face, bacteria breeds at forty (40) degrees Janet.

JH: Spanish flu was 150 years ago though wasn't it?

MF: Its still a mask on the face. It's the same conditions, it's the equivalent of a petri dish on your face. Bacteria breeds at forty (40) Degrees.

AE: Mike....

MF: Yeah?

AE: I'm just going to go back this question, I've asked you twice and you have repeated the same answer, which is not answering the question,

Listen carefully, you asked for the company to provide you evidence that covid causes death. Can you see how somebody else may have had a family member that died of covid?

MF: Yes, I have a close friend whose father died, and the death went down as covid 19 and it is alarming and stressful as covid 19 has never been isolated so the whole thing is a hoax, and the freedom of information requests will prove that. I don't know whether you are aware, but the government are facing charges of treason and Genocide, (see Annexure 7a, Certified copy of P.U.B vs Hancock and Co) the whole thing is to destroy the economy, and its all starting to come out. But, In the meantime, we need to look after our own staff and stop restricting their airflow on the back of this scam.

AE: All of us are wearing masks to ensure our factory is safe

MF: I think they need to look a bit further into it, Andy

AE: Mike...

MF: Yeah?

JW: So, you are saying they need to look further into it?

MF: Yeah, yeah, they need to get down to the nitty gritty Janet, and I have a lot of information I can forward you these F.O.I.Rs, the virus has never been isolated, there is a lot of skull duggery going on a lot of information. If you would like me to forward it to you? The government have been indicted on Genocide and Treason, a lot of this is coming to light, there is. The way the company is acting, they don't want to be seen as complicit in it, a lot of staff will get sick from the measures taken for basically a seasonal Flu virus.

AE: Mike...

MF: Yeah?

AE: If you was in work...

MF: Pardon?

AE: If you was coming to work, and you had one of the recognized symptoms, Would you come to work?

MF: Probably not

AE: Why not?

Mf: What?

AE: Why not?

MF: I'd have to ring my supervisor and tell him, because people are scared over it, its scaremongering. What's it's called Andy is Trauma based mind control, its Propaganda on the tele 24/7, its never been isolated and it will be proven.

AE: It has not been isolated so if you were showing symptoms what would you do?

MF: I would ring my supervisor and advise me what to do

AE: What would you do?

MF: I'd follow process and ring my supervisor.

AE: Ok, thank you.

MF: I'd follow process and ring my supervisor.

AE: Thanks Mike

JW: Would you go for a test Mike?

MF: I would not go for a test, a guy called Kary Mullis designed the P.C.R (polymer chain reaction) and stated it is not to be used as a diagnostic tool, It gives 97% false positive.

AE: Mike...

MF: Yeah?

AE: You follow you foreman's advice...

MF: Pardon Andy?

AE: You'd follow you foreman's advice which is to isolate and book a test? So, would you book a test?

MF: I would not go for the PCR test no; it damages the brain blood barrier. The man who invented it Carey Mullis, said its not to be used as a diagnostic tool, gives 97% false positives, this Pandemic, this alleged Pandemic has gone from Deaths to cases all of a sudden, It's a Fraud.

AE: Mike...

MF: Yeah?

AE: Mike, 1 last question for me at this stage. On the email you sent on the Fred Quinn on the 21<sup>st</sup> of October. Sorry on the 20<sup>th</sup> of august at 09:49 and Fred Quinn, David Evans and Paul Cooper was Ccd in it

MF: I am, just looking for it

AE: Discussing politics, Boris Johnson, it discusses Brexit, it discusses Genocide and Treason.

MF: Yeah

AE: Mandatory masks and visors is the subject, towards the end of that After you talk about 5G masts, poisoning at 6-Ghz makes the blood coagulate,

MF: Yes, and I sent a freedom of information request to Joe Anderson regarding insurance, and it was all redacted.

AE: Mike..

MF: Yeah?

AE: Mike, listen to what I'm asking please, so the blood coagulated, The next statement says WE look forward to your response collectively or individually, however the email was only from you.

MF: A lot of my colleagues on the door line wanted answers to the same questions but they were afraid, so I said I would ask.

AE: Ok, it doesn't say anywhere else its on behalf of anyone else.

MF: People are scared so I said I would be the mouthpiece.

AE: Moving on to the last letter you sent to Thierry Bollore A Notice of dishonour and opportunity to cure point 7 Evidence that the government Lurgy has ever been proven to exist, are you referring to Covid

MF: SarsCov2, never isolated, 28 page F.O.I.R which proves its never been isolated from..,

AE: Covid 19?

MF: Pardon?

AE: Covid 19

MF: Covid 19 actually stands for ; Certificate Of Vaccine Identification, that's SarsCov2

AE: Mike, to what are you referring when you say government lurgy?

MF: That is correct.

AE: Thank you, Right now I'm going to take an adjournment Mike

MF: No problem, how long will you be Andy?

AE: I have no idea mate.

MF: Ok

AE: I will be as quick as I can.

Mike, I'm not convening to make a decision, sorry I will come back to that..

MF: I would not expect you to make a hasty decision on this one Andy, take as long as you need.

Adjourned.

Reconvene:

JH: Andy and Steve are here

AE: I just wanted to make sure I'd been through everything before we adjourn to decide if there is anything you would like to add?

MF: No, not for now, I think I've covered enough for now.

JH: We're going to take an adjournment

MF: How long will it be?

AE: It could take 3 weeks it could take ten minutes.

MF: ok

Adjourned.

Reconvened:

AE: We have concluded that the allegations against you are proven

In relation to the first allegation which is a serious disregard of company safety procedures by persistently failing to wear a face covering, breaching company safety procedure whilst on company premises, it's widely publicised that we have gone over and above with our safety procedures

By not complying you are putting yourself and others at risk

This is compounded by the fact Liverpool is in a high-risk tier 3 area so that is my explanation we are satisfied with the first allegation.

In relation to the second allegation which is refusal to comply with a reasonable and authorised instruction to wear a face covering in line with government policy the refusal to follow a reasonable instruction is satisfied by the fact what was stated in the first allegation is that it was a reasonable request in that the company requested that you wear it and you are saying that you won't wear it.

You persistently, deliberately, and wilfully disregarded the instructions from your leadership team, you clarified this yourself by stating you remove it. What that shows is that you know that this is wrong. This is a fundamental breakdown of trust underlining the employment contract.

I've considered your exemption you say was printed off a website and our medical officer has confirmed you had no underlying medical condition for you not to wear a mask.

The third allegation is circulation of offensive material this could cause someone distress based on your questioning of the existence of covid if somebody had received that letter who had a family member affected by covid, even right now people could have family in hospital affected by covid and you sending that letter could have caused distress and offence, in addition to that even after being invited to a disciplinary hearing on the grounds of circulating offensive material you continued to send inappropriate material since.

So to summarise, I am satisfied each allegation has been proven, each allegation are acts of gross misconduct given that they caused a fundamental breakdown of confidence underlining your employment contract each of which could result in dismissal, but before I make that call, I had to

consider if he wants to do things differently, I considered other options but I don't believe there will be a resolution to this. But you will not wear a facemask. In addition, you also stated that you would not go for a test. So potentially whatever decision I made, you would not be tested and potentially infect other people. In all consideration each individual allegation is gross misconduct in itself, and I can't satisfy myself that any other punishment other than dismissal would give us a resolution to this issue and with that I will be dismissing you today.

MF: I will appeal right now, what is your email address Andy?

JH: Just let him finish mike

AE: I don't see any other option to dismiss you your last day is today. You can appeal upon receipt of the letter. You get 5 days

JH: you will get a full outcome in writing then you get 5 days from when you receive the letter

MF: Steve, can I appeal now?

SMcG: you may miss something

MF: I would like to appeal now, on the grounds that your mask mandate is based on fraud

AE: the meeting is closed.

END

PUB v Hancock & Others | Service & Receipt of Evidence Bundle

PUB v Hancock & Others | Service & Receipt of Evidence Bundle

For the purposes of neutralising the effects of plainly ludicrous and downright malicious claims by a few well-placed agent provocateurs on social media, the slideshow above documents the boxing up, service and delivery of the evidence bundle for PUB v Hancock & Others last week, including hard copies of the papers served by email on 19/03/2021.

As you can see for yourself on the Royal Mail Track and Trace page, from which the final picture has been taken, after entering the reference number on the mail receipt, the case files were received by Westminster Magistrates Court on Friday morning.

All being well, we will receive some kind of indication as to when we are likely to receive the initial response of the court's legal department early this week. Needless to say, as soon as there is any news it will be posted on this blog and across all my social media platforms.

Critical Thinkers Unite

However, despite the fact that publishing those images should easily rescind the nagging doubts in the minds of those for whom seeing is believing, it is simply not realistic to expect the Common Purpose graduates who have been defaming my character and work to cease and desist just yet.

Especially when the only ammunition they have to fire at me comprises of nothing more than offensive ad hominem, empty-headed fallacies and malicious falsehoods, almost all of which are discharged behind my back, in the hope of convincing people that neither I nor the PUB are to be trusted.

In spite of the fact that, in the event the PCP succeeds, nobody involved stands to gain anything from the tens of thousands of hours we have spent mastering this most urgent of subject matters, other than the restoration of Common Law, justice and freedom, for the sake of our children and future generations.

That being understood, just for the seethingly ironic comedic value, here is a selection of the most common defamatory social media heckles, delivered by Common Purpose shills, alt-media gatekeepers and an assortment of government agents, over the course of the last thirteen years:

"He's working for MI5 and he's positioning himself as leader of the controlled opposition."

As opposed to having been surveilled by MI5 since September 15 2001, after being placed on the 'potential subversives' list, when I interviewed the 1st 9/11 whistle-blower on a bugged telephone line.

"He's a high ranking Freemason, secretly working for the House of Rothschild."

As opposed to a stubborn working class autodidact, who refused to sell his soul for the guarantee of riches, fame and success in the film industry and went on to prove mortgage fraud in the high court against a Rothschild controlled bank, preventing his parents and sister, his bother-in-law and two nephews from losing their homes.

"He's committed treason by telling people that Article 61 of Magna Carta 1215 has never been law."

As opposed to having proven with historical evidence that Magna Carta 1215 was formally replaced by Magna Carta Libertatum in 1216 [without Article 61] and that none of the Great Charter's articles became English Law until 1225.

"He's just Truther Industrial Complex, spinning another line for his handlers."

As opposed to the most aggressively censored, notoriously self-governed, consistently cage-rattling, unapologetically recalcitrant blogger on these tyrannised shores.

"The PCP is a fantasy – completely made up – just like everything else he claims to have achieved."

As opposed to the most important criminal case in British legal history, founded entirely upon demonstrable truth and enshrined in binding Common Law precedents, just like every other case in a 100% track record.

Nevertheless, the long running, truly pathetic and childishly spiteful hate campaign against me has been met with an indomitable shield-wall of spontaneous intellectual resistance, since I have an ever-growing, revolving phalanx of fearless critical thinkers covering my back, whenever and wherever necessary, for which I am eternally grateful.

United we stand, armed with the logical synthesis of the sustainable facts, in accordance with the letter and spirit of the Common Law, which is best understood as Natural Justice In Action, the central tenet of which is the Golden Rule – Do No Harm.

Moreover, we now have in our possession the crucial data required to win the decisive battle in the COVID-1984 information war, against the most expensive propaganda and psychological warfare campaigns that any British government has ever waged against its own people.

#### PCP Week One Snapshot

Over the course of the first week, following the electronic laying of the information in the Private Criminal Prosecution against Hancock, Whitty, Vallance and Ferguson, we witnessed the following events:

The Gates Foundation removing links to evidence we cited in the papers from their website, the day after they were electronically laid at the court.

YouTube and Twitter censoring Mark Devlin's channels, three days after he released an interview with yours truly about the electronic laying of the papers, when it had already attained in excess of 40,000 views.

Matt Hancock stuttering and stumbling, after being asked, in the Parliamentary Coronavirus Act 'debate' last Thursday, about existing data on fatal adverse events within three weeks of the COVID jabs.

The evidence bundle being served upon and received by Westminster Magistrates Court, as shown in the foregoing image gallery, the day after Hancock's bumbling response to by far the most significant question asked by any MP since the first day of this treacherous Parliament.

#### Panic on the Streets of Whitehall

Since late 2020, I have been publishing information about the leaked WHO safety study, which recorded a 0.377% minimum mortality rate, within three weeks and a day of receiving UK MHRA licensed flu 'vaccines'.

Therefore, it is somewhat unlikely that the question posed to a panic-stricken Hancock in Parliament last week can be set aside as merely coincidental to the Statement of Case being laid electronically at Westminster Magistrates Court six days earlier, arguing that the very same question demands an immediate answer from each of the four defendants [obviously including Hancock].

Especially when the minimum mortality rate for flu jabs is shown, by data correlations we have now adduced into evidence, to be almost identical to that of healthy adults injected with the COVID 'vaccines', within 22 days of getting the jabs.

Suffice to say, PCP Week One has been eventful, to say the least. So it seems more than fitting to end this post with the words which fellow outspoken recalcitrant, Mark Devlin, said to me last week, when he informed me about the interview being censored on his channels:

"Do you think we hit a nerve?"

From : [www.thefreedomcycle.com](http://www.thefreedomcycle.com)

IN THE MANCHESTER EMPLOYMENT  
TRIBUNAL

Case no: 2402150/2021

BETWEEN:

MR M FURLONG

Claimant

and

JAGUAR LAND ROVER  
LIMITED

Respondent

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RESPONDENT'S GROUNDS  
OF RESISTANCE

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1. The Respondent is a premium automotive manufacturer, with manufacturing sites in the West Midlands and in Halewood, Liverpool.
2. The Claimant commenced employment with the Respondent on 21 April 2012 until he was dismissed for gross misconduct on 12 November 2020. The Claimant was employed as a Production Operative and had been at all material times. This role was based at the Respondent's Halewood site based in Liverpool.

**Background**

3. The Respondent has kept its employees fully updated in respect of the evolving pandemic. This has included frequent updates to ensure compliance with government legislation and guidelines to enable it to continue to operate safely. Throughout August 2020 the Claimant had sent emails to his managers challenging the facts of Covid-19 including its existence and the working condition imposed as a consequence of it. A referral was made to Occupational Health ("OH") following an email sent by the Claimant to OH and the Trade Union that he was suffering from stress. On 17 September 2020 the Respondent circulated updated communications to its employees regarding the concerning increase in cases of Covid-19 and the necessary workplace guidelines that needed to be adhered to including the wearing of face coverings. The Respondent sought to actively encourage consistent and safe behaviours by all for the protection of individuals and their colleagues.
4. On 15 October 2020 the Claimant sent emails to senior managers including the Respondent's CEO which included requests for answers to questions and a document headed "Notice – Conditional acceptance for wearing a face mask". The document made multiple requests for evidence of the existence of the virus, severity, accuracy

of statistics, accuracy of testing kits, understanding of Nuremberg code and implications, effect of wearing a mask on oxygen consumption, carbon dioxide poisoning and having lung infections. The Claimant sought for the Respondent to sign the document to confirm responsibility for inaccurate or false information whether known or unknown at the time, liability for damage or ill health suffered by wearing a mask in the short or long term and to pay a significant penalty fee as determined by him. The Claimant demanded for the document to be agreed and signed or, in the alternative, returned unsigned having accepted his terms.

5. On 19 October 2020, following repeated requests to wear a face covering, the Claimant said that he could not comply with the Respondent's mandatory requirement to wear a face covering as he had an underlying health condition. Consequently, he refused to wear a face covering, neither a mask nor visor, saying that he did not like wearing the face masks and was required to leave site pending a referral to Occupational Health and further investigations. A case management incident report was submitted by Fred Quinn, Production Manager, confirming details of the incident. The Claimant declined to confirm the underlying medical condition he had which rendered him unable to comply and so a referral was made to the Respondent's OH department. A letter was sent to the Claimant via email confirming this and that he was not to attend site, this was to protect all individuals who remained on site particularly as there had been an increase in Covid-19 rates generally, but specifically in the Northwest area. The letter also acknowledged receipt of the "Notice – Conditional acceptance for wearing a face mask" and confirmed contact would be made shortly to make arrangements for a meeting. The Claimant was suspended on full pay pending investigation.
6. The Respondent conducted an investigation into the incident report raised by Mr Quinn that the Claimant had failed to comply with the requirement to wear a face covering and inappropriate communication having been sent to senior management. The investigation was carried out by Jason Wilding, Production Manager. The Claimant was invited to attend an investigation meeting on 22 October 2020 however he could not attend, the meeting was rearranged to take place on 29 October 2020, via conference call. Mr Wilding also conducted interviews with Mr Quinn and Phil Henderson, Trade Union representative, during his investigation. Mr Wilding confirmed the following outcomes of his investigation:-
  - a. The Claimant's work area was checked and it was confirmed that face covering was needed as there were occasions where the 2 metre rule could not be adhered to complete the task at hand. It was established that a visor was fine and appropriate as an alternative to a face mask.
  - b. The Claimant had refused to wear a face covering on a number of occasions
  - c. The Claimant asserted that the wearing of a mask caused him anxiety owing to the tightness of the head strap which could have been adjusted without altering the effectiveness of the visor.

- d. Mr Quinn indicated that the Claimant was issued with several single use visors and face masks during August to October 2020; however, the Claimant returned these. In addition, the Claimant was issued with six re-usable face masks which were returned by the Claimant as he was not prepared to wash them. The Claimant said he had been attempting to source a visor for him to use but had been unable to do so in a 2-week period but could not elaborate on his efforts including where he had tried to source these.
  - e. The Claimant said that he had worn a mask when a manager has been in the vicinity and removed it when they had left
  - f. The Claimant asserted that he had used a glasses visor which he bought himself, which was stolen, and he was unable to replace.
  - g. The Respondent's OH department had an appointment with the Claimant on 22 October 2020 and were unable to identify any medical reason as to why the Claimant was unable to wear a face covering and neither did the Claimant provide any information of any underlying or ongoing medical issue which would corroborate his assertion that he could not wear a face covering.
  - h. The Claimant said the purpose of his communications to senior management was to ask for a risk assessment regarding the wearing of masks; however, this was not the content and tone identified; it questioned the existence of Covid-19 and demanded conditions be met before he agreed to wear a mask including the payment of a penalty to be decided by him.
  - i. The Claimant stated that he did not consider the impact of him not wearing a face covering, stating the virus didn't exist and that the wearing of masks did not offer any protection saying, "it doesn't concern me".
7. After completing his enquiries and considering his decision it was decided that there was a case to answer and that the matter should proceed to the next step, namely the disciplinary hearing.
  8. The Claimant was invited, via letter sent by email sent on 9 November 2020, to attend a disciplinary hearing on 12 November 2020. The Claimant was informed that the hearing was to discuss allegations of potential gross misconduct as follows:-
    - a. Serious disregard of Company Safety precautions by persistently failing to wear a face covering whilst on Company premises;
    - b. Refusal to comply with a reasonable and authorised instruction to wear a face covering in line with Company policy; and
    - c. Circulating inappropriate communications to JLR Management in breach of the Company's Dignity at Work Policy which could be considered to be offensive, threatening and/or vexatious.
  9. As the nature of the investigation and disciplinary was failure to wear a face covering, the Claimant was informed that he was required to wear a face covering at all times when moving around the site, including to and from the meeting room where the disciplinary meeting was scheduled to be held. He was advised that he could remove

the face covering once seated in the meeting room at the appropriate social distance; however, he declined to comply. Consequently, the disciplinary hearing was conducted by conference call to accommodate his attendance.

10. The disciplinary hearing took place as planned on 12 November 2020. Andy Evans, Production Manager, chaired the hearing. Janet Harkin, Senior HR case management adviser supported the meeting and took notes. The Claimant attended via conference call and was accompanied by Steve McGravie, TU representative who was present in the meeting room with Mr Evans and Ms Harkin. During the meeting the Claimant stated that he had an exemption to not wear a mask and his manager did not have the right to ask him about the exemption. Mr Evans sought clarification from the Claimant, he confirmed that he could not wear a face covering, neither a mask nor a visor, and that this was owing to his stress and anxiety and further explained his view that it would result in him breathing in CO2. Mr Evans referred to the OH report provided and there was no reference to any underlying health condition which would negate him from wearing a face covering. The Claimant said that the wearing of a face covering promoted medical issues such as bacterial pneumonia. Mr Evans explained that there were a range of options available for face covering provided by the Company, but they were also open to employees using their own if they desired. Mr Evans further explored if an alternative lightweight visor was sought if this would be agreeable to wear and the Claimant declined stating he "could wear it for a bit... not the whole shift", Mr Evans asked what resolution the Claimant could offer, he reiterated his concern about all employees getting bacterial pneumonia and that the Respondent had not done a risk assessment on this. Mr Evans attempted to provide reassurance by referring to being led by the WHO, government and public health guidelines. The Claimant was not satisfied by this and expressed his view that his own research did not support the measures and there was no evidence the virus existed and referred to it being seasonal flu.
11. Mr Evans then discussed the correspondence the Claimant had sent to senior managers. The Claimant stated that he did not believe the correspondence to be inappropriate, he continued by questioning the existence of Covid-19 with comments made of a government lurgy, government treason and genocide and that the Respondent would be complicit in individuals getting sick, bacterial pneumonia, over the flu virus. The Claimant was asked to confirm his actions if he had symptoms and he indicated he would report to his manager and follow process but would not get a test as it is not a diagnostic tool.
12. Mr Evans adjourned for a brief period to check if he had any additional questions and then took a further adjournment to review the evidence and discussions held during the meeting. Mr Evans confirmed that he was satisfied that each allegation had been proven and provided a verbal explanation on each point. He was satisfied that the Respondent had put in place all measures during the pandemic as per the national advice and supported by the Respondent's Chief Medical Officer and that the

measures implemented to protect the health and safety of all would only work if everyone complied. Mr Evans explained that the Respondent had provided many options of face covering to the Claimant including reiterating he could use one of his own choosing if he so wished, the Claimant failed to comply and disregarded a reasonable instruction persistently. Upon trying to explore the medical exemption relied on by the Claimant there was no medical reason for the Claimant not wearing a mask and during the discussions the Claimant acknowledged that he had worn a mask briefly only when a manager was around indicating he knew he needed to wear it and his actions were against rules. It was held that his actions put himself and his colleagues at risk particularly as Halewood was in a high-risk area. It was held that the communications sent to senior managers was inappropriate with no consideration of the effect of his words on the people viewing it, his response when discussing the communication was described as "nonchalant".

13. Mr Evans considered the sanction to be imposed and decided that there was no alternative but to summarily dismiss the Claimant, he was further informed of his right to appeal the decision. The decision was further confirmed to the Claimant in a letter dated 17 November 2020, sent via email.

14. The Claimant exercised his right to appeal, via email dated 23 November 2020, stating the following grounds:-

- a. A breach of GDPR regulations, a violation of Equality Act 2010 and a breach of the Nuremberg code
- b. He alleges he informed management of his condition and consequential exemption for wearing a face covering, but this was not good enough and say he was constantly harassed to wear a face covering when suffering from anxiety, stress and being under duress
- c. His requests in the communication "Notice – Conditional acceptance for wearing a face mask" was not read properly and was not threatening but an escalation to answer reasonable questions.

15. The Claimant had by this time sent communications to the Respondent's CEO resulting in a letter being sent to the Claimant dated 26 November 2020 from the Head of HR directing him to raise the points to his appeal and to confirm that the CEO would not be responding.

16. The Claimant was invited, via letter dated 26 November sent by email, to attend an appeal hearing on 30 November 2020 via conference call. Nicolas Teasdale, Manufacturing Manager chaired the appeal, he had not met the Claimant before and regarded himself as independent to hear the appeal. Ms Harkin supported the meeting and took notes. The Claimant attended via conference call with his TU representative Mr McGravie. The Claimant discussed his grounds of appeal and provided clarification on the points raised. In response to questions from Mr Teasdale of his alleged exemption, the Claimant said he did not have a disability, but had anxiety wearing a

mask, he did not have an exemption from his GP but explained that a doctor had directed him to the NHS website for a form which he printed from the hidden disability's website. In relation to the Nuremburg code, he said that the requirement to wear a mask was a social experiment under the Nuremburg code and therefore consent was needed for him to wear one. The Claimant added that he was acting on encouragement by the Respondent to be his own Health and Safety officer. The Claimant said he was being badgered all of the time by his Production Leader to wear a face covering although he knew that his Production Leader was doing as he was instructed and was checking that all others had a face covering on as well. The Claimant reiterated that he had sent correspondence to senior managers as he was asking valid questions in his role as being his own health and safety officer and further said the requirements did not make sense as people are being deprived of oxygen and then are sick. Mr Teasdale explored with the Claimant whether he would be willing to wear a visor, he acknowledged he was provided one by the Respondent and alleged that one he had bought for himself had been stolen. The Claimant stated that the visor issued by the Respondent was not suitable as the head band caused him discomfort and even with a visor he was breathing in CO2 and his nasal cavities were drying out.

17. Mr Teasdale took an adjournment to collect his thoughts and consider if there were any further questions. When the meeting reconvened Mr Teasdale sought clarification regarding the exemption to which the Claimant replied that he had applied and purchased a lanyard and certificate from a disability website but he was told it was not enough and his manager wanted to see something from his GP. Mr Teasdale asked if anything was issued by a medical person and the Claimant said he did not know. Mr Teasdale then asked the Claimant about his appointment with OH to which he responded that he disputed the outcome and that a second opinion was needed. The Claimant stated that he believed that Mr Evans had not looked at the case properly and drew to Mr Teasdale's attention that a freedom of information request had been submitted to Public Health England, Privy Council, House of lords and the House of Commons on 25 July 2020. Mr Teasdale decided to take an extended adjournment to consider his decision carefully.
18. The appeal hearing reconvened on 14 December 2020 with the same individuals in attendance. Mr Teasdale began to give his outcome, but very shortly into the meeting it was apparent that the Claimant had an undisclosed person with him whilst on the conference call who were involving themselves in the meeting, this was as well as the Claimant being accompanied by his TU representative Mr McGravie who was present in the meeting room with Mr Teasdale. The appeal hearing was stopped, and it was confirmed that the outcome would be confirmed in writing to the Claimant.
19. The outcome of the appeal hearing was confirmed to the Claimant in writing via letter dated 16 December 2020 and sent by email. Mr Teasdale upheld the decision by Mr Evans to summarily dismiss him. Mr Teasdale was satisfied that there had been no breach of GDPR as alleged by the Claimant and that his manager had acted

appropriately to fulfil his duties and responsibilities to ensure a safe working environment and it was reasonable to seek clarification when not wearing a face covering. It was also confirmed that his Production Leader had not harassed the Claimant by persistently asking him to wear a face covering and his approach was consistent to challenge all employees on this issue. Mr Teasdale did not believe there had been a breach of the Equality Act 2010 and cited the outcome of the OH report that there was no underlying medical condition and the response instead was an emotional one from the circumstances he was finding it difficult. Mr Teasdale acknowledged the Claimant's personal views on the wearing of face coverings but reiterated that measures were put in place to adhere to advice and were for the safety of everyone. Mr Teasdale was satisfied that the communications were inappropriate, demanding and without consideration of the impact and offense caused to others receiving it.

20. The Claimant confirmed via email dated 20 December 2020 that he sought to exercise his right to a further stage of appeal. The Claimant was invited, via letter dated 12 January 2021 set by email, to attend a Stage 2 appeal hearing. Due to HR resourcing issues this meeting had to be rearranged. A further letter was sent on 26 January 2021 confirmed a rearranged stage 2 appeal hearing on 1 February 2021. Clive Roberts, Technology Manager chaired Stage 2 appeal hearing. Sharon Hollier, HR case management adviser, supported the meeting and took notes. The Claimant attended via conference call and was accompanied by his TU representative Mr McGravie. The Claimant's points of appeal were confirmed as similar to those he had presented at his earlier stage of appeal and were discussed at the meeting. The Claimant provided documents for consideration as follows:-

- a) Notice of conditional acceptance
- b) Notice of Dishonour and Opportunity to Cure
- c) Notice of Dishonour
- d) Notice of interest
- e) High Consequence infectious diseases (Gov.uk)
- f) Affidavit
- g) The Light, A Truth Paper November 2020
- h) Notice of conditional acceptance COVID-19 19

21. The Claimant stated that of those documents he was still awaiting a response to the Notice of conditional acceptance and the Affidavit. Mr Roberts upheld the original decision to summarily dismiss the Claimant and provided his decision in a letter dated 3 February 2021. Mr Roberts informed the Claimant that he could escalate the case to a final stage of appeal at an Extended Plant Conference by application in writing. The Claimant submitted a request to progress the matter to EPC however after review by the company, plant convenor and Unite regional officer a decision was made to not progress to the EPC as they were satisfied that the grounds of appeal had been appropriately considered in previous appeal hearings.

## Unfair Dismissal

22. The Respondent denies that the Claimant's dismissal was unfair, as alleged or at all. The Respondent submits that it had a potentially fair reason for the Claimant's dismissal, namely conduct.
23. An employer must act within the band of reasonable responses in treating the misconduct as a sufficient reason to dismiss. In all the circumstances, the Respondent will aver that the Claimant's conduct was such that dismissal was a reasonable sanction which any reasonable employer would have imposed. The Respondent denies that the Claimant has been unfairly dismissed, as alleged or at all. The Respondent had a reasonable belief that the Claimant had committed acts of gross misconduct. It conducted a reasonable investigation and acted reasonably in all the circumstances in treating the misconduct as sufficient reason for dismissing the Claimant. The Respondent took into account the Claimant's grounds of appeal. It is, therefore, denied that the Claimant was unfairly dismissed as alleged.
24. The disciplinary and appeal officers did not believe that a lesser sanction would have been appropriate given the gravity of the Claimant's behaviour. The Claimant is alleged to have refused to cooperate with the Respondent's rules for wearing a face covering; this being one of several important measures put in place owing to the Covid-19 pandemic as directed nationally by the UK government, public health England and the WHO. The Respondent acted appropriately in accordance with advice and instructions and after consultation with the Respondent's Chief Medical Officer and the TU as to communication and implementation. It acted properly in light of the unprecedented climate and attempted to provide the Claimant with various face coverings which he declined. The wearing of face covering was a vital measure in the national efforts to protect the Claimant and his colleagues.
25. The Respondent held that that the Claimant had sent inappropriate vexatious correspondence and documents to senior managers. The Claimant has continued send correspondence, most recently an affidavit sent via email to 9 individuals in the Respondent's employ seeking for them to forward an affidavit to multiple employees giving 3 days to rebut the contents of the Affidavit.
26. If, which is denied, A Tribunal finds that the dismissal was procedurally unfair, the Respondent will rely on *Polkey v AE Dayton Services Ltd [1987] ICR 142* to argue that the Claimant would have been dismissed in any event and to seek a reduction in any award for compensation accordingly.
27. Further and in the alternative if, which is denied, a Tribunal finds that the dismissal was unfair, any compensation awarded should be reduced to reflect the Claimant's contributory conduct.

**General**

28. Unless otherwise acknowledged in these Grounds of Resistance, all claims, whether set out in the claim form or at all, are denied in full. Insofar as any matter in the claim form is not specifically denied or not admitted, it is denied generally.

29. The Respondent denies that the Claimant is entitled to compensation or damages, in any respect.

END  
Jaguar Land Rover  
31 March 2021



DATA SUBJECT ACCESS

Reply all Delete Junk Block

Re: NOTICE OF FREEDOM OF INFORMATION ACT 2000 REQUEST

website - https://liverpool.gov.uk/council/data-protection-and-freedom-of-information/freedom-of-information/about-foi/

Kind regards,

Councillor Daniel Barrington

Labour Councillor for West Derby

Working with Councillors Lana Orr and Pam Thomas

Tel: 233 04201 Email daniel.barrington@liverpool.gov.uk

FREE

ANNEXURE 8

From: Michael Furlong <mf182684@outlook.com>

Sent: 01 April 2020 16:06

To: cllrbarrington@hotmail.co.uk <cllrbarrrington@hotmail.co.uk>

Cc: john.prince@liverpool.gov.uk <john.prince@liverpool.gov.uk>; mayor@liverpool.gov.uk <mayor@liverpool.gov.uk>

Subject: NOTICE OF FREEDOM OF INFORMATION ACT 2000 REQUEST

Dear Sirs,

Under the freedom of information Act 2000, you are requested to please provide the following:

1. Copies of all commercial Liverpool City Council public liability insurance policy certificates with what is covered, policy numbers, providers and underwriters held by Liverpool City Council. In particular, make sure anything regarding 'pollution liability', 'policy enhancement' and 'schedules of exclusions' documents in relation to the commercial public liability insurance policy held by Liverpool City Council.
2. Copies of the 'certificate of indemnity' from Liverpool City Council that may include the public insurance provider and underwriters, confirming that any injuries, damages or adverse health effects directly or indirectly arising out of, resulting from or contributed to by electromagnetic fields, electromagnetic radiation, electromagnetism, radio waves or noise, wireless RF radiation, microwave radiation, non-ionising radiation emitting devices and equipment.

I require written receipt of this Freedom of Information Request. Sincerely and without ill will, vexation or frivolity.

Yours Sincerely

M Furlong.

Sent from Mail for Windows 10

30 DAYS. [Signature]

⏪ Reply all ▾ 🗑 Delete 🚫 Junk 🚫 Block ...

## Re: NOTICE OF FREEDOM OF INFORMATION ACT 2000 REQUEST



Daniel Barrington <cllrbarington@hotmail.co.uk>

>

Mon 13/04/2020 11:03

To: You

Cc: mayor@liverpool.gov.uk; john.prince@liverpool.gov.uk

Hi Michael,

The contact email is informationrequests@liverpool.gov.uk

Kind regards,

### Councillor Daniel Barrington

Labour Councillor for West Derby

Working with Councillors Lana Orr and Pam Thomas

Tel: 233 0420 | Email daniel.barrington@liverpool.gov.uk

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**From:** Michael Furlong <mf182684@outlook.com>

**Sent:** 11 April 2020 17:03

**To:** Daniel Barrington <cllrbarington@hotmail.co.uk>

**Cc:** mayor@liverpool.gov.uk <mayor@liverpool.gov.uk>; john.prince@liverpool.gov.uk <john.prince@liverpool.gov.uk>

**Subject:** RE: NOTICE OF FREEDOM OF INFORMATION ACT 2000 REQUEST

Hello Daniel,

There is no contact details on the link that you sent me, the site is petty vague.

Could you give me the relevant contact I need to speak to?

This is very frustrating as it is a legitimate request.

I look forward to your response.

Yours Sincerely

Michael Furlong

Sent from [Mail](#) for Windows 10

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**From:** Daniel Barrington <cllrbarington@hotmail.co.uk>

**Sent:** Wednesday, April 1, 2020 5:19:09 PM

**To:** Michael Furlong <mf182684@outlook.com>

**Cc:** john.prince@liverpool.gov.uk <john.prince@liverpool.gov.uk>;  
informationrequests@liverpool.gov.uk <informationrequests@liverpool.gov.uk>

**Subject:** Re: NOTICE OF FREEDOM OF INFORMATION ACT 2000 REQUEST

Dear Micheal,

EXHIBIT 3

ANNEXURE 8

Enquiries to: Information Team  
Our Ref: FOI 3743725



Liverpool  
City Council

3

[mf182684@outlook.com](mailto:mf182684@outlook.com)

Dear Mr Furlong

### Freedom of Information Request 3743725

Thank you for your recent request. Your request was actioned under the Freedom of Information Act 2000 in which you requested the following information –

- 1) Copies of all commercial Liverpool City Council public liability insurance policy certificates with what is covered, policy numbers, providers and underwriters held by Liverpool City Council. In particular, make sure anything regarding 'pollution liability', 'policy enhancement' and 'schedules of exclusions' documents in relation to the commercial public liability insurance policy held by Liverpool City Council.*
- 2) Copies of the 'certificate of indemnity' from Liverpool City Council that may include the public insurance provider and underwriters, confirming that any injuries, damages or adverse health effects directly or indirectly arising out of, resulting from or contributed to by electromagnetic radiation, electromagnetism, radio waves or noise, wireless RF radiation, microwave radiation, non-ionising radiation emitting devices and equipment. I require written receipt of this Freedom of Information Request. Sincerely and without ill will, vexation or frivolity.*

### Response:

Liverpool City Council would advise as follows –

1. Please refer to the attached policy.
2. N/A

With regard to those elements of your request seeking disclosure of current costs, policy numbers or contractual data, the City Council has considered whether this information you have requested may be exempt from disclosure under section 43(2) of the Freedom of Information Act 2000.

The reason we have considered this Exemption is on the basis that the requested information is commercially sensitive and relates to the financial and business affairs of the City Council and third parties in respect of commercial transactions both current and anticipated.

The use of Section 43 (2) of the FOIA requires the application of a public interest test. The City Council has considered the following public interest arguments in respect of releasing the information:

If details of the costs associated with this insurance were to be disclosed this would substantially impair and prejudice the ability of the City Council to conduct negotiations with third parties for similar insurance provisions and would therefore place the City Council at a substantial disadvantage when negotiating or entering into other similar commercial arrangements to secure replacement insurance provision. The basis is that this information when combined with information from other sources would identify the pricing methodology of the City Council and third party providers and result in substantial commercial prejudice

Liverpool City Council Information Team  
Cunard Building, Water Street, Liverpool, L3 1DS  
E: [informationrequests@liverpool.gov.uk](mailto:informationrequests@liverpool.gov.uk)

for future similar insurances. This in turn will place the City Council at a disadvantage when undertaking the procurement for renewal of these policies.

The effect of such disclosure would be potentially damaging to the City Council as the third party organisation(s) affected may well look to the City Council for compensation as a result of disclosure which could place the City Council under the threat of legal action.

As a counterpoint argument to these factors are that it is in the interest of the public to be clear what systems the City Council uses and their impact on the public purse. That this is of interest to the public is a matter of record, however the extent to which the level of detail request is of itself of public interest must then be weighed against the prejudice disclosure would have on current or future projects.

With these considerations in mind it is considered that the public interest in the disclosure of the information you have requested is outweighed by the non-release of the information as the effect of substantially prejudicing the City Council's ability to develop, negotiate and enter into arrangements for similar commercial and public sector support systems and that disclosure would raise a significant risk of potential legal action for breach of confidence.

Accordingly the City Council believes the public interest arguments in favour of withholding the information outweigh those in favour of releasing it and therefore withholds information relating to the remaining elements of your request.

This concludes our response.

In accordance with the application of Section 43 (2) of the Freedom of Information Act 2000 we have not provided all of the information requested. As such we are required to serve you with the following Section 17 Notice –

The City Council will consider appeals, referrals or complaints in respect of your Freedom of Information Act 2000 and you must submit these in writing to [Informationrequests@liverpool.gov.uk](mailto:Informationrequests@liverpool.gov.uk) within 28 days of receiving your response.

The matter will be dealt with by an officer who was not previously involved with the response and we will look to provide a response within 40 days.

If you remain dissatisfied you may also apply to the Information Commissioner for a decision about whether the request for information has been dealt with in accordance with the Freedom of Information Act 2000.

The Information Commissioner's website is [www.ico.gov.uk](http://www.ico.gov.uk) and the postal address and telephone numbers are:- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Telephone: 0303-123-113. Email – [mail@ico.gsi.gov.uk](mailto:mail@ico.gsi.gov.uk) (they advise that their email is not secure)

I trust this information satisfies your enquiry.

Yours sincerely

*A Lewis*

**Angela Lewis**  
**Information Team**

**Liverpool City Council Information Team**  
Cunard Building, Water Street, Liverpool, L3 1DS  
E: [informationrequests@liverpool.gov.uk](mailto:informationrequests@liverpool.gov.uk)

**MAVEN PUBLIC SECTOR LIABILITY POLICY  
SCHEDULE**

|                                  |   |
|----------------------------------|---|
| Policy Number                    | ██████████  |
| Policy Wording                   | Maven Public Sector Liability v2 0915   |
| The Insured                      | Liverpool City Council  |
| Insured Postal Address           | Cunard Building, Water Street Liverpool L2 2DH  |
| The Business                     | Unitary Authority   |
| The Underwriters                 | Maven Public Sector<br>Authorised and regulated by: Financial Conduct Authority   |
| Operative Sections               | Section 1, Employers' Liability Insured<br>Section 2, Public and Products Liability Insured<br>Section 3, Professional and Officials' Indemnity Insured   |
| Aggregate Self-Insured Retention | Amount GBP 6,200,000 Applicable to Claims under<br>Section 1, Employers' Liability Yes<br>Section 2, Public and Products Liability Yes<br>Section 3, Professional and Officials' Indemnity Yes  |
| Self-Insured Retention           | Amount Applicable to Claims under<br>GBP 1,000,000 Section 1, Employers' Liability (EL)<br>GBP 1,000,000 Section 2 Public and Products Liability (PL/P)<br>GBP 25000 Section 2 Hirers Liability<br>GBP 1,000,000 Section 3 Professional and Officials' Indemnity  |
| Territorial Limits               | <b>Section 1, Employers' Liability</b><br>(a) anywhere in the world provided that the Employee's employment or engagement is entered into in Great Britain, Northern Ireland, the Isle of Man and the Channel Islands; or<br>b) in Great Britain, Northern Ireland, the Isle of Man and the Channel Islands in respect of employment or engagement entered into outside these territories including temporary visits outside these countries other than back to the country of employment, or engagement<br><br><b>Section 2, Public and Products Liability</b><br>Worldwide<br><br><b>Section 3, Professional and Officials' Indemnity</b><br>Worldwide except the United States of America and Canada |

|                                   |  |                               |                  |
|-----------------------------------|--|-------------------------------|------------------|
| <b>Period of Insurance</b>        | From 1 <sup>st</sup> May 2019<br>To 30 <sup>th</sup> April 2020  | both days inclusive           |                  |
| <b>Premium</b>                    | Premium<br>Insurance Premium Tax at 12%<br>Total   | [REDACTED]                    |                  |
| <b>Insurers and Apportionment</b> | The liability of each of the insurers individually shall be limited to the proportion set against its name |                               |                  |
|                                   | <b>Insurer</b>   | <b>Proportion of Schedule</b> | <b>Reference</b> |
|                                   | XL Catlin Insurance Company UK Limited   | 71.4286%                      | TBA              |
|                                   | Aviva Insurance Limited  | 28.5714%                      | TBA              |
|                                   | <b>Total</b>   | <b>100%</b>                   |                  |

Maven Public Sector (hereinafter referred to as the Underwriters) underwrite and bind business under a delegated authority from the Insurers.

Remuneration Disclosure

When Maven Public Sector underwrite your policy the insurers pay us a percentage of the premium as a fee for the work we do on their behalf.

If certain profit targets are reached, the insurers may also pay us a bonus based on the overall performance of the book of business.

The premiums shown are inclusive of 3.5% brokerage to JLT.

## SECTION 1, EMPLOYERS' LIABILITY

Limit of Indemnity: GBP 35,000,000 any one claim or series of claims arising out of any one Occurrence

N.B. Sub-limits apply – these are listed later in this Schedule

Transfer of Undertakings  
(Protection of Rights)  
Regulations Retroactive Date  
(Section 1, Extension 2) None

## SECTION 2, PUBLIC AND PRODUCTS LIABILITY

|   | Limit of Indemnity |   |
|---|--------------------|---|
| 1. Public Liability   | GBP 35,000,000     | any one Occurrence  |
| 2. Products Liability (Personal Injury and or Property Damage caused by the Insured's Products) | GBP 35,000,000     | any one Occurrence and in the aggregate for the Period of Insurance |
| 3. Pollution Liability (Personal Injury and or Property Damage caused by Pollution)             | GBP 35,000,000     | any one Occurrence and in the aggregate for the Period of Insurance |

N.B. Sub-limits apply – these are listed later in this Schedule

Financial Loss Retroactive Date  
(Section 2, Extension 8) 1<sup>st</sup> May 2019

## SECTION 3, PROFESSIONAL AND OFFICIALS' INDEMNITY

Limit of Indemnity GBP 10,000,000 any one claim and in the aggregate for the Period of Insurance but subject to the sub-limits listed later in the Schedule

Retroactive Date

In respect of all claims arising other than from Professional Activities None

In respect of claims arising from Professional Activities None

### Sub-limits

- Sub-limits form part of the Limit of Liability and do not apply in addition to it
- Limits are exclusive of the **Self-Insured Retention** unless otherwise stated
- If more than one Sub-limit applies to the same loss, the Insurer's liability will be limited to the lesser Sub-limit.

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#### *In respect of Section 1, Employers' Liability*

|   | Limit of Indemnity |   |
|---|--------------------|---|
| Bodily Injury to any Employee whilst engaged in Offshore work | Nil                | any one claim or series of claims arising out of any one Occurrence |

#### *In respect of Section 2, Public and Products Liability*

|  | Limit of Indemnity           |  |
|--|------------------------------|--|
| Extension 2, Asbestos  | GBP 1,000,000                | any one occurrence and in the aggregate for the <b>Period of Insurance</b> |
| Extension 7, Financial Loss                                    | GBP 1,000,000                | any one occurrence and in the aggregate for the <b>Period of Insurance</b> |
| Optional Extension s<br>1 Excess Motor<br>2 Indemnity to Hirer | Not Insured<br>GBP 5,000,000 |  |

#### *In respect of Section 3, Professional and Officials' Indemnity*

|   | Limit of Indemnity |   |
|---|--------------------|---|
| In respect of claims arising from <b>Professional Activities</b>                | GBP 5,000,000      | any one claim and in the annual aggregate |
| In respect of all claims arising other than from <b>Professional Activities</b> | GBP 5,000,000      | any one claim and in the annual aggregate |
| Emergency Costs   | GBP 25,000         |   |



## **Endorsements**

### **Election Officials**

In respect of any indemnity requested by the **Insured** provided to **Election Officials** for legal liability arising in connection with the conduct of running any elections or referenda, the **Self-Insured Retention** is reduced to Nil subject to no other indemnity being available.

### **Schools Governing Bodies**

The Governing Bodies of VA schools advised by the Insured prior to inception as being included in the insurance programme are included as Persons entitled to indemnity under the policy.



## Claims Handling Agreement

In respect of the Claims Conditions – Procedures, any reference to the Insurer shall be deemed to include any party authorised to handle claims on the Insurer's behalf.

The Insurer has agreed to allow the Insured to handle claims that may be subject to an indemnity under this policy.

This In-House Claim Handling Agreement applies to the following only:

**All claims under Section 2 up to a Claims Handling Limit of £500,000 inclusive of fees any one Occurrence**

and is granted subject to the following provisions

- i) the extent of this agreement is limited to
  - (a) setting raising or amending appropriate reserves without the consent of the Insurer to a maximum amount of no more than the Claims Handling Limit shown above in respect of all claims relating to any one occurrence or claim provided that
    - (1) no suit or legal proceedings have been filed against the Insured and/or the Insurer
    - (2) no policy liability question is involved
  - (b) appointing any professional services which have been approved in writing by the Insurer prior to appointment in relation to claims which fall within the scope of item (a) above
  - (c) handling and settling any claim falling within the scope of item (a) above without the consent of the Insurer to a maximum amount of no more the amounts shown above in respect of all claims relating to any one occurrence or claim .
  
- ii) all claims falling outside the extent of the In-House Claim Handling Agreement detailed above must be reported in accordance with Policy conditions.
  
- iii) in any event as soon as the Insured has become aware that one of the following injury types has occurred
  - (1) a fatality
  - (2) an amputation of a major limb or paralysis or loss of use resulting in a disability rating exceeding 50%
  - (3) any serious head or concussive brain injury (including skull fracture or loss of sight of either or both eyes)
  - (4) any injury to the spinal cord and/or damage to vertebrae
  - (5) any disability where it appears reasonably likely that there will be a disability of more than one year
  - (6) any second or third degree burn of 25% or more of the body
  - (7) occupational disease
  - (8) complex regional pain (e.g. Fibromyalgia)
  - (9) injuries to pregnant women
  - (10) extensive nerve damage
  - (11) claims alleging a continuous exposure causing bodily injury or property damage
  - (12) employee harassment or termination of employment where bullying in the workplace or stress is alleged.
  - (13) any injury where Provisional Damages are applied for by the claimant
  - (14) any injury where any party or the Court indicates that regular continuing payments (such as Periodical Payments as defined in the Courts Act 2003) is a suitable form of settlement
  - (15) an arrest detention or assault
  
- iv) it is a condition of the Claim Handling Agreement that
  - (a) the Insured shall provide to the Insurer such information as the Insurer requires about the claims it is handling by virtue of this In-House Claim Handling Agreement irrespective of status at a frequency to be agreed by the Insurer. Prior to the granting of the In-House Claim Handling Agreement the Insurer will provide the Insured with details in writing of such information it requires in relation to all claims handled by the Insured.
  - (b) the Insurer or its authorised representatives shall have access to all records and data on any media relating to any or all claims the Insured handling by virtue of this In-House Claim Handling Agreement provided that the Insurer or its authorised representatives give no less than seven days' notice in writing of their intention to access such records and data
  - (c) the Insurer reserves the right to audit the in house handled files and any associated operational aspects as required by them.
  
- v) this In-House Claim Handling Agreement is provided subject to the Insured maintaining the following:
  - (a) A team of competent and experienced Claims Handlers with sufficient capacity to maintain an efficiency of workloads.
  - (b) Appropriate claims management systems which can achieve the quality of service required, including staffing numbers.

(c) Robust Claims Management systems which can record the claims management information in a manner acceptable to the Insurer.

At all times the Insurer retains the right to inspect and challenge any of the above aspects.

vi) under no circumstances does this In-House Claim Handling Agreement apply to sub-agents third party administrators brokers or others without the prior written approval of the Insurer.

vii) the Insurer reserves the right to withdraw this In-House Claim Handling Agreement by giving no less than seven days' notice in writing in the event that

- (a) any of the provisions contained in this In-House Claim Handling Agreement are breached
- (b) the amount paid in respect of all losses below the *retention* in respect of any one Period of Insurance exceeds 75% of any Aggregate Stop Loss shown in the Schedule

## Notes

The premium shown above and in the alternative options below includes an amount of up to £2,500 for risk control services as detailed in our tender submission.

## Long term agreement – Expiry Date 30<sup>th</sup> April 2022

Until the long term agreement Expiry Date shown above the Insured undertakes to offer to renew annually the insurance under this policy on the terms and conditions in force at the expiry of each Period of Insurance provided it is understood that:

The Underwriters are under no obligation to accept the offer to renew made in accordance with the above mentioned undertaking.

The Underwriters may increase the Aggregate Stop Limit at each renewal date by up to 10% following agreement to such increase by the Insured.

The above mentioned undertaking applies to any policy which may be issued by the Underwriters in substitution for this policy.

Payment of the premium as specified will be deemed acceptance by the Insured of the policy terms.

The Insured has the option to extend the expiry date by a further two years at its discretion.



Signed for the Underwriters and on behalf of the Insurers

Date: 30/05/2019



The Keeper of Records, Cosmic Gazette, do hereby certify the foregoing document is a true and correct copy of the original of the document recorded in public at cosmicessencepma.com

Witness my hand and official seal this 10 day of December, 20 25

Keeper of Records Cosmic Gazette,  
By CERK, TRUSTEE  
Trustee