

Direction 12 – in respect of final written and oral closing statements



In terms of section 17 of the Inquiries Act 2005 (“the Act”), Lord Brodie (“the Chair”) of the Scottish Hospitals Inquiry (“the Inquiry”) directs that:

1. Direction 11 is withdrawn.
2. The timetable provided by section 5 paragraphs d), e) and f) of Direction 10 is restored and accordingly:
 - 2.1 A written closing statement by Counsel to the Inquiry addressing all Terms of Reference relating to the Glasgow hospitals shall be submitted to the Solicitor to the Inquiry by 3pm on Friday **21 November 2025** for intimation to Core Participants;
 - 2.2 Written closing statements on behalf of Core Participants who wish to make them shall be submitted to the Solicitor to the Inquiry by 5pm on Friday **19 December 2025**;
 - 2.3 An oral hearing to hear final closing statements in respect of the aspect of the inquiry that relates to the QEUH/RHC will take place on **20, 21, 22 and 23 January 2026**.
3. Core Participants are reminded that any question relating to whether witnesses are being asked questions to which Core Participants object or are not being asked questions that it is believed they should be asked, or any other issue relating about the conduct of the hearing must be drawn to the Chair’s attention at the time the issue arises or made the subject of a formal Rule 9 application.
4. Whereas Core Participants may submit a written closing statement to the Solicitor to the Inquiry by **19 December 2025**:
 - 4.1 Where a Core Participant wishes to adopt, amend or supersede the terms of a previously submitted closing statement they should do so expressly
 - 4.2 These written closing statements must be formatted as Word documents which can be edited and formatted by the Inquiry for publishing purposes;
 - 4.3 Where passages of witnesses’ evidence are referred to or relied on they must be identified by the column numbers in the relevant transcript or paragraphs in the relevant witness statement;

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- 4.4 Where a document is referred to or relied on in these statements it must be identified by the numbers of the relevant bundle, volume (if applicable) and page or pages;
- 4.5 Where a Preliminary Position Paper (PPP) or expert report or a Core Participant's previous response to a PPP or expert report, is referred to or relied on, the relevant passage or passages should be identified by bundle, page and paragraph number;
- 4.6 Where a Core Participant refers to or relies upon a document which they have already submitted to the Inquiry, but is not included in an existing Hearing Bundle, they must make reference to that document in the same terms as it was submitted to the Inquiry in order that it can be identified and accessed. Documents should not be resubmitted to the Inquiry;
- 4.7 Where a Core Participant wishes to refer to or rely on a document which has not been submitted to the Inquiry they may only do so with the leave of the Chair, on application having been made to him.
5. Whereas Core Participants may include in their written closing statements such references to evidence and submissions as they consider relevant to the Inquiry's Terms of Reference, the Chair would wish that:
 - 5.1 Core Participants address all Terms of Reference in respect of which they consider that they have an interest;
 - 5.2 Where a Core Participant disputes the accuracy of the narrative or proposed findings set out in Counsel to the Inquiry's written closing statement, they should identify the relevant passage or passages, and explain the basis of and reason for the dispute under specific reference to such documents and witnesses' transcripts or statements on which they rely;
 - 5.3 Where a Core Participant proposes that the Chair should adopt a narrative or make findings additional to what is proposed by Counsel to the Inquiry, they should set out such narrative or findings under specific reference to the documents and witnesses' transcripts or statements on which they rely;
 - 5.4 Where it is proposed that the Chair should, for whatever reason, disregard any evidence heard or considered by the Inquiry or within PPPs or expert report a Core Participant should set out clearly and explicitly which evidence should be disregarded and why the Chair should do so by reference to that evidence and any other evidence or reason that is relied on.
6. Counsel to the Inquiry shall include in their closing statement proposed findings in fact in respect of the Remit and Terms of Reference of the Inquiry and such recommendations they propose should be made as provided for in Term of Reference 13. Such findings in fact and recommendations should be based on the whole of the evidence heard by the Inquiry. Core Participants

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who wish either to agree with or to challenge such proposed findings in fact and recommendations or propose additional or alternative findings in fact or recommendations should set that out expressly and explain the basis of their adopted positions in their written closing statements.

7. In addition to submitting written closing statements, Core Participants with leave to appear at the hearing, and who have given notice of their intention to do so, may, on **20 January 2026** and subsequent days make supplementary oral closing statements to the Chair. In respect of that oral hearing:
 - 7.1 Core Participants wishing to make a supplementary oral closing statement must give notice of their intention to do so to the Solicitor to the Inquiry on or before **9 January 2026**. Such notice should set out the period of time sought for their statement;
 - 7.2 On or before **14 January 2026** those Core Participants who have given notice of their intention to make a closing oral statement will be informed of the time available to them and the order in which they will be invited to speak;
 - 7.3 Counsel to the Inquiry shall make an oral closing statement.

Lord Brodie
Chair of the Scottish Hospitals Inquiry
1 September 2025