

## THE UK COVID-19 INQUIRY: MODULE 1

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### TRADES UNION CONGRESS SUBMISSIONS IN ADVANCE OF THE PRELIMINARY HEARING IN MODULE 1

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#### Introduction

1. On 21<sup>st</sup> July 2022 the UK Covid-19 Inquiry (“**the Inquiry**”) opened module 1, on the resilience and preparedness of the United Kingdom for a coronavirus pandemic. These submissions are made by the Trades Union Congress (“**TUC**”) in advance of the first preliminary hearing in module 1, and indeed the Inquiry as a whole, which will take place on 4<sup>th</sup> October 2022.
2. The TUC has now been designated as a Core Participant (“**CP**”) in module 1, and it is grateful to the Chair for this decision.<sup>1</sup> The TUC seeks to assist the Inquiry with its experience and expertise. The TUC brings together 5.5 million working people who make up its 48 member unions, from all parts of the UK. Each of the 48 member unions is listed as an annex to these submissions and, as the list makes clear, they span a wide range of industries profoundly affected by the Covid-19 pandemic, including many front-line roles.
3. Over 15,000 people of working age died in the pandemic, many of whom were key workers in high-risk workplaces in sectors such as health, social care, transport, food processing and textiles, a great many of whom were TUC members. Workers from ethnic minorities were particularly hard hit, with BME men 57% more likely to be working in jobs with a higher mortality rate, and BME women 48% more likely. As the TUC General Secretary, Frances O’Grady, put it in a joint statement released with the Covid Bereaved Families for Justice on Workers’ Memorial Day earlier this year, before the Inquiry’s Terms of Reference (“**ToR**”) were finalised,

*“We’ll forever be in the debt of the workers who kept the country going during the pandemic - nurses, carers, bus drivers, factory workers and so many more.*

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<sup>1</sup> The TUC was notified that its renewal application had been successful on Friday 23<sup>rd</sup> September 2022, and the reasoned decision has been provided today, 28<sup>th</sup> September 2022.

*Far too many were exposed to the virus at work - and lost their lives as a consequence. Now the government owes it to them, and to their families, to make sure the public inquiry investigates what should have been done to keep everyone safe at work.”<sup>2</sup>*

4. Since that time, the ToR were finalised and the Inquiry opened. The ToR describe the Inquiry’s overarching task as being to *“examine, consider and report on preparations and the response to the pandemic in England, Wales, Scotland and Northern Ireland, up to and including the Inquiry’s formal setting-up date, 28 June 2022.”* They expressly require the Inquiry to *“listen to and consider carefully the experiences of bereaved families and others who have suffered hardship or loss as a result of the pandemic,”* described rightly as a *“significant and important task”* in the Opening Statement.<sup>3</sup> Many thousands of TUC members died as a result of the Covid-19 pandemic, as we indicated above; tens of thousands continue to suffer the effects of long Covid and workplace injury during the pandemic; many are bereaved; many have suffered hardship or loss, in a myriad of ways. They undoubtedly fall within this express phrase in the ToR. Adapting the words of the General Secretary in April 2022, now the Inquiry owes it to them, and their families, to ensure that the Inquiry investigates what should have been done to keep everyone safe at work – and what should be done in future.
  
5. This is reflected in the second aim of the ToR, to identify the lessons to be learned to inform preparations for future pandemics across the UK, and they also expressly require the Chair to *“highlight where lessons identified from preparedness and the response to the pandemic may be applicable to other civil emergencies.”* This requires – rightly – broader lesson-learning than simply focusing on the potential for future pandemics. Many of the failures which were seen during the Covid-19 pandemic, in the TUC’s view, indicate risks which would apply in a range of other circumstances, including terrorist attacks, natural disasters, accidents and other civil emergencies.
  
6. Module 1 concerns a vital and urgent topic. As the Chair, Baroness Heather Hallett, said when opening the Inquiry and outlining this module, *“the Inquiry’s scope is broad,*

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<sup>2</sup> ‘On Workers’ Memorial Day, Unions and Bereaved Families Demand Covid Inquiry Seeks the Truth About Worker Deaths,’ 28<sup>th</sup> April 2022, <https://www.tuc.org.uk/news/workers-memorial-day-unions-and-bereaved-families-demand-covid-inquiry-seeks-truth-about>.

<sup>3</sup> At page 5.

*so we will start with the most pressing questions – was the UK prepared for a pandemic?”<sup>4</sup>*  
The TUC agrees that this is a pressing question, and considers that this module raises vitally important issues which should be considered as soon as possible.

7. The TUC has recently been granted CP status (on Friday 23<sup>rd</sup> September 2022), and has received the reasoned decision regarding the basis for this decision today (Wednesday 28<sup>th</sup> September 2022), and so these submissions are necessarily brief and in outline form. We anticipate that further instructions may be received before the hearing on 4<sup>th</sup> October 2022, in which case we will supplement these submissions orally where required. We also anticipate that, in respect of some matters, the TUC may wish to liaise with the Solicitor to the Inquiry (“STI”) and / or Counsel to the Inquiry (“CTI”) following the hearing, as we indicate below.
  
8. The TUC is conscious that the Inquiry team is working under considerable time pressure, and from the statistics given in CTI’s Note for module 1 it is clear that a great number of people and organisations have applied for CP status (130 in this module alone). The TUC is also aware that the Chair wishes to proceed speedily, and that substantial work is already underway. The TUC does not underestimate the number and scale of the tasks facing the Inquiry team. However, whilst understanding the pressures the Inquiry team is under, and without wishing to add to this burden, the TUC does respectfully request that steps are taken to allow more notice and longer timeframes so that adequate time is allowed to CPs to properly prepare and meaningfully participate. For this important first preliminary hearing, for example, the TUC has had only three working days between it being notified of having been granted CP status and receiving relevant documents, including the agenda for the hearing and CTI’s Note (Friday 23<sup>rd</sup> September 2022), and today’s deadline for filing submissions (Wednesday 28<sup>th</sup> September 2022). Three working days, without notice beforehand of this timetable would be difficult for any CP, in any circumstances, but as a representative body with a duty to consult its members, this is an impossibly tight timeframe. It is particularly difficult as this is at the outset of the TUC’s involvement, and documents could not immediately be shared with key officials at the TUC for instructions as they had not yet signed and returned a

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<sup>4</sup> Statement of 21<sup>st</sup> July 2022:  
<https://covid19.public-inquiry.uk/2022/07/uk-covid-19-inquiry-launches-first-investigation/>

confidentiality undertaking. In addition, the reasoned decision regarding the TUC's renewal application has just been received this afternoon, and it has required us to review and revise certain submissions which we make below, regarding the scope of module 1.

9. We emphasise that we do not make this submission to be critical of the Inquiry team, and we recognise the importance of CPs making arrangements to ensure that they can respond speedily given the Inquiry's overall timeframe and the Chair's recognition of the importance of avoiding undue delay. The TUC is acutely conscious of these factors, and so has made arrangements to be in a position to respond effectively and efficiently to the Inquiry despite its huge size and its millions of members, by setting up a Working Group structure. However, given the extremely short notice on this occasion, and as it is the TUC's first time to be designated a CP in the Inquiry, it has unfortunately not been possible to consider the issues fully and liaise within the Working Group in advance of these submissions being filed. This means that on a number of issues we can make only limited submissions at this stage. This is a general and important caveat which should be borne in mind when considering these written submissions.
  
10. This issue of timeframes/ notice for CPs is also a matter of significant concern to the TUC. The Inquiry has made clear its wish for collaboration and applications for CP status from groups where possible. This is an admirable and sensible aim, with which the TUC agrees. However, to make such an approach viable it is imperative that timescales are more realistic and fair to CPs. We ask that the Inquiry take this into account in setting timetables and giving notice to CPs going forward. We respectfully request that, routinely, the Inquiry allow 14 days between the provision of agendas and documents for CPs to consider in advance of a hearing, and the deadline for written submissions. The TUC recognises, of course, that sometimes this may not be possible and shorter notice may be required, but we ask that 14 days be the norm, and shorter periods the exception, and only where strictly necessary.
  
11. Against that backdrop, we address each of the headings in CTI's Note dated 22<sup>nd</sup> September 2022 in turn below.

**a. The Commencement of the Inquiry**

12. We are grateful for the update provided by CTI in respect of the commencement of the Inquiry and the broad intended shape of upcoming modules. We have no comment at this stage on the matters set out at [3] – [25] of CTI’s Note, save that we welcome the decision to avoid the Inquiry being exclusively England-centric, given its UK-wide remit. We note that the intention is for public hearings in modules 2A, 2B and 2C to take place in Scotland, Wales and Northern Ireland respectively, and we welcome this decision.
13. However, at this stage we note that it may be that, for certain later modules, the TUC will invite the Chair to consider sitting outside London for at least part of the public hearings. This may include requesting that the Chair consider sitting in Scotland, Wales and/ or Northern Ireland for parts of thematic modules (particularly ‘impact’ modules) rather than only for modules 2A, 2B and 2C which concern devolved governmental decision-making. We note that reference is made at [25] of CTI’s submissions to the Inquiry *“return[ing] to Scotland, Wales and Northern Ireland to address the local decision-making during the pandemic... and remaining devolved issues”* in *“later modules”* which is welcome, but the TUC asks that it be borne in mind that Scotland, Wales and Northern Ireland should not be considered as host locations only for topics exclusively regarding local and devolved decision-making. It may also be appropriate, for example, to consider part of an impact module sitting in one of those locations where there was a particularly adverse impact there, regardless of whether the focus is upon local decision-making or a UK-wide issue. London should not necessarily be the default location for all modules.
14. In addition, the TUC may later wish to request that the Chair consider sitting for at least part of the public hearings in later modules in another English city, other than London. This is not a submission we can make firmly at this stage, given the general caveat at the outset of these submissions: they have been prepared at speed, without the opportunity to fully consider this issue and discuss within the TUC’s Working Group. We anticipate, however, that this is an issue which may arise, as there are certain sectors which were significantly adversely impacted by the pandemic, and in

which workers faced increased risk of loss of life and other hardships, where some of the most profound impacts were felt in northern England. There are also particular issues arising regarding the failure to speedily respond to developments and patterns of infection from London in early to mid-2020 which may have saved lives in northern England: for example, situations in which a rapid lesson-learning process from London cases could have resulted in protective and preventive measures being introduced in northern cities for the same sector workers.

15. The symbolic importance of the Inquiry being seen to be a UK-wide Inquiry, and not London-centric is key to the Inquiry's credibility. We do not address this further at this stage, but simply note that this is a point of importance to the TUC to which we are likely to return. The Chair will also be aware that this was an issue raised by the TUC in its detailed consultation response earlier this year.

**b. Designation of Core Participants**

16. The TUC notes the information provided at [26] – [32] of CTI's Note. The TUC is one of those initially unsuccessful applicants whose reapplication was successful (see [30]). We are conscious, therefore, that the list of 26 CPs at [29] must now number at least 27, with the addition of the TUC, and we await to see the revised list when other reapplications have been considered.
17. However, from the available list of 26 CPs we note that it is currently very heavily weighted towards government and public bodies (21 of 26 CPs listed, i.e. over 80 per cent). It appears that only five CPs of the 26 - four bereaved family groups and Imperial College of Science and Technology - are listed as CPs who fall outside that category.
18. The TUC is concerned that this initial list, overall, appears skewed towards official, institutional CPs, and this concern is heightened by the fact that the TUC's application was initially rejected. It is recognised, of course, that determining CP status in this Inquiry raises particular challenges, as on one view every single person and every single organisation across the country was significantly affected by the Covid-19 pandemic, and so it is clear that something more must be required to ensure

the Inquiry is effective and the process manageable. There is also no question that, in module 1, all of those government and public bodies listed at [29] fit the criteria for CP status. Further, the TUC is aware of the Inquiry's ability to secure evidence and information from individuals or organisations without CP status. However, CP status carries certain key privileges, including the right to make submissions to shape the provisional scope outline itself (reserved to CPs and CTI, as the outline scope document makes clear), having access to all relevant disclosure within the module (again, only an entitlement for CPs), having the ability to test the evidence of institutional witnesses through the Rule 10 process, and through the making of opening and closing statements pursuant to Rule 11. Without an appropriate balance between governmental and non-governmental CPs, the TUC is concerned that the Inquiry may not be as effective as it could otherwise be. The Inquiry team (STI and CTI) can of course test evidence and pursue lines of inquiry which go behind evidence from governmental CPs, but there will be key information of which they are unaware, lines of inquiry which will not occur to them, and so on. The importance of CP status being granted to non-governmental entities (such as the TUC) and other non-official voices is vital. Whilst we are grateful that the TUC has now been granted CP status in this module, we are concerned to ensure that the Inquiry does not fall into a pattern of having the overwhelming majority of CPs being government and official bodies.

19. It may be that this concern will be addressed in light of the full, revised list of CPs for module 1, once available, or indeed that this concern will be assuaged once information is available regarding the many applicants whose applications were rejected (which may be for very good reason – we simply do not know). At this stage we raise this point as it is a potential concern which we hope can be addressed and resolved early in the lifetime of this important Inquiry.

20. Further, in respect of module 1 in particular, we ask for advance notice to be given to all CPs of the full, revised list of CPs, and for advance notice to be given of any oral renewal applications which will be heard on Tuesday 4<sup>th</sup> October 2022. This is because the TUC wishes to consider its position in advance and, as a representative body, it will be necessary to discuss this issue rather than simply wait and see what updates

are provided on the day of the preliminary hearing. We hope it will be possible to provide such an update, and any relevant documentation, by no later than Friday 30<sup>th</sup> September 2022. Although this would allow only one working day before the hearing, the TUC is making arrangements to prepare over the weekend and have a conference in advance of the hearing on Monday 3<sup>rd</sup> October 2022. We would be grateful for an advance update if at all possible.

**c. Scope of Module 1**

21. The TUC notes the explanation provided at [33] – [39] of CII’s Note. Prior to receipt of today’s reasoned decision concerning the TUC’s renewal application, the TUC would have agreed that the current provisional scope enables the key issues and matters to be addressed. However, today’s reasoned decision has prompted a number of queries and concerns, as we explain below.
  
22. The TUC supports the break-down into six specific matters to be examined, which are set out in the provisional scope decision. Of these six matters, topics 2, 4 and 5 are of particular relevance to the TUC:
  - Topic 2 – *“The Government structures and specialist bodies concerned with risk management and civil emergency planning... historical changes to such structures and bodies as well as the structures in place as at January 2020, inter-organisational processes and cooperation”*;
  - Topic 4 – *“Public health services... public health capacity, resources and levels of funding”*;
  - Topic 5 – *“Economic planning by relevant Government bodies, including capacity and spending commitments... in the context of emergency planning.”*
  
23. Further detail in respect of each of these three topics, and the direct and significant role which the TUC has played in respect of them since 2010, and its significant interest in these matters, was provided in its renewal submissions. The TUC is grateful to the Chair for reconsidering and exercising her discretion in favour of the TUC being a CP. However, having received the Chair’s reasoned decision today, there are two particular concerns which link to the question of the adequacy of the provisional scope outline:

(i) First, the Chair’s reasoned decision refers to the TUC’s extensive campaigning and policy work from 2010 – 2020 in relation to the growing NHS recruitment and retention crisis. It is said that this links in particular to topic 3 in the provisional scope outline. The TUC recognises that topic 3 does concern “resources,” but it is primarily focused upon pandemic planning, forecasting and learning from past simulation exercises. The TUC’s expertise and interest, and its role, is more directly linked to topic 4, it seems to us. It may be that this is simply a typographical error in the decision, but we raise it because, if not, we are unclear what topic 4 will be considering. Public health capacity and public health funding must take account of the issues raised in the TUC’s renewal submissions to meet the requirements of the ToR, address the issues in the provisional scope outline for module 1 and be effective. We would welcome clarification, given this confusion;

(ii) Second, the reasoned decision does not refer at all to the TUC’s detailed submissions regarding topic 2, and in particular “*specialist bodies concerned with risk management.*” It is unclear to us whether this was an oversight, or whether the Inquiry impliedly disagrees with the TUC’s submissions regarding topic 2. Should it be the latter, the TUC wishes to address the Chair at the hearing on 4<sup>th</sup> October regarding this matter. A brief summary is provided below, at [24].

24. Risk management, and failures in the risk management process, should be a key aspect of module 1, in our submission. The TUC has for over a decade been raising grave concerns that systematic underfunding of vital services, including safety regulators, places the UK at risk. The TUC’s view is that the UK’s pandemic preparedness was gravely undermined by a number of historical changes to risk management structures and bodies, and in addition by substantial cuts to their budgets. Funding cuts to the Health and Safety Executive (“HSE”) and local authority enforcement since 2010 seriously hindered the regulators’ ability to effectively prevent workplace hazards and deter employers from breaching regulations and the law. As explained in the renewal submissions, the TUC has produced detailed research reports on this topic in 2010, 2011, 2016, 2017, 2018 and, more recently, in 2021 (in a report which identified how HSE underfunding since 2010

had hindered the agency's RIDDOR reporting system for Covid infections and fatalities).<sup>5</sup> Put simply, the effects of cuts to funding resulted in fewer inspectors, fewer inspections and much less enforcement action prior to the pandemic, and gravely weakened the resilience and preparedness of risk management structures. This must be examined during module 1, and the TUC is concerned that today's decision makes no reference to it and suggests this is not a topic to be explored by the Inquiry.

25. Finally, in relation to the provisional scope outline, it is submitted that it would be preferable for topics 3 and 6 to refer to *"a pandemic, and other whole-system civil emergencies"* (topic 3) and *"future pandemics, and other whole-system civil emergencies"* (topic 6), but this does not appear essential given the phrasing of the opening paragraph, and the TUC understands that the particular focus will be upon the adequacy of pandemic-planning in the past and pandemic-planning going forward.

**d. Rule 9 Requests**

26. The TUC notes the update regarding Rule 9 requests, at [40] – [48] of CTI's Note, and agrees with all those entities listed. It is noted that it is planned to issue further Rule 9 requests on a rolling basis.

27. In the limited time available the TUC has not been in a position to consider this in detail, but it is anticipated that the TUC will wish to assist the Inquiry in identifying further entities and organisations of whom Rule 9 requests should be made in module 1.

28. At this stage, it is noted that a Rule 9 request should certainly be made of the HSE in this module, although bearing in mind the iterative approach this may not be needed immediately. This point is linked to the submissions made briefly above, and in more detail in our renewal submissions, regarding topic 2 in the provisional scope outline, risk management.

29. The TUC will make further suggestions as it undertakes further work on this module.

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<sup>5</sup> See Annex 1 to the TUC's renewal submissions.

30. In respect of Rule 9 requests already made, the TUC requests that the Inquiry provide CPs with early disclosure of the requests themselves. This step has been taken in other inquiries, and it allows for early identification by CPs of potential gaps in Rule 9 requests, and for submissions to be made to STI where necessary. Given the tight timeframe for this module, with the intention being that the final hearings will take place in May 2023, it would be prudent to disclose these letters as soon as possible, to avoid delays at a later stage.

31. The TUC is also, of course, willing to provide evidence to the Inquiry in this module, and suggests any Rule 9 request of it be made at a later stage in the iterative process, so that it can consider and respond to institutional evidence, particularly in respect of topics 2, 4 and 5 in the provisional scope outline.

#### **e. Disclosure**

32. The TUC notes the outline regarding the disclosure process, at [49] – [52]. The TUC makes two short points.

33. First, it is suggested that a sensible course, in addition to the proportionate and focused suggestion at [50], would be to also prepare a schedule of undisclosed material/ schedule of unused material, for disclosure to CPs. This would provide a safety net so that CPs could review the table and make submissions, if appropriate, regarding any particular further documents. Such a process has worked well in other inquiries and large-scale inquests, such as the *Hillsborough Inquests*.

34. Second, in respect of the process described at [50], the TUC asks for further information regarding the decision-making of the Inquiry concerning disclosure and the filter which will be applied. The factors listed are expressed in very general terms, and we are not aware of a detailed Disclosure Protocol having yet been produced which grapples with these issues in more detail. In essence, as [50] suggests certain relevant material may be withheld from CPs, the TUC seeks clarity on the basis for this, and further detail explaining the proposed approach.

#### **f. Expert Witnesses**

35. The TUC is grateful for the summary provided at [53] – [61] of CTI’s submissions. This is being carefully considered in advance of the hearing on 4<sup>th</sup> October 2022. Should the TUC wish to raise any points at the hearing in this regard, it will do so, although it is anticipated that this is a topic on which the TUC is more likely to follow up at a later stage, in correspondence. The TUC does have significant experience in working with experts in a number of these fields and may be able to assist the Inquiry with identifying appropriate potential experts.

#### **g. The Listening Exercise**

36. The TUC makes two short points regarding the Listening Exercise at this stage.

37. First, the TUC is keen to understand more regarding this process, as it is likely that TUC members and member unions may wish to contribute and could assist the Inquiry in this regard. Bearing in mind the ToR’s reference to the importance of hearing from those who have suffered hardship and loss, the Listening Exercise potentially provides an important opportunity to hear directly from many workers who had devastating experiences during the pandemic. The TUC wishes to engage further with the Inquiry team on this matter, to consider how best to engage and support its members.

38. Second, the TUC also wishes to have some further detail regarding how it is intended that “*summary reports*” from the listening exercise will be “*aligned and fed into*” future modules (at [64]). The TUC is conscious that a listening exercise (the Truth Project) was undertaken in the Independent Inquiry into Child Sexual Abuse (“*IICSA*”) and has views on the effectiveness of that process, and its suitability in this different context. We would be grateful for further detail so that we can make informed submissions to assist the Inquiry.

#### **h. Commemoration**

39. This is a particularly important topic, and one on which the TUC wishes to carefully reflect, having had sight of the Inquiry’s position regarding a potential commemorative memorial and other steps, and having seen the position regarding

pen portraits. The TUC is not in a position to address this in writing at this notice, but is considering this carefully and anticipates being in a position to address this briefly at the hearing on 4<sup>th</sup> October 2022.

**i. Future Hearings**

40. The TUC notes the future dates indicated by CTI, and is grateful for this. However, the TUC makes two points, one concerning the proposed next preliminary hearing and one concerning the proposed final public hearings.

41. First, the TUC has raised in these submissions a number of concerns regarding notice and the absence of certain information at this stage. These are not criticisms of the Inquiry team, we emphasise – we realise that the Inquiry is in its early stages, and the hearing on the 4<sup>th</sup> October 2022 is likely to be focused on providing an initial outline of the proposed plans, and an update of the substantial work which is underway. However, we – and, we anticipate, other CPs – are in no position to address basic questions at the hearing on 4<sup>th</sup> October 2022. For example, we have not had sight of the Rule 9 requests already made, and thus we are not in a position to identify any gaps in what has been requested. We do not yet have sight of any disclosure. It may be that other CPs wish to raise concerns regarding the provisional scope outline; we do not know. We are concerned that it appears to be proposed that there be only one further preliminary hearing, in early 2023, and then the final hearing in May. If the next preliminary hearing is in February/ March 2023, it will by that time be too late to identify major gaps in the evidence-gathering process or the disclosure to date, or suggest further experts.

42. Thus, and particularly given the constraints to the hearing on 4<sup>th</sup> October 2022, we suggest a sensible course would instead be to list two further preliminary hearings before the May hearings: one in December 2022 (or possibly very early January 2023, if this is not feasible), and one c. March 2023. A second preliminary hearing in this module in December 2022 would allow CPs 8-10 weeks to consider the updates provided at the 4<sup>th</sup> October hearing, begin to consider the rolling disclosure, review the Rule 9 requests made (should the Chair agree with our request that they be disclosed), and so on, but also allow sufficient time for submissions made at that

hearing to be actioned before the May hearings (five months later). A third preliminary hearing c. 10-12 weeks later, in early March 2022, would allow for follow-up, addressing further issues which have arisen by then, and, we expect, issues such as which witnesses should give oral evidence at the May hearings, what evidence should be read, timetabling and housekeeping matters.

43. The second issue concerns the final hearings themselves. It is said that the module 1 hearings will commence in May 2023 and last for four weeks. The TUC is concerned that four weeks seems to be a very tight timetable for this module, particularly given the six important topics which are to be addressed, according to the provisional scope outline. On this timetable, each of those topics would need to be covered in approximately 3 days of oral evidence, and possibly less. Given the number of CPs it also seems likely that opening and closing statements would be very heavily truncated if the hearing were to remain as a four week listing only. The TUC does not consider this to be an adequate timeframe to address the issues in the provisional scope outline. Subject to instructions from the TUC Working Group, and further consideration of this issue, it is suggested that the public hearings for this module be expanded to at least six weeks – we simply do not think four weeks would allow for anything other than a superficial review of the issues in the (rightly) ambitious scope outline. We suggest, however, that a longer timeframe of 8-10 weeks would be more realistic and appropriate.

44. We will consider these issues further in advance of next week’s hearing, and we will supplement these initial written submissions orally where possible.

**CAOILFHIONN GALLAGHER KC**  
**SAMUEL JACOBS**

**28<sup>th</sup> September 2022**

## THE UK COVID-19 INQUIRY: MODULE 1

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### ANNEX

#### THE TUC UNIONS

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- o Accord – Lloyds Banking Group, TSB and other financial services
- o Advance - Santander and Santander businesses in the UK
- o Aegis - Finance sector staff at Aegon UK, Atos UK, Skipton Building Society, Yorkshire Building Society
- o AEP – Educational psychologists and assistant educational psychologists in public and private sector
- o AFA-CWA – Mobile civil aviation workers (flight attendants/cabin crew)
- o Artists’ Union England – Freelance visual artists, applied arts, sound and performance
- o ASLEF – Railways – drivers, operational supervisors and staff
- o BALPA – Airline pilots; commercial helicopter pilots; and technical rear crew
- o BDA – Dieticians in the public and private sector
- o BFAWU – Workers in food industries
- o BOSTU – Orthoptists
- o Community – General union covering a range of sectors including steel and other metals, third sector and logistics
- o CSP – Chartered physiotherapists, physiotherapy students and support workers
- o CWU – BT, O2, Post Office, Royal Mail Group and other telecoms companies
- o EIS – Teachers, lecturers, associated educational personnel in Scotland
- o Equity – Professional performers and creative practitioners
- o FBU – Fire and rescue services
- o FDA – Senior staff in civil service, public bodies and NHS
- o GMB – General union covering a range of sectors, including social care, manufacturing, energy and public services
- o HCSA – The hospital doctors’ union
- o MU – Musicians including live and recording artists, composers, teachers and writers

- o NAHT – Head teachers, deputies, assistant head teachers and school leaders across sectors
- o NAPO – Probation and family court staff
- o NARS – Racing staff employed by licensed racehorse trainers
- o NASUWT – Teachers and head teachers in all sectors from early years to FE across the UK
- o Nautilus International – Merchant navy and all related areas
- o NEU – Teachers, headteachers, lecturers and support staff in all education sectors
- o NGSU – All staff at the Nationwide Building Society
- o NHBCA – All staff at the National House Building Council
- o NSEAD – Art, craft and design educators across all phases and sectors
- o NUJ – Journalists, copywriters, designers, presenters, producers and website content providers
- o NUM – Coal mining and associated undertakings
- o PCS – Government departments and agencies, public bodies, private sector IT and other services
- o PFA – Professional football
- o POA – Staff in penal or secure establishments or special hospitals
- o Prospect – General union covering a range of sectors, including creative industries, defence, scientific and professional staff and energy
- o RCM – Practising midwives and maternity support workers in the UK
- o RCP – NHS, independent practice and private chiropodists and podiatrists
- o RMT – Railways, underground, metro, bus, road transport, taxi, maritime and offshore
- o SoR – Radiographers and related staff in NHS
- o TSSA – Administrative, clerical, professional and technical employees of railways, buses, London Underground, travel trade
- o UCAC – Teachers, headteachers, education advisors and lecturers across all sectors in Wales
- o UCU – Academic and related staff in HE, FE, land-based, adult and prison education.
- o UNISON – General union covering a range of sectors, including local government, health and social care, utilities, energy, education and voluntary sector
- o UNITE – General union covering a range of sectors, including manufacturing, aerospace, aviation, transport, voluntary and public services



- o URTU - Drivers, ancillary and warehousing workers in the logistics and food sectors
- o USDAW - Call centres, catering, distribution, food processing and manufacturing, retail and warehouses
- o WGGB - Writers working in TV, radio, film, books, theatre, comedy, video games and multimedia