

Witness Name: Rebecca Goshawk  
Statement No.:  
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**UK COVID-19 INQUIRY – MODULE 2**

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**WITNESS STATEMENT OF REBECCA GOSHAWK, SOLACE WOMEN'S AID**

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I, Rebecca Goshawk, will say as follows: -

1. I am Head of Public Affairs and Partnerships at Solace Women's Aid, United House 39-41 North Road London N7 9DP. My role involves working in partnership to harness the expertise of those within the VAWG sector and beyond to benefit the lives of women and children. We seek to change policy and legislation to support and improve the lives of survivors of domestic abuse and sexual violence. I have worked at Solace since September 2020 and gathered insight from colleagues who worked in the organisation for the duration of the pandemic including the first use of non-pharmaceutical interventions.
2. I make this statement in response to the Request for Evidence by the Chair of the UK Covid-19 Inquiry.
3. In accordance with the request, my statement will provide an overview of the impact of Government decision making on women and children, with respect to gender based violence and harms. It will also consider whether women and children were adequately considered when decisions about the response to Covid-19 were made by the UK Government.
4. This statement outlines the impact that the Government's decision to bring in non-pharmaceutical interventions in March 2020, and at subsequent points in 2020 and 2021 as well as wider decision making around repurposing of public resources. Whilst I make no view on the appropriateness of the decisions on non-pharmaceutical interventions, I have outlined what impact this had on women and children with respect

to gender based violence and harms, and set out where further mitigations should have been taken by Government to limit the impact when this decision was made.

### **Brief overview of Solace Women's Aid**

5. Solace Women's Aid (SWA) were granted Core Participant Status in Module 2 of the Inquiry on 13 October 2022.
6. SWA was established over 48 years ago and is one of the single largest providers of services for survivors of violence against women and girls in the UK. We were established to prevent violence and abuse, and provide services to meet the individual needs of survivors, predominantly women and children. SWA's mission is to end the harm done through gender-based violence and to work alongside survivors to achieve independent lives free from abuse. Our aim is to work to prevent violence and abuse as well as providing services to meet the individual needs of survivors, particularly women, young people and children.
7. The legal status of SWA is as a registered charity and company limited by guarantee.
8. SWA's services are concentrated in London, and our services include refuge and move on accommodation; community-based services; therapeutic services; North London Rape Crisis Centre; specialist provision for children and young people who have experienced domestic abuse or sexual violence; accommodation and support for victim/survivors who have experienced multiple forms of disadvantage; advice lines; prevention work with children and young people; and bespoke training for statutory agencies, third sector organisations and corporations.
9. We run 22 refuges, offering 178 rooms for women and children, including a specialist refuge for women with mental health difficulties and substance abuse issues. We also run specialist housing and support projects for particular groups of survivors including women who are street homeless, older women, children and young people, young black and ethnic minority women, and Irish travellers. We run the East London Advice Line and the North London Rape Crisis Centre.
10. In 2020, we supported 10,692 survivors of domestic abuse through advice, advocacy and support and accommodated 920 women and children in refuges. SWA supports individuals who are survivors of abuse, particularly women, young people and children.



We have an inclusive definition of women to include trans women. Our services seek to support and represent trans women and non-binary people.

11. We support survivors experiencing homelessness and those who have No Recourse to Public Funds (“NRPF”). We support migrant women and women from black and minoritised backgrounds. Many of those SWA support face intersectional discrimination and come from working-class households. We also support women who commonly suffer from poor mental and physical health as a result of the abuse they have suffered.
  
12. During the pandemic SWA and Southall Black Sisters (“SBS”) launched a Crisis Project offering safe emergency accommodation with specialist support to women and children fleeing domestic abuse and other forms of VAWG across London during the pandemic. The project initially provided a further 70 emergency refuge bedspaces across London up to November 2020 and 30 bed spaces from November 2020 to September 2021. During our time at the project, we offered women therapeutic support, assistance from specialist refuge workers and resettlement support. This project provided much needed increased capacity at a time where refuges were not seeing women move on and therefore new spaces were not becoming available and when there was a lack of response from some statutory agencies. The project provided accommodation and wrap around support to 205 women from May 2020 to September 2021 including 73 with NRPF. Specifically the project included funding for subsistence for women with no recourse to public funds. The project was funded by the Mayor of London (Mayor’s Office for Policing and Crime “MOPAC”) and a charitable body (RG/1).<sup>1</sup> Funding from the Ministry of Housing, Communities and Local Government was also used to fund this project following its initial launch.

## Summary

13. SWA was granted Core Participant status because the Chair considered that we were “well placed to assist the Inquiry as to whether the interests of women were considered as part of the process of core political and administrative decision-making in response to Covid-19”<sup>2</sup>. We hope to provide that assistance.

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<sup>1</sup> See [Southall Black Sisters and Solace launch COVID-19 Crisis Project to create urgently needed safe housing - Voice Online \(voice-online.co.uk\)](#)

<sup>2</sup> Notice of Determination 13 October 2022.

14. Victims and survivors of domestic abuse experienced a dual pandemic: violence against women and girls (declared as a global health problem of epidemic proportions by the World Health Organisation in 2013)<sup>3</sup> and the coronavirus pandemic (RG/2). As a result, the rise of women and girls experiencing the first pandemic (domestic abuse and violence) increased with the measures taken to tackle the second pandemic (lockdown). The title of SWA's publication analysing lockdown measures and the increase in domestic abuse sums up the position of women and girls who experienced domestic abuse: "*When I needed you to protect me, you gave him more power instead*" (RG/3).<sup>4</sup> Sadly, the inherent nature of lockdowns and social distancing measures meant that domestic abuse was always going to increase. However, SWA believes that the failure to provide victims with clear routes out of unsafe accommodation meant that the intensity and the prolonged nature of the abuse suffered was both foreseeable and to a large extent preventable.
15. The impact of Covid-19 and associated restrictions cannot be overstated in relation to the scale of abuse and violence victim survivors were subjected to; the challenges in accessing safety mechanisms; the ways in which they were able to access support (or not); how survivors were identified by others as vulnerable; the impact it has had on survivors' mental health and the long-term impacts it will continue to have as a result of the trauma experienced under lockdowns. The economic downturn and job losses caused by the pandemic also created the conditions associated with an increase in VAWG.
16. As mentioned above the VAWG sector has been seeking to tackle and address and deal with a dual pandemic; the VAWG pandemic declared by the World Health Organization in 2013, as well as the Covid-19 Pandemic.
17. In summary, the evidence that we wish to draw attention to is as follows:
- a. That the government failed to anticipate, or plan for, an increase in domestic abuse as a result of lockdown (see paras 180 – 183);
  - b. That the government failed to consult ourselves, and/or other organisations in the Violence Against Women and Girls ("VAWG") sector (see paras 154 – 160);
  - c. That the government failed to fund services responding to the rise in domestic abuse adequately, initially not recognizing the need for extra

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<sup>3</sup> [Violence against women: a 'global health problem of epidemic proportions'](https://www.who.int/news/item/28-11-2019-violence-against-women-a-global-health-problem-of-epidemic-proportions) (who.int)

<sup>4</sup> SWA March 2021

resources at all, and only doing so after threats of legal action had been made (see paras 182-183);

- d. That the Government failed to mitigate against the acute hardship suffered by migrant women with NRPF during the pandemic, and take steps to protect them (see paras 184 – 190);
- e. That the government failed to provide clear messaging so that victims of domestic abuse were not informed that they could leave their homes in order to seek help (see paras 161 – 171);
- f. That the government’s messaging, such as the #Youarenotalone campaign, was insufficiently publicized and came too late (see paras 161 – 171);
- g. That these failures were repeated throughout 2020, when the government was making decisions on regional lockdowns, Tier lockdowns, and subsequent national lockdowns (see paras 169 – 171);
- h. That the Government failed to consider the long term impact that the pandemic would have on survivors and take steps to provide the necessary resources to ensure that VAWG organisations could recover from the increased need and demand\_(see paras 202 – 207).

18. I conclude, at paras 212 – 214, with a summary of actions that ought to have been taken, which SWA would wish the Chair to consider and recommend, and which we hope Government will consider.

**Context: domestic abuse and services supporting survivors prior to pandemic**

Domestic abuse

19. Domestic abuse can be physical, emotional, psychological, financial, or sexual which takes place within close relationship, usually by partners, ex-partners or family members. As well as physical violence, domestic abuse can involve a wide range of abusive and controlling behaviour, including threats, harassment, financial control and emotional abuse.

20. Physical violence is only one aspect of domestic abuse and an abuser’s behaviour can vary, from being very brutal and degrading to small actions that leave you humiliated. Those living with domestic abuse are often left feeling isolated and exhausted. Domestic abuse also includes cultural issues such as so called ‘honour’ based violence.

21. Domestic abuse is a form of gender-based violence as it predominantly affects women and girls. For that reason, whilst recognising that domestic abuse can also affect men, I refer throughout to women and/or women and girl survivors of domestic abuse. Migrant women subject to domestic abuse face further disadvantage, particularly if they have no recourse to public funds as the fear of immigration enforcement is being weaponised by perpetrators of abuse. Many women with no recourse to public funds have few options to access support due to restrictions on their ability to access benefits or homelessness assistance leaving them economically vulnerable and without a safety net. During the Covid-19 pandemic the Government was asked to protect migrant victims of domestic abuse in the particular circumstances of the pandemic by lifting the no recourse to public funds conditions. The Government made a conscious decision not to do so, despite significant concerns raised by the specialist VAWG sector and others. This has been explored in further detail below (see paras 184 – 189).
22. Victims of domestic abuse need access to a range of services to meet their needs. This includes access to helplines and advice lines for immediate guidance, safe accommodation including refuges and advocacy support in a community setting including: safety planning; housing support; financial support and access to benefits; debt advice; support to access legal support for criminal and family proceedings; support to gain protective orders and report to the police; immigration support; support to access other statutory services such as health services including mental health, children's social care; and support to navigate the criminal justice system. Domestic abuse victims can also benefit from legal advice and support, counselling, group work, support into employment, access to drug and alcohol services. It is also crucial that perpetrator intervention services are available to prevent further harm by individuals. Women should be able to access these from specialist VAWG services and from 'by and for' organisations who support particular groups e.g. Black and minoritised victims, LGBTQ+ victims and disabled victims.
23. It is crucial that the response to VAWG takes an intersectional approach and recognises that women's experiences need to be understood as a whole taking into account how their ethnicity, any disability, sexuality and age can impact on their experience of abuse, how they seek support and their experience of being supported. It also must be recognised that women's experience of abuse and misogyny can be exacerbated due to discrimination they face due to other protected characteristics. An intersectional response recognises

that women's experiences must be addressed comprehensively, and through a needs led approach.

24. An important way to seek to address the intersecting oppressions that women face is to provide domestic abuse support for women from 'by and for' organisations that support marginalized groups. 'By and for' VAWG organisations are designed and delivered by members of the communities they aim to serve, and are delivered for women in those communities, which means they have an in-depth understanding of multiple forms of discrimination experienced by women and are trusted by women in the groups they serve. Additionally they can provide culturally sensitive and linguistic support.

Domestic abuse services prior to pandemic: impact of austerity

25. Before the pandemic began, the VAWG sector was woefully under-funded and struggling to provide support to all survivors of domestic abuse. I refer to the report *Life-Changing and Life-Saving<sup>5</sup>* (exhibited at RG/4) which recorded (in 2018) that over three quarters of councils had reduced the amount they spent on domestic violence refuges since 2010 and that total spending on refuges had reduced by 24% since 2010 (from £31.2 million in 2010/11 to £23.9 million in 2016/17). I also refer to *The Domestic Abuse Report 2019: The Annual Audit<sup>6</sup>* (exhibited at RG/5) which found that, between 2017 and 2018, the number of bed spaces in England fell short of the number recommended by the Council of Europe by 1,715 bed spaces.<sup>7</sup> It also found that there had been a decrease in the number of organisations providing domestic abuse services and in refuge services.

26. As a result all types of services, such as resettlement services, support and specialist services, available for women survivors of domestic abuse had decreased. Most notably, there had been a reduction of therapeutic service with a loss of 18.1% of counselling services during the year. Respondents to the audit commented that funding cuts and uncertainties were their biggest challenges, over half (56.7%) had been running an area of their domestic abuse without any dedicated funding, 20.6% received no local authority funding for community based services and 9.1% received no local authority for refuge services. As a result, services were finding it difficult to recruit and retain staff, they were having to reduce staff salaries and reduce the staff time available to support each survivor.

<sup>5</sup> Women's Budget Group & Women's Resource Centre, December 2018

<sup>6</sup> Women's Aid, 2019.

<sup>7</sup> Bed spaces had actually increased by 15, but as the population had increased at the same time, the shortfall had increased by 20.

However, demand continued for domestic abuse services had not decreased, and continued to be high.

27. The report of Imkaan (see paras 35 and 55) *The Impact of the Dual Pandemics: Violence against Women & Girls & Covid-19 on Black and Minoritised Women and Girls*<sup>8</sup> (exhibited at RG/6) identifies the additional pressure before the pandemic on the specialist black and minoritized refuge sector. They received less funding (in 2018, 25 black and minoritized women's refuges shared an income of £10 million, equating to an average annual turnover of £400,000 where 10 generic refuges shared an income of £25 million, equating to an average annual turnover of £2.5 million). Black and minoritised women were more likely to be turned away from refuges. One-third of specialist refuges for black and minoritized women were decommissioned under austerity, resulting in a loss of 50% bed spaces.

28. SWA's own experience mirrors this. In real terms, we have seen local authority funding for our domestic abuse services decrease with funding decreased or stayed static during the 2010s. This has meant we have faced increased costs whilst being expected to provide a similar service for the same funding.

#### Services provided by statutory authorities to survivors of domestic abuse: impact of austerity

29. In addition, cuts to local government finances from 2010 have been well documented.

Those decisions to defund public services, particularly local authorities who provide housing support, children's services, social care and commission domestic abuse services and the reduction of funding in the provision of women's services have had several consequences. It has meant that the VAWG voluntary sector has been under increased pressure with more demands for our services (despite the cuts experienced by ourselves). The reduction in funding statutory services has left areas such as housing and mental health, including CAMHS, stretched and becoming increasingly difficult to access. This has meant that domestic abuse services have to provide increased advocacy to ensure survivors get access to these vital services.

30. Austerity measures and poverty have also increased pressures on both women and men, and can lead to a rise in domestic abuse.<sup>9</sup> Cuts to local government have also meant that

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<sup>8</sup> Imkaan May 2020

<sup>9</sup> Referred to by Dr Clare Wenham, *Expert Report for the UK Covid-19 Public Inquiry: Structural Inequalities and Gender*, para 47.



organisations providing support to survivors of domestic abuse were already weak and vulnerable when the pandemic occurred.

31. In relation to women's experience of seeking support from local authorities for housing and homelessness, we conducted research over the summer of 2019 including a survey of around 100 women, and found that 30% of women seeking shelter from local authorities were turned away six times or more; 53% of women who had secure tenancies lost them after fleeing abuse and 62% of those seeking help from a local authority had a bad experience (*Safe at Houses – exhibited at RG/7*).<sup>10</sup> This problem preceded the pandemic and was not addressed despite the increased need.
32. Another example is that many women we supported faced considerable “gatekeeping” from local authority housing departments when fleeing domestic abuse. “Gatekeeping” is the term commonly used when local authorities place bureaucratic or other obstacles in the way of those seeking statutory support, such as requiring them to produce evidence of domestic abuse before providing accommodation, failing to provide emergency accommodation at all, and failing to apply the law and guidance on domestic abuse (RG/8).<sup>11</sup>
33. In 2020/21, 55% of women we supported had children with them. Women who are survivors of domestic abuse are placed in an extremely difficult position, and faced with an extraordinary and stressful decision. Do they remain in the home so their children have a settled life, or do they leave into potential an unsecure future and insecure housing? (RG/9)<sup>12</sup>
34. This situation is, in part, a product of the national housing crisis as the severe shortage of social and affordable housing in London had also led to housing officers in many areas increasingly gatekeeping and at times “gaslighting” (refusing to believe) rather than supporting survivors. The Covid-19 pandemic (and the NPIs) exacerbated an already fragmented and underfunded system. Gatekeeping practices in housing offices when domestic abuse survivors approach the local authority for support has always been a

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<sup>10</sup> Solace Women's Aid, 2019. [https://www.solacewomensaid.org/sites/default/files/2019-10/Solace\\_SafeasHousesReport\\_FINAL\\_0.pdf](https://www.solacewomensaid.org/sites/default/files/2019-10/Solace_SafeasHousesReport_FINAL_0.pdf)

<sup>11</sup> See *'Abused Twice': the 'gatekeeping' of support for domestic abuse survivors in every London borough*, Public Interest Law Centre, September 2022. While the report was researched and published during and subsequent to the pandemic, the accounts in the report reflect common practice in London boroughs prior to the pandemic as well,

<sup>12</sup> [https://www.solacewomensaid.org/sites/default/files/annual\\_report\\_2020\\_v5-compressed\\_1.pdf](https://www.solacewomensaid.org/sites/default/files/annual_report_2020_v5-compressed_1.pdf)

systemic issue across the country, and particularly acute in London where there are significant housing supply issues. Women making applications to housing departments have been told to return to perpetrators by housing officers; they have had the police called to verify their description of events; and some have even had perpetrators called directly by housing officers, putting them in greater danger if they were to return (RG/10).<sup>13</sup>

35. Imkaan has also reported on patterns of systematic and institutional failures and discrimination by public authorities when dealing with black and minoritized women's cases of violence, before the pandemic. The research cited found failures in providing interpreting services, gatekeeping practices, systematic failures to believe black and minoritized women's experiences of violence, failure to fairly assess housing support eligibility of women with EEA passport or family dependent visas; poor vulnerability assessments conducted on a discretionary basis, failing to take account of intersecting needs, discrimination and mistreatment by housing officials based on race, immigration status, proficiency in English language, and moving black and minoritized women and their children to unsuitable and unsafe accommodation (RG/6).<sup>14</sup>

#### Domestic Abuse Act 2021 (DAA 2021)

36. The Domestic Abuse Bill was introduced into Parliament on 3 March 2020, having previously been considered by Parliament in 2019 but falling because of the December 2019 general election. It received Royal Assent on 29 April 2021. We were proud to have been part of a sector that worked tirelessly and with enormous patience and persistence to make huge improvements to the legislation over those four years and as it made its passage through parliament. During Covid-19, SWA provided briefings for peers as the Bill went through the House of Lords in 2021. We had also submitted evidence to the Government consultation on the Bill in 2018, and were involved in some sector briefings and recommendations on the Bill from its draft stage in 2019, as well as providing joint evidence to the Commons Public Bill Committee and to the House of Lords (RG/12).<sup>15</sup>

37. Important measures in the DAA 2021 include for the first time, a definition of domestic abuse in law, which recognizes emotional and economic abuse as well as coercive control

<sup>13</sup> [https://www.solacewomensaid.org/sites/default/files/solace\\_vawghousing\\_final\\_resup10125-compressed\\_1.pdf](https://www.solacewomensaid.org/sites/default/files/solace_vawghousing_final_resup10125-compressed_1.pdf)

<sup>14</sup> *The Impact of the Dual Pandemics: Violence Against Women & Girls & Covid-19 on Black and Minoritised Women & Girls*, Imkaan, May 2020, referring to *A Roof not a Home*, Women Against Homelessness Action 2019.

<sup>15</sup> <https://publications.parliament.uk/pa/cm5801/cmpublic/DomesticAbuse/memo/DAB32.pdf>



as forms of domestic abuse, recognising children as victims if they see, hear or otherwise experience the effects of abuse, giving automatic priority need to people made homeless by domestic abuse, and ensure security of tenure for survivors who have had to flee their homes as result of abuse. The Act also enshrines the role of the Domestic Abuse Commissioner as an independent voice who would, for the first time, speak for victims and survivors. The Commissioner was appointed as “designate Domestic Abuse Commissioner” in 2019 and her role was placed on a statutory footing by the DAA 2021. She has powers to gather information and data on the national picture of need and provision for survivors of domestic abuse DAA 2021 also places a duty on tier one authorities including the Greater London Authority to assess need and provide safe accommodation for survivors and their children. We note that the Domestic Abuse Commissioner role was still very much a new one when the UK went into lockdown in March 2020.

38. Despite the positives in the DAA 2021, we remain concerned about the refusal of the Government to extend its measures to migrant women with insecure immigration status and women with no recourse to public funds – some of the most vulnerable women as their immigration status can be deliberately exploited by perpetrators and their access to support is already limited. We also remain concerned that support for specialist VAWG services in the community are not part of the new duty in the Act – which we believe creates a two tier system where safe accommodation is funded at the expense of community-based services. Community-based organisations support 70% of domestic abuse survivors who use a service (RG/13).<sup>16</sup> This failure during the pandemic to properly support migrant women and specialist community services, and the impact that this had, is outlined in detail below (paras 183-189). We set those concerns in *Violence against women and girls, housing and homelessness: A joined up strategy* (RG/10).<sup>17</sup>

39. Crucially, even though the legislation was debated by Parliament during the pandemic, it was never designed to address the impact of the pandemic on VAWG and the unparalleled number of survivors reaching crisis point and becoming unsafe in their homes during that period. The Act, whilst introducing significant and important changes to the way in which support is provided to survivors of domestic abuse, does not offer any

<sup>16</sup> <https://safelives.org.uk/victims-and-prisoners-bill#:~:text=Community%2Dbased%20organisations%20support%2070,specialist%20services%20cannot%20be%20overstated.>

<sup>17</sup> Solace Women’s Aid, 31 March 2021 -

[https://www.solacewomensaid.org/sites/default/files/solace\\_vawghousing\\_final\\_resup10125-compressed\\_1.pdf](https://www.solacewomensaid.org/sites/default/files/solace_vawghousing_final_resup10125-compressed_1.pdf)

real solutions to the housing crisis facing survivors of VAWG. The combined impact of lockdown on VAWG, combined with the shortcomings in and lack of funding for fast, effective and long lasting housing and social support, risks creating a logjam of need and incentivizing further gatekeeping by local authorities in an already unforgiving housing landscape, harming survivors and increasing costs.

## **Pandemic and lockdown**

### Adverse effects of lockdown on women and girls generally

40. This statement has focused on gender- based violence and harms, but we note that there were a wider range of impacts on women during the pandemic including: increased unemployment and increased number of women with a precarious income, increased financial challenges, increased childcare burden and increased impact on mental health (I will say more about mental health below). Women are more likely to be employed in lower paid jobs and more likely to be carers (of adults and children) (see R 53299, 52646, 54186 and 185078). Many survivors face intersectional discrimination and come from working-class households. The wider impacts on women, and the intersectional discrimination they face, are crucial to take into account when looking at gender based violence as how Covid-19 affects women's economic independence is significantly related to their wider safety and experiences of VAWG.

41. The expert report of Dr Clare Wenham sets out existing structural inequalities experienced for women including lower paid and more precarious employment, and less financial security. More women than men are accommodated in temporary accommodation (RG/14)<sup>18</sup>. It also needs to be recognised that barriers in access to health, housing, insecure employment, poverty, cuts to government support, and greater share of caring responsibilities became much more marked for Black and minoritised women, particularly where racialised socio-economic inequality intersects with gender, race and disability (Crises collide: women and Covid-19: examining gender and other equality issues during the Coronavirus outbreak) (RG/15).<sup>19</sup>

<sup>18</sup> Table TA2 *Number of households in temporary accommodation in England* show, in the first quarter of 2020, that 41% of households in temporary accommodation were female lone parents, and 10% were single females. 19% of households were headed by a couple, and single men (either parents or without children) constituted 19%. Statutory Homeless Live Tables, DLUHC at: [Tables on homelessness – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/tables-on-homelessness). However, women are less likely than men to sleep rough: in the *Rough Sleeping Snapshot in England: autumn 2019* (MHCLG at [Rough sleeping snapshot in England: autumn 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2019)) 83% of rough sleepers were men and 14% were women. From March 2020, the statistics change as a result of the government's *Everyone In* initiative, providing emergency accommodation to all rough sleepers regardless of priority need during the period of the pandemic.

<sup>19</sup> Women's Budget Group 2020 – available here <https://wbg.org.uk/wp-content/uploads/2020/04/FINAL.pdf>

42. Women are also more likely to be employed in sectors which remained open during the pandemic, such as the NHS and social care. They are also more likely to be providing informal care to family members (or other relatives or friends). The burden of increasing care demands on women has increased following cuts to the social care sector as a result of austerity. During the pandemic, where formal care services were reduced, and when schools were closed, women were more likely than men to be providing informal care, home-parenting and child-care.

#### Demand for VAWG support services during the pandemic

43. Demand for VAWG support services fluctuated during the pandemic but overall demand was up and cases were more complex.

#### *Solace advice line*

44. In March 2020, we saw an increase in calls to our advice line of 117% compared with the previous year. We then experienced a second increase towards the end of April into May 2020, when the government started to talk about measures to take the country out of lockdown. There was an increase in calls from 289 in May 2019 to 397 in May 2020, 'really quite a big increase' (Interviewee S04) (RG/3)<sup>20</sup>. Another staff member said 'our advice line has hit the record of calls' in the first week of the 'stay alert' lockdown easing announcement. This announcement was made on Sunday 10th May, and 'that Sunday until the next Sunday we had received so many calls. Probably triple the amount of the calls that it would receive normally in a week' (Interviewee S06). It was clear that, 'lockdown has accelerated abuse', as well as survivors having 'not been able to call for so long' (Interviewee S03).

45. The increase subsequently dropped over the summer months. In July and August we were able to answer around half of calls received when our line was open. From August and during September 2020 we saw a 30% increase in calls, which we interpret as meaning that children returning to schools may have given victims a window of opportunity to seek help. The highest peak in calls to our advice line was in September 2020, after schools

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<sup>20</sup> The interviews referenced are with victims of domestic abuse and frontline workers within our covid-19 emergency accommodation project in research conducted by Solace, Justice Studio and University of Greenwich, published March 2021

had re-opened, and we were only able to answer about 40% of calls received. That peak was 21% higher than calls received in February 2020, and 138% higher than the quietest period during the first lockdown in April.

46. During the last quarter of 2020 (September – December 2020), our advice line saw a 50% increase in demand and our counselling services have seen a 100% increase in referrals. Due to lack of capacity, we had to turn away two referrals out of every seven in December 2020.

47. The official figures offered only a glimpse into the reality of the situation, yet a pattern quickly emerged. One SWA staff member explained that, 'I think we noticed, the week before lockdown we got loads, loads more calls. The calls to the advice line went up massively' (Interviewee S03). However, this contrasted strongly with the situation once lockdown had begun. It was quieter; 'after lockdown started the calls went way down, we were much, much quieter than we normally are.' It was clear that this was 'because women are unable to call if their abuser is at home, that wouldn't be safe. So that was quite scary because it was super quiet' (Interviewee S03).

#### *Solace refuge services*

48. The week before March 2020 lockdown was announced we were receiving around two referrals for every one refuge space but by the time survivors had been locked down for four to five weeks (end April 2020) enquiries spiked, and we were getting around four enquiries for every one refuge space that became available.

49. We opened our 70 bed emergency accommodation project on 12 May 2020 to an overwhelming number of referrals and within a month were nearly at capacity. It had 20 spaces for women with no recourse to public funds and these beds were full within a week.

50. By December 2020, we were turning away about 40% of refuge referrals (and third of those decisions were due to lack of capacity).

#### *Keeping refuges, workers & residents safe*



51. On 23 March 2020 the Government published guidance for refuges during the pandemic (*Covid19: guidance on isolation for domestic abuse safe-accommodation settings*)<sup>21</sup> (INQ000176557). This was welcome, given the close proximity of living conditions in refuges. It is normal for families to live in one room and for three families to share a bathroom and kitchen. However, this guidance published early in the pandemic was not updated throughout the period in question. By comparison, the guidance for commissioners and providers of hostel services for people experiencing homelessness and rough sleeping was updated at much more regular intervals. This points to a lack of adequate consideration of this group living in overcrowded and cramped conditions.
52. There was also a lack of clarity about whether refuge workers were able to gain access to test and trace equipment, PPE and early vaccination, despite working in close proximity and playing a social care role. Initially domestic abuse providers had to enquire with individual local authorities or health authorities to get clarity on whether they were eligible for testing and vaccinations in line with health and social care staff. We felt we had to approach local public health bodies and local authorities to try and get access to PPE and tests as we felt this would be more fruitful than lobbying at a national level. However, even when requests for support from local authorities were accepted, we were rarely provided with sufficient materials. At one point one of our refuges made a request for PPE support to the local authority commissioning the service, and was sent a single mask for the whole service.
53. When lateral flow testing (LFT) became available SWA again had to approach individual public health departments to access them for their staff. Some local authorities supported access to LFTs where as others were not allowing refuge and outreach workers access to these services. There was a lack of clear instruction from the UK Government on access to tests which led to an inconsistent approach across SWA's London services which is likely to be replicated in other parts of the country. Whether domestic abuse workers were eligible for vaccines was also unclear. Vaccination status was eventually clarified by NHS England in a letter to homelessness services on 2 February 2021, following advocacy from organisations at a national and local level (RG/16).<sup>22</sup>

### *Moving on from refuges*

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<sup>21</sup> MHCLG & PHE, March 2020 at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/874568/COVID-19 - guidance on isolation for domestic abuse safe-accommodation settings.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874568/COVID-19_-_guidance_on_isolation_for_domestic_abuse_safe-accommodation_settings.pdf)

<sup>22</sup> <https://thamesreach.org.uk/pandemic-protect-lives/>

54. Access to refuges was limited as demand went up but also it was more challenging for women to move on from refuge accommodation into accommodation secured by a local authority due to closing of statutory services. This was partly alleviated by projects such as SWA and SBS' emergency accommodation (see para 12) as well as smaller specialist projects run in London but there were still challenges in accessing services and we were still turning away referrals (RG/17).<sup>23</sup> We were able to accommodate just 40% of referrals to our refuge services in December 2020, turning one third away due to lack of capacity (rather than suitability). This was particularly acute for women no recourse to public funds – in our emergency accommodation project at least a third of spaces were reserved for this group but 25% of referrals that were turned down were due to a lack of NRPF spaces.

55. Other services shared a similar experiences of increased demand including:

- i. Birmingham and Solihull Women's Aid quoted that demand rose by 29%, but some days up to 120%.
- ii. Imkaan (an umbrella UK wide organization who do not provide domestic abuse services directly but represent organisations providing services for black and minoritized women subject to domestic abuse) found that 75% of Black and minoritised women who fled domestic violence were unable to obtain accommodation in by *and for* refuges because refuges were full. *By and for* organisations experienced up to a 300% increase (RG/18)<sup>24</sup> in referrals for resettlement support, housing and refuge provision, counselling and therapeutic support and legal advice and individual advocacy to social services, housing and other statutory services (May 2020) (RG/6) (RG/18).<sup>2526</sup>

*Increase in complexity of cases*

<sup>23</sup> <https://www.solacewomensaid.org/about-us/news/solace-southall-black-sisters-launch-covid-19-crisis-project-create-urgently-needed>

<sup>24</sup> <https://bristoluniversitypressdigital.com/view/journals/jgbv/6/2/article-p315.xml>

<sup>25</sup> [Imkaan's Position Paper Outlines the #DualPandemics — Imkaan](#) (May 2020)

<sup>26</sup> *The disparity is evidence: Covid-19, violence against women and support for black and minoritized survivors*, Thiara & Roy, Journal of Gender-Based Violence, Vol 6, Issue 2 at ['The disparity is evident': COVID-19, violence against women and support for Black and minoritised survivors in: Journal of Gender-Based Violence Volume 6 Issue 2 \(2022\) \(bristoluniversitypressdigital.com\)](#)

56. In addition to the dramatic increase in the number of referrals to our service when the Covid-19 pandemic struck, the complexity of those cases also increased, including a significant impact on mental health. Survivors were often in greater distress with more complex needs, including increases in suicidal ideation. Academic research has made links between domestic abuse, particularly coercive and controlling behaviour, and impacts on mental health including risk of PTSD, depression and suicidal ideation (RG/19).<sup>27</sup> The pandemic is known to have negatively affected mental health and those experiencing gender based violence are likely to have experienced heightened abuse during this period. This was seen during the pandemic within SWA's services and organisations we partner with, women were contacting services in greater distress and with higher needs, including an increase in suicidal ideation. Someone who may have called their caseworker on a weekly basis was calling daily for support. This put greater strain on our staff and our service capacity, and the advice line was unable to support as many women despite an increase in demand.
57. The need for mental health and therapeutic support was highlighted by referrals to SWA's counselling services, which saw a 100% increase in referrals, and that we had to turn two referrals out of seven away in December 2020 because of lack of capacity. Several partners had to close their waiting lists highlighting a significant backlog in people needing support. One of our partners reported that the usual waiting time for counselling is 8-12 weeks, but the waiting time increased to 20 weeks since the beginning of the Covid-19 pandemic.
58. Furthermore from the analysis of the documents disclosed in this Inquiry it is clear to me that the effect on women's and children's mental health because of the trauma experienced from domestic abuse was not properly considered by government. Whilst there are hundreds (if not thousands) of documents relating to mental health, the Government's awareness of it and the Government's concern, there was no proper understanding of the interplay between abuse and mental health nor was there any attempt to adopt a multi-disciplinary approach to it. Mental health was squarely considered an NHS matter, whilst domestic abuse fell within the remit of the Home Office and Ministry of Justice. I see little evidence that there was any 'joined up thinking' in the response to the assistance or messaging given to women. This is despite the evidence showing that the lockdowns, and the isolation caused by them, are likely to have a disproportionate effect on women and further exacerbated by being a victim of domestic abuse (see for

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<sup>27</sup> <https://journals.sagepub.com/doi/10.1177/15248380231162972#bibr134-15248380231162972>



example INQ000050954, INQ000185074, INQ000091069, INQ00086652 and INQ000050954).

### An increase in the frequency and intensity of gender based violence

59. The increased demand on our services is no surprise given the increase in frequency and intensity of gender based violence during the pandemic, and in particular following the first national lockdown in March 2020. The restrictions used to contain the spread of Covid-19 did not cause domestic abuse, but they did create the conditions for it to spiral. The increase in the scale and extent of domestic abuse and violence against women during the first lockdown was widely reported.
60. Data from a range of sources has highlighted the increased gender based violence (RG/20).<sup>28</sup> Between April and June 2020, the National Domestic Abuse Helpline logged a total of 40,397 calls and contacts on its database, a 65% increase compared with the first three months of 2020. Victim Support reported that, in May 2021, the number of referrals received for victims of domestic abuse was 25% above, and rape was 23% above volumes of the same referrals received in early 2020 (RG/21).<sup>29</sup>
61. An increase in gender based violence was not a unique phenomenon to this pandemic, in fact many studies have found that gender based violence increases during pandemic and major disasters (RG/22) (RG/23).<sup>30</sup>
62. The decision to introduce NPIs, particularly lockdown and closing schools, put women and children at a heightened risk of gender based violence and they were mandated to stay in their home for extended periods with the perpetrator of the abuse. In normal circumstances, employment, socialising and everyday activities give some survivors the ability to spend time away from their perpetrator, and opportunities to reach safety or support services.

<sup>28</sup> [Charges and cautions for domestic violence rise by 24% in London | Domestic violence | The Guardian](#), 24 April 2020.

<sup>29</sup> Both from the Home Office's VAWG strategy:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1033934/Tackling\\_Violence\\_Against\\_Women\\_and\\_Girls\\_Strategy\\_-\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033934/Tackling_Violence_Against_Women_and_Girls_Strategy_-_July_2021.pdf)

<sup>30</sup> See i Harville, Taylor, Tesfai, Xiong & Buekens (2011) "Experience of Hurricane Katrina and Intimate Partner Violence" J Interpers Violence. 2011 March; 26(4): 833–845 and Viero, Giussy Montisci, Kustermann & Cattaneo (2021) *Violence against Women in the Covid-19 Pandemic: A review of the literature and a call for shared strategies to tackle health and social emergencies*



63. Increased working from home exacerbated the conditions for abuse with women and children spending more time alone with their perpetrators leading to more abuse. Economic abuse charity, Surviving Economic Abuse found that 38% of women survivors of domestic abuse who were living with the perpetrator were working from home when they previously had not, which thereby increased their risk of being abused (RG/24).<sup>31</sup>
64. Increased isolation from social networks including colleagues, friends and family gives the conditions for further abuse as perpetrators will believe they are less likely to be detected or face consequences. It also gave women fewer opportunities to seek relief from the abuse (impacting their mental health) and fewer opportunities to seek help and support.
65. Similarly with public resources being diverted, particularly the police and children's social care, or felt to be less visible or contactable, and with schools closed, perpetrators will believe there are fewer consequences to their actions and this can empower them leading to increased abusive behaviour.
66. Covid-19 also gave significant opportunities for perpetrators to undertake post-separation abuse through child contact during the pandemic. Survivors in SWA services and others across the UK highlighted that abusers were keeping children after contact or not permitting contact for false reasons including alleged symptoms that were never confirmed and that appeared and disappeared as it suited the abuser to be able to keep the children.
67. Remote contact with children also gave a tool for perpetrators to intrude into survivors lives through having to admit abusers back in their home, even if only virtually.

#### *Personal accounts*

68. Our account of the increase in demand for our services, and the data showing an increase in domestic abuse, are more personally demonstrated by the accounts of users of SWA's services.

#### *How the pandemic increased risk of abuse*

69. Below is a case study from one of our Independent Domestic Violence Advocates.

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<sup>31</sup> The Cost of Covid-19: Economic abuse and the pandemic available here, <https://survivingeconomicabuse.org/what-we-do/research-and-evidence/the-cost-of-covid-19/>

*'February brought physical assault against R by the perpetrator pushing her down on the bed and pouring liquid into her eyes. R reported it to the police. The perpetrator was cautioned. R was feeling stronger and more confident. March brought Covid-19 and lockdown. R was doing her placement as a keyworker and was busy. She found it difficult to stay in regular contact with me. I assured her it was understandable, her case would remain open and she could always reach out to me. April I received another referral for R from A&E she attended after assault by the perpetrator. When I got in touch with her, R said she did not let me know about the incident because she moved in with the perpetrator. Her family member was a vulnerable adult and needed to shield. She was in a placement and was worried about infecting family members. R said the abusive behaviour has increased and she was feeling trapped. We discussed emergency accommodation options. I made a referral to MARAC (Domestic Abuse Multi-Agency Risk Assessment Conference) due to high risk and communicated with her student accommodation office/safeguarding lead at her university to find her a safe place as soon as possible. The place was available in student halls. R left perpetrator's flat when he went to the shops and cut all contact. The perpetrator was not deterred. He continued to try and contact her, then made fake social media profiles to harass R and spread lies about her to her friends and work colleagues. I advised R around recording evidence and reporting it to the police. After the report was made the perpetrator was arrested and bail conditions put in place.'*

#### *Police support*

70. During March 2020 and November 2020, SWA undertook research with Justice Studio on the impact of the pandemic on the experience of domestic abuse survivors (RG/3).<sup>32</sup> Below I outline some of the responses we got from interviews with victims of domestic abuse in our emergency accommodation project and some interviews of frontline workers:

*'My husband put me out in the beginning of April, and I – I remember, I saw in the news, in the beginning of April, that domestic abuse increased 100 percent more because of the pandemic. And I started crying because I never ever in my life thought I was one of them...You were completely vulnerable. You feel*

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<sup>32</sup> "When I needed you to protect me, you gave him more power instead": Covid-19 Lockdown & Domestic Abuse, SWA & Justice Studio, March 2021.

*like, wow, nothing's open for you, and you are completely unprotected, you know'.<sup>33</sup>*

71. On an experience with the police:

*'I got really scared and called the police,' recounted a Black survivor. She explained that the person on the other end of the line, said, "just stay in there for as long as it is safe. If it's not safe you can go" (Interviewee H02). She took his advice, and decided to leave the flat, encountering the police arriving as she got to the entrance to her building. She explained that she had started to cry but the police ignored her. Bringing her back to her apartment they proceeded to side with her perpetrator. She said, 'what the police said that day that made me feel like: this is one set of people of the Government, of the system, that I feel should have my back. Well, if they are treating me like this, then where do I stand? They told him that day that he has a right to lock me out of the flat' (Interviewee H02). Not only siding with the perpetrator against the survivor, the police focused their energy on allowing the perpetrator to stay in the flat, expecting the survivor and her children leave. The police said to the survivor, 'that I need to go and find somewhere to stay that evening. And I was like, "who will take me, with three children, in the middle of this? Everyone is scared. Besides, I haven't got anyone"' (Interviewee H02).*

*'The police made me ring her that day. I rung her for like three, four times in front of the police. She did not answer. So, they said they were going to drive me to her house. But I said, "My children are in there, I don't want to leave without my children... I would rather go back in there and the worst that would happen is him killing me. I would rather do that than walk away from my children. If I walk away from here now, I don't know what happen to even to myself, 'cos this is my whole life about to crash in front of me. I have endured about twelve, fifteen years of abuse because of these children and you are making me leave without them." So, they told me that if I go back there and he's locked the door from inside, because there's a catcher, that if I break that door, if he calls the police on me, that they will arrest me. Like, they do that. I kept telling them, "I must have some rights to that house. I have lived there, too." They said, "He has a right to lock you out" (Interviewee H02).*

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<sup>33</sup> *Ibid*

The changes to statutory services as a result of NPI's: identifying survivors of domestic abuse and accessing help

72. The changes to statutory and public services as a result of NPI's meant that it was harder for women seeking support with domestic abuse to contact public services. It also meant that women were less likely to be identified by public support as potentially needing support with domestic abuse. Public services were being delivered over the telephone or online, so that women were not in a private space. The requirements of social distancing, stay at home orders and the need to divert resources led to a significant change in the ability for statutory and public services to support domestic abuse survivors.
73. It's important to explain that women and girls access support services in different ways for different reasons. Sometimes, women are unlikely to trust the police, social services or other agencies. Another barrier might be where a perpetrator accompanies the victim to all appointments, sometimes even GP or other health appointments, and so the victim is unable to seek help for the abuse. Given those barriers, the more that public services are physically accessible, and available on a private face-to-face basis, the more likely it is that a woman will be able to seek support for domestic abuse confidentially, in a safe environment.
74. Significantly, even when survivors did seek help, the risk of transmission and lockdown restrictions exacerbated existing challenges survivors had with accessing key services at all and, when they did, those services were barely available. The Women's Resource Centre found that demand for VAWG services and the increased complexity of cases when reaching them was being driven by the failure of statutory service provision during the pandemic. 45% of women's organisations that they surveyed said the statutory response had become a lot worse (RG/25).<sup>34</sup>
75. The closure of face-to-face services or overload of other services such as health removed the window of opportunity that survivors have to seek help or safety. In order to comply with social distancing requirements, many statutory services rapidly moved online and vastly reduced or completely removed in-person appointments and face to face support. Whilst of course technology became an essential way for people to access the 'outside world', for many survivors of domestic abuse it was simply not available or positively

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<sup>34</sup> *Covid crisis and the UK women's sector: one year on* (Women's Resource Centre, April 2021): <https://www.wrc.org.uk/Handlers/Download.ashx?IDMF=8683fd98-b697-47dc-b387-14ad6e777338>



harmful – particularly when it could only be used under the watchful eye of their perpetrators with whom they were trapped.

76. Services going online did not factor in that many survivors had challenges in applying for support including housing applications and benefits online because they do not have access to either the necessary devices or the digital skills or both.

77. The move to majority online or telephone appointments of primary healthcare also impacted survivors' ability to access health services in privacy, limited the opportunities for disclosure and limited the opportunities for healthcare professionals to notice signs of abuse and violence. We know that older survivors in particular are more likely to make disclosures to GPs than other referral routes, and are more likely to experience digital exclusion. GPs and health services more broadly can be opportunities where women can access services unaccompanied or one of the few places women may engage with statutory services. This means that they can be a space for survivors to disclose domestic abuse for those women who have few other avenues to do so. There are also extensive programmes to support GPs in identification of domestic abuse cases and to make referrals to specialist DA services (RG/26).<sup>35</sup> Research previously showed women are more than three times as likely to talk to someone in a healthcare setting as ever to go to the police (RG/27).<sup>36</sup> In 2022 research by the Domestic Abuse Commissioner's Office it was found that 44% of women first reported their abuse to a health care setting which is the highest, compared to 17% telling the police first (RG/28).<sup>37</sup>

78. A lack of understanding by housing departments has always been a challenge for domestic abuse survivors but the move to remote and online services (rather than face to face appointments) made matters particularly difficult. I have already referred to the practice of "gatekeeping" that, even prior to the pandemic, was particularly prevalent when women were homeless due to domestic abuse (see paras 32-35). We found that survivors found it difficult to get hold of housing officers over the phone and that communication by telephone or virtual means meant that it was more likely that an account of domestic abuse might be treated with disbelief, and that accommodation would not necessarily be provided. Staff also found that when service users approach housing authorities without an advocate they

<sup>35</sup> <https://irisi.org/about-the-iris-programme/>

<sup>36</sup> End Violence Against Women Coalition, Rapidly Compiled – Initial Briefing on the COVID-19 Pandemic and the Duty to Prevent Violence Against Women & Girls, April 2020

<sup>37</sup> Domestic Abuse Commissioner's Office, A Patchwork of Provision: policy report, 2022  
[https://domesticabusecommissioner.uk/wp-content/uploads/2022/11/DAC\\_Mapping-Abuse-Suivivors\\_Long-Policy-Report\\_Nov2022\\_FA.pdf](https://domesticabusecommissioner.uk/wp-content/uploads/2022/11/DAC_Mapping-Abuse-Suivivors_Long-Policy-Report_Nov2022_FA.pdf)

are more likely to be recorded by housing staff as having made '*housing enquiries*' rather than treated as making a '*homelessness application*', and more likely to be turned away.

79. Gatekeeping practices in housing offices when domestic abuse survivors approach the local authority for support, has always been a systemic issue across the country. In spite of the increased awareness of domestic abuse during the first lockdown and the measures taken by the government to support survivors as well as the emphasis on housing homeless people through 'Everyone In', negative experiences of women and their advocates with housing officers have been exacerbated by lockdown in many local areas rather than ameliorated by it.
80. Overall, there were varying experiences with local authority housing departments during the pandemic. There was often push back from local authorities in providing temporary accommodation and increased gatekeeping. This was particularly acute for women with no recourse to public funds who have much more limited options for accommodation. More women were being told to return to perpetrators by housing officers. Perpetrators were being called by housing officers, and there was an increased reliance on police evidence in order to show that they were suffering abuse.
81. In many boroughs there were good intentions but limited capacity and staff not being given appropriate advice on the changes in eligibility criteria in presenting as homeless. There were also just basic challenges of trying to get hold of services as they had closed their offices – services noted that they could often only get through via email, and not even by phone. SWA and organisations we partnered with regularly found that housing officers were not answering calls and there were problems escalating cases, as well as local authorities failing to fulfil their statutory duties to women who are homeless as a result of abuse. VAWG organisations were having to involve housing solicitors or make formal complaints in a number of cases (a greater number of cases than prior to lockdown)
82. Whilst MOPAC issued a letter to London local authorities noting their duties (RG/29), local authority housing provision and response was not been consistently improved by this. We often found that during the early months, statutory services have high expectations of VAWG organisations and were using this to avoid fulfilling their duties.
83. Particular challenges with housing services from local authorities included:

- Women who had experienced gendered violence being required to stay in mixed hostels/hotels.
  - Local authorities refusing to provide temporary accommodation over the weekend despite the woman being local to the borough and having no other options during the pandemic.
  - Women being told they could not get access to temporary accommodation because their case was not 'life threatening enough'.
  - Women being asked on numerous occasions to provide evidence which had already been submitted to housing.
84. Whilst some of these challenges were not new when trying to access housing for domestic abuse victims, these pre-existing barriers felt exacerbated during initial Covid-19 lockdown restrictions.
85. Alongside this reduction in support or delays from local authority housing departments, our London advice line was seeing an increase in women presenting with acute homelessness support needs, with a quarter of women calling requiring support around homelessness. On week the lockdown easing began (10<sup>th</sup> May), we saw a significant increase in emergency accommodation calls or people declaring homelessness.
86. These challenges with housing had a knock on effect for the amount of refuge spaces that were available at a time where demand was high. A lack of move on options from refuge meant women stayed longer in refuges and those leaving during the lockdowns could not secure spaces.
87. From our 70 bed emergency accommodation project, we found challenges around finding permanent move-on accommodation for those using the emergency accommodation provision.
88. Caseworkers within the project reported that local authorities would leave it as long as possible to provide housing options for women, often not providing anything until the day they have to leave the emergency accommodation, meaning advocates had to spend significant time trying to liaise with housing departments and causing undue stress for women and their children. This was happened disproportionately to women with no recourse to public funds where there was often a lack of understanding of what support they could get and challenging the need to support women with no recourse who had children.

89. This transition to digital provision led to the exclusion of certain women in particular, women from low income backgrounds, elderly women and women who have support needs to access technology including language barriers.<sup>38</sup>
90. Migrant women who are already reluctant to report to the police or health services due to concerns of reports to immigration or that they will be disbelieved had further obstacles in accessing statutory services, leaving them with even fewer options.
91. Access to services was also hampered by the depleted numbers of translators and intermediaries due to Covid. Pre the pandemic, it had already been hard to arrange for translators, in general, and particularly female translator. The shortage during the pandemic made this vital means of accessing support for women with English as a second language and deaf women even more difficult.
92. Ending Violence Against Women (EVAW) coalition noted that there have been issues around British Sign Language interpreters as often no one is available at short notice so survivors have been told to come back another day to report a crime or to arrange their own interpreter (RG/30).<sup>39</sup>
93. The closure of schools and the safety net they provide for children, and their mothers was also a concern. It is unclear what collaborative efforts there were between the Department of Education, Department of Health and Social Care and the Home Office, to ensure that those children suffering domestic abuse would be identifiable, supported and protected in the event of school closures and restrictions. With the restrictions of in person visits to GP surgeries and hospital appointments and peoples reluctance to approach health services during this time, schools became an important source during the pandemic for identifying those children who were suffering domestic abuse in the home, and a vital access point for those children. Women would also have been able to get help from teachers when

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<sup>38</sup> See expert report to this Inquiry *Ethnicity, Inequality and Structural Racism* (Nazroo and Becares) and *Inequality, Later Life and Ageism* (Nazroo) on digital exclusion.

<sup>39</sup> *Access to Justice for Women & Girls during Covid-19 Pandemic*, End Violence Against Women and Girls Coalition, Imkaan, Rape Crisis of England and Wales, Centre for Women's Justice and Rights of Women, August 2020 - <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/Access-to-Justice-for-Women-Girls-during-Covid-19-Pandemic.pdf>



collecting children from school, or used this as a window of opportunity to call domestic abuse services.

94. The rise of children witnessing domestic abuse, and not having the school system to identify them and to support them if schools were to shut, was well known to the Government and was set out in a paper from the Department of Education on 15 March 2020 (relativity 106221). Whilst there was some reference in Government Guidance on the closure of schools to children becoming vulnerable by virtue of the pandemic and lockdown, ‘vulnerability’ was defined in the context of those who were ‘clinically vulnerable’ or those who were vulnerable because of a statutory duty (such as a ECHP or an allocated social worker) - see for example relativity 75681, 53007, 53101, 75722, 115251. In May 2020, the Government’s *Equality Impact Assessment: childcare, school and other educational settings* gave no guidance as to who was ‘vulnerable’ other than those who would already be considered so by the school/local government (relativity 75429). It was not clear whether due regard would be had to those children who were suffering domestic abuse but where there was no prior concern or allocated social worker and whether they would fit into that definition. It does not appear that there was any clear guidance or direction for schools in respect of domestic abuse, especially those who were not already considered to have ‘safeguarding and welfare needs’ – as highlighted by Yvette Cooper MP in Parliament on 28 April 2020<sup>40</sup>. This is particularly concerning given that only a small minority of vulnerable children attended school in the early stages of the pandemic (see relativity 75592).

95. The decision to shut schools was considered as early as February 2020, yet there was no ‘joined up thinking’ with other departments at this preparatory stage as to what wider implications this might have and there is no evidence that the impact on women and girls, and domestic abuse, was considered when Gavin Williamson announced school closures on 18 March 2020 (see Relativity 75716). Whilst there was government guidance on pupils at risk going to school, the lack of interaction with schools, and a reduced ability to safeguard still led to more isolation for women and children experiencing abuse. Towards the end of the pandemic, we noticed a widening of the definition of which child was ‘vulnerable’ for the purposes of being allowed to attend school in person.

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<sup>40</sup> [Domestic Abuse Bill - Hansard - UK Parliament. Ms Cooper said](#) “the social worker is not dropping by, the bruises will not be visible at the school gate the next morning; and the GP will not be asking questions at the next appointment.”.

96. It was welcome that police forces and the Home Office took steps to communicate that police would prioritise domestic abuse call outs and make arrests during this period as this went some way to address perpetrators' sense of impunity and having no onlookers or sanction. Data demonstrates there was an increase in the number of domestic abuse offences recorded by the police in March to June 2020, with a 7% increase compared to 2019, and an 18% increase compared to 2018. In April to June 2020, approximately 1 in 5 of all offences recorded by the police were flagged as domestic abuse (RG/31).<sup>41</sup>

97. However, survivors had mixed responses from the police during the pandemic with some positive experiences whilst others had more challenging experiences, particularly around survivors having their experiences minimised or the police allowing the abuser to remain in the home, escalating abuse rather than containing it.

98. Some of the challenges survivors faced included:

- A survivor told Surviving Economic Abuse that the police had failed to arrest the perpetrator after he assaulted her and that services were delayed by the outbreak.
- A professional told Surviving Economic Abuse that the "*police had arrested and fined [client] for breaking lockdown restrictions when she tried to leave because he made threats to kill but didn't actually hit her (not domestic "violence")*" (RG/24).<sup>42</sup>
- One victim-survivor reported that, after her ex-partner had reported her to the police falsely accusing her of breaking lockdown restrictions, as well as sharing information on the town of her home and workplace on social media. She had an initially poor experience with the police, who failed to see this within the context of coercive control:
- Similarly, another victim-survivor who had called the police after the perpetrator assaulted her during the pandemic told SEA that she too had mixed experiences, in that the officers who attended had been supportive, but the detective leading the case was not as they asked for interviews on the same day and appeared to be discouraging pursuing the case.

99. It also needs to be recognised that there is a lack of trust in the police to help domestic abuse survivors. This is particularly acute for Black and minoritised women who have concerns about being disbelieved or that they will face discrimination when reporting. Imkaan, a body representing 'by and for' VAWG organisations for Black and minoritised

<sup>41</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/domesticabuseduringthecoronaviruscovid19pandemicenglandandwales/november2020>

<sup>42</sup> The Cost of Covid-19: Economic abuse and the pandemic, Surviving Economic Abuse, January 2021

women said that some of their members also reported poor quality risk assessments undertaken by police with VAWG issues being re-classifying and therefore deprioritising VAWG as 'family issues' and suggesting women stay with extended family members.

100. As noted in para 21, migrant women are already less likely to approach the police for fear of immigration enforcement.

101. The impact of Covid-19 and associated restrictions cannot be overstated in relation to the scale of abuse and violence victim survivors have been subjected to; the halt in the safety mechanism available; the ways in which they were able to access support (or not); how survivors were identified by others as vulnerable; the impact it has had on survivors' mental health and the long-term impacts it will continue to have as a result of the trauma experienced under lockdowns. The economic downturn and job losses caused by the pandemic also created the conditions association with an increase in VAWG.

102. In short, the VAWG sector has been seeking to tackle and address and deal with a dual pandemic; the VAWG pandemic declared by the World Health Organization in 2013, as well as the Covid-19 Pandemic.

### **Government awareness of likelihood of increase in domestic abuse as a result of lockdown**

#### Prior to decision to lockdown on 23 March 2020

103. It was clear to the Government, from very early on, that domestic abuse rates were likely to rise, and significantly so, if there was a lockdown. Information was publicly available and I am now aware, having seen documents disclosed to the Inquiry, of the Government's internal discussions.

#### Publicly available information

104. There were contemporaneous reports of a rise in domestic abuse as lockdown began in various countries:

- i. Bethany Allen-Ebrahimian "China's Domestic Violence Epidemic" Axios, 7 March 2020; (RG/32)<sup>43</sup>
  - ii. Melissa Godin "As Cities Around the World go on Lockdown, Victims of Domestic Violence Look for a Way Out", *Time*, 18 March 2020. (RG/33)<sup>44</sup>
  - iii. Jhumka Gupta "What does coronavirus mean for violence against women?" Women's Media Centre, 19 March 2020 (RG/34)<sup>45</sup>
  - iv. The Guardian 26 March 2020 "Warning over rise in UK domestic abuse cases linked to coronavirus" (RG/35)<sup>46</sup>
  - v. The Guardian 28 March 2020 "Lockdowns around the world bring rise in domestic violence" (RG/36)<sup>47</sup>
105. On 19 March 2020 the Women's Budget Group published *Covid-19: Gender and other Equalities Issues* (RG/37).<sup>48</sup> The report stated "There are serious concerns that self-isolation will increase levels of violence and abuse against women" and referred to the financial risks for the VAWG services sector. It called for the government to set up a UK-wide emergency fund to support voluntary organisations providing essential front-line services.
106. I also note that the Mayor of Greater Manchester, Andy Burnham, seems to have noted on 22 March 2020 that the government guidance on shielding those identified as most clinically vulnerable did not contain any reference to domestic abuse, with no guidance as to how those people would be able to flee their homes if they needed to (INQ000216991\_0014).
107. It also seems that the police were aware of the reports from China and Italy and were concerned that there would be a rise in domestic abuse incidents, and that those incidents would not be reported to the police (Hewitt, INQ000216925\_0026 and INQ000052974, 6 April 2020).

<sup>43</sup> <https://www.axios.com/2020/03/07/china-domestic-violence-coronavirus-quarantine>

<sup>44</sup> <https://time.com/5803887/coronavirus-domestic-violence-victims/>

<sup>45</sup> <https://womensmediacenter.com/news-features/what-does-coronavirus-mean-for-violence-against-women>

<sup>46</sup> <https://www.theguardian.com/society/2020/mar/26/warning-over-rise-in-uk-domestic-abuse-cases-linked-to-coronavirus>

<sup>47</sup> <https://www.theguardian.com/society/2020/mar/28/lockdowns-world-rise-domestic-violence>

<sup>48</sup> Women's Budget Group, 19 March 2020 <https://wbg.org.uk/wp-content/uploads/2020/03/FINAL-Covid-19-briefing.pdf>



108. On 24 March 2020, during the Lords' debate on the then Coronavirus Bill, Baroness Grey-Thompson raised the issue of domestic abuse and said what will be done to look after or support victims of domestic violence, who we know will be at greater risk?"<sup>49</sup>

Government's consideration of the rise of domestic abuse

109. I refer here to documents disclosed by government to the Inquiry.
110. On 18 March 2020 (INQ000052640) issues around domestic abuse were specifically highlighted in the Briefing (v.2) Operations & Policy Command re Cabinet Committee on Public Resilience to the Home Secretary, but those issues were particularly around the safety in refuges, and did not discuss a rise in domestic abuse.
111. On 19 March 2020, the Domestic Abuse Commissioner wrote to the Chancellor of the Exchequer and the Victims' Commissioner wrote to the Prime Minister (referred to as INQ000052784)
112. On the 6<sup>th</sup> April 2020 at a meeting convened by the Home Affairs Committee, the Police reported that they are aware and are preparing for an increase in domestic abuse incidents. This is anticipated given research from China and Italy (INQ000052974).
113. On 16 April 2020 SAGE or one of its subgroups discussed the report: The role of children in transmission (INQ000074924). That report referred to Domestic Abuse rates tripling in China and similarly in Italy (with a focus on the impact on children and an increase in domestic abuse during lockdown (para 57))<sup>50</sup>. See also paragraph 156 below where I address this further.

*Home Office awareness*

114. I have seen the Home Office disclosure. Despite the Home Secretary receiving daily briefings on Covid-19, and there being a daily Situation Report and Dashboard, there are very few documents referring to domestic abuse:

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<sup>49</sup> [Coronavirus Bill - Hansard - UK Parliament](#)

<sup>50</sup> The increase in domestic abuse is also mentioned in evidence by the police as early as 6 April 2020 (see relativity 52974).

115. 17 March 2020 (INQ000052595): Briefing from CV Operations and Police Gold Command to Home Secretary for Cabinet Committee on Public Resilience, which states "The Gov has issued guidance in relation to those in supported living provision, which includes advice on safety, cleaning & isolation. Refuge providers are engaged in their own contingency planning in relation to acc & associated support services in lines with PHE advice. " I comment that there is no discussion of any anticipated rise in domestic abuse as a result of lockdown;
116. 18 March 2020 (INQ000052640): Briefing from CV Operations and Police Gold Command to Home Secretary for Cabinet Committee on Public Resilience contains the same information;
117. 23 March 2020 (INQ000052743): Briefing from CV Operations and Police Gold Command to Home Secretary for Cabinet Committee on Public Resilience contains "There continues to be concern about those having to self isolate with abusive family members & concern for children who are not now at school. Work continues with the provider sector & the police to ensure that avenues of help & support continue to be available & that anyone in imminent danger may continue to rely on a 999 response". I note that this, on the day that the Prime Minister announced lockdown, is the first reference to a possible rise in domestic abuse. We would emphasise that the police should not be the sole focus or only recommendation when reporting domestic abuse, and the National Helpline should also be mentioned.
118. 24 March 2020 (INQ000052744), Briefing from CV Gold Command to Home Secretary for Cabinet Committee on Public Resilience contains three paragraphs on domestic abuse, including reference to £1.6 billion funding being made available to the vulnerable, including homeless. I would comment that the £1.6 billion funding was made available to local authorities to cover all the additional costs of lockdown, and, at that point, no part of it was ringfenced for domestic abuse services;
119. 25 March 2020 (INQ000052778): Home Office Covid 19 Situation Report & Dashboard #75 contains reference to the National Police Co-ordination Centre (NPoCC) having received high volumes of reporting re domestic and child abuse, related to the stay at home advice, and that domestic arguments had increased including between separated parents. Home Office External Affairs had had a team meeting with various domestic abuse charities.

120. 26 March 2020 (INQ000052789): Briefing from CV Gold Command to Home Secretary for Cabinet Committee on Public Resilience refers to a “concern” about those having to self-isolate with abusive family members and concern for children who were not at school. It was said that the Domestic Abuse Helpline continued to be available and the police were confident critical services could be maintained. Whilst it was a positive step that these services were working, it was (and still is) unclear what they were actually doing to get the message about these possible avenues out there.
121. It seems that the Home Office began to acknowledge the rise in domestic abuse around 26 March 2020. A memo was sent to the Home Secretary (Priti Patel MP) and the Minister for Safeguarding (Victoria Atkins MP) headed “update on violence against women and girls and Covid-19” (INQ000052784). It appears to have been prompted by the letters from the Domestic Abuse Commissioner and the Victims Commissioner, the Home Office having been asked to reply to those letters. The memo advised that there was little evidence of any increase in incidence although anecdotally there had been more use of on-line resources and some helplines had reported more complex calls, but that the situation could change quickly. The Ministers were asked to agree to double the funding to Home Office domestic abuse helplines, to hold a ministerial virtual roundtable to reassure stakeholders that government is taking the issue seriously and that the government should undertake a coordinated press campaign to highlight domestic abuse and where victims or perpetrators could go to help.
122. Following this, the Home Secretary wrote an article for the Mail on Sunday on 28 March 2020 (RG/38).<sup>51</sup> She said “*I am acutely aware that the necessary guidelines about social distancing and self-isolation may leave the victims of hidden crime, such as domestic abuse and child sexual abuse, feeling especially isolated, vulnerable and exposed.*”
123. The Home Office also launched its #Youarenotalone campaign on 11 April 2020. This took the form of the Home Secretary conducting the government’s daily briefing on that day (RG/39).<sup>52</sup> She announced £2 million funding for online support services and helplines. The VAWG sector was also encouraged to bid for part of the £750 million funding that the Chancellor had made available to charities. The Home Secretary also tweeted: “*Today I say to victims of DA - help is still available. The National DA Helplines staff 24 hrs number.*”

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<sup>51</sup> [Priti Patel admits 'home is not the safe haven it should be' as abuse rises amid Covid-19 crisis | Daily Mail Online](#)

<sup>52</sup> [Home Secretary's statement on domestic abuse and coronavirus \(COVID-19\): 11 April 2020 - GOV.UK \(www.gov.uk\)](#)

*Together let's demonstrate just how much this country cares. #YouAreNotAlone, #NoExcuseForAbuse".*

124. The Home Office's preparedness for the pandemic was scrutinised in April 2020 by the House of Commons Home Affairs Committee. Its report *Home Office preparedness for Covid-19 (Coronavirus): domestic abuse and risks of harm within the home*<sup>53</sup> was published on 27 April 2020 (INQ000075363). It began with "the stay at home guidance issued by the government on 23 March was necessary to protect the NHS and save lives by flattening the curve of coronavirus infection. But for some people home is not a safe place to be." It noted the increase in domestic abuse both globally and in the UK and calculations that there were at least 16 domestic abuse killings of women and children between 23 March and 11 April. The government's public information campaign was welcomed. The Committee recommended a full action plan to cover support services, housing and criminal justice, and that support services for domestic abuse and vulnerable needed urgent and direct funding support.

125. We welcomed the call from the Committee for a full action plan. We do not consider that a full action plan ever came. Some steps were taken, in different areas, but there was not a comprehensive plan.

#### Local level decision making

126. From my analysis of the disclosure, it is clear to me that the issues set out above were not considered matters for Government/Cabinet, but rather for local authorities (i.e 'local level'), and thus not relevant within the overall decision-making process. The approach in Government was that local authorities would act only in response to self-referrals by victims. While concerns about women and domestic abuse were raised at Ministerial and Cabinet meetings, this was for information only. What concerns SWA about this approach is that it discouraged necessary coordination and communication between Central Government departments as to whether (a) local authorities were able to address the needs of survivors, and (b) whether the policies implemented by the Home Office were making any real difference, or whether more was required (see INQ000083602 and INQ000083604).

#### Representations by SWA and others

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<sup>53</sup> Second report of session 2019 – 2020, 27 April 2020



127. On 31 March 2020, SWA along with over 50 specialist organisations, charities, pressure groups and lawyers, wrote to the Secretary of State for Housing, Communities and Local Government to demand that urgent action was taken for survivors of domestic violence and demanded a separate emergency fund for local authorities to ensure they were able to adequately house survivors (RG/40)).<sup>54</sup>

128. On 3 April 2020, SWA signed a Joint letter to the Prime Minister from VAWG sector organisations calling for action at the highest level and state that during Covid-19 “more women and girls will be abused and are at risk in this period” (RG/41).<sup>55</sup> The letter set out the need for urgent strategy and details a series of actions for government figures to enact in order to prevent and reduce abuse during the epidemic, and was signed by over 20 organisations. The letter called for commitment at the highest level of government and from those leading key areas of public life to ensure there is zero tolerance of abuse, and to work with us so survivors of VAWG and their children can access the specialist services and other support they need. We made recommendations for individual government departments, and wider recommendations such as:

- Resourcing the specialist support sector:
- Crisis response planning and coordination involving VAWG and abuse experts
- Strong public messaging and guidance on VAWG
- Equal protection for migrant survivors

129. A substantive response was not received from a minister until 14 October 2020 (RG/42).

130. On **27 April 2020**, as it became clear that no response to the sector-wide campaign was forthcoming, SWA took steps to indicate a legal challenge and along with Southall Black Sisters, sent a pre-action protocol letter against the Government (RG/43). The legal action was accompanied by an email campaign – over 750 people sent emails to Priti Patel and Robert Jenrick in support. Given the urgency, we requested an abridged time for a response, and by no later than 4 May 2020. The pre-action letter argued that the inevitable consequence of the absence of an increase in suitable safe accommodation in response to the current crisis is an increased risk of the ill-treatment, harm and potentially death, of

<sup>54</sup> Measures Urgently Required to Protect and Support Domestic Abuse Survivors, dated 31 March 2020

<sup>55</sup> [An-open-letter-to-the-prime-minister.pdf \(endviolenceagainstwomen.org.uk\)](#)

victims of domestic violence and that the absence of sufficient safe accommodation and measures to facilitate effective access to such accommodation for those exposed to domestic abuse was:

- i. A failure to take all reasonable steps to implement practical and effective measures to prevent individuals from being subjected to torture, inhuman or degrading treatment or punishment, contrary to Article 3 ECHR.
- ii. An unjustified interference with the private and family life of victims of domestic abuse and that of their children in breach of Article 8 ECHR

131. The letter also argued that the failure to make adequate provision of safe accommodation disproportionately affected victims of domestic violence (who are disproportionately women) and therefore constituted unjustified discrimination contrary to Article 14 ECHR.

132. Finally, the letter argued that the Government had failed to properly monitor the impact of social distancing requirements during the pandemic on victims of domestic abuse, to gather evidence and review Government guidelines in the light of such evidence and considerations. The Government was at that point already well aware of the concerns about the increase in domestic abuse incidents, and aware of the increased domestic homicides and we argued that such a failure to monitor and to review the impact of Government guidelines on social distancing on victims of domestic abuse victims and to implement immediate measures for protection was unlawful and in breach of the public-sector equality duty contained in the Equality Act 2015 s 149.

133. On 2 May 2020, the government announced an additional £76m to support survivors of abuse (RG/44).<sup>56</sup> In total, it was said that £10m was to be allocated to safe accommodation services, with £25m going to help survivors of domestic and sexual abuse access services during the pandemic. £0.7 million was to support organisations that provide support to kinship carers, foster carers or to adoption and care leaver provision and £3m per year until 2022 to fund the work of Independent Sexual Violence Advisers, with a further £3.8m to go to community-based domestic-abuse and modern-slavery services and charities. The Home Office also promised £7.8 million in emergency support for charities helping vulnerable children who have been impacted by the coronavirus outbreak, including children at risk of sexual abuse and criminal exploitation.

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<sup>56</sup> [Coronavirus: Government pledges £76m for abuse victims - BBC News](#)

The Department for Education pledged more than £26.35 million to support vulnerable children, towards supporting the families of disabled children and to safeguard groups including care leavers and children in the early years.

134. SWA believes that this announcement of funding was a response, in part, to a sector-wide campaigning and the accompanying threat of legal action. Whilst it was welcome and this funding helped to extend Solace's emergency accommodation project, the fight was far from over. The Mayor's Office of Policing and Crime, alongside support a charitable trust, worked with providers in London to begin developing new safe accommodation services for domestic abuse victims in London ahead of this funding being announced which should be commended.

### **Subsequent regional and Tier lockdowns**

135. Following the lifting of the first lockdown, on 8 July 2020, SWA joined with sector colleagues to highlight the ongoing risk to domestic abuse survivors. We called on Government to extend the period of spend for emergency funding beyond the 31<sup>st</sup> October 2020 (RG/45).<sup>57</sup> At this point, VAWG organisations were being expected to spend the emergency funding and return to 'business as usual' by 31 October. It was noted that this would leave the women we supported unable to seek help and our organisations at increased risk. We were anxious to ensure that the government had learnt lessons from the rise in domestic abuse during the first lockdown. However, no steps were taken by Government during the rest of 2020 – at a time when there were regional lockdowns, subsequently the Tier system, then a national lockdown in November and then the run-up to Christmas – to learn lessons from the rise in domestic abuse during the first lockdown.

### **December 2020**

136. On the 19 December 2020 the Prime Minister announced that large swathes of the country would now be in tier 4 and tighter Christmas restrictions in place across the entire country in light of the new variant of Coronavirus. During his announcement the Prime Minister referenced "limited exemptions" to the law requiring everyone to stay at home, but again did not explicitly reference people subjected to abuse at home. Christmas is historically a period when levels of abuse can surge and this year it was exacerbated by

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<sup>57</sup> Easing of Coronavirus Restrictions: Joint Statement from VAWG sector organisations, dated 8 July 2020

the restrictive measures, so we were disappointed at the omission in this key public announcement.

### Lockdown 2021

137. On 4 January 2021, when the Prime Minister addressed the nation to announce a further lockdown, for the first time he mentioned domestic abuse as an exemption to the stay at home requirements. He said ***“You may only leave home for limited reasons permitted in law, such as to shop for essentials, to work if you absolutely cannot work from home, to exercise, to seek medical assistance such as getting a Covid test, or to escape domestic abuse.”*** We were finally relieved that such a message was being said unequivocally during a public announcement and therefore had a large audience, but this also showed that this platform for communications could and should have been used throughout the pandemic.

### Representations on learning the lessons from lockdown

138. SWA later provided evidence to the Home Affairs Select Committee on Home Office preparedness for Covid-19 (RG/46)<sup>58</sup>, written evidence to the Public Accounts Select Committee on Covid-19: Housing for Rough Sleepers (RG/47) in January 2021,<sup>59</sup> and Written evidence to the Joint Committee on Human Rights Committee on The Government’s response to Covid-19: human rights implications (RG/48).<sup>60</sup>

139. SWA also published a report in March 2021, containing research undertaken jointly with Justice Studio and the University of Greenwich, on the impact of the pandemic on access to safe and affordable housing for domestic abuse survivors *“When I needed you to protect me, you gave him more power instead” Covid-19 Lockdown and Domestic Abuse* (RG/3)<sup>61</sup>. That report found that perpetrators were able to use lockdown because it gave them greater freedom to act without scrutiny or consequence. It stated that, although more financial resources did become available, *“we had to fight really for it”*. It recommended that the government provides long-term sustainable funding for the VAWG sector, along with other measures (such as enabling victims to stay in their own home or

<sup>58</sup> Exhibit report of Home Affairs Select Cttee 27 April.

<sup>59</sup> <https://committees.parliament.uk/writtenevidence/21582/pdf/>

<sup>60</sup> <https://committees.parliament.uk/writtenevidence/9199/pdf/>

<sup>61</sup> Solace Women’s Aid, *“When I needed you to protect me, you gave him more power instead.” Covid-19 Lockdown & Domestic Abuse*, March 2021

to access safe accommodation). We said *“it will take some time before we can calculate the full impact of the pandemic on domestic abuse and VAWG, but what is clear is the number of women and families reaching crisis point has increased and is likely to continue to rise throughout the spring and summer in parallel with the Government’s roadmap to reopen society and with its pathways to support”*. We drew attention to gatekeeping, unsuitable referrals to refuges, lack of suitable provision for women currently experiencing or at risk of street homelessness and lack of long-term safe, suitable and affordable housing. We specifically drew attention to lessons from the pandemic.

140. SWA also sent written submissions to the Home Office raising the need for the Government’s new VAWG strategy 2021 – 2024 to reflect the impact of the pandemic and the medium and long-term effects of the economic recession on VAWG and recognise significant increase in demand for domestic abuse services since the pandemic (RG/49).<sup>62</sup>

141. We also sent written submissions to the Department of Health and Social Care in response to their call for evidence for a Women’s Health Strategy and within this, we called for the Government’s new health strategy to ensure that sufficient mental health and therapeutic support was in place following the pandemic due to waiting lists often being closed during this period.

142. SWA created a Covid-19 business continuity plan as early as 13 March and made 41 iterations of the document which was widely distributed in the sector and in other support organisations. This included it being adopted by London Councils who started distributing it – this demonstrated that proactive decision-making was coming from SWA/the sector as opposed to the government.

### **The current situation**

#### Have effects of C19 & lockdown dissipated?

143. The impact on VAWG and the unparalleled number of survivors reaching crisis point and becoming unsafe in their homes during the pandemic has no doubt impacted the provision of accommodation and support for survivors today.

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<sup>62</sup> ‘The Government’s 2021-24 VAWG strategy must respond to the scale and impact of the parallel pandemic of VAWG’



144. There has been a lack of recognition of the long term impact of the pandemic. There has not been a step change in the funding received to support victims of domestic abuse to recognise that there were survivors who were delayed in reaching help (on average it takes 7 years of experiencing abuse before they reach SWA's services), the intensity of abuse experienced by survivors and the complexity of need and level of destitution that survivors come to VAWG services has maintained since the pandemic.
145. Without addressing the medium and long-term housing needs of survivors of VAWG, the combined impact of lockdown on VAWG, the pre-existing lack of accommodation provision, and gatekeeping by local authorities is likely to intensify.
146. Local authorities have themselves indicated that the Covid-19 pandemic may have impacted the provision of support - some explained they started building new capacity in response to the crisis, including delaying move-on from refuge due to illness, and impacting the availability of housing (RG/50).<sup>63</sup> They have also expressed that since the pandemic there has been an increase in referrals from survivors with high level support needs (RG/51).<sup>64</sup>

### **SWA concerns**

#### Were women and children adequately considered when decisions about the response to Covid-19 were made by the UK Government?

147. Overall SWA does not believe that those they support were adequately considered when the UK Government and particularly the Cabinet was deciding how to contain the spread of coronavirus. There was a lack of understanding of the impact of disasters and emergencies on domestic abuse, a lack of consultation with SWA and other VAWG organisations at the beginning of the pandemic. Additionally there were no steps taken to protect women with NRPF, a slow reaction to mitigate the rise of domestic abuse and increased resourcing. Flowing from this there was a lack of clear messaging and coordinated communication with the specialist VAWG sector, and a lack of consideration of the impact on marginalized women.

<sup>63</sup> DA Safe Accommodation National Expert Steering Group Annual Progress report 2021 – 2022 (para 14).

<sup>64</sup> [Evidence Hub: The Domestic Abuse Report 2022 - Women's Aid \(womensaid.org.uk\)](https://www.womensaid.org.uk/evidence-hub/the-domestic-abuse-report-2022)

148. In addition to the above, we say the Government lacked a regular review of support provided to women fleeing violence, and a failure to assess the needs gap as the pandemic went on.
149. There was also failures to consider the impact on survivors being able to access local authority statutory services, the impact on the increased demand and complexity for domestic abuse services and the impact on their workforce, as well as the long term impact that the pandemic would have on survivors. Each of these failings has been explored in detail below.
150. There were some positive steps taken by the Government as a result of pressure from and communication with the VAWG sector, including:
- i. You are not alone campaign from 11 April 2020;
  - ii. Funding to the sector particularly for technological support to allow for remote work (though see below on some of the challenges with this funding);
  - iii. Rail to Refuge scheme;
  - iv. Ask for ANI pharmacy scheme (which did not come until 14 January 2021) (RG/52);<sup>65</sup>
  - v. £10 million funding to increase safe accommodation which led to the establishment of emergency safe accommodation projects – the set-up of which was supported by MOPAC. This included a 70 bed accommodation project with SWA and SBS, ensuring that there was at least a third of beds reserved for women with no recourse to public funds throughout the project. This followed pressure from organisations such as SWA and SBS following legal action.
  - vi. The eventual acknowledgment of frontline domestic abuse workers are key workers for the purposes of testing, as well as for access to childcare, schools and educational establishments.
  - vii. The prioritisation of domestic abuse cases within the courts particularly around urgent measures such as Domestic Violence Protection Orders and Non-Molestation orders.
151. In addition, the early introduction of a section of the Domestic Abuse Act that meant that all women fleeing domestic abuse would be considered priority need for housing to seek to increase the provision of – whilst this was a positive development to try to tackle

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<sup>65</sup> <https://www.gov.uk/guidance/ask-for-ani-domestic-abuse-codeword-information-for-pharmacies#:~:text=Ask%20for%20ANI%20codeword%20scheme,-Ask%20for%20ANI&text=It%20was%20launched%20across%20the,now%20enrolled%20in%20the%20scheme>

housing gatekeeping practices by as noted below we saw some challenges with its implementation at a local level.

152. Whilst many of these were positive steps, most still came with challenges on the timing of the Government decision, bureaucracy that blunted their effectiveness and a lack of local consistency in implementation in changes which is outlined further below. The limitations of the government's measures were already being highlighted in Parliament as of 27 April 2020 where the House of Commons Home Affairs Committee Report *'Home Office preparedness for Covid-19 (Coronavirus): domestic abuse & the risks of harm within the home'* records that there was a need for a wider Government Domestic Abuse strategy and that there was a lack of coordinated and coherent national government led action plan (Relativity 75363 and see para 124). Also raised was the urgent need for Government to address additional barriers facing people with NRPF and the significant reduction in referrals to children's social care.

153. Additionally, several of these changes came from significant lobbying from the specialist VAWG sector, but with better preparedness and understanding of domestic abuse within Government these measures could have been built into early preparations and initial decision making, which would have prevented many women and children from suffering further abuse and given clearer routes to safety.

A lack of consultation with SWA (and other VAWG organisations)

154. There was no communication with SWA or, so far as we are aware, any other VAWG organisations in the run up to lockdown. As the pandemic was emerging in early 2020, when the Government was considering how to control the virus, they did not contact SWA, a leading national frontline organisation in domestic abuse, to seek their view on lockdowns and other proposed non-pharmaceutical interventions. SWA are not aware of the Government consulting with any organisations in this field at this time, although we understand that meetings began with VAWG organisations with the Ministry of Justice from late March 2020. SWA believe the result of this was a failure of the Government to deal with the foreseeable consequences of locking-down women in homes with their perpetrators.

155. In addition to the above, we are not aware of any engagement between the VAWG sector and government regarding the extent to which inequalities and vulnerabilities should be factored into emergency preparedness and pandemic planning in the UK prior

to January 2020. This further suggests that the government did not consider VAWG within their risk management and emergency planning procedures.

156. We consider that if experts in the field had been consulted, such as SWA and other organisations responding to VAWG, the issues outlined above could have been foreseen, pre-empted and mitigated against. We regard this as a fundamental lesson to be learned from the pandemic: that government should consult early on with experts who deliver specialist services.

157. As the UK Cabinet was making decisions to lockdown the UK, a rapid increase in domestic abuse levels was being documented in countries who had already locked-down and was being reported in the UK media. China saw a threefold increase in domestic violence cases during the Covid-19 outbreak (RG/36).<sup>66</sup> Stark statistics were also coming from France. On 28<sup>th</sup> March 2020 France's interior minister said that reports of domestic violence across the country had jumped by more than 30% since the country went into lockdown on March 17<sup>th</sup>. In Paris alone, cases were up by 36% (RG/53).<sup>67</sup> Yet, the Government seemingly ignored international experience as well as domestic expertise when decision making. Within Europe, countries like Italy, Spain and others set up nationwide programs to house abuse victims in hotels if existing refuges were full much earlier than the UK, while Germany made an open-ended pledge to fund shelters and other crucial services.

158. What is clear is that there was a general lack of communication at both a national and local level with specialist organisations throughout the pandemic. We understand from the disclosure that consultation was not had with any VAWG organisations until 23<sup>rd</sup> March 2020 (after lockdown had already been announced), see 52784 and 52779. SWA were not invited to this meeting and therefore are unaware of what was actioned as a result. However, for the reasons set out below no meaningful action was taken to mitigate the impact on VAWG particularly given the lack of effective messaging and delay in providing appropriate funding. We also note the lack of involvement from specialist groups, and the fact that key information would have been missing as a result (see in particular below paras 177-179).

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<sup>66</sup> <https://www.theguardian.com/society/2020/mar/28/lockdowns-world-rise-domestic-violence>

<sup>67</sup> <https://www.euronews.com/my-europe/2020/03/28/domestic-violence-cases-jump-30-during-lockdown-in-france>

159. In any event, at that stage, women and children were already restricted to their abusive homes and many had no way of accessing support from the outside world (or knowing how to), this meant that the lack of clear messaging was even more of a problem as outlined below. There should have therefore been earlier consultation when it was emerging that a potential lockdown was being discussed or ideally in their preparations because of the known link of increased VAWG in disasters/emergencies and reports from other jurisdictions.
160. We are also unsure how much consultation was undertaken at this time with the Victim's Commissioner and Domestic Abuse Commissioner between January and early April. Considering the decisions of Government, we believe consultation was limited and not acted upon. There is some reference in the disclosure to discussions between the Minister for Safeguarding and the Domestic Abuse Commissioner (for example, in Relativity 53220 which is a briefing for a meeting between the Minister and MPs dated 30 April 2020) but I have not seen the minutes of any of those meetings and it is not clear whether either were involved in the formulation of the government's response to the predicted rise in domestic abuse during lockdown. I do note, however, that as early as 26 March 2020, the minutes of a meeting between the Home Secretary and the Minister for Safeguarding records a series of recommendations, one includes 'stakeholder' engagement (Relativity 52784). We do not consider that there was any proper stakeholder engagement.

#### Lack of clear messaging

161. The lack of consultation with expert frontline organisations in domestic abuse was apparent in public messaging instructing the nation to lockdown on 23<sup>rd</sup> March 2020 – there was a distinct failure to have any nuance or information for those women who were suddenly in increased danger due to lockdown. The only message that was made clear when the first lockdown was announced was the Government's advice to 'stay at home'. The Prime Minister's speech on 23 March 2020, announcing lockdown, said that there were some reasons why people would be allowed to leave their homes – shopping for basic necessities, one form of exercise a day, medical needs, providing care or helping a vulnerable person and travelling to and from work if absolutely necessary. He did not mention domestic abuse. He also said "*these are the only reasons you should leave your home*" and "*if you don't follow the rules, the police will have the powers to enforce them*". (INQ 000086759).



162. Whilst the messaging that survivors could travel in order to be safe came in Priti Patel's article for the Mail on Sunday on 28 March and then again on 11 April 2020 through a press conference and twitter, that message was not clearly put over by government. I note also the Domestic Abuse Commissioner, Nicole Jacobs, called for clarification in the Government's messaging, so that people were made aware that they could leave their homes if at risk of domestic abuse and she conveyed this to the Home Secretary at the time (see INQ000052889). By 11 April 2020, several vital weeks had been lost where there was little in the public domain to suggest that survivors could leave or that the police could be called. Despite sustained media coverage of domestic abuse and a new awareness among the public, the message had not been routinely delivered in government press briefings, media rounds or in Parliament either during the first lockdown or in subsequent announcements of lockdowns.
163. Refuge, who run the National Domestic Abuse Helpline received calls from survivors worried that they would be arrested if they left their home to escape of domestic abuse, demonstrating the importance of clarity about exemptions to the rules at the earliest opportunity. There was also nothing to advise and reassure survivors who were shielding (either clinically vulnerable or clinically extremely vulnerable) on their entitlement to safe self-contained accommodation.
164. In absence of this SWA along with other VAWG groups wrote to the government on 3<sup>rd</sup> April 2020 calling for "Strong public messaging and guidance on VAWG" including clear statements that "violence and abuse will not be tolerated", that there should be "specific advice for those who experience harm at home" and that "all government communications, including the daily press conference, should be translated into a range of languages, including British Sign Language and be made available in easy read formats." (RG/41)<sup>68</sup> Subsequently, the government announced a public campaign highlighting domestic abuse, under the hashtag #YouAreNotAlone, on 11<sup>th</sup> April 2020 (RG/54).<sup>69</sup> SWA are unsure the extent to which translations were made available and whether steps were made to ensure that culturally appropriate materials were produced, and if they were, these were not brought to our attention or made readily available to us.
165. In any event, we note that the campaign ran between 11 April 2020 to 31 May 2020, with some further activity in July, August and September (Relativity 53891). There was no clear sustained message during the pandemic, or even in the 'YouAreNotAlone'

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<sup>68</sup> [Open letter Re: Covid-19 pandemic and preventing and responding to an increase in VAWG – 3 April 2020](#)

<sup>69</sup> <https://www.gov.uk/government/news/home-secretary-announces-support-for-domestic-abuse-victims>

messaging, that women could leave their homes with their children if they/their children were victims of domestic abuse. Although we note that in the statement provided by Patricia Hayes she advises that the Home Office worked with Black, Asian and Minority Ethnic strand working with social media influencers and specialist media outlets to advertise the campaign (INQ000215599).

166. As well as needing translated versions of the campaign, the Latin American Women's Rights Service have highlighted concerns that this campaign did not consider how it would reach Black and minoritised women and migrant women and that their needs are overlooked, despite being disproportionately affected by this crisis. In terms of distribution, online campaigns may not be suitable for migrant and Black and minoritised women due to the lack of access to wi-fi, smartphones and social media, amongst others.

167. In any case, SWA believe that if experts in the field were consulted at the material time prior to lockdown, issues like these could have been pre-empted and mitigated against.

168. It is instructive that none of the addresses to the nation, given by the Prime Minister or the Deputy Prime Minister in his place, informed the nation that they could leave their homes if they needed to, because of domestic abuse, until the address on 4 January 2021. SWA believes that this information should have been in these authoritative, highly publicized and watched, announcements.

169. Each time the Government announced a new lockdown or different tiered systems, there was a lack of proper engagement with specialist VAWG organisations about what needed to be done differently. It seems that no review was carried out, or whether any data was collected and considered in any meaningful way. To our knowledge, the Government did not engage with VAWG organisations in order to collect data on how to properly and effectively convey messages to women and girls at risk of domestic abuse, or how their messaging was / was not working. If any data was collected, it is unclear what was done to respond to that.

170. The lack of clear messaging meant that survivors were not aware of the support and services available to them, and/or how to access that support. Would they be able to leave their home without being arrested? If they left their home, would they be accommodated, with their children, immediately or would they have to return home to wait to be contacted? Was the housing office open? How would they be able to maintain contact? Were their

children able to go to school, enabling their parent to leave the house? Without proper, clear, concise messaging, the answers were vague and unclear.

171. We believe that, if the Government had consulted with us and others in the VAWG sector, we would have been able to help them with clear messaging, early in the process (before lockdown commenced) which were targeted appropriately and contained very clear and easy to understand information that people subject to domestic abuse were permitted to leave home and where to seek help.

Lack of consideration of how to identify women and children suffering abuse and the barriers to them accessing support

172. Statutory services were failing victims. As a result of the lack of clear messaging, as well as the restrictions put in place which created additional barriers, it is difficult to see how statutory bodies were able to properly identify those suffering abuse.

173. During lockdown, the women SWA support experienced difficulties in contacting local authority departments for support, such as homelessness departments and children's social care. We believe that this was an inevitable consequence of lockdown, but wish to point out that this had particular adverse consequences for survivors and should have been considered by government in its decision-making regarding the pandemic and lockdown, and that local funding should have been used more appropriately to address this. The lack of access to housing departments and adequate social housing and therefore the difficulties in finding move on accommodation from refuges meant that new places were not becoming available for women in need of urgent safety, and therefore prolonging those women being trapped with perpetrators.

174. The Home Office's subsequent launch of its partnership with pharmacies in January 2021 was a welcome step. We do, however, have some concerns. One is that pharmacies refer women to the specialist VAWG sector when women come forward, and this is an additional demand on our under-funded services. The second is that government publicity can alert perpetrators to the scheme.

175. The closure of schools and the safety net they provide for children, and their mothers was also a concern and it is unclear what collaborative efforts there were between the

Department of Education, Department of Health and Social Care and the Home Office, to ensure that those children suffering domestic abuse would be identifiable in the event of school closures and restrictions. As noted above (para 45), the highest peak in calls to our advice line was in September 2020 when schools re-opened after the summer holiday, 21% higher than in February before the lockdown and 138% higher than the quietest period during the first lockdown in April.

176. With the restrictions of in person visits to GP surgeries and hospital appointments, schools became an important source during the pandemic for identifying those children who were suffering domestic abuse in the home, and a vital access point for those children. Whilst there was some reference in Government Guidance on the closure of schools, to children becoming vulnerable by virtue of the pandemic and lockdown, 'vulnerability' was defined very broadly and seemed to be considered primarily in terms of those children who were 'clinically vulnerable.' It was not clear whether due regard would be had to those children who were suffering domestic abuse and whether they would fit into that definition. Additionally, whilst there was government guidance on pupils at risk going to school, the lack of interaction with schools, and a reduced ability to safeguard still led to more isolation for women and children experiencing abuse.

The lack of coordinated communication with the specialist VAWG sector, particularly smaller organisations, hampered their response.

177. Smaller specialist services, particularly those which are not commissioned by their local authority, and services led by and for Black and minoritised women and Deaf and disabled survivors have continued to report that communication and partnership working from statutory agencies has been poor.

178. Lack of communication at a national and a local level for those smaller 'by and for' organisations. IMKAAN noted that some local areas were only communicating with the commissioned services which is cutting out/excluding those supporting the most marginalised groups (RG/6).<sup>70</sup>

179. Information and advice about getting support on VAWG from the UK Government often ignored different national contexts and lockdown rules, creating confusion and additional work in signposting survivors to the right helplines and support. The lack of join up between

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<sup>70</sup> [Imkaan's Position Paper Outlines the #DualPandemics — Imkaan](#)

UK Government and devolved government communications has resulted in confusion for citizens, and a lack of confidence in the messages to survivors.

The slow reaction of the Government to mitigate the rise of domestic abuse and other issues faced by groups supported by SWA, and consideration of increased resourcing.

180. The UK went into lockdown on 23 March 2020. On 26 March 2020, the Guardian ran with the headline *Warning over rise in UK domestic abuse cases linked to coronavirus* (RG/35).<sup>71</sup> Yet, the Government failed to provide emergency ring-fenced funding for safe and suitable accommodation to SWA and others in the sector until 2<sup>nd</sup> May 2020, following the threat of a legal challenge by SWA and Southall Black Sisters and the publication of the House of Commons Home Affairs Committee report. Similarly, there was a lack of consideration as to the need to increase resourcing of much-needed mental health and therapeutic support services for survivors when decision-making. The Government were *forced* to act, as opposed to considering needs prior to decision-making, allowing for provisions to be made available.

181. There appeared to be no reflection and collection of data to analyse the increase of domestic abuse in the UK during lockdowns. Doing so in the first lockdown could have helped Cabinet decision making in subsequent second and third lockdowns.

182. Whilst there was funding for the sector announced by Government, there were significant challenges for organisations in accessing and using the resources:

- i. The funding was provided only following the threat of legal action and publicity, and following weeks of urgent calls from the VAWG sector. By the time funding was announced, services were already in overcapacity and there were many women who had not received the urgent support they needed and/or faced delays to support as a result. It also remains unclear how much of this funding reached the frontline via support services. In the government's response to the Home Affairs Committee's report on Covid-19 preparedness, the government only accounted for a proportion of the funding but explained that the rest had

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<sup>71</sup> <https://www.theguardian.com/society/2020/mar/26/warning-over-rise-in-uk-domestic-abuse-cases-linked-to-coronavirus>



been allocated across Government departments without any further detail.<sup>72</sup> The Minister for Safeguarding was asked about how much of the funding had reached the frontline in Parliament in January 2021 and was unable to provide any more detail (RG/55).<sup>73</sup>

- ii. Emergency funding for the VAWG sector took over four months to be made available and was then distributed via four complex funding streams. This meant money was very slow to reach the frontline, especially for smaller organisations who lacked the staff capacity to apply for multiple, complex funding streams. By the time funding reached, the cumulative effect, or period of increased exponential demand for services was very evident. This means that the emergency fund will not sufficiently address the historical funding shortfall, or the period of the cumulative effect.
- iii. Whilst additional funds were provided by Government they did not match the increased need. The funding often took longer to get to frontline organisations to allow them to increase their capacity.
- iv. Short monitoring deadlines are particularly burdensome on smaller and Black and minoritised organisations who already have limited capacity and had faced reduced funding over the years following the pandemic. Some requests for evaluation and monitoring information was just a few working days.
- v. There were multiple funding “cliff edges” particularly in October 2020 and March 2021 where organisations were told that they had to spend all funding in line with Treasury spending cycles rather than allowing organisations to use the funding flexibly to meet demand. These deadlines for spend did not reflect the reality of the decisions and often notice of any further funding would come late, leading to challenges in recruiting and retaining staff who had only recently been employed.
- vi. As well as cliff edges in funding directly to the VAWG specialist services, delays to the next spending review setting out local authority spending amounts means that there are no set national or local budgets for VAWG services, despite

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<sup>72</sup> [Home Office preparedness for Covid-19 \(coronavirus\): domestic abuse and risks of harm: Government Response to the Committee’s Second Report - Home Affairs Committee - House of Commons \(parliament.uk\)](#)

<sup>73</sup> [Domestic Abuse and Hidden Harms during Lockdown - Hansard - UK Parliament](#)

unrelenting levels of demand and challenge. This meant organisations were facing uncertainty on whether their commissioned services would continue, leading to uncertainty about redundancies and staff futures.

- vii. There were also delays on announcements around fundings at later stages of the pandemic. Further funding was not announced until February 2021 when the UK was in the middle of its third and longest lockdown. This funding was welcome to support the ongoing work from April 2021 onwards, but information on how the funding would be allocated was not provided until very close to the funding window starting. There were also considerable delay to announcements of additional funding for community-based services which support the majority of survivors. As a result, there was considerable uncertainty in the sector which detrimentally affected our own ability to plan and deliver our service to as many victim-survivors as possible, including complex cases.

183. The delays in decision-making around funding and lack of clarity in the details demonstrated that, even a year after the pandemic struck, the government was acting reactively and with insufficient urgency to the evolving situation, rather than acting on effective planning and adapting to the urgency of the sector's needs promptly. We feel if the government's emergency planning had been more effective and, in particular, if it had taken on board the expertise in the VAWG sector and the experiences that frontline services were facing, the strain and shortfall in the service could have been mitigated. If more consideration of what impact NPI measures would have on domestic abuse rates had taken place at preparedness stage, funding may have been allocated quicker and more appropriately to services.

Decision not to take further steps to protect women with no recourse to public funds experiencing domestic abuse

184. Before COVID-19 VAWG services and others had documented that the fear of immigration enforcement was being weaponised by perpetrators of abuse. Many women with no recourse to public funds had few options to access to support due to restrictions on their ability to access benefits leaving them economically vulnerable and without a safety net. See *The Domestic Abuse Bill & Migrant Women: A Briefing Paper by Southall*

*Black Sisters*,<sup>74</sup> *The Domestic Abuse Bill & Migrant Women: A Briefing Paper by Southall Black Sisters No 2*,<sup>75</sup> *Covid-19: Briefing to the Home Affairs Committee* as exhibited in witness statement of Hannana Siddiqui<sup>76</sup>. During the Covid-19 pandemic, specific representations were made that the condition of NRPF should be suspended, particularly for women subject to domestic abuse: see letter signed by SWA among others dated 31 March 2020 to the Secretary of State for Housing, Communities and Local Government, letter to the Home Secretary signed by more than 20 BME specialist frontline services *Step Up migrant women campaign* 31 March 2020 (RG/56).<sup>77</sup> The House of Commons Home Affairs Select Committee recommended in its report of 27 April 2020 that any individual with NRPF should, following referral from a domestic abuse service, be entitled to access state support during the coronavirus crisis, regardless of their immigration status.

185. There is no doubt that Government was aware of the issue of NRPF status, for example it was considered repeatedly in relation to self-isolation for travellers, see for example the paper presented by the Department for Transport at the COVID-19 Operations Committee meeting on 14 September 2020 (see INQ00008999).
186. Despite these representations, the Government made the decision to maintain the no recourse to public funds conditions despite significant concerns raised by the specialist VAWG sector. As a result, migrant victims of domestic abuse were prevented from accessing vital services and were also potentially subject to immigration enforcement.
187. SWA has concerns that the acute hardship suffered by migrant women with NRPF (the majority of those from black and ethnic minority communities) impacted further by the pandemic, was not considered or acted upon by the Government. That is, in their initial decision-making, or subsequent decision-making throughout January 2020 – Spring 2022. SWA believes if these women, and any persons with NRPF in the UK, were properly considered then NRPF conditions should have been lifted during the pandemic, to allow access to at least 3 months benefit to relieve their acute hardship (RG/57).<sup>78</sup>

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<sup>74</sup>March 2019

<sup>75</sup> March 2020

<sup>76</sup> Joint Council on the Welfare of Immigrants (JCWI), 25 March 2020

<sup>77</sup> [COVID-19: DOMESTIC ABUSE SERVICES CALL FOR URGENT SUPPORT FOR MIGRANT VICTIMS BLOCKED FROM SAFETY, HEALTHCARE AND REFUGES – PRESS RELEASE – Step Up Migrant Women](#)

<sup>78</sup> [Local Authority Responses to people with NRPF during the Pandemic – Research Report, August 2020](#)

188. SWA believe, as a minimum, that consideration should have been given to the limitations of the Destitution Domestic Violence Concession ('DDVC') which enables those (with NRPF) who might be able to apply for leave to remain under the Domestic Violence Rule ('DVR') access to public funds while they submit their application. The DVR and therefore the DDVC only applies to those on spousal visas and not those on other types of visas. This left a number of women experiencing domestic violence unable to apply for the DVR as they were in the UK on non-spousal visas. At the very least, SWA believe the DVR should have been extended to all visa types during the pandemic.

189. Finally, in relation to migrant women SWA support, consideration should have been given to considering how to ensure funding would reach these migrant survivors who are generally harder to access. Actions, such as those documented above, would have ensured migrant women with NRPF would have access to public funds as an emergency measure to allow them to escape abuse during the pandemic. Yet no action was forthcoming, despite warnings from the Local Government Association on 3 April 2020 (INQ000103852), 1 July 2020 (000103855) and 13 July 2020 (INQ000103781). The LGA said on 22 December 2020 "It is vital that the government lifts the NRPF condition to help prevent homelessness for the migrants who can't currently access the welfare safety net" (RG/58).<sup>79</sup>

190. We can commend the Mayor of London who worked with SWA and Southall Black Sisters to ensure that bed spaces in emergency accommodation was accessible for women with no recourse to public funds, although even with a third of beds reserved, this was still not sufficient capacity to support this group. The refuge was able to support a set number of women with no recourse to public funds over the course of the first contract and there was particularly high demand for those places. Between May and November 2020, the project turned 60 referrals away due to unsuitability. Half of those referrals turned away– the biggest reason - were due to lack of space for women without recourse to public funds. The next biggest reason was because the women's mental health needs were too great to be managed safely at the refuge.

#### Lack of consideration of the impact on marginalised women

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<sup>79</sup> [LGA responds to Crisis report on preventing 60,000 people from becoming homeless in England, 22 December 2020](#)

191. Whilst there was a recognition that the health outcomes of the pandemic had a disproportionate affect on groups that already faced oppression however this didn't feature heavily in the Government's response to increased VAWG.

192. Disabled women and girls, including those with learning disabilities, already face very disproportionate levels of sexual and domestic violence, and very high barriers to accessing appropriate support. Being to any extent dependant on paid or unpaid carers can be a conducive context for abuse, and perpetrators target such vulnerability. The home isolation in this crisis removed many disabled women's access to routine support networks, and they should already be prioritised as needing specific abuse prevention planning (RG/27).<sup>80</sup>

193. The way in which funding was distributed to the sector also didn't recognise the role that smaller 'by and for' organisations play in reaching out to communities, particularly for Black and minoritised women. There was a lack of ringfencing of funding to ensure that it reached those supporting the most marginalised women e.g. by and for organisations. This was particularly needed as these organisations are less likely to have local authority funding which was a mechanism to secure funding for additional capacity for larger locally commissioned survivors providers. SWA recognised that we had some alternative funding streams as a commissioned service, through funding given to local authorities to deal with the pandemic, which were less likely to be open to smaller organisations and central Government funding could have helped to address this.

Lack of consideration given to the safety for those living in domestic abuse refuges

194. We were concerned about the level of guidance given to organisations supporting victims of VAWG. Solace produced and internally published our first Business Continuity Plan on 13 March 2020, 10 days prior to first lockdown. Between March 2020 and February 2022, we produced 41 iterations of the plan which demonstrates the burden for organisations due to the lack of specific VAWG sector information.

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<sup>80</sup> Rapidly Compiled – Initial Briefing on the COVID-19 Pandemic and the Duty to Prevent Violence Against Women & Girls, End Violence Against Women Coalition, April 2020



195. On 23 March 2020 the Government published guidance for refuges during the pandemic (R 176557).<sup>81</sup> This was welcomed, given the close proximity of living conditions in refuges. It is normal for families to live in one room and for three families to share a bathroom and kitchen. The evidence SWA gathered fortunately showed little evidence of virus transfer between families in refuges, aside from transfers in December 2020 between families living in emergency accommodation based in a hotel. We believe that this was due to the diligence, hard work and commitment of VAWG providers and their staff (including our staff). In any case, this guidance published early in the pandemic was not updated throughout the period in question. By comparison, the guidance for commissioners and providers of hostel services for people experiencing homelessness and rough sleeping was updated regularly (RG/59).<sup>82</sup> This points to a lack of adequate consideration of this group living in overcrowded and cramped conditions.

Lack of clarity on the status of workers within the domestic abuse sector in line with social care workers

196. Initially frontline workers in VAWG services were not listed as a type of 'keyworker' and this had to be clarified following lobbying from organisations. There was also a lack of clarity about whether refuge workers were able to gain access to test and trace equipment, PPE and early vaccination, despite working in close proximity and playing a social care role. Initially domestic abuse providers had to enquire with individual local authorities or health authorities to get clarity on whether they were eligible for testing and vaccinations in line with health and social care staff. This was later clarified at a London level on 2 February but there should have been a national level response to ensure consistency across local areas and we would recommend that clarity for refuges access to testing, PPE and vaccination is made earlier and at the same time as other social care workers in future.

Lack of consideration of the impact on the increased demand and complexity for domestic abuse support services and the impact of their workforce

<sup>81</sup> [COVID-19: guidance on isolation for domestic abuse safe-accommodation settings,](#)

<sup>82</sup> [COVID-19: guidance for commissioners and providers of hostel services for people experiencing homelessness and rough sleeping](#)

197. We want to commend the dedication and innovation of staff at VAWG organisations, particularly those on the frontline, across the UK during the pandemic. Despite the incredible challenges during this period, their continued commitment to victims of domestic abuse will have saved lives and protected women from further abuse.
198. As noted in detail below, during lockdown, SWA saw an increase in women contacting them for support during the pandemic and that those contacting them were often in more urgent and unsafe situations or had a range of complex needs which required increased levels of support. This led to SWA's frontline team facing increased pressures to meet the needs of people contacting them and were having to work for longer periods with women to support them. Imkaan also noted that women managing to access services were manifesting higher rates of self-harm, anxiety, and distress, driving a need for mental health provision and increased contact from services<sup>83</sup>. Other specialist services also reported that women who made contact during the pandemic had needs that are complex and are often taking longer to work with than average; women were more desperate than ever and services reported more contact with women who were suicidal.
199. Whilst refuge staff were often still on site, many SWA workers had to continue this traumatic work in their own homes and the increased case complexity impacted their work-life boundaries. Organisations sought to put steps in place to support the wellbeing of their workforce, despite stretched budgets, but additional funding was needed to increase the capacity of the sector.
200. Staff working in refuges faced significant pressures to keep a Covid-19 environment for service users and themselves during the pandemic, alongside supporting women who were fleeing abuse in desperate situations. This was made more challenging due to little access to PPE, testing and vaccinations and the regular difficulties they faced in trying to access these essential safeguards and protections. The support from local authorities, who fund the refuges, to access these protections varied - some took significant measures to try to help us access them, with others taking little interest. There was also increased workload through the reporting covid cases and additional extra cleaning, alongside the advocacy and support for service users.

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<sup>83</sup> *The Impact of the Dual Pandemics: Violence Against Women & Girls & Covid-19 on Black and Minoritised Women & Girls*, Imkaan, May 2020

201. The vast majority of the workforce employed by SWA and other specialist organisations are women and therefore the pressure on these services and their staff was gendered. This was further exacerbated by the highly gendered impact of the wider pandemic including women taking on more caring responsibilities in the home and being more likely to be in low paid keyworker roles or insecurely employed. These pre-existing inequalities for a largely female workforce were not taken into account.

Lack of consideration for the long term impact that the covid-19 pandemic would have on survivors and the needs they would have when reaching

202. A positive consequence of the covid pandemic is that it has significantly increased the awareness about the prevalence and impact of violence against women and girls. It has also provided women who may not have previously been aware of support out there to find it following the end of lockdowns. However, we do not believe Government actions following the pandemic have recognised this. Levels of people reaching out to VAWG services have reported to have stabilised at higher levels but funding is generally returned to pre-pandemic levels. As a significant amount of funding comes from local authorities, the continuing challenges for local authority budgets is also limiting the ability for funding increases to reflect the increased need.

203. On average it takes women 7 years for women to reach SWA's services. Whilst the Government provided short term funding to support services to move online and increase capacity during the pandemic, there has been minimal acknowledgment of the increased demand services which has continued since the pandemic. In particular the complexity of women's needs when they reach our services has continued to stay high – before the pandemic we would have someone reach out to our advice line who was on the brink of homelessness a couple of times a month, and now this happens several times a week. We are also continuing to see women approaching services with significant mental health needs, self-harming and suicidal ideation on a regular basis, something that was far less prevalent before the pandemic.

204. When SWA responded to the Home Office VAWG strategy, we stated the strategy must address the cumulative impact of successive lockdowns on the scale of abuse survivors have been subjected to, and their trauma and mental health needs as a result. But the Home Office's VAWG strategy and domestic abuse plan that stemmed do not set out significant changes to their approach or resourcing to address this.<sup>84</sup> There has been a limited funding strategy to recognise the heightened level of demand for services which has continued post pandemic and that so many more women are coming to services with more complex needs and in a more desperate situation. In particular, additional funding to meet increased mental health needs was not recognised in these strategies and plans.
205. In other sectors such as the NHS, the Government has acknowledged the long term impact of the pandemic on the services and the workforce but a similar recognition has not taken place for domestic abuse.
206. Early on in the pandemic, IMKAAN called for a resourcing strategy that is about long-term sustainable funding to enable frontline specialist VAWG services, including Black and minoritised women's services, to continue to deliver support post pandemic – noted this should be between 36 to 60 months of funding (see *The Impact of the Dual Pandemics: Violence Against Women & Girls & Covid-19 on Black and Minoritised Women & Girls*, para 27 above). Whilst there has been some increases in funding for Independent Domestic Violence Advocates (IDVAs) and for more safe accommodation under the Domestic Abuse Act, there has not been a significant increase in funding to the sector to meet the increased demand and complexity of women's needs post pandemic.
207. The trauma of supporting women who have experienced domestic abuse during the pandemic, whilst living through it themselves, has also not been recognised. Many VAWG organisations are facing challenges with recruitment and retention of staff, in part due to many workers needing to take a break from frontline work due to the trauma and stress related to the pandemic.

### **Assessment of policies between lockdowns**

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<sup>84</sup> Solace written response to the Home Office call for evidence: *Violence against Women and Girls (VAWG) strategy 2021 – 2024* (SWA, 2021).  
[https://www.solacewomensaid.org/sites/default/files/solace\\_submission\\_vawg\\_strategy\\_call\\_for\\_evidence\\_final.pdf](https://www.solacewomensaid.org/sites/default/files/solace_submission_vawg_strategy_call_for_evidence_final.pdf)

208. We are not aware of any assessment as to the effectiveness, or otherwise, of the measures implemented during the first lockdown. What we do know is that:
- a. Domestic abuse calls to the police during the first lockdown declined but calls to charities significantly increased.
  - b. Domestic homicide rates slightly increased towards the later part of 2020.
209. Whilst there was a Hidden Harms summit on 21 May 2020 (almost a month after the 'You Are Not Alone' campaign was launched) (INQ000181673) we were not consulted as to whether any changes were necessary. Accordingly, we see domestic abuse rates continued to be high in the autumn/winter of 2020 and during the 2021 lockdown without any real change in the direction of policy. We know this is particularly the case for those survivors of domestic abuse with NRPF<sup>85</sup>.
210. Although there was periodic review of disproportionately impacted groups, this focused narrowly on disproportionate health outcomes. There was therefore a missed opportunity to consider the disproportionate impact of Covid-19 measures on victims of domestic abuse and migrant women with NRPF.
211. From our consideration of government disclosure, it seems that there was a system of Senior Responsible Officers (SRO) who were appointed to co-ordinate or review certain areas. It does not appear that domestic abuse was designated as a priority workstream or that there was a SRO appointed to co-ordinate or review the support provided to victims of domestic abuse. It appears that the purpose of the SRO was to oversee the area that they were responsible for— a full list of SROs is at 218319. There is no SRO for women and girls (although there is for vulnerable children) and there are no SRO briefings that address the rise in domestic abuse. We question why there was no such SRO for VAWG.

### **Summary of actions that ought to have been taken**

212. As discussed above, there are a number of areas in which the government's decision-making was lacking. We suggest the following actions which would have built greater

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<sup>85</sup> See Baroness Burt in the House of Lords' debate *Domestic Abuse and Hidden Harms during Lockdown*, 19 January 2021: [Domestic Abuse and Hidden Harms during Lockdown - Hansard - UK Parliament](#)



resilience into sector and improve the response, though this list should not be considered exhaustive:

a) Consultation and engagement with VAWG sector prior and during pandemic:

There was extensive expertise and experience in the VAWG sector which was available to the government to draw on. Had there been greater engagement with those responding to VAWG prior to the pandemic and during its escalation, pre-emptive plans could have been put in place and many of the risks could have been mitigated. This may well have translated into a reduction in the number of women that experienced and/or remained in domestic abuse situations in real terms. Consultation with the Domestic Abuse Commissioner and Victim's Commissioner in both early consultation and decision making around emergency preparedness should have been undertaken. The Domestic Abuse Commissioner should have played a key role in decision making throughout the pandemic.

b) Proper funding of both statutory and VAWG services, and prompt information about the details of funding plans:

213. As discussed, we welcomed the additional funding that was provided during the escalation of the Covid-19 pandemic. However, the funding was insufficient to meet the full demand; additional funding was delayed and required the threat of legal challenge for action to be taken; the details of funding allocation was unclear and restrictions on spending prevented us from effectively responding to the emergency; and related need for additional funding of statutory services, including housing, was not recognised. Emergency funding ought to have been included in planning prior to pandemic, and should have been adaptive to the evolving needs of the situation. It is particularly crucial that these funds reach those needs the groups that support the most marginalised including Black and minoritised, disabled, LGBT+, survivors of domestic abuse. This should be done by ensuring that national and local funding reaches led 'by and for' organisations supporting these groups .Finally there needs to be longer term planning and resourcing from Government for the VAWG sector.

c) Clearer messaging and communications plans on domestic abuse support and exemptions to NPI measures:

214. The messaging around domestic abuse in relation to the Covid-19 pandemic ought to have been clearer. For example, Government representatives at all levels should have

stated early, clearly and regularly that lockdown rules did not apply to those fleeing domestic abuse. There should have also been promotion of support services through government communication channels alongside any exemptions from restrictions from the beginning of the NPI measures. The statutory rights of those fleeing domestic abuse should have also been made clear to housing officers, through training or other means, to ensure that victim-survivors were not turned away from essential support services at a time when they had limited options for alternative safe accommodation such as with family and friends. If stay at home or travel restrictions are implemented for future pandemics, it should be clearly and consistently highlight that there are exemptions for where home is not safe and for domestic abuse survivors to seek support from the start of the communications about such restrictions.

d) Suspension of NRPF conditions and broadening of DDVC

NRPF conditions ought to have been suspended after the pandemic struck and the policy reviewed overall to mitigate the disproportionate vulnerability to violence and barriers to escape that this policy creates for women with NRPF status. The DDVC ought to have been expanded to include people experiencing domestic abuse on all visa types.

e) Greater consideration for trans women and non-binary communities

There ought to have been greater consideration for the needs of trans women and non-binary experiencing domestic abuse and the specialist services required to protect and support them.

f) Automatic recognition of domestic workers in refuge and community services as frontline health and social care workers to ensure so they have access to PPE, testing and vaccinations.

g) Immediate and direct communication with the specialist VAWG sector to ensure they had access to provide immediate and direct communication channels for critical information and guidance related to the pandemic. Many organisations relied on their own continuity planning and research, or local advice (which was inconsistent) to adapt to constant changes to restrictions and options for victims. It is particularly important that smaller organisations and 'by and for' organisations supporting Black and minoritised women, disabled women and LGBT+ victims were included in these communications as they are often not funded by local government and therefore were not being supported at a local level.

- h) Joint support and collaborative between public, third sector and private sector bodies should be encouraged, and built into preparation plans. SWA was able to work in partnership with private sector organisations to provide significantly discounted accommodation provision to host emergency accommodation services for domestic abuse survivors, and local and national governments can play a role in coordinating this.
- i) Ensure that there are sufficient plans for an increase in refuge and safe accommodation options for people fleeing domestic abuse when 'stay at home' orders, travel restrictions or closure of support services is a likely response in future pandemics. SWA and SBS with significant support from the Mayor's Office for Policing and Crime (and partially funded by central Government) were able to mobilise a 70 bed safe accommodation project in May 2020 which ran until November 2021. The consistent need for these additional bed spaces showed the importance of additional safe accommodation provision due to increased domestic abuse, the lack of alternative places for women to flee and that bed spaces in existing provision were not becoming available due to a lack of move on options for survivors. It was particularly important that bed spaces were ring-fenced for survivors with NRPF.
- j) Address underfunding of the specialist VAWG sector to ensure its sustainability and ensure services' can recover from the crisis. The pandemic has highlighted the need for sustainable, long-term funding for specialist services, and ringfenced funding for 'by and for' services supporting marginalised survivors, to ensure this sector can cope with future challenges. Funding is also needed to ensure that the increased complexity of women's needs when approaching services can be met over the coming years.

## **Conclusion**

215. For the reasons set out above, SWA does not believe that those they support were adequately considered when the UK Government and particularly the Cabinet was deciding how to contain the spread of coronavirus. There was a lack of understanding of the impact of disasters and emergencies on domestic abuse, a lack of consultation with SWA and other VAWG organisations at the beginning of the pandemic, a lack of steps taken to protect women with NRPF, a slow reaction to mitigate the rise of domestic abuse and increased resourcing, a lack of clear messaging and coordinated communication with

the specialist VAWG sector, and a lack of consideration of the impact on marginalized women.

216. There was also failures to consider the impact on survivors being able to access local authority departments and services, the impact on the increase demand and complexity for domestic abuse services and the impact on their workforce, as well as the long term impact that the pandemic would have on survivors.

217. There was no collaborative effort from different Government departments to work together to tackle the issues above. The Home Office and Ministry of Justice were tasked with considering the impact of the pandemic on survivors of domestic abuse, but despite the clear relationship between mental health and domestic abuse, the fact that schools and health services were a primary source for identifying those women and children suffering abuse, and the inevitable need for survivors to access safe housing there appears to be little if no discussion between the Home Office, Ministry of Justice, Department of Education, Department of Health and Social Care and Ministry of Housing Communities and Local Government.

**Statement of Truth**

I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief of its truth.

Signed: \_\_\_\_\_ Personal Data \_\_\_\_\_

Dated: \_\_\_\_\_ 20 September 2023 \_\_\_\_\_