

UK COVID-19 Inquiry: Module 2 - Rule 9 Request to Solace Women's Aid

Reference: M2/R9R/SWA/TJS

Please provide the following information:

1. A brief overview of the history, legal status and aims of the organisation or body. Please explain whether the work of the organisation or body is UK wide, or is instead confined to England, Scotland, Wales or Northern Ireland only.

- i. Solace Women's Aid ("SWA") was established over 48 years ago and is one of the single largest providers of services to help end gender-based violence.
- ii. SWA's vision is a world where everyone is able to live safe and independent lives which are free from gender-based violence, abuse and exploitation.
- iii. Their mission is to end the harm done through gender-based violence and to work alongside survivors to achieve independent lives free from abuse. Their 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.
- iv. SWA's key objective is the promotion of the physical, emotional and psychological well-being and safety of victims of domestic, sexual and associated abuse.
- v. The legal status of SWA is as a registered charity and company limited by guarantee.
- vi. The work of SWA is England wide.
- vii. 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.

2. A brief description of the group(s) which the organisation or body supports or represents.

- i. SWA supports individuals who are survivors of abuse, particularly women, young people and children.
- ii. They have an inclusive definition of women to include trans women. Their services seek to support and represent trans women and non-binary people.
- iii. They support survivors experiencing homelessness and those who have No Recourse to Public Funds ("NRPF"). They support migrant women, women from black and ethnic minority backgrounds.

- iv. Many of those SWA support face intersectional discrimination and come from working-class households. They also commonly suffer from poor mental and physical health as a result of the abuse they have suffered.
- v. In the Inquiry, SWA seeks to represent the viewpoints of all of the above.

3. A brief overview of the work of the organisation or body in supporting or representing the relevant group(s) between January 2020 and Spring 2022 as it relates to the response to Covid-19 of (a) the UK Government; (b) the Scottish Government; (c) the Welsh Government; and/or (d) the Northern Ireland Executive.

- i. SWA were one of the leading providers of front-line and advocacy support to those facing gender-based violence in England throughout the pandemic, and certainly between January 2020 to Spring 2022.
- ii. They were amongst a collective of sister organisations who coordinated an emergency non-governmental response to gender-based violence, which emerged as an urgent social issue at the beginning of the pandemic.

Increased demand for existing services

- iii. SWA run 22 refuges, offering 178 rooms for women and children, including a specialist refuge for women with mental health difficulties and substance abuse issues. They run a number of specialist housing and support projects for particular groups of survivors including women who have experienced severe and multiple disadvantage including street homelessness; older women; children and young people; young black and ethnic minority women; and Irish travellers. SWA run the East London Advice Line and the North London Rape Crisis Centre. In 2021/22, SWA worked with nearly 30,000 women and children across its services. In 2020/21, SWA supported 10,692 survivors of domestic abuse through advice, advocacy and support, and 920 women and children across their 22 refuges¹. SWA provided 1-1 support to 1,655 callers through our rape crisis helpline and 622 survivors were supported with counselling, advocacy and group work in North London.
- iv. In the period January 2020 to Spring 2022, SWA saw a substantial increase in the level of demand for their services – an 117% increase in calls to their advice line in March 2020 compared to the previous year.
- v. The isolation of lockdown was extremely difficult for many survivors who were no longer in abusive situations but were still managing trauma. Being cut off from their support networks impacted survivors' mental health and women were consequently calling SWA's advice line more frequently and with higher and more complex mental health needs.

¹ [SWA Impact Report 2020](#)

- vi. SWA's Rape Crisis Helpline saw an increase in the complexity of survivors' needs, with the average length of call increasing by 30% between 2019-20 and 2020-21. This was compounded by the closures of their waiting lists for counselling through the Rape Crisis Centre, as the demand for the services was significantly larger than the funding that was provided for the service. Despite increasing the waiting list to 18 months during the pandemic, SWA had to close the waiting list from March 2020 until September 2020 and has fluctuated opening and closing the list ever since.

National advocacy and additional services offered during the pandemic

- vii. In addition to expanding their service to protect and support survivors of abuse as far as possible, SWA engaged with and/or initiated the following.
- viii. First, SWA along with many other specialist Violence Against Women and Girls ("VAWG") 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.² SWA took steps to initiate a legal challenge, along with Southall Black Sisters, during the first lockdown to demand that urgent action was taken for survivors of domestic abuse. This resulted in £76 million of additional ring-fenced funding to support survivors of domestic abuse and introduced an early implementation of the automatic priority need criterion contained within the Domestic Abuse Bill.
- ix. Second, noting the significant increase in women reaching out for advice, SWA secured additional funding from the Ministry of Justice to increase capacity of the East and West London advice line, and for advice casework within the Ascent Advice Plus project.
- x. Third, SWA and Southall Black Sisters 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 their time at the project, SWA offered women therapeutic support, assistance from specialist refuge workers and resettlement support. This project allowed much needed increased capacity at a time where refuges were not seeing women move on and therefore new spaces becoming available and a lack of responses from some statutory agencies. The project provided

² <https://www.solacewomensaid.org/news/urgent-action-must-be-taken-ensure-survivors-safety-amidst-covid-19>

accommodation and wrap around support to 205 women from May 2020 to September 2021 including 73 with NRPF.

- xi. Fourth, in April 2020, SWA developed a series of training for professionals who supported domestic abuse survivors to help them with assessing risk, safety planning and supporting survivors to flee during the pandemic.
- xii. In addition, SWA:
 - Joined with sector colleagues to highlight the steps individual government departments should take to support domestic abuse survivors during the covid-19 restrictions in April 2020³.
 - Joined with sector colleagues to highlight the ongoing risk to domestic abuse survivors as restrictions were lifted in July 2020 and to call on the Government to ensure there was further funding following the cliff-edge of the initial Government funding⁴;
 - Published a report in March 2021 on the impact of the pandemic on access to safe and affordable housing for domestic abuse survivors⁵;
 - Undertook research with Justice Studio and the University of Greenwich to look at the impact of the first 6 months of the pandemic on domestic abuse survivors and published a report with recommendations on what government and authorities needed to do to support their recovery and ensure that SWA would be prepared for any future pandemics⁶;
 - Raised the need for the Government's new VAWG strategy 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 pandemic⁷; and
 - 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 period⁸.
 - Created a Covid-19 business continuity plan⁹ which was widely distributed in the sector and in other support organisations. This included it being adopted by London Councils who started distributing it – demonstrating that proactive decision-making was coming from SWA/the sector as opposed to the government. This document had to be updated 49 times during the pandemic.

³ <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/2020/04/An-open-letter-to-the-prime-minister.pdf>

⁴ <https://www.solacewomensaid.org/news/easing-coronavirus-restrictions-joint-statement-vawg-sector-organisations>

⁵ https://www.solacewomensaid.org/sites/default/files/solace_vawghousing_final_resup10125-compressed_1.pdf

⁶ <https://www.solacewomensaid.org/get-informed/professional-resources/solace-and-justice-studio-report-covid-19-lockdown-and-domestic>

⁷ <https://www.solacewomensaid.org/get-informed/professional-resources/solace-and-justice-studio-report-covid-19-lockdown-and-domestic>

⁸ <https://www.solacewomensaid.org/news/solace-calls-womens-health-strategy-include-vawg>

⁹ [Business Continuity Plan March 2020](#)

- o Responded to Select Committee inquiries on the preparedness and response of Government to Covid-19.

4. A list of any articles or reports the organisation or body has published or contributed to, and/or evidence it has given (for example to Parliamentary Select Committees) regarding the impact on the group(s) which the organisation or body supports or represents of the response to Covid-19 by (a) the UK Government; (b) the Scottish Government; (c) the Welsh Government; and/or (d) the Northern Ireland Executive. Please include links to those documents where possible.

- i. During the pandemic, SWA were active in publishing articles, writing to Government, contributing to reports and publications and participating in legal challenges. Listed here:
 - a. [Pre Action Protocol letter, on behalf of SBS and Solace Women's Aid regarding Covid-19 – Measures Urgently Required to Protect and Support Domestic Abuse Survivors, dated 31st March 2020](#)
 - b. [Joint letter to the Prime Minister from VAWG sector organisations including recommendations for individual departments, dated 3 April 2020](#) (a response was not received from a minister until October 2020)
 - c. [Easing of Coronavirus Restrictions: Joint Statement from VAWG sector organisations, dated 8 July 2020](#)
 - d. [Violence against women and girls, housing and homelessness: A joined up strategy report](#)
 - e. [Solace and Justice Studio report on Covid-19 lockdown and domestic abuse](#)
 - f. [Written evidence to the Home Affairs Select Committee on Home Office preparedness for Covid-19](#)
 - g. [Written evidence to the Public Accounts Select Committee on Covid-19: Housing for Rough Sleepers](#)
 - h. [Written evidence to the Joint Committee on Human Rights Committee on The Government's response to covid-19: human rights implications](#)
 - i. [The Government's 2021-24 VAWG strategy must respond to the scale and impact of the parallel pandemic of VAWG – written submissions to the Home Office for new cross-Government VAWG strategy 2021-2024.](#)
 - j. [Solace calls for Women's Health Strategy to include VAWG -written submissions to the Department of Health and Social Care in response to their call for evidence for a Women's Health Strategy.](#)

k. SWA business continuity plan, dated March 2020¹⁰

SWA are aware that the designate Domestic Abuse Commissioner was also in regular meetings with the domestic abuse sector during this period and will have had meetings and correspondence with the UK Government on the response to the pandemic.

5. The view of the organisation or body as to whether the group(s) it supports or represents was adequately considered when decisions about the response to Covid-19 were made by (a) the UK Government; (b) the Scottish Government; (c) the Welsh Government; and/or (d) the Northern Ireland Executive. Please also explain the reasons for the view expressed by the organisation or body in this respect.

- i. 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. SWA's application for Module 2 Core Participant status stems from this belief.
- ii. SWA await disclosure of materials in Module 2 which they hope will help shed a light on whether those they support were considered in government decision making. In anticipation of this, SWA's current position derives from the following frontline experience.

a) A lack of consultation with SWA (and other violence against women and girls organisations) at the beginning of the pandemic, when determining measures to contain the virus.

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 meetings did begin from April 2020. SWA believe the result of this was a lack of planning, preparation and funding by Government to deal with the foreseeable consequences of locking-down women in homes with their perpetrators. As the UK Cabinet were 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.¹¹ Stark statistics were also coming from France. On 28th 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 17th. In

¹⁰ See footnote 9

¹¹ <https://www.theguardian.com/society/2020/mar/28/lockdowns-world-rise-domestic-violence>

Paris alone, cases were up by 36%.¹² Yet, the Government seemingly ignored international experience as well as domestic expertise when decision making.

The lack of consultation with expert frontline organisations in Domestic Abuse was apparent in public messaging instructing the nation to lockdown – there was a distinct failure to have any nuance or information for those women who were suddenly in increased danger due to lockdown. Were these women allowed to leave the home if they were in danger? Were public authorities such as police aware of these issues when they were implementing lockdowns in communities? In absence of this SWA along with other VAWG groups wrote to the government on 3rd 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.”¹³ Subsequently, the government announced a public campaign highlighting domestic abuse, under the hashtag #YouAreNotAlone, on 11th April 2020.¹⁴ SWA are unsure the extent to which translations were made available. 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.

We are unsure how much consultation was undertaken at this time with the Victim’s Commissioner and Domestic Abuse Commissioner. Considering the decisions of Government, we believe consultation was limited and not acted upon.

b) 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.

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*¹⁵. Yet, the Government failed to provide emergency funding to SWA and others in the sector until 2nd May 2020, following the threat of a legal challenge by SWA and Southall Black Sisters. 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.

¹² <https://www.euronews.com/my-europe/2020/03/28/domestic-violence-cases-jump-30-during-lockdown-in-france>

¹³ [Open letter Re: Covid-19 pandemic and preventing and responding to an increase in VAWG – 3 April 2020](#)

¹⁴ <https://www.gov.uk/government/news/home-secretary-announces-support-for-domestic-abuse-victims>

¹⁵ <https://www.theguardian.com/society/2020/mar/26/warning-over-rise-in-uk-domestic-abuse-cases-linked-to-coronavirus>

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

SWA believe that the Government did not consider in their decision making the complex needs of trans women and non-binary women throughout the period in question.

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 month's benefit to relieve their acute hardship.¹⁶

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 only applies to those on partner 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-partner visas. At the very least, SWA believe the DVR should have been extended to all visa types during the pandemic.

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 Authority.¹⁷

c) Lack of consideration given to those living in domestic violence refuges

Around March 2020 the Government published guidance for refuges during the pandemic.¹⁸ 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 in Copthorne. 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

¹⁶ [Local Authority Responses to people with NRPF during the Pandemic – Research Report, August 2020](#)

¹⁷ [LGA responds to Crisis report on preventing 60,000 people from becoming homeless in England, 22 December 2020](#)

¹⁸ [COVID-19: guidance on isolation for domestic abuse safe-accommodation settings](#)

services for people experiencing homelessness and rough sleeping was updated.¹⁹ This points to a lack of adequate consideration of this group living in overcrowded and cramped conditions.

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 gain clarity on whether they were eligible for testing and vaccinations in line with health and social care staff.

When lateral flow testing (LFT) became available SWA 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 inconsistency approach across SWA's London services which is likely to be replicated in other parts of the country.

Vaccination status was later clarified by NHS England in a letter to homelessness services on 2 February 2021 however this was following advocacy from organisations at a national and local level.

d) Lack of consideration of the impact on women experiencing abuse being able to access local authority departments due to slowing down of services

During lockdown, the women SWA support experienced difficulties in contacting local authority departments for support, such as homelessness departments and child social care. We submit 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.

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

During lockdown, SWA saw an increase in women contacting them for support, and that those contacting them had extremely complex needs and presented in more unsafe and urgent situations than SWA would normally experience. This required increased levels of support and led to SWA's frontline team facing increased pressures and longer working hours to meet the needs of the women contacting them.

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 like SWA 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. Whilst additional funds were provided

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

by Government they did not match the increased need and it took four months and the creation of four different complex funding streams to deliver emergency funding to frontline VAWG services. This funding often took longer to get to frontline organisations to allow them to increase their capacity.

SWA and other specialist organisations employ nearly all women to deliver their services 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.

- iii. The experience of SWA of government decision making from January 2020 to Spring 2022 was so unsatisfactory as to point to non-compliance with Public Sector Equality Duties.

6. Whether the organisation or body raised any concerns about the consideration being given to the group(s) which it supports or represents with (a) the UK Government; (b) the Scottish Government; (c) the Welsh Government; and/or (d) the Northern Ireland Executive, when the Government(s) and/or Executive were making decisions about their response to Covid-19. Please provide a list of any such correspondence or meetings with the UK Government, Scottish Government, Welsh Government and/or the Northern Ireland Executive, including the dates on which the body or organisation wrote or such meetings were held, to whom the correspondence was addressed or with whom the meeting was held, and any response received from the UK Government, Scottish Government, Welsh Government and/or Northern Ireland Executive addressing such concerns.

- i. As detailed above, SWA raised concerns directly to the UK Government as follows:

a) Letter regarding Covid-19 – Measures Urgently Required to Protect and Support Domestic Abuse Survivors, dated 31st March 2020²⁰

Issued to (then) Robert Jenrick Secretary of State for Housing, Communities and Local Government, on behalf of SWA and signed by 58 other groups and individuals including.

b) Open letter regarding Covid-19 pandemic and preventing and responding to an increase in violence against women and girls, dated 3rd April 2020

Issued to (then) Prime Minister Rt Hon Boris Johnson MP, cc'ing Chancellor of the Exchequer, Home Secretary, Secretary of State for Housing, Communities and Local Government, Secretary of State for Justice, Secretary of State for Work and Pensions, Secretary of State for Health and Social Care, Secretary of State for Education, Minister for the Cabinet Office.

²⁰ See Pt 4(i)(a)

Issued by 21 organisations tackling VAWG, including SWA.

Response received in October 2020 from Home Office Minister.

- c) Pre-Action letter to Secretary of State for Housing, Communities and Local Government, 27 April 2020 and follow up pre-action letter to the same, dated 1 May 2020**

Sent to Secretary of State for Housing, Communities and Local Government, by Public Interest Law Centre on behalf of SWA and Southall Black Sisters.

Response received on 12 May 2020

- d) Written evidence to the Home Affairs Select Committee on Home Office preparedness for Covid-19, dated February 2021**

Submitted to Home Affairs Select Committee, by SWA.

- e) Written evidence to the Public Accounts Committee Inquiry - Covid-19: Housing rough sleepers, dated 25 January 2021**

Submitted to the Public Accounts Committee Inquiry, by SWA.

- f) Submission of written evidence to the Home Office's call for evidence for its (then) new cross-Government violence against women and girls strategy 2021-24, 19 February 2021.**

Submitted to Home Office, by SWA.

- g) Meeting with Westminster Local Authority, February 2020**

SWA's deputy director of service quality and excellence, alongside other agencies, attended this meeting on pandemic planning, to think of creative ideas in the event of different scenarios in the pandemic. At this meeting there were civil servants present noting down what was being said. The idea which later became the "everybody in" scheme was believed to have originated from these discussions. SWA's deputy director of service quality and excellence recalls the focus of that meeting was heavily focussed around homelessness and not VAWG. They note that they weren't invited to group meetings like this to consider VAWG during the pandemic.

This meeting with the local authority in Westminster highlights differences between conversations which were happening at a local level vs a national level. This led to a lack of uniformity in messaging around this issue across the country.

7. A brief summary of the views of the organisation or body as to any lessons, if any, that can be learned from any consideration which was given to the group(s) that the organisation or body supports or represents by (a) the UK Government; (b) the Scottish Government; (c) the Welsh Government; and/or (d) the Northern Ireland Executive when they were making decisions about their response to Covid-19.

i. SWA believes the UK Government can learn lessons to ensure that those they support will be properly considered in key decision-making in the event of a future pandemic.

ii. Detailed below are some initial lessons SWA submits the UK Government can learn, however they expect these views to become more refined during the course of their involvement in Module 2. Therefore SWA would welcome the opportunity to submit a Witness Statement to the Inquiry to develop these observations.

a) Consultation with expert organisations from the beginning of the pandemic.

National frontline organisations like SWA, other organisations and individual experts in Domestic Abuse, must be involved in decision-making processes if those decisions are likely to impact those they support. Government plans must be scrutinised for any impact on domestic abuse prior to implementation. This would reduce the likelihood of omissions in decision-making from Government, and would help Government mitigate any harmful impacts of, for example, lockdowns.

This co-operation would enable innovative thinking to protect survivors of Domestic Abuse. Not only would this benefit central Government decision-making, but the decision-making in local authorities, and public bodies such as the police. This would, for example, ensure that any regulations introduced in future lockdowns would include exemptions for survivors which were sufficiently clear for authorities and communicated with survivors.

The survivors SWA supports tend to have overlapping-issues. Therefore consultation with organisations supporting Domestic Abuse survivors should come hand-in-hand with consulting other experts in the fields of migrant rights, black and ethnic minority rights and housing, to name but a few.

Prior to the Covid-19 pandemic, it would have been good practice to consult SWA and others in the Domestic Abuse sector on national plans for a pandemic. Now the Government has the opportunity to consult with SWA to learn lessons for the handling of any future pandemic – we hope this opportunity will be used to its fullest.

b) Monitoring, working with and learning from the international community during a pandemic.

There were a number of countries experiencing wide-spread virus transmission prior to the UK. China, Germany and Italy to name but a few. There was a documented rise of domestic abuse in these countries²¹, meaning a rise in the UK was predictable. Yet, there appeared to be little or no reflection on these developments in other countries. Nor does there appear to have been any communication with those countries to determine if they could work together to solve this shared issue.

Strong ties and communication with the International community should have continued throughout government decision-making in the pandemic. This would have benefitted those who

²¹ <https://www.theguardian.com/society/2020/mar/28/lockdowns-world-rise-domestic-violence>

SWA support e.g. by learning from countries who had locked down earlier and were taking steps to protect survivors.

SWA argues that, should there be a future pandemic, analysis and greater communication with the international community would benefit government decision-making, and those they support.

c) Ensuring decision-making is lawful e.g. Public Sector Equality Duties (“PSED”)

SWA appreciates that the Government had to make many significant decisions in a short period of time, certainly at the beginning of the pandemic. This does not however reduce the obligation to adhere to PSED and the Equality Act 2010. We anticipate that Module 2 will reveal these were not adhered to at all times. If that is the case, and in order to ensure that this is not repeated in the event of a future pandemic, SWA’s position is that an expert in PSED should be brought on-board to scrutinise decision-making from Cabinet during crucial periods of the pandemic.

d) Allocation of extra resources to frontline organisations, public services and local authorities in-line with government decision making.

SWA wish to point out that there was the need for extra resourcing both within their organisation and externally during the pandemic. This need arose from the pandemic, but also from government decision-making, particularly in failing to address the predicted rise in domestic abuse. Yet, the government did not provide extra resources and funding to the organisation at a time when they relied on the continuation and increase of their vital services. In the future, funds should be made available to frontline organisations at the beginning of a pandemic, to allow them to quickly expand services in a crisis.

SWA deal with local authorities and public services on a daily basis through their casework. It is as a result of this experience that they say, there must be an increase in funding for local authorities & other public services, if survivors are to be properly considered. The pandemic arrived after a long period of reducing public services’ and local authorities’ resources. Prior to the pandemic, survivors supported by SWA routinely struggled to access safe and secure housing. Survivors struggled to access immigration services, faced challenges in getting support from the police and accessing the justice system in a timely manner. There was a chronic lack of therapeutic and mental health services. Those existing issues do not appear to have been considered in government decision-making leading to an escalation of these issues during the pandemic. Ensuring that these vital services are properly funded would allow them to not only expand services when demand increases, but to be able to maintain services at their normative level during lockdowns.

e) Ensuring that survivors living in overcrowded and cramped accommodation are adequately considered in the event of a future pandemic.

As we have already documented²² survivors living in close proximity to one another in refuges and emergency accommodation were at greater risk of spreading the virus to one another. SWA hope that, in the event of a future pandemic, the government will have special consideration to these

²² See point 5ii(c)

survivors when making decisions, so that overcrowded living conditions can be relieved to reduce the risk of virus transfer. Furthermore, that the administration of moving survivors and their families on from emergency accommodation would be considered, as in practice during January 2020-Spring 2022 this process slowed down. This left families SWA support living in single rooms for up to a year.

f) Urgent action to reduce inequality during a pandemic such as providing public emergency funds to all women (and others) with NRPF and understanding the particular needs of trans women and non-binary survivors.

Migrant women with NRPF suffered particular hardship during the pandemic.²³ SWA believes that if this group of women were adequately considered during government decision-making, that emergency provisions would have been made available to this group.²⁴ Actions like these would have helped alleviate the destitution these women faced during the pandemic.

SWA note that a refuge was set-up for LGBTQI+ persons during the pandemic, including providing refuge space to trans women and non-binary survivors. There was a particularly chronic lack of refuge spaces for this at-risk group, which should be a consideration in the event of decision-making in a future pandemic.

In times ahead, SWA believe the Government should be awake to issues concerning equalities, particularly (for SWA), addressing domestic abuse, the needs of domestic abuse survivors, the needs of migrant women who are subject to NRPF and the particular needs of the LGBTQI+ community. In their future decision-making, Government must use the powers available to them to reduce existing inequalities in times of a national pandemic.

²³ See point 3(vi)

²⁴ See point 5(ii)(b)