Witness Name: Hannana Siddiqui

Statement No.: 1

Exhibits: 50

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UK COVID-19 INQUIRY

WITNESS STATEMENT OF HANNANA SIDDIQUI, SOUTHALL BLACK SISTERS

I, Hannana Siddiqui of 21 Avenue Road, Southall, Middlesex, UB1 3BL will say as follows:-

- 1. I am the Head of Policy, Campaigns and Research of Southall Black Sisters ("SBS"). I have worked at SBS for 36 years and performed all the roles within in it, including frontline advocacy and Joint-Director of SBS. At the time of the pandemic, my focus was policy, research, campaigning and fund-raising work; and although the issue of the pandemic was raised at several policy forums and in casework, I was not directly involved in a managerial capacity on the issue. The former Executive Director and other key operational staff who were more centrally involved during the pandemic no longer work in the organisation. I am an expert on violence against black, minority and migrant women and girls, and have a PhD with over 50 publications on the subject.
- 2. I make this statement in response to the Request for Evidence by the Chair of the UK Covid-19 Inquiry. We sent out a call for evidence to assist the Inquiry and received responses from 12 violence against women and girls (VAWG) organisations. This evidence will be relied on throughout my statement and is referred to as "Response to Call for Evidence" (HS/1). INQ000281059
- 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 harm. 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. My statement will also speak to the disproportionate impact that the pandemic, and the government's response to it, had on those with protected characteristics under the Equality Act 2010 on women and girls, particularly those facing VAWG from black and ethnic minority communities, and migrant women subject to immigration and No Recourse to Public Funds (NRPF) problems.

Brief overview of Southall Black Sisters

- 4. Southall Black Sisters ("SBS") is an internationally renowned not-for-profit organisation which was established in 1979 to meet the needs of black and ethnic minority women. For more than four decades SBS have been at the forefront of challenging domestic abuse and harmful practices such as forced marriage, dowry abuse, honour based abuse (HBA) and other gender-related violence locally and nationally. We have campaigned for the provision of state support in terms of accountable and effective services and legal rights to enable women and their children to escape violent relationships. Whilst SBS' focus is on the needs of black and minority women, it also assists any woman who needs emergency help, many of whom are from working-class and migrant backgrounds.
- 5. SBS' vision is to empower black and ethnic minority women and girls to escape gender based violence and assert their rights to equality, justice and freedom. To this end, SBS were successful in their campaigns in introducing the Domestic Violence Indefinite Leave to Remain (DVILR) and Destitution Domestic Violence Concession (DDVC); as well as many other legal, policy and practice changes, including the Forced Marriage Act 2007 and statutory and best practice guidance on domestic abuse, forced marriage and HBA.
- 6. The legal status of SBS is a limited company registered by guarantee.
- 7. SBS is a leading holistic 'by and for' specialist service led by black and ethnic minority women and runs a national helpline. We bring strategic cases, and provide local advocacy in cases against local and national government, and other bodies. SBS also provide counselling, support groups and educational classes in London,

particularly West London. It also conduct policy work, campaigning, research, professional training, and community educational and developmental work. SBS are currently leading the UK wide partnership project, Support for Migrant Victims (SMV) pilot project funded by the Home Office on domestic abuse and NRPF. SBS runs a unique last resort national No Recourse Fund (NRF) which pays rent and subsistence to women and their children with NRPF for up to 12 weeks; and is also uniquely commissioned by the Government's Forced Marriage Unit (FMU) to help re-settle repatriated victims.

- 8. SBS support primarily black and ethnic minority women, however, they will support any woman or person in need of emergency help. Pre-pandemic, SBS dealt with about 7,700 cases and enquiries every year, which tripled in number by the end of the Covid-19 pandemic. About 60% of SBS's case involve migrant women; and while nearly all suffer domestic abuse, about 70% also experience HBA in that the violence against them is perpetrated by more than one perpetrator and/or motivated by the need to uphold a shared code of family and/or community honour. Many of our clients also experience rape and sexual violence, particularly within the home.
- 9. SBS supports women and children at the intersection of several inequalities, mainly race, sex and class; and issues related to violence against women and girls. This includes helping migrant women with their immigration applications and NRPF problems, women experiencing homelessness and those who have mental health needs. Many women and girls suffer from restrictions and control from a young age and may be subjected to a continuum of abuse throughout their lifetime from child abuse, female genital mutilation (FGM), forced marriage, dowry and economic abuse, domestic abuse/coercive control, sexual violence and HBA. SBS campaigns to end violence against women in the UK, but also in transnational spaces where a victim may be taken overseas to be abused, abandoned or killed. Flowing from this, the women we support are commonly experiencing both physical and mental health issues. SBS support for these women is extended to their children and family, to relieve them all from the hardship they face at the hands of the perpetrator/s.

10. SBS were granted core participant (CP) status on 13 October 2022 and granted funding for legal representation. In granting Core Participant status, the Chair observed:

"I consider that Solace Women's Aid and Southall Black Sisters jointly, are 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".

- 11. During the pandemic, SBS and Solace Women's Aid ("SWA") 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 (as exhibited by Rebecca Goshawk at RG/1). ¹ This project was funded by the Mayor of London (through the Mayor's Office for Policing and Crime "MOPAC"). It provided a much needed increased capacity at a time where refuges were not seeing women move on and therefore new spaces were not becoming available. It was particularly important given there was a lack of response from central government and local councils. The project provided accommodation and support to 205 women from May 2020 to September 2021 including 73 with NRPF (with a short extension for resettlement purposes up to Nov 2021, which may have been funded by central Government).
- 12. SBS now aim to prevent or mitigate any on-going harm caused by the Covid-19 pandemic (January 2020- February 2022) and to prevent or reduce the impact of any future public health crisis and the related social 'shadow' or 'dual' pandemic of domestic abuse and VAWG.
- 13. In summary, the evidence that we wish to draw attention is as follows:
 - That the government failed to anticipate, or plan for, the well-documented increase in domestic abuse in periods of crisis generally, and particularly as a result of lockdown (see paras 101 – 104);

¹ See <u>Southall Black Sisters and Solace launch COVID-19 Crisis Project to create urgently needed safe housing - Voice Online (voice-online.co.uk) | RG/1 - INQ000281059 |</u>

- ii. That the government failed to consult ourselves, and/or other organisations in the VAWG sector (see paras 125-125);
- iii. That the government failed to fund services responding to the rise in domestic abuse adequately (see paras 147 156);
- iv. That the Government failed to consider pre-existing inequalities and the impact of the hostile environment on migrant and other black and ethnic minority survivors of abuse (see paras 140 – 143);
- v. 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 144 146);
- vi. 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 136 139);
- vii. 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 149 156).
- 14. I have included, at paras 160 167, a summary of actions that the Government ought to have taken which SBS hopes the Chair will recommend, and which we hope Government will consider so that it does not make the same mistakes again.

Context: domestic abuse and services supporting survivors prior to pandemic Domestic Abuse

- 15. The Domestic Abuse Act 2021 (DAA 2021) provides the first statutory definition of domestic abuse which is defined as, where the perpetrator and victim are both aged 16 or older, the behaviour is abusive; and the victim and perpetrator have a relationship that makes them "personally connected".² "Abusive" behaviour is described as:
 - Physical or sexual abuse;
 - ii. Violent or threatening behaviour;
 - iii. Controlling or coercive behaviour;

² Domestic Abuse Act 2021, Part 1 Section 1

- iv. Economic abuse:
- v. Physiological, emotional or other abuse.
- 16. The Act also now allows for children to be seen as the victims of domestic abuse rather than as witnesses if they "see or hear, or experience the effects of, the abuse" (s.3(2) DAA 2021)
- 17. The Domestic Abuse Act 2021 Statutory Guidance (published July 2022) incorporates culturally harmful practices such as forced marriage and HBA in the definition of domestic abuse (HS/2).³
- 18. We support the statutory definition and guidance, but also adopt Women's Aid's definition of domestic abuse which is: "...an incident or pattern of incidents of controlling, coercive, threatening, degrading or violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer. It is very common. In the vast majority of cases it is experienced by women and is perpetrated by men (HS/3)."4
- 19. Migrant women are at a further disadvantage, with perpetrators withholding documents and using their insecure immigration statuses as a further form of abuse. These survivors find it extremely difficult if not impossible to access protection if they experience domestic abuse, and therefore are more likely to remain in abusive homes. Many are blocked from accessing public funds and are turned away from refuges. Many are also worried about reporting the abuse to the police or other services, for fear of being detained or deported (HS/4, HS/5, HS/6).⁵

³ https://www.gov.uk/government/publications/domestic-abuse-act-2021/domestic-abuse-statutory-guidance-accessible-version

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1089015/Domestic Abuse Act 2021 Statutory Guidance.pdf | HS/2 - INQ000281070 |

⁴ See Women's Aid definition here - https://www.womensaid.org.uk/information-support/what-is-domestic-abuse/ HS/3 - INQ000281082

⁵ See report from the Domestic Abuse Commissioner 'Improving pathways to support for migrant victims of domestic abuse' - https://domesticabusecommissioner.uk/wp-content/uploads/2021/10/Safety-Before-Status-Report-2021.pdf; and https://domesticabusecommissioner.uk/wp-content/uploads/2022/12/Safety-before-status-The-Solutions.pdf. Also see SBS report:

https://southallblacksisters.org.uk/app/uploads/2023/05/da-bill-briefing-paper-2.pdf and report on a supercomplaint on problems with data sharing

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945314/s afe-to-share-liberty-southall-black-sisters-super-complaint-policing-immigration-status.pdf.

HS/4 - INQ000281093 HS/5 - INQ000281104 HS/6 - INQ000281107

Domestic abuse services prior to pandemic: impact of austerity

- 20. The detrimental impact of austerity policies and public spending cuts from 2010 onwards has been well reported. Funding for services responding to VAWG reduced dramatically across the UK from both central and local government sources. Simultaneously, public spending cuts to statutory services and social security have increased the demand on the voluntary sector and created additional barriers for many victim-survivors of VAWG, for example increased financial precarity. The move away from local and national grants to competitively tendered-for contracts to deliver services and the short-term nature of many contracts and grants are of further detriment to smaller by and for organisations like SBS.
- 21. As a result of the shortfall in funding, refuges were already unable to cope with current levels of demand prior to the pandemic. For example, in 2018-19, 64% of referrals to refuges in England were declined. Provision of safe alternative accommodation for migrant women was even worse. In the same year, only 5% of refuge vacancies listed could accommodate women with NRPF (HS/7).6 This is precisely why SBS has long had to resort to housing incredibly vulnerable women in B&B accommodation as an emergency measure. The impact of the shortfall of funding has been even worse for women from black and ethnic minority communities and migrant women with insecure immigration status as a result of the lack of ringfenced funding for specialist services (as exhibited by Rebecca Goshawk at RG/28).7 This is one of `the clearest indicators of the government's lack of preparedness for the impact of the Covid-19 pandemic on VAWG. The government has demonstrated time and again its lack of willingness to adequately support services responding to VAWG even in the absence of a national crisis. As such, it follows that the government did not adequately prepare for the necessary funding that would be required to respond to the dramatic increase in VAWG that followed as the Covid-19 pandemic struck.

⁶ Women's Aid (2020) The Domestic Abuse Report 2020: The Annual Audit, Bristol: Women's Aid. Available at: https://www.womensaid.org.uk/the-domestic-abuse-report-2020-the-annual-audit/ (Accessed: 12 September 2023). HS/7 - INQ000281108

⁷ https://domesticabusecommissioner.uk/wp-content/uploads/2022/11/DAC_Mapping-Abuse-Suvivors_Long-Policy-Report Nov2022 FA.pdf RG/28 - INQ000280158

- 22. As the Women Resource Centre points out, if the government had invested in the women's VAWG sector over the last 20 years, rather than chronically underresourcing it, the sector would have been in a much better position to meet the inevitable increased demand being driven by the pressures of lockdown (HS/1).⁸ As the situation stood, many organisations in the London VAWG Consortium reported that they did not have the reserves to maintain salaries and premises for any length of time, adding to the precarity and pressures of these life-saving frontline services.
- 23. The feedback from many VAWG organisations was that, during the pandemic, many statutory organisations that would normally help to support women closed their doors, effectively leaving the lives and safety of women solely in the hands of VAWG organisations. More public services to help women at this time would have been necessary for the sector to have been able to cope better with the increased demand and complexity of cases (HS/1).9 Women's Aid also noted that an existing state of underfunding in the sector, disproportionately so for services supporting Black and minoritised women, disabled and LGBT+ victim-survivors, made services extremely vulnerable to crisis (HS/8).10 The report stated that although "Black and minoritized people have been over exposed and under-protected to the pandemics economic and social consequences", that:

"The literature demonstrates an existing state of underfunding in the sector, disproportionately so for services supporting Black and minoritised women, disabled and LGBT+ victim-survivors. Whilst much of the sector received emergency funding from the Government, there were challenges in applying for this, particularly amongst smaller organisations (HS/8)."11

The Government's 'Hostile Environment' policies and impact on migrant women

⁸ Response to Call for Evidence HS/1 - INQ000281059

⁹ Women Resource Centre, Response to Call for Evidence Hs/1 - INQ000281059

¹⁰ Women's Aid , 'Shadow Pandemic – shining a light on domestic abuse during covid'

https://www.womensaid.org.uk/wp-content/uploads/2021/11/Shadow Pandemic Report FINAL.pdf HS/8 - INQ000281109

11 lbid p.4 HS/8 - INQ000281109

- 24. The collection of immigration policies typically known as the 'hostile environment' create serious barriers to migrant women seeking urgent help from statutory services. These include the NHS Charging Regulations, the Right to Rent policy, NRPF conditions and others. These policies create a state of precarity for migrant women and puts them at greater risk of domestic abuse and isolation, as well as preventing them from seeking urgent assistance. In the context of the Covid-19 pandemic, this also created a substantial public health risk if migrant women are deterred from seeking healthcare and housing support.
- 25. In 2018, Liberty and SBS launched the first ever police Super-Complaint. The Super-Complaint concerned the fact that the police share the data of victims and witnesses of crimes with the Home Office for immigration enforcement purposes. The data-sharing includes all victims, even those who are victims of extremely serious crimes such as rape, modern slavery and human trafficking. Immigration data sharing obligations also apply across several public services including the NHS, schools, housing and emergency services. This policy relates to VAWG as, for instance, healthcare appointments may represent the 'one chance' that migrant women have to speak to a professional and disclose abuse, but too many are deterred from accessing these services due to fear of immigration enforcement. One consequence of immigration surveillance in the NHS is the increased likelihood of migrant women being trapped in abuse because a key route to reporting that abuse - through health services - is not available to them. This undermines the fight against crime as it has a real deterrent effect on people with insecure immigration status seeking the support of the police. As a result, victims are unable to access justice while perpetrators remain free to commit further crimes and threaten public safety.

Domestic Abuse Act 2021 (DAA 2021)

26. On 29 April 2021, the Domestic Abuse Bill received Royal Assent. Three amendments were put forward to offer vital protection for migrant women, led by

SBS, the Latin American Women's Rights Service (LAWRS) and the End Violence Against Women coalition (EVAW) (HS/9).12 These were:

- i. To ensure all survivors of domestic abuse can equally access support, welfare systems and legal tools that provide protection from abuse, regardless of immigration status. This would have confronted the existing two-tier system of safety that exists for migrant and BME women, and strengthen the legislative framework that requires public authorities to effectively respond to all victims of domestic abuse.
- ii. Include a provision establishing safe reporting mechanisms for survivors accessing vital public services, so they can safely report abuse to the police, social services, health professionals and others, with confidence that they will be treated first and foremost as victims and without fear of immigration enforcement.
- iii. Extend eligibility for the existing DVILR and DDVC to all migrant women experiencing or at risk of abuse. The DVILR and DDVC combined are an effective model of protection; a life-saving mechanism that removes survivors' dependency on their perpetrator(s) for their stay and their survival. However, it is only available to those on spousal or partner visas. We believe that all survivors – whether on student visas, working visas, domestic workers, dependents of others, undocumented or others should also be able to access routes to regularise their immigration status, independent of their perpetrator, and to access public funds at the point of need in order to escape abuse (HS/6, HS/10).¹³
- 27. Had these amendments been accepted, they would have put a decisive end to the two-tier discriminatory system of support that exists for victims of abuse in the UK; a system which determines whether or not a woman deserves safety and security based on her immigration status. Had these amendments been accepted, they would have also ended the climate of impunity that exists for perpetrators

¹² DomesticAbuseBill MigrantWomenBriefing.docx.pdf (endviolenceagainstwomen.org.uk) [HS/9 - INQ000281110]
13 See Briefing Papers 1 and 2 by Southall Black Sisters. HS/6 - INQ000281107 HS/10 - INQ000281060

who harm women without consequence, precisely because of their insecure immigration status (HS/6).¹⁴

- 28. All three amendments were rejected. SBS's amendment to extend eligibility for the DVILR and the DDVC had cross party support, but was rejected by the Government. Instead, under pressure, the Government proposed and subsequently introduced the SMV pilot scheme initially for one year and then extended twice, and is now due to end in March 2025.
- 29. It is egregious that, despite seeing stark evidence about the impact of the pandemic on migrant victim-survivors, and unanimous VAWG sector consensus on the need for provisions for support, the government decided to exclude them from the DAA 2021. Instead, the state had reinforced the weaponization of women's immigration status and NRPF conditions by perpetrators.

No recourse to public funds conditions

- 30. SBS have been leading a thirty-year campaign to reform domestic abuse, immigration and NRPF law. Our campaign resulted in the introduction of the DVILR in 2002 which allows victims on spousal/partner visas under the five year probationary period the right to remain indefinitely in the UK, and the DDVC in 2012, which gives those with NRPF rights to benefits and housing from the local authority under homelessness duties while they apply to regularise their status under the DVILR.
- 31. A substantial proportion of persons with NRPF are single women or women with dependent children. Between 2013 and 2015, over 50,000 individuals with dependents were granted leave to remain in the UK with the NRPF condition attached (HS/11).¹⁵ The Domestic Abuse Commissoner estimated that there are 32,000 victims of domestic abuse who are NRPF. Of these only a small proportion

¹⁴ https://southallblacksisters.org.uk/app/uploads/2021/01/da-bill-briefing-paper-2.pdf HS/6 - INQ000281107

¹⁵ https://www.childrenssociety.org.uk/sites/default/files/2020-11/a-lifeline-for-all-report.pdf HS/11 - INQ000281061

would seek refuge (HS/5).16 As noted in detail below, the refusal of the government to suspend the NRPF condition and the 'hostile environment' immigration policies impacted on the most vulnerable women and children creating not only a public health crisis but also heightening the risk of abuse for vulnerable migrant women and children during the pandemic.

- 32. The situation before the pandemic was dire for women with NRPF. The annual report from Women's Aid shows that only 5.8% of refuge vacancies in 2017-18 would even consider a woman who had NRPF and in some cases this was conditional on her having funding in place to cover her stay (HS/12).¹⁷ Earlier, the Women's Aid 'No Woman Turned Away' (NWTA) project showed that in the first seven months of 2016, over a quarter of women supported had NRPF and of these, 75% were not eligible for the DDVC, and 17% remained where they were living, suggesting they may have been forced to stay in abusive situations. In addition, SBS report assisting almost 300 women (January 2009 to end of December 2016) through its NRF, which was set up in 2009. Between April 2015 and March 2016, SBS dealt with 66 cases, 67% of which were women on non-spousal visas unable to access any support other than from the SBS NRF for a short period (HS/13).18
- 33. A Tampon Tax Fund funded pilot run by SBS for the period 2017-19 supported 78 women and 32 children. Only 29 women were on a spousal/partner visa (although five had been abandoned or had their visa revoked), while 49 (63%) women were non-spousal/partner visas or undocumented, who could not access the DDVC. Single women also could not access help from social services, and those with children found it difficult to obtain a helpful response (HS/13).¹⁹
- 34. The disproportionate impact of violence and abuse on migrant women resulting from the intersectionality of their oppression amplifies both the ways in which violence is experienced and the barriers to accessing support and justice. Women

¹⁶ https://domesticabusecommissioner.uk/wp-content/uploads/2022/12/Safety-before-status-The-Solutions.pdf HS/5 - INQ000281104

¹⁷ https://www.womensaid.org.uk/wp-content/uploads/2019/12/Economics-of-Abuse-Report-2019.pdf HS/12 - INQ000281062

¹⁸ Cited in https://southallblacksisters.org.uk/app/uploads/2023/01/safe-secure-report.pdf ¹⁹ ibid HS/13 - INQ000281063

with insecure immigration status and NRPF find that control of immigration status takes precedence over their rights as victims of VAWG within the 'hostile environment', and statutory and other support services frequently fail to provide the type of help they require. They are often treated first as immigration offenders and then, if at all, as victims. Consequently, they are left with a stark choice to either remain trapped in abusive contexts or face the threat of destitution, detention and/or deportation and are exposed to further economic and sexual exploitation (HS/13).²⁰

Pandemic and Lockdown

An increase in the intensity of gender based violence

- 35. There was also an increase in the intensity of domestic abuse during lockdown. The increase in the scale and extent of domestic abuse and violence against women during the first lockdown was widely reported. All of the organisations that responded to our call for evidence noted a dramatic increase in the intensity of abuse (HS/1).²¹
- 36. For example, Birmingham and Solihull Women's Aid (BSWA) explains that their service users underwent a significant increase in frequency and intensity of domestic abuse including the use of weapons especially knives. Moreover, sexual, physical, emotional and financial abuse intensified. Self-isolation restrictions and lockdown compounded women's depression, anxiety, and sense of loss. They further note that the crisis plunged women into financial insecurity, further trapping them in abusive situations, and limiting their options in terms of their housing (HS/1).²²
- 37. The Domestic Homicide, Suicide and Honour Killing Timelines shows the stages of escalation which can lead to death in an abusive relationship. This research was published in 2022, but commissioned by the Home Office in 2020/21 round of

²⁰ https://southallblacksisters.org.uk/app/uploads/2023/01/safe-secure-report.pdf Hs/13 - INQ000281063

²¹ See response to call for evidence. HS/1 - INQ000281059

²² Ibid HS/1 - INQ000281059

funding (HS/14).²³ Even before publication, early data should have been used to informed the Government's response during the pandemic (including the leadup to lockdown) on how factors like social isolation, depression and high risk abuse such like HBA can contribute to escalation of VAWG and risk of death. Indeed, Jane Monckton Smith also published research paper on the Domestic Homicide Timeline in 2019 would have given them some of these warning signs before the pandemic (HS/15).²⁴

This research supports other research or data that suggest the rates of domestic 38. homicide, suicide and honour killings may be disproportionately high among BME women facing abuse. When compared to women and girls generally, BME women face disproportionately higher levels of domestic homicide (HS/16).²⁵ There are an estimated 12 so called 'honour killings' per year, and Asian women are three times more likely to commit domestic abuse related suicide; and self-harm and suicide ideation also extend to BME women more generally (HS/17, HS/18). 2627 Indeed, domestic homicide increased disproportionately among BME women during the Covid-19 pandemic, representing 24% in total for the 12 month period ending 2021, which is higher than the previous 15-year domestic homicides average, than the 2019-20 domestic homicides data and the general population (HS/19).²⁸ Despite growing concerns about black and ethnic minority women and girls, abuse and suicide, and the long-term impact of the pandemic, the Government has not prioritised these issues in its latest national suicide prevention strategy in England - although it has recognised the links to domestic abuse, the strategy does not contain an intersectional approach, applying to the risk of suicide from domestic abuse to women and girls with different protected characteristics, including black

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²³ 10579 Monckton-Smith (2022) Home Office Report.pdf (glos.ac.uk) HS/14 - INQ000281064

²⁴ see https://www.glos.ac.uk/content/the-homicide-timeline/ HS/15 - INQ000281065

²⁵ Mayor of London (2010) *The Way Forward: Taking Action to End Violence against Women and Girls. Final Strategy 2010-13*, London: Mayor of London. [Online]: Available at: https://www.london.gov.uk/sites/default/files/the-way-forward-strategy.pdf HS/16 - INQ000281066

²⁶ Home Affairs Select Committee, *Domestic Violence, Forced Marriage and 'Honour'-Based Violence: Sixth Report of Session 2007-8* Vol. 1, May 2008. HS/17 - INQ000281067

²⁷ Siddiqui, H. and Patel, M. (2010) Safe and Sane: A Model of Intervention on Domestic Violence and Mental Health, Suicide and Self-harm Amongst Black and Minority Ethnic Women, London: Southall Black Sisters Trust. [Online]: Available at:

https://store.southallblacksisters.org.uk/reports/safe-and-sane-report/ HS/18 - INQ000281068

²⁸ EVAW (2022). Violence against women and girls snapshot report 2021-22 contents. [Online] Available at: https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/EVAW-snapshot-report-FINAL-030322.pdf. | HS/19 - INQ000281069 |

and ethnic minority and migrant women, who in previous research have shown higher risks (HS/20) .²⁹

- 39. Also, during the pandemic, I sat as an expert on a panel for three domestic homicide reviews (DHR) involving black and ethnic minority female victims (these were not cases in which SBS were originally involved). In two cases, mentally ill sons had killed their mothers and in the other case, a husband killed his wife. In all three cases, the Covid-19 pandemic had significantly hampered the response of agencies in preventing the deaths, including shortage of staff, remote working, making speedy, but ineffective risk assessments, or no domestic abuse risk assessments and lack of intervention. In four other cases I am working on, which are one domestic homicide/honour killing, one suspected honour killing (while overseas of a British national), one suicide and one suspected suicide (but classed as 'accident' by a Coroner without the full history of domestic abuse), similar issues would have played a part, but these are subject to further investigation or the DHR process.
- 40. It should also be noted that our experience and research show that domestic abuse and harmful practices such as forced marriage and HBA are also disproportionately higher in or specific to black and ethnic minority communities where there are more barriers to escape; with migrant women facing the greatest obstacles and consequently risks of abuse (HS/21, HS/22).³⁰ Increased isolation during the pandemic suggested that non-spousal/partner visa and undocumented migrant women, and young black and minority women and girls found it even harder to escape. Despite this, and as reported in the House of Commons Women and Equalities Committee report 'So-called honour based abuse' (2023), "...over the last decade these services have been reduced across the UK, and that central and local government tendering processes tend to favour large generic providers (HS/22)."³¹

²⁹ See https://www.gov.uk/government/publications/suicide-prevention-strategy-for-england-2023-to-2028/suicide-prevention-in-england-5-year-cross-sector-strategy. HS/20 - INQ000281071

³⁰ See Sisters for Change (2017) Inequal Regard, Unequal Protection: https://www.sistersforchange.org.uk/2017/11/20/unequal-regard-unequal-protection/ Also see Women's and Equalities report 2023 on HBA: see HS/21 - INQ000281072 HS/22 - INQ000281098 https://publications.parliament.uk/pa/cm5803/cmselect/cmwomeq/831/report.html

³¹ https://publications.parliament.uk/pa/cm5803/cmselect/cmwomeq/831/report.html#heading-0 HS/22 - INQ000281073

- 41. Research by the Rights Lab at the University of Nottingham drawing on data from Karma Nirvana (KN), the Forced Marriage Unit (FMU), Ministry of Justice and other public data archives, found that: 'Following the introduction of the "stay at home" guidance in March 2020, calls to national Forced Marriage helplines substantially decreased. However, they then decreased further in subsequent lockdowns. There is little evidence that one specific Covid-19 related restriction caused this suppression, but we find it was the overall effect of the pandemic and restrictions.' The report further states: 'The data suggests that the increased risks of FM [forced marriage] created by Covid-19 and Covid-related restrictions were moresignificantly experienced by children. Indeed, we are concerned that children were increasingly invisible in the pandemic.' On Forced Marriage Protection Orders (FMPO) in this period, the report says: 'Relatedly, FMPOs were affected by the pandemic, but different age groups were affected in different ways. Orders granted to those under 18 fell dramatically before increasing again in late 2020. Orders granted to adults, however, have shown a consistent decline since restrictions were introduced.'(HS/23) 32
- 42. Karma Nirvana had also complained to Pauline Latham MP and to the domestic Abuse Commissioner, who sent the complaints to Home Office officials. Karma Nirvana were concerned that, although there had been an increase in calls to the National Domestic Abuse Helpline, their own helpline (specializing in forced marriage & HBA) had seen a decrease in calls, and that more needed to be done to raise awareness of support available (Relativity 53220, briefing to Minister for Safeguarding for conference call with MPs on 30 April 2020; it should be noted that the Home Office recorded that Karma Nirvana had separately said that calls to the helpline had increased).

Demand for VAWG support services during the pandemic

³² https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2022/may/the-impact-of-covid-19-and-covid-related-restrictions-on-forced-marriage.pdf [HS/23 - INQ000281074]

- 43. Demand for VAWG support services increased as did the nature and intensity of the abuse.
- 44. SBS' calls and referrals were higher in number. Clients had fewer opportunities to contact any Domestic Abuse agency, and by the time they did contact SBS, it had become an urgent/emergency call as SBS treats all calls by the 'one chance' rule. 'One chance' rule means that agencies must act on the first sign or report to protect victims and prevent escalation. While many other centres were closed, SBS was still open for any walk-ins, and emergencies, so that helped women stay somewhere while they were being assisted to escape. Calls regarding physical, and sexual abuse and assault had also increased, and many women reported increased monitoring and coercive control. SBS's caseworkers were completely inundated as a result of the increased calls.
- 45. In the wake of Covid-19, SBS adapted and expanded its work to respond to emerging and urgent needs of the women they support. In April 2020, the organisation saw a 62% rise in referrals to their service from a single borough compared to the same period in the previous year, as well as a 17% increase in new visitors to their website, compared to the same period in 2019. They continued to provide frontline advice services to thousands via their telephone advice line. Enquires increased by 46% in April 2020 March 2021 when compared to the same period the year before, while cases rose by 40%. The greatest rise in enquiries was in April-June 2020, which was 138%. For the period April 2021 to end of March 2022, cases and enquiries had tripled to 24,588 compared to 7,469 in April 2019-March 2020.
- 46. The increase was most acute among migrant women with NRPF. Due to the lockdown, women's refuges were over-subscribed and social services were harder to access. The Home Office was also taking longer to make decisions on immigration applications and the DDVC. Therefore, more migrant women with NRPF were homeless or trapped in abusive relationships for longer. There was also an overall higher demand for those on spousal/partner visas in the Home Office SMV pilot project in the second year of the pandemic (when it was established) when compared with those on non-spousal/partner visas or

undocumented women in a previous pre-pandemic (2017-19) pilot scheme funded by the Tampon Tax Fund (HS/24, HS/13).33 This meant that the latter group had become more isolated and therefore more vulnerable and at greater risk of violence and destitution.

- 47. This increased demand was a pattern amongst the VAWG sector. A few of the responses to our call for evidence:
 - i. Refuge's National Domestic Abuse Helpline saw activity on the Helpline increase over the first national lockdown - between April and June of 2020 the average number calls and contacts logged on our database every month was 65% higher compared to the previous three months.
 - ii. Visits to the National Domestic Abuse Helpline website increased from approximately 10,500 visits per month in the first three months of 2020, to an average of 73,595 per month between April 2020 – February 2021 a seven-fold increase.
 - iii. BSWA's helpline was ringing constantly. Demand rose by 29%, but some days up to 120%. Isolation measures, lockdown and school closures, meant women lost their 'window of opportunity' to seek help.
 - iv. Referrals for high-risk women doubled at BSWA's Women's Home Options Hub. BSWA received calls from women in temporary accommodation who were struggling with using the shared facilities around social distancing, and were really anxious about their vulnerability.
- 48. Women's Resource Centre explain that demand for VAWG related services increased massively. 11% of survey respondents reported an increase in demand of up to 10%. 19% reported an increase of 20-30%. 30% reported an increase of

³³ See page 9 of report, 'Living at the Edge', here

https://southallblacksisters.org.uk/app/uploads/2023/08/final-cwasu-evaluation-of-the-support-for-migrantvictims-programme-12th-june-2023.pdf. The previous Tampon Tax Fund funded pilot evaluation report, 'Safe and Secure', is here: https://southallblacksisters.org.uk/app/uploads/2023/01/safe-secure-report.pdf HS/24 - INQ000281076 HS/13 - INQ000281063

30-50%. 32% reported an increase of 50-100%. And 8% reported an increase of over 100%. These figures are stark and show the wave of need was unprecedented:

- i. Black and minoritised women's organisations reported a much higher increase in demand for their services since the last survey we conducted in 2020, from 61% to 77%. This is also more than the UK average.
- ii. Black and minoritised women's organisations were markedly more in demand (more than a 0.4 weighted increase than non-BME women's organisations) than other organisations in the following areas: emergency basic services, refuge beds, enquiries/signposting and mental health.
- iii. 45% of organisations surveyed told the WRC that they had experienced a 'substantial' or 'critical and urgent' need for refuge beds.
- iv. 66% of organisations reported a 'substantial' or 'critical and urgent' need for DV [domestic violence] support.
- v. 48% of organisations reported a 'substantial' or 'critical and urgent' need for SV [sexual violence] support.
- vi. Mental health support was by far the largest unmet need during the pandemic. When asked what was driving this increase, 22% of organisations named 'violence' as the key driver.
- vii. Demand for NRPF services increased greatly too. 21% of survey respondents reported an increase in demand of up to 10%. 12% reported an increase of 20-30%. 24% reported an increase of 30-50%. 30% reported an increase of 50-100%. And 12% reported an increase of over 100% (HS/25).³⁴

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³⁴ Dhami, K. (2021) *The Covid-19 Crisis and The UK Women's Sector: One Year On..., Women's Resource Centre.* Available at: https://www.wrc.org.uk/Handlers/Download.ashx?IDMF=8683fd98-b697-47dc-b387-14ad6e777338 (Accessed: 12 September 2023). HS/25 - INQ000281077

- 49. Imkaan's data at this time showed 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.
 - ii. 25% of by and for bed spaces were unavailable because organisations were not able to move women on to independent housing because of the lack of affordable safe provision.
 - iii. By and for organisations experienced a 300% increase 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. At the onset of the pandemic, by and for organisations were operating with 40% underfunding and two-thirds fewer FTE (full-time equivalent) staff when compared to generic organisations.
 - iv. Many Imkaan members reported a significant increase in approaches by migrant women. Some groups noted a doubling of NRPF referrals. At one point, one member noted that 80% of women in their refuge had NRPF. A lack of resources was often instrumentalised to justify discriminatory inaction to further marginalise migrant women.
 - v. Between 40-60% of women in some services had no safe access to phones, phone credit, and no access to the internet. Between destitution and the coercive control women were extremely isolated and cut off from the outside world and opportunities to seek help were compromised (HS/1).³⁵
- 50. The documents that I have seen clearly show the increase in calls to helplines during the pandemic and the significant rise in the first few months from March

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³⁵ Response to call for evidence HS/1 - INQ000281059

2020 through to May 2020. Some, but by not means all, between in late March and early April include: INQ00052778, INQ000052889, INQ000052911, INQ000052927, INQ000052977, INQ000088354 and INQ000053008. What is also clear, is that whilst calls to helplines were increasing, calls to the police during this period were not at the same rate. That, itself, was concerning – victims of domestic abuse ever more fearful about calling the police whilst trapped in their homes with their perpetrators (see INQ000052971, INQ000083616, INQ000053101, INQ000053129 and INQ53220).

- 51. Unlike in some European countries, the large increase in reports to police of domestic abuse incidents didn't happen in England and Wales (see INQ000215582). However as stated above domestic abuse organisations reported very significant increases in contact for help at the start of the COVID-19 pandemic, which has continued.
- 52. On specific forces see for example INQ000099938: Police data shows that over the first lockdown period domestic abuse calls for service to the Met increased by 11.4% (as compared with the same weeks in 2019), an average of 400 additional calls per week. This was almost exclusively driven by an increase in calls from third parties who were not directly witnessing the incident. This can be understood in the context of lockdown, where more people who may not usually be at home would be in close proximity and therefore have greater opportunity to observe and report the abuse. The increase in call demand did not translate into a similar increase in recorded crime. The Met recorded a small increase of 3.5% in offences flagged as domestic abuse-related during the Covid-19 lockdown period (as compared to the same period in 2019)
- 53. The report 'Direct and Indirect Impacts of COVID-19 on Excess Deaths and Morbidity: November 2020 Update, dated 17/12/2020' stated that "Data from the Ministry of Justice suggests that domestic abuse and sexual violence increased throughout the pandemic. On average, between March and June, calls for help via domestic abuse helplines and webchats/online support was 52% higher than compared to pre-COVID-19 levels, with a spike in April that saw the level rise to 85% higher than pre-COVID-19 levels (HS/26)." This follows from the fact that domestic abuse occurred at significantly higher levels during actual lockdown (see

INQ000074959). Further a refuge graph in INQ000185085, charting helpline calls throughout the pandemic. Shows rise from March to May, dip in June, then back up fairly consistent until another dip in Sep-Nov. Nov goes up and dips in December. Also shows a sharp rise in Jan 2021 after second lockdown announced.

54. Furthermore, and again from what I have seen, there is little evidence that the details of the difficulties in accessing refuge space or the pressures on the front line sector as set out above (e.g relating to technical support and funding in the early period), were properly identified or considered by the decision makers. There are numerous broad statements relating to concerns for victims of domestic abuse, and references to the Government's response (its YouAreNotAlone' Campaign and subsequent funding). There are also references to 'consultation' with front line workers (I return to this at paragraph 125 – 135 below) and there are even early references to concerns about refuge accommodation (see Briefing on 18 March 2020 INQ000052640). But, there is little by way of monitoring and understanding of the real needs of victims of domestic abuse – in particular (a) what was really happening on the front line and (b) where were the urgent gaps in the support needed and (c) were the policies implemented being filtered down and making a difference. Within this there is little data, mention or concern for black and ethnic minority or migrant women facing abuse.

Remote Operations and Impact on Staff

55. SBS had to move its entire frontline service to remote working which meant suspending urgent face-to-face contact with those seeking help and assistance. This meant closing SBS' face-to-face reception, advocacy, support group, language, outreach, training and counselling services. Moving to telephone and online services within a week has been financially and practically challenging. It was only in the week commencing 20 April 2020, over 1 month after lockdown was announced, that SBS were finally able to offer weekly outreach advice surgeries online via Facebook messenger or email, for those who could not safely contact us by telephone. All staff, and more importantly users, had needed considerable

additional support during the transition to working from home, which had added a considerable burden on IT and technical resources.

- 56. Whilst SBS was able to operate remotely and were able to conduct casework, this became more complex and intense. As noted at para 11, SBS also had the Covid Crisis project running with SWA (funded by MOPAC), and SBS were able to accommodate migrant victims of abuse via the project. This project was in high demand, and SBS were able to successfully move all the clients on from that project to appropriate accommodation, but this took longer than usual (HS/27).³⁶ The SMV fund also helped SBS assist clients with NRPF, but there was difficulties in placing women in refuges and to pay their rent and subsistence for long enough or high enough as these were below Universal Credit rates, and there were major regional and national variations on availability of services across the UK (HS/28, HS/24).³⁷ Prior to this, SBS calls on Government to underwrite hotel costs to house migrant women were rejected, despite the efforts made by SBS and Compassion in Politics, and some hotel chains to develop suitable proposals.
- 57. This situation had a detrimental impact on staff. Caseworkers worked late hours almost every day, and many times did not have capacity to take on any new cases, but had to due to the workload. Staff working remotely were also isolated from their peers, and although we had regular in-house meetings to keep the spirits up, many times only one or two advocates were able to attend due to the workload and health safety concerns.
- 58. Both the advocacy team and helpline were completely inundated, and many other agencies had also been referring clients to SBS. Casework had to be conducted at lighting speed due to the amount of victims waiting to receive assistance. On top of this, caseworkers also spent considerable amount of time advising other agencies on what their options are with casework when dealing with their victims,

support-for-migrant-victims-programme-12th-june-2023.pdf. HS/28 - INQ000281080 HS/24 - INQ000281076

³⁶ MOPAC – 'The Covid 19 emergency accommodation response for survivors of domestic abuse January 2021' file:///C:/Users/PaulHeron(PILC)/Downloads/pcd_754_covid-

¹⁹ supporting emergency resppone vawg .pdf HS/27 - INQ000281079

37 See two reports on the SMV pilot: https://www.gov.uk/government/publications/evaluating-the-support-for-migrant-victims-smv-pilot/evaluating-the-support-for-migrant-victims-smv-pilot-findings-from-a-process-evaluation and https://southallblacksisters.org.uk/app/uploads/2023/08/final-cwasu-evaluation-of-the-

which was more work for SBS. For a long time, there were only two caseworkers at SBS, and they had stayed over quite a few days until 10 pm or so in the office as such were the delays in assisting clients who did not have anywhere else to go.

- 59. We were only able to hire the much-needed extra staff in the latter half of 2020, when emergency funding from government sources became available, but this did not meet the full demand and in-kind or charitable funding and staff overtime (unpaid) was still required to meet need. Funding from central government sources such as the Minister of Justice and the Home Office (sometimes via MOPAC or other organisations), only amounted to about £190,000 over two years this was insufficient to meet the high cost of remote working with new IT and more staffing costs, and meeting the rental and subsistence costs of those with NRPF, which tend to be very expensive, especially in London.
- 60. Over eighteen months from May 2020 to Nov 2021, SBS received about £180,000 for the Crisis Project from MOPAC via SWA (part of the resettlement funding may have been from MHCLG) which only funded one Co-ordinator (and a settlement worker towards the end of the project). The rest of the money was spent on rent, subsistence, IT and other essential costs for survivors with NRPF and their children.
- 61. At the beginning of the pandemic, SBS's existing staff had to absorb the substantive extra workload which came with the increase in domestic abuse many suffered burnout as a result.
- 62. We had to absorb the additional cost required, such as smart phones/computers with data packages to ensure that the needs of our users were met, with varying degrees of success. Staff also had to take on the extra risks of meeting survivors or other professionals in emergencies or to handover food and money for the medically vulnerable, homeless due to NRPF and the isolated, despite health and safety precautions; and there were delays in obtaining PPE, deep cleaning services and setting up IT connections, such as accessing remote court hearings from the office. These issues above stemmed from a lack of forewarning and inadequate financial support from the government for front-line service providers

that supported vulnerable groups during the crisis, exacerbated by pre-existing funding shortages and capacity issues.

63. These experiences were common to those of other VAWG organisations. At the time of the pandemic, SBS had specific formal partnership arrangements with other VAWG organisations, particularly in the specialist by and for sector. These included those in the London VAWG Consortium which received funding from London Councils or MOPAC; and with groups in the North, namely Sisters4Safety in Manchester and the Angelou Centre in Newcastle upon Tyne. In addition, it also operated the SMV partnership across the UK. These partnerships were focused on domestic abuse, immigration and NRPF issues or on holistic advice/advocacy and counselling services. In all cases, partners shared a similar experience to SBS in terms of moving operations rapidly to remote and later hybrid working, increasing demands and pressure on staff and resources, including lack of fully functioning local services or refuge space, and delays in national provision such as in the UKVI in processing immigration applications and the DDVC. Most of us received emergency funding late - generally in the summer of 2020 - much later than it should have been made available to be fully responsive to increased demand and growing complex needs evident from historical and also the then current international trends, and national data provided by the sector, particularly initially by the helpline services at Refuge and Victim's Support. Also see response of agencies to call for evidence.

Accessing support from statutory services

64. Even before the pandemic, too often local councils were "gatekeeping" (engaging in unlawful practices of delay, asking for evidence etc) further to homeless applications from victims of domestic abuse (as exhibited by Rebecca Goshawk at RG/8).³⁸ There was often hostility to survivors of domestic abuse. The situation was particularly pronounced when black and ethnic minority women or migrant women applied for assistance in our experience. However, with the lockdown,

³⁸ https://www.pilc.org.uk/wp-content/uploads/2022/09/PILC-Housing-DA-Report September-2022-Final-3-2-corrected-v2.pdf RG/8 - INQ000280154

there was an added barrier due to the lack of physical in person presence of officers. The first issue was that their offices were shut, and everything was done remotely. Clients that were fleeing abuse with nowhere to go had actually nowhere to go as they could not even go and wait at the council offices. The local council was only operating over the phones, and many times calls were not answered, council staff members were ill equipped to provide assistance to domestic abuse victims, unsuitable accommodation was provided to clients who were homeless and staff were generally quite unhelpful. Many women chose to return to their abusive partner due to being subjected to insensitive, traumatizing approach to their situation. Social services in particular were not co-operative in providing prompt section 17 accommodation (accommodation for children in need, usually with their parent(s), this is one of the services that women subject to NRPF can access). In one particular case, they refused to accommodate a family fleeing abuse together, and asked the just-turned-18-year old to find her accommodation elsewhere, which caused the family to decide to go back to the perpetrator. This was only prevented due to SBS's intervention.

65. Survivors, particularly those from migrant backgrounds, feel a distrust in the police and are therefore reluctant to report abuse and therefore access support through that route. Imkaan explain in responding to our call for evidence that some of their members reported poor quality risk assessments undertaken by Police reclassifying and therefore deprioritising VAWG as 'family issues' and suggesting women stay with extended family members. The statements below are from Imkaan member organisations:

'In the last few weeks, numerous women who are on spouse visas have been denied support from domestic violence agencies, children's social care etc on the presumed premise that they have no recourse to funds." (despite Sec 17 rights)

"I have had two cases where a housing officer has said 'you are not priority need' or your domestic violence 'isn't serious enough."

"....lack of commitment to process around migrant women or communication, no specific resourcing of specialist services, a further

exclusion of black and minoritised/migrant women from services that is excused by a lack of resourcing and the pandemic.".

Personal accounts

66. Our experience 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 SBS' services.

Case study: Rachel (anonymised)

- 67. I am from Sierra Leone, my family is quite poor, and my dad passed when I was very young, and my mum raised me and my siblings. It was very hard for her. This man from my community has been showering her and the rest of my family with gifts and money and propositioned that I get married to him. I did not want to, as he was about 40 years older than me. However, my mum insisted that I get married to him as he seemed so nice and tried to look after me and my family.
- 68. He first came in contact with me when I was a teenager and since then he has been repeatedly asking me to get married to him. I finally agreed to date him after I finished my high school and went to university. He would buy a lot of things for me and the rest of my family, and I agreed to marry him when I turned 25, because I love my family and I wanted them to be happy and did not want them not to have this support, although I was miserable with this man, I tried to make it work.
- 69. At one point I told my mum how sad I am about this relationship, and she broke down crying and insisted that I marry him, so I put myself aside and went with the relationship.
- 70. I married him and he brought me to the UK in March 2017 on a spousal visa and I didn't have recourse to public funds. He was so lovely to me, and he would buy me clothes, food, pay all the bills. However, as time went on, I realized how controlling he was, and I started to feel suffocated.

- 71. I was not allowed to go anywhere by myself. Even to buy lotion, I would have to go with him. He would come home during his lunch break every day to check on me. I was not even allowed to think independently according to him. He would not let me wear clothes that I wanted to wear or wear my hair the way I wanted. I felt so suffocated, and I did not know who I was anymore. I was not allowed to go to shops, have friends, have passwords on my phone, or even go to the GP appointments by myself.
- 72. One day I was craving cassava, and we didn't have any at home. I thought since the shop was only up the road, I could quickly go get it. When I went there, the shopkeeper told me that there was no more cassava left and asked me to come back tomorrow. I was walking back home and heard a lot of honking from a car. I then realized that it was my husband, and he was following me in his car. I was so scared and shaking. I ran home and tried to calm myself. When he knocked on the door, my heart was racing. I opened the door and he immediately started to argue with me, and he slapped me after. I was too shocked to say or do anything. The physical abuse escalated, and he beat me badly that day. I called my mum crying and she said he would change and give it time.
- 73. I thought that was the only time this would happen, but I was wrong. A few months later, my sister's husband was visiting London. He asked if we could meet at Oxford Street as [he] wanted to buy a few things for my sister and wanted to have support deciding this. I asked my husband if I could go, and he said yes. However, when I was out, he called me and shouted at me on the phone and told me not to come home, I was so scared, and my sister's husband was worried for me and told me he'd drop me home. When I got home, my husband slapped me and beat me in front of my sister's husband. It was humiliating. He also told me that if I contacted anyone for help, I would be deported back to my home country. He also told me a lot of things about the society in the UK, and told me that since I am a black immigrant, I would be going into detention and that no one would be willing to help me. I was also too scared to even tell anyone apart from my mum about this.

- 74. The abuse became a regular occurrence, and I just went along with whatever he wanted from me as I did not want to risk anything further. He would also insult my intelligence, and also tell me my English is so bad. My self-esteem was so low, and I thought there was no other way of life for me.
- 75. At the end of 2019, my husband had a stroke, and he was in the hospital. While he was in the hospital, his ex-wife and children came to attack me and tried to drag me out of our marital property. I tried to stay put and would lock all doors and windows and did not respond to them.
- 76. For months I was so isolated. Everything was closed because of COVID and I was in the worst state ever. I did not know who to speak to or where to go to get help. I could not even go home if things got desperate. I could not contact my GP as the appointments were shut. I did not have any friends that I could talk to. I felt so trapped. The strict COVID rules made it difficult for me to go out of my house or reach out to anyone. When my husband's children came to threaten, I would hide in the house and cover my ears to not hear what they had to say. I was also so scared to go out to the shops because I don't know if they were waiting outside to hurt me. I would ration my food and go hungry for many days. This went on till October 2020 where they tried to break in and assault me. I called the police for the first time.
- 77. I was so scared of calling the police as I keep seeing on news how black people are treated by the force and I thought if I call them, would I end up in a worse situation than I am to begin with?
- 78. Police came to attend to my call, and during the entire interaction, I was barely functional. There was so much shouting, noise and questions and I thought I was going to faint. I was then referred to Women's Aid.
- 79. To be quite honest, I spoke to people, and agencies but I don't think they understood me. I did not feel heard or seen. I was so severely depressed and was thinking of harming myself as I didn't know how else I'd cope.

- 80. I came in contact with Southall Black Sisters in November 2020, I was placed in safe accommodation. Women's Aid referred me to Southall Black Sisters. I was placed in a hotel, and I was given weekly subsistence for my living expenses. The hotel also gave me all my meals and snacks. I had an advocate, and for the first time, I felt seen and heard. I felt that I was able to speak to someone and they understood me and my needs. It was so new for me being asked 'what do you want to do about this?' or 'where do you want to go?'. For the first time I was able to make a decision and tell someone that and not be slapped for doing so.
- 81. I was also able to have lengthy conversations with my advocate about a lot of things, sometimes I would talk about palm oil to her, and she was there to hear it. It felt like I was being looked after with love and care for the first time in my life. I can never forget how much hope that gave me. Before this, I thought the abuse came my way because I somehow deserved it. I realized that was not the case and there are people who love me and care for me for nothing in return. I became so energized now, I wanted to go out and explore the surroundings. I wanted to study and work. All these things seemed impossible before.
- 82. My advocate helped me with my immigration, and she also helped me with so many other things that I was not even aware that I should be doing. SBS applied for a DDVC, and I got it in a few weeks. I was then able to go into a refuge after I got my DDVC granted. I was also given a rail ticket by my advocate to get there. They then referred me to a solicitor, and they applied for my indefinite leave to remain. My advocate also wrote a detailed support letter for me. She encouraged me to study and work and be independent. She wrote a support letter for me for my immigration which I later used for my job as well. I stayed at the refuge for six months, and I was able to recover and rest during this stay. I was able to plan for my future. I work in healthcare now.
- 83. When I called the police for the first time, I could barely speak. I felt like I did not know words. Now I can advocate for myself. If I am being treated badly, I am able to stand up for myself. When I look back now, I often think, if not for SBS intervention, and that accommodation, I don't know where I'd have been. I don't

know if I will be alive now. I am so grateful for that brief period of my life that gave me a lifetime of hope and strength.

Case study: Raina (anonymised)

- 84. It was most horrible at the time. I was always inside the house. He never let me go to the park for a walk. He did leave the house to go for a walk. I was 24/7 inside the house confined to my room. Even using the washroom and kitchen was a task for me. I took one of my kids in the kitchen so I could cook in peace. The kids were also online schooling, but they had their own space for their computers.
- 85. He used to go for a walk but he wouldn't let me leave the house. Even the kids left the house only on a rare occasion he used to make petty excuses like "the virus is in the air".
- 86. I didn't have a choice, for the whole of Covid, I didn't have a choice. I was only confined to my room. I became mute, I was so depressed, and I didn't feel like talking. In November 2021 (when she finally left) my speech was so less I started stuttering when I had to speak to many people. They thought I couldn't understand what they were saying and I was so devastated by that thought. It took me 8 or 9 months to get my speech back to a normal pace. Till this day when I go out it makes me feel very anxious.
- 87. Covid was for me, not less than a nightmare. There were constant fights because of him being around all the time. It made me so anxious, I was living in a nightmare without end. Covid for me was a nightmare.
- 88. He said you are 24/7 in the house, why do you need a phone. You can use the children's or mine. All my documents were with him. Till date my passport and everything is with him. My and my son's he hasn't given them to us. [Fortunately the daughter had her passport because she needed it for her University and she had it when they left].'

Case Study N

- 89. N was subjected to domestic abuse by her husband. She had an insecure immigration status and this caused much difficulty when she sought help from the Newham Crisis Team. The Perinatal Team also withdrew their service and did not help her because of her status. The abuse worsened at home by her husband during lockdown as he was furloughed and finances were limited. The perpetrator started subject N to verbal abuse and displayed controlling and coercive behaviour, often causing arguments between them. N contacted SBS in March 2021. She was destitute at this point. She was in Kent, but given the complexity of her case, no other agency would have been able to support her.
- 90. SBS moved her into SBS's Crisis Project NRPF accommodation., Mental health support to N was delayed due to Covid and there were delays with the courts because of Covid. We supported her with child arrangements, regulating her immigration status and eventually she got custody of her child. SBS even facilitated the child contact that occurred on weekends as it was ordered by the courts.

Case Study M

91. M arrived in the UK on a visitor's visa in March 2020. M was abused by her aunt in Nigeria and this continued in the UK. M escaped her aunt's house in the UK and sought refuge in a church. M's aunt threatened to tell the Home Office that her visa was about to expire and continued to abuse her. M stayed in the church until Dec 2021. M was referred to the Covid-19 Crisis Project so that she would have somewhere safe to live else she would have been destitute. SBS worked with her solicitors for asylum application. M could not have face to face meetings with the solicitors and was limited to telephone appointments due to COVID. She was also restricted from going out of the temporary asylum accommodation due to COVID restrictions. SBS tried to request proof of sec98 accommodation support letter from the asylum team for immigration legal aid. SBS also supported her with asylum application as there were threats of FGM and forced marriage for client back in Nigeria.

Case Study Joy (anonymised)

- 92. 'Joy' is Jamaican, aged 47 years old. She moved to the UK in 2001 on a visitor's visa. Joy contacted SBS in mid April 2021 as she was street homeless. She had previously been living with her abusive partner and subjected to verbal, emotional, psychological, financial, and sexual abuse. She disclosed that the perpetrator would threaten to have his friends beat her up and kill her. He would also lock her out of their home sometimes, but she stayed with him because she had nowhere. She was scared to call the police for help as she feared she would get deported.
- 93. In early April 2021, the perpetrator kicked her out of the property after he was emotionally and verbally abusive towards her. She called the police for help, and they accommodated her for three nights in Wembley. She was homeless and sleeping rough in parks until SBS began providing her with temporary accommodation and a weekly subsistence from the NRF.
- 94. SBS were unable to have regular contact with Joy because her phone was not working. She also did not have an email account so SBS and her solicitors were unable to make telephone appointments with her during the COVID- 19 lockdown. However, her legal aid application was approved in June 2021, and we helped her collect evidence for her immigration application. However, we were only later informed that Joy could not provide her statement or communicate with others to collect evidence, because she was embarrassed to disclose that she cannot read or write.
- 95. Joy's solicitors informed us that she was leaving the firm and closed Joy's case because she could not contact her. We referred her to another solicitor in August 2021, who has submitted a 20 year rule application [for leave to remain], which is pending.
- 96. The impact of Covid was summarised by Joy as:

"Covid was so scary and different experience. Everybody was scared. You couldn't go around to anyone. It was a scary and challenging time for my mental health. However, I had to summon up my internal resources and keep strong. Not everyone was able to do that. I had feelings I cannot explain. I give thanks to have been able to make it through as not all of us were strong enough to deal with the situation. When I was thrown out there was no one I could turn to. No one wanted to take me. It was too risky for people."

But when she made contact with SBS,

"When [SBS] answered the phone it was the happiest time. [They] sent me a taxi. I thought I was dreaming."

Case Study Natasha

- 97. Despite being a victim of domestic abuse, in Feb 2021, Natasha was forced to leave her daughter with the perpetrator during the pandemic because the police told her that she would be putting her child at risk if she left the house with her due to the possibility of infection. She said to SBS; who later helped her to obtain contact with her daughter, that "It was the biggest most traumatising thing of my life because it has affected everything since... I abandoned my child but I didn't. I merely listened to the authorities."
- 98. Natasha came to SBS in March 2021 when she was in the hospital after taking an overdose. SBS placed her in a hotel due to NRPF, but which we changed later due to ill treatment by the hotel staff.
- 99. She said "It was traumatising for my mental health although I was grateful to have a roof over my head, I felt I was in a controlling situation again now by society. We were also treated very as migrants by the staff even though we had a right to be there. For example if your key card didn't work and you phoned guest services to give you a new one we were treated in a rude manner. We were treated as trash."
- 100. Delays due to the pandemic and the international refugee crisis in Ukraine and Afghanistan meant that it took 18 months to resolve Natasha's immigration status.

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

Prior to decision to lockdown on 23 March 2020

- 101. The Government would have known from the outset that domestic abuse would increase as a result of lockdown measures. There is long-standing evidence which is in the public domain showing that rates of VAWG typically increase in periods of crisis and conflict, including wars and natural disasters. I have also seen documents disclosed to the Inquiry which show Government's internal discussions around this (see Rebecca Goshawk's Witness Statement dated 20 September 2023, at paras 103-126).
- 102. It is also well-documented that these moments of crisis aggravate pre-existing inequalities by further marginalizing already disadvantaged groups who have less access to resources that would provide greater practical resilience, such as financial reserves, flexible working, childcare, social support, secure immigration status, lifting NRPF, and access to credit.
- 103. A report by the Women's Budget Group (HS/29) states that women constitute the majority of those providing care (both paid and unpaid), the majority of health workers, are more likely to be employed in the service sector, more likely to be on zero hours contracts, and more likely to be dependent on social security and social housing. As a result, women were at greater risk of exposure to Covid-19 as key workers and more likely to be impacted by lockdown and social distancing measures. Another analysis by Women's Budget Group finds that prior to the pandemic, women were the majority of people living in poverty and female-headed households were more likely to be poor. Many of these women were also disabled or suffered from race and ethnicity-based inequalities (HS/29).³⁹
- 104. This evidence ought to have been enough to alert the government to the likely increase in VAWG in the event of a pandemic, and it was plainly clear that lockdown and social distancing measures would have a particular impact on victim-survivors of VAWG as a result the reduced capacity to spend time away from perpetrators of violence and to leave the household in general.

Government's consideration of the rise of domestic abuse

³⁹ https://wbg.org.uk/analysis/the-female-face-of-poverty/ HS/29 - INQ000281081

105. The government did not adequately factor in how domestic abuse victims would be affected prior to announcing the lockdown. 6 days after announcing a national lockdown, on 28th March, 2020, Priti Patel announced that domestic abuse victims would be allowed to leave to escape their partners during the lockdown (HS/30).40 In the backdrop of heightened policing and implementation of special lockdown enforcement measures, this announcement was not just late, but also did not take into account the difficulties that victim-survivors would face in leaving home and potentially being confronted by victim-blaming attitudes. This could have resulted in both increasing risk by staying at home and women's accounts of abuse not being believed or acted upon by the police and other agencies when they did seek help. Women could have been accused of failing to take action to protect themselves and their children. However the messaging was not consistent. At the same time guidance regarding stay at home was issued which did not refer to domestic abuse (HS/31).41

Representations by SBS and others

- 106. SBS made a strong effort to communicate the impact of the pandemic on its service users to the government. To this end, we signed various open letters along with the sector, attended meetings with the VAWG sector, government officials and ministers when invited.
- 107. SBS also contributed to the United Nations High Commission for Human Rights inspection in relation to Covid-19 and VAWG. SBS also launched a campaign 'My Life Under Lockdown' which highlighted the experiences of survivors of domestic abuse during national lockdowns.

 $^{^{\}rm 40}$ https://www.dailymail.co.uk/news/article-8163919/Priti-Patel-admits-home-not-safe-haven-abuse-rises-amid-Covid-19-crisis.html

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/883116/Staying at home and away from others_social_distancing_.pdf | HS/31 - INQ000281084 |

- 108. SBS sent the following correspondence directly to the UK government in writing.
- 109. On 31 March 2020, SBS along with over 50 organisations 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 (as exhibited by Rebecca Goshawk at RG/12).⁴²
- 110. On 3 April 2020, SBS signed a Joint letter to the Prime Minister from VAWG sector organisations calling for the need for urgent measures to prevent and reduce abuse during the epidemic. This letter was signed by over 20 organisations. SBS 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 and equal protection for migrant survivors. A substantive response was not received from a minister until 14 October 2020.
- 111. On 27 April 2020, as it became clear that no response to the sector-wide campaign was forthcoming, SBS took steps to indicate the initiation of a legal challenge and along with SWA, sent a pre-action protocol letter against the Government (as exhibited by Rebecca Goshawk at RG/8). The threat of 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 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:

⁴² Measures Urgently Required to Protect and Support Domestic Abuse Survivors, dated 31 March 2020 [RG/12 - INQ000280134]

- 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

112. The letter also argued:

- i. 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.
- ii. 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.
- 113. On 2 May 2020, as a result of a sector-wide campaign, lobbying and the threat of legal action, the government announced an additional £76m to support survivors of abuse (as exhibited by Rebecca Goshawk at RG/44).⁴³ However, the Government did not prioritise the organisations that were the most impacted, including black and ethnic minority and migrant-specialist organisations.
- 114. SBS also attended several meeting with public bodies during the period of April 2020 to February 2022 at which it raised concerns in relation to the relationship between the Covid-19 pandemic and VAWG. It is important to note that the focus of the meetings that SBS attending during this period were not always specifically related to the impact of the pandemic, rather about the impact of abuse more generally. However, the impact of the pandemic was naturally raised as part of

⁴³ Coronavirus: Government pledges £76m for abuse victims - BBC News RG/44 - INQ000280174

these discussions, but not necessarily reflected in the corresponding agendas or minutes.

115. The meetings SBS attended during this period are as follows:

- a. Meetings with MOPAC, on 16 and 20 April 2020
- b. Meeting with the Shadow Justice Minister, on 7 May 2020
- c. Evidence given in meeting with the Domestic Abuse Bill Committee, on 4 June 2020
- d. Evidence to the All-Party Parliamentary Group ('APPG') on domestic abuse on 11
 June 2020
- e. Roundtable discussion with Equality And Human Rights Commission EHRC on 22
 June 2020
- f. Advisory group with the Victims Commissioner on 13 July 2020, 2 December 2020, 12 April 2021 and 4 July 2021
- g. Meeting with Domestic Abuse Commissioner Office on 27 July 2020, 21 April 2021,25 May 2021, 26 January 2022
- h. Meetings with Ministry of Justice on 28 Aug 2020 and 10 September 2020
- i. Presentation to the House of Lords on migrant women on 22 September 2020
- j. Presentation to the UN Human Rights Council on 28 October 2020
- k. Roundtable with Victoria Atkins Safeguarding Minister on 19 October 2020
- Meeting with Home Office regarding forced marriage on 28 January 2021
- m. SBS response to Home Office's consultation on the national Violence against Women and Girls Strategy Call for Evidence in Feb 2021.
- Meeting with Home Office regarding firewalls on 14 May 2021, 12 August 2021,
 September 2021, 31 October 2021 and 4 November 2021⁴⁴
- o. Meeting with Home Office on the role of migrant commissioner on 17 May 2021
- p. Evidence given in a meeting with the APPG on domestic abuse on 24 May 2021
- q. Home Office VAWG stakeholder group on 25 July 2021, 14 October 2021, 25 January 2022
- r. Roundtable discussion with then Home Secretary, Priti Patel on 14 July 2021,
- s. Round table discussion with Victims' Commissioner on family law on 20 July 2021

⁴⁴ The firewall aims to establish a complete separation between agencies like the police and Immigration Enforcement of sharing of personal data of migrant victims of abuse.

- Roundtable discussion with Domestic Abuse Commissioner on family law on 3
 Sept 2021
- Roundtable discussion with the Greater London Authority (Police and Crimes Committee) on 3 Dec 2021.

Articles and reports published or contributed to by SBS

- 116. From March 2020 onwards, SBS were active in contributing to articles, publications and reports:
 - a. Letter, on behalf of SBS and Solace Women's Aid regarding Covid-19 –
 Measures Urgently Required to Protect and Support Domestic Abuse Survivors,
 dated 31 March 2020 (as exhibited by Rebecca Goshawk at RG/12)
 - b. Submission to Home Affairs Select Committee: (Home Office preparedness for Covid-19 (Coronavirus): domestic abuse and risks of harm within the home – dated April 2020 (HS/32) HS/32 - INQ000281085
 - c. Letter to Prime Minister Boris Johnston and (then) Home Secretary Priti Patel to demand a public inquiry into the handling of the Covid-19 crisis, co-signed by SBS – dated 09 April 2020 (HS/33) HS/33 - INQ000281086
 - d. 'I have five minutes and I need help': Life on the domestic abuse frontline during coronavirus, article in the Telegraph dated 18 April 2020 (HS/34) HS/34 INQ000281087
 - e. My Life Under Lockdown SBS campaign
 - f. Press release SBS and Women's Charities Urge Government to Help Women and Children Escape Abuse dated 11 April 2020 (HS/35) HS/35 INQ000281088
 - g. Domestic violence funding legal challenged launched, article in the New Statesman – dated 27 April 2020 (HS/36) HS/36 - INQ000281089
 - h. SBS written evidence to the Women and Equalities Committee on Unequal Impact: Coronavirus (Covid-19) and the Impact on People with Protected Characteristics-May 2020 (HS/37) HS/37 - INQ000281090
 - Press Release from Southall Black Sisters & Solace regarding the launch COVID-19 Crisis Project to Create Urgently Needed Safe Housing for Women Fleeing Domestic Abuse, article dated 12 May 2020 (HS/38) HS/38 - INQ000281091
 - j. SBS submission to United Nations High Commissioner for Human Rights -24 June 2020 (HS/39) HS/39 INQ000281092

- k. BME domestic abuse charity sees highest volume of calls for help in 40-year history during lockdown, article in the Evening Standard dated 16 June 2020 (HS/40)[HS/40 INQ000281094]
- I. Vulnerability Knowledge and Practice Programme (VKPP) Domestic Homicides and Suspected Victim Suicides During the Covid-19 Pandemic 2020-2021 report, contributed to by SBS – dated 25 August 2021 (HS/41).[HS/41 - INQ000281095]

The current situation

Have effects of C19 & lockdown dissipated?

- 117. While experiences of the pandemic and the lockdowns have largely dissipated now that society has re-adjusted to a post-pandemic world, the impact of the escalation of abuse remains for victim-survivors, and caseworkers who suffered burnout and left the sector and by and for organisations who struggled to survive amidst the pressures of the pandemic.
- 118. Demand has also remained high with greater financial pressures created by costof-living crisis which continue to impact on survivors and the VAWG sector.
- 119. Going forward, the funding gap for the by-and-for sector needs to be plugged and the government immediately needs to introduce sustainable, long-term ringfenced funding.
- 120. VAWG sector workers need to be recognised as frontline key workers in crises.
- 121. The long-term impacts of the pandemic on the mental health of survivors and staff is prevalent amongst the sector; and needs more investment to address.
- 122. Al-Hasaniya (a Middle Eastern women's group) in response to our call for evidence talk about the sustained mental health impact of the pandemic. Staff and volunteers reported immediate mental health impacts amongst clients and users, including increased anxiety, depression, loneliness and bereavement. The potential for those mental health impacts to become enduring mental health needs

remains a concern for staff and volunteers. While staff were able to adapt services to lockdown measures, they also experienced increased anxiety and fears both personally and professionally. These anxieties revolved around their own physical and mental health and around new and existing clients. Lockdown meant contact with clients accessing services became harder, with additional risks to women. Despite adapting safety plans with women around when and how to contact the charity, staff were left with additional anxieties about the women and whether abuse had escalated unmonitored, often with no way of communicating until women contacted them. Staff also experienced bereavement for clients who passed away during the pandemic, with no way of participating in mourning rituals that may help process grief.

SBS concerns

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

123. Overall SBS does not believe that those they support were adequately considered when the UK Government was making decisions about the pandemic. The Government failed to anticipate or plan for the inevitable increase in domestic abuse, failed to consult us or any other by and for specialist organisations led by black and ethnic minority women, failed to properly fund services responding to the rise in domestic abuse, failed to consider pre-existing inequalities and the impact of the hostile environment on migrant survivors of abuse, and failed to mitigate against the hardship suffered by those with NRPF during the pandemic. There was no clear messaging so that survivors knew they could leave their homes and what avenues would be open to them to seek support. The Government also failed (and has continued to fail) to consider the long term impact that the pandemic would have on survivors and the specialist services that are set up to support them.

A lack of consultation with SBS (and other specialist organisations)

- 124. SBS were given no advanced notice of the pending lockdown, what to expect, or guidance about how to support and advise vulnerable women during the lockdown. The week before lockdown was implemented, SBS had a week within which to device, develop and implement contingency plans in the delivery of frontline services to some of the most vulnerable and isolated women and children in our society. This was not only a case of rapidly adapting to maintain our service levels as best as possible at the usual rate of referrals, but also attempting to expand our service in these conditions to attempt to accommodate the dramatic increase in referrals that we received.
- 125. In addition, being a by and for organisation led by black and ethnic minority women, SBS often do not get invited to events or meetings mainstream organisations are asked to attend. For instance, Prime Minister's Hidden Harms Summit on the 21st May, 2020 seems to have been an event attended by other organisations in the sector. Even though the themes of the summit are extremely relevant to the experiences of black and ethnic minority women, we were not invited to attend. Some of the documents disclosed by the Home Office refer to consultations with front line advisors, but we do not believe this included SBS or most of the specialist by and for sector at high level meetings.
- 126. The lack of consultation throughout the pandemic was felt by many VAWG organisations. In response to our call for evidence:
- 127. BSWA had no direct contact with the national government and independently made the decision before the government lockdown was announced on 23rd March, 2020 to send all staff to work from home, and close their main office base. They had regular contact with local and regional government about specific issues for women and children and raised specific issues around women with NRPF. They do not recall any specific communications for the VAWG sector. According to them, the national government's communications appeared to minimize risk until too late.
- 128. LAWRS are of the view that consultation and engagement would have ensured that the needs of these groups were factored into pandemic preparedness and response, would have helped to mitigate the impacts of 'lockdown' measures on

women and experiencing domestic abuse, and would have ensured that specialist support services would have been better prepared and equipped to respond to the crisis.

- 129. It is Refuge's view that survivors of VAWG were not adequately consulted and there was no engagement with the VAWG sector to feed into policy development and no action taken to ensure VAWG services would be able to stay open or respond to anticipated increased demand. This is despite evidence emerging very quickly from countries that went into lockdown before the UK that reporting of domestic abuse increases and survivors needed enhanced support. Refuge further note that despite repeated calls from the VAWG sector, there was no coordinated cross-government activity to mitigate the impacts of Covid-19 on survivors and prevent abuse.
- 130. Women's Aid argued that, whilst the government was quick to take unprecedented measures to support businesses, workers and clinically vulnerable people during the Covid-19 crisis, there was a severe lack of a coordinated strategy to protect women and girls and to prevent abuse. Particular concerns included the lack of engagement with the VAWG sector in advance of 'lockdown' to enable services to adequately prepare and ensure continuity, Domestic abuse and VAWG specialists were not included in the highest levels of COVID 19 planning, such as in COBRA meetings, to mitigate the impact of Covid-19 on the rights of all women and girls to live free from violence.
- 131. I note that Refuge were included in some of the discussions with government. Despite that, in response to our Call for Evidence, Refuge raises the lack of clear messaging by the government.. Refuge also note that while the UK government did act on some policy recommendations made by Refuge and other VAWG sector organisations, these responses were relatively slow and piecemeal. These policy recommendations were:
 - a. Launching a public awareness campaign making it clear survivors of domestic abuse could leave their homes
 - b. Providing emergency funding for the VAWG sector

- c. Designating refuge and other VAWG workers as key workers.
- 132. This suggests to me that the content of meetings with the VAWG sector may not have been adequately listened to by government
- 133. The government ought to have engaged with the VAWG sector, academic and thematic experts, and been aware of the wealth of resources already published on the subject of domestic abuse and its particular impact on migrant women, to ensure that legislative opportunities for protecting migrant women are not missed. As discussed above, these could have included review and repeal of hostile environment policies including NRPF conditions. The crisis also presented even stronger evidence for extension of the DVILR and the DDVC to all migrant victim-survivors of abuse and extending the time period from three months to six months, and for the creation of a legal 'firewall' between agencies such as the police and social services, and immigration enforcement. The crisis also highlighted the need for ringfenced funding for specialist services for migrant women facing VAWG which SBS and many other organisations have campaigned for over many years.
- 134. The Domestic Abuse Commissioner and Victims' Commissioner also ought to have been included in all relevant planning and coordination groups, particularly the Covid-19 ministerial group and relevant COBRA meetings. Every relevant Secretary of State should have been assisted to ensure that the interests of survivors of VAWG were represented at all levels of departmental Covid-19 response planning and including the prevention of increased levels of VAWG among their priority objectives.

Lack of clear messaging

135. The message that was heard loud and clear when the first lockdown was announced was the Government's advice to 'stay at home'. The government did not adequately factor in how domestic abuse victims would be affected prior to announcing the lockdown, how they would know they would be able to leave

homes to flee abuse, or how they would know about the avenues available / open to them to do so.

- 136. It was not until five days after the national lockdown was announced, on 28th March, 2020, that Priti Patel first announced that domestic abuse victims would be allowed to leave to escape their partners during the lockdown (HS/42).⁴⁵ In the backdrop of heightened policing and implementation of special lockdown enforcement measures, this announcement was not just late, but also did not take into account the difficulties that victim-survivors would face in leaving home and potentially being confronted by victim-blaming attitudes.
- 137. On 11th April, 2020 Priti Patel, Home Secretary at the time, announced a campaign to raise awareness about domestic abuse titled #YouAreNotAlone (as exhibited by Rebecca Goshawk at RG/54).⁴⁶ This campaign did not provide any tangible support and due to its digital nature, effectively excluded marginalised victim-survivors, such as those with communication barriers, lack of digital literacy and English language, lack of access to devices and the internet and migrant women who feared being reported to immigration enforcement for reporting domestic abuse to the police. The campaign also did not seem very targeted and therefore may not have reached many women and girls within the black, ethnic minority and migrant community facing domestic abuse.
- 138. The lack of messaging was an issue for many other VAWG sector organisations (HS/1)⁴⁷:
 - i. Imkaan questioned whether enough was being done in terms of translating information leaflets about COVID-19 and physical distancing for people for whom English is an additional language, and more broadly the availability and accessibility of cultural and

⁴⁵ https://www.independent.co.uk/news/uk/home-news/coronavirus-domestic-abuse-lockdown-priti-patel-a9432646.html | HS/42 - INQ000281096 |

⁴⁶ https://www.gov.uk/government/news/home-secretary-announces-support-for-domestic-abuse-victims RG/54 - INQ000280184

⁴⁷ Response to call for evidence HS/1 - INQ000281059

language specific support for migrant women. The Home Office's domestic abuse awareness raising campaign was welcomed, however, the message should be adapted further to ensure is accessible and culturally appropriate to other women facing other barriers including digital inequality and exclusion. LAWRS raised a similar point that there was a real need to translate resources and they resorted to unpaid translations because they wanted materials to be accessible for their communities.

- ii. Imkaan further noted that Government announcements and daily communications were delivered without any consideration of the equalities impact which meant that accessibility needs were not considered as part of pandemic related updates. This created significant barriers and safety concerns for women/girls with communication barriers.
- iii. Schemes that were designed to aid safe disclosure in public spaces within the community such as *Ask Ani* e.g., Boots pharmacies again were introduced but again without adequate consideration of accessibility needs across marginalised and diverse communities. Imkaan members spoke about feeling that these schemes did not benefit the women they support because of cultural, social, linguistic needs and relevance. Often these schemes are introduced in reactive ways without sufficient consideration of reach and with a lack of evaluation to assess their take-up, effectiveness and suitability for survivors.
- iv. Refuge explain that the Government did not make it clear at the earliest opportunity that survivors of domestic abuse could leave their homes to seek help, despite the clear and well-documented risks of being locked down with your abuser.

- v. Many of the organisations, including Anah Project and Women's Aid explain that survivors often were not aware that they were not breaking the law when fleeing. There was a lack of safety advice, communication and awareness raising on domestic abuse when initial lockdown measures were taken, including to make clear that the 'stay at home' rules did not apply to people experiencing domestic abuse.
- vi. Refuge emphasise that a government press conference making clear that survivors could travel in order to be safe and communicating that the police would still respond to domestic abuse calls did not take place until 11 April 2020. While this press conference was welcome, Refuge argue that it should have happened much sooner. The National Domestic Abuse Helpline received calls from worried survivors 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.

Failure to consider pre-existing inequalities, and the impact of the hostile environment on migrant survivors

- 139. As noted above, the already disproportionate impact of violence and abuse on migrant women resulting from the intersectionality of their oppression amplifies both the ways in which violence is experienced and the barriers to accessing support and justice. Women with insecure immigration status and NRPF find that control of immigration status takes precedence over their rights as victims of VAWG within the 'hostile environment', and statutory and other support services frequently fail to provide the type of help they require.
- 140. The specific vulnerabilities and barriers that women from black and ethnic minority communities and migrant women with insecure immigration status face pertaining

to gender-based violence did not inform the government's decision-making during the pandemic. This was apparent from the lack of action in response to the well-documented evidence of the impacts on women from these communities of harmful policies under the 'hostile environment' such as public sector data-sharing with immigration enforcement, NHS charging policy for people subject to immigration control, NRPF conditions, and public spending cuts. These ought to have been reviewed before the pandemic struck, and proper consideration given to the increased risk of harm to women from these communities as a result of these policies in the event of a pandemic.

- 141. During the Covid-19 pandemic crisis, abused migrant women were further obstructed from escaping abuse due to the embedding of immigration surveillance in all public and essential services, including healthcare, schools, housing, and emergency services. This could have been avoided had concerns around data sharing of victims and witnesses of crimes with the Home Office for immigration enforcement purposes been taken seriously, as repeatedly recommended by organisations including SBS.
- 142. Whilst Covid-19 was placed on the list of exempt conditions for NHS charging, this is not sufficient to ensure equitable access to healthcare, as evidence shows that the existence of healthcare charging and ID checking in and of itself will deter migrant populations from seeking help. For example, there is evidence that the current NHS charging policy has a deterrent effect on people with tuberculosis which resulted in delays to diagnosis, despite tuberculosis being an exempt condition (HS/43). This is not only a public health issue in that diagnostic delays of Covid-19 cases could lead to greater spread of the virus and serious risk to the health and lives of affected patients, but once again also creates a barrier to accessing healthcare appointments which provide the opportunity for victim-survivors to disclose abuse.

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

- 143. As noted above, survivors have always had the fear of immigration enforcement used as a form of abuse by perpetrators. See The Domestic Abuse Bill & Migrant Women: A Briefing Paper by Southall Black Sisters (HS/10),48 The Domestic Abuse Bill & Migrant Women: A Briefing Paper by Southall Black Sisters No 2,49 Covid-19: Briefing to the Home Affairs Committee (HS/6)50. During the covid-19 pandemic, SBS made specific representations that the condition of NRPF should be suspended, particularly for women subject to domestic abuse.⁵¹ Despite this, the Government made the decision to maintain the NRPF conditions. As a result, migrant victims of domestic abuse were prevented from accessing vital services and were also potentially subject to immigration enforcement.
- 144. Government's position on not lifting the NRPF condition during the pandemic was that there was existing support for domestic abuse victim-survivors and therefore there was no need to lift NRPF beyond the normal rules (HS/32).52 The Government also considered that to lift the NRPF condition, would act as a 'draw' to other immigrants (see briefing to the International Ministerial Implementation Group dated 23 April 2020 INQ000053175). However, there was no support for victim-survivors on non-spousal/partner visas or undocumented victim-survivors. Moreover, even those eligible for DDVC and Section 17 support were subject to delays. The SMV fund existed in year 2 of pandemic, but it too had its limitations and the pandemic made those on non-spousal/partner visa holders and the undocumented even more isolated (HS/44). 53
- 145. The government certainly could have been better prepared, as there was extensive evidence available on VAWG in black and minority ethnic communities, and the particular vulnerability of women with NRPF conditions. The report 'Safe and

⁴⁸ https://southallblacksisters.org.uk/app/uploads/2021/01/sbs-house-of-lords-briefing-september-2020.pdf ⁴⁹https://southallblacksisters.org.uk/news/the-domestic-abuse-bill-migrant-women-briefing-paper-2/

²⁰²⁰ HS/10 - INQ000281060 HS/6 - INQ000281107 50 Statement to the Home Affairs Committee https://committees.parliament.uk/writtenevidence/2184/pdf/

⁵¹ COVID-19: DOMESTIC ABUSE SERVICES CALL FOR URGENT SUPPORT FOR MIGRANT VICTIMS BLOCKED FROM SAFETY, HEALTHCARE AND REFUGES - PRESS RELEASE - Step Up Migrant Women 52 See Paper titled 'Mapping of non-shielded vulnerable groups' [INQ000083379] that refers to victims of domestic abuse and those with NRPF as 'target groups'. See also the Cabinet Briefing Gold Command Dashboard dated 14 April 2020 [INQ000053036] and the FCO paper to the International Ministerial Implementation Group dated 23 April 2020 [INQ83764]. HS/32 - INQ000281085 https://southallblacksisters.org.uk/news/support-for-migrant-victims-fund-evaluation/ HS/44 - INQ000281098

Secure: The No Recourse Fund Report of Findings' was provided to the government in 2019 (and made available to the public in 2020) (HS/13). There was also substantial discussion of NRPF conditions in relation to the Domestic Abuse Bill and SBS published briefing papers on the subject in March 2019 (HS/10) and March 2020 (HS/6) as well as evidence to the Migrant Victim's Review published in July 2020, bur required considerable discussion with Government beforehand (HS/45). In light of this evidence, it is inexcusable that the government did not consider the disproportionate impact that non-pharmaceutical interventions, such as lockdown and social distancing, would have on women with NRPF and take mitigating action to pre-empt and protect them from harm.

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

- 146. The impact of Covid-19 has impacted seriously both on victims-survivors and on the VAWG sector. The sector has still not returned to normal or pre-pandemic levels of service, more of SBS staff experienced burn out, funding or donations for routine services for the sector have reduced (despite recent relatively small injection of funding from the Home Office for tenders from the specialist and the by and for sector, but which failed to significantly increase the sums needed or the ability for small providers to compete) and there continues to be increased pressures on demand, resulting in substantial rise (which tripled in year two of the pandemic) in cases and enquiries in SBS, but also heightened for others in the VAWG sector, . The responses to our Call for Evidence showed common problems which need to be addressed by government both in order to reduce on-going harm, and also to prevent reoccurrence in any future pandemics.
- 147. Given the high increase in demand for SBS's services, we urgently require funding to continue our operations. In the absence of sustainable funding structures for by and for organisations, we have to spend a considerable time and effort into fundraising. Whilst we have received funding from various streams as a result of our efforts, we still have not received a sufficient amount to recover from the pressures of the pandemic on our services.

- 148. Whilst the funding announced on 2 May 2020 was welcome, there were issues which remained about which organisations would benefit and a concern that specialist services supporting migrant women would lose out when they were already at breaking-point.
- 149. Imkaan explain that three quarters of their members had less than three months reserves at the onset of COVID-19 and told us they were three-times more likely to be concerned about financial survival than white peers. In a survey Imkaan conducted, (*Lessons from Lockdown, 2021*), only 10% members reported being able to sustain crucial support services for Black & minoritised women and girls (HS/46).
- 150. In Imkaan's COVID-19 submission to the Select Committee on Human Rights, they stated that 'Government COVID-19 emergency funding to the sector was announced on 2 May 2020, 6 weeks after lockdown. The allocation only just came through at the end of May. By this time, the cumulative effect, or period of increased exponential demand for services was very evident.'
- 151. Imkaan further explain that the Government funding was too short term and some groups had to wait over 6 months for a decision by which time it had a significant impact on staff recruitment and retention. The negative repercussions of short term and patchy funding was emphasised in the one-year review statement coproduced by Imkaan with partners in the VAWG sector: "There was no ring-fence on funding for services led by and for Black and minoritised women, deaf and disabled women, and LGBT+ survivors, who face the most severe funding challenges and often required major adaptations in order to work remotely. The Treasury deadline of spending emergency funding by the end of March 2021 has been wholly ineffective. Delays in delivering the funding meant that additional staff have only recently been recruited, but in some cases are now facing notice of redundancy. It also fails to acknowledge that we are still in the midst of the pandemic, and services will not stop facing demand on April 1st 2021".54 Funding

⁵⁴ Women's Aid (and 5 other orgs) Covid One Year On - https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/2021/03/COVID-19-One-Year-On-Statement-March-2021.pdf

plugged a gap but it did not alleviate the precarious position by and for VAWG organisations already were in pre-COVID due to decades of historical and disproportionate 'underfunding'. During COVID-19 this created and exacerbated the challenges black and ethnic minority women/girls faced in their access to both timely, appropriate trauma-informed support.

- 152. The Anah Project applied for emergency grants from government but they felt that the grants were too short-term and the needs of the victims during this critical time. One significant issue with the government funding was that it consistently arrived late, leaving organisations with limited time to allocate and spend the resources effectively before the grant expenditure date. This delayed funding added to the burden of managing services and supporting victims during an already challenging time. While the initial funding was helpful, it proved insufficient to fully meet the escalating demands and challenges posed by the pandemic.
- 153. Women's Aid note that whilst much of the sector received emergency funding from the Government, there were challenges in applying for this, particularly amongst smaller organisations. There remain severe concerns about sustainability going forward and services' ability to recover from the crisis (HS/8). ⁵⁵
- 154. A joint statement marking a year of the pandemic by Imkaan, WAFE, Women's Aid Federation Northern Ireland, Welsh Women's Aid, Scottish Women's Aid, EVAW in March 2021 stated: "There was no ring-fence on funding for services led by and for Black and minoritised women, deaf and disabled women, and LGBT+ survivors, who face the most severe funding challenges and often required major adaptations in order to work remotely. The Treasury deadline of spending emergency funding by the end of March 2021 has been wholly ineffective. Delays in delivering the funding meant that additional staff have only recently been recruited, but in some cases are now facing notice of redundancy. It also fails to acknowledge that we

HS/8 - INQ000281109

⁵⁵ Women's Aid - 'Shadow Pandemic – Shining a light on domestic abuse during covid' https://www.womensaid.org.uk/wp-content/uploads/2021/11/Shadow Pandemic Report FINAL.pdf

are still in the midst of the pandemic, and services will not stop facing demand on April 1st 2021" (HS/47).⁵⁶

155. According to the Women's Resource Centre's survey of 71 organisations: 21% of organisations surveyed by said they had not received any emergency funding during the last year. London-based organisations were more likely to have received emergency funding during the pandemic than organisations elsewhere (HS/25). ⁵⁷

Issues about repatriation & forced marriages

156. There was an overall fall in repatriated forced marriage cases, which are usually referred to SBS to re-settle in the UK from the Government's Forced Marriage Unit (FMU). According to our funding reports to the FMU, from April 2020-March 2021, we have 4 repatriated cases of forced marriage. For the same period the year before, we had 13 repatriated cases referred by the FMU. For the 7 month period from 1 April to 30 Sept 2022, we had 6 cases (including 1 child).

- 157. The fall in referrals to SBS from the FMU may have been due to closure of airports, but also because of Covid restrictions imposed in the country where women were being held.
- 158. There was 759 incidents of forced marriage and female genital mutilation (FGM) reported to the Government's national FMU in 2020 (750 were solely on forced marriage), which was a drop of 44% (1,359) in the average number of cases received annually between 2011 and 2019 (HS/48).⁵⁸ This is likely to be due to victims unable to contact the FMU during the lockdowns in the UK and overseas,

⁵⁶ Women's Aid (and 5 other orgs) Covid One Year On - https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/2021/03/COVID-19-One-Year-On-Statement-March-2021.pdf HS/47 - INQ000281101

⁵⁷ https://www.wrc.org.uk/Handlers/Download.ashx?IDMF=8683fd98-b697-47dc-b387-14ad6e777338 | HS/25 - INQ000281077 |

⁵⁸ UK, G. (2021). Forced Marriage Unit statistics 2020. [online] GOV.UK. Available at: <a href="https://www.gov.uk/government/statistics/forced-marriage-unit-statistics-2020/forced-marriage-unit

and restrictions on weddings and travel. In 2021, FMU dealt with 337 cases on forced marriage and FGM (316 solely on forced marriage) and 868 enquires on these issues – so there was an overall increase to 1,205 (HS/49).⁵⁹

Summary of actions that ought to have been taken

159. SBS suggests four key areas for improvement:

- Review and reform of the policies outlined above that have a harmful and disproportionate impact on women, in particular those from black and minority ethnic communities and migrant women with insecure immigration status and NRPF;
- ii. Consultation with expert organisations during emergency and resilience planning;
- iii. Inclusion of the Domestic Abuse Commissioner and Victim's Commissioner in all relevant planning and co-ordination groups
- iv. Engaging existing expertise and resources to provide meaningful protections for migrant women.
- 160. SBS make these suggestions as those which present most prominently in our work, though this list should not be considered exhaustive. SBS also support those made by SWA and the wider VAWG sector in the response to call for evidence. On-going actions required from Government were also highlighted by SBS in its' response to Home Office's consultation on the national Violence against Women and Girls Strategy Call for Evidence in Feb 2021 (HS/50). HS/50 INQ000281105

⁵⁹ GOV.UK. (n.d.). Forced Marriage Unit statistics 2021. [online] Available at: https://www.gov.uk/government/statistics/forced-marriage-unit-statistics-2021/forced-marriage-unit-statistics-2021#:~:text=ln%202021%2C%20251%20cases%20(74. HS/49 - INQ000281103

Review and reform of policies that have a harmful and disproportionate impact on women, in particular those from black and minority ethnic communities and migrant women with insecure immigration status and NRPF

- 161. The specific vulnerabilities and barriers that women from black and ethnic minority communities and migrant women with insecure immigration status face pertaining to gender based violence should have informed the government's pandemic planning and emergency preparedness. This includes the end of the hostile environment and a review and reform of policies discussed above, such as:
 - a. Public sector data-sharing of immigration enforcement data
 - b. NHS Charging Regulations and section 39 Immigration Act 2014
 - c. Public-spending cuts from 2010 onwards
 - d. No recourse to public funds conditions. At the very least, the DDVC and the DVILR should be extended to all migrant victims of domestic abuse.

Consultation with expert organisations during emergency and resilience planning

162. Co-working between specialist organisations and government on a pandemic response would enable forward-thinking on protection and provision for those SBS support. This would benefit central government decision-making, but also the decisions of public bodies in general. As those SBS supports have overlapping-issues, 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 SBS and similar experts on national plans for a pandemic. Now the Government has the opportunity to consult with SBS to learn lessons for the handling of any future pandemic – we hope this opportunity will be used to its fullest.

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

163. SBS understands 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, SBS's position is that an expert in PSED and intersectionality should be brought on-board to scrutinise the planning and preparedness of the government before and during crucial periods of the pandemic.

Planning for emergency allocation of extra resources to frontline organisations, public services and local authorities in-line with government decision making

- 164. At the beginning of the pandemic, SBS's existing staff had to absorb the substantive extra workload which came with the increase in domestic abuse many suffered burnout as a result. We were only able to hire the much-needed extra staff in the latter half of 2020, when emergency funding became available. The need for extra resources arose from the pandemic, but also from government decision-making in that government had failed to anticipate and plan for the rise in domestic abuse (HS/51). Yet, the government did not provide extra resources and funding to organisations like SBS at a time when they were relied on to continue providing vital services. In the future, funds should be made available to frontline organisations as soon as government has knowledge of an impending public health crisis to allow them to quickly expand services in said crisis.
- 165. SBS deal with local authorities and public services on a daily basis through their casework. It is as a result of this experience, we say the question of sufficient funding must be extended to these bodies, if survivors are to be properly considered. The pandemic arrived after a long period of austerity in which public services and local authorities were starved of resources. Prior to the pandemic, survivors supported by SBS routinely struggled to access safe and secure housing. Survivors struggled to access immigration services, health services, social services, welfare provisions and the justice system. These existing problems, relating to systemic underfunding, do not appear to have been considered in government decision-making leading to an escalation of these issues during the pandemic.

HS/51 - INQ000281106

Monitoring, working with and learning from the international community during a public health crisis.

166. Strong ties and communication with the international community should have been present throughout government decision-making prior to the pandemic. This would have benefitted those who SBS support by providing support services in both the public and charity sector with greater expertise on how to support VAWG survivors during times of crises, and in particular in response to the global Covid-19 pandemic. It is SBS's view that, should there be a future pandemic, analysis and greater communication with the international community would benefit government decision-making, and crucially, the women and girls they support.

Conclusion

167. For the reasons set out in this statement, SBS does not believe that those they support were adequately considered when the UK Government was making decisions about the pandemic. The Government failed to anticipate or plan for the inevitable increase in domestic abuse, failed to consult them or any other by and for specialist organisations led by black and ethnic minority women, failed to properly fund services responding to the rise in domestic abuse, failed to consider pre-existing inequalities and the impact of the hostile environment on migrant survivors of abuse, and failed to mitigate against the hardship suffered by those with NRPF during the pandemic. There was no clear messaging so that survivors knew they could leave their homes and what avenues would be open to them to seek support. The Government also failed (and has continued to fail) to consider the long term impact that the pandemic would have on survivors and the specialist services that are set up to support them.

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.	
	Personal Data
Signed:	
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Dated: ____22/09/2023____