

## **THE UK COVID-19 INQUIRY**

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### **TRADES UNION CONGRESS: WRITTEN SUBMISSIONS FOR PRELIMINARY HEARING IN MODULE 10, ON 4 NOVEMBER 2025**

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#### **INTRODUCTION**

1. These are the submissions of the Trades Union Congress ('the TUC') for the preliminary hearing on 4 November 2025 in Module 10 of the UK Covid-19 Inquiry ('the Inquiry').
2. The TUC brings together over 5 million working people who make up its 48 unions. In this Inquiry the TUC aims to give voice to working people, and to shine a light on the specific impacts faced in the workplace during the Covid-19 pandemic.
3. These submissions address:
  - a. Approach to the module;
  - b. Expert reports.
4. We welcome in Counsel to the Inquiry's note in advance of the preliminary hearing ('CTI's Note') and the list of issues the clear intention to learn lessons and retain a forward-looking focus on what can be changed so as to reduce negative impacts on the workforce, and wider society, in the next pandemic.

#### **APPROACH TO THE MODULE**

5. It is apparent from CTI's Note that the module will not be examining decisions made which impacted society, and those at work, notwithstanding that there are significant matters which have not been addressed in any earlier module. That includes, for example, decisions made in respect of those in construction, transport workers, food processing, and in other areas. It means, therefore, that the Inquiry will not be considering decision making (as opposed to impact) in respect of some of those occupations that faced high mortality rates during the

pandemic. Indeed, not only is the Inquiry not examining decisions made, it is not seeking evidence from responsible government departments and agencies.

6. That is a matter of a regret to many of the TUC's affiliated unions, not least because issues have been considered outside of earlier modules on the basis that they would fall within Module 10. Other 'impact' modules – such as Module 8, focussing on children and young people – have, in order to be meaningful, engaged in examination of the decisions made.
7. That said, it is recognised that there may, nonetheless, be considerable value in illuminating broad impacts across society, including on those at work. It is also recognised that imperatives to conclude the Inquiry in a proportionate and timely manner are also important.
8. The TUC does not, therefore, make any submission which seeks to dissuade the Inquiry from adopting an approach focused on impact. Two submissions are made which seek to assist the Inquiry in achieving a meaningful module, but which does justice to the breadth of impact on those at work, whilst not extending the current scope of the module.
9. First, the reports of earlier modules must very much be considered as part of the evidence in Module 10 for the purposes of being able to set the impact within the context of the decisions made in the pandemic. Core participants must also be entitled to give evidence, and make submissions as to, not only the impacts of the pandemic, but how it is felt that such impacts ought to have been mitigated in the pandemic, and may be mitigated in the next. Inevitably, some of the evidential picture will be incomplete, and that can be appropriately acknowledged in the report, but excluding all evidence as to decision making risks emptying the module of meaning.
10. Second, there should be oral evidence from a breadth of unions. We note the indication in CTI's Note that: *'Module 10 will circulate a Provisional List of Witnesses and timetable and further details about the Rule 10 process after the second preliminary hearing'* (para. 40). One of the four areas of focus for the module is key workers. The provisional outline of scope of the module says:

*'Module 10 will therefore examine the impact of the pandemic and the measures put in place on:*

*1. The general population of the UK including the impact on mental health and wellbeing of the population. [...]*

*2. Key workers, excluding health and social care workers, but including those working in the police service, fire and rescue workers, teachers, cleaners, transport workers, taxi and*

*delivery drivers, funeral workers, security guards and public facing sales and retail workers. It will cover:*

- *The impact of implementing government decisions*
- *Any inequality in the impact of interventions, including lockdown, testing and workplace safety*
- *Any inequality in the impact on health outcomes, such as infections, mortality and mental and physical wellbeing.*

*3. The most vulnerable, including those outlined in the Inquiry's Equalities Statement as well as the clinically vulnerable and clinically extremely vulnerable.*

*4. The bereaved, including restrictions on arrangements for funeral and burials and post-bereavement support'.<sup>1</sup>*

11. We note that the list of roles set out at (2) above is not exhaustive.

12. The draft list of issues sets out in respect of key workers:

*'14. Key Workers*

*a. How did the pandemic and measures introduced in response to the pandemic impact on the health outcomes (such as infections, mortality and physical and mental wellbeing) of different types of key workers?*

*b. How did the pandemic and measures introduced in response to the pandemic impact on the working life (including workplace safety, workplace mortality, and work burdens) and on the family and private lives of different types of key workers?*

*c. How did key workers experience government restrictions and guidance in their roles (and how did they respond to those restrictions)?'.*

13. Having considered the list of the Rule 9 requests made and the expert reports thus far disclosed, we note that the evidence on key workers is not expansive. There are reflections on the relation between occupation and other characteristics such as socio-economic disadvantage and racial inequalities in the reports disclosed, but the exposition of evidence relevant to the impact of the pandemic on key workers is not significant. Furthermore, of the recipients of the 39 Rule 9 requests made in this module, the TUC is the only witness who appears likely to provide significant evidence on this area. We note the indication that, in this

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<sup>1</sup> For ease of reference: <https://covid19.public-inquiry.uk/wp-content/uploads/2024/10/31103610/Module-10-Provisional-Outline-of-Scope-in-English.pdf>.

module, the reports of previous modules, the products of the roundtable events, the Systematic Evidence Review, and Every Story Matters will feed into the module. Nonetheless, the TUC is doing a lot of the ‘heavy-lifting’ in that respect. There is no complaint about that: it speaks to the TUC’s very purpose, including its reason for seeking to contribute to this Inquiry. However, the breadth and importance of the issues is such that seeking to cover all matters via a single witness is unlikely to be the most effective way of adducing evidence.

14. The TUC would wish to work with the Inquiry team to identify those signatories to the (draft) TUC statement, who would be able to address the necessary sectors/roles identified in the provisional outline of scope, as well as: local government, manufacturing (including food manufacturing, which we have previously highlighted as an occupation which suffered disproportionate impacts in terms of infection and severe disease), energy industry, pharmaceuticals, logistics (encompassing delivery drivers but also lorry drivers), shipping, offshore workers, and warehousing and distribution workers. This could be achieved by calling one witness from each of four or five unions, across a blend of general unions and sector-specialist unions. We could co-ordinate the witnesses such that they could give evidence as a panel in a single evidence session.

## EXPERTS

15. In our submissions to the first preliminary hearing, we set out as follows:

*‘The outsourcing and sub-contracting of workers was a major determinant of experiences and outcomes during the pandemic for low paid key workers, because they were on terms and conditions which exposed them to greater risk and placed them outside of collectively agreed procedures, and functional health and safety structures. In transport, for example, RMT estimates that there are at least 10,000 outsourced workers in roles such as cleaning, catering and security functions, as well as some station roles. RMT found in April 2020 that only 10% of cleaners reported that they had received any PPE, compared with 44% of traincrew and 38% of station staff.<sup>2</sup> We consider that expert evidence should consider the impact of outsourced and agency work upon key workers, and the role this may have played in terms of inequality of impact. Concrete, practical recommendations as to the protections to be put in place in a future pandemic for agency and outsourced workers may be one area in which the Inquiry can tackle inequality of impact head on’.<sup>3</sup>*

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<sup>2</sup> RMT Covid-19 Survey 15-17 April 2020.

<sup>3</sup> See: <https://covid19.public-inquiry.uk/wp-content/uploads/2025/02/18173837/2025-02-05-M10-written-submissions-for-preliminary-hearing-Trades-Union-Congress.pdf>, at p.6, para. 14.

16. We have now considered the draft reports of the experts to give evidence to this module, including the reports of Professors Marmot and Bambra, and of Professors Nazroo and Becares. We do not consider that the expert evidence in this module grapples with the issue of the impact of outsourcing and sub-contracting in terms of determining the experiences of many key workers during the pandemic. We invite the Inquiry to seek expert evidence on this topic from either: (a) expert witness(es) already instructed in this module; or (b) further expert witness(es) not yet instructed to provide a report to this module. If the Inquiry were to seek evidence from existing experts, we consider that Professors Marmot and Bambra, and Professors Nazroo and Becares would be in the best position to assist. Should the Inquiry be minded to obtain a report from another expert, the TUC would be in a position to propose a short list of potential expert witnesses.

## **CONCLUSION**

17. The TUC is grateful for the opportunity to comment upon the items set out in CTI's Note and looks forward to further assisting the Inquiry in Module 10.

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22 October 2025