**IN THE UK COVID-19 PUBLIC INQUIRY**
**BEFORE BARONESS HEATHER HALLETT**

**IN THE MATTER OF:**

**THE PUBLIC INQUIRY TO EXAMINE THE COVID-19 PANDEMIC IN THE UK**

**MODULE 10**

---

**SUBMISSIONS ON BEHALF OF**

**SOUTHALL BLACK SISTERS, SOLACE WOMEN'S AID AND**

**LATIN AMERICAN WOMEN'S RIGHTS SERVICE**

**"THE DA GROUP"**

**SECOND PRELIMINARY HEARING**

**4 NOVEMBER 2025**

---

## Introduction

1. Southall Black Sisters (SBS), Solace Women's Aid (SWA) and Latin American Women's Rights Service (LAWRS) are grateful for their designation as Core Participants. They are represented jointly by Public Interest Law Centre and counsel and are collectively referred to as "the DA Group".

2. Their interest in the Inquiry, and specifically in Module 10, is in respect of all of the areas identified in the Provisional Outline of Scope, but particularly in relation to:

    - The impact on frontline key workers in the VAWG sector, including how they continued to assist victim-survivors despite not being initially recognised as key workers, the adaptations they were required to make, the resulting burnout, stress and increased workload they experienced, and the impact on their mental health and wellbeing.
    - Access to domestic abuse services during the pandemic, including the emergency accommodation crisis (reduced refuge capacity while demand increased dramatically), statutory services moving to online-only provision, and safeguarding challenges arising from service disruption across housing, healthcare, police response, and the civil and criminal justice systems.

- The compounded vulnerabilities of victim-survivors related to insecure housing, poverty, mental and physical health, and disability, with particular focus on the disproportionate impact on Black, minoritised and migrant women, including those with insecure immigration status (particularly those with No Recourse to Public Funds ("NRPF") who faced exclusion from emergency support despite increased vulnerability).
- The long-term mental health and trauma impacts on victim-survivors and their children, compounded by reduced statutory mental health services during a period of increased demand.
- How lockdown and other NPIs intensified domestic abuse patterns, with perpetrators exploiting pandemic restrictions as tools of control, government messaging creating confusion about victim-survivors' rights to leave their home, and enforced confinement eliminating opportunities to escape unsafe situations.
- The distinct yet interrelated impacts of the virus itself and lockdown measures, recognising that perpetrators exploited fears of infection as additional tools of control and coercion.
- Lessons to be learned for future emergency preparedness in protecting vulnerable groups.

**Counsel to the Inquiry's Note for the Preliminary Hearing**

***List of Issues (paragraph 16 of Module 10: List of Provisional Issues)***

3. We welcome the list of issues set out at paragraph 16 and consider them wide enough to address many of the matters at paragraph 2 above. We also note that the list of issues is not fixed and will evolve as the Inquiry considers the evidence and the lessons that may be learned for the future.

4. In order to adequately reflect the intersectionality of domestic abuse, we suggest that the Chair specifically identify '*victim-survivors with insecure immigration status and those with protected characteristics*' within the list of issues.

5. While the current list includes consideration of the immigration and asylum system, this focuses on immigration processes, decisions, and detention rather than the specific barriers faced by those with insecure immigration status. For example, women with NRPF faced a unique vulnerability during the pandemic, experiencing

abuse, facing homelessness, and being explicitly excluded from emergency support and accommodation despite increased need. The emergency funding provided by Government specifically excluded women with NRPF, compounding existing structural inequalities. More broadly, the continuation of 'hostile environment' policies during the pandemic – including data-sharing between public services and immigration enforcement, NHS charging and reporting mechanisms, Right to Rent and employer checks and restrictions on access to essential services – created additional barriers that deterred migrant women from seeking help or leaving abusive situations. The fear of immigration consequences effectively trapped many victim-survivors with their abusers. Without explicit reference to insecure immigration status and the wider impact of immigration policies within the domestic abuse thematic issues, there is a risk that the distinct and disproportionate impact on this group of victim-survivors will not be adequately examined.

***Rule 9 Requests (paragraphs 9 -13 of the CTI Note)***

6. The DA Group welcomes the inclusion of a wide and diverse range of organisations that have been invited to provide Rule 9 responses.

7. While we understand that few, if any, additional Rule 9 requests are anticipated, we note that the organisations listed at paragraph 24 of the CTI's note are not well placed to assist the Chair with considerations relating to the Justice Sector and the impact of the pandemic upon it.

8. The organisations within the DA Group are aware that some of their service users have faced significant challenges in engaging solicitors – particularly those working within the Legal Aid framework – and in navigating family, housing, or criminal proceedings arising from their experiences as victim-survivors of domestic abuse. While the DA Group can offer some insight through case studies, they do not act as legal representatives for victim-survivors within the justice system and therefore cannot provide direct evidence of the day-to-day challenges faced by practitioners representing victim-survivors seeking Occupation Orders, Non-Molestation Orders, or other remedies through the Family, Criminal, or County Courts. Similarly, they are not able to provide first-hand evidence of the pandemic's impact on access to justice.

9. We therefore respectfully reiterate the DA Group's suggestions, as set out in our submissions dated 11 September 2025, that the Chair consider obtaining Rule 9 statements from the Family Law Bar Association and the Legal Aid Practitioners Group. Doing so would assist the Chair in addressing the matters identified at paragraph 19 of the Provisional List of Issues.

***Expert evidence***

10. The Chair has sought expert evidence from a number of experts to address key issues under consideration in Module 10, including matters relating to gender inequalities, mental health, older people, disability, racial and ethical inequalities and geographical, socio-economic and health inequalities.

11. The DA Group has provided comments on the draft expert reports, highlighting the relevance of issues affecting women and victim-survivors of domestic abuse within each expert's area of focus, and emphasising the need to address the intersectionality of vulnerable groups and individuals with protected characteristics. It is likely that other Core Participants in Module 10 have similarly raised points relevant to their particular area of interest.

12. However, rather than each expert considering the observations and comments in isolation, the DA Group believes there would be considerable value in the experts engaging collectively to discuss some of the issues raised in the Core Participants' comments – potentially through a dedicated meeting or roundtable discussion.

13. The Chair has recognised the benefit of roundtable discussions in this Module and has organised a series of roundtable events with a range of organisations. We consider that a similar approach can be adopted during any discussions had by the experts and when seeking to address comments and observations from the wide range of Core Participants on the broad range of issues in Module 10.

14. We appreciate that some experts reports have already been finalised. However, there remains significant value in convening such discussion to explore how the issues interrelate across different areas of expertise, rather than treating them in isolation. This would enable a more holistic understanding of the compounded and intersecting impacts experienced by vulnerable groups, including domestic abuse victim-survivors, during the pandemic.

***Oral witness evidence***

15. We look forward to receiving a Provisional List of Witnesses and timetable, as well as further details about the Rule 10 process, following the second preliminary hearing.

16. The DA Group remains available to be called to give oral evidence at the public hearings. We believe this would provide valuable insight into the lived experiences of domestic abuse victim-survivors during the pandemic, the challenges faced by frontline VAWG workers, and the systemic failures in safeguarding and support provision. Oral testimony would enable the Inquiry to hear directly about the compounded impacts on marginalised communities, including the specific barriers faced by women with insecure immigration status and those with protected characteristics, and would inform meaningful recommendations for future emergency preparedness.

Liz Davies KC
Marina Sergides
Garden Court Chambers
On behalf of the Public Interest Law Centre
21 October 2025