



Counsel to the Inquiry's Note for the second Preliminary Hearing in Module 10 of the UK Covid-19 Inquiry on Tuesday 4 November 2025

Introduction

1. The purpose of this Note is to introduce the issues and agenda for the second preliminary hearing in Module 10 of the Covid-19 Inquiry on **4 November 2025**. The first preliminary hearing was held on 18 February 2025.
2. Those who have been granted Core Participant status in Module 10 have been provided with monthly solicitor progress updates. However, this preliminary hearing is an opportunity to draw this information together and ensure that it is up to date, as well as allowing a public update on the Inquiry's work so far in Module 10, and on planning for the upcoming public hearing.
3. Any brief written submissions from Core Participants in response to this Counsel Note should be received by 4pm on **21 October 2025**.

Agenda

4. The agenda for the preliminary hearing in Module 10 is as follows:
 - a. Update from Counsel to the Inquiry, regarding:
 - i. Disclosure to Core Participants and approach to Investigation
 - ii. Systematic Evidence Review
 - iii. Expert reports
 - iv. Roundtable events
 - v. Every Story Matters
 - vi. Rule 9 requests
 - vii. Provisional Outline of Scope, List of Issues and Draft Factual Chronology
 - viii. Approach to the Hearing
 - ix. Public Hearing Dates
 - b. Submissions from Core Participants.

Disclosure to Core Participants and approach to Investigation

5. As at the date of this Note, Module 10 has disclosed 719 documents to Core Participants for their consideration. The latest tranche was delivered on 2 October 2025. This process continues and Module 10 intends that disclosure will be completed in good time to allow preparation for the substantive hearing.
6. As was explained at the first preliminary hearing and in regular updates, Module 10's investigation will draw information and evidence from a range of sources, including roundtable events, experts appointed by the Inquiry, witness statements, review of existing research and publicly available material including statistical information and individual experiences as captured by Every Story Matters. Further updates are provided below regarding each of these.

Systematic Evidence Review

7. The Inquiry instructed the Centre for Strategy and Evaluation Services to conduct a Systematic Evidence Review concerning the impact of the pandemic on the mental health of the UK adult population.
8. Significant progress has been made with the review and a final draft has been considered by the Inquiry team. It is anticipated this will be disclosed to Core Participants ahead of the second preliminary hearing.

Expert material and the instruction of expert witnesses

9. Significant progress has been made in respect of the instruction of the experts and receipt of the draft expert reports. A number of draft expert reports have now been shared with Core Participants, who have provided comments, and the process of finalising expert reports for disclosure to Core Participants continues.
10. In Module 10, in addition to the Systematic Evidence Review, the Inquiry has instructed the following experts:
 - a. **Professor Jay Das-Munshi and Professor David Osborn:** Professors Das-Munshi and Osborn have been instructed, respectively, to consider the impact of the pandemic on people living with severe mental illness and the provision of and access to mental health services for those individuals. Both reports have been disclosed to Core Participants in draft and comments considered. Final revisions are in progress for review by the Inquiry and it is anticipated that their reports will be disclosed to Core Participants shortly after the second preliminary hearing.
 - b. **Professor James Nazroo and Professor Laia Becares:** Professors Nazroo and Becares have been instructed to consider the impact of the pandemic on racial and ethnic inequalities across the UK. It is anticipated that a draft report

will be circulated to Core Participants for comment before the second preliminary hearing.

- c. **Professor James Nazroo:** Separately, Professor Nazroo has been instructed to consider the impact of the pandemic on older people. Professor Nazroo's draft report was circulated to Core Participants for comment in late September 2025 and these are in the process of being considered by the Inquiry and expert.
 - d. **Dr Clare Wenham:** Dr Wenham has been instructed to report on the impact of the pandemic on gender inequalities. Dr Wenham is preparing her final report and it is anticipated that the final report will be disclosed to Core Participants before the second preliminary hearing.
 - e. **Professor Laia Becares:** Professor Becares has been instructed to report on the impact of the pandemic on LGBTQ+ people. A draft report was disclosed to Core Participants for comment in August 2025 and these are in the process of being considered by the Inquiry and expert. It is anticipated that the final report will be disclosed prior to the second preliminary hearing.
 - f. **Professor Tom Shakespeare and Professor Nicholas Watson:** Professors Shakespeare and Watson have been instructed to report on the impact of the pandemic on disabled people and clinically vulnerable individuals. A draft report was circulated to Core Participants for comment in September 2025 and these are in the process of being considered by the Inquiry and expert.
 - g. **Professor Michael Marmot and Professor Claire Bambra:** Professors Marmot and Bambra have been instructed to report on the impact of the pandemic on geographical, socio-economic and health inequalities. It is anticipated that a draft report will be circulated to Core Participants for comment before the second preliminary hearing.
11. The Inquiry is grateful to all Core Participants for their prompt and careful consideration of the draft expert reports. The comments of all Core Participants received to date have been considered by the Inquiry, communicated to the experts where appropriate and further work has been done by the experts relevant to the Inquiry's investigation in this Module.
12. The Inquiry has been separately invited by the CVF Core Participant group to instruct Professor Azeem Majeed and Professor Claire Herrick to provide expert evidence on the experience of clinically vulnerable and clinically extremely vulnerable people. The Inquiry considers that the evidence of Professors Shakespeare and Watson, taken together with the evidence provided in response to the CVF Rule 9 request and publicly available material, will be sufficient to inform the Inquiry's investigation of the matters in scope. However, in consideration of the totality of the evidence, the Inquiry has directed a Rule 9 request to both Professor Majeed and Professor Herrick in terms designed to elicit any information they may wish to share within their own

knowledge and experience, beyond their published research and commentary. The Inquiry will consider the responses to these requests.

13. The Inquiry does not anticipate issuing any further expert instructions for Module 10. However, a request to consider the instruction of a migration expert has recently been received from the Migrant Rights Consortium (“MRC”) which is being considered.

Roundtable events

14. Module 10 has held a series of roundtable events with the aim of understanding the impact of the pandemic from a range of organisations. These roundtables were facilitated by Ipsos on behalf of the Inquiry.
15. The roundtables conducted since the first preliminary hearing are as follows:
 - a. Faith groups and places of worship (20 February 2025);
 - b. Unions and other organisations representing key workers (25 March 2025);
 - c. Safeguarding and support for victims and survivors of domestic abuse (2 April 2025);
 - d. Funeral, burials and post-bereavement support (24 April 2025);
 - e. Prisons and other places of detention and those affected by the operation of the justice system (7 May 2025);
 - f. Hospitality, retail, travel and tourism industries (13 May 2025);
 - g. Community level sport and leisure (21 May 2025);
 - h. Cultural institutions (27 May 2025); and
 - i. Housing and homelessness (3 June 2025).
16. The preparation of summary reports for each roundtable continues. These reports, along with the other evidence collected, will inform the Chair’s investigation and findings.
17. Reports of the following roundtables have been disclosed to Core Participants and we are grateful to those who have attended roundtables:
 - a. Religious leaders and places of worship: disclosed on **2 July 2025**
 - b. Domestic abuse and safeguarding: disclosed on **30 August 2025**
 - c. Funerals, burials and bereavement support: disclosed on **2 October 2025**
18. The remaining reports will be disclosed to Core Participants in due course and by the end of 2025. We anticipate further summary reports will be disclosed prior to the date of the second preliminary hearing.

Every Story Matters

19. Since the first preliminary hearing, considerable work has been conducted on the Every Story Matters records for Module 10. There will be separate records covering

what the Inquiry has been told about mental health and wellbeing impacts, the impact on key workers and the impact on bereavement.

20. Members of the public were invited to complete an online form via the Inquiry's website (paper forms were also offered to those who wished to contribute) between November 2022 and May 2025. The responses to the forms were submitted anonymously. We also held public events in towns and cities across the UK to enable people to share their experience, in person, in their local area. For Module 10, webform stories, events stories, and some targeted research interviews across England, Scotland, Wales and Northern Ireland have been analysed in the preparation of the Every Story Matters records.
21. A number of additional events have contributed to the Every Story Matters bereavement record. In January 2025, the Every Story Matters team held three consultative workshops with bereaved people who helped to design a series of Listening Events. Six Listening Events were held between May and June 2025 with bereaved families across the UK. This included three online events and three in-person events. These events allowed bereaved people to share their experiences of bereavement during the pandemic, the impact on burials and end of life ceremonies, accessing bereavement support and learning for the future. Targeted interviews were also conducted with a number of bereaved people for the bereavement record. We are grateful to those Core Participants who have supported the recruitment of bereaved people to attend these events.
22. Final records from this process will be disclosed to Core Participants. It is anticipated that this will be after the second preliminary hearing and before the end of 2025.

Rule 9 Requests

23. The Inquiry has now issued a total of 39 formal requests for evidence, pursuant to Rule 9 of the Inquiry Rules 2006.
24. The Rule 9 requests made include:
 - a. Office of National Statistics
 - b. Northern Ireland Statistics and Research Agency
 - c. National Records of Scotland
 - d. Local Government Association (LGA), Welsh Local Government Association (WLGA), Convention of Scottish Local Authorities (COSLA)
 - e. Northern Ireland Local Government Association (NILGA)
 - f. Clinically Vulnerable Families (CVF)
 - g. Covid Bereaved Families for Justice (CBFFJ)
 - h. Covid Bereaved Families for Justice Cymru (CBFFJ Cymru)
 - i. Covid Bereaved Families for Justice Northern Ireland (NI CBFFJ)
 - j. Scottish Covid Bereaved (SCB)
 - k. UK Commission on Bereavement
 - l. Mind

- m. Scottish Action for Mental Health (SAMH)
- n. Scotland's Mental Health Partnership
- o. Association of Mental Health Providers
- p. Inspire Wellbeing
- q. Homeless Connect
- r. The Good Things Foundation
- s. FaithAction
- t. Arts Council England
- u. Arts Council Wales
- v. Arts Council Northern Ireland
- w. Creative Scotland
- x. Sport England
- y. Sport Wales
- z. Sport Scotland
- aa. Sport Northern Ireland
- bb. Trades Union Congress (TUC)
- cc. Disabled People's Organisations (DPO)
- dd. Domestic Abuse Group (The DA Group)
- ee. HM Inspectorate of Prisons
- ff. Prison Reform Trust (PRT)
- gg. Howard League
- hh. Migrants' Rights Consortium (MRC)
- ii. Shelter
- jj. Shelter Cymru
- kk. Joseph Rowntree Trust
- ll. Professor Azeem Majeed
- mm. Professor Claire Herrick

25. The Inquiry is grateful to recipients of Rule 9 requests for the efforts they have made to comply with the Inquiry's requests in a timely manner.
26. As at the date of this Note, 25 draft witness statements have been received and are either being reviewed with a view to the giving of feedback, or for confirmation as to finalisation by signature. At the time of writing, eight final statements have been disclosed to Core Participants.
27. While the Inquiry will continue to consider the evidence provided in the responses to existing Rule 9 requests and submissions by Core Participants, it is not anticipated that many, if any, further Rule 9 requests will be required. The Inquiry's approach to evidence gathering in Module 10 has included reports of roundtable events, expert reports, the Systematic Evidence Review and Every Story Matters, as outlined above thereby requiring substantially fewer Rule 9 requests than were made in previous modules. However, where the Inquiry considers that matters have not been explained or addressed sufficiently in the evidence gathered, including but not limited to the response to Rule 9 statements - or in publicly available research, statistics and other material - or where the Inquiry's review of material received gives rise to further questions or areas for investigation, additional requests will be made.

28. Monthly updates have been provided to Core Participants on the requests issued and progress made. These will continue. It remains the Inquiry's approach that Core Participants will not be provided with copies of Rule 9 requests. They will, however, continue to be kept properly informed through the monthly Module 10 update notes and they will receive copies of the evidence and disclosure generated by the requests.
29. It is anticipated that a number of final witness statements and exhibits will have been disclosed to Core Participants by the date of the second preliminary hearing.

Provisional Scope, List of Issues and Draft Factual Chronology

30. A document outlining the provisional scope for Module 10 was published in September 2024.
31. In a further development of the Provisional Outline of Scope for the Inquiry's investigation, a draft list of issues to all Core Participants is circulated with this note, for consideration and comment.
32. The list of issues sets questions in the context of the Provisional Outline of Scope. It further seeks to identify overarching issues emerging from the evidence available to the Inquiry in this Module (and mirroring the evidence in earlier modules as to the impact of the pandemic and measures in response).
33. Module 10 will examine whether there were shared experiences and common factors which may have acted to exacerbate or alleviate the impact on individuals or groups across the pandemic period. Some provisional common themes and issues are identified in the list of issues. This list is not fixed and will evolve as the Inquiry considers the evidence and considers where lessons may be learned for the future. For the purposes of the preparation for the upcoming hearing, the overarching issues identified from the emerging evidence include, but are not limited to:
- a. Unequal impacts: To what extent was the impact of the pandemic unequal, whether by reference to protected characteristics, socioeconomic status, geography, health status (including clinically vulnerable and clinically extremely vulnerable people) and other demographic disparities or factors?
 - b. Digital expansion or exclusion: To what extent did access to digital technologies affect the impact of the pandemic across all identified areas of scope?
 - c. Data and learning: To what extent are there gaps in the data and research available which may shape how the UK might understand and learn from the impact of the pandemic and the measures introduced in response across all identified areas of Scope?
 - d. Lasting impacts: To what extent have there been lasting impacts across all of the identified areas of Scope as a result of the pandemic or measures put in place in the period defined by the Inquiry's terms of reference (including changes to

behaviours, community practices, service models and social or economic conditions which operated to reduce the impact of the pandemic). How have these affected people's lives and what lessons might be learned from those impacts for the future? While the Inquiry is not considering decisions or events outside the pandemic period as defined by its terms of reference, Module 10 may consider the longer lasting impact of the pandemic and measures taken in response during that period.

34. The societal impact of the pandemic was profound and far reaching, altering almost every aspect of daily life in the UK. As emphasised at the first preliminary hearing, the scope of this Module must focus directly on the impact of the pandemic and the measures taken in response. Earlier modules have considered at length evidence on the process for decision making and have closely scrutinised decisions taken during the pandemic period. By the time of the public hearing in this Module (and by the time this Module reports), the Inquiry's findings and recommendations in many of those earlier modules will be available for consideration. It will be outside the scope of this Module to further examine or question decision-making in any of the four areas of scope identified. However, this Module will proceed with an appreciation of the findings and recommendations of earlier modules.
35. The Provisional Outline of Scope and the draft list of issues have both been drawn widely to provide a broad base for the Inquiry's investigation.
36. Not all of these issues will necessarily be considered in the course of the public hearing in this Module.
37. The Inquiry will be required to focus on areas from which the narrative of the pandemic's impact can be clearly drawn and where there may be lessons to learn for the future, including in respect of risk factors for adverse impact or positive steps which might be taken to alleviate impact in the face of a future pandemic or civil emergency.
38. In order to place the evidence of impact being considered by the Inquiry in this Module in context, a draft factual chronology of key events has been circulated to Core Participants for comment together with this note. These events may have been examined in detail by the Inquiry in other modules. For the purposes of this Module, the timing of key events may be critical to a clear understanding of the impact of the pandemic at different times during the pandemic period.
39. The scope of this Module will necessarily be reflected in the approach of the Inquiry to findings. The Inquiry anticipates that Module 10's report will provide insight into the impact on society in the UK of the pandemic and the measures taken in response. It will not focus on individual decisions or the process of decision making, but on the future and any lessons learnt from the human experience of this pandemic.

Approach to the Hearing

40. Module 10 will circulate a Provisional List of Witnesses and timetable and further details about the Rule 10 process after the second preliminary hearing.

41. Counsel to the Inquiry (“CTI”) will make an Opening Statement at the commencement of the public hearing. It is unlikely that CTI will deliver a Closing Statement. Oral evidence will not be heard on every aspect of scope or on every issue on which written evidence is received.
42. Those Core Participants who wish to make Opening and Closing Statements will, of course, be permitted to do so. However, CTI will be inviting the Chair to impose strict time limits. This is likely to be determined, in part, by the number of participants. Written statements must be submitted to the Inquiry within a time frame which will be set out in due course.

Future Hearing Dates

43. The Inquiry does not anticipate holding a further preliminary hearing for Module 10 before the start of the public hearing.
44. The public hearing in Module 10 will take place between 16 February 2026 to 5 March 2026.

7 October 2025

Counsel to the Inquiry

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