

THE PUBLIC INQUIRY TO EXAMINE THE COVID-19 PANDEMIC IN THE UK:  
MODULE 10

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OPENING SUBMISSIONS ON BEHALF OF  
SOUTHALL BLACK SISTERS, SOLACE WOMEN'S AID AND  
LATIN AMERICAN WOMEN'S RIGHTS SERVICE  
"THE DA GROUP"

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1. These submissions are on behalf of Southall Black Sisters ("SBS"), Latin American Women's Rights Services ("LAWRS") and Solace Women's Aid ("SWA"), the latter represented pro bono. They instruct Public Interest Law Centre ("PILC") and are referred to as the "DA Group".

**A. INTRODUCTION**

2. The Chair has already found that Government's response to the pandemic was "*too little too late*", "*February 2020 was a lost month*" and the "*failure to appreciate the scale of the threat, or the urgency of response it demanded, meant that – by the time the possibility of a mandatory lockdown was first considered – it was already too late, and a lockdown had become unavoidable. That these same mistakes were repeated later in 2020 is inexcusable.*"<sup>1</sup> She also found "*it was ...foreseeable that, during a period of lockdown, abuse within the home would, in all likelihood, increase. Equally, a lockdown made it much more likely that such abuse would go undetected.*"<sup>2</sup> She concluded "*it should not have required the first lockdown to demonstrate that these risks would materialise. The UK government should have assumed that the implementation of a lockdown would expose significant numbers of women and children to violence and abuse, in circumstances where these would be harder to detect, harder to seek support for and easier to hide. Clear consideration ought to have been given to the numbers of people already known to be at risk of violence or other forms of abuse in their homes, and plans made to mitigate them.*"<sup>3</sup>
3. The DA Group welcomes the opportunity in M10 to provide further evidence, in addition to that provided in M2, on the impact on victim-survivors. In contrast to the high-level "*core decision-making and political governance*" in M2, M10's focus on the impact on the most vulnerable members of society gives the Inquiry the opportunity to make recommendations as to how, in future pandemics, public authorities at all levels can plan,

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<sup>1</sup> Rt Hon the Baroness Hallett DBE Chair of the UK Covid-19 Inquiry, *Modules, 2, 2A, 2B, 2C report: Core decision-making and political governance*, November 2025 [Publicly available] ("**M2 Report**"), Vol 1, Executive Summary, p2.

<sup>2</sup> M2 Report, Vol 2, Chapter 10, p82, at [10.82].

<sup>3</sup> M2 Report, Vol 2, Chapter 10, p83, at [10.88].

at an early stage, to safeguard and support victim-survivors of domestic abuse. Victim-survivors are not a homogenous group and therefore those recommendations should be detailed, taking an intersectional approach and addressing the varied needs of different groups of victim-survivors and of the Violence Against Women and Girls (VAWG) organisations who support them.

4. Crucially, “*too little too late*” meant that the support implemented during the first lockdown was not timely, not adequate and not properly kept under review, so that the numbers of those abused were greater than they otherwise would have been, and abuse continued for a far longer period. Even more inexcusably, Government did not learn lessons when entering the second and third lockdowns.

## **B. THE CORE PARTICIPANTS IN THE DA GROUP**

5. The Inquiry is familiar with the work of SBS and SWA. LAWRS is described in the DA Group’s Rule 9 (R9) witness statement at [21] – [26].<sup>4</sup> It was founded in 1983 as a “*by and for*” migrant women’s service, for women migrating to the UK from Latin America, and casework for women experiencing gender-based violence, counselling and emotional support, advice on benefits, employment rights, family and immigration law, integration activities, crèches, peer-to-peer support, and access to empowerment and social change programmes. Most migrant women are in employment but are seriously affected by “in-work poverty”, working in low-paid/low skilled jobs, living in insecure, overcrowded and sub-standard private rented accommodation or experiencing “hidden homelessness”. A key campaigning priority for SBS and LAWRS, supported by SWA, is against the No Recourse to Public Funds (“NRPF”) condition, and other regulations affecting migrants that, collectively, constitute the “hostile environment”.<sup>5</sup>

## **C. APPROACH**

### **Evidence**

6. Relevant M2 evidence: (i) Opening Submissions dated 25 September 2023;<sup>6</sup> (ii) Closing Submissions dated 15 January 2024;<sup>7</sup> (iii) written statement and oral evidence of Rebecca Goshawk (SWA);<sup>8</sup> (iv) written statement of Hannana Siddiqui (SBS);<sup>9</sup> Dr Clare Wenham’s

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<sup>4</sup> INQ000652188\_0007 – 0008, DA Group R9 statement, at [21] – [26].

<sup>5</sup> INQ000652188\_0004, 0007 – 0008, DA Group R9 statement, at [12] & [24].

<sup>6</sup> *Module 2 Opening Submissions on behalf of Southall Black Sisters & Solace Women’s Aid*, 25 September 2023 (“**M2 opening submissions**”) [Publicly available].

<sup>7</sup> *Module 2 Closing Submissions on behalf of Southall Black Sisters & Solace Women’s Aid*, 15 January 2024 (“**M2 closing submissions**”) [Publicly available].

<sup>8</sup> INQ000280726, *Module 2 Witness Statement provided by Rebecca Goshawk on behalf of SWA*, 20 September 2023 [Publicly available] (“**M2 SWA statement**”); and *Module 2 Transcript* [4/146/15 – 4/170/13].

<sup>9</sup> INQ000282336, *Module 2 Witness Statement provided by Hannana Siddiqui on behalf of SBS*, 22 September 2023 [Publicly available] (“**M2 SBS statement**”).

expert report *Structural Inequalities and Gender*,<sup>10</sup> and her oral evidence.<sup>11</sup> Relevant M10 evidence: DA Group R9 statement; oral evidence from Ms Gisela Valle (LAWRS); Wenham’s M10 report *Unequal Gender Impacts of the Pandemic*;<sup>12</sup> other expert reports on structural inequalities; *Domestic abuse and safeguarding summary report*;<sup>13</sup> and *Justice System Roundtable Summary Report*.<sup>14</sup>

### **Women and girls**

7. Domestic abuse is experienced predominantly by women: for every three victims, two are female and one is male.<sup>15</sup> Female victims of domestic abuse are more likely to die, either as victims of homicide or domestic-abuse related suicides.<sup>16</sup> Therefore, we refer to “*women and girls*” as well as to “*victim-survivors*”. As in M2, we take an intersectional approach which recognises that women and girls’ experiences must be understood through the prism of existing structural inequalities, misogyny and discrimination in addition to their personal characteristics: gender, income, immigration status, race, housing, employment, disabilities, access to support and to the justice sector.

### **Definition of domestic abuse**

8. The definition of domestic abuse in England and Wales is at ss.1- 2 of the Domestic Abuse Act 2021 (“DAA”),<sup>17</sup> recognising that abuse is not confined to physical violence. Statutory guidance advises that domestic abuse includes so-called “*honour-based abuse*” (“HBA”), which itself includes female genital mutilation (“FGM”) and forced marriage.<sup>18</sup> The

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<sup>10</sup> INQ000280066, Wenham, *Module 2: Structural Inequalities and Gender*, 22 September 2023 (“**Wenham M2 Report**”).

<sup>11</sup> Module 2 Transcript [4/111/10 – 4/146/2].

<sup>12</sup> INQ000657974, Wenham, *Unequal Gender Impacts of the Pandemic*, October 2025 (“**Wenham M10 Report**”).

<sup>13</sup> INQ000587973, UK Covid-19 Inquiry, *Domestic Abuse and Safeguarding Summary Report*, September 2025 (“**DA Roundtable Report**”).

<sup>14</sup> INQ000656301, UK Covid-19 Inquiry, *Justice System Roundtable Summary Report*, 7 October 2025 (“**JS Roundtable Report**”).

<sup>15</sup> INQ000280066\_0015, Wenham M2 Report at [49]. See also Office for National Statistics, *Domestic abuse in England and Wales overview: November 2025*, 26 November 2025 [Publicly available]: 2.2 million females and 1.5 million males had experienced domestic abuse in the previous year.

<sup>16</sup> Office for National Statistics, *Homicide in England and Wales: year ending March 2024*, 6 February 2025, Appendix table 34 [Publicly available]: in the year April 2023 to March 2024 in England and Wales, there were 25 male victims of domestic homicides and 83 female victims. See also: Invisible Women (Killed Women) and Southall Black Sisters, *Invisible Women “Made Visible”*, October 2025 [Publicly available].

<sup>17</sup> In force from 5 July 2021. Sections 1 – 2 Domestic Abuse (Scotland) Act 2018, in force from 1 April 2019, provide that abuse must be likely to cause, or be intended to cause, “*physical or psychological harm*” which can include “*fear, alarm and distress*” and behaviour that makes the victim-survivor dependent, isolated, controlled, having her freedom of action restricted or frightens, humiliates, degrades or punishes her. In Scotland, the relationship between perpetrator and abuser must be that of “*partner and ex-partner*” (ss1 and 11 Domestic Abuse (Scotland) Act 2018). Sections 1 – 2 Domestic Abuse and Civil Proceedings Act (Northern Ireland) 2021 contain the same definition of domestic abuse as that in Domestic Abuse (Scotland) Act 2018, but the relationship between perpetrator and abuser is wider and refers to “*personally connected*”: Domestic Abuse and Civil Proceedings Act (Northern Ireland) 2021, s.5.

<sup>18</sup> HO, *Domestic Abuse: Statutory Guidance*, July 2022, at [87] – [98] [Publicly available].

statutory definition does not include a concept described by the VAWG sector as “immigration abuse”, where an abuser exploits a victim-survivor’s insecure immigration status, particularly her fear of being reported to the Home Office (“HO”), as a form of coercive control. Many of those victim-survivors will also be subject to NRP conditions giving them no access to support if they leave abusers, thus creating a stark choice between abuse, homelessness, and destitution, and a risk of deportation.<sup>19</sup>

### **C. MODULE 2 FINDINGS AND KEY ISSUES FOR MODULE 10**

9. The DA Group welcomes many of the findings and recommendations in the M2 Report. In particular: that an increase in domestic abuse was foreseeable and that, during lockdown, it would go undetected; and that Government should have given consideration to the numbers of people already known to be at risk of violence or other forms of abuse in their homes and planned how to mitigate those risks.<sup>20</sup> We also welcome the findings that: there was a lack of diversity among decision-makers, resulting in Government having no real understanding of the lives of those that the pandemic most affected, including women, children and ethnic minorities; there was a toxic culture at the centre of Government, including the use of offensive and misogynistic language, where voices of women were often ignored;<sup>21</sup> that the poor treatment of women remained an ongoing cultural issue; and that the pandemic impacted different groups differently, that disabled women were at increased risk of domestic and sexual violence, a risk exacerbated by lockdown; and that vulnerable people were more likely to experience digital exclusion.<sup>22</sup>
10. The DA Group submits that Government’s failure to anticipate the effect on lockdown for victim-survivors of domestic abuse is not solely due to the misogynistic toxic culture, or lack of diversity, at Downing Street. The Home Office (“HO”) was and remains responsible for VAWG and is no exception to the finding that Government failed to plan for what should have been an anticipated increase in the scale and severity of domestic abuse, even though the HO had received warnings prior to lockdown.<sup>23</sup>
11. The DA Group welcomes: Recommendations 6, 8 and 10. We hope that they are implemented and expect any Minister appointed to represent the interests of vulnerable

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<sup>19</sup> INQ000281093, Domestic Abuse Commissioner, *Safety Before Status: Improving pathways to support for migrant victims of domestic abuse*, 18 October 2021 (“**DAC Improving Pathways**”); and INQ000281104, Domestic Abuse Commissioner, *Safety Before Status: The Solutions*, 6 July 2022 (“**DAC The Solutions**”).

<sup>20</sup> M2 Report, Vol 2, Chapter 10, p82 – 83, at [10.82] – [10.88].

<sup>21</sup> INQ000273841\_0025, *Witness statement of Helen MacNamara*, 9 October 2023, at [45] [Publicly available].

<sup>22</sup> M2 Report, Vol 2, Chapter 10, p81, at [10.80], and Chapter 12, p185, at [12.99].

<sup>23</sup> M2 closing submissions, p8- 20, at[19] – [52]. Action Plan was not sent to the Home Secretary until 6 April 2020, funding not announced until 11 April (£2 million) and 2 May (£27 million) and “*You are not alone*” not launched until 11 April. The Home Secretary wrote for Mail on Sunday on domestic abuse on 29 March 2020.

groups to be given appropriate status and respect when she advocates for those groups, including victim-survivors of domestic abuse.

12. M10 is now an opportunity to focus on how victim-survivors experienced the pandemic and the associated restrictions, to address the underlying societal inequalities, including the compounded impact of domestic abuse on those facing intersecting vulnerabilities, and how Government's failure led to statutory services not addressing the needs of victim-survivors. In addition, the DA Group is concerned that the hostile environment for migrants, particularly NRPF, should be addressed, so that the triple threat for migrant victim-survivors is not repeated in future pandemics. We also draw attention to the long-term impact of the increase in scale and severity of domestic abuse during lockdown.<sup>24</sup> Accordingly, given M2's findings, the DA Group consider the following relevant:

- (a) How did lockdown and self-isolation affect the nature, complexities and extent of domestic abuse? Were some groups disproportionately affected?
- (b) How should Government plan for an inevitable and foreseeable increase in the scale and severity in domestic abuse?
- (c) What attempts should have been made for public services to identify victim-survivors so as to provide support?
- (d) Was the eventual additional funding to front line VAWG services enough to meet demand? What did this mean for victim-survivors, front line advisers, and key workers?
- (e) Were there or should there have been any policy changes between the respective lockdowns to try to stem the tide in domestic abuse?
- (f) How did NRPF conditions affect the thousands of women subject to it and experiencing domestic abuse? What support could they obtain? How could they find out about it? Was it adequate?
- (g) What did unclear messaging and digital exclusion mean for victim-survivors of domestic abuse?
- (h) What impact has there been on victim-survivors' mental health in the short and long term?
- (i) Was there sufficient safe and adequate housing? Was there sufficient refuge accommodation and how did victim-survivors access it?

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<sup>24</sup> Calls to front line services continued to increase throughout the pandemic and remained at high levels until NPIs ended: INQ000282336\_0017, M2 SBS statement at [45].

- (j) How did victim-survivors access police, legal advice or the courts?
- (k) What are the long-term effects on individuals, and on the VAWG sector, of the increase in scale and severity of domestic abuse as a result of lockdown?

#### **D. KEY THEMES**

##### **Context**

13. Wenham's M10 report addresses women and girls' exposure to violence.<sup>25</sup> In summary, pre-pandemic, women were subject to longstanding gendered inequalities in all aspects of society, which were exposed and intensified by the pandemic.<sup>26</sup> Certain groups were more at risk: younger women; Black and minoritised groups; people with disabilities and individuals with a long term or temporary illness; older women; and pregnant women. Migrant women with insecure immigration status, NRPF, or those not on spousal visas were especially vulnerable.<sup>27</sup> The DA Group submit that the existing societal inequalities shaped victim-survivors' experiences during the pandemic. Our evidence is that the impact of austerity policies and public spending cuts meant that VAWG organisations entered the pandemic already stretched beyond capacity, affecting their ability to support victim-survivors.<sup>28</sup>

##### **Increase in scale, severity and complexity of Domestic Abuse**

14. The severity and scale of domestic abuse worsened during the pandemic, resulting in women and girls having more complex needs.<sup>29</sup> The DA Group's R9 statement describes the dramatic increase in referrals and the increasing complexity of cases: in April 2020, SBS experienced a 62% rise in referrals from one single borough, between April 2020 - March 2021 inquiries rose by 46%, and inquiries from women with NRPF increased even more. SWA saw a 117% increase in calls to its advice line in March 2020, received 37% more referrals between April – June 2020 and 31% more referrals between April 2021 to March 2022. Calls went down when lockdown started and then increased again in anticipation of a further lockdown in September 2020. LAWRS initially experienced a drop in self-referral, but cases significantly accumulated between 2020 and 2022, and were notably more complex.<sup>30</sup> Their experiences are consistent with the wider VAWG sector.<sup>31</sup> Public research studies show stark evidence of this. Two-thirds of women already in

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<sup>25</sup> INQ000657974\_0035 - 0038, Wenham M10 Report, at [93] - [104].

<sup>26</sup> INQ000657974\_0039, Wenham M10 Report, at [105].

<sup>27</sup> INQ000657974\_0035, Wenham M10 Report, at [94].

<sup>28</sup> INQ000652188\_0093 - 0094, DA Group R9 statement, at [329] – [330].

<sup>29</sup> INQ000280726\_0017 - 0019, M2 SWA statement; M2 closing submissions, pp 5 - 6; INQ000652188\_0010 – 0016, DA Group R9 statement.

<sup>30</sup> INQ000652188\_0010 - 0016, DA Group R9 statement at [31] – [36].

<sup>31</sup> INQ000652188\_0016 - 0017, DA Group R9 statement at [37].

abusive relationships reported an increase in violence from their partners since the beginning of the pandemic.<sup>32</sup> Economic abuse increased: 1.6 million people reporting economic abuse indicated that it had begun during the pandemic; 79% of women responding to a survey reported that perpetrators attempted to control their finances during the pandemic.<sup>33</sup>

15. Lockdown and isolation created conditions for new forms of coercive control, such as restrictions on victim-survivors' use of their homes, limiting their communications, exploiting the virus and fear of it, exploiting fear of authorities and the requirement to work from home.<sup>34</sup> The impact of digital exclusion, whether deliberately imposed as a form of abuse, or arising from poverty or other forms of marginalisation, cannot be underestimated.<sup>35</sup> Raina, (SBS service user), was forced to remain indoors whilst her perpetrator went out freely, claiming the virus "*was in the air*".<sup>36</sup> Another service user was deliberately infected with the virus by her husband.<sup>37</sup> Maria, (SWA service user), said "*My perpetrator would do things like pull the Wi-Fi out of the wall....they would scream while I was having work meetings and colleagues called the police because they were worried for my safety*".<sup>38</sup> LAWRS report an increase in marital rape and forced pregnancy, with some victim-survivors unable to access contraception, and lockdown confinement making it more difficult to reject sexual assaults or advances. A recurring theme was that perpetrators, confined to the home and often drinking alcohol excessively throughout the day, became increasingly violent.<sup>39</sup> Regulations on bubbles were not considered in the context of domestic abuse. Bubbles could provide a support network, but for others, where the abuser controlled the bubble, they became another form of abuse and could deepen risk.<sup>40</sup>

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<sup>32</sup> INQ000228054\_0031, Women's Budget Group, *Lessons Learned - Where Women Stand at the Start of 2021*, 26 January 2021 ("**WBG Lessons Learned**"). Note that the data recorded by the police and ONS show a smaller increase, of around 6%, in calls to the police. In contrast, calls to the National Domestic Abuse Helpline increased by 22%.

See also INQ000281091\_0002, Southall Black Sisters, *Southall Black Sisters & Solace launch COVID-19 Crisis Project to Create Urgently Needed Safe Housing for women Fleeing Domestic Abuse*, 12 May 2020.

<sup>33</sup> INQ000228054\_0031, WBG Lessons Learned; and INQ000280145\_0008, Standard Life Foundation, *The Cost of Covid-19: Economic Abuse Throughout the Pandemic*, undated.

<sup>34</sup> INQ000652188\_0033 - 0036, DA Group R9 statement at [98] – [99], [104] – [108].

<sup>35</sup> INQ000184683\_0013, \_0089, University of Glasgow, *Left Out and Locked Down: Impacts of Covid-19 Lockdown for Marginalised Groups in Scotland*, December 2020 ("**Left Out and Locked Down**"); INQ000652188\_0036, DA Group R9 statement at [109].

<sup>36</sup> INQ000652188\_0041 - 0042, DA Group R9 statement at [105] – [128]. All names in the R9 statement are pseudonyms.

<sup>37</sup> INQ000652188\_0035, DA Group R9 statement, at [105].

<sup>38</sup> INQ000652188\_0037 – 0038, DA Group R9 statement, at [114].

<sup>39</sup> INQ000652188\_0032 - 0033, DA Group R9 statement at [97].

<sup>40</sup> INQ000065055\_0027 – 0028, *Statutory Review: Geography and Necessity of Measures*, 16 February 2021. See also INQ000652188\_0023, DA Group R9 statement, at [67].

16. For victim-survivors who lived apart from perpetrators, child contact arrangements could be used as a means of manipulation and control,<sup>41</sup> compounded by significant delays in child contact hearings.<sup>42</sup> Some parents were asked to facilitate children's contact with abusive ex-partners through video.<sup>43</sup> There was pressure on victim-survivors to engage in unsafe child contact arrangements. SWA report that abusers were keeping children after contact. LAWRS report that child contact arrangement became a tool of coercive control, making it harder for women to flee or report abuse without fear of losing their children.<sup>44</sup>

### **Additionally vulnerable groups**

#### **Children**

17. Children are victims of domestic abuse if they witness it.<sup>45</sup> Children witnessed increased levels of abuse directed at their carers/parents and experienced profound feelings of helplessness.<sup>46</sup> One victim-survivor said "...Before my ex would wait until he's [child] sleeping...But when the Coronavirus hit there was just no control anymore. He was at me every time, all the time, whether our son was there or not."<sup>47</sup> School closures removed a critical avenue of respite, disclosure, and safeguarding.<sup>48</sup>

#### **Disabled women and girls**

18. Disabled women, the majority of the disabled population, are three times more likely to experience domestic abuse, including the most severe forms, than non-disabled women.<sup>49</sup> Pre-pandemic, refuges had fewer bed spaces available for people with physical disabilities; there is only one specialised refuge in the UK for women with learning difficulties.<sup>50</sup> In the pandemic disabled women were twice more likely to experience

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<sup>41</sup> INQ000184683\_0091, *Left Out and Locked Down*; and INQ000650361\_0003, Women's Aid, *Women's Aid Federation of England Briefing on COVID 19*, May 2020; INQ000652188\_0037 – 0038, DA Group R9 statement, at [110] – [112].

<sup>42</sup> INQ000652188\_0065 – 0067, DA Group R9 statement, at [228] – [233].

<sup>43</sup> INQ000184683\_0039 - 0040, *Left Out and Locked Down*, which had the effect that perpetrators could see into victim-survivors' homes or mothers had to help children struggling with technology.

<sup>44</sup> INQ000652188\_0037, DA Group R9 statement at [111] and \_0095-\_0096 at [342]

<sup>45</sup> DAA 2021, s.3. A "'child' means a person under the age of 18 years": DAA 2021, s.3(4).

<sup>46</sup> INQ000652188\_0029 - 0031, DA Group R9 statement, at [85] – [92]. See also INQ000181677\_0004, Women's Aid, *The impact of the Covid-19 pandemic on children experiencing domestic abuse*, 1 January 2022.

<sup>47</sup> INQ000652188\_0029 - 0030, DA Group R9 statement at [87].

<sup>48</sup> INQ000652188\_0009 - 0010, DA Group R9 statement at [29] – [30].

<sup>49</sup> INQ000652383\_0006, *Stay Safe East, Policy response, Equality impact of Covid 19*, April 2020 ("**SSE Policy Response**"); and INQ000280158\_0038 Domestic Abuse Commissioner, *A Patchwork of Provision - How to meet the needs of victims and survivors across England and Wales*, November 2022 ("**DAC Patchwork of Provision**"). See also INQ000228054\_0032, WBG Lessons Learned: 17.3% disabled women in the UK experience domestic violence, compared to 7% non-disabled women and INQ000652384\_0004, Sisters of Frida, *The Impact of Covid-19 on Disabled Women from Sisters of Frida*, April 2020. INQ000649032\_0086, \_0111, Equality and Human Rights Commission, *Equality and Human Rights Monitor*, November 2023.

<sup>50</sup> INQ000652373\_0028, SafeLives, *Disabled Survivors Too: Disabled people and domestic abuse*, March 2017.

domestic abuse compared with non-disabled women.<sup>51</sup> Lockdown measures increased isolation (including the lack of information in BSL) and deepened dependence on their abusers for care, mobility, communication, and access to essential support.<sup>52</sup>

### **Black and minoritised women**

19. Nazroo and Bécares describe stark inequalities for Black and minoritised communities in infection, mortality rates and healthcare, as well as other detrimental impacts of the pandemic (financial circumstances, housing, social networks, experiences with the police, and education), resulting from and further exacerbating pre-existing inequalities.<sup>53</sup> Pre-pandemic, women from Black or minoritised backgrounds were most likely to experience domestic abuse including disproportionately experiencing particular forms of domestic abuse, such as forced marriage, HBA and/or FGM.<sup>54</sup> Research conducted amongst “by and for” VAWG organisations found that the additional vulnerabilities or disadvantages experienced by Black and minoritised women were exacerbated by the pandemic.<sup>55</sup> Imkaan refer to “*dual pandemics*”: the Covid-19 virus, and violence against women and girls, saying violence increased, “*but for Black and minoritised women and girls, racialised discrimination and the disproportionate impact of structural inequalities also become exacerbated*”.<sup>56</sup> The DA Group’s experience is that Black and minoritised women are less likely to report domestic abuse and more likely to approach Black and minoritised specialist services (“by and for” services, such as SBS and LAWRS) for help, as they trust them.<sup>57</sup> Those services have been eroded over the years.<sup>58</sup> Disruptions to healthcare services further affected Black and minoritised women experiencing domestic abuse, as safe opportunities for professionals to identify signs of abuse were removed.<sup>59</sup> Language

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<sup>51</sup> INQ000280066\_0015, Wenham M2 Report: nearly one in two disabled women experience domestic abuse in their lifetime.

<sup>52</sup> The End Violence Against Women Coalition, *Written evidence submitted by the End Violence Against Women Coalition (CVD0031)*, July 2020 (“**Evidence by EVAWC**”), p2 [Publicly available]; INQ000652383\_0007\_0009, Stay Safe East, *Policy Response Equality Impact of Covid 19*; and INQ000350302\_0060, Foster, *Report on the impact of Covid-19 on disabled people in Wales*, undated. INQ000280158\_0011, DAC Patchwork of Provision; INQ000227530\_0016, \_0063, Foster, *Locked Out: Liberating disabled people’s lives and rights in Wales beyond Covid-19 Report*, Undated.

<sup>53</sup> INQ000588214, Bécares and Nazroo, *Impact of the pandemic on racial and ethnic inequalities across the UK*, December 2025 (“**Bécares and Nazroo M10 report**”).

<sup>54</sup> INQ000657974\_0035, Wenham M10 Report, at [94]. The rate of domestic violence and abuse within many Black or minoritised populations was higher during this period than for their white counterparts: INQ000650332\_0003, University of Bristol and University of Lincoln, *The nature of domestic violence experienced by Black and minoritised women and specialist service provision during the COVID-19 pandemic: practitioner perspectives in England and Wales*, 24 November 2022 (“**Practitioner Perspectives article**”).

<sup>55</sup> INQ000650332\_0008, Practitioner Perspectives article.

<sup>56</sup> INQ000280152\_0003, Imkaan, *The Impact of the Dual Pandemics: Violence Against Women & Girls and COVID-19 on Black and Minoritised Women and Girls*, 11 May 2020.

<sup>57</sup> INQ000652188\_0018 – 0019, DA Group R9 statement at [53].

<sup>58</sup> INQ000650332\_0013, Practitioner Perspectives article. See INQ000588216\_0015, Watson and Shakespeare, *The impact of the pandemic and covid-19 on disabled people and those who are clinically vulnerable and clinically extremely vulnerable*, October 2025 (“**Watson and Shakespeare M10 report**”), at [43].

<sup>59</sup> INQ000657974\_0036, Wenham M10 Report at [97].

barriers and lack of culturally appropriate outreach excluded many victim-survivors from understanding their healthcare rights.<sup>60</sup>

### **LGBTQ+**

20. Bécares notes high rates of domestic abuse for LGBTQ+ people pre-pandemic and that: *“The LGBT Foundation’s Domestic Abuse Programme also experienced unprecedented demand for support since lockdown measures were introduced. This included a 38% increase in domestic abuse calls to the helpline, 820% increase in domestic abuse webpage views, and 340% increase in unique viewers to domestic abuse webpage”*.<sup>61</sup> Members of the LGBTQ+ population had difficulty in isolating, were often in hostile and harmful environments affecting their mental health, and had higher rates of depression, anxiety and suicidal ideation. There is little mainstream recognition of domestic abuse that occurs outside of opposite sex relationships.<sup>62</sup>

### **Immigration status and conditions**

21. Women with insecure status or subject to NRPF conditions face increased vulnerability to domestic abuse, limiting their access to safe housing, financial support and public services.<sup>63</sup> The “hostile environment”, encompassing NHS charging regime,<sup>64</sup> the right to rent,<sup>65</sup> data-sharing between public authorities and HO,<sup>66</sup> and NRPF conditions, creates significant barriers for migrant women seeking urgent support.<sup>67</sup> VAWG organisations report that insecure immigration status is routinely used by perpetrators as a weapon to intensify abuse. Women with NRPF are three times more likely to experience domestic abuse.<sup>68</sup> For many, the decision to leave an abusive situation, in circumstances where

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<sup>60</sup> INQ000652188\_0028, \_0056-0057, DA Group R9 statement, at [83], [187] – [189].

<sup>61</sup> INQ000657973\_0018, Bécares, *Inequalities experienced by LGBTQ+ groups*, October 2025 (“**Bécares M10 report**”), at [75] and [78]; see also INQ000280059, Bécares, *Module 2: Pre-existing inequalities experienced by LGBTQ+ groups*, 13 September 2023 (“**Bécares M2 report**”).

<sup>62</sup> INQ000217403\_0008, \_0019, LGBT foundation, *Hidden Figures: The Impact of the Covid-19 Pandemic on LGBT Communities in the UK*, 3rd Edition, May 2020; and INQ000280059\_0018, Bécares M2 report, at [76]. See also INQ000657973\_0018, Bécares M10 report, at [78].

<sup>63</sup> INQ000652188\_0027, DA Group R9 statement, at [80].

<sup>64</sup> Migrants (with prescribed exceptions) have to pay the Immigration Health Surcharge as part of their application for leave to enter or remain: Immigration (Health Charge) Order 2015, SI 2015/792, made under Immigration Act 2014, s 38. Once the amount is paid, they can use secondary health care. Undocumented migrants will not have paid the surcharge and will be charged for secondary health care services under National Health Service (Charges to Overseas Visitors) Regulations 2015, SI 2015/238. Sched 1 of those Regulations specifies diseases for which no charge is to be made for treatment.

<sup>65</sup> Immigration Act 2014, ss 20 – 37.

<sup>66</sup> Nazroo and Bécares identify vulnerabilities for Black and minoritised communities leading to a lower chance of receiving a NHS test for a SARS-CoV02 infection than white British, and that those vulnerabilities were exacerbated for migrant women and victim-survivors with insecure immigration status, whose fear of data-sharing with immigration authorities deterred engagement with covid testing systems: INQ000588214\_0023, December 2025, at [91] – [93].

<sup>67</sup> INQ000652188\_0027 - 0029, DA Group R9 statement, at [81 – [84].

<sup>68</sup> INQ000650337\_0031, Woolley, *Access Denied: The cost of the ‘no recourse to public funds’ policy*, June 2019.

they may face destitution, was not a matter of choice.<sup>69</sup> Importantly, the reluctance of this cohort to report domestic abuse means that it is not recorded on official data – they are the invisible and unaccounted victims of abuse.<sup>70</sup>

### **No Recourse To Public Funds (NRPF)**

22. NRPF is a visa condition limiting a person's ability to access public services and benefits.<sup>71</sup> There was (and remains) some limited provision (Migrant Victims of Domestic Abuse Concession ("MVDAC")),<sup>72</sup> by which victim-survivors have access to public funds for three months, while they apply for leave to remain under the Domestic Violence Indefinite Leave to Remain ("DVILR"). The MVDAC and DVILR are available only to those on spousal visas. Other migrants, such as those who are undocumented, or student, work, and dependent visa holders, were entirely excluded during the pandemic.<sup>73</sup> It is estimated that around 2.6 million people in the UK have NRPF<sup>74</sup> and are unable to access universal credit, child benefit, disability allowance, housing benefit, secondary health care, and homelessness assistance.<sup>75</sup> Primary health care is permitted but not always known or taken up by migrants, but secondary health care requires the Immigration Health Surcharge to have been paid.<sup>76</sup> Social services' support, under Care Act 2014 or Children Act 1989, is available but subject to restrictions.<sup>77</sup> Despite the number of people affected by this policy during the pandemic, Government took a clear decision not to suspend the condition, maintaining that stance throughout the pandemic.<sup>78</sup>
23. We submit that a significant number of women, certainly thousands of women, were disproportionately affected by the decision not to suspend NRPF during the pandemic, despite domestic abuse was intensifying. SBS and LAWRS report women with NRPF finding it more difficult to obtain support from social services during the pandemic.<sup>79</sup> In

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<sup>69</sup> INQ000108566\_0048, Dr Ravi K. Thiara, *Safe and Secure: The No Recourse Fund*, December 2020; and INQ000281093, DAC Improving Pathways; and INQ000281104, DAC The Solutions.

<sup>70</sup> INQ000176507, Eve Dickson et al., *Local Authority Responses to People with NRPF During the Pandemic*, August 2020 ("**Local Authority Responses Report**").

<sup>71</sup> A person subject to NRPF condition is usually permitted to work.

<sup>72</sup> Known as Destitute Domestic Violence Concession ("DDVC") until February 2024.

<sup>73</sup> From February 2024, after the pandemic, partners of work and student visa holders have been able to access the MVDAC for three months but are not eligible for the DVILR.

<sup>74</sup> There are no official statistics but see INQ000508361\_0002, The Migration Observatory, *Deprivation and the no recourse to public funds (NRPF) condition*, 15 November 2023.

<sup>75</sup> INQ000228058\_0011, Women's Budget Group, Fawcett Society, Women's Aid, Young Women's Trust, Imkaan, Maternity Action and WEN Wales, *Building back fairer for women and girls*, 19 July 2021.

<sup>76</sup> INQ000235286\_0098, Doctors of the World, *A Rapid Needs Assessment of Excluded People in England During the 2020 Covid-19 Pandemic*, May 2020 ("**DOTW Rapid Needs Assessment**").

<sup>77</sup> Nationality, Immigration and Asylum Act 2002, s.54 and Sched 3.

<sup>78</sup> The only concrete offer of assistance for migrant victims of domestic abuse, including those with NRPF, is the Support for Migrant Victims scheme operated by SBS, launched in June 2021 as a pilot scheme (funding of £1.5 million to provide safe accommodation). This was not a measure intended to assist women during the pandemic.

<sup>79</sup> INQ000652188\_0028 - 0029, DA Group R9 statement at [82] – [84].

addition to those barriers, women with NRPF found that their vulnerabilities were compounded by other forms of discrimination: people with NRPF were more likely to become seriously ill or die from the virus, were unnecessarily exposed to the virus, were more likely to face difficulties securing urgent housing, and were at risk of destitution.<sup>80</sup> Migrant women are disproportionately concentrated in low-paid, part-time and insecure sectors, compounding financial insecurity with heightened exposure to the virus and increased financial dependence on abusive partners.<sup>81</sup> Refuge accommodation is often not available to women with NRPF, even though they are less likely to have established alternative networks.<sup>82</sup> The combined and cumulative impact of the abuse experienced, the failure to suspend NRPF, the inability to access benefits or other services, and the intersectionality of the discrimination they faced, exacerbated the extent and impact of domestic abuse they suffered during the pandemic.

### **Undocumented migrants**

24. At the end of 2017 there were estimated to be between 800,000 and 1,2 million undocumented migrants in the UK.<sup>83</sup> Undocumented migrants, like those with NRPF, do not receive government support and often have no choice but to stay with or return to abusive partners. Many rely on cash which means even greater dependency on perpetrators and work in undocumented employment.<sup>84</sup> Secondary health care for Covid-19 was exempt from NHS charging,<sup>85</sup> but many were unaware, reluctant to register due to fear of punitive action from authorities, or coerced into not registering, and so found it difficult to access Covid-19 testing and vaccination. Undocumented migrant victim-survivors are particularly reluctant to report to police. Overall, undocumented women experiencing abuse were left in a constant state of precarity and anxiety over their safety.<sup>86</sup>

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<sup>80</sup> INQ000176507\_0010, Local Authority Responses Report.

<sup>81</sup> INQ000657974\_0016, Wenham M10 Report at [42]; INQ000652188\_0023 and \_0028, DA Group R9 statement at [68] and [83].

<sup>82</sup> INQ000280158\_0040, DAC Patchwork of Provision: Most refuge accommodation is funded by housing benefit/universal credit. The Crisis Project run by SBS and SWA, launched in May 2020 and funded by Mayor of London, provided bed spaces to 73 women with NRPF, but even that was insufficient and only applied to London: INQ000652188\_0005, DA Group R9 statement, at [14]. See also INQ000652188\_0042, \_0050 - 0051, DA Group R9 statement, at [128] and [171].

<sup>83</sup> INQ000401114\_0005, Phillip Connor and Jeffrey S. Passel, *Europe's Unauthorised Immigrant Population Peaks in 2016, Then Levels Off*, 13 November 2019. The term refers to people living without permission who are not citizens or (post-Brexit in unusual circumstances), EEA nationals. Often, they entered the UK with a visa and subsequently failed to leave (“overstayers”) or have had claims for asylum refused and have not left.

<sup>84</sup> So the Job Retention Scheme was not available.

<sup>85</sup> National Health Service (Charges to Overseas Visitors) (Amendment) Regulations 2020/59, inserting “*Wuhan novel coronavirus (2019-nCoV)*” into Schedule 1 National Health Service (Charges to Overseas Visitors) Regulations 2015, SI 2015/238, with effect from 29 January 2000, revoked with effect from 14 February 2022 by National Health Service (Charges to Overseas Visitors) (Amendment) Regulations 2022, SI 2022/19.

<sup>86</sup> INQ000652188\_0028, \_0040, \_0056, \_0067, \_0080, DA Group R9 statement, at [83], [120], [189], [235] and [281].

### **Government failure to plan for domestic abuse**

25. Government's approach, and that of other public bodies, was that victim-survivors of domestic abuse could reach out for help: the message of the "You Are Not Alone" campaign. This failed to address the practical and psychological barriers that prevent many victim-survivors from seeking help while confined with their abusers. The message was also late and ineffectively delivered. Government was aware that the closure of schools removed opportunities for safeguarding and reporting abuse.<sup>87</sup> Nevertheless, we have seen no evidence of any strategy, policy, or operational framework that adopted a proactive approach to identifying victims of domestic abuse or maintaining contact with those already known, or on liaising between social services, GPs, foodbanks and other services.<sup>88</sup> This failure was not solely the result of a "toxic and chaotic culture at the centre of the UK government", including "a culture in which the loudest voices prevailed and views of other colleagues, particularly women, often went ignored"<sup>89</sup>. It was, more fundamentally, a widespread failure throughout Government and public services to recognise the widespread and complex nature of domestic abuse.

### **VAWG Service Providers**

#### ***Funding***

26. VAWG services received additional funding: £2 million for technological support and helplines on 11 April 2020 £27 million on 2 May.<sup>90</sup> It was late, and not enough to meet demand.<sup>91</sup> Separately, SBS and SWA secured funding from the Mayor of London to open their Crisis Project, which provided accommodation and support to 205 women from May 2020 to September 2021.<sup>92</sup> Whilst the emergency funding was welcome, the VAWG sector continues to experience the insecurity of short-term funding, and inadequate

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<sup>87</sup> INQ000050235\_0021, Cabinet Office, *Social Distancing Review, Assessment of the impact of current measures*, 30 April 2020. The Chair of the Equalities and Human Rights Commission, David Isaac, wrote to the Prime Minister on 19 March 2020: INQ000185278\_0002, *Letter from Equality and Human Rights Commission to Prime Minister Johnson*, 19 March 2020. Martin Hewitt's evidence in M2 was that the police were aware that domestic abuse is a largely hidden crime and that he had regular meetings with the Home Secretary Priti Patel through the early periods of the pandemic: Module 2 Transcript [21/1/5 – 21/99/2].

<sup>88</sup> In contrast, social services' contact with children, either online or through adapted one to one visits, was maintained. The PCFSW Digital Research & Practice Development Project, *The PCFSW & Social Work England Best Practice Guide for Risk Assessment and Prioritising Children and Families' Needs during Pandemic*, 31 March 2020, p3.

<sup>89</sup> M2 Report, Vol 1, Introduction, p11; Vol 2, Chapter 11 paras 11.167, 11.170 – 11.181.

<sup>90</sup> INQ000279975\_0020, footnote 54, *Module 2 Witness Statement of Dame Priti Patel*, 20 September 2023 [Publicly available].

<sup>91</sup> INQ000282336\_0041 – 0042, M2 SBS statement; and INQ000280726\_0039 – 0040, M2 SWA statement. See also INQ000652188\_0094, DA Group R9 statement at [332] – [333].

<sup>92</sup> INQ000652188\_0059, DA Group R9 statement, at [198].

funding overall.<sup>93</sup> Victim-survivors who experienced abuse during the pandemic continue to suffer its effects and demand remains higher than before the pandemic.

### **Refuge Accommodation: Bed Space**

27. SWA saw four referrals for every refuge space.<sup>94</sup> At one point in April 2020 all 23 of their refuges were full. When the emergency 70-bed accommodation opened in May 2020 it was full within a month; by December they were turning away 40% of referrals.<sup>95</sup> Despite managing to accommodate 73 women with NRPF, other women with NRPF comprised half of all the referrals turned away.<sup>96</sup> 75% of Black and minoritised women who fled domestic abuse were unable to secure accommodation in refuges because spaces were full.<sup>97</sup> 45% of 71 organisations surveyed reported a substantial, critical, or urgent need for additional refuge bed spaces.<sup>98</sup> This reflected both a sharp rise in demand and difficulties in move-on accommodation from local housing authorities, preventing refuge spaces from being freed up. The consequences of insufficient refuge space for victim-survivors of domestic abuse in normal times require little elaboration: women are left with an impossible choice between homelessness and remaining with their abuser. During a pandemic, however, the implications are even more severe. There were few, safe alternatives. The essential lessons of the pandemic for the VAWG sector are: increased refuge capacity, clear consistent guidance, and more opportunities to move on from refuges.

### **Key Workers**

28. Frontline workers in the VAWG sector experienced substantial personal and professional impacts during the pandemic. They worked incredibly hard, adjusting their working practices and responding to the increase in scale and severity of their caseload, but this has had long-term effects, including, for some, long-term vicarious trauma and burn-out.

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<sup>93</sup> INQ000280181\_0074, Women's Aid, *The Domestic Abuse Report 2022, The Annual Audit*, March 2022 (“**DA Report 2022**”).

<sup>94</sup> The normal ratio being two to one – see INQ000108557\_0003, *Module 1 Witness Statement provided by Rebecca Goshawk on behalf of SWA*, 17 February 2023, at [10].

<sup>95</sup> Module 2 Transcript [4/154/124 – 4/156/1].

<sup>96</sup> INQ000176543\_0003, Solace Women's Aid, *Violence against women and girls, housing and homelessness: A joined-up strategy*, undated (“**VAWG, housing and homelessness**”).

<sup>97</sup> INQ000281059\_0002, *Summary of VAWG Responses to Request for Evidence*, undated (“**Summary of VAWG Responses**”). This report comes from Imkaan, an umbrella group dedicated to addressing violence against black and minoritised women, which supports frontline “*by and for*” organisations who deliver services.

<sup>98</sup> INQ000281059\_0005 - 0006, *Summary of VAWG Responses*.

See also INQ000280181\_0026, *DA Report 2022*: which recorded that although the overall number of bed spaces increased between May 2020 and 2021, the number of vacancies available on any given day fell by 19.9% compared with 2019.

INQ000280181\_0054, *DA Report 2022*: 66.7% of refuge providers cited a lack of bedspaces available as the biggest barrier to them accepting referrals during the period.

Front-line advice workers experienced heightened anxiety as individuals known to be in dangerous situations became unreachable.<sup>99</sup> SBS notes that victim-survivors were not contacting them until their situations had become urgent or at emergency level.<sup>100</sup> Practitioners became concerned about their service users' material circumstances, and service providers moved from primarily therapeutic interventions towards meeting urgent practical needs,<sup>101</sup> such as food provision.<sup>102</sup> There was increased pressure on refuge staff. Working on site increased the risk of exposure to the virus. The combination of increased demand, constrained capacity, and heightened health risks placed additional strain on already overstretched services and staff.

29. There was widespread confusion as to whether workers in the VAWG sector were designated as “key workers”,<sup>103</sup> which was never clarified and led to workers being treated differently in different locations, with significant practical consequences, such as access to schools, testing, personal protective equipment (“PPE”), and early vaccination. The nature of VAWG sector work requires in-person contact and so staff, predominantly women, were at risk.<sup>104</sup> Government had been warned about this lack of clarity before lockdown, but never rectified it.<sup>105</sup> In addition VAWG sector workers experienced vicarious trauma, which has had long-term effects, both on the individuals and on the sector as people have left.<sup>106</sup> LAWRS: *“It is important to speak about the human cost of working in the VAWG sector. Several women left the sector completely burnt out after Covid and lots of these women came from the by and for sector.”*<sup>107</sup> One advocate said: *“...there were some triggering points...it was a different type of support. I’ve never really had to give bereavement support...I’ve never lost a service user...very emotional. And mentally very very draining. I couldn’t physically go to see them so I couldn’t comfort them...”*<sup>108</sup>

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<sup>99</sup> INQ000184683\_0099, \_0112, Left Out and Locked Down.

<sup>100</sup> INQ000652188\_0022, DA Group R9 statement at [64].

<sup>101</sup> INQ000652188\_0051, DA Group R9 statement at [173].

<sup>102</sup> INQ000184683\_0108, Left Out and Locked Down: Research in Scotland into the impact of C19 lockdown for marginalised groups reported food distribution rising by 57% and financial grants to individuals by 56%. See also INQ000652188\_0059, DA Group R9 statement at [199]. Organisations developed innovative approaches to maintaining support, such as on-line yoga, cooking classes etc, and online counselling, but not all clients had access online: INQ000652188\_0051, DA Group R9 statement at [173].

<sup>103</sup> INQ000280726\_0055, M2 SWA statement. See also comments from Imkaan and Women’s Aid Federation of England in INQ000281059\_0013, \_0022, Summary of VAWG Responses.

<sup>104</sup> INQ000228054\_0006, WBG Lessons Learned.

<sup>105</sup> INQ000231082\_0005 - 0006, SafeLives, *Domestic abuse frontline service COVID-19 survey results*, April 2020; INQ000231081\_0001, *Emails between Private Secretary to the Home Secretary and Home Office colleagues, regarding domestic abuse funding in response to Covid-19*, 6 April 2020.

<sup>106</sup> INQ000652188\_0088 - 0089, DA Group R9 statement, at [311] – [315].

<sup>107</sup> See Al-Hasaniya, in INQ000281059\_0035, Summary of VAWG Responses; and INQ000119321\_0001, Extract of meeting summary from the Domestic Abuse Sector, involving national helpline providers, second tier organisations and Government departments, 24 November 2020 [Publicly available].

<sup>108</sup> INQ000652188\_0091, DA Group R9 statement at [322].

## **Justice Sector**

30. The pandemic significantly disrupted criminal and civil justice processes, affecting victim-survivors in multiple ways: lack of clear communication about proceedings, uncertainty about child welfare and contact hearings, increased delays, and greater difficulty accessing legal representation urgently.<sup>109</sup> The sharp divergence between the figures from the VAWG sector and those from the police<sup>110</sup> suggests that, during lockdown, women found it easier to contact helplines than to contact the police.<sup>111</sup> Many women, particularly Black and minoritised women, have prior experience of being disbelieved or let down by the police, and migrant victim-survivors are reluctant to report abuse to the police, given concerns over data-sharing between police and HO.<sup>112</sup> Lavanya (SWA service user) said: "...[the police] came over to my mums house ...and they were awful...The policewoman was so condescending. She said to me "you know sometimes you say no when you mean yes".<sup>113</sup> Use of Domestic Violence Protection Notices ("DVPNs") and Domestic Violence Protection Orders ("DVPOs") fell significantly from previous years.<sup>114</sup> Women felt courts were more reluctant to grant these orders, particularly where an order would render the perpetrator homeless or increase exposure to the virus.<sup>115</sup> Technology barriers and delays were, and remain, barriers to access to justice. Many victim-survivors – particularly older women or deaf and disabled women – either lacked access to internet-enabled devices or did not know how to use them. This had a significant impact on urgent applications in family and immigration cases.<sup>116</sup> Legal aid is available to victim-survivors of domestic abuse seeking protective orders, subject to means testing. The Law Society recommended in September 2020 that non-means tested legal aid should be reinstated for victims of domestic abuse.<sup>117</sup>

## **Mental Health**

31. Domestic abuse is an established risk factor for poor mental health and perpetrators often use mental ill-health as a means of control, deliberately targeting women they perceive

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<sup>109</sup> INQ000184683\_0092, Left Out and Locked Down.

<sup>110</sup> INQ000652188\_0013 - 0016, DA Group R9 statement at [38] – [46].

<sup>111</sup> INQ000053101\_0006, *Extract of briefing and agenda from Covid-19 Operations & Policy Gold Command to Home Secretary, regarding a Cabinet Committee on Public Resilience*, 15 April 2020.

<sup>112</sup> Goshawk, Module 2 Transcript [4/160/3 – 4/160/12]; INQ000652188\_0067, DA Group R9 statement at [234] – [235].

<sup>113</sup> INQ000652188\_0071 - 0072, DA Group R9 statement, at [245] – [247].

<sup>114</sup> INQ000475125\_0007, Women's Aid, *Shadow Pandemic – Shining a Light on Domestic Abuse During Covid*, 10 September 2021, ("**WA Shadow Pandemic**").

<sup>115</sup> INQ000280160\_0014, End Violence Against Women, *Access to Justice for Women & Girls during Covid-19 Pandemic*, August 2020.

<sup>116</sup> INQ000652188\_0064 - 0067, DA Group R9 statement at [224] – [233].

<sup>117</sup> INQ000530827\_0032 - 0033, The Law Society, *Law under Lockdown: The Impact of Covid-19 Measures on Access to Justice and Vulnerable People*, September 2020.

as vulnerable.<sup>118</sup> An immediate and then long-term effect of the increased scale and severity of domestic abuse, and the impact of isolation, was the impact on many victim-survivors' mental health, with symptoms including PTSD, anxiety and increase in suicidal ideation.<sup>119</sup> The DA Group's experience is that the pandemic led to a "perfect storm" of psychological distress for victim-survivors through the combination of intensified abuse, isolation from support networks, and reduced access to mental health services.<sup>120</sup>

### **Housing**

32. SWA report that 70% of survivors in their services have a housing need and 43% have experienced financial abuse affecting their access to financial resources and economic independence.<sup>121</sup> Housing was a significant issue during the pandemic for domestic abuse victim-survivors. Shelter's evidence is that people fleeing domestic abuse still became street homeless.<sup>122</sup> All four nations introduced measures to provide emergency accommodation regardless of immigration status, known as "Everyone In" in England, but this was aimed at rough sleeping; eligibility became confusing and a significant postcode lottery developed.<sup>123</sup> Where accommodation was provided by social services,<sup>124</sup> it was not always provided promptly or appropriately, for example a family fleeing abuse was denied accommodation together, leading them to consider returning to abuse, only avoided due to SBS's intervention.<sup>125</sup> The DA Group's experience was that it was hard to contact local authorities, they routinely practised "gatekeeping" (discouraging applications) and were processing applications slowly, at times almost coming to a halt. Victim-survivors might be placed in unsuitable temporary accommodation, particularly mixed-sex hostels.<sup>126</sup> This all contributed to the pressure on refuge space, through lack of move-on accommodation.<sup>127</sup> When the eviction ban was lifted, homelessness

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<sup>118</sup> INQ000659787\_0018, Centre for Strategy & Evaluation Services, *Systematic Evidence Review: The impact of the Covid-19 pandemic on the mental health and wellbeing of the UK adult population*, October 2025. See also Women's Aid, *Mental health and domestic abuse: A review of the literature*, December 2021, [Publicly available], ("**WA Review of Literature**"), p52.

<sup>119</sup> WA Review of Literature p14; and INQ000182793\_0019 - 0020, Scottish Government, *The Impacts of COVID-19 on Equality in Scotland*, September 2020.

<sup>120</sup> INQ000652188\_0075, DA Group R9 statement, at [264]; INQ000475125\_0006, WA Shadow Pandemic.

<sup>121</sup> INQ000176543\_0003, VAWG, housing and homelessness.

<sup>122</sup> INQ000621075\_0006, \_00017, \_00041 – 0042, Shelter, *Everyone In: Where are they now? The need for a roadmap out of street homelessness in England*, August 2021.

<sup>123</sup> INQ000657974\_0022, Wenham M10 Report at [59]; INQ000651746\_0008 - \_0017, Tim Gutteridge, Shelter, second witness statement, 1 August 2025.

<sup>124</sup> Under the duty at Children Act 1989, s.17 (England).

<sup>125</sup> INQ000652188\_0029\_0029, DA Group R9 statement at [86].

<sup>126</sup> INQ000652188\_0052-\_0056, DA Group R9 statement, at [178] – [186].

<sup>127</sup> In Scotland, the Scottish Women's Aid and Chartered Institute for Housing (CIH) issued guidance for social landlords setting out how local authorities and housing associations could meet their responsibility to prevent and respond to domestic abuse during the pandemic, including by continuing to allocate empty properties to women experiencing domestic abuse: INQ000176211\_0013, Scottish Women's Aid, *Crisis and Resilience: the impact of a global pandemic on domestic abuse survivors and service providers in Scotland*, 1 September 2020. This would have helped to ameliorate the demand for refuge places but was not replicated in England or Wales.

applications to local authorities increased.<sup>128</sup> The majority of those were from victim-survivors, a striking fact underscoring the extent to which victim-survivors were unable to seek safety or assistance while restrictions remained in place.<sup>129</sup>

### **Government Messaging**

33. Social distancing regulations and lockdown exceptions were inconsistent, often changing, and difficult to interpret or understand, described in the M2 Report as “[f]requent, complex changes to the law fuelled confusion, misunderstanding and – at times – incorrect enforcement”.<sup>130</sup> Although people were legally permitted to leave their homes “to avoid injury or...escape a risk of harm”,<sup>131</sup> neither the Regulations nor guidance referred to “domestic abuse”, a familiar term. It is not intuitively obvious that “injury or harm” includes domestic abuse, and it fails to capture other forms of domestic abuse. This confusion was compounded when, as the M2 report recognises: “time and again, public messaging failed to reflect the actual laws in place”.<sup>132</sup> During 2020, Boris Johnson and Dominic Raab referred to “escape injury or harm”,<sup>133</sup> rather than to domestic abuse. For victim-survivors, confined at home with perpetrators, the failure to specify domestic abuse increased confusion. HO launched #YouAreNotAlone campaign on 11 April 2020, to try to communicate with victim-survivors, but this had less impact than Prime Ministerial statements.<sup>134</sup> It was not until 4 January 2021, that Johnson, announcing the third lockdown, said “you may only leave home for limited reasons permitted in law, such as ...to escape domestic abuse.”<sup>135</sup> Overall, Government failed to consider whether and how victim-survivors could safely receive access to online and offline material, understand their content, or know what to do.
34. Effective information and messaging should have addressed critical practical questions, including: when and under what circumstances they could lawfully leave; whether they

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<sup>128</sup> Department for Levelling Up, Housing & Communities, *Statutory homelessness in England: financial year 2022-23*, 6 November 2023 [Publicly available].

<sup>129</sup> INQ000176206\_0006, Scottish Women’s Aid, *Scottish Women’s Aid Annual Report 2020-21*, 1 January 2021: “Domestic abuse is the main reason given by women for making a homeless application in Scotland”. Department for Levelling Up, Housing & Communities, *Statutory Homelessness Annual Report 2021-22, England*, 22 September 2022, p23 [Publicly available]: “There was also a 59.1% increase in the number of households owed a main duty due to domestic abuse, representing 2,530 households in 2021-22.”.

<sup>130</sup> M2 report, Vol 1, Introduction, p.12.

<sup>131</sup> INQ000086830\_0004, Prime Minister’s Office, Rt Hon Boris Johnson MP, *Prime Minister’s statement on coronavirus (COVID-19)*, 31 October 2020, [Publicly available] (“**PM October Statement**”).

<sup>132</sup> M2 Report, Vol 1, Introduction, p12.

<sup>133</sup> INQ000086830\_0004, PM October Statement. See also analysis in M2 Closing Submissions, pp20 – 23, [53] – [61].

<sup>134</sup> INQ000086759\_0003, Prime Minister’s Office, Rt Hon Boris Johnson MP, *Prime Minister’s statement on coronavirus (COVID-19)*, 23 March 2020 [Publicly available].

<sup>135</sup> INQ000086664\_0003 Prime Minister’s Office, Rt Hon Boris Johnson MP, *Prime Minister’s statement on coronavirus (COVID-19)*, 4 January 2021 [Publicly available].

could leave with their children; whether friends, family, or others offering temporary refuge would themselves risk enforcement action or prosecution whether there were accessible and reliable places to go to; whether their immigration status would be affected; and whether they would be entitled to receive support. Whilst a single national announcement could not reasonably convey all this information, detailed information was not conveyed through alternative channels, such as directing health services<sup>136</sup> to post information on help available for victim-survivors.<sup>137</sup>

35. For these issues to have been identified, and then acted upon, Government must have a genuine understanding of the lived realities of women facing domestic abuse. The evidence indicates that such understanding was lacking. This failure was not solely attributable to the toxic culture at the heart of Government<sup>138</sup>; it reflected a broader, systemic problem reflecting how society, including its institutions, recognises and responds to the needs, fears, and constraints faced by victim-survivors of domestic abuse.

## **E. CONCLUSION/RECOMMENDATIONS**

36. The DA Group has made detailed recommendations for future pandemic preparedness, specific service areas, and long-term structural changes in its R9 statement and asks that all of those recommendations are carefully considered.<sup>139</sup> We add, or highlight, the following recommendations for the Inquiry:

- (a) Endorse and adopt Wenham's recommendations on domestic abuse;<sup>140</sup>
- (b) Government's crisis planning structures must include domestic abuse as part of its agenda for managing a crisis, assisted by an external advisory body, similar to SAGE, to advise on social implications of public health measures;
- (c) Suspend the NRPF condition during a pandemic, and extend MVDAC and DVILR to all migrant victim-survivors regardless of visa status. Introduce firewalls to prevent data-sharing between police, other agencies and immigration enforcement;
- (d) Ensure that there is a multi-disciplinary approach to identifying those at risk of domestic abuse and mechanisms to reach out;

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<sup>136</sup> Health services are often a safe, unaccompanied contact point for victim-survivors and play a critical role in referral to domestic abuse services: 44% of women first disclosed abuse in healthcare settings – more than twice the number who disclosed to police (17%): INQ000280158\_0052 DAC Patchwork of Provision.

<sup>137</sup> No guidance was given to GPs, schools, food banks, or even to utility companies or other organisations whose websites would be accessed from home.

<sup>138</sup> As found in the M2 Report, see footnote 89.

<sup>139</sup> INQ000652188\_0101 - 0106, DA Group R9 statement, at [361] – [377].

<sup>140</sup> INQ00065794\_0037 - 0038, Wenham report, at [104].

- (e) Consider messaging with the needs of vulnerable in mind and guided by the Public Sector Equality Act Duty. Ensure that messaging conveys statutory rights, with translations and BSL interpretations. Monitor and address the impact of digital exclusion, especially for migrant women with NRPF and those outside formal employment. Monitor the effectiveness of information available;
- (f) Ensure that timely and sufficient funding is available for health, housing and other services to provide services to victim-survivors;
- (g) Suspend means tested legal aid requirements in domestic abuse cases;
- (h) For the VAWG sector:
  - i. Ensure that available refuge space meets the demand;
  - ii. Clearly designate frontline domestic abuse workers as key workers in emergencies from the start; and
  - iii. Ensure early and sufficient funding for the VAWG sector, including ring-fenced funding for “*by and for*” organisations and for embedded advocates in key services such as emergency departments, maternity services, mental health, and sexual health clinics, funded by Government.

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**Public Interest Law Centre**

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