

**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**

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**Response to the Rule 9 Request issued to  
Covid 19 Bereaved Families For Justice and Bereaved Families**

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1. On 7 November 2022 BJC received a Request for Evidence under Rule 9 of the Inquiry Rules 2006 for our client's attention. The initial request asked for a response by 28<sup>th</sup> November but following joint submissions from a number of Core Participants the deadline was extended to 9<sup>th</sup> December.
2. The Inquiry Legal Team explained that it sought a high-level response consisting of brief answers to seven questions and accordingly funding would not be available to assist our client in preparing its response. This was designed to be a starting point and upon review of the responses the Inquiry would decide whether to issue more detailed and specific rule 9 requests for witness statements where legal assistance would be more necessary.
3. In accordance with that guidance please find below answers to the seven questions posed and a number of lists of documents/submissions/articles as requested (schedules 1-3). We also attach a schedule of material provided by individual bereaved families (schedule 4).
4. If any further information or the underlying documents would be of assistance please let us know. As the Inquiry is aware, the goal of CBFFJ and its members, is to establish the truth of what happened to their loved ones and others, to ensure accountability and to learn lessons to prevent future deaths. CBFFJ wishes to do all it can to assist the Chair in achieving those same aims through effective participation in the Inquiry.

**1. A brief overview of the history, legal status and aims of the organisation or body. Please explain whether the work of the organisation or body is UK wide, or is instead confined to England, Scotland, Wales or Northern Ireland only.**

Covid 19 Bereaved Families for Justice is an organisation of over 6,000 members, all of whom have lost a loved one to Covid 19. The campaign was founded in March 2020 with the purpose of learning lessons throughout the pandemic in order to save lives. Covid 19 Bereaved Families for Justice UK is a Private Limited Company by guarantee without share capital use of 'limited' exemption.

CBFFJ is a core participant in Module 2 of the Inquiry, and is represented by Broudie Jackson Canter. CBFFJ is a UK wide organisation. We have members in every nation in the UK and continue to campaign for and engage with devolved inquiries into the handling of the pandemic.

**2) A brief description of the group(s) which the organisation or body supports or represents.**

Covid 19 Bereaved Families for Justice have successfully campaigned for the formation of the Covid 19 Inquiry and have, at every turn, fought for lessons to be learned as soon as possible to prevent other families from suffering as they have. Covid 19 Bereaved Families for Justice have also campaigned for improved accessibility to bereavement support, post bereavement financial support and policy reviews to prevent avoidable mistakes from being repeated. We continue to empower our members to hold the Government and public bodies to account to ensure that the circumstances leading to their loved one's deaths are avoided in the future. CBFFJ created the National Covid Memorial Wall, which, along with our online groups, has provided comfort and community to those who have lost the most to Covid 19. We have campaigned for increased provision of bereavement support for those who lost loved ones during the pandemic, and for memorialisation of the pandemic throughout the UK.

Covid 19 has touched every corner of our communities, and so our membership reflects a broad demographic united by the aim to learn lessons and save lives in this and future pandemics.

**3. A brief overview of the work of the organisation or body in supporting or representing the relevant group(s) between January 2020 and Spring 2022 as it relates to the response to Covid-19 of (a) the UK Government; (b) the Scottish Government; (c) the Welsh Government; and/or (d) the Northern Ireland Executive.**

The aim of Covid 19 Bereaved Families for Justice, since its inception in 2020, has been to bring about a public, statutory inquiry into the handling of the pandemic so that lessons can be learned that will save lives in this and future pandemics. In May 2021, under threat of Judicial Review and under renewed media scrutiny following the creation of the National Covid Memorial Wall, the then Prime Minister Boris Johnson agreed to hold an Inquiry into the handling of the pandemic. We continued to campaign until December of 2021 for a Chair to be named, and that was followed by further months of campaigning for the Prime Minister to officially begin inquiry proceedings, which he did in June 2022, under threat of Judicial Review once again.

Although Covid 19 Bereaved Families for Justice have always maintained that a statutory public inquiry would provide the best mechanism for learning lessons and saving lives, in the absence of an inquiry until 2022, we have at times campaigned for specific policy changes and interventions. Drawn from the experiences and insights of our members, who know better than any, how and to what severity those who died of Covid 19 were let down, our recommendations were made with the aim of saving lives and making the handling of the pandemic more equitable.

We called on the Government to carry out an urgent review into NHS 111 systems which our members know from experience is not fit for purpose and is riddled with racial and ableist bias. We have also urged the Government to reinstate the free provision of Covid 19 tests in order to encourage regular testing and prevent those who look after or live with vulnerable people from experiencing disproportionate financial harm in the course of keeping their loved ones safe. We forced the Care Quality Commission to publish the number of people who died of Covid 19 in care homes, in the belief that greater transparency would help families make decisions about the care of their loved ones throughout the rest of the pandemic, and we have continuously offered to meet with Sage and Government Ministers to share our members valuable insights as experts by experience into what has gone wrong so far and how systems can be improved to keep our communities safe. We have also called for the resignation of political figures such as the ex-Prime Minister Boris Johnson and ex-Health Secretary Matt Hancock following revelations that they broke the lockdown restrictions they themselves set, as by remaining in office they undermined faith in life-saving public health messaging.

We have also called on the Government to amend measures to support the families of victims of Covid 19. We have called for the NHS Life Assurance Scheme to be extended to all key

workers who lost their lives to Covid 19 (not just Health and Social Care workers) and we have continuously campaigned for the provision of a national standard of specialised Covid 19 informed bereavement support across the UK. Our campaigning in every area mentioned above has involved, but not been limited to, writing to or meeting with Ministers, providing briefings for parliamentary debates, providing submissions to APPGs and select committees and raising questions in the House of Lords and the House of Commons.

**4. A list of any articles or reports the organisation or body has published or contributed to, and/or evidence it has given (for example to Parliamentary Select Committees) regarding the impact on the group(s) which the organisation or body supports or represents of the response to Covid-19 by (a) the UK Government; (b) the Scottish Government; (c) the Welsh Government; and/or (d) the Northern Ireland Executive. Please include links to those documents where possible.**

Please find a list detailing CBFFJ's contribution to articles and reports in the enclosed schedule (Schedule 1)

**5. The view of the organisation or body as to whether the group(s) it supports or represents was adequately considered when decisions about the response to Covid-19 were made by (a) the UK Government; (b) the Scottish Government; (c) the Welsh Government; and/or (d) the Northern Ireland Executive. Please also explain the reasons for the view expressed by the organisation or body in this respect.**

Those who have lost loved ones to Covid 19 have not been adequately considered when decisions about the response to Covid 19 were made by the UK Government, the Scottish Government, the Welsh Government or the Northern Ireland Executive. As those with insights into the true human cost of the pandemic, as well as experience of the ways in which systems have failed those who have died of Covid 19, bereaved families should have been central to assessment and evaluation of the handling of the pandemic from the earliest stages. The fact that to date no lessons have been learned in this or the Scottish Inquiry, and inquiries are yet to be established in Wales and Northern Ireland speaks of failure across the UK to adequately consider and learn from the experiences of those bereaved by Covid 19 in a timely manner.

**6. Whether the organisation or body raised any concerns about the consideration being given to the group(s) which it supports or represents with (a) the UK Government; (b) the Scottish Government; (c) the Welsh Government; and/or (d) the Northern Ireland Executive, when the Government(s) and/or Executive were making decisions about their response to Covid-19. Please provide a list of any such correspondence or meetings with the UK Government, Scottish Government, Welsh Government and/or the Northern Ireland Executive, including the dates on which the body or organisation wrote or such meetings were held, to whom the correspondence was addressed or with whom the meeting was held, and any response received from the UK Government, Scottish Government, Welsh Government and/or Northern Ireland Executive addressing such concerns.**

Please find a list of CBFFJ's interventions in Schedule 2

Please find a list of the actions taken by our members as part of our campaign but also as individuals in Schedule 3

**7. A brief summary of the views of the organisation or body as to any lessons, if any, that can be learned from any consideration which was given to the group(s) that the organisation or body supports or represents by (a) the UK Government; (b) the Scottish Government; (c) the Welsh Government; and/or (d) the Northern Ireland Executive when they were making decisions about their response to Covid-19.**

Covid 19 Bereaved Families for Justice represents those who have lost loved ones to Covid 19, and have therefore suffered the very worst effects of the pandemic. There is no area of Government decision making regarding the handling of the pandemic that would not be improved through consideration of the experiences of our members. That is because 1) our members offer a valuable perspective on the systems and decisions involved in the deaths of their loved ones that are inaccessible to policy makers and 2) any meaningful and accurate evaluation of governmental and systemic performance must take into account the human cost of the pandemic and governmental failures.

8 December 2022

Covid-19 Bereaved Families for Justice UK

Broudie Jackson Canter Solicitors