

27th February 2023

Sent via email

Dear Lady Hallett,

**Re: Call for the COVID-19 Inquiry to explicitly investigate structural racism in all modules**

We are concerned by the announcement during the latest hearing of the COVID-19 Inquiry that structural racism will not be explicitly considered in Module 1, despite multiple requests for the Inquiry to interrogate why Black and minority ethnic people contracted and died from COVID-19 at such starkly disproportionate rates.

The new COVID-19 mortality rates by ethnicity, [released](#) last week, reveal what we already know about the breadth and depth of race inequalities in health outcomes; that in almost every analysis of COVID-19 hospital cases, deaths and severe illness in the UK, Black and minority ethnic people are consistently over-represented. Certain communities in particular are evidenced as being consistently over-exposed and under-protected from the virus, including Bangladeshi, Pakistani, Black Caribbean and Gypsy or Irish Traveller communities.

The most recent data shows that almost all minority ethnic groups died disproportionately from COVID-19. For Bangladeshi men the death rate was 3.1 times greater than that of White British men, followed by Pakistani men (2.3 times) and Black Caribbean men (1.8 times). Meanwhile, the rate for Bangladeshi women was 2.4 times greater than for White British women, followed by Pakistani women (2.1 times), Gypsy or Irish Traveller women (1.8 times). For Black Caribbean women, the mortality rate was 1.5 times greater than for White British women.

COVID-19 is not just a health crisis; it's also a social and economic crisis. The ability to cope, to protect and to shield oneself from the virus varies vastly for people from different ethnic and socioeconomic backgrounds.

The COVID-19 Inquiry needs to focus on why those at the intersection of certain vulnerabilities, including ethnicity, disability, immigration status and socioeconomic position, were disproportionately impacted. The initial terms of reference did not include racial inequalities despite overwhelming [evidence](#) showing how disproportionately these groups suffered. We welcome the update to include "protected characteristics", following consultation with the bereaved and civil society groups. However, we know that not all people with protected characteristics suffered from and experienced the pandemic in a universal way. The Government acknowledged that ethnicity was a risk factor to contracting COVID-19, and as such the terms of reference risk being undermined by excluding the effects of structural racism explicitly at this essential early stage. By including this interrogation in Module 1, we expect a precedent to be set for structural racism to be investigated in every module of the Inquiry.

We are disheartened to learn that the Listening Exercise has been outsourced to PR companies with close ties to Government as part of an entirely separate process to the Inquiry itself. Any inquiry must place the voices of those worst affected at its core; we

expect the COVID-19 Inquiry to set up accessible consultations directly with minority ethnic communities and their representatives, to listen and then act upon their experiences.

These consultations must include undocumented migrants, who were deeply impacted by the pandemic. The UK Government's Hostile Environment policies — such as No Recourse to Public Funds (NRPF), right to rent and work checks, and NHS charging and data-sharing — worsened the effects of COVID-19 across all areas of life. These policies, which the Home Office itself concedes have a 'disproportionate impact' on people of colour, exacerbated financial insecurity, precarious employment, insecure housing and barriers to healthcare for undocumented people, at a time when access to safety and support has never been more critical.

Limiting participation for marginalised groups in an inquiry attempting to understand the reality of the pandemic precisely for these groups undermines the goals and impact of the Inquiry itself. It risks failing to address the very real barriers to access which in part explain the pandemic's disproportionate impact.

We are concerned that some groups, such as those representing migrant communities and Gypsy, Roma and Traveller (GRT) communities, have not been represented as Core Participants yet, and appear to be siloed off from issues impacting other marginalised groups. This is despite recent figures which show that over the entire pandemic period, rates of deaths from all causes were highest for Gypsy and Irish Traveller people, with men 1.6 times more likely to die, and women a further 1.8 times more likely to die of COVID than White British men. Without centring the voices of those most impacted, it will not be possible to truly place inequalities at the heart of the Inquiry and ensure any meaningful analysis of structural disadvantage.

Therefore, we are calling for the Inquiry to:

- Investigate structural racism as a key issue in every module;
- Instruct an expert witness in the field of structural racism to shed light on the state of the UK's preparedness in the lead up to the pandemic;
- Rethink the Listening Exercise and centre those most impacted in a supportive and accessible way, to enable full trust and participation in this process;
- Ensure migrants' rights groups and Gypsy, Roma and Traveller (GRT) communities are represented as Core Participants.

Unequal health outcomes are not confined to the pandemic, and longstanding racial and economic inequality is at the heart of understanding it. It is precisely because these inequalities are so systemic and interlinked that, when a crisis hits, certain communities are impacted first, the hardest and in multiple ways. Until we dismantle the factors which enabled the pandemic to be racialised in its impact, we cannot mitigate a similar outcome from any future crisis responses. This must be a central interrogation point for the COVID inquiry, with affected communities placed firmly at the centre.

Signed,

**Covid Bereaved Families for Justice  
Runnymede Trust**

**Action for Race Equality**  
**Asylum Matters**  
**Bail for Immigration Detainees**  
**Black Equity Organisation**  
**Black Men 4 Change**  
**BME Forum**  
**Caribbean and African Health Network**  
**Community Policy Forum**  
**Council of Somali Organisations**  
**Doctors of the World UK**  
**Friends, Families and Travellers**  
**Guy's and St Thomas' Foundation**  
**Institute for Public Policy Research**  
**Jewish Council for Racial Equality**  
**Joint Council for the Welfare of Immigrants**  
**Lancashire BME Network**  
**Medact**  
**Migrants Organise**  
**Migrants' Rights Network**  
**National Windrush Organisation**  
**NHS BME Network**  
**Race Equality Foundation**  
**Refugee Action**  
**Traveller Movement**  
**Ubele Initiative**