

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

Application for Core Participant status on behalf of the Covid 19 Bereaved Families For Justice Group for MODULE 3.

Application to be appointed Recognised Legal Representative on behalf of the above named UK Group for MODULE 3

1. Covid 19 Bereaved Families For Justice (CBFFJ) began as a campaign group of family members bereaved by Covid 19 who met through a Facebook page in about April 2020. The group subsequently formalised into a limited company: CBFFJ Ltd. The Group has always been and remains UK-wide. The Facebook group currently has about 6,600 supporters. Of those 3,461 have signed-up as members (including 69 from NI, 207 from Scotland, and 177 from Wales).
2. Broudie Jackson Canter solicitors (hereafter BJC) and a group of counsel (together ‘the central team’) has acted for the group since its inception, and also for a large number of individuals bereaved by Covid, in their own right, who are almost all members of the group. So far as the history of CBFFJ and its branches is concerned we rely upon but do not repeat the narrative set out in our application in respect of Module 1, at paras 8-30 (dated 16 August 2022).
3. This is an application for Core Participant (CP) status for the UK-wide CBFFJ group, for Module 3, pursuant to Rule 5(1) of the Inquiry Rules 2006. The group and bereaved individuals plainly have an obvious and significant interest in numerous important aspects of the matters to which the Inquiry relates generally, and to this Module in particular: Rule 5(2)(b). We dealt with general matters which underpin the applications of the bereaved families at para 31-4 of the application for Module 1 and we again rely upon those points without needless repetition.
4. Module 3 relates to health systems, including capacity of health services to respond to the pandemic, including, per the Provisional Scope, *"people's experience of healthcare during the pandemic through illustrative accounts"*. Many of the CBFFJ group's members lost relatives in healthcare settings during the pandemic. The CBFFJ group has a health and social care sub-group who meet remotely monthly and take a keen interest in all matters relating to Covid-19 and healthcare. Many of the group have personal experiences of the use of treatments for Covid-19; availability of critical care; NHS 111;

ambulance services; admissions to and discharges from hospitals; the use of 'do not attempt resuscitation' decisions; infection prevention and control in NHS settings; adequacy of PPE for healthcare staff.

5. The group also has a BAME sub-group for whom inequitable healthcare provision, and ethnic disparities among those who died of Covid-19 are of great concern. Granting the CBFFJ group CP status in Module 3 is important to enable them to effectively participate in this part of the inquiry.
6. Elkan Abrahamson of BJC should be designated as the RLR for the CBFFJ (UK) group, as he has been for Modules 1 and 2.
7. In summary, CBFFJ seeks CP status for Module 3, with Elkan Abrahamson as RLR.. The families and legal team will continue to work in concert with CBFFJ (NI) as per our working agreement, and will endeavour to work with all other CPs who have similar or concurring interests, ensuring efficiency and avoiding a disproportionate burden on public resources

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