



Mr Asif Karolia  
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Date: 22nd March 2021  
Tel: 01254 585585  
Please ask for:  
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Dear Mr Karolia

### **Complaint against Covid Secure Audits**

Thank you for your letter dated 18<sup>th</sup> March 2021 which raises concerns about the way the Council has interacted with your organisation, and others in the community. I will address your specific concerns individually, but feel it would be appropriate to provide some context before I do.

Throughout the pandemic, Blackburn with Darwen has had a higher number of COVID-19 cases than any other borough in the country and this has resulted in many families losing loved ones to the virus.

The pandemic has been with us for a year now, and throughout this my public protection officers have carried out well over 5000 interactions with organisations of all types with the sole aim of preventing the spread of covid-19, and therefore protecting lives of our residents. Given the fact that Blackburn with Darwen has been subject to restrictions longer than any other Borough, these officers have developed experience in the implementation of covid-secure measures which is second to none, and seek to pass that experience on whenever they can.

Although the Council has taken a fairly robust approach to enforcing covid-secure provisions in general, it has taken a very different approach to the faith sector, and particularly mosques. You will remember the face to face training that my officers provided with the support of the LCM in July 2020, the free covid-secure audits which were provided, and the refresher training which was provided in November 2020. This level of engagement has been unprecedented in the delivery of our covid-secure regime.

At the beginning of 2021 Council received a number of complaints from the Muslim community in regards to covid-standards in Mosques. In response to this intelligence, Council officers conducted a review of covid-secure measures across all faith settings in the Borough, including mosques. These visits were not enforcement based and were done with the intention to support the faiths settings. Most churches and other faith settings were found to be closed, and the ones which were open were found to be covid-secure.

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Audits at mosques showed a different picture and not all mosques were found to be compliant with all the covid standards.

The Council has always targeted its resources at areas of highest risk, this includes the hospitality sector e.g. cafes, takeaways, pubs and clubs and other areas e.g. gyms, or close contact services. The audit work which is currently being undertaken at mosques is no different.

The Council recognises that Places of Worship remained closed to the public during Ramadan last year following the Government's decision on extending the lockdown. Thankfully this year, Places of Worship can remain open but it is imperative that they provide a covid secure environment throughout Ramadan, as the attendance at Mosques during this period is vastly increased. It is our duty to protect our citizens and avoid further increases in coronavirus cases in all settings.

While enforcement has never been considered necessary in relation to mosques, it is a fact that legislation exists to protect the public from the spread of covid and would be viewed as a sanction of last resort where risk could not be reduced by engagement.

To address your specific concerns:

#### **CONCERN 1: FAILURE TO DISTINGUISH BETWEEN REGULATIONS (LAW) AND GUIDANCE AND INCONSISTENT AND CONFUSING WORDING**

It is important to understand that the letter sent was an audit report, not an enforcement letter. Although there was mention of the Council's direction powers, this was not directly linked to the individual findings of the audit. The terminology reflects officers' experience and perception of risk. The Council's view is that the increased transmissibility of the mutated strains of covid-19 render 1 metre social distancing inadvisable and puts the congregation at risk. Our letter dated 5<sup>th</sup> March 2021 says, to try to keep people 2 metres apart at all times.

Throughout the pandemic the Council has advised that organisations should do what they should, rather than what they can. The Council regards mosques as responsible organisations who are committed to protecting their congregations, and advice is given with this assumption in place. This guidance of 2 metre social distancing is also advised by the Muslim Council of Britain.

#### **CONCERN 2: FAILURE TO ACKNOWLEDGE FACE-MASK EXEMPTIONS**

The council has issued in its update to Mosques dated 5<sup>th</sup> March 2021 that face coverings are worn by everyone in the mosque unless an exemption applies.

#### **CONCERN 3: FAILURE TO ACKNOWLEDGE THAT 1 METRE DISTANCING IS LAWFUL**

I refer you to my answer to concerns 1 and 2 above. In the context of the increased transmissibility of new covid strains, combined with the fact that exempted individuals do not

wear face coverings, and we had concerns about face covering use in general, in the Council's view 1 metres social distancing does not adequately protect members of the congregation.

We would also refer you to Muslim Council of Britain's Ramadan guidance where 2 metre is advised.

#### CONCERN 4: LOCKING THE DOORS OF THE MOSQUES

The letter specifically acknowledges risks; it states 'However, doors should not be locked if it would compromise fire safety requirements.'

#### CONCERN 5: DIRECTING PEOPLE TO THE TOILET

Council officers have seen several instances where toilet facilities have been left unsupervised, and this results in increased requirements for cleansing e.g. the whole of the facility would require cleansing as the exact toilet/taps etc used would not be known. The suggestion for people to be directed was made to relieve the mosque and its volunteers of unnecessary work.

#### CONCERN 6: QURANS SHOULD NOT BE PROVIDED

An updated issued to mosques on 5<sup>th</sup> March 2021 following discussions with several mosques, now reflects the guidance that outlines the introduction of a system of quarantine between uses.

#### CONCERN 7: THE COUNCIL OFFICERS ARE NOT THE JUDGES

Council officers have developed significant experience in the reality of covid security, and have come to understand that covid security is only as good as the behaviour of individuals attending worship, or customers in the context of other settings etc. This is often not appreciated by the organisations we visit, which is why we stress the measures that we do. Officers can only respond to what they see at the time of the visit, and advise accordingly. This was not an enforcement situation, so there is no question of 'judging'.

#### CONCERN 8: SOCIAL DISTANCING

I refer you to my answers for Concerns 1 and 3.

#### Muslim Council of Britain guidance to Mosques

Mosques guidance can be found via this link [9 Steps to Re-Opening Mosques Safely](#) and Ramadan safety guidance can be found at this link: [Ramadan Safety Guidance](#).

## BLACKBURN MOSQUE UNFAIRLY TARGETED BY THE COUNCIL

You are incorrect when you say that the Jamia Ghosia mosque was targeted by the Council. The mosque decided to inform its congregation and closed the mosque without Public Health or Council guidance. The Council subsequently supported the mosque through its outbreak control processes and in communicating the situation more widely.

<https://theshuttle.org.uk/statement-following-covid-19-outbreak-management-review-of-mosque-incident/>

We have been working hard to support the Muslim community and have continuously looked at what more we can do. An example of this has been with regards to Janazah prayers and numbers. We note that your faith setting, Jaame Masjid, Islamic Cultural Centre facilitated a Janazah prayer immediately after a Fard prayer in February 2021.

## RECOMMENDATIONS

1. The Council should engage constructively and directly with grassroots organisations like ours and understand and appreciate the practical challenges before issuing advices and threats. We are ready to engage with the Council in this regard. Our shared mission is to safeguard all the people of our borough.

The Council holds regular meetings with leaders of the Muslim community and consistently acts on advice which comes from these meetings. The extensive covid-secure training provided by Council officers was organised with the assistance of the LCM.

Furthermore, the covid-secure visits have been direct engagement with faith organisations and these have been provided in the spirit of support and assistance.

2. The Council should acknowledge its failure in providing adequate and correct guidance to Places of Worship.

I would request that you acknowledge the extensive practical experience in covid security that Public protection Officers have developed over the last year, and read the letter in the spirit in which it was intended; i.e. to support the mosque to protect its congregation.

3. The Council should provide a detailed response to all of the issues raised in this letter and provide clarification from the Regulation and Government Guidance.

Please see comments above.

4. The Council should set the record straight in relation to the Jamia Ghosia Mosque incident and confirm that it did not breach Covid-19 rules.

Please see comments above.

5. The Council should avoid any actions in the future that unfairly targets one community.

Our faith communities have worked tirelessly since the beginning of the pandemic to keep people safe, and we applaud all their efforts. We appreciate that the coming weeks and months will be significant for many faith communities, especially as they may not have been able to celebrate these important festivals last year.

The Council has been working in partnership with Lancashire Resilience Forum and its cells and others board to engage with all partners. In particular the BwD Local Outbreak Engagement Board and Muslim Community life and event Board, LRF Faith cell, LRF BAME cell which includes representation by Lancashire Council of Mosque, many other Muslim community representations, and other Muslim representatives to deal with Covid related issues.

We have been working with all our communities and all faith organisations throughout this pandemic. We have supported, encouraged, and thanked many; including highlighting the fantastic work, they have done to support our communities in BwD and beyond. We have published many articles and reported widely the positive work of the community and faith sector, including Mosques and the Muslim community.

These are just some examples:

- <https://theshuttle.org.uk/mosques-use-technology-to-help-communities-pray-at-home/>
- <https://theshuttle.org.uk/reassuring-muslim-families-of-burial-safety/>
- <https://theshuttle.org.uk/helping-put-food-on-the-table-during-the-coronavirus-crisis/>
- <https://theshuttle.org.uk/partners-support-vulnerable-people-through-covid-19-crisis/>
- <https://theshuttle.org.uk/new-grants-to-help-keep-you-warm-this-winter/>
- <https://theshuttle.org.uk/funding-boost-helps-free-meals-partnership-keep-cooking/>
- <https://theshuttle.org.uk/council-and-partners-join-forces-on-community-coronavirus-work/>
- <https://theshuttle.org.uk/preparing-for-a-different-kind-of-ramadan/>
- <https://theshuttle.org.uk/advice-on-staying-safe-this-eid-al-adha/>
- <https://theshuttle.org.uk/an-interfaith-message-for-eid-in-lockdown/>
- Call to Prayer on final Friday of Ramadhan 2020 and Eid Day.
- Facilitation of late night burials at Pleasington cemetery
- The work of the Blackburn Muslim Burial Society, mosques and volunteers

In addition, there are many other community and faith organisations including Mosques who have had positive media coverage for their work during the pandemic.

We know that Mosques have risk assessments and measures in place to control the spread of covid-19, and we have seen the valuable role volunteers play in promoting social distancing and encouraging compliance with COVID-19 public health measures. We encourage you to keep up your efforts to support your congregations whilst we are going through the pandemic.

We know from the data of positive cases, hospitalisations and deaths that BAME group have been disproportionately affected from covid. We have a policy of avoiding blame and stigmatisation and our strategy is to work, support, share advice and promote best practice so that we can manage the risks of covid and its impact on our communities.

We trust that my explanation makes it clear that the Council's actions have been proportionate and have not unfairly targeted one community. I am satisfied that with limited intervention this will be remedied.

We trust that this letter adequately clarifies the Council's position in relation to the audits which are taking place, and the audit which took place at your premises.

We must also add that Public protection officers alongside other council officers have worked as hard as anyone in the Council to protect members of the community. Public Protection officers have been trained to deliver this service. We feel it was undignified to single out one individual officer. At all times we have treated each visit professionally, privately, shown dignity and respect to the people we have been working with and in the vast majority we have had their co-operation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Martin Eden', with a stylized flourish at the end.

Martin Eden  
Director of PLACE