**Common questions**

**Impact on human rights**

* **Please explain the impact of the pandemic on the enjoyment of human rights and what actions have been taken by the State to respect, protect and fulfil human rights?**

The Covid-19 pandemic and the UK Government’s response has constrained the fulfilment of human rights in the UK as lockdown measures have differentially impacted social groups according to their class, race or ethnicity, immigration status, gender and ability. Individuals with intersecting disadvantages - particularly racial and ethnic minorities and those with insecure immigration status who are more highly concentrated in poor quality, densely populated housing and low paid, frontline work - have been disproportionately impacted by the virus, which has replicated and increased existing health inequalities in the UK.[[1]](#footnote-1) The government’s ‘hostile environment’ policies including the NHS surcharge and data-sharing with immigration enforcement have prevented migrants from accessing healthcare due to the risks of being exposed to immigration control, detained and removed from the UK as well as lack of language and digital inclusion and the prohibitive cost of care.[[2]](#footnote-2)

ECPAT UK works with and on behalf of unaccompanied children and young people who have been affected by child trafficking. The pandemic and the government response has exacerbated existing inequalities in access to rights and entitlements for this vulnerable group, who face structural barriers to support in the UK including immigration precarity, unequal access to education and discrimination in support and care. It has also created new risks for this group of children and young people to go missing from statutory care services and be re-trafficked[[3]](#footnote-3). Through our direct support of young victims of trafficking, ECPAT UK has identified the significant factors driving these new risks are lack of contact with key support workers; confinement to a residence trigging re-traumatising memories of exploitation; lack of clear, trustworthy information in young people’s own languages; delayed subsistence payments; delays to decisions on asylum cases and National Referral Mechanism outcomes on their official status as victims of trafficking; lack of access to electronic equipment to continue education and to remain connected to peers and support services; and inappropriate accommodation in which to remain safe from the virus. Additionally, during the pandemic children are spending more time online, leaving them exposed to risks of contact with criminals seeking to sexually, criminally or financially exploit them.[[4]](#footnote-4)

* **Are there any measures put in place in your country following the pandemic which have had a limiting effect on human rights? If so, please list them, provide an explanation for their adoption and indicate the time-frame by which they will be lifted?**
  1. **Were these measures determined by law? If yes, please indicate the relevant legislation.**

The UK Government introduced the Adoption and Children (Coronavirus) (Amendment) Regulation 2020 (SI/445/2020) [[5]](#footnote-5) to provide child protection workers, local authorities, providers, agencies and partners with the flexibility to meet their statutory duties to children in care amid national lockdown measures prohibiting in-person contact between individuals residing in disparate households. The temporary regulations are in effect until the 25th September 2020 but due to certain conditions contained therein their effect will continue beyond that date for some children and subject to review of their effectiveness they may continue after 25 September 2020, should the pandemic last longer than this.

However, the legislation has removed and weakened 65 legal protections for vulnerable children under the care of the State, including looked after children who are seeking asylum and child victims of trafficking. The statutory instrument was passed without the necessary time period for Parliamentary scrutiny and debate, and without public consultation, having been laid before the House of Commons and the House of Lords on the 23rd April, and came into force on the 24th April.   
  
Some of the key safeguards that have been diluted are: visits to each child every six weeks are no longer mandatory, not even via telephone, and instead must be carried out ‘as soon as reasonably practicable’ which is vague and open to interpretation; the duty to hold six-monthly reviews of children in care has been removed; safeguards for children placed out of their local area with people who are not connected to them have been removed; safeguards relating to short breaks, which particularly affects disabled children, have been lost; independent scrutiny and other safeguards have been relaxed relating to adoption; and the duty on children’s homes to ensure independent visits and reports on children’s welfare has been diluted.

The significant dilution of important corporate parenting duties to visit and maintain contact with children will result in the voices of these children and young people being further silenced and their needs being completely overlooked. For this vulnerable group of children and young people affected by or at risk of exploitation, the loss of support is all too often associated with increased future risks of destitution, harm, exploitation and deterioration in their mental health. A broad coalition of professionals and organisations working for children’s rights[[6]](#footnote-6) are concerned about the deleterious impact of this legislation on children’s fundamental rights to protection at a time when they are more vulnerable than ever.

* 1. **Why were these measures necessary to respond to the COVID-19 situation?**

In its Explanatory Memorandum to the legislation, the government stated that the temporary changes to regulations were made to enable children’s social care services to manage the coronavirus outbreak “the increased pressure on children’s social care and staff and carer shortages who are ill with coronavirus”. [[7]](#footnote-7) It states that the changes “prioritise the needs of children, whilst relaxing some administrative and procedural obligations to support delivery of children’s services but maintaining appropriate safeguards in such extraordinary circumstances”. In short, the regulations provide greater flexibility to children’s social care workers to carry out their duties amid the nationwide government-imposed public health restrictions with a view that the most vulnerable would receive additional support. Child victims of trafficking are some of the most vulnerable groups of children in care and there is no evidence to show they received additional support, on the contrary, many charities and service providers report a significant drop in support for many of these children.

* 1. **Were these measures proportional in view of their expected results to counter the pandemic?**

It is the view of ECPAT UK and many other professionals and organisations working in support of children’s rights that these changes are disproportionate given the significant risks to looked after children in local authority care.

The House of Lords Secondary Legislation Scrutiny Committee reviewed the legislatory changes, concluding they ‘make extensive changes to a very sensitive policy area’.[[8]](#footnote-8) It is to be expected that changes to this policy area would be adequately scrutinised. However, while ministers claimed the legislatory changes were made in response to requests from those working in children’s social care, the charity Article 39 has obtained correspondence demonstrating that the Department for Education decided to review “all relevant children’s social care regulations” prior to selecting a number of organisations and individuals for private consultation. Four of the five organisations consulted have publicly denied requesting the changes.[[9]](#footnote-9) Moreover, there are concerns about the long-term impact of the changes, with certain provisions in the new regulations set to outlive the expiry date, and the likelihood of life-changing decision-making to have long-term consequences for individual children in care. There are also concerns that the regulations may form part of a broader agenda to deregulate children’s social care, per previous attempts to pass similar bills prior to the coronavirus pandemic.[[10]](#footnote-10)

* **What long-term impacts of the pandemic and its response measures are expected on the enjoyment of human rights?**

Certain provisions in the new regulations to children’s social care are set to outlive the expiry date, and life-changing decision-making is predicted to have long-term consequences for individual children in care.[[11]](#footnote-11)

**Statistical information**

* **Please provide epidemiological data on COVID-19 infections, recovery and mortality rates in your country, region or locality, disaggregated by nationality, race, ethnicity, religion, membership of indigenous peoples, age, gender, sexual orientation and gender identity, income/poverty levels, disability, immigration status or housing situation. Which groups in your country have been disproportionately affected by COVID-19 and how can this be explained?**

The largest disparity among outcomes relates to age, with those aged 80 or over seventy times more likely to die from Covid-19 than those under 40.[[12]](#footnote-12) With regard to disparities relating to unequal enjoyment of human rights, protections and other inequalities, those living in lower-income areas and those from black and ethnic minority communities have been disproportionately impacted by Covid-19 and have higher mortality rates.[[13]](#footnote-13) This broadly mirrors existing disparities and inequalities in health care provision and health outcomes among ethnic communities in the UK; however a greater number of individuals from black and minority ethnic (BAME) communities, and those born outside the UK, have died than in previous years. This is due to deeply embedded structural inequalities and institutional racism, which leaves these communities more, exposed to the virus and less able to protect themselves from it.[[14]](#footnote-14)

Government policies and structural racial inequalities have resulted in BAME communities disproportionately experiencing poverty, precarious employment and overcrowded housing in lower-income areas. These socio-economic conditions have resulted BAME workers being unable to socially distance effectively due to their unequal distribution in lower paid, frontline jobs classed as ‘key workers’ or their reliance on precarious work due to lack of eligibility for social protection payments. These factors increased their exposure to the virus. Moreover, these socio-economic conditions have a causal effect on the comorbidities that increase susceptibility to the virus. Finally, the government’s hostile immigration control policies - including the NHS surcharge and data-sharing agreement with immigration enforcement - have prevented migrants from accessing healthcare due to the risks of being exposed to immigration control, detained and removed from the UK, as well as lack of language and digital inclusion, the prohibitive cost of care and historic racism in treatment.[[15]](#footnote-15)

**Questions by the Special Rapporteur on contemporary forms of slavery**

1. **What is the impact of the COVID-19 crisis on contemporary forms of slavery, including descent-based slavery; forced labour; debt bondage; serfdom; sexual slavery; commercial sexual exploitation of children; child labour; domestic servitude; and servile forms of marriage?**

Children and young people who are victims or survivors of modern slavery have been disproportionately affected by the government response to Covid-19 crisis. Both UK national child victims and child victims who are seeking asylum or who have irregular migration status have been impacted. In particular, those who are seeking asylum or have irregular migration status in the UK are highly unlikely to have family members or social networks in the UK to advocate for them, visit them or meet their ongoing practical, social or emotional needs. They are reliant on their corporate parents and social workers for care and support.

The Covid-19 crisis has exacerbated pre-existing crises in social care and local authority funding, resulting in failures to meet statutory duties to safeguard and promote the welfare of children and young people in care, and former relevant children, including unaccompanied child survivors of modern slavery. These young people were already facing great challenges in access to support and care prior the pandemic. The uncertainty and serious risk to life brought about by the pandemic and meant their needs as young survivors of trafficking and exploitation has increased while the government’s response and support available to them from local statutory agencies has decreased. While there may not yet be complete datasets and analysis of the impact of Covid-19 on victim recruitment, a significant impact of the pandemic is the increased vulnerability of survivors to further exploitation and the increased vulnerability of those in high risk groups such as unaccompanied children with insecure immigration status to further recruitment.

**Re-traumatisation caused by isolation**The restrictions that have been imposed to control the Covid-19 pandemic have created a sudden withdrawal of much of the support they rely on for their physical and psychological health and wellbeing including schools and colleges, clubs, community centres and other social groups, and a significant reduction in access to counselling and other forms of therapeutic work or mental health services, as well as decreased access to social workers. ECPAT UK and other organisations working with this group of young people have observed that the loss of tangible support and the consequential social isolation, compounded by the significant restrictions on movement, have re-traumatised young people whose experiences of exploitation or journeys to the UK entailed similar experiences of social isolation and physical confinement. In the absence of the emotional and psychosocial support they had prior to the pandemic, young people are reporting nightmares, flash backs and panic attacks. Some are struggling to control episodes of depression and suicidal ideation. Their need for mental health support and trauma care is increasing at a time when access to this support is diminished.[[16]](#footnote-16)

**Insecure accommodation**   
Many young survivors are housed in unsuitable accommodation where they do not feel safe The current conditions have exacerbated this as young people cannot adequately self-isolate. Unaccompanied children and children who have been exploited are already at a higher risk of going missing from care,[[17]](#footnote-17) which can indicate exploitation and re-trafficking. Unaccompanied children, including survivors, are six times more likely to live in unregulated semi-independent accommodation[[18]](#footnote-18), where there were pre-existing concerns around support levels prior to the pandemic.[[19]](#footnote-19) Evidence from ECPAT UK and other organisations providing direct support to young people highlights young people are going missing from statutory support agencies during this period following long periods of no contact with support workers or severe delay to subsistence payments.[[20]](#footnote-20) ECPAT UK and other organisations support survivors have also observed increased risks of homelessness for survivors as statutory accommodation services and other accommodation providers refused entry to new referrals due to concerns around spreading the virus.[[21]](#footnote-21)

**Lack of access to the Internet and education**A number of young survivors we work with aged 14–21, in full time education, have been unable to continue with school or college work because they lack access to laptops, WiFi or support in liaising with schools. Prior to the Covid-19 pandemic, they accessed computers and WiFi at their educational institutions during the week and used public library facilities at weekends. As children across the country access learning online, many survivors are therefore excluded from learning. Moreover, lack of camera phones and Internet connections has prevented some child survivors from accessing support groups taking place online. Lack of WiFi access means some young people are spending as much as £10 per day on credit to remain in contact with support services and may be forgoing food and other essentials.

**Weakening of legal protections for children in care**The UK Government passed the Adoption and Children (Coronavirus) (Amendment) Regulation 2020 (SI/445/2020) without parliamentary scrutiny or public consultation.[[22]](#footnote-22) It removed or weakened 65 legal safeguards for vulnerable children in care, including victims and survivors of child trafficking. ECPAT UK has observed that the significant dilution of important corporate parenting duties to visit and maintain contact with children, in addition to the lockdown conditions, have contributed to a number of young survivors of trafficking going missing from care, feared re-trafficked.

**Lack of clear health information**There has been incoherent, unclear public health information during the pandemic, particularly in the languages and child-friendly styles that are accessible to young victims of modern slavery. This leaves victims at risk of misinformation and online financial scams. Furthermore, most of the young people we work with are black and minority ethnic and are aware of the disproportionate impact of Covid-19 on them[[23]](#footnote-23) without any information about why nor any mitigation of its impact. This has meant that their level of concern and fear are heightened and that they are fearful of seeking medical care if they are symptomatic.

**Reliance on charities**Charities on the ground working with children and young people have filled gaps in statutory responses to access urgent and basic needs such as food, human contact and emotional support; including mobile phone credit, laptops, WiFi and online counselling and befriending. However, survivors living outside of major cities may lack access to charity support services and remain completely hidden from authorities and at significant risk of re-trafficking or harm. The impact on the pandemic on civil society capacity and funding has also meant reduced support for children when their vulnerabilities are exacerbated.   
  
**Domestic Exploitation**Children and young people, including those who are looked after children and those in the care of their parents, have also been negatively impacted by the Covid-19 crisis and government response. Lack of contact with key workers has created opportunities for organised criminal groups to target child survivors or at risk children for criminal exploitation such as drug supply during the lockdown.[[24]](#footnote-24) Organised criminal groups have adapted their operations under the lockdown, capitalising on the reduction of staffing of frontline agencies to use children and young people posing as key workers to avoid detection by authorities.[[25]](#footnote-25) Restrictions of movement have therefore not reduced this form of exploitation; rather it has driven changes in patterns of behaviour, with victims less visible than before.[[26]](#footnote-26) Additionally, the increased time children are spending online during the lockdown, particularly for those struggling with isolation, has driven increases in the number of children groomed or sexually exploited online.[[27]](#footnote-27)

All of the above factors have left children and young people affected by or at risk of modern slavery isolated, fearful, lacking the resources to meet their basic needs, unable to access mental health support and highly vulnerable to going missing and facing further exploitation. The current situation undermines their recovery and exposes them to unnecessary and disproportionate risks of re-trafficking, exploitation, abuse and deterioration in their physical and mental wellbeing. Moreover, current (in) action by central government and local statutory agencies falls short of obligations to fulfil and uphold child survivors’ rights and entitlements under domestic legislation including the Children Act 1989 and international treaties including the UN Convention on the Rights of the Child.

1. **What steps have been taken by the Government to reduce increased risks of contemporary forms of slavery in the context of the outbreak? Please, share any good practices and identify persistent challenges, including with regards to prevention; identification of victims; provision of access to recovery and rehabilitation services; and investigation and prosecution of slavery-related crimes.**

The government has committed funding to tackling child exploitation, however its response has focused primarily on on-line grooming and exploitation of children. Attention has been given to child criminal exploitation in drug supply, often referred to as ‘county lines’[[28]](#footnote-28) however, the response has focused primarily on law enforcement responses rather than a national strategy which resources public health approaches to this most egregious form of child abuse. Provision of access to recovery and rehabilitation services has been impacted by reduced staffing capacity.[[29]](#footnote-29) There are concerns that already vulnerable people, including migrants and survivors of trafficking with precarious migration status, are at increased risk of labour exploitation as workers lose their jobs and are made destitute.[[30]](#footnote-30) In ECPAT UK’s experience of direct support for young survivors, many are vulnerable to these precarious types of employment including those that are exploitative, particularly if their migration status is insecure.   
  
There have been attempts to reduce both smuggling and trafficking into the UK by restricting access to national borders, including the main shipping ports into England, however this has not stopped attempted crossings, the number of which significantly increased in the first five months of 2020 to more than the total for 2019.[[31]](#footnote-31) It is well established that strict border regimes force vulnerable migrants into the hands of organised criminal smuggling groups who may seek to exploit or abuse. In addition, the UK has not stepped up efforts to protect children in migration at risk of exploitation across Europe in response to worsening conditions in camps across Europe and Calais due to the coronavirus. Even children who have been legally accepted for transfer to join family in the UK remain trapped on the islands in Greece.[[32]](#footnote-32) Meanwhile in Calais, conditions worsen with fewer services available.[[33]](#footnote-33)

1. **In light of the Sustainable Development Goals and global commitments to eradicate slavery (target 8.7) and measure progress in this area, has the Government been able to ensure timely collection and analysis of disaggregated data? If available, please share the data collected in the first quarter of 2020, including information regarding the number, age, gender and nationality of identified victims; number of prosecution of perpetrators; types of services provided to the victims; industries where victims were identified. Has any of these data significantly varied from previously recorded trends due to factors related to the COVID-19 pandemic?**

While the UK Government collected and released disaggregated data on victims of modern slavery and trafficking for the first quarter of 2020, the numbers fell for the first time in four years.[[34]](#footnote-34) This contradicts a general trend of increases to potential victims identified year on year. However, it is unlikely that the number of victims has decreased; particularly with those who are already vulnerable, including migrants and those with insecure migration status, pushed into precarity by job losses. The Home Office acknowledged the decrease to be impacted “by the effects of restrictions implemented in the UK as part of the response to the Covid-19 pandemic”.[[35]](#footnote-35) Other contributing factors are broadly accepted to be the closure or reduced activity of frontline services that identify victims or offer opportunities for victim disclosures and the reduced visibility of exploitative situations during the lockdown. We must therefore conclude that the adequate collection and analysis of disaggregated data has been impeded by the pandemic.

**Questions by the Special Rapporteur on the sale and sexual exploitation of children**

The report of the Special Rapporteur on the sale and sexual exploitation of children will explore how the COVID-19 crisis threatens to further erode the situation of children most vulnerable to sale and sexual exploitation. The report will focus on identifying push and pull factors, scaling up good practice, and providing recommendations on the measures to address the heightened risks of sale and sexual exploitation of children, during and in the aftermath of the pandemic. The recommendations of the report will seek to: operationalize the pledges made under Agenda 2030 as far as they relate to SDG targets 5.3, 8.7 and 16.2. and ensure implementation of effective child protection responses arising in the context of emergencies.

1. **What is the impact of COVID-19 crisis on the nature and scope of various manifestations of sale and sexual exploitation of children, including sexual exploitation and abuse of children, both online and offline; child marriage; trafficking of children; surrogacy and sale of children; illegal adoptions and child labour?**

* **What are the new forms and manifestations of sale and sexual exploitation of children in the context of COVID 19 crisis?**
* **What are the key trends and accelerators in the context of the pandemic that may increase children’s vulnerability to the sale and sexual exploitation?**

The Covid-19 crisis has caused children to spend increased time online, as restrictions on movements has meant schools, clubs and outdoors activities are closed or prohibited. As children spend more time online, organised criminal groups and opportunistic offenders have increasingly targeted children for sexual exploitation.[[36]](#footnote-36) Europol, the EU’s law enforcement agency has reported a rise in activity around the distribution of child sexual exploitation material online.[[37]](#footnote-37) A survey of children by the NSPCC found children experiencing loneliness during the lockdown were twice as likely to be groomed for sexual abuse and exploitation online.[[38]](#footnote-38) There are gaps in the UK’s response to online child exploitation and inadequate regulation of Internet companies such as social media platforms frequently used by children. Opportunities to strengthen protections for children online were missed when the government failed to implement the recommendations of the 2019 Online Harms White Paper and create a robust regulatory framework for Internet providers[[39]](#footnote-39), failed to implement the Information Commissioners’ Office Age Appropriate Design Code which was only belatedly laid before Parliament in June 2020[[40]](#footnote-40) and delayed implementing Part 3 of the Digital Economy Act 2017 which brought into law additional safeguards for children online including age verification processes and protections related to sexual exploitation imagery.[[41]](#footnote-41) These delays or failures to act have created an online environment, which is less regulated and less equipped to protect children from exploitation than they might have been.

Moreover, child criminal exploitation by gangs has not stopped, despite restrictions on public transport.[[42]](#footnote-42) It’s important to highlight this is the form of primary exploitation identified, but children are often polyvictimised and may be victims of sexual abuse and exploitation, which is not identified. The closure of schools poses a risk to children being targeted by traffickers for various forms of exploitation; particularly those who are not safe or cared for in their home environments and seek escape. While it is welcome that schools have remained open to children in care, many vulnerable children who are not necessarily under the care of a local authority may nonetheless be exposed to exploitation without access to school, particularly if they are under pressure to make money. It is likely that the full extent of new or worsened levels of child exploitation will only be revealed once lockdown measures have been lifted and children can access regular support channels.

Children in migration are at significantly heightened risk of sexual abuse and exploitation. With the pandemic driving reductions in travel, closed borders and almost no safe and legal routes into the UK, children have been left with little choice but to make dangerous journeys. There were limited cases of transfers of unaccompanied children, under the Dublin regulations, to join family members in the UK. The government reports this was due to the difficulty in organising social worker assessment of receiving family members[[43]](#footnote-43). Outside of family reunification, the UK has not stepped up efforts to protect children in migration at risk of exploitation across Europe in response to worsening conditions in camps across Europe and Calais due to the coronavirus. Meanwhile in Calais, conditions worsen with fewer services available.[[44]](#footnote-44) The increased precarity of those children in migration leads to increased vulnerability to sexual abuse and exploitation both on their journeys and in destination countries. Again, it may be months or years until we are able to assess the true scale of the impact of Covid-19 on child trafficking, given the invisibilised nature of these crimes.

1. **What essential protection measures, including identification, reporting, referral and investigation, have been put in place to detect and prevent child sexual abuse and exploitation cases and how effective have they been since the outbreak?**

In April, the Department for Culture, Media and Sport published new guidance to help Internet users to stay safe online during the coronavirus outbreak, with more detailed information for parents and carers,[[45]](#footnote-45) as well as a joint new government resources page on online child safety. On the 11th June 2020, following three months of lockdown measures in which children spent increased time online and agencies reported increased risks of online child exploitation, the Information Commissioner’s Office Age Appropriate Design Code was finally laid before parliament; setting out 15 standards to increase protections and privacy for children when using the Internet.[[46]](#footnote-46) Provided the Code is not prayed against during the 40 days that follow, it will come into force 21 days later, with a transitional period of 12 months before the code comes into effect.

However, the recommendations set out in the 2019 Online Harms White Paper have yet to be progressed through parliament; leaving children vulnerable to an under-regulated online environment. At the time of writing, a Bill has yet to be brought to parliament, however government officials have made verbal commitment to progressing this. A major focus of the bill is set to be Internet companies’ duty of care to children and the requirement for companies to honour their terms and conditions of service.

1. **Have there been any initiatives on collecting disaggregated data on specific forms and manifestations of sale and sexual exploitation of children during the pandemic and assessing the near and long-term impacts of COVID-19?**

While the UK Government collected and released disaggregated data on child of modern slavery and trafficking including those whose primary from of exploitation was sexual exploitation, the numbers of those identified fell for the first time in four years.[[47]](#footnote-47) This contradicts a general trend of increases to potential victims identified year on year. However, it is unlikely that the number of victims has decreased; particularly with those who are already vulnerable, including looked after children, child victims of other forms of abuse, children with disabilities and migrant children. The Home Office acknowledged the decrease to be impacted “by the effects of restrictions implemented in the UK as part of the response to the Covid-19 pandemic”.[[48]](#footnote-48) Other contributing factors are broadly accepted to be the closure or reduced activity of frontline services that identify victims or offer opportunities for victim disclosures and the reduced visibility of exploitative situations during the lockdown. We must therefore conclude that the adequate collection and analysis of disaggregated data has been impeded by the pandemic.

1. **Please, share information about challenges faced in the provision of undisrupted healthcare, education and legal aid, as well as care recovery and reintegration services for the victims in the context of the outbreak.**

Children and young people who are victims or survivors of trafficking and modern slavery have been disproportionately affected by the government response to Covid-19 crisis. Both UK national child victims and child victims who are seeking asylum or who have irregular migration status have been impacted.

The Covid-19 crisis has exacerbated pre-existing crises in accessing service, particularity for children in care or those who are care leavers. Unaccompanied young people were already facing great challenges in access to support and care prior the pandemic. The uncertainty and serious risk to life brought about by the pandemic has meant their needs as young survivors of trafficking and exploitation has increased while the government’s response and support available to them from local statutory agencies has decreased. The following issues are impacting child victims’ access to healthcare, legal remedies, education and support to recover during the Covid-19 crisis.

***Re-traumatisation caused by isolation***The restrictions that have been imposed to control the Covid-19 pandemic have created a sudden withdrawal of much of the support they rely on for their physical and psychological health and wellbeing including schools and colleges, clubs, community centres and other social groups, and a significant reduction in access to counselling and other forms of therapeutic work or mental health services, as well as decreased access to social workers. ECPAT UK and other organisations working with survivors of child sexual exploitation and abuse have observed that the loss of tangible support and the consequential social isolation have ignited the re-living of the abuse. Many young people supported by ECPAT UK are reporting nightmares, flash backs and panic attacks. Some are struggling to control episodes of depression and suicidal ideation. Their need for mental health support and trauma care is increasing at a time when access to this support is diminished.[[49]](#footnote-49)

***Insecure accommodation*** Many young survivors are housed in unsuitable accommodation, particularly unaccompanied children over the age of 16 who have been exploited are already at a higher risk of going missing from care,[[50]](#footnote-50). Unaccompanied children a significantly at risk group including those who have been sexually exploited are six times more likely to live in unregulated semi-independent accommodation[[51]](#footnote-51), where there were pre-existing concerns around support levels prior to the pandemic.[[52]](#footnote-52) Evidence from ECPAT UK and other organisations providing direct support highlight cases of young people going missing from care.[[53]](#footnote-53) These missing episodes raise significant concerns regarding the on-going harms experienced by young people including sexual abuse and exploitation even when other forms of exploitation such as labour or criminal are the primary forms of abuse. ECPAT UK and other organisations supporting survivors have also observed increased risks of homelessness for survivors as statutory accommodation services and other accommodation providers refused entry to new referrals due to concerns around spreading the virus.[[54]](#footnote-54)

***Lack of access to Education***A number of young survivors ECPAT UK support aged 14–21, in full time education, have been unable to continue with school or college during a significant portion of the lockdown as they lack access to laptops, WiFi or support in liaising with schools. On the 19th of April the Government announced the provision of access to laptop and routers to children in care to support their on-going education[[55]](#footnote-55) but the disbursement of these essential items were limited and it is only as of the week of the 8th of June were most young people have now been able to access this scheme whilst some still remain without access.

***Legal Aid***

Separated children remained entitled to legal aid subject to the merit of their claims and their means (or ability to pay for legal advice) in immigration, asylum, public law and other community care issues. The pandemic has exacerbated the ability for a child to be identified as in need of legal advice and to be referred to a specialist solicitor who can provide this for the child. This is due to reduced and limited capacity by charities to identify these issues and refer as appropriate. For children who have been referred or who already had a legal representative prior to the commencement of the lockdown, have experienced significant challenges in instructing their lawyers remotely. Various legal advisers have reported to ECPAT UK the impact these sessions have had on children’s mental health as they relate to their lawyers the most painful and traumatic events of their abuse and are then left alone in the their accommodation following the end of the meeting. Due to this, various representatives have postponed interviewing children if in their best interest to do so, but many legal procedures still require meticulous statements even when there is no psychological support available to children following lengthy disclosure. This is particularly affecting child victims, who are housed in unregulated accommodation where in the absence of foster parents or support workers they are completely isolated and have no other form of immediate support.

1. Public Health England (2020) Disparities in the risk and outcomes of Covid-19 <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/890258/disparities_review.pdf> [↑](#footnote-ref-1)
2. Medact, Migrants Organise, New Economics Foundation (2020) Patients not Passports: Migrants’ Access to Healthcare During the Coronavirus Crisis <https://neweconomics.org/uploads/files/Patients-Not-Passports-Migrants-Access-to-Healthcare-During-the-Coronavirus-Crisis.pdf> [↑](#footnote-ref-2)
3. # Mark Townsend (2020) ‘Number of missing vulnerable children soars as safeguarding is cut during pandemic’, *The Guardian,* 6th June 2020<https://www.theguardian.com/society/2020/jun/06/alarming-rise-in-cases-of-missing-children-following-safeguarding-cuts>

   [↑](#footnote-ref-3)
4. ## Relief Web (2020) ‘COVID-19: Urgent need for child protection services to mitigate the risk of child sexual abuse and exploitation worldwide’, *Relief Web,* 6th May 2020 <https://reliefweb.int/report/world/covid-19-urgent-need-child-protection-services-mitigate-risk-child-sexual-abuse-and>

   [↑](#footnote-ref-4)
5. # Department for Education (2020) The Adoption and Children (Coronavirus) (Amendment) Regulations 2020 <http://www.legislation.gov.uk/uksi/2020/445/contents/made>

   [↑](#footnote-ref-5)
6. Article 39 (2020) List of signatories to the ‘Scrap Statutory Instrument 445’ campaign <https://article39.org.uk/scrapsi445/> [↑](#footnote-ref-6)
7. Department for Education (2020) Explanatory Memorandum (Supplementary) to the The Adoption and Children (Coronavirus) (Amendment) Regulations 2020 <http://www.legislation.gov.uk/uksi/2020/445/pdfs/uksiem_20200445_en_001.pdf> [↑](#footnote-ref-7)
8. House of Lords (2020) Secondary Legislation Scrutiny Committee, 13th Report of Session 2019-21 <https://committees.parliament.uk/publications/986/documents/7689/default/> [↑](#footnote-ref-8)
9. Article 39 (2020) ‘Safeguards for children in care – House of Commons’, 11th June 2020 <https://article39.org.uk/2020/06/11/safeguards-for-children-in-care-house-of-commons/> [↑](#footnote-ref-9)
10. Ibid. [↑](#footnote-ref-10)
11. Ibid. [↑](#footnote-ref-11)
12. Public Health England (2020) Disparities in the risk and outcomes of Covid-19 <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/890258/disparities_review.pdf> [↑](#footnote-ref-12)
13. Ibid. [↑](#footnote-ref-13)
14. Medact, Migrants Organise, New Economics Foundation (2020) Patients not Passports: Migrants’ Access to Healthcare During the Coronavirus Crisis <https://neweconomics.org/uploads/files/Patients-Not-Passports-Migrants-Access-to-Healthcare-During-the-Coronavirus-Crisis.pdf> [↑](#footnote-ref-14)
15. Ibid. [↑](#footnote-ref-15)
16. ECPAT UK (2020) Letter to the Children’s Commissioner for England, <https://www.ecpat.org.uk/news/letter-childrens-commissioner-investigate-failings> [↑](#footnote-ref-16)
17. ECPAT UK and Missing People (2018) Still in Harm’s Way <https://www.ecpat.org.uk/still-in-harms-way> [↑](#footnote-ref-17)
18. Article 39 (2020) ‘Care for all children in care’, 25th February 2020 <https://article39.org.uk/2020/02/> [↑](#footnote-ref-18)
19. Refugee & Migrant Children’s Consortium (2020) Young asylum seekers and unregulated accommodation  
    June 2020 <http://refugeechildrensconsortium.org.uk/young-asylum-seekers-and-unregulated-accommodation/> [↑](#footnote-ref-19)
20. Mark Townsend (2020) ‘Number of missing vulnerable children soars as safeguarding is cut during pandemic’, *The Guardian,* 6th June 2020<https://www.theguardian.com/society/2020/jun/06/alarming-rise-in-cases-of-missing-children-following-safeguarding-cuts> [↑](#footnote-ref-20)
21. # May Bulman (2020) ‘Sex trafficking victim with lung condition refused safe house accommodation during coronavirus lockdown, says lawyer’ in *The Independent,* 25th March 2020 <https://www.independent.co.uk/news/uk/home-news/coronavirus-lockdown-sex-trafficking-modern-slavery-victim-safe-house-home-office-salvation-army-a9424736.html>

    [↑](#footnote-ref-21)
22. Department for Education (2020) The Adoption and Children (Coronavirus) (Amendment) Regulations 2020 <http://www.legislation.gov.uk/uksi/2020/445/contents/made> [↑](#footnote-ref-22)
23. Public Health England (2020) Disparities in the risk and outcomes of Covid-19 <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/890258/disparities_review.pdf> [↑](#footnote-ref-23)
24. # Jamie Grierson and Amy Walker (2020) ‘Gangs still forcing children into 'county lines' drug trafficking’, in the *The Guardian,* 13th April 2020 <https://www.theguardian.com/uk-news/2020/apr/13/gangs-still-forcing-children-into-county-lines-drug-trafficking-police-covid-19-lockdown>

    [↑](#footnote-ref-24)
25. Jason Farrell (2020) Coronavirus: Drugs gangs dress children as key workers to evade police detection, in *Sky News,* 2nd June 2020 <https://news.sky.com/story/coronavirus-drugs-gangs-dress-children-as-key-workers-to-evade-police-detection-11999211> [↑](#footnote-ref-25)
26. National Youth Agency (2020) Gangs and Exploitation: A youth work response to COVID-19 <https://nya.org.uk/wp-content/uploads/2020/06/NYA-Hidden-in-Plain-Sight-1.pdf> [↑](#footnote-ref-26)
27. NSPCC (2020) ‘Lonely children are twice as likely to be groomed online’, 23rd April 2020 <https://www.nspcc.org.uk/about-us/news-opinion/2020/coronavirus-children-groomed-online/> [↑](#footnote-ref-27)
28. # Home Office (2020) ‘Hundreds of arrests and deal lines closed as police crackdown on county lines gangs’, th May 2020 <https://www.gov.uk/government/news/hundreds-of-arrests-and-deal-lines-closed-as-police-crackdown-on-county-lines-gangs>

    [↑](#footnote-ref-28)
29. ECPAT UK (2020) Letter to the Children’s Commissioner for England, <https://www.ecpat.org.uk/news/letter-childrens-commissioner-investigate-failings> [↑](#footnote-ref-29)
30. Focus on Labour Exploitation (2020) No Worker Left Behind: Protecting Vulnerable Workers from Exploitation During and After the COVID-19 Pandemic <https://www.labourexploitation.org/publications/no-worker-left-behind-protecting-vulnerable-workers-exploitation-during-and-after-covid> [↑](#footnote-ref-30)
31. Mark White (2020) ‘UK and France step up efforts to curb migrant Channel crossings’, in *Sky News,* 7th May 2020 <https://news.sky.com/story/uk-and-france-step-up-efforts-to-curb-migrant-channel-crossings-11984720> [↑](#footnote-ref-31)
32. # Mark Townsend (2020) ‘Patel refuses to take children from Greek camps threatened by Covid-19’, in *The Observer,* 13th April 2020 <https://www.theguardian.com/world/2020/apr/12/patel-refuses-to-take-children-from-greek-camps-threatened-by-covid-19>

    [↑](#footnote-ref-32)
33. Michael Drummond (2020) ‘Thousands of migrants on north coast of France at high-risk from coronavirus, warns charity’, in *The Independent,* 17th March 2020 <https://www.independent.co.uk/news/world/europe/coronavirus-calais-migrants-france-high-risk-channel-crossing-a9407101.html> [↑](#footnote-ref-33)
34. Home Office (2020) National Referral Mechanism Statistics UK, Quarter 1 2020 – January to March <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/889969/national-referral-mechanism-statistics-uk-quarter-1-2020-january-to-march.pdf> [↑](#footnote-ref-34)
35. # May Bulman (2020) ‘Coronavirus: Modern slavery referrals fall for first time in four years during pandemic, figures show’, in *The Independent,* 4th June 2020 <https://www.independent.co.uk/news/uk/home-news/modern-slavery-referrals-coronavirus-national-referral-mechanism-a9548781.html>

    [↑](#footnote-ref-35)
36. UN News (2020) ‘Online predators put millions of children at risk during COVID-19 pandemic lockdown’, 14th April 2020 <https://news.un.org/en/story/2020/04/1061742> [↑](#footnote-ref-36)
37. Europol (2020) Catching the virus: Cybercrime, disinformation and the Covid-19 pandemic <https://www.europol.europa.eu/publications-documents/catching-virus-cybercrime-disinformation-and-covid-19-pandemic> [↑](#footnote-ref-37)
38. NSPCC (2020) ‘Lonely children are twice as likely to be groomed online’, 23rd April 2020 <https://www.nspcc.org.uk/about-us/news-opinion/2020/coronavirus-children-groomed-online/> [↑](#footnote-ref-38)
39. Department for Culture, Media and Sport (2019) Online Harms White Paper <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/793360/Online_Harms_White_Paper.pdf> [↑](#footnote-ref-39)
40. Information Commissioner’s Office (2020) Age Appropriate Design Code <https://ico.org.uk/media/for-organisations/guide-to-data-protection/key-data-protection-themes/age-appropriate-design-a-code-of-practice-for-online-services-0-0.pdf> [↑](#footnote-ref-40)
41. UK Government (2017) Digital Economy Act 2017 <http://www.legislation.gov.uk/ukpga/2017/30/contents> [↑](#footnote-ref-41)
42. Jamie Grierson and Amy Walker (2020) ‘Gangs still forcing children into 'county lines' drug trafficking’, in the *The Guardian,* 13th April 2020 <https://www.theguardian.com/uk-news/2020/apr/13/gangs-still-forcing-children-into-county-lines-drug-trafficking-police-covid-19-lockdown> [↑](#footnote-ref-42)
43. # Mark Townsend (2020) ‘Patel refuses to take children from Greek camps threatened by Covid-19’, in *The Observer,* 13th April 2020 <https://www.theguardian.com/world/2020/apr/12/patel-refuses-to-take-children-from-greek-camps-threatened-by-covid-19>

    [↑](#footnote-ref-43)
44. Michael Drummond (2020) ‘Thousands of migrants on north coast of France at high-risk from coronavirus, warns charity’, in *The Independent,* 17th March 2020 <https://www.independent.co.uk/news/world/europe/coronavirus-calais-migrants-france-high-risk-channel-crossing-a9407101.html> [↑](#footnote-ref-44)
45. # UK Government (2020) Digital minister urges parents to follow new guidance to keep children safe online during lockdown 23rd April 2020 <https://www.gov.uk/government/news/digital-minister-urges-parents-to-follow-new-guidance-to-keep-children-safe-online-during-lockdown>

    [↑](#footnote-ref-45)
46. Information Commissioner’s Officer (2020) ‘Age Appropriate Design Code is laid before Parliament’, 11th June 2020 <https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2020/06/age-appropriate-design-code-is-laid-before-parliament/> [↑](#footnote-ref-46)
47. Home Office (2020) National Referral Mechanism Statistics UK, Quarter 1 2020 – January to March <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/889969/national-referral-mechanism-statistics-uk-quarter-1-2020-january-to-march.pdf> [↑](#footnote-ref-47)
48. # May Bulman (2020) ‘Coronavirus: Modern slavery referrals fall for first time in four years during pandemic, figures show’, in *The Independent,* 4th June 2020 <https://www.independent.co.uk/news/uk/home-news/modern-slavery-referrals-coronavirus-national-referral-mechanism-a9548781.html>

    [↑](#footnote-ref-48)
49. ECPAT UK (2020) Letter to the Children’s Commissioner for England, <https://www.ecpat.org.uk/news/letter-childrens-commissioner-investigate-failings> [↑](#footnote-ref-49)
50. ECPAT UK and Missing People (2018) Still in Harm’s Way <https://www.ecpat.org.uk/still-in-harms-way> [↑](#footnote-ref-50)
51. Article 39 (2020) ‘Care for all children in care’, 25th February 2020 <https://article39.org.uk/2020/02/> [↑](#footnote-ref-51)
52. Refugee & Migrant Children’s Consortium (2020) Young asylum seekers and unregulated accommodation  
    June 2020 <http://refugeechildrensconsortium.org.uk/young-asylum-seekers-and-unregulated-accommodation/> [↑](#footnote-ref-52)
53. Mark Townsend (2020) ‘Number of missing vulnerable children soars as safeguarding is cut during pandemic’, *The Guardian,* 6th June 2020<https://www.theguardian.com/society/2020/jun/06/alarming-rise-in-cases-of-missing-children-following-safeguarding-cuts> [↑](#footnote-ref-53)
54. # May Bulman (2020) ‘Sex trafficking victim with lung condition refused safe house accommodation during coronavirus lockdown, says lawyer’ in *The Independent,* 25th March 2020 <https://www.independent.co.uk/news/uk/home-news/coronavirus-lockdown-sex-trafficking-modern-slavery-victim-safe-house-home-office-salvation-army-a9424736.html>

    [↑](#footnote-ref-54)
55. <https://www.gov.uk/guidance/get-help-with-technology-for-remote-education-during-coronavirus-covid-19> [↑](#footnote-ref-55)