

IN THE COVID INQUIRY (MODULE 8)

WRITTEN SUBMISSIONS ON BEHALF OF CORAM FOR THE PRELIMINARY HEARING ON 11 JUNE 2025

Introduction

1. As the Inquiry knows, Coram is the UK's oldest children's charity, working as 'the Coram Group' of specialist organisations.
2. Coram remains grateful for the opportunity to contribute to the work of the Inquiry. Coram will provide what it hopes is a comprehensive response to the Rule 9 request it has received for this module by the deadline of 3 June 2025.

The progress of Module 8 to date

3. Coram has read with care the latest documentation from Counsel to the Inquiry. It is clear that there has been much industry, but that there remains a great deal of work still to be done.
4. Coram notes the outstanding disclosure which is anticipated by Counsel to the Inquiry and hopes that the pace at which the remaining Rule 9 statements etc., will be provided will be manageable for all Core Participants so that they have a realistic opportunity to prepare for the hearing starting in September 2025.
5. Coram awaits with interest the publication of the Children and Young People's Voice report and Every Story Matters report.

The scope of Module 8

6. Having read the Counsel to the Inquiry's update about scope, Coram is encouraged that decision making (particularly in relation to the closure of schools) will be scrutinised, as well as there being a rigorous focus on the impact of the pandemic.

7. Coram's work directly engages with the issues that arise in the context of child immigration.

The matters that Coram observed during the pandemic in respect of child refugees, asylum seekers and migration were significant. Therefore, the recent indication that the question of the impact of Covid-19 on child immigration is to be subsumed within other topics, and therefore unlikely to be separately explored at the hearings, is a matter of concern to Coram. The Coram Group considers that it is necessary to interrogate the government's response to the pandemic on child migration.

8. It is noted that paragraph 7 of the document outlining the provisional list of issues that the Inquiry intends to explore includes:

The impact of the pandemic on children and young people in contact with the immigration system.

A. Whether there was consideration of children in families who had no recourse to public funds.

9. At the same time, the Inquiry has highlighted that there is overlap between families in need with no recourse to public funds, and other families subject to socio-economic disadvantage, as well as an overlap between children in care and unaccompanied asylum seeking children. It

is said that the Inquiry has concluded that the issues in respect of unaccompanied minors will be subsumed into other topics that it has committed to focus upon.

10. Coram considers that it is unfortunate that, for what seem like political reasons, children and young people in the asylum and immigration system are often treated as migrants first, and children second. Coram contends that it would be a misstep for the the Inquiry to repeat this pattern.
11. The Home Office does not record or estimate the numbers of undocumented people in the UK, meaning there is no concrete data on the numbers of unaccompanied child migrants in the country. However, at least [one in every ten children](#) in care has an unresolved immigration or nationality issue, and though those in children's services are well-intentioned and solutions orientated, it remains the case that those children face different issues and challenges that are distinctive from others who are in care.
12. By way of example, children who have come to the UK to seek asylum are likely to have a history of significant physical and/or emotional and psychological trauma; have experienced bereavement; face a language barrier; have come from a different education system; have no established friends or family to rely upon within the UK; have little or no contact with their own families; have reason to fear for the safety of their families; and have been inculcated with cultural stigma in respect of seeking mental health support. Such children may also face a culture of disbelief in relation to fundamental aspects of their identity, such as their age or country of nationality.
13. The issues for such children are stark. If a child achieves their majority while awaiting decisions about their immigration status, they will not be able to rely upon receiving housing, welfare support, and ongoing local authority support in the same way as their peers who do not have immigration issues. Since the pandemic exacerbated pre-existing decision making backlogs within the Home Office, a greater number of children were left to become legal adults while waiting for a decision; in 2020 the average number of days that an unaccompanied child seeking asylum had to wait for a decision [peaked at 550](#). They

are, in short, fundamentally more vulnerable in numerous ways and those vulnerabilities were compounded during the pandemic.

14. Children in care with immigration issues who did not arrive as unaccompanied asylum seeking children (e.g. those that were born in the UK but who are not British citizens or were brought to the UK with family as children and have come into care for protection reasons) will also face these additional barriers upon turning 18. They are reliant upon their local authority to identify that they have an immigration issue, and to resolve it for them before they reach majority. This means that unlike their British peers, if this does not occur, they will find themselves unable to work, go to university, access welfare support – all of the necessary elements to build an independent life. These issues were exacerbated during the pandemic when the necessity first, to identify issues and second, to act to ameliorate those issues expeditiously was either delayed or in some cases totally overlooked by overstretched and overwhelmed local authorities.
15. During the pandemic, unaccompanied asylum-seeking children, including those aged under 16, were [disproportionately likely](#) to be placed in independent and semi-independent accommodation when compared to other children in care. This served to increase their isolation and erect additional barriers to them accessing support. Furthermore, independent accommodation for over 16s was widely unregulated, putting this cohort at a greater disadvantage.
16. Moreover, unaccompanied children were the only cohort of children who were [housed in hotels](#) during the pandemic (from 2021 to 2024). No other children in care were treated in this way. That meant that lone children as young as 12 were placed in hotels, in some cases for several months, further isolating them at a time when normal socialisation was not possible, putting them at increased risk of trafficking and exploitation (in addition to the impact upon their wellbeing and mental health). During the time when hotels were being used to house unaccompanied children, 440 children are recorded to have gone missing.

The Coram Group is concerned that the Inquiry's proposed refinement to Module 8's scope means this very serious matter will not be investigated.

17. A large number of unaccompanied asylum-seeking children were also age assessed as adults during the pandemic, and in consequence, were inappropriately accommodated as adults under the Home Office policy 'assessing age'. The number of age-disputed cases [rose significantly in 2021](#), and a large number of these children were wrongly assessed as adults, and, in consequence, placed at serious risk of exploitation, abuse and harm before being found to be children by local authorities. If this Inquiry does not take the time to shine a light on the experiences of these children now, the opportunity to learn valuable lessons in order to prevent children from suffering similar experiences in a future situation where the government is again working under pressure, will have passed by. Unfortunately, that would be entirely reflective of the marginalised and subordinate position in which they were placed during the pandemic itself.
18. Children in asylum-seeking families were also housed in hotels (known as 'contingency accommodation') during and after the pandemic. In September 2021, there were around [1,425 family groups](#) housed in contingency accommodation, which had risen to 1,808 by December 2021. Children in contingency accommodation were not usually supported to register for education or healthcare, in the expectation that they would be dispersed to longer term accommodation within 19 days. In reality they could be waiting far longer, in particular due to policies restricting the movement of people during the pandemic.
19. Both families and unaccompanied children in hotels faced additional challenges, including: a lack of Wi-Fi in some locations; lack of access to digital devices to enable them to engage in online education; no designated space to learn (where a whole family was living in one room); no space to play; and severe limitations on alternatives usually open to people (such

as libraries) due to their lack of a fixed address. Many of these children and young people had not been accepted into the care of any particular local authority, meaning they were denied access to the support that should have been provided.

20. In summary, the experience of asylum-seeking and immigration experienced children in care can be significantly different to those of British children in care, with little “overlap” in their experiences. The pandemic served to amplify and exacerbate the differences.

21. Similarly, children in families with no recourse to public funds face significant additional issues to other families subject to socio-economic disadvantage. ‘No recourse to public funds’ includes those both with visas with an ‘NRPF’ condition, and those with no visas (‘undocumented’ people). Families with undocumented adults are far less likely to approach local authorities for support under Section 17 of the Children Act 1989 - which places a duty on a local authority to provide services to children in need and their families - due to fear of coming to the attention of immigration authorities. As will be understood, undocumented individuals do not have the right to work, or to rent property, or to hold a bank account. As a result, members of families where this is an issue can end up in deeply unsafe and/ or abusive living situations. By way of example, a lack of immigration status can be used as a form of coercive control over families, preventing them from leaving their abuser or reporting unsafe housing.

22. A [joint report](#) by Project 17, together with the University of Wolverhampton, the Public Interest Law Centre, ASIRT and the Migrants' Rights Network, found that there was a lack of information available as to how people with NRPF could access support when the pandemic occurred: more than 40% of local authority websites had no information about NRPF at all. The researchers also found that people who had NRPF struggled to access shelter, food, and subsistence support during the pandemic, and the most reported difficulty was being refused support from the local authority because of issues relating to

their NRPF status.

Conclusion

23. Coram considers that there are questions to ask and that there are lessons to be learnt in relation to all of the additional difficulties faced by immigrant children, asylum seeking children and unaccompanied minors during the course of the pandemic. These are separate and distinct from the problems that arose from those experienced by children in the care system who were not confronted by these compounding issues. Coram considers that these matters require a separate and distinct analysis and should not be conflated with the issues facing children generally, or those faced by children in care in particular, during the pandemic.
24. It is Coram's contention that to fail to examine the problems which arose for migrant children at the time when Covid-19 took hold and informed government policy would be a missed opportunity and prevent appropriate and timely planning for when the next pandemic (or similar emergency) occurs.

Dated: 30 May 2025

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