

Witness Name: Patricia Durr

Statement No.: 001

Exhibits: **PAD/01 -**

**PAD/20**

Dated: 24<sup>th</sup> July 2025

## **UK COVID-19 INQUIRY**

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### **WITNESS STATEMENT OF PATRICIA DURR**

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I, Patricia Durr, Chief Executive Officer of ECPAT UK, registered address 34 Wharf Road, London N1 7GR, will say as follows: -

#### **PART A: Your organisation**

1. ECPAT UK is a leading UK children's rights charity working to ensure that children everywhere enjoy their rights to protection and to lives free from trafficking and exploitation. Established in 1994 the organisation was the first in the UK with this dedicated focus on tackling child exploitation.
2. We have a collaborative approach in the UK and internationally as part of the ECPAT International membership network of 142 civil society organisations working to end child exploitation in 115 countries. This enables us to see the bigger picture, spot trends and develop collaborative responses.
3. Our work is rights based, child-centred and trauma informed. It is guided by the meaningful and ethical participation of the young people we directly support. We have a unique focus on children's rights at the intersection of the full range of issues that impact child victims of trafficking, including displacement and immigration, trauma and abuse, criminalisation and alienation, care and protection.

This focus allows us to highlight the systemic issues that continue to leave children unprotected and at risk of exploitation

4. We have an integrated model of work that includes:
  - a. **Policy, Research and Campaigns** to improve legislation, policy and frontline practice, using evidence from our research, direct practice and training. We actively engage and collaborate on 15 civil society engagement groups including the Home Office Modern Slavery Engagement Forum (MSEF) Core Group, Home Office Asylum Stakeholder Engagement Group (SEG) children's subgroup, National Crime Agency International NGO Advisory Group to the CEOP Command, the Home Office Tackling Child Sexual Abuse 3rd Sector Stakeholder Group, the Refugee and Migrant Children's Consortium and the Anti-trafficking Monitoring Group. We advocate for the rights of children across the UK in all devolved nations.
  - b. **Frontline Support for Children and Young People** through participative, trauma informed, culturally sensitive and gender specific approaches. We provide a safe environment for peer support groups, mentoring, therapy, ESOL and practical support promoting healthy relationships, community, recovery and stable futures
  - c. **Specialist, practical training, information and capacity building** on child protection, safeguarding and child trafficking and exploitation for a wide range of professionals working with at-risk children. This builds the capacity of a wide range of frontline professionals to improve care and support for trafficked children. We train social workers, foster carers, police officers, health care and education professionals to identify child exploitation and to safeguard and support children and young people appropriately, both to prevent exploitation and trafficking, and better support child victims.
5. ECPAT UK is now the UK's only children's rights organisation that is dedicated to policy and campaigns specifically concerning the protection of children from child trafficking, and modern slavery in all its forms. It coordinates and publishes a wealth of research and policy papers on human trafficking. Since 2007, ECPAT UK has provided training to local authorities, police, health professionals, and other frontline practitioners on safeguarding child victims of trafficking. In 2006, ECPAT

UK received the UNICEF 60<sup>th</sup> anniversary award for the most outstanding contribution to children's rights, with special mention for our work on child trafficking. Since 2008 ECPAT UK has been undertaking direct work with child victims of trafficking. In 2010 the charity produced the first and still the only periodic overview of child trafficking in the UK – Child Trafficking in the UK: a Snapshot report.

6. The ECPAT UK Youth Programme is funded primarily to provide support to and to work alongside child victims of trafficking who have some connection to the Greater London region. The Programme offers a range of services focused around a combination of 1:1 support and gender specific therapeutic peer support groups for children and young people aged 15-25 – many of whom have arrived in the UK as unaccompanied children. The Programme involves one to one mentoring and advocacy support, therapy and counselling, as well as the provision of other activities such as access to arts, drama and other creative arts workshops, English as a second language ('ESOL') classes, wider therapeutic support, rights and entitlements workshops, healthy relationships and education workshops, trips, residential outings, and other seasonal events. Access to the Programme is via referrals usually by statutory or voluntary sector agencies, predominantly Local Authority Children's Services and over the past two years we have seen an increase in self-referrals for those who are age disputed and living in hotels.
7. Integral to all our work is the ECPAT UK Youth Advisory Group which involves 12 young people at one time who meet monthly to contribute to the strategic direction of the charity and to undertake projects and campaigns.
8. Like most charities, we struggled with income and staffing during the pandemic and placed two members on the Covid-19 furlough scheme. In response to the pandemic, our work developed in a number of significant and long-lasting ways:
  - a. We moved our weekly peer support groups – one for girls and young women and one for boys and young men – online and we supported young people to adapt to the new format and platforms quickly.
  - b. We developed our 1:1 support creating individual support plans for each young person and providing daily check in phone calls and referring them

to expert professionals for specific needs such as accommodation or legal support. It moved our work from being groupwork focused to the development of more 1:1 support as young people experienced feelings of isolation and were unable to access support and services to meet even basic needs.

- c. We developed a Hardship Fund to respond to increased need for basic items such as food and clothes and in some cases, bedding as well as phones and computers and data.
- d. We increased our health and wellbeing focus because of the lockdown as many youth group members were worried about their health, feeling triggered by being physically confined and feeling overwhelmed by the many different stories going around about the virus.
- e. We helped the young people navigate the crisis by creating accessible guidance on trustworthy news and sources of information, and delivered life skills workshops on budgeting and protecting yourself from online fraud – key issues identified by the young people as risks in the newness and uncertainty of the lockdown.

## **PART B: Overview of child trafficking**

- 9. Child trafficking is child abuse and a human rights violation which must be treated as such within a child protection context. The UK Government is obligated under a range of international human rights instruments to uphold the rights of children and to take action to combat child trafficking and exploitation. Children who are victims of trafficking have a right to specific assistance, support and protective measures in line with international standards. In the UK, local authorities have a duty to promote and safeguard the welfare of children in need in their area under the child protection frameworks
- 10. The United Nations (UN) Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children – known as the Palermo Protocol - provides the foundational international legal definition of human trafficking. Child trafficking is defined in Palermo Protocol as the “recruitment, transportation, transfer, harbouring or receipt” of a child under 18 years of age for the purpose of

exploitation. The definition recognises that a child cannot consent to their own exploitation, regardless of whether he or she seemingly agrees to any element or genuinely understands the situation. The definition of child trafficking differs from that of adults, which requires an additional element to be present – the ‘means’ of trafficking. Although the ‘means’ element is not required for the legal definition of child trafficking, it may still be a feature of the abuse. The ‘means’ element refers to the “threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person”.

11. The transportation of victims may occur anywhere: internally within the UK and/or across international borders. A child may solely be transported to the room next door with the intention to exploit them or in some cases, transportation may not occur at all, but they may have been recruited and/or harboured. The exploitation faced may be for domestic servitude, labour exploitation, sexual exploitation, criminal exploitation, organ harvesting, slavery and slavery-like practices.
12. Although the UK’s anti-trafficking laws all derive from international standards (like the Palermo Protocol and the Council of Europe Convention on Action Against Trafficking), there are significant gaps and divergences which mean that our domestic legislation and statutory guidance determining the identification of victims is not compliant with international law. Notably, the ‘means’ element (coercion, force, deception, etc.) is explicitly not required to prove child trafficking, yet as our recent research found PAD/01 - INQ000651984 there is confusion in statutory definitions across all four nations contrary to international and domestic law. Significantly, the Modern Slavery Act 2015, has given a much narrower interpretation with a greater emphasis on the elements of movement and travel than the international definition, impacting in the identification of potential victims.
13. The UK government signed Council of Europe Convention on Action Against Trafficking in Human Beings (ECAT) on 23 March 2007. It was ratified on 17 December 2008 and came into force on 1 April 2009. This prompted the creation of the National Referral Mechanism (NRM), a victim identification and support

process which is intended (inter alia) to help the UK meet its obligations under ECAT. The NRM was introduced by way of non-statutory guidance, rather than through legislation. The system is now set out in the SSHD's statutory guidance document: *Modern Slavery: statutory guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and non-statutory guidance for Scotland and Northern Ireland Version 4.0*.

14. There is no one data source that accurately quantifies the number of child victims in the UK. The NRM official annual statistics provide figures for those referred as potential victims of modern slavery by First Responders. A referral does not require a child's consent, though it is best practice to inform them that a referral will be made and the implications of this. By contrast, an adult must consent to a referral. If adult consent is withheld, First Responders must nonetheless notify the Home Office without identifying the potential victim. This is referred to as the duty to notify. Yet, these figures refer only to those identified by frontline professionals as potential victims. Additionally, there is little join up between NRM data and data collected by local authority social care services who are responsible for child protection and care.
15. Poor data collation and sharing hinder understanding of the problem of child trafficking and responses to it. Research such as our joint report with the Independent Anti-Slavery Commissioner PAD/02 - INQ000651985 highlights inconsistencies in local data collection and reporting, pointing to significant gaps in the UK's child protection response.
16. For example, the Department for Education (DfE) recording of exploitation, particularly sexual and criminal exploitation, is contained within the children in need census (CIN) (the annual statutory census that collects data on children who are referred to local authority social care services in England). A child begins an "episode of need" when they are referred to children's social care services. Local authorities then undertake an assessment of the child's needs to determine which services to provide. The data routinely shows a disconnect between local assessments and NRM data. Factors identified at the end of assessment are

additional factors that social workers record as being relevant in a case, with one episode of need potentially having more than one factor recorded.

17. To further illustrate this point, in 2023, the instances of trafficking recorded as a factor by local authorities in their data returns to the Department for Education (2023) is the low figure of 2,710. Yet a factor of child sexual exploitation was recorded 15,020 times, child criminal exploitation (included as a category for the first time in 2022) 14,420 times, and the category gangs was a factor identified for 11,110 assessments.
18. While the NRM was established in 2009, disaggregated data prior to 2014 is not publicly available, and major changes to data recording practices occurred in late 2019. October 2019 marked a shift from recording a single “primary” exploitation type to capturing multiple types of exploitation per individual, with a separation between labour and criminal exploitation. Additionally, the category of “unknown exploitation” was replaced by a free-text field, later grouped as “not specified or unknown.” Nationality recording also changed, moving from a single-nationality model to one that allows for dual nationality, substantially increasing category granularity. These revisions significantly affect comparability over time.
19. NRM datasets on child referrals are disaggregated by year, age at the time of referral, age at the time of exploitation, exploitation type, nationality, outcome, and referring agency. Current data of potential child victims of modern slavery referred into the NRM does not report on the ethnicity of children
20. In 2017, 2,118 referrals were made for those potentially exploited as children constituting nearly half (41%) of all referrals into the National Referral Mechanism (NRM) that year. This was a 66% rise in the number of referrals for children identified as potential victims during 2017. Children identified as potential victims in 2017, came from a range of countries with the majority from the UK, followed by Vietnam, Albania, Sudan, Eritrea.
21. In 2018, 3,137 children were identified as potential trafficking victims in the UK, constituting a 48% increase on the number identified in 2017 and 45% of the total number of all potential victims identified. Children identified as potential victims in 2018 came from a range of countries with the majority from the UK, followed by

Vietnam, Albania, Sudan and Eritrea. In 2018, the number of boys identified continued to be significantly higher than girls; with male victims representing 72% of those identified, compared to 28% of female victims.

22. In 2019, a total of 4,550 children were identified by UK authorities as potential victims of trafficking in 2018 and nearly half of all victims identified were children – in line with findings from the previous year. The vast majority of child victims were from the UK, however significant numbers of children from Vietnam, Eritrea, Albania and Sudan were identified as potential victims in 2019. In 2019, 76% of all children identified as potential victims were boys, although it is likely that this reflects the increasing recognition of male victims of child criminal exploitation. Importantly, from October – December 2019, labour exploitation and criminal exploitation were recorded as separate exploitation types, having previously been grouped together.

23. Children of any nationality can be trafficked into the UK, en route to the UK and within the UK and the identification of child victims can happen at any point. NRM statistics reflect the number of children identified as potential victims of modern slavery in the UK, but do not reflect the true scale of the phenomenon. Given the hidden nature of modern slavery, reaching an accurate estimation of prevalence is challenging and there are no reliable estimates of how many children in total are victims of trafficking and exploitation. We do know that identification levels are low, confounded by a return to the conflation of modern slavery and immigration matters in government policy brought about by hostile environment policies and recent changes in legislation and guidance including the Nationality and Borders Act 2022 and the Illegal Migration Act 2023.

24. When an agency comes into contact with a child who may have been exploited or trafficked, Local Authority Children's Services and the police should be notified immediately and the matter should be investigated as a child protection concern. Referrals to the NRM should be made for all potential child victims of trafficking and modern slavery, who can be of any nationality, including British national children. A referral into the NRM does not replace or supersede established child protection processes, which should continue in tandem, such as a Section 47



investigation. All children, irrespective of their immigration status, are entitled to safeguarding and protection under the law. Additionally, section 17 of the Children Act 1989 imposes a duty upon every local authority to safeguard and promote the welfare of children within their area who are “in need”. In practice, local authorities perform a “child in need assessment” to determine the nature of support required to promote the welfare of a child in need..

25. Authorised first responder organisations for the NRM include local authorities, specified non-governmental organisations (NGOs), police forces and specified government agencies. These agencies have a statutory duty under Section 52 of the Modern Slavery Act to notify the Secretary of State when they identify a potential victim of modern slavery and in the context of children must therefore make referrals into the NRM using the digital referral platform
26. Where there is reason to believe a victim could be a child, the individual must be given the benefit of doubt and treated as a child until an assessment is carried out. Age assessments must only be carried out where there is significant reason to doubt that the person is a child and should not be a routine part of a local authority’s assessment of an unaccompanied or trafficked child.
27. For children who are referred into the NRM, the local authority will retain the duty to safeguard them, as child trafficking is child abuse and therefore requires a safeguarding response and in Scotland, Northern Ireland, Wales and two thirds of local authority areas in England, children will have access to the Independent Child Trafficking Guardianship service.
28. Once a potential child victim of modern slavery (age at point of referral) has been referred into the NRM, the Single Competent Authority (SCA) within the Home Office will make two decisions. First, within a target of five working days, the SCA will make a Reasonable Grounds (RG) decision based on the threshold ‘reasonable grounds the person is a victim’. If a positive RG decision is made, the SCA will go on to make a Conclusive Grounds (CG) decision, determining whether ‘it is more likely than not’ that the person is a victim of modern slavery. In the interim, the potential victim will benefit from a period of “recovery and reflection”,

during which risk assessments are undertaken and they are eligible for support such as accommodation and a support worker. For children, this is not provided by the Modern Slavery Victim Care Contract (MSVCC) delivered by the Salvation Army but by local authorities' children's services under local multi-agency safeguarding arrangements and in accordance with the applicable statutory guidance ('Working Together to Safeguard Children' and 'Care for Unaccompanied Children and Child Victims of Modern Slavery').

29. The implementation of the Nationality and Borders Act 2022 Act has increased negative RG decisions for children, from 10% negative decisions issued in 2022 to 26% in 2023. Cases where exploitation occurred in whole or in part overseas were particularly impacted by stricter evidentiary requirements. The Act disqualifies individuals from protection if they have served custodial sentences of more than a year or have been prosecuted for certain offences. This is particularly problematic for child victims of criminal exploitation, used for drug trafficking or other criminal activities.
30. More broadly in relation to child victims of trafficking for all types of exploitation, there are concerns about the quality of NRM decisions; the timeliness of decisions and the potential impact of delays on safeguarding actions; a disconnect between the NRM and local safeguarding processes; continued examples of agencies working in silo; and gaps in knowledge among professionals about the NRM and what it means for children.
31. Child victims of human trafficking face significant challenges as they transition to adulthood. Data obtained by the Anti-Trafficking Monitoring Group PAD/03 - INQ000651986 found that in 2022, 70% of children in the NRM either withdrew or had their cases suspended, making them ineligible for support. Only 13% of those who remained were referred for support under the MSVCC, and just 6% went on to receive it. Additionally, the process for obtaining informed consent from children is fraught with issues. Many children turning 18 do not receive enough information or support to understand the implications of remaining in the NRM. Poor communication between professionals and the Home Office also results in delays and errors, further impacting young people's ability to access essential services.

32. There is no publicly available data that brings together the nationality, immigration status and immigration outcomes for child victims. What we know through the NRM is the location of exploitation – and the nationality of the victim. Potential victims may report that their exploitation has occurred either in the UK, overseas, or a combination of both.
33. The referring agency gives an indication of when and where child victims who are trafficked into the UK might be identified or not. Data obtained for our recent report ***More than Words: how definitions impact on the UK's response to child trafficking and exploitation*** PAD/01 - INQ000651984 shows that in 2024, local authorities submitted the highest number of child referrals to the NRM (3,699), with 13% of negative decisions (490 cases) made on the basis that the case did not meet the definition at the RG or CG stage combined. Police first responders submitted 1,380 child referrals in that year, with 9% of negative decisions (124 cases) made on the definitional basis. The highest refusal rate on the basis of not meeting the definition was from government agency first responders (National Crime Agency, UK Visas and Immigration, Immigration Enforcement, and Border Force) with 868 child referrals made, and 26% of these received negative decisions (229 cases).
34. In relation to training for local authorities specifically, there are only a limited number which provide specific child trafficking training to social workers and other staff members who may come into contact with child victims. A brief internal scoping study done by ECPAT UK revealed that between 2017 to 2018 only 34% of London Boroughs provided any child trafficking course (including half day courses). Lack of funding to children's services has significantly limited these opportunities still further. For example, between 2015 and 2018 the number of local authorities to whom ECPAT UK was contracted to provide child trafficking training reduced from eight to just one; the gap was temporarily filled by obtaining a charitable grant to provide this training for free for a year. Currently there is an e-learning course on child trafficking developed by the Home Office which local authorities can access, but we do not have the data on the number of people trained nor can we determine whether this gap has been filled. Anecdotal

experience from ECPAT UK suggests this situation remains the same as set out in our previous reports.

35. This data shows that there are significant problems with identifying child victims at the point of entry to the UK. It is also impacted by provisions within the Nationality and Borders Act 2022 that have increased the risk of child exploitation, trafficking, and criminalisation. The Act allowed the Government to alter, via statutory guidance, the evidentiary threshold for RG decisions, previously set lower to assist victims in acknowledging the complexity of identification, particularly for children as a result of trauma.

36. The *More than Words* report PAD/01 - INQ000651984 highlights concerning disparities in how trafficking definitions are applied to children of different nationalities. Definitional refusals (as opposed to refusals based on credibility or not having enough information) show significant inequities by nationality, with British national children having far lower rates of refusals than some non-British national children, raising concerns about bias or inconsistent application of criteria. Disaggregated NRM data from 2024 shows significant disparity by nationality in definition-based negative decisions for both reasonable and conclusive grounds decisions for child referrals. The refusal rate on the basis of definitions was 7% for UK national children. A significantly higher rate was recorded for children of other nationalities: Iranian (59%), Afghan (43%), Sudanese (35%), Albanian (30%), and Eritrean (25%). For Vietnamese referrals, 12% of negative decisions were definition-based, while Romanian referrals refusals remained low at 5%

37. A significant risk for all child victims is a risk of prosecution for offences committed as a result of their exploitation, given this form of exploitation centres on a wide range of criminality, they will be at the highest risk of criminalisation when not identified as victims.

38. Whilst there has been some improvement in recent years, an inspection of policing responses to modern slavery and human trafficking from 2017 PAD/04 - INQ000651987 identified that there had been inconsistent and ineffective identification of victims, resulting in a failure to prevent the criminalisation of victims of trafficking. It found

a limited use of preventative powers and low numbers of referrals of potential victims into the NRM.

39. In the Independent Anti-Slavery Commissioner Annual Report 2020-2021 PAD/05 - INQ000651988 it was reported that the failure to consider the possibility of criminal exploitation from the outset of an investigation risks victims being wrongly prosecuted. Even when victims are correctly identified, that identification is not leading to effective protection from harm posed by the traffickers through effective safeguarding measures.

### **PART C: Pre-pandemic concerns about children**

40. Under the NRM (and the Council of Europe Convention on Action Against Trafficking in Human Beings on which it is based), if a person receives a positive RG, they are entitled to a “recovery and reflection” period. In the case of adult victims, this support is provided through a contract between the Home Office and the Salvation Army under the Modern Slavery Victim Care Contract. During the recovery and reflection period, the Salvation Army conducts risk assessments and provides support to adult victims to protect them from further harm and provide support to facilitate their recovery. For example, this may include a support worker and counselling. In contrast, here is also no centralised funding to meet the trafficking related needs of child victims beyond the Independent Child Trafficking Guardianship Service (ICTG) which is available in only two thirds of local authorities in England and Wales and only supports children without parental responsibility on a one to one basis (some exceptional cases may be supported).
41. The *ICTG Service Interim Statutory Guidance* was amended on the 3<sup>rd</sup> of April 2024 to reflects the current service being delivered from changes which occurred during the Covid 19 pandemic which included revisions made to the service model in 2024/25 to deliver a needs-based hybrid service for children receiving direct support by providing a combination of face-to-face and remote sessions based on a child’s vulnerability factors. The Home Office responded to queries regarding this change to explain this was made as a result of ‘the need to balance financial commitments’.

42. ECPAT UK is a founding member of The Anti-Trafficking Monitoring Group (ATMG) which was established in 2009, to monitor the UK's implementation of the Council of Europe Convention on Action against Trafficking in Human Beings (and latterly the European Directive on Trafficking 2011/36/EU). Since its inception, the group has had critical concerns in the way that the National Referral Mechanism (NRM) identifies child victims of trafficking (those under 18)
43. In 2010, after the NRM's first year of operation, the ATMG criticised the lack of sufficient expertise in relation to children of those tasked with identifying child victims in a report (Exhibit PAD17 - **INQ000652178**). Further, the decision to 'bypass' the existing strong and mature child protection system and locate the children's NRM outside of this system, the report argued, had a detrimental effect on trafficked children. It also asserted that children were not mini-adults and putting children and young people through such a system was inappropriate.
44. Since then, the ATMG has produced research examining the NRM in practice for children and has found evidence of poor decision-making, a worrying lack of child-specific knowledge and child safeguarding, an inappropriate focus on immigration, low awareness of the NRM, a lack of training and a lack of a formal recovery and reflection period for children. In 2014 the Home Office's decision to review the NRM, was very welcome and the ATMG produced a best practice model NRM for children **PAD/06 - INQ000651989** that ensures the key principles of an effective model of identification for child victims of trafficking are met and highlights many of the problems inherent within it for children including:
- A child-rights centred approach that puts children's best interests at its heart
  - A non-discriminatory model that is purely about the effective identification of trafficked children not conflated with the consideration of the child's nationality or immigration status
  - The use and development of existing child protection structures that recognise child trafficking as child abuse and the provision of an individualised, appropriate safeguarding response
  - The recognition that a child cannot give informed consent

- A fair and trust-based model that incorporates the views and experiences of the child and does not base decisions on the perceived credibility of the child's account alone
- A model involving skilled and experienced child protection professionals, working together in a multi-agency setting with other statutory agencies, civil society and other relevant organisations
- A localised model that empowers professionals and drives up awareness and understanding of trafficking and feeds into a centralised intelligence picture to prevent and combat the trafficking of children

45. In 2020, ECPAT UK and the Office of the Independent Anti-Slavery Commissioner produced a review PAD/07 - INQ000651990 into models of multi-agency decision making in the UK. *A review of what works in multi-agency decision making and the implications for child victims of trafficking* makes recommendations for best practice in multi-agency decision making for child victims of trafficking, including potential future devolved decision-making in the NRM. Following this report, the Home Office launched a pilot to transfer NRM decision making from central government to the local level by safeguarding partners. The pilot launched in June 2021 with the accompanying updated statutory guidance on how to identify and support victims, involving ten sites and was further expanded to ten additional sites in April 2023. An evaluation report covering the first year of the pilot, from June 2021 until June 2022 was delayed to May 2024 but showed the benefit of localised decision making, particularly with reference to timely decision making and links to safeguarding.

46. A particular problem for this group of children documented by ECPAT UK since 2016 is the risk of missing and re-trafficking. In ECPAT UK's experience, local authorities often fail to formulate sufficiently careful plans (or fail to plan at all) to protect child victims, with appropriate steps to reduce the risk of exploited children returning to their traffickers/exploiters.

47. This failure is reflected in the high incidence of child victims going missing from local authority care. ECPAT UK and Missing People have published three reports since 2016 PAD/08 - INQ000651991, PAD/09 - INQ000651992, PAD/10 - INQ000651992 with the latest in

2022 finding that one in three child victims went missing from local authority care in 2020. This is a rise of 25% from when ECPAT UK previously conducted the research in 2018.

48. Between 2017 and 2019, ECPAT UK completed a project with four local authorities, including an audit of cases with modern slavery and human trafficking indicators known as Partnership Against Child Trafficking ('PACT'). In 76 of the 120 cases, children and young people had gone missing with the number of episodes ranging from two to 65 instances within the previous twelve months. ECPAT UK identified that there is a specific need for safe and specialist accommodation for child victims of trafficking.

#### **PART D: Pre-lockdown concerns**

49. As concern and uncertainty about the spread coronavirus escalated at the end of February and early March 2020 and the UK Government started to issue advice about non-essential travel and contact we could see the devastating impact it was having on young victims of trafficking who were quickly losing access to essential services and social contact. Our main concerns in the immediate were:
- a. trafficked young people were experiencing new extremes of social isolation with essential frontline services for survivors struggling to remain operational as staff started to work from home
  - b. some young people at high risk of homelessness as specialist and other accommodation services close their doors to new arrivals due to fears of contracting Covid-19, leaving
  - c. travel restrictions and limitations on social contact having a detrimental impact on mental health and wellbeing for child victims of trafficking who were being triggered re-traumatised by memories of restriction of movement during situations of exploitation.
  - d. the situation would exacerbated existing inequalities in access to rights and entitlements for this vulnerable group of young people, who face structural barriers to support in the UK including immigration precarity, unequal access to healthcare, education and discrimination in support and care



50. We were also concerned that; as well as creating new risks for this group of children and young people to go missing from statutory care services and be re-trafficked including lack of contact with key support workers; confinement to a residence triggering 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, we were concerned that children spending more time online, would leave them exposed to risks of contact with criminals seeking to sexually, criminally or financially exploit them.
51. Both UK national child victims and foreign nationals child victims were impacted. We were concerned in particular, that those who were seeking asylum or have irregular migration status in the UK were 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 were completely reliant on their corporate parents and social workers for care and support.
52. Throughout the specified period, ECPAT UK regularly participated in stakeholder groups which advise the Home Office on policy and practice in the identification of and protection of child victims of trafficking, including the Home Office Modern Slavery Stakeholder Sub-Group on Child Trafficking, which we formerly chaired; the Home Office Core Modern Slavery Stakeholder Implementation Group; the Strategic Engagement Groups (SEG) Children's Subgroup and the Independent Expert Advisory Panel on Child Devolved NRM as well as the previous Independent Child Trafficking Guardians Advisory Panel. We were a key NGO participant in the review of the NRM commissioned by the Home Office in April 2014 . We also serve on the Home Office Statutory Guidance Reference Group; and the Scottish Government Strategy Group (Children), the Home Office Tackling Child Sexual Abuse 3rd Sector Stakeholder Group and the International NGO (INGO) Advisory Group to the CEOP Command, National Crime Agency.

53. Alongside nearly 40 human rights organisations, we sent an open letter to the Home Secretary calling for an end to policies such as healthcare charges and data sharing between the NHS and immigration enforcement, both of which prevent migrants from accessing the healthcare they need. It was our view that the UK response and lockdown measures differentially impacted social groups according to their class, race or ethnicity, immigration status, gender and ability and replicated and increased existing health inequalities in the UK. Individuals with intersecting disadvantages - particularly racial and ethnic minorities and those with insecure immigration status were disproportionately impacted by the virus. As this letter was not coordinated by us we do not have the original version of the letter, nor any response to it.
54. The government's 'hostile environment' policies including the NHS surcharge and data-sharing with immigration enforcement pre-dated the pandemic but 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. The young people we worked with were very frightened and confused and were struggling to get access to the most basic levels of healthcare and to understand the impact of the virus and the restrictions imposed on them.
55. We did not monitor the position in other countries which had gone into lockdown prior to the UK, in relation to the impact it had on victims of child trafficking. As a member of ECPAT International we were in touch via the Secretariat with other members and shared our experiences and concerns about the increased and different risks to children including:
- a. socio-economic factors such as decreased employment opportunities which put marginalised children at increased and particular risk
  - b. increased exploitation of children online during COVID-19 as offenders adjusted to restrictions
  - c. new risks when children and offenders are forced to stay at home, including grooming for all forms of child exploitation and live streaming of child sexual abuse

- d. reduced access to education, health and social care leading to increased isolation.

## **PART E: The impact of lockdowns**

56. The numbers of children identified in 2017-2019 are set out above and demonstrate a significant year on year increase. This is partly reflective of increasing awareness of child sexual exploitation and child criminal exploitation in particular.
57. The quarterly NRM figures for April to June 2020 when the UK was under strict social restrictions in response to the Covid-19 pandemic, highlighted the impact of the pandemic and government response on the most vulnerable children and young people – including victims of trafficking and others at high risk of further abuse and exploitation – when more children than adults were identified as potential victims for the first time ever.
58. The NRM statistics for the full year 2020 showed that 4,946 potential victims were exploited as children, an almost 10% increase on the previous year. Children also made up a larger proportion of all potential victims identified than in previous years, with 47% of all individuals identified saying they had been exploited as children. In line with previous years, the vast majority of children were from the UK, with 2,874 UK national children identified as potential victims. However, significant numbers of non-UK national children were also identified, with most coming from Vietnam (246 children), Sudan (163 children), Albania (160 children), Romania (138 children) and Eritrea (132 children). Children from Afghanistan, Iraq, Nigeria and Iran also made up significant numbers of those identified. In 2020 the numbers of potential victims identified decreased among children from Albania, Eritrea and Sudan compared with the numbers identified in 2019.
59. Criminal exploitation was the most prevalent exploitation type among children - with 2,544 children identified as potential victims. 93% of these children were boys. Across all exploitation types, 78% of children identified as potential victims were boys – again, an increase in the number of male victims compared to figures for

2019. Increased understanding of child criminal exploitation is likely to have been a significant driver of the higher number of UK national boys identified, as professionals and institutions began to recognise young males involved in drug supply and other criminal activity as victims rather than treating them as offenders.

60. In 2021 the statistics NRM showed that 5,468 potential victims were exploited as children, which was more than a 10% increase on the previous year (4,946). Across all exploitation types, 79% of children identified as potential victims were boys. In line with previous years, the vast majority of all child referrals to the NRM were of UK nationals accounting for 54% (2,981) of child referrals. The second most referred nationality for children was Vietnamese at 269 followed by Albanian children at 244.
61. The Covid-19 crisis 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 victims of trafficking. 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 meant their needs as increased while the government's response and support available to them from local statutory agencies decreased.
62. The UK Government introduced the Adoption and Children (Coronavirus) (Amendment) Regulation 2020 (SI/445/2020) in April 2020 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.
63. The legislation 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.

64. The significant dilution of important corporate parenting duties to visit and maintain contact with children resulted in child victims being further silenced and their needs being completely overlooked. The loss of support increased risks of destitution, harm, exploitation and deterioration in their mental health. We were particularly concerned about the following regulations brought in under the new legislation:

- a. Regulation 8(13) removed timeframes for social worker visits to looked after children. During the pandemic, trafficked children in care need more support than ever. Loss of regular visits and support put them at increased risk of exploitation and harm. Those with no family members in the UK rely on their social workers to do what any good parent would do.
- b. Regulation 8(14) removed timescales for statutory reviews of the welfare of children in care. Trafficked children often experience uncertainty about the future, particularly relating to whether they can remain in the UK. They need to know that there is a plan to increase the support and care around them and safeguard their wellbeing during this uncertain time.
- c. Regulation 8(14) removed timescales for statutory reviews of the welfare of children in care. Trafficked children often experience uncertainty about the future, particularly relating to whether they can remain in the UK. They need to know that there is a plan to increase the support and care around them and safeguard their wellbeing during this uncertain time.
- d. Regulation 8(11) removed safeguards for children in out-of-area foster placements with persons unconnected to them. Trafficked children may be placed in a new area to break links with traffickers. Loss of trust in the adults charged with their care can increase the risk of children going missing and being re-trafficked. Having systems and structures in place is critical to safeguard children from going missing from out-of-area placements.
- e. Regulation 5 removed timeframes relating to children being privately fostered. Local authorities proactively registering and visiting children being privately fostered plays a critical role in the identification and safeguarding of child victims of trafficking.

65. The Children (Private Arrangements for Fostering) Regulations 2005 were legislative changes brought about in response to the Victoria Climbié Inquiry recommendations for greater protection for privately fostered children and their importance in identifying trafficked and exploited children and young people. The key change was to mandate proactivity on the part of local authorities in registering and seeing children and is a critical part of the picture in identification of child victims of trafficking and exploitation so the move away from clear timescales for checks and regular visits were very concerning. These provisions form a significant protective measure without which children and young people were left more at risk of being exploited or abused within a domestic setting for a longer period of time and not being identified and protected.
66. The High Court considered a judicial review brought by the charity Article 39 against the Regulations in July 2020, finding that the DfE did not act unlawfully by introducing the changes. This was reversed on appeal, where the Court of Appeal determined in November 2020 “that the Secretary of State acted unlawfully by failing to consult the Children’s Commissioner and other bodies representing the rights of children in care before introducing the Amendment Regulations”. This decision related to the No.1 Regulations, which had expired in September 2020.
67. Following a consultation, six sets of regulations relating to medical reports in the adoption and foster care process, visits by social workers, Ofsted inspections and virtual visits remained amended until 31 March 2021.
68. The pandemic saw a significant proliferation in online exploitation of children. According to the UK’s National Crime Agency (NCA), an estimated 550,000 to 850,000 people in Britain pose a sexual risk to children, including online. The UK is the third largest global consumer of livestreamed child sexual abuse. As part of the Children’s Coalition on Internet Safety we raised concerns about this in relation to drafting of the Online Safety Bill at the time.

69. On 4 June 2020, ECPAT UK with three other frontline organisations wrote to the Commissioner because we were very concerned that the pandemic and responses to it led to a significant and sudden curtailment in important and hard fought for statutory safeguarding duties. We were concerned that the most vulnerable children and young people were alone and afraid and at greater risk and that the situation was undermining their recovery and exposing them to unnecessary and disproportionate risks of re-trafficking, exploitation, abuse and a deterioration in their emotional and mental well-being. The main concerns expressed in the letter

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were:

- a. **Failures to arrange access to education:** during the pandemic, looked after children and children with a social worker should have had access via the national scheme for devices and internet access through the local authority, schools and colleges. Young people we worked with were unable to continue with school or college work because they did not have access to laptops, WiFi or support in liaising with their schools and colleges. Children and young people with access to charity support like ours relied on it entirely to advocate for them, to source laptops and to liaise with their schools and colleges regarding delays in completion of course work to avoid termination of their enrolment. It was concerning that charities, already stretched in their funding and resources, should substitute for the central government scheme to which children and young people were eligible and entitled.
- b. **Failure to ensure young people's basic needs are met:** some young people, reliant on local authorities to provide financial support, were at increased risk of exploitation due to late payments. During the pandemic lockdown, with most institutions physically closed, and most adults to whom the young people would normally turn to working remotely and inaccessible in-person, young people who found themselves in this financial situation had far fewer options to turn to, exposing them to actual and real risk of significant danger and exploitation. We were very concerned that this increased the likelihood of children going missing. We were additionally

concerned about the specific needs of disabled young people and those with specific mental or physical health problems, including cognitive delay.

- c. **Failure to meet children and young people's needs for emotional, psychological and mental health support:** we appreciated that the nature of statutory visits and contact changed during Covid-19, but a vast number of the children and young people we supported reported no contact at all or greatly reduced contact with those tasked with supporting them during lockdown. It is hard to understand how local authorities assured themselves as corporate parents that the children and young people they were responsible for were safe and well at a critical time when these young people needed practical and emotional support the most. The situation was re-traumatising for some young people and left many unable to cope, particularly those with pre-existing mental health issues. In the London area, we were not aware of any local authorities arranging for young people to continue to access counselling or therapeutic services online that they were already receiving or offering counselling and mental health support to help them cope with the sudden loss of their normal support networks. In particular, we were aware of young people who suffered panic attacks such that they have required medical attention and of others who have felt suicidal, left dependent on volunteer telephone befrienders while in lockdown.
- d. **Failure to convey, explain and support children and young people in understanding public health guidelines:** there was a real need for more information in child friendly formats, in different languages and in a way that those with learning difficulties or poor literacy could access. Additionally, we were fully aware of the disproportionate impact of Covid-19 on black and minority ethnic people affecting most of the young people we were working with, without any information about why nor any mitigation of its impact. This meant heightened concern and fear of seeking medical care when they were symptomatic. We wanted a centralised strategic approach to ensure that looked after children and young people and care leavers and



others who are without kinship support were provided with accessible information.

- e. **Safeguarding and risk of going missing and re-trafficking:** children and young people were rendered more vulnerable to going missing and facing exploitation and abuse – they were alone, afraid, lacking in the resources to meet their basic needs and unable to access mental health support. These young people needed increased support and care around them to safeguard their wellbeing but instead The Adoption and Children (Coronavirus) (Amendment) Regulations 2020 meant even less support and increased risks to their safety and welfare. This curtailment of statutory duties had a disproportionate effect on this cohort of young people, with no family or other support networks to act as a safety net in the absence of social worker visits or telephone contact. In addition to this, the ICTG Service, in statute since 2015, yet to be rolled out across England and Wales, left the majority of child victims of trafficking without the independent support they were entitled to.
- f. **Increased demand and role of the charity sector:** Charities on the ground working closely with young people stepped in to meet children's and young people's urgent and basic need for food, human contact and emotional support, including mobile phone credit, laptops, WiFi and online counselling and befriending, as statutory services fell away. There was a significant failure of statutory duties to look after children. There are of course also many children who were not in contact with charities, particularly those living away from major cities, who had been falling through the gaps without these services

**70.** We were particularly concerned about those children living in semi-independent, especially unregulated accommodation, who already had such little support. In February 2020, the Department for Education launched a consultation on reforms to unregulated provision for children in care and care leavers. There were six times more unaccompanied asylum-seeking children living in semi-independent accommodation and grave concerns that unregulated accommodation places

children at greater risk of exploitation. We also set this out with the Refugee Children's Consortium in our response to the consultation (Exhibit PAD/19 - INQ000652181)

71. We received a response from the Commissioner who was sympathetic to our concerns and set out her own concerns PAD/12 - INQ000651995. We had a meeting with the Commissioner in September 2020, during which we urged that she use her powers to undertake an investigation.

72. The pandemic period also saw considerable delays in decisions within the NRM. These delays, both at the RG and CG stages, as well as in decisions on applications for Leave to Remain, have had a negative effect on the mental health of survivors. Extended uncertainty about their immigration status and protection entitlements has contributed to heightened anxiety and distress among some individuals.

73. It also coincided with an already heightened period of uncertainty regarding immigration status, particularly due to the Brexit transition period. This alongside delays in asylum and immigration decisions created additional challenges for children in situations of exploitation. For many non-British children in the UK, lockdowns were felt to exacerbate the sense of 'limbo' when waiting for the outcome of NRM conclusive grounds and immigration decisions. This situation was described by survivors as "immigration lockdown".

74. In addition, the pandemic contributed to significant delays and disruption within the justice system. A backlog in court processes emerged, and in some instances, referrals and proceedings were halted entirely. These delays left a number of children and young people in situations of uncertainty, with no clear indication of when their cases would progress. The absence of timely resolution has had a prolonged impact on their access to justice, support, and safeguarding measures.

75. With members of the Refugee and Migrant Children's Consortium, we wrote to the Children's Minister, Vicky Ford PAD/13 - INQ000651996 in the Department for Education. We have been engaged with the Department for Education and the Home Office

since the early stages of design of the National Transfer Scheme (NTS) under section 69 of the Immigration Act 2016, highlighting problems and delays of the scheme.

76. This was a problem widely acknowledged leading to numbers of transfers falling and local authorities identified difficulties with the current system. We supported the review of the NTS process and welcomed proposals in August 2020 to move the NTS to a 'rota' format, with the aim of reducing delays and making transfer more straightforward, in part by removing barriers to transfer and maintaining the overall principle of ensuring that the best interests of children remain a primary consideration.

77. The NTS is operated under a protocol which provides guidance on its operation, and which can be updated including the threshold for 'greater capacity' which is currently calculated on the basis of the number of unaccompanied children in care being less than 0.07% of the total looked after child population of each local authority.<sup>8</sup> Legislation was amended in 2018 to extend the scheme to include local authorities in Scotland, Wales, and Northern Ireland. Despite this increased rate, the Local Government Association and other local government representatives had stated their concerns about the funding, given the financial pressures councils were already under.

78. While every local authority has a duty to support unaccompanied children claiming asylum in the UK, at or above the agreed threshold of 0.07% of their child population, some local authorities declined to take enough (or any) children into their care. This led to highly vulnerable children being held at immigration facilities when they should be placed immediately in local authority care.

79. The Government had acknowledged the NTS needed reform. Whilst funding for local authorities caring for this cohort of children has been increased in recent years, concerns remain that inadequate funding for care leavers, and difficulties accessing specialist services such as legal advice, has contributed towards the reluctance of some local authorities to engage more readily in the scheme.

80. On top of that, the greatest single challenge facing children's services is sufficiency of homes or places to care for children, especially for the most vulnerable children. The Covid-19 pandemic reduced the number of suitable places even further. In order to support local authorities caring for unaccompanied children, they were entitled to receive a funding contribution at a rate of £143 per child per night for those transferred under the National Transfer Scheme (NTS). This scheme began operating in 2016 in accordance with the Immigration Act 2016 which provided for the transfer of responsibility for the care of unaccompanied children seeking asylum from the local authority where they arrive to the care of other local authorities with greater capacity on a voluntary basis.

81. We wrote at the start of January 2021 because reform had not been implemented. We highlighted the refusal of some local authorities to take vulnerable children into their care, and the failure of central government to find a solution. These were serious failures to care for unaccompanied children arriving in the UK, with a number of local authorities saying they were at capacity and unable to take any more children into their care.

82. The Minister responded to the CEO of the Refugee Council, setting out the concerns and the need for reform and offering a meeting. Meetings continued via the National Asylum Stakeholder Forum's sub-group on children.

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83. As a result of this situation, hotels were first used by the Secretary of State for the Home Department to accommodate newly arrived unaccompanied children in July 2021. Thousands of newly arrived unaccompanied children were subsequently accommodated in hotels. Figures from the Secretary of State for the Home Department state that between July 2021 and January 2023, more than 4,600 children were accommodated in hotels, on average for more than two weeks. During that same period, more than 400 children went missing, suspected to have been trafficked within the UK. Updated figures are not published as part of the SSHD's quarterly published immigration and asylum statistics. Following a question in the House of Lords by Lord Alton to the Home Office Minister, we understand there were 6,257 unaccompanied children accommodated in Home Office hotels between July 2021 to 31 January 2024, when the final hotel closed.

In the period where hotels were in use, there were 472 episodes where an unaccompanied child went missing which related to 464 different children. Out of the 464 children who went missing, there are 78 young people still missing (as of 3 February 2025).

84. We had raised concerns about the use of hotels for children since the practice started. Following a Freedom of Information Request issued by ECPAT UK, with the assistance of Article 39 and the Helen Bamber Foundation, we obtained data regarding the total number of unaccompanied children who had gone missing from Home Office hotels between 1st June 2021 until 31st March 2022 when unlawfully accommodated outside of the child welfare system. The findings were published in our report *Outside the Frame: Unaccompanied children denied care and protection* (Exhibit PAD18 - INQ000652179 ).

85. In November 2022, ECPAT UK initiated steps towards a legal challenge to the systematic derogation of child protection duties by Kent County Council and the use of hotels by the Home Office to house unaccompanied children in hotels outside the statutory child protection and education framework from August 2020 until March 2024. ECPAT UK assisted the Court over multiple hearings to supervise Kent and the Home Office to take the necessary action to close hotels and reinstate in full the entitlements of all unaccompanied children to statutory child care, education and social work protection.

## **PART F: ECPAT UK's interactions with the UK Government**

86. This statement sets out the issues we sought to raise with the UK Government during the pandemic in large part. Additionally we gave Written Evidence to the Education Select Committee Inquiry: the impact of COVID-19 on education and children's services PAD/15 - INQ000651998 which included the following summary of key points:

*"children's services were already under pressure before COVID-19. The pandemic has occurred at a time when they have little resilience to manage its impact;*

*the pandemic and the government response to it have 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; the pandemic has highlighted significant gaps in the support available to children at a time when their needs have increased; any recovery plan must enable children, young people and families to recover from the impact of the pandemic and include ring-fenced funding for local authorities, charities, and education settings, to allow them to expand and adapt their services and support of need; the Adoption and Children (Coronavirus) (Amendment) Regulations 2020 substantially weakened legal protections for children in care and were introduced without a clear or proper consultation and without parliamentary scrutiny.”*

**87.** Our engagement in the various stakeholder groups that we set out para 52 continued in large part, albeit all online, via Microsoft Teams. The most difficult aspect of our interactions was the backdrop of an increasing hostile policy environment which impacted on child victims of trafficking within the asylum and immigration systems specifically, but affected all child victims. The biggest problem was the way in which the move away from considering child trafficking and exploitation as a child protection matter and toward conflating immigration matters with modern slavery responses.

**88.** In March 2021, the Home Office published their ‘*New Plan for Immigration*’ which included a significant number of proposals to reform modern slavery legislation affecting survivors of child exploitation as well as wider measures relating to asylum policy which would also be detrimental to survivors who also apply for asylum, a procedure which was already very challenging for many child victims to navigate. The proposals were announced shortly after the release of the official NRM data showing more children than ever before were identified as potential victims of trafficking in 2020. Proposals on modern slavery should not have been

included in a plan for immigration reform at all, given victim identification is not an immigration matter but rather a child protection issue in the case of children.

89. The Plan included a commitment to making improvements for child victims but as the subsequent legislation and associated regulations and guidance emerged it was clear that the government was not listening.

## PART G: Lessons learned

90. The most effective steps that were taken during the pandemic were those that provided continuity of care, support and protection, that enabled children and young people to understand more about what was happening and why, that allayed their fears, that supported their families and networks and that responded well and flexibly to respond to changes in routine, need, risks and threats. Our experience as a small charity was that the most important thing children needed was connection and that the withdrawal of services and support was detrimental to them – what was needed was a flexible and responsive approach to their changing needs.

91. There are messages from young people contained in our *Snapshot report 2021* (Exhibit PAD16 - INQ000652177) that support this view:

- a. “NR found it hard through the pandemic to connect with people. He said, ‘Talking with people over Zoom calls is so different than talking face to face.’ He said one of the good things for him in the past year was participating in a conference because for him it meant he was ‘getting my voice heard and expressing myself.’ NR felt that ‘it helped with my confidence as I presented to more than 50 people.’ NR reflected further on the support he received as a looked after child and now a care leaver stating ‘Covid 19 made local authorities think about what they were providing. Before Covid 19 they only gave us £32.50 per week. It wasn’t enough to survive on. But with Covid 19 they increased the allowance for young people. It is now enough to live off.’”

- b. *"For [NR] the last year through the pandemic 'wasn't a great experience, but it gave me more time to do work on myself. I improved my spirituality.' He mentioned how he 'increased how much I prayed.' He found it very difficult to be 'separated from friends and family, however in some ways we got to know people together.' He reflected that 'studying online was a challenge - it was harder to get 1:1 support, you had to learn more independently, and this added to the language challenges.' He described the year as a 'rollercoaster', adding 'I had challenges, but I overcame these and got grades to go to university.' Reflecting further, [NR] said 'Covid 19 has increased my opportunities. Before taking part in things, I would need to travel to places - this costs money and takes time. Now I can join things online, so it has opened up opportunities.'*
- c. *[NR] was very positive about his year. He said 'I've had a great year so far, honestly. My first job, I got let go because of Covid 19. However, I ended up getting a better job.' Reflecting on the year he said 'there were things that I always wanted to do, but I was too busy. In Covid 19 times, I actually got time to do it. It's been a blessed year for me.'"*

**92.** It is well documented that children's services were already under pressure before Covid-19, and that the pandemic and responses to it exacerbated the difficulties considerably. Investment in children's and young people's services, including universal services as well as a commitment to protect children in need of specialist support to protect them and help them to heal, and to prevent trafficking, exploitation and abuse was needed.

**93.** ECPAT UK was a signatory along with more than 150 other organisations to the call to put children and young people at the heart of the Covid-19 recovery – an ambition that was not realised in terms of the paucity of investment in the recovery planning and the lack of commitment to reinstate the scale of long term investment needed.

**94.** For child victims of trafficking in particular the need for more protection and care needs to be considered as we know that offenders adapt easily to situations that increase isolation of victims. Children should have access to specialist advice and



support to address their experiences of exploitation and these need to increase during any future pandemic or national emergency, not decrease as we know that the risks to children increase and offenders . The care and support given to children must be tailored to their specific needs and vulnerabilities as victims of trafficking including specialist mental health services, and this should be evidenced throughout all care and pathway planning – including their immigration status.

95. The roll out of independent guardianship for all child victims would ensure much needed advocacy in the case of any further pandemic. . The Independent Child Trafficking Guardianship service should be placed on a statutory footing and rolled out across all local authorities in England and Wales. Extending it across the UK for all unaccompanied children would address the fact that they are at increased risk of going missing and of trafficking and exploitation. Guardians can advocate for their needs and provide tailored support to promote recovery and to safeguard them from further harm.

### Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief of its truth.

**Personal Data**

Signed: \_\_\_\_\_

Dated: 19<sup>th</sup> August 2025

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