COVID-19 INQUIRY – MODULE 8

WITNESS STATEMENT OF CHRIS QUINN

I. INTRODUCTION

1. I, Chris Quinn, Northern Ireland Commissioner for Children and young people from 2023 to present day, whose office is Equality House, 7-9 Shaftsbury Square, Belfast BT2 7DP, Northern Ireland, make this witness statement pursuant to the Request for Evidence under Rule 9 of the Inquiry Rules 2006. This is to be read with the statement from my immediate predecessor the former Northern Ireland Commissioner for Children and Young People, Koulla Yiasouma [exhibit CQ/01 - INQ000588091]. Her statement deals with the role she and the Office of the Northern Ireland Commissioner for Children and Young People ("NICCY") played during the Specified Period of 1st January 2020 to 28th June 2022. It primarily addresses involvement in and the impact of the government's pre-pandemic planning, its subsequent pandemic response and the decisions taken in relation to education, social care and the protection of children and young people.

2. I took up my appointment as Commissioner on 18th September 2023. My term of office ends in September 2027 and I will be eligible for re-appointment for a further term of four years. Whilst I became Commissioner after the Specified Period, I am acutely aware of the ongoing impact that the Covid-19 pandemic had, and continues to have, on the children and young people of Northern Ireland. Accordingly, this statement will focus on the impacts of the pandemic on specific groups of children in Northern Ireland and any reference to a Department or a Minister is a reference to the Northern Ireland Department and the Northern Ireland Minister. I welcome the opportunity to assist the Inquiry with its examination of the issues being covered by Module 8, which include an examination of the impact of the pandemic on children and young people throughout the UK and its impact on children with health needs,

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special education needs and/or with disabilities and children from a diverse range of ethnic and socio-economic backgrounds.

3. This statement in conjunction with the statement of Koulla Yiasouma, and together with the exhibited documents, constitutes my response to the matters to be addressed as set out at Annex A of the Rule 9 Request. Koulla Yiasouma also provided a statement and documents pursuant to a Rule 9 Request for Module 2C. However, I have not assumed that the Inquiry team working on Module 8 has seen or considered that statement or its associated documents, so some of that material has been included in my response insofar as it is relevant. I am happy to provide a further statement should the Inquiry require additional information including in relation to any matter not so far addressed.

II.   IMPACTS OF THE PANDEMIC ON SPECIFIC GROUPS OF CHILDREN AND YOUNG PEOPLE

a. The impact on the educational attainment of children and young people

4. Much has been written about the potential long-lasting societal and economic effects of school closures. The UN Committee on the Rights of the Child warned as early as 8th April 2020 that the potential losses that may accrue in learning for children and young people, and for their development, are hard to fathom. It is difficult to fully determine the extent of the impact the pandemic has had and continues to have on the educational attainment of children; however, it is my belief it has had a negative impact.

5. As we know, remote learning was thrust upon the education sector in March 2020 with little or no planning or preparation. Evidence suggests that inconsistency in pupil engagement with remote learning was a major factor in the impact on education during the pandemic. The cancelation of exams and use of centre predicted grades for exam year students means that we will never know the grades they would have been able to achieve had they had access to uninterrupted classroom-based teaching. Young people had no say in the decisions being made about and for them, as with the cancellation of exams and predicted grades. This lack of the voice of the child was repeated across different aspects of children's lives but was most prevalent in education. As high as 80 percent of respondents to a Northern Ireland Youth Forum survey conducted in May 2020 felt decision makers were not listening to them [exhibit

CQ/2 - INQ000648135]. They called for policymakers to actively involve young people in discussions and decisions as key stakeholders.

6.   One of the difficulties in stating the extent the pandemic impacted upon educational attainment is that NICCY have not carried out any work in assessing whether school leavers did not progress to third level education or further training specifically due to the pandemic. We have recently begun conducting research on the growing problem of children missing education following concerns at the increasing number of children and young people who are not in school at all. The research is in the early stages with publication due in Autumn 2026. It will explore the experiences and needs of children and young people who are missing out on their education. The results of this study will speak to the impact such avoidance is having on educational attainment, however even before the results are known, I can state my firm belief that school avoidance and school-based anxiety damages attainment levels. The pandemic is undoubtedly a huge factor in why growing numbers of children and young people avoid school and therefore provides a direct link between the impact of the pandemic and educational attainment.

7.   The shift to remote learning led to concerns about academic progress and future prospects. Many children and young people felt that the quality of education received during the pandemic declined and that they lacked adequate support. They called for enhanced support for remote learning and the provision of resources to mitigate educational disparities are essential in such circumstances. The perceived drop in the standard of education, partly due to the move to online learning and less face-to-face interactions, made the enforced changes over exam cancelation and the use of predicted grades even more worrisome for some children and young people. This led to an increase in stress and anxiety and in turn had a negative impact on educational attainment.

b. The impact on school attendance

8.   There is a significant risk of long-term harm to many children and young people from not attending school. This relates both to children and young people who did not attend school during the lockdowns and lost out on that period of in-person learning and development, but also to the worrying large cohort of school age children who continue to stay away from school for a myriad of reasons including mental health, anxiety, fear or disillusionment. Schools are not simply places of learning but also

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places of safety, shelter and human connection, with important social circles and development opportunities over and above the taught curriculum.

9.   When the normal cycle of school attendance was broken by the closure of schools, it became easier in some situations to remain off school when the time came to return. Some pupils who had a reason to dislike school, for example as the victims of bullying, enjoyed the benefits of not physically attending school and decided not to return. For many children and young people, particularly in transition years, it was very challenging to return and the difficulties this caused resulted in a negative impact on their emotional wellbeing. We are also aware that the department within the Education Authority ("EA") who enforce school attendance, the Education Welfare Service, are becoming ever more stretched in terms of staff and resource and as a result less parents and pupils are being held accountable for not attending. As indicated, NICCY is so concerned in relation to the problem of school absence and avoidance that we have initiated a detailed project on the topic and have no doubt that the pandemic will feature heavily in relation to the causes of this worrying trend.

c. The impact on the development of children and young people

10.   The pandemic impacted upon the access to community-based schemes and projects for various groups of children and young people. For example, the Voluntary and Community Sector provides excellent early-years support for infants and children, including those with chronic and complex needs. Such supports were limited during the pandemic due to the restrictions on in-person gatherings. NICCY wishes to highlight the impact of lost time upon the development of infants and children availing of these services generally, but specifically those with Special Educational Needs and Disabilities ("SEND") including chronic and complex needs. Some of those children missed out on what would have been formative years of assistance, and the importance of early intervention is well documented.

11.   Aligned with this is the impact of the pandemic on the development of social skills. A lack of school, after school, sporting or other activities for such a long period in the lives of children and young people led to social anxiety for some. A significant number of young people responding to the Young Life and Times Survey ("YLTS") carried out as part of NICCY's Covid Report: "*A New and Better Normal*" expressed concern that the isolation has impacted on their social skills and reported feeling very anxious about going out in public and having contact with people outside their households.

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Rather than looking forward to getting back to 'normality', many felt very stressed at the thought of hugging friends and family and being back in public settings when society reopened. They reported struggling with relationships. Our Covid-19 report highlighted that the restrictions on freedom of movement and association caused by the pandemic were very deeply felt by children and young people.

12. When YLTS respondents were asked *"What was the most difficult thing experienced by children and young people during the pandemic that must be addressed by Government?"*, social isolation and not being able to see friends was one of the most frequent responses, alongside educational disruptions and the impact on their mental health. The impact of the pandemic on those three areas was huge and taken together did have a large impact on the development of children.

13. The development of children was impacted by the stereotyping of them by some quarters. Throughout the pandemic, there was widespread stereotyping of teenagers and students as "super spreaders", often without evidence. Public narratives in the media and political rhetoric reinforced harmful assumptions that young people were irresponsible or selfish. This narrative was not only unfair, but it was also harmful. Young people who followed the rules, gave up their social lives, and stayed isolated were made to feel guilty for a crisis they didn't cause. This scapegoating damaged the trust young people had in government and the media, and in many cases, led to increased mental distress, self-blame, and division between generations.

d. The impact on the mental and physical health of children and young people

14. Before the pandemic, demand for child health services outstripped capacity and waiting lists were a growing problem which affected children's access to high quality care. During the pandemic, many statutory services scaled back their services, prioritising 'emergency', 'urgent' or 'essential' services. Due to this scaling back existing health waiting list issues and health inequalities in Northern Ireland have been exacerbated.

15. It is clear that during the pandemic there was an increase in the number and length of time children and young people were waiting for healthcare across a range of acute and community-based services. One example is that, between 2019/20 and 2020/21, there was a 24 percent increase (from 765 to 949). in referrals to Child and

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Adolescent Mental Health Services ("CAMHS") from Emergency Departments for young people presenting during a mental health crisis.

16. There was a marked reduction in the availability of primary health care such as dental and ophthalmic services throughout the pandemic, with access restricted to emergency care only. Research as part of the YLTS reported that 27 percent of 16-year-olds could not get medical treatment during the pandemic for a health issue not related to Coronavirus (e.g. from doctor, dentist, counsellor etc.)

17. A Queens University Belfast ("QUB") Report commissioned by NICCY *"A New and Better Normal: The Impact of Covid-19 on the Planning and Delivery of Children's Services: A Rights Review, August 2021"* looked to identify the impacts of the pandemic on the planning and delivery of services to children and young people. It found evidence that *"stopping vital public health and wellbeing services, that ensure children's right to survive and thrive, impacted greatly on children, especially those considered clinically vulnerable"* [exhibit CQ/3 - INQ000648146].

18. The report also reflected on tensions between professional groups within the healthcare system regarding the evidence base for decisions made to close or restrict access to facilities and services that impacted on children and young people, this includes some health screening programmes and respite services for children with disabilities and complex needs. With any future pandemic I believe it is important to ensure restrictions that include the closure of medical facilities or suspension of services are required to be proportionate in terms of the harm caused by their closure. This chimes with several reports that were critical of the disproportionate blanket application of health-related policy or guidance during the pandemic, referring to a lack of assessment of its implications for children as a group and a lack of service specific risk assessment and person-centred care around matters such as when and how services should close or reopen, and the implementation of policy around hospital visitations [exhibits CQ/4 - INQ000416258 and CQ/5 - INQ000075367].

19. At the time of the pandemic's emergence in Northern Ireland, the healthcare system was experiencing significant delays in service accessibility including increasing waiting times. Workforce capacity, resources, and financing were issues experienced by all five Health Trusts across Northern Ireland. The Northern Ireland Executive ("Executive") had reformed in January 2020 just prior to the pandemic after nearly three years of suspension and no government. It is important that any examination of

the impact of the pandemic upon children's health and wellbeing is examined in this context, understanding that difficulties in accessing services and provision of care and support were already apparent pre-pandemic and especially for infants, children and young people with disabilities. This unique regional context is discussed further at paragraph 31.

20. We have held longstanding concerns in relation to the provision of paediatrics and mental health supports for children and young people. Waiting lists in Northern Ireland for paediatric care, including specialist supports such as occupational therapy, are the highest in the UK and NICCY has monitored this with concern for some time. Also worrying are the growing delays in accessing mental health support, support that had already been under pressure pre-pandemic and is now trying to tackle ever-increasing demand, in part due to the impact of the pandemic. It is our understanding that the pandemic has had a detrimental impact on the delivery of both paediatrics and mental health services.

21. Perhaps the most devastating and widespread consequence of the pandemic for children and young people was its toll on mental health and emotional wellbeing. Isolation, uncertainty, disrupted routines, and the loss of social connection created a mental health emergency that already oversubscribed services were unprepared to handle. Children and young people reported increased levels of anxiety, loneliness, depression, eating disorders, and self-harm and were often left to manage alone. Mental Health waiting lists grew, school counselling paused, and youth spaces closed. leaving young people with nowhere to turn. It is also worth mentioned the impact the pandemic had on maternal mental health and that of their newborns and infants. Not having the usual post-natal support groups or interaction with other new mothers and babies impacted not only the mother and baby individually, but also as a bonded unit as a result of experiences they would normally have shared, such as mother and toddler groups or breastfeeding support groups, being suspended.

22. There is a growing body of international research which has documented the negative effect the pandemic and the associated restrictions have had on children and young people's emotional wellbeing and mental health. To illustrate this, research conducted in Northern Ireland through the YLTS and Kids Life and Times Survey ("KLTS") reported that 41 percent of Primary 7 respondents and 52 percent of 16-year-olds felt their mental and emotional health had worsened during the pandemic. This is against pre-pandemic prevalence data for Northern Ireland which estimates

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that one in eight children and young people have an emotional disorder such as anxiety or depression, and that rates of common mental health problems are 25 percent higher than in other parts of the UK. These stark figures were discussed in the Health and Social Care Board's "*Youth Well Being Prevalence Survey 2020*" [exhibit CQ/6 - INQ000648159].

23. Further research has found that children and young people are increasingly "self-diagnosing" with neurological conditions, mental illnesses, personality disorders, and/or other emotional wellbeing issues [Exhibit CQ/6a INQ000651898]. This can then result in self-medicating. It has been connected with trends on social media channels, as well as the wider inaccessibility of healthcare services. The increase has coincided with increasing numbers who have presented to clinical providers or psychiatric services since the pandemic. There is a concern that children and young people are inappropriately diagnosed and prescribed unnecessary medication. NICCY wishes to highlight the role of self-diagnosis among young people since the pandemic and the connection of same with the pandemic, particularly if this self-diagnosis has arisen due to difficulties in accessing healthcare providers.

e. The impact on children and young people who were socially-economically disadvantaged or living in poverty

24. Child poverty in Northern Ireland was of huge concern prior to the pandemic. My predecessor made it one of her key priorities when she came into office in 2015. By March 2020, around one in four children (22 percent) were living in poverty, equivalent to more than 100,000 children. There had been no sustained change in the levels of child poverty over the 18 years the data had been collated. Levels of child poverty in working households had been increasing for many years and by March 2020, two in three children in poverty in Northern Ireland (66 percent) were living in working households. Several commitments had been made by the NI Executive to develop anti-poverty strategies; however, the pandemic led to delays in the delivery of these.

25. In relation to the child poverty challenges the pandemic itself presented, the UK Government and Northern Ireland Executive recognised the importance of preventing unemployment, maintaining incomes, and ensuring access to shelter, food and other basic necessities. Over the months following the first lockdown the UK Government introduced programmes that sought to prevent job losses and protect the economy.

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Government schemes such as the Coronavirus Job Retention Scheme were introduced. Young people aged under 25 were significantly more likely to be furloughed than employees of other ages. Job losses were prevalent in sectors which have a relatively youthful workforce, such as hospitality. A lack of opportunities for new entrants to the job market such as education leavers disproportionately impacted children and young people. These impacts all increased the pre-existing problem of child poverty.

26.   The UK Government recognised the problem with new youth employment and set up the 'Kickstart' scheme in September 2020 aimed at helping young people get jobs and experience. The equivalent programme in Northern Ireland was significantly delayed. Given the devastating impact of the pandemic on young people's employment, it was very disappointing that the launch of this programme was delayed by more than six months compared to the programme in Great Britain.

27.   It is evident that some groups of children and young people have experienced the effects of the pandemic restrictions and school closures more acutely than others. Groups most negatively affected include children and young people from lower socio-economic backgrounds, those with SEND in mainstream and special schools and newcomer groups. The impact of poverty was acutely felt on families with children with disabilities. Surveys conducted on such families noted that 47 percent said their household income had decreased, with a further 50 percent stating it had remained the same [exhibit CQ/7 INQ000648725].

28.   After paying for food, an additional fundamental challenge for many families and young people on low incomes through the pandemic, was paying for essential utilities as many bills were higher during lockdown. Keeping homes warm was a particular challenge, especially for those who were homeschooling or for children and young people with particular medical conditions or disabilities.

29.   One impact on the education of children who were living in poverty was the fact that remote learning necessitated the need for online learning via the use of electronic devices. A barrier to learning, and one that impacted most upon children from lower socio-economic backgrounds, was the lack of access to suitable devices or reliable internet connections. As is referenced in Koulla Yiasouma's statement and her 2020 Judicial Review interventions in JR115 and JR116, NICCY highlighted the critical need for consistency and quality in the provision of remote learning and repeatedly

called on the Department of Education and EA to provide supports to children, young people and their families to fully engage.

30. The additional costs of food, technology, educational items required through lockdown, coupled with furloughed wages, unemployment or the threat of unemployment, and restrictions on childcare placed families under a great deal of pressure through the pandemic. In *"A New and Better Normal"*, NICCY called for a determined effort by the Executive to support those who have fallen into poverty, or indeed into deeper poverty and highlighted there was a danger that pre-existing inequalities would widen and become further entrenched. It is with regret that Northern Ireland remains without an Anti-Poverty Strategy. We have repeatedly called on the Executive to deliver a strategy that protects, supports and uplifts families across Northern Ireland. It is unacceptable that one in four children in Northern Ireland is living in poverty.

f. Regional impacts on children and young people

31. I turn now to some issues that are unique to Northern Ireland and that only impacted on children within the jurisdiction. Northern Ireland has a distinctive system of selective education and every year; primary 7 pupils who wish to attend certain grammar schools have to pass a transfer test to gain entry to their school of choice. The system is unregulated, and the test providers represent the grammar schools. NICCY has long advocated for a change to this system that places unnecessary and unacceptable pressure on 10- and 11-year-olds. During the pandemic this pressure was compounded by last minute postponements, cancellations, and confused and contradictory communications from the Department of Education and the test providers.

32. A very late decision was made to cancel the tests, with post primary schools drafting their own admissions criteria on a school-by-school basis. The Department for Education published guidance and recommended admissions criteria, however the guidance had no statutory basis and therefore was not compulsory. It resulted in different schools imposing differing criteria, some being unfair on certain children and a breach of their rights. As can be seen from Koulla Yiasouma's statement and her interventions in Judicial Review proceedings taken by Burns and JR140 on the admissions criteria for their intended schools, the way in which this situation was handled was largely disconnected from the rights and best interests of the pupils.

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33. In our Covid-19 Report "*A New and Better Normal*", we recommended that the Department for Education work with schools to establish contingency plans for post primary transfer, creating a set of common admissions criteria with statutory footing to ensure equitability and accessibility for all. The mistakes of the pandemic in this sphere and the negative impact the whole saga had on that cohort of primary 7 pupils, at such an important transitionary time in their education, cannot be allowed to happen again.

34. When the Executive's Programme for Government ("PfG") was being formulated in 2024, NICCY asked for children and young people to be adequately represented and called for the meaningful implementation of the Children and Young People's Strategy, the recommendations from the UN Committee on the Rights of the Child to be adhered to, and for Child Rights Impact Assessments to be conducted when devising and implementing relevant policies, strategies and delivery plans. We believe that strategies must be adequately resourced, meaningfully implemented and their impact monitored to ensure that they are effective.

35. The poor implementation of children's rights exacerbates inequalities, and this is especially so during emergency situations such as the pandemic. When the PfG was announced in March 2025, I was disheartened by the insufficient emphasis on the needs and rights of children and young people, particularly regarding child poverty and strengthening of their legal protections. Our calls for a specific outcome area dedicated to children and young people, as well as for mandatory Child Rights Impact Assessments for all legislation and policies was regrettably overlooked.

36. When discussing government strategies and policies, it is worth noting the Children's Services Co-operation Act (Northern Ireland) 2015. It requires co-operation amongst public authorities to contribute to the well-being of children. NICCY believe the Act is not being used in the manner it was intended, and more work is needed to ensure the rights of children are protected in government decision making, policy and practice. NICCY provided evidence to the House of Commons' Northern Ireland Affairs Committee in April 2023 outlining that despite the Act, co-operation in the delivery of services for children remains the exception rather than the rule [exhibit CQ/7a – INQ000651899]. We outlined we were disappointed that the duties imposed by the Act on all key agencies to co-operate in the planning, commissioning and delivery of children's services, to include the pooling of resources, were not being

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utilised. One area that could benefit from enhanced collaboration is the provision of SEND, given the well documented budgetary position of public finances and the poor coordination and communication between education and health in the identification, diagnosis, assessment and implementation of support for children of with SEN. I mention the Act here as this is a tool for public authorities to use when responding to any future pandemic and is something that is unique to Northern Ireland.

g. The impact on children and young people who were homeless or living in poor housing conditions

37.   Data suggests that children and young people have been significantly impacted by the pandemic from a homelessness perspective. While the number of households presenting as homeless had dropped when compared with the previous year (June - December 2020 versus June - December 2019), this was not the case for young people aged 16-25 years, where there had been an increase from 1,419 to 1,544. The increase in the number of young people requiring temporary accommodation placements was even more stark, an increase of 91 percent for 16- and 17-year-olds, and an increase of 176 percent for 18–25-year-olds.

38.   A 2020 Northern Ireland Housing Executive ("NIHE") Report highlighted: "*The data suggests that young people have been significantly impacted by COVID-19 from a homelessness perspective. Young people have different experiences of, and ways into homelessness than adults. They are frequently in 'hidden' homeless situations – staying with family, friends or other shared living arrangements – and lockdown measures, alongside loss of income, have seen many of these arrangements break down. Family tensions – always a key driver of youth homelessness – have also been exacerbated*" [exhibit CQ/8 - INQ000574858].

39.   To the credit of the Department for Communities, in May 2021, the Minister for Communities, announced that the NIHE Covid-19 'Reset Plan' on Homelessness would be fully funded, and provided a further £9 million investment to bring the full homeless budget for 2021-22 to £46 million. This was very much welcomed by NICCY.

40.   A range of schemes, both governmental and voluntary sector led, aimed to tackle immediate issues of concern for low-income households as Northern Ireland first went into lockdown. Concerns over access to food were combated through increased

food parcels and direct payments in lieu of Free School Meals. The Trussell Trust, which is a major provider of food aid in Northern Ireland, reported providing 78,827 food parcels in Northern Ireland from April 2020 to March 2021, of which 31,028 were to households including children. This was an increase of 75 percent from the previous year, the largest increase of any UK region, other than London. The Trussell Trust reported that *"children, and households with children, have been more likely to need to turn to food banks during the crisis. When looking at the number of parcels distributed, children are overrepresented among those receiving a food parcel"*.

41. Regrettably, service providers Trussell reported that the most parcels they had ever distributed occurred in 2023/24 when close to 91,000 parcels were distributed. Although this decreased by 15 percent between April 2024 and March 2025, there is nonetheless a worrying longer-term trend. The number of parcels delivered in 2024/25 was 71 and higher than five years ago in 2019/20. Sadly, it is also over four times (336 percent) the amount distributed ten years ago in 2014/15. In relation to children, the picture is equally stark. For a third year in a row Trussell distributed over 30,000 parcels to children. This represents a 68 percent increase since 2019/20 and reflects a similar rise (68 percent) in parcels provided to families with children over the past five years [exhibit CQ/9 - INQ000648161 for more analysis].

42. In addition to the food parcels provided to low-income households, on 26th March 2020 the Education Minister and Communities Minister announced the introduction of direct payments to families whose children would usually benefit from a school meal. Around 100,000 families received £2.70 per child per day for each day of term the schools were closed - paid directly into their bank accounts. While direct payments in lieu of Free School Meals were also made across the UK, the Executive led the way by the speed in which they took this forward under the first lockdown, then extending it to include school holidays and this should be seen as a positive example of where government acted decisively and quickly to assist children in poverty.

43. NICCY commissioned a report in February 2023 called '*A Place to Call Home: A rights based approach to understanding the lived experience of children and families facing homelessness or housing insecurity*' [exhibit CQ/9a INQ000651900]. In it, NICCY made a series of recommendations to government around the adequacy of housing provision, initial responses to homelessness and calls for a coordinated approach to service provision. Whilst the pandemic was not a central theme, it was

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mentioned by several families as an amplifying factor in the social isolation they felt due to their housing situation. Lockdowns and the closure of schools narrowed further their already limited avenues for social contact. Children were cut off from school resources like reliable internet, sufficient space or an environment more conducive to learning.

h. The impact upon children and young people who were in pre-school during the Specified Period

44. It is right for the Inquiry to consider the impact on younger children who were not as 'school ready' post pandemic as they would have been had the normal pre-school services been available to them. This has been linked to the relative lack of support from health visitors during the pandemic and limited opportunities for socialisation with other children as nurseries closed. A recommendation from our *"A New and Better Normal"* Covid Report was that Education and Health bodies should report on how they have identified, met, and will continue to provide for the needs of vulnerable children, which includes those in the early years of life.

45. Of note when speaking of Early Years is a project undertaken by Playboard in collaboration with Stranmillis University College and the Controlled Schools' Support Council to examine the impact of Covid on play in early years classrooms, with a particular focus on Nursery and Foundation Stage. Over half of respondents (59 percent) felt that restrictions impacted negatively on children in terms of their social skills, their levels of independence, their ability to stay on task and overall enhanced anxiety. However, a sizeable minority (41 percent) of those responding to the survey indicated that children were more independent in terms of self-care routines, more settled in class, happier and more relaxed, and displayed increased levels of resilience and coping skills. This study highlights that the impacts of the pandemic are not binary in terms of either positive or negative and there is a range of opinions on the impacts upon children [exhibit CQ/10 - INQ000648125].

i. The impact on children and young people of increased access to and use of technology and social media

46. It has been well documented that the use of online mediums by children increased exponentially during the pandemic, not least because some of these were used to support their on-line education in the absence of access to a teacher. However,

research has found that there was a documented increase in Image Based Sexual Abuse in the UK, including the sharing of intimate images [exhibit CQ/10a - INQ000651371]. There were increased risks of online harms for children and young people during the pandemic, including online harassment and grooming. The increase in online harms has inevitable implications for mental health and wellbeing and is something the Inquiry will rightly delve into in more detail.

47. Misinformation around vaccines was a problem we encountered in Northern Ireland. A heavy, and in some circumstances inevitable, reliance on obtaining information on-line or an increase in resorting to on-line research exacerbated the spread of disinformation. Much of this was found in the context of healthcare provision including the development and rollout of the Covid-19 vaccinations. NICCY has sought to highlight the impact of the disinformation / anti-vaccination narratives both during and post-pandemic and the implications for infants, children, and young people's health and development. We highlighted the reliability of information in our August 2021 Covid-19 report 'A New and Better Normal'. The disinformation spread to vaccines generally, with a worrying reduction in the uptake of standard immunisation programmes, with obvious concerns for public health as a result.

48. Some of the barriers to education mentioned previously have relevance here, with a lack of access to electronic devices as well as to reliable internet service stymying attempts by children and young people to learn remotely. Some children from a rural background had issues with access to the broadband network. Access to the internet became essential for education and everyday living and the digital inequalities that exist in society impacted upon children's access and use of technology.

49. In respect of social media, NICCY is concerned in relation to the increase in social media use brought on by the pandemic and potential online harms in the form of grooming and exploitation. As already indicated, disinformation was also rife on social media platforms and more needs to be done to regulate the social media providers in relation to such disinformation and harmful content on their platforms. It is a positive that strides are being taken following the introduction of the Online Safety Act 2023 ("OSA"), which applies to Northern Ireland, to make the providers more accountable for the content that they allow onto their sites. Full implementation is not expected until 2026. It is being implemented in three key phases by the Office of Communications ("Ofcom"), illegal content, child safety, and categorised services respectively, with the first phase being due to be fully implemented by March 2025.

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We are therefore a long way from ensuring that social media and wider internet use is a safe space for our children and young people. In particular, it will need to be seen how effective Ofcom is in implementing those phases. NICCY has actively engaged with Ofcom's consultations on the Online Safety Act and, as part of our safeguarding work, intend to monitor the implementation of the Online Safety Act as it progresses.

j. The impact on children and young people in need or at risk, or subject to a protection plan

50. Before looking at the impact of the pandemic on children in need or at risk, it is important to highlight that Northern Ireland is consistently reporting a higher proportion of children in need than other countries in the UK. When the pandemic started, NICCY was concerned that there would be a decrease in the number of new referrals to statutory agencies as we believed the closure of schools would mean vulnerable children were not being seen every day in schools by educational professionals who can recognise the indicators in terms of abuse. NICCY stressed the importance of the reopening of schools for this reason in an advice paper in June 2020 entitled *"A Child's Right to Education and Covid-19 - Next Steps, A Child Rights Approach"* [exhibit CQ/11 - INQ000648126]. My predecessor also highlighted the need to keep statutory services open at all times during the pandemic for at risk children when writing to the Chair of the Health Committee in May 2020 [exhibit CQ/12 - INQ000648127].

51. Looking at the annual statistics provided by the Department of Health, the number of children in need as at 31st March 2020, roughly the start of the pandemic, was 22,414. By 31st March 2021, it had risen by 3 percent to 23,095. By 31st March 2022 it had risen by a further 6 percent to 24,545. Interestingly, the number then dropped by 7 percent the following year and another 2 percent the next year so the figure on 31st March 2024 was 22,450, nearly the same as that in March 2020. This data suggests that the pandemic caused a marked increase in children in need but over time the figures equalised, and we have returned the levels seen pre- pandemic. The latest annual published figures are exhibited as CQ/13 - INQ000648128.

52. In the immediate response to the pandemic, a Vulnerable Children and Young People Plan was brought forward by the Executive and developed by the departments of Health, Education, Justice, Economy and Communities [exhibit CQ/14 - INQ000648129]. The plan sought to embed a cross departmental and multi-agency

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approach and to establish a broad definition of children who were particularly vulnerable to the impact of Covid, to include children in need. While the development of the Plan and the close contact between the Department of Health, Health and Social Care Board and Trusts throughout this period were clearly very positive, there are a number of concerns regarding the effectiveness of the Plan to date. In NICCY's November 2020 response to the consultation, the need to ensure a robust child rights underpinning to the Plan along with a clearer focus on outcomes for children and identification of monitoring data was stressed [exhibit CQ/15 - INQ000648130]. This included a strong recommendation, given the stated intention of the Plan to use available facts, statistics and evidence to identify emerging issues, that *"information and data sources are identified and included in the Plan now to ensure robust monitoring and evaluation from the outset, and to respond to changing need"* with any gaps being filled as quickly as possible.

k. The impact on children and young people with disabilities or special educational needs

53. Existing barriers in accessing support and services for children with disabilities or complex health needs significantly worsened during the pandemic. A study by Family Fund reported that approximately 7 in 10 families with disabled children experienced a reduction in both formal and informal support during the pandemic, and that a reinstatement of support has been slow.

54. Schools have an extensive role in the lives of children and young people with special educational needs or disability because they often provide a range of interventions to meet children's health and care needs, on top of their learning. Many schools also have specialist resources and equipment that aren't easily accessible elsewhere, such as therapy pools, sensory rooms, and adapted outdoor play equipment. The loss of specialist support through the closure of schools, along with respite or day services has had a profound impact on this group of children and young people.

55. In terms of education, it is obvious that the closure of schools had an impact on the lives of all children and young people, with the majority of those impacts being negative. There would be some children, such as those who dislike school due to being the victim of bullying, who would have viewed school closures as a positive thing. It is also evident that some groups of children and young people experienced the effects of school and nursery closures more acutely than others. Groups most

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negatively affected included children and young people with SEND in mainstream and special schools. With the specialist education that such children get in schools, it was impossible for parents to provide the same level of support and advice to their now at home children and so these families experience new challenges they would not have before the pandemic.

56. The research conducted by QUB on behalf of NICCY (see paragraph 17) emphasised the difficulties arising for families as specialised services and care for children with complex health needs and children with disabilities were effectively withdrawn for a number of months. This included therapies, special education, respite care and in many cases, carers coming into the family home. The impact on families was profound. Representatives from the disability sector spoke to the QUB researchers of parenting stress, anxiety, isolation, fear and exhaustion as the full weight of caring fell to them.

57. Such challenges are consistent with the reports NICCY received about the experiences of parents/carers of children with SEN and disabilities. Many parents/carers informed us of the profoundly detrimental effects on the education, health and wellbeing of children with SEN and disabilities, as well as on their own parental health and wellbeing, as a result of school closures and the temporary suspension of pupil support services and other fundamental services.

58. In addition to the withdrawal, closure or pausing of formal supports for some children, evidence highlights the negative impact for many families of no longer having access to informal supports. The impacts on family services and supports were greatest for vulnerable groups and specialised services, such as those families that needed support for their child/ren with SEND.

59. Another area of concern for NICCY in the health sphere are the issues within the transition process of health and social care generally, but specifically within disability services. There appears to be a disparity in approaches and support across the five Health Trusts in relation to transitioning in disability services, with an example being the differences in accessing respite care support across the five Trusts. It is important this is flagged as a matter of concern as regards the impact of the pandemic upon children and young people with disabilities and for their families.

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60. NICCY is also concerned about the impact of the pandemic on the transition between CAMHS and Adult Mental Health Services, particularly for young people who also have a diagnosis or are awaiting a diagnosis of Autism Spectrum Disorder ("ASD") and/or Attention-deficit/hyperactivity disorder ("ADHD"). Given the increased demand on CAMHS caused by the pandemic, there are in consequence more young people requiring the transition to adult services.

61. It is also important to highlight that the pandemic impacted upon referrals and assessments for ASD and ADHD. The pandemic led to increasing delays between initial assessments, appointments, diagnosis confirmation, and arrangement of further care and support. Increasing waiting lists for SEND, including ASD and ADHD, has also resulted in an upsurge in families seeking assessments by private healthcare providers. However, private diagnoses do not equate to the provision of treatment by the National Health Service, and so even if it accepts the diagnosis provided by a private provider, families face further waiting lists for any subsequent treatment.

62. The SEND population has steadily increased by 5 percent per year in recent years, requiring increasing levels of support from the healthcare system to assess and support infants, children, and young people with SEND. Delays in accessing assessments, and subsequent treatment results in delays within the statementing process. There is growing evidence suggesting a connection between SEND and substance use disorders ("SUD") including the use of substances to "self-medicate" and the risk of harmful behaviours such as substance use among undiagnosed persons with ASD and/or ADHD. We wish to highlight the role of self-medication among children and young people with ASD and ADHD and the connection of same with the pandemic, especially the connection with accessibility of services.

I. The impact on children and young people in the care of local authorities

63. A reduction in the normal levels of social care support to vulnerable families led to increased pressures within those families, an increase in family breakdown and a corresponding increase in the number of children and young people being taken into care. From the beginning of the pandemic to the end of April 2025, there has been a steady increase in the number of children and young people in care in Northern Ireland. There has been a rather concerning 24 percent increase in the number of children in care since April 2020 (3,351) to April 2025 (4,171). This is the highest ever

recorded number of children in care since the introduction of the Children (Northern Ireland) Order 1995. It is also the highest percentage increase.

m. The impact on children and young people leaving care

64. Research published by Voice of Young People in Care and QUB in February 2021 [exhibit CQ/16 - INQ000648131], reviewed the experiences of young people leaving care during the pandemic. Five key themes emerged from the study, which further reflect the adverse impacts of the Covid-19 response on young people in care, including with regards to disrupted relationships and limitations on access to professional support:

    - **Disruption**: This included disruption to family relationships and social contacts, changes to education and employment, cancelled international trips and delays to the delivery of treatment or services. Young people who were leaving care faced complex challenges moving into new living arrangements and had less access to support during this time;

    - **Continuities**: Some young people noted they were socially isolated before the pandemic so little had changed;

    - **Individual Responses**: The study found most young people understood and complied with the lockdown restrictions put in place. They developed a range of coping strategies to alleviate the boredom and anxiety including games, exercise and other activities;

    - **Mental Health and Wellbeing**: As many became more reliant on close family during the pandemic, for care leavers who had limited social networks, the social distancing measures and other restrictions imposed by the government increased their isolation and detrimentally impacted their mental health. Many of the young people said the pandemic had a negative impact on their emotional health and wellbeing. A number spoke about experiencing depression, anxiety and social isolation;

    - **Access to Professional Support**: Young people had mixed reactions to the support provided by their social workers and other key workers. Many appreciated their social workers staying in touch during very difficult circumstances. Most note that there needed to be a transition from face-to-face to virtual contact. However, some disappointment was expressed at the lack of contact from social workers.

65. One of the first issues of concern identified as Northern Ireland went into lockdown was access to food and paying additional costs, particularly for low-income households. As the QUB research found, some groups of children and young people were more vulnerable than others, for example young care leavers struggled to access essential household items including food, toiletries and cleaning supplies, as well as paying for utility services, such as electricity and home heating.

66. Children's Social Care (Coronavirus) (Temporary Modification of Children's Social Care) Regulations (Northern Ireland) 2020 changed aspects of the delivery of social care services, including how statutory visits and review meetings took place. The regulations were introduced by the Department of Health in order to reduce pressure on statutory services through the dilution of statutory obligations across a wide range of areas affecting children.

67. NICCY wholly accepts the need for the Department of Health to undertake emergency planning to ensure that child protection and social care arrangements could continue to operate during the pandemic. However, as NICCY consistently expressed throughout the pandemic, these emergency measures must only be introduced as a last resort given that they weaken statutory obligations to protect and support vulnerable children. The detrimental impact of such wide-ranging modifications should be used as a lesson for future public health emergencies, and I believe there needs to be more effort made to target modifications in a way that reduces the overall impact to individual groups such as children and young people. A one size fits all policy is a blunt instrument and the experiences during the pandemic and the lessons learned, should allow agencies to plan better and offer bespoke solutions for varying subsections of society.

n. The impact on children and young people in the immigration system

68. As discussed previously, some groups of children have experienced the impacts of the pandemic more acutely than others. One group negatively affected includes children from newcomer groups. Research shows that the pandemic reinforced the barriers for asylum seeking families in accessing support and other resources during the pandemic, including educational provisions. It also reflected a particular impact on newcomer children who had arrived with their families to Northern Ireland in February 2020 and who would usually have received intensive support over a number of months to settle into their new homes and schools. School closures clearly not only

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had an impact on the education of newcomer children but also on settling into a new country – and learning a new language - at a critical time in their lives.

69. The pandemic has also highlighted the additional barriers of remote learning for children with English as an additional or new language for whom learning materials were not necessarily provided in an appropriate format or with translation capabilities. This was compounded by issues around access to digital devices and the internet and the availability of suitable spaces in which to study for those in a hotel or temporary accommodation.

70. In terms of safeguarding and young people subject to immigration control, the impact of the pandemic on feelings of isolation and stress and the challenges caused by a lack of social and other activities and visits was evident. Children and young people subject to immigration control told NICCY in our focus groups for *"A New and Better Normal"* that the pandemic led to feelings of isolation and stress and the challenges caused by a lack of social activities and visits were evident. Concerns were expressed about reductions in face-to-face contact with key professionals, such as social workers and legal representatives, including in relation to preparing for key events such as asylum interviews with the Home Office. Their experiences also highlighted the particular difficulties for separated and asylum-seeking children who may have arrived in Northern Ireland just prior to, or during, the pandemic period and who did not have pre-existing friendship networks, school or college connections or sporting or faith community links to draw on. It is across this full range of relationships, contacts and activities that children and young people's protection is embedded.

71. The pandemic led to the use of hotels as "contingency accommodation". This created specific safeguarding issues for the Home Office and the Mears Group plc ("Mears"), the company contracted to provide the accommodation. Despite NICCY and others raising concerns about the safeguarding within contingency accommodation, Mears' safeguarding policy was only finally published in 2024. Now with the closure of most of the family hotels the focus has shifted back to dispersal accommodation which creates different safeguarding challenges, challenges that do not seem to have been addressed. This example illustrates that the rights of children and young people seem to lag far behind decisions taken in relation to accommodation and housing that affected them, when they should be considered in advance of such decisions.

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o. The impact on children and young people who were in custody (or otherwise subject to detention)

72. The processes and arrangements in place for young people admitted to the youth justice system were significantly impacted by the pandemic. Staff in the Juvenile Justice Centre ("JJC") were concerned about how they could 'balance' the ways in which they could deliver a service to 'look after the children' as well as 'protect and look after staff as well'.

73. As part of the research for *"A New and Better Normal"*, NICCY engaged both with Hydebank Wood Young Offenders Centre ("YOC") and JJC, meeting with children and young people and visiting the JJC. We spoke to both institutions about their arrangements during the Covid-19 period and the impact on children in their care. During the pandemic, appropriate sanitising procedures were put in place; visiting restricted and social distancing guidelines implemented. In both institutions, external providers of services were reduced and kept to a minimum and all family visits and court appearances conducted remotely. The cessation of all external visitors to the JJC, was described by staff as *"the most difficult thing for our young people"*. Children and young people were also impacted by enforced isolation, increased time in cells/rooms and lack of social contact in response to Covid-19. NICCY raised all these concerns with the relevant authorities and sought assurance on how the impacts were being mitigated. We highlighted particular concern about the levels of education made available to the young people in the JJC during the lockdown, an issue raised with both the Youth Justice Agency and the EA.

74. Children and young people held in the JJC experienced increased separation from their families and other services due to the ceasing of in-person access to visits and services. They were isolated upon admission in a form of quarantine that led to feelings of isolation. They could no longer meet parents, siblings and other family members in person, but this had to be through online means. Online visits were hindered by poor IT equipment, and it was difficult to build relationships that would normally have been helped by in person contact, for example with social workers. Whilst restrictions reflected what occurred in the community, the impact is potentially more significant for children in the JJC particularly with regards to feelings of isolation and being further disconnected from their community.

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75. With regards admissions, annual comparison of the average number of young people admitted to Woodlands JJC revealed a significant reduction in the total number of admissions. Whilst the JJC representative interviewed by QUB noted that *"a lot of young people have got access to bail"* and there was a sense of increased flexibility in swift decision making about sending young people to JJC, evidence suggests that there is still a continuing trend of children and young people being placed on remand. Lack of suitable accommodation or bail address continues to be one of the main reasons that young people are held in custody. It is against a child's right to deprive them of their liberty for this reason.

76. Services available to children and young people within custodial settings, services that aid rehabilitation or encourage education and personal growth, were all curtailed. Services provided by the Youth Justice Agency ("YJA") could not proceed, Youth Conferences could not take place as they used to, and whilst the impact of the closing of schools will rightly be examined by the Inquiry in this module, the impact of the suspension of visits and other services on children and young people within the JJC should also be considered given the long terms effect this had.

77. Mental health charity Mindwise ran a project called "Linked In", which provided guidance to children and young people leaving police custody. Face to face contact is important to maintain a routine and to fully engage with support services and this was taken away during the strict lockdowns. Mindwise staff reinstated their face-to-face meetings with clients as soon as they felt it was safe to do so, and in line with health guidance. However, children and young people were impacted by isolation during the periods of restriction. This quote from a young person illustrates this point of view:

     "I have been able to see x and my social worker face to face however my mental health appointments are over the phone which I don't enjoy as I don't like talking on the phone."

78. A further consequence of the restrictions was that all Court appearances took place remotely. The possibility of this being positive and less traumatic for children and young must be considered alongside the potential negative consequences that range from justice not being seen as open and transparent if the child or young person is not present in person, to the difficulty of carrying out effective probation reports if they have to be completed virtually. The Inquiry will be aware of the pre-existing problem

of delay within the Court system, an issue that was already deteriorating before the pandemic but was undoubtedly exacerbated by the pandemic. Youth Justice did not escape the impact of increased delays whilst the justice system adapted to the online world. In a recommendation from our "*A New and Better Normal*" Report, we asked that all children and young people must have reasonable adjustments to meet their needs during Court proceedings, including access to an independent advocate. A study into adult family Courts during Covid-19 highlighted problems with fairness, participation, accessibility and timeliness, with the administration of justice being let down [exhibit CQ/17 - INQ000648132]. A similar study does not exist for the Youth Court; however, we suggest the issues would be similar.

79.   For children and young people with parents in the prison system, the closure of prisons, suspension of visits and the introduction of virtual calls would lead to parental separation and lack of physical connection between parents and children. They reported that zoom or telephone contact was reduced compared with the length of usual face-to-face visits. Given the importance of family engagement in maintaining relationships, it's critical that provisions are made to ensure that there is disruption to contact between children and young people and their family members for as little time as possible in the case of future emergency situations.

80.   NICCY can confirm that throughout the pandemic the YJA and JJC were very open to engagement and advice, and they are agencies that are crucial for the Inquiry to approach in relation to the impact on children and young people in the youth justice sphere.

p. The impact on children who were subject to supervision orders

81.   NICCY does not have access to separate data streams in relation to the number of children and young people that are subject to Supervision Orders as the Department of Health, who provide statistics on children in need, looked after children and those on the child protection register, do not provide data on Supervision Orders. It is therefore difficult for me to comment with precision on the impact on them aside from more general comments around the lack of face-to-face access. Supervision Orders are sought by a Health and Social Care Trust when it is assessed that a child is suffering, or is likely to suffer, significant harm due to the care given or if the child is beyond parental control. Under a Supervision Order, a supervisor is appointed to help the child so that the Trust can make sure that are getting properly cared for. It is

a tool the Trusts use to both ensure a child is safe and to assess whether they need to apply for a Care Order.

82. During the lockdowns, a major problem with Supervision Orders was that social workers were not able to carry out their normal checks, meaning that there would not have been an awareness of whether circumstances were getting better or worse. That is true of children who were on the threshold of needing a Supervision Order and also for those children subject to such an order and potentially in need of a full Care Order. With no face-to-face checks, it is very possible that children who engaged with their social workers or supervisors virtually, did not verbalise all issues they had or did not display the normal concerning warning signs that they would naturally have done if the engagement was face to face. It is an area of the pandemic's impact that is therefore difficult to quantify from a Northern Irish perspective.

q. The impact on children who were young carers

83. According to the 2021 Census there are over 17,500 child and young adult carers in Northern Ireland, representing approximately 8 per cent of all unpaid carers. This figure includes over 2,500 who are under 15 years and 550 under 10 years. The lockdown restrictions including the closure of schools, resulted in an increased workload and resultant pressure for these young carers, with in-person health services being cut off from their parents / relatives. It also meant they did not have school as an opportunity to socialise with friends and get out of their home environment, and it is correct to class them as a vulnerable group in terms of the pandemic.

84. In our "*A New and Better Normal*" report, we conducted focus groups with cohorts of vulnerable children and young people. Action for Children assisted us with obtaining written feedback from Young Carers. In relation to the importance of play, leisure and social engagement, a number of children and young people talked about the importance of being able to get out of the house and to see friends as a way to escape pressures at home. Through their written input, young carers explained that for them this meant continued social isolation, even during periods where others could get out, as despite their need for a break from their home situation they did not have the luxury to leave their charge. This further impacted on feelings of loneliness, and poor mental health.

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85. Qualitative feedback provided by young carers highlighted how the pandemic impacted upon their caring role. They spoke about increased social isolation and expressed anxiety about a return to normal life, including in the context of where a parent or sibling may be shielding. The young people said that they missed social activities with their friends and felt lonely. There was reference to an increase in caring responsibilities over the course of lockdown. There was also reflection that they felt low because of the pandemic and that Covid had impacted on their general mental health. Two contributors added:

"Lockdown is an anxious time but I'm looking forward to getting back to some sort of normal"

"I feel like a lot of young people isolate themselves, especially young carers, like most of my friends who are young carers have just sort of isolated themselves"

86. This social isolation and increase in concern for the impact on their mental health does speak to the fact the young carers, whilst being amongst the most resilient and mentally tough cohorts of the young population, had difficulty in navigating the pandemic for unique reasons.

87. Going forward, a group of Young Carer Champions from Barnado's NI met with the Minister for Health in August 2024 to highlight the need for legislative change to provide dedicated laws as exist in England, Scotland and Wales (for example the Carers (Scotland) Act 2016 especially taken with the United Nations Convention on the Rights of the Child (Incorporation)(Scotland) Act 2024) to protect young carers and help to ensure that no child is providing care at cost to their own health, wellbeing or development [exhibit CQ/17a INQ000651888]. They also drew the attention of the Minister to the fact that the census figure underrepresented the numbers of young carers with the true total figure likely to be closer to 30,000. There is therefore an urgent need to ensure that there is accurate recording of the numbers of children and young people and their well-being to ensure there are appropriate supports. The issue of data collection was discussed in NICCY's response to the draft PfG [see exhibit CQ/37] which confirmed that the collection and reporting of adequate, disaggregated data on children is one of the most consistently problematic issues NICCY encounters. The under representation of young carers is another example of the poor data collection in terms of children and young people.

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r. The impact on children with Long Covid

88. Throughout the pandemic, the evidence indicated that children and young people were at the lowest health risk from Covid-19, with the highest risk being the elderly and those with certain underlying health conditions. Yet whilst the prevailing evidence is that the direct health risk from Covid-19 on most children and young people is low, there were undoubtedly some who reported ongoing symptoms such as fatigue, laboured breathing, heart palpitations, chest pain, headaches, difficulties in concentrating, muscle weaknesses and sore throat for months after being diagnosed with Covid-19. The significance for them of this post Covid-19 condition was clear from the reports we received. The impact on their education and social networking in particular is well captured by a 2023 study, *'Impact of Long Covid on the school experiences of children and young people: a qualitative study'* [exhibit CQ/17b – INQ000651889], which was based on interviews in which children and young people described their absences from school as stressful and isolating and placed a high importance on going back to school full-time as a means of 'returning to normal' yet often found re-engaging with school could lead to relapses, and further absences meaning they had to learn how to deal with the demands of school without pushing themselves to 'crashing' point.

89. Despite the repeated reports of Long Covid and its impact, there was uncertainty over the diagnosis, phenotype, prevalence, duration and treatment in children and young people. In response the 'Data Resource Profile: the Children and Young People with Long Covid (CLoCk) Study' [exhibit CQ/17c – INQ000651890] was established essentially to describe the phenotype, produce a definition, and establish the prevalence of Long Covid in children and young people. It was the world's largest longitudinal cohort study on Long Covid in children, but its data is limited to England and those in the 11- to 17-year-old age group. I am not aware of any comparable study being carried out amongst children and young people in Northern Ireland, which is regrettable given the demographic differences. NICCY is not in a position to carry out such a study, but it has consistently called for better data collection. Koulla Yiasouma and I refer throughout our statements to the need for robust data that can support the development of the necessary development of policy development and required decision-making.

90. Despite that, it is worth noting a University College London study and published in 2022, *'Prevalence and Characteristics of Persistent Symptoms in Children During the*

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COVID-19 Pandemic: Evidence from a Household Cohort Study in England and Wales', identified the prevalence of Long Covid in children with a history of infection as over 4.5 percent [exhibit CQ/18 - INQ000648133]. This was based on a different data set to the CLoCk study, but from the Northern Ireland perspective it still suffers from the same geographic limitation.

91. A subsequent 2024 study by Great Ormond Street Hospital and University College London, 'A 24-month National Cohort Study examining long-term effects of Covid-19 in children and young people', using the CLocK data found that 7.2 percent of children and young people consistently met the Long Covid research definition at 3, 6, 12 and 24 months post infection. It highlighted the importance of conducting longitudinal studies and the need to consider further clinical impairment and the range of symptoms [exhibit CQ/19 - INQ000474714]. Other studies have also found a significant, long-lasting impact of Long Covid in children and young people, with some still symptomatic 36 months after the initial infection [see exhibit CQ/19a – INQ000651891]. They too have highlighted the need for more research.

s. The impact on children who were clinically vulnerable, immunosuppressed (or lived with such family members)

92. As has been discussed before, prior to the pandemic, Northern Ireland had the worst health waiting lists in the UK. The QUB report commissioned as part of "*A New and Better Normal*" found evidence that "*stopping vital public health and wellbeing services, that ensure children's right to survive and thrive, impacted greatly on children, especially those considered clinically vulnerable.*" Whilst the whole population was anxious about catching the virus and weary of the potential serious implications, this anxiety was greatly amplified for those children who were clinically vulnerable or immunosuppressed or indeed lived with such family members.

93. Before the vaccine was available and circulation of the virus was high, anyone deemed vulnerable to the virus was advised to isolate and informed that they would receive notification from their doctor or clinician via a shielding letter. In September 2020, the Royal College of Paediatrics and Child Health ("RCPCH") raised concerns with NICCY about the robustness of the existing system to ensure that clear, accurate and timely information was being sent out to all clinically vulnerable children and their families.

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94. At that time all jurisdictions of the UK, apart from Northern Ireland, had adopted RCPCH shielding guidance that included appropriate accountability for Trusts and medical directors supporting child health professionals. NICCY wrote to the Chief Medical Officer ("CMO") seeking assurances that adequate measures were in place and was informed that guidance had been distributed to all relevant services. Yet by April 2021, the RCPCH remained concerned about whether the system was robust enough to accurately identify those children who were clinically vulnerable to Covid-19.

95. In December 2020, at the beginning of the vaccine roll-out in Northern Ireland, the Joint Committee on Vaccination and Immunization ("JCVI"), advised that vaccination of certain groups of clinically extremely vulnerable 16- and 17-year-olds was reasonably safe and effective. This was welcomed and a young person aged 17 years old with a heart condition reflected on their experience of the pandemic and how receiving the vaccine reduced their anxiety about catching the virus:

    "I found returning to a social setting after shielding was hard as I was very anxious and nervous about seeing people at the risk of possibly catching the virus. However, since I returned to school I was a lot more relaxed and especially now since I have got my two vaccines I am not as anxious or worried."

96. For the first 7-8 months of the vaccination programme roll-out, under 16's, including those deemed extremely clinically vulnerable were not offered the vaccine due to a lack of data to determine the risks and benefits. This often meant very lengthy periods of shielding and ongoing stress and anxiety for children and their families. One respondent to the YLTS stated:

    "My little brother has medical issues and they were frightened at how it would affect him if it came into our home. They were worried about us all but his body cannot fight infection. We had not been in contact with anyone other than our household and all groceries etc were delivered to garage so they were very nervous."

97. NICCY therefore welcomed the July 2021 offer of the vaccine to some young people aged 12 years old and over if they had an underlying health condition that put them at higher risk of Covid-19 or if they lived with someone who was immunosuppressed. We further welcomed the extension of this to clinically vulnerable children from age 5 - 11 years in December 2021 and finally to clinically vulnerable children from aged

6 months to 4 years in December 2022. We agreed with the JCVI's position that focus should be on the potential benefits and harms of vaccination to children and young people themselves, with prevention of severe Covid-19 (i.e. requiring hospitalisation or leading to death) in children and young people being the primary aim.

98. We are thankfully now in the position that the virus has been well contained and the experience that the pandemic has provided for health systems can and must be properly analysed and used to inform the planning and preparation for future pandemics. Considerations around children who are clinically vulnerable need to be at the centre of such plans.

t. The extent to which children were at increased risk of or suffered physical, sexual or psychological abuse

99. Whilst many children and young people were able to remain safe in their homes as the population remained locked down, for some vulnerable groups, there was an increased risk of domestic violence and abuse. While it is very positive that the vast majority of children (91 percent) taking part in NICCY's commissioned Kids Life and Times Survey and Young Life and Times Survey reported that they felt safe at home during the pandemic, it is also important to recognise that some did not and that violence by parents and other caregivers is the most common form of violence experienced by children and young people. It should be noted that 91 percent of children who reported feeling safe may include young people who are exposed to the domestic abuse of someone else in the home, such as their mother, but who do not consider this trauma as direct personal risk, even though it does amount to emotional abuse. The UN Committee on the Rights of the Child was acutely aware of the potential risk from increased confinement to home for those children and young people for whom home is not a place of safety or security and where they may witness or directly experience violence and abuse at a time of reduced contact with professionals and others and minimal visibility outside of their immediate living environments. The risk of domestic violence and/or abuse during the pandemic was also discussed regularly in NICCY's Covid-19 report '*A New and Better Normal*' in the chapters on Education, Family and Alternative Care, Safeguarding and Youth Justice.

100. Schools that acted as a safe haven were closed off. This was exacerbated by the lack of face-to-face contact with a range of services, including social services, contact

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that can identify the warning signs of abuse. Reported incidents of domestic violence and abuse during the first lockdown increased in Northern Ireland.

101. NICCY repeatedly acknowledged the importance of addressing the public health crisis as swiftly and effectively as possible and recognised that in such circumstances the emergency response to public health concerns is rightly prioritised. However, the Commissioner was clear that, in line with human rights standards, any dilution, modification or lessening of protection standards for children and young people must operate only as a last resort, for the shortest time possible and must be subject to robust reporting and scrutiny.

102. We also acknowledge the severe pressures placed on health and social care systems and staff throughout the pandemic. Navigating how best to protect children while complying with rapidly developing public health guidance to minimise risk of infection and illness to children, their carers and staff was not a straightforward task. In the context of safeguarding, this includes addressing the challenges of ensuring that children were not at risk, were physically safe and unharmed, had access to devices for communication, were free and confident to speak openly during telephone or video calls, that abusers were not present, that safety plans were robust all the while taking account of restrictions and at times without face to face contact. Professionals had to try to ensure that meaningful relationships with vulnerable children were developed and maintained throughout the pandemic and the difficulty in doing all of this cannot be underestimated.

103. As the health crisis developed and schools, youth and community services, sporting clubs and the full range of face to face services and supports closed and stay at home regulations came into force, children's social care statistics began to illustrate the lack of visibility of vulnerable children with referral rates in general and child protection referrals in particular becoming more variable, with significant drops during periods of fuller lockdown.

104. It is important to reflect that children at risk of harm during the pandemic were often without access to their usual formal and informal support networks, to physical contact with trusted or protective adults as well as peers, while being confined in households that where often subject to greater degrees of pressure, stress and volatility. In viewing the pandemic through a child protection lens, the restrictions can

be understood as providing greater opportunity for abusers to exert control over and to harm children and to restrict the involvement of others in their lives.

105. ChildLine has highlighted that they received a significant increase in contacts from children about a wide range of safeguarding concerns in their home environments during the pandemic, including the increased use of physical punishment, exposure to domestic abuse and coercive control, the impact of increased parental use of alcohol as well as children being subject to physical and sexual abuse.

u. The extent to which children were at an increased risk of exploitation

106. Indeed, the pandemic and associated public health measures may not only have led to children and young people spending increased time in unsafe environments and with abusers but also exposed them to new sources of harm, such as an increased use of the digital world and in turn risking greater exposure to inappropriate and harmful content as well as grooming and online abuse. It has also been reported by Childline that young people have found themselves facing the trauma of past abuse and exploitation with the impact of this becoming more acute during the isolation of the lockdown periods [exhibit CQ/19b – INQ000651892]. Childline heard from children and young people who were experiencing distressing memories of non-recent online sexual abuse with this being the first time they were able to recognise what had happened to them previously had in fact been abuse. Some children told Childline that the lockdown conditions created by the pandemic made them feel lonely and disconnected leading some to use online platforms to meet new people. This in turn exposed them to potential new sources of harm.

107. It is worth noting that in response to the challenges and risks facing children, young people and their families due to the pandemic and the government's responses to it, a plan for '*Cross-Departmental Actions for Vulnerable Children and Young People during the Covid-19 Pandemic Period*' was brought forward by the Executive. The Plan was developed by the departments of Health, Education, Justice, Economy and Communities to establish a broad definition of children and young people particularly vulnerable to the impact of Covid-19 and to strengthen the system capacity to respond during the pandemic and subsequently as well as to rebuild services [exhibit CQ/14 - INQ000648129]. While the development of the Plan and the close contact between the Department of Health, Health and Social Care Board and Trusts

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throughout this period were clearly very positive, there were a number of concerns regarding the effectiveness of the Plan.

108. NICCY provided advice to the Department for Health at the time highlighting the need to ensure a robust child rights underpinning to the Plan, the need for timely and targeted supports to protect vulnerable children along with a clearer focus on outcomes for children [exhibit CQ/20a INQ000651893]. NICCY also highlighted concern about the lack of detail regarding the "*actions/possible actions*" associated with the Plan, for example, noting the lack of clarity about the interventions that would be put in place when vulnerable children did not attend school or the lack of concrete measures to be taken to prevent the exploitation of children in the context of paramilitarism, organised crime and criminality. NICCY felt the Plan had minimal impact and this was one of the reasons NICCY published "*A New and Better Normal*" in August 2021, containing a series of recommendations including 7.4 stating that feedback from the consultation on the Vulnerable Children and Young People's Plan should inform the Delivery Plan of the Children and Young People's Strategy.

III. **WORK CARRIED OUT BY NICCY IN RELATION TO AN INCREASED RISK OF VIOLENCE, SEXUAL VIOLENCE AND PSYCHOLOGICAL ABUSE DURING THE PANDEMIC**

109. The main piece of work carried out by NICCY during the specific period, "*A New and Better Normal*", has been previously referenced in my statement and it remains the only major report that my office carried out into Covid-19 and the experiences of children and young people in Northern Ireland. Within it, as referenced in more detail in paragraphs 47 and 99, issues of safeguarding and abuse are discussed and the areas of focus in this question are touched upon.

110. As previously discussed, for some vulnerable children home is not the place of safety it should be, and the restrictions and lockdowns meant spending more time in the presence of a violent or abusive relative or carer or being witness to domestic violence being perpetrated on others within their household. The restrictions had closed schools and curtailed services that children and young people would have relied on for respite from difficult familial situations. There was reduced contact with professionals who often spot the signs of abuse or enquire as to their wellbeing such as teachers or social workers. The loss of these formal networks, as well as the informal networks of friend's parents or sports coaches, increased the vulnerability of

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these children and young people which consequently increased the possibility of harm to them.

111. NICCY is not aware of how much the government and its agencies had foreseen such risks prior to the pandemic. However, the increased risk of harm to children and young people in situations where the population is locked down and services suspended should have been obvious. The management of such risks should therefore have been planned for and mitigations put in place. A potential lockdown should have been a concern for child protection agencies and action plans drawn up covering how best to keep in contact with vulnerable children and young people, how to assess their cases without face-to-face contact and how to ensure their safety during a potential pandemic. The fact that during this pandemic the authorities took time to get their processes up and running points to a lack of detailed or proper plans and is something that needs to be rectified for the future. Children and young people, and society as a whole, should be able to have confidence that they are safe, even in unprecedented times. The experience of the government's response to the pandemic has undermined the trust that some might have had at the outset and there is a job of work to be done to recover and develop it, otherwise there is a real risk that in the future there will not be the same level of compliance with government's measures as there was during the pandemic.

IV. STATISTICAL TRENDS IN RELATION TO CHILDREN IN NEED, OR AT RISK, OR ENTERING THE CARE SYSTEM SINCE THE END OF THE SPECIFIED PERIOD

112. It is worth nothing that collation, collection, and accessibility of health data in Northern Ireland remains an issue, with all five Health Trusts taking a different approach. This impacts analysis, particularly temporal and geographic analysis. Therefore, seeking to understand long-term impacts of the pandemic on children's health and service provision is problematic.

113. I highlighted some of the statistical trends in relation to children in need and those in care at paragraph 51 above. Turning to trends specifically from the end of the Specified Period (June 2022) to the most recent monthly figures released from the Northern Ireland Department of Health (April 2025), the number of children in care has risen from 3,590 to 4,171. This represents a 16 percent increase. The numbers of children in care have been consistently rising since the end of the Specified Period

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and sits at the highest ever recorded number of since the introduction of the Children (Northern Ireland) Order 1995.

114. The monthly data that outlines the number of children in care also outlines the numbers of children on the Child Protection Register, the number of child referrals to social services and the number of child protection referrals. They allow us to look at the trend from the end of the Specified Period until now. Taking those on the Child Protection Register, as of April 2025 that sits at 2,224. This is a reduction of 3 percent from June 2022 (2,289). It is worth nothing that the number of children on the Child Protection Register in April 2020 was 2,369. This shows that there has been a continued reduction since the pandemic began. Interestingly, as at 31st March 2019, 2.211 children were listed on the Child Protection Register, but by 31st March 2020 that number had risen to 2.298. This illustrates that the number was rising pre pandemic, before beginning to reduce during the pandemic.

115. In relation to Child Referrals to Social Services, there were 3,070 in June 2022 and that has reduced by 3 percent to 2,992 in the most recent figures of April 2025. Referrals reached nearly 4,000 in March 2023 (3,870), May 2023 (3,951) and June 2023 (3,993), which are the highest 3 months in the past 5 years. This may be related to the reopening of society post pandemic and the renewed access children had to school, play and social activities leading to more interactions with professionals and staff who could then identify concerns in a manner they could not do during the periods of restrictions.

116. In relation to children in need the most recent figures to which we have access are annual figures up to 31st March 2024. At that point 22,450 children in Northern Ireland were known to social services as a child in need. This represented 514 children per 10,000 of the child population. The number of children in need as at 31 March 2024 was 2 percent lower than in 2023 when there were 22,875 children in need. For these statistics, it is difficult to accurately separate the end of the Specified Period in June 2022 as the figures run from 1st April to 31st March each year. However, the closest temporal figures to the end of the Specified Period, those on 31st March 2022, do illustrate the impact of the pandemic on children in need. As at 31st March 2022, there were 24,545 children in need in Northern Ireland. Comparing that to the 2024 figures, it represents a 9 percent reduction between from 2022 to 2024.

117. It is worth highlighting that at the beginning of the pandemic, the figures for children in need sat at 22,414 in March 2020, which is nearly exactly the same number as 4 years later in March 2024 (22,450). What these figures illustrate is that the number of children in need increased substantially throughout the course of the pandemic to reach a peak in 2022, before recovering and returning to similar numbers by 2024. It is also worth highlighting that in several previous years in the past decade or so, the high 2022 figures (24,545) had been either matched or surpassed. The years 2019 (24,289) and 2016 (24,698) were similar to the 2022 amount whereas the highest number in the past 12 years was in 2014 when there were 25,998 children in need in Northern Ireland. I mention these to illustrate that whilst there was an increase in children in need over the pandemic, the statistics highlight pre pandemic years as worse from the perspective of children in need.

118. Overall, I consider that it would be beneficial to analyse trends from the statistical data when it comes to safeguarding and child protection. However, I would always seek for this analysis to be combined with direct engagement with the safeguarding sector to hear their perspective, see the trends they are experiencing in practice and listen to the examples they can provide. Staff who work in this sector do brilliant work in trying to keep our children safe and I have no doubt would have found their duties very difficult given their reduced contact and engagement with children and young people and their families, a bedrock of their work.

V.   IMPACT OF THE PANDEMIC ON CHILDREN'S ONLINE LIVES

119. I now switch my focus to questions posed in a second Rule 9 request (NICCY-M8-002) that focuses on the impact of the pandemic on the online lives of children.

Roles and responsibilities of NICCY

120. NICCY has long expressed concern about children and young people's digital rights and the importance of aligning offline and online safeguarding laws and protections. As a society we have reached a point where governments, civil society, parents and carers, as well as regulators, are all demanding a better deal for children and young people online. To achieve this, children and young need to be recognised in the digital environment as autonomous human rights holders with agency and evolving capacities, having their own distinct rights, views and interests that may be different to those of adults. In my view we will not shape the online world children and young

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people want and deserve without appreciating this and without involving them. Furthermore, the ambition of the OSA and the associated Children's Codes will not be achieved without their full participation.

121. NICCY continues to advocate for stronger regulation and effective policy to safeguard children online, calling for online platforms and tech companies to take greater responsibility in designing safer digital spaces and implementing stronger protective measures. Technology takes a central role in modern society and children and young people are growing up in a world in which the lines between their online and offline worlds are increasingly blurred. The issue of safeguarding children and young people online has been developing over a long period of time and the following paragraphs set out some of the local and international developments in the field and some of NICCY's work in the field.

122. In March 2016, the Department of Health issued an update to their policy "Co-operating to Safeguard Children and Young People in Northern Ireland". It was last updated in October 2024 and it provides the overarching policy framework for safeguarding children and young people in the statutory, private, independent, community, voluntary and faith sectors. It outlines how communities, organisations and individuals must work both individually and in partnership to ensure children and young people are safeguarded as effectively as possible [exhibit CQ/21 - INQ000651894]. Sections on Sexual Exploitation, including online sexual exploitation (7.2.7), Abusive Images (7.2.8), and Risks of Misuse of Digital Technologies (7.2.9) highlight the online risks and harms that are faced by children on a daily basis. It speaks of encouraging responsible online lives, the provision of education and guidance and the roles schools or colleges and parents or carers have. It states at p.58 that:

> "Organisations which engage with children and young people using e-technology should have a specific e-safety policy in place which has been made available to parents and young people. This should outline how the organisation mitigates against risk of harm and help ensure as far as possible that children and young people engaging with the organisation online are kept safe when doing so."

123. The importance that governments and international organisations place on the digital world and any potential harms arising from it can be seen by the Council of Europe's June 2018 "Guidelines to respect, protect and fulfil the rights of the child in the digital

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environment". (Recommendation CM/Rec(2018)7 of the Committee of Minister) [exhibit CQ/22 - INQ000648138]. In its foreword, the Council stated it published the guidelines to "*protect children in the digital environment, to empower them and to protect them from the violence they may be subject to in all settings*". It was recognised that whilst the digital environment creates opportunities, it also creates risks to the welfare of children and young people and to their enjoyment of human rights. The Council invited governments to review their legislation and policies to ensure they adequately address the full range of child rights.

124. In June 2018, NICCY published it's first "*Statement of Children's Rights in Northern Ireland*". It highlighted the importance of the digital world in relation to children and young people's safety and wellbeing and recommended that: "*Work on the urgent implementation of the draft e-Safety Strategy and Action Plan for children and young people in Northern Ireland must be taken forward without delay. A comprehensive overarching policy on cyberbullying should also be progressed as a matter of priority in order to keep children safe from harm*" [exhibit CQ/23 - INQ000648139].

125. In 2019, the European Network of Ombudspersons for Children ("ENOC") developed its annual statement and recommendations on the theme of children's rights in the digital environment. NICCY led this work on behalf of ENOC, including hosting ENOC's 23rd General Assembly in Belfast. The Statement provides a comprehensive set of recommendations to be taken forward by government, regulators and statutory agencies as well as industry and technology companies. It also sets out a wide range of measures to progress the rights of children and young people to, for instance, non-discrimination, participation and education and protection from harmful content [exhibit CQ/24 - INQ000648140].

126. By November 2020, an Online Safety Strategy had yet to be put in place in Northern Ireland and NICCY expressed its view in our Statement on Children Rights in Northern Ireland 2: "*It is deeply disappointing that in 2020 Northern Ireland remains without an Online Safety Strategy, particularly given that work began on this a number of years ago*" [exhibit CQ/25 - INQ000648141]. Children and young people's online and offline lives are intrinsically and deeply interconnected and the digital world is a critical vehicle through which their rights can and should be realised. This includes, for example, rights to information and freedom of expression and association, rights to privacy and to family life, education and health as well as rights to protection from harm, bullying, violence, abuse and exploitation. In order to promote and safeguard

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children's rights in the digital world NICCY made the call for the NI government to: *"Ensure that Northern Ireland has a robust strategy to protect children's rights in the digital environment in place and urgently deliver a child rights based online safety strategy as part of this."*

127. In December 2020, the Northern Ireland Executive finally approved the Children and Young People's Strategy 2020-2030, a strategy statutorily required under section 3 of the Children's Services Co-operation Act (Northern Ireland) 2015 [exhibit CQ/26 - INQ000582983]. Online lives are discussed under the heading "Children and young people live in safety and stability". At paragraph 6.74, the issue of cyber bullying is highlighted *"with young people suggesting that many adults were unaware of and had little understanding of the problem"*. In addition, paragraph 6.75 recognises that *"Pressures created and exacerbated by the Covid-19 pandemic have created challenges for families and placed some children and young people at greater risk of harm"*. This can be due to factors including increased financial pressures, isolation, parental conflict and domestic abuse. It goes on to state: *"With more time spent online, children and young people are also at greater risk of online harm"*.

128. The Strategy identifies three areas requiring the greatest attention, with *"Online safety"* being one of them. The Strategy outlines that it wants children and young people to be able to make the best use of the benefits of the online world whilst staying safe from harm. This means safeguarding them in the online world and tackling all types of online abuse. In particular, paragraph 6.79 states: *"We recognise that children and young people can face different online risks to their peers, and these risks change constantly depending on their age and circumstances and that some groups of children and young people, such as those with learning disabilities, are particularly vulnerable in respect of online safety"*. The Executive pledged to work together to support children to develop the skills to stay safe online and further to progress an Online Safety Strategy for keeping children and young people safe online.

129. In February 2021 the Department of Health published the Online Safety Strategy and Action Plan 2020-2025 [exhibit CQ/27 - INQ000642850]. The Strategy makes clear that keeping children and young people safe online requires a joint effort involving parents and carers, schools, colleges and youth services, internet and technology providers and Government Departments and their arms-length bodies. The objective of the Strategy is to support the development and implementation of a comprehensive

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action plan to improve online safety. NICCY had been pushing for the publication of such a strategy for some time and welcomed the publication.

130. Turning internationally again, the United Nations Convention on the Rights of the Child ("UNCRC") is a fundamental document that outlines the rights of children in various aspects of their lives. The UNCRC is one of the nine core United Nations human rights treaties and sets out the civil, political, economic, social, health and cultural rights of children. Article 43 of the UNCRC provides for the establishment of an independent Committee on the Rights of the Child ("UN Committee") to examine and monitor the progress made by State Parties in achieving the realisation of the obligations laid down by the UNCRC. The UN Committee is comprised of independent experts nominated by those countries that have ratified the UNCRC.

131. The UN Committee, responsible for monitoring the implementation of the UNCRC, publishes interpretational materials called General Comments. In 2021, the Committee adopted General Comment No. 25 ("GC25") on children's rights in relation to the digital environment [exhibit CQ/28 - INQ000648144]. General Comments increase understanding of particular provisions of the UNCRC and its Optional Protocols, helping State parties fulfil their related obligations. GC25 makes explicit for the first time that all children's rights apply in the digital world. Those States who are signatories to the UNCRC will now have to report formally on GC25's provisions. It holds that:

> *"The rights of every child must be respected, protected and fulfilled in the digital environment. Innovations in digital technologies affect children's lives and their rights in ways that are wide-ranging and interdependent, even where children do not themselves access the Internet. Meaningful access to digital technologies can support children to realise the full range of their civil, political, cultural, economic and social rights. However, if digital inclusion is not achieved, existing inequalities are likely to increase, and new ones may arise."*

132. GC25 reiterates that the four general principles of the UNCRC provide a lens through which the implementation of all other rights under the UNCRC should be viewed. They should also serve as a guide for determining the measures needed to guarantee the realisation of the rights of children and young people in relation to the digital environment.

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133. Paragraph 23 of GC25 is clear that governments should review, adopt and update national legislation in line with international human rights standards, to ensure that the digital environment is compatible with the rights set out in the UNCRC. Legislation should remain relevant, in the context of technological advances and emerging practices. Governments should mandate the use of Child Rights Impact Assessments ("CRIAs") to embed children's rights into legislation, budgetary allocations and other administrative decisions relating to the digital environment and promote their use among public bodies and businesses relating to the digital environment.

134. To continue with the UN framework, it is worthwhile mentioning the Concluding Observations of the UN Committee on the 6th and 7th periodic reports of the UK that were published on 22nd June 2023. Periodic reports allow a country to report on the progress they have achieved in meeting the obligations under the UNCRC and the Concluding Observations contains the UN Committee's assessment of how that state has met those obligations. It provides an authoritative overview of the state of human rights in a country. These Concluding Observations of 2023 are the most recent for the UK. At paragraph 29(b), the Committee asked the UK to: "*Adopt the Online Safety Bill and ensure that all laws and policies on the digital environment protect the rights, privacy and safety of children in the digital environment and protect them from harmful content and online risks*". It also states, at paragraph 55(c)(ii), that the government needs to "*Ensure that internet service providers control, block and promptly remove online sexual abuse material of children*" [exhibit CQ/29 - INQ000648145].

135. The introduction of the OSA in 2023 is greatly welcomed and I look forward to it being implemented and utilised in full and its effectiveness being carefully monitored. The intention of this important piece of legislation is not only to protect children and young people from illegal content but to also protect them from legal content that could cause harm or trauma, including the promotion of self-harming. I expand on the work my office carried out in terms of the OSA in more detail below and it is a very important tool that can and must be used to assist in regulating the online world. However, I believe that it is incumbent upon all authorities and those working with children and young people to take steps to safeguard their safety. We all have a duty to talk honestly to children about what it is they are doing online, which platforms they are using, and who it is they are talking to. We need to be having conversations with children and young people about their understanding of new and emerging technologies and social media platforms. We cannot leave them exposed to negative influences online simply because we do not know which online spaces they frequent.

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It is only by actively caring about online lives of children and young people that we can help them use the internet in a safe and positive manner.

136. The growing importance placed on online safety and the online lives of children and young people was reflected in NICCY's 2023-2027 Corporate Plan [exhibit CQ/30 - INQ000648147]. When discussing the wider context for the Plan, the technological context comments: *"Given the fast-changing developments and innovation in technology, there is a need for effective and appropriate regulation and oversight to protect children and young people. Children and Young People spend increasing time in the online world. While digital technological advances are welcome where they are of benefit, we must remain vigilant of the potential dangers particularly of artificial intelligence (AI)"*. A focus area for NICCY included strengthening safeguarding provisions and that includes safeguarding online. This focus filters down to our business plan and we have established a NICCY Youth Panel ("NYP") subgroup to help the organisational response to Ofcom's work around the OSA. This NYP subgroup has undertaken a range of actions to support our work on online harms and is central to all of our work at NICCY as we are strong advocates for child and youth participation.

137. In June 2024, they met with Ofcom's Online Safety Policy Director. This was part of their preparation for contributing to NICCY's consultation response in relation to the Children's Codes (see paragraph 150). For that response, the NYP provided heavy input and shaped much of NICCY's consultation and subsequent recommendations. In February 2025, a member of the NYP presented alongside me at a Victim Support Northern Ireland Conference. The conference's theme was "Protecting Young People Online" and was attended by the Minister for Justice. The NYP member highlighted the lack of education regarding online safety, for both children and their parents. She spoke of the balancing act between UNCRC Article 13 rights in terms of freedom of expression and Article 16, the right to privacy. *"There are so many benefits to being online but it needs to be a safer place"* she said. She concluded by raising the concerns young people have around AI given the speed of its development.

138. The NYP also contributed to NICCY's recent consultation response on a safer online life for women and girls. We sent a survey out to members of our NYP and our Youth Engagement Forum ("YEF") with 14 young people responding. The replies informed NICCY's consultation response that was lodged in June 2025. It is NICCY's ongoing intention that our young people from the NYP and YEF will be able to regularly

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feedback their perspectives on the successes or otherwise of the rollout of the OSA, which will inform our engagement with Ofcom in terms of how the new regulatory regime is operating.

Harms

139. Whilst NICCY has not carried out any detailed research or reports that deal with how much time children spend online, what activities they carry out and their exposure to harms, I can point the Inquiry to a September 2023 report entitled *"Growing Up Online: Children's Online Activities, Harm and Safety in Northern Ireland"*. The report examines what children and young people enjoy doing online, what dangers they encounter, and what training and support they receive. The report was commissioned to inform the delivery of the Executive's five-year *'Keeping Children and Young People Safe: An Online Safety Strategy'*. It was funded by the Safeguarding Board for Northern Ireland and published by Stranmillis University College, Belfast in September 2023 [exhibit CQ/31 - INQ000544915]. It aimed to address the emergence and impact of online risks of harm and trends and to review online safety provision including educational initiatives to safeguard and protect children online.

140. Key messages from the research for that report include:

    a. Children and young people in Northern Ireland reported a wide range of positive online experiences.

    b. They are spending many hours online each day, on school days but especially at weekends and during holidays. The researchers recommended and endorsed the "precautionary approach" proposed by the UK Chief Medical Officers [exhibit CQ/32 - INQ000606830], noting their concern that excessive screen time can displace health-promoting activities by children such as physical activity, healthy diet, regular sleep and quality time spent with families.

    c. The study found a disparity between children and young people's often low perceptions of their parents' level of interest in what they were doing online, and the genuine fears and concerns expressed by the primary and post-primary parents who volunteered for the focus groups.

    d. The study found clear evidence that around one in five children and young people (20 percent of 8–13-year-olds and 18 percent of 14-18 year olds) have

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experienced something nasty or unpleasant happening to them online over the past couple of months, most commonly on social media apps and that girls are much more likely to experience something nasty or unpleasant online. Ofcom's Online Experience Tracker shows that six in ten (59 percent) teenage children aged 13-17 reported encountering potentially harmful content online over a four-week period.

e. The report concludes that a currently underexploited opportunity is offered by Relationships and Sexuality Education ("RSE") in the curriculum which has the potential to address healthy relationships offline and online. It is recommended that content relating to healthy online relationships should become mandatory, not least given the growing prevalence as evidenced in the report of toxic masculinity and online pornography, and the negative impact this is having on boys' attitudes, language and behaviour towards girls. The findings from this research also informed and supported the development of Executive's *Ending Violence Against Women and Girls Strategic Framework*' and *'Delivery Plan*' published in September 2024, which specifically address healthy, respectful relationships and the development of policies, procedures, and tools that help women and girls be safe online [exhibits CQ/32a – INQ000651895 and CQ/32b – INQ000651896 for the Framework and the Plan respectively].

f. While there were high levels of confidence in keeping themselves safe online among more than three-quarters of the children and young people, there is evidently a strong need to provide relevant, up-to-date, age-appropriate, supportive and engaging training and resources for children and young people, but also for parents and teachers/educators. The research highlighted the benefits of children receiving online training, revealing that children who had been trained were less likely to report recent negative online experiences happening to them than those children and young people who had not received any training. The report recommended the development of a centrally, managed resource hub where children and young people, parents and teachers could easily find resources and training designed specifically for them. Since the study has been published, this hub has been created and is now available on the Safeguarding Board for Northern Ireland's website.

g. Finally, the report recommended greater regulation of social media companies by government to help ensure: closer monitoring of online material that is potentially offensive or harmful to children and young people; more transparent, consistent and child-friendly online reporting mechanisms; the

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timely removal of offensive material; and stricter enforcement of age restrictions on certain apps or sites, where currently it is much too easy for children to enter a false date of birth. The OSA and the Children's Codes are intended to tackle these issues.

141. The *"Growing Up Online"* research follows the lead of GC25 in stating that digital rights are not limited to the right to freedom of expression (UNCRC Article 13), freedom of association (UNCRC Article 15), the right to privacy (UNCRC Article 16) and the right of protection from violence and abuse (UNCRC Article 19), which are the rights most associated with the online lives of children. However, the 6,481 children and young people who participated in this research also spoke about the importance of the online world in relation to their right to play (UNCRC Article 31), to health and health services (UNCRC Article 24), right to education (UNCRC Article 28) and to freedom of thought, belief and religion (UNCRC Article 14). The centrality of the online world for children and young people is summed up by the authors:

> *"Children and young people report a wide range of positive online experience and that being online is not a bolt-on to their lives; it is absolutely integral to how they live almost every aspect of their lives today."*

142. The NYP has identified several specific online risks as most harmful to children and young people post-pandemic:

- **Sexual risks and exploitation**: Increased exposure to sexual content, requests for nude images, and being sent inappropriate photos have all increased, with girls particularly at risk. Risks included being pressured to engage in risky behaviour or interact with strangers, sometimes leading to grooming or exploitation. These risks were exacerbated by increased time spent online during and after the pandemic, and disproportionately affected vulnerable groups, including girls and those with pre-existing mental health conditions.
- **Algorithms**: Teenagers regularly inform us they receive suggested content based on their gender and age. Young women are frequently targeted with content on appearance and conformity, whereas young men are finding increasing content from a misogynistic angle on issues.

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- **Adults lacking skill and literacy**: Young people are much more advanced in navigating the online world. They have grown up using online technology and for many it has always been a regular part of their world. They informed us that it is not enough to try and prevent them from accessing harmful material, as this will just make it more hidden. They need the skills to navigate their online lives safely and parents and carers need the language and skills to talk to their children about what they are experiencing online.
- **Cyberbullying**: A significant number of children reported experiencing unpleasant or nasty interactions online, often on social media apps.
- **Exposure to harmful content**: This includes violent content, self-harm, eating disorder promotion, and pornography. Girls were notably more likely to encounter self-harm and eating disorder content.
- **Emotional and psychological impacts**: Repeated or cumulative exposure to harmful content led to anxiety, low self-esteem, body image issues, and in severe cases, self-harm or disordered eating.

Main impacts

143. As discussed previously, NICCY conducted surveys with children and young people as part of the research undertaken for our 2021 report, *"A New and Better Normal: Children and young People's Experiences of Covid 19"*. Many children and young people who responded to the Kids Life and Times Survey (primary 7 aged children) and Young Life and Times Survey (16-year-olds) talked about how important sports, social and cultural activities were for them, to keep fit, to spend time with friends, and to deal with the stresses of life. Furthermore, the restrictions on sporting activities had impacted on the physical health of many young people. Several talked about the impact of the pandemic restrictions on their body image, with some putting on weight due to a lack of activity, others having developed eating disorders. The children placed some of the blame for the latter down to the greater influence of "influencers" online and this was no doubt magnified given the increased time they were spending online due to the suspension of normal recreational activities; closure of school and other restrictions placed upon them due to the pandemic.

144. One harm that manifested itself in a unique manner in Northern Ireland during the pandemic was that of coercive and controlling behaviour. NICCY discuss in Chapter 9 of *'A New and Better Normal'* the riots that took place in March and April 2021 and

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the child exploitation involved. The misplaced actions of these children and young people were a direct result of criminal exploitation, where criminals were controlling or coercing young people to deal drugs and to take part in criminal activities including rioting in the streets. Inevitably, these serious criminal actions have consequences and arrests and convictions followed. I would argue that one aspect of the riots placed the spectre of online harms front and centre - there was a huge amount of social media activity around the riots, or social media "hype" as one local community worker put it. It also was an activity that obtained the approval of their peers or adults within their communities. Reports and media coverage across the civil unrest emphasised that children as young as 12 and 13 have been encouraged to engage in violence against the PSNI by adults and subsequently congratulated; this is a tragic reflection of the social, political and cultural context in which these children are living. Whilst children and young people participating in rioting and being urged to do so by social media content and the encouragement of adults was not unique to the post-lockdown period of 2021, the lockdown nonetheless appears to have been a factor.

145. In terms of harms and social development, a significant number of children and young people who responded to the YLTS expressed concern that the isolation they had experienced has impacted their social skills and they reported feeling very anxious about going out in public and having contact with people outside their households. This caused some of them to increasingly rely on their online use, lives, personas and platforms thus increasing their risk of encountering online harms. Linked to that in terms of safeguarding, I have previously discussed the increased risk that some children and young people faced by virtue of spending more time in unsafe environments, however in relation to online harms specifically, the pandemic also had the effect of exposing many children to new sources of harm. The mass move to the digital world for remote learning, for connection with family and friends and to access information and support, had the unintended consequence of risking greater exposure to inappropriate and harmful content as well as grooming and online abuse. This was recognised at a very early stage of the pandemic by organisations such as the UN who in its 'Policy Brief: The Impact of Covid-19 on children' published on 15th April 2020 specifically warns about online risks to children's safety and the need to take steps to protect them [exhibit CQ/33 - INQ000250256]. However, addressing the immediate threat to physical health posed by the virus was regarded as an imperative and prioritised by the government over the implications of its response to the threat for the online safety of children and young people and resulting harms.

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146. Given the inadequacies of pre-pandemic planning and preparation, it was perhaps inevitable that the focus of the government's response would be on promoting isolation and imposing lockdowns. However, for future pandemics I consider that it will be important, in considering the appropriateness of any response being developed, to assess all the potential harmful impacts especially those that may have far-reaching effects for children and young people as well other vulnerable members of society. As whilst some of those impacts may have been unintended, some of them could have been identified through a more informed and collaborative approach to policy development. Much more is now known by government and it will be difficult to justify any such inadvertent harm caused in response to future crises.

Mitigations

147. In terms of mitigations, the obvious manner in which the government and devolved administrations can influence the prevalence of online harms by legislating against it. The major development in this arena was the introduction of the OSA. It focuses on internet companies that allow users to post their own material online, which includes social media companies, who are now obliged to protect their users and are held responsible for content posted on their sites. As the online safety regulator, Ofcom holds a crucial role in enforcing the new regulatory regime. Part of its role involves engaging in a series of consultations around the OSA and in February 2024, NICCY partnered with the Children's Commissioner of England to respond to the consultation "*Protecting children from harms online*". The response can be found at exhibit CQ/34 - INQ000648151.

148. The Children's Commissioner of England has a statutory role to protect and promote the rights of children in England and for children around the UK on issues reserved for the UK Parliament. Online safety is an issue reserved for the UK Parliament and so the Children's Commissioner for England worked closely with colleagues from devolved nations including NICCY to ensure that the views of children from around the UK were reflected. The method for collaboration on such works is through the British and Irish Network of Ombudsman and Children's Commissioners ("BINOCC").

149. BINOCC has welcomed the comprehensive assessment of the harms and risks from illegal content online in the consultation response. NICCY also considered that the proposed measures for user-to-user and search services would help protect children

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from illegal harms online. NICCY supports whichever option for each proposed measure provides the greatest assessment and mitigation of risk of harm for children and young people. The response outlined that the largest cause for concern is the limiting of measures designed to protect children and young people using certain services, albeit the response acknowledged measures would be supplemented by the yet to be finalised Children's Codes. Finally, BINOCC encouraged Ofcom to focus on incorporating the voice of children and young people in these consultations and engage with them on their experiences of the online world.

150. NICCY provided its own response to a further consultation entitled: *"Protecting children from harms online"* [exhibit CQ/35 - INQ000588895]. It provided Ofcom with a series of recommendations with accompanying explanatory text. I consider that Ofcom's limited focus on children and young people's rights is a missed opportunity to ensure that the Act and Children's Codes are demonstrably compliant with children's rights. My concern included the absence of any CRIAs being undertaken, nor any wider analysis of the impact of the draft Children's Codes on all rights. This was compounded by the lack of any indication that Ofcom, as a public authority, had undertaken an Equalities Impact Assessment ("EQIA") as required by Section 75 of the Northern Ireland Act 1998. EQIAs and CRIAs help bodies identify the impact of proposals on children and young people, and their absence was a matter of serious concern.

151. Whilst NICCY welcomed the inclusion of a section on Human Rights and commentary on the UNCRC and GC25, I was disappointed that the wording of the UNCRC was not directly incorporated into the OSA. The Children's Codes do give *"particular weight to the importance of the best interests of children on deciding our proposals"* (Volume 1, paragraph 2.49), however NICCY urged Ofcom to consider how it might enhance a fuller child's rights approach. Strengthening a rights-based approach would lend itself to the intent of the OSA and the Children's Codes to 'embed safety protections from the outset and ensure that the rights of children and young people are at forefront of design'. NICCY called for such a rights-based approach as a means ensuring that the consideration of "best interests" is not merely tokenistic or seen to be so. Recent research led by Professor Livingstone at the London School of Economic and Political Science, '*The best interests of the child in the digital environment'*, published in March 2024 [exhibit CQ/36 - INQ000648153] states:

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"The 'best interests of the child' implies 'the full and effective enjoyment of rights... and the holistic development of the child' in both the immediate and longer term. However, in relation to the digital environment, there is evidence that 'best interests' is being misunderstood, or even misused or abused. Specifically, in some contexts it is being used as a substitute for the full range of children's rights, which may not be fully substantiated, or to legitimate a 'one-size-fits-all' approach, notwithstanding children's diverse circumstances or to suggest that any single right trumps all their other rights."

152. I share the concern of the researchers over the tendency to use the concept of best interest as a substitute for addressing the full range of children and young people's rights and its implications.

153. Further in relation to the Ofcom consultation response, NICCY recognised the significant body of work that Ofcom carried out with children and parents over the two years prior to the consultation with over 15,000 children and 7,000 parents surveyed. However, NICCY did call for a children and young person's version of the consultation outcome to be published given its length of over 1,200 pages and complexity. NICCY also recommended that Ofcom consult on the strategy it is developing to work with children and young people in monitoring the impact of the OSA and Children's Codes (recommendation no.5). In addition, this recommendation asked for more information to be provided and greater clarity on how the 'participation strategy' will link in with the Executive's Online Safety Strategy. NICCY is willing to be an active part of this participation strategy and both the NYP and YEF aim to provide regular feedback on the effectiveness of the rollout of the OSA.

154. NICCY is firmly of the view that social media companies need to do more when it comes to online safety and harmful content. The "attention economy" has generated huge revenues for social media platforms. Social media platforms Facebook, Instagram, Snapchat, TikTok, X, and YouTube collectively derived nearly $11 billion in advertising revenue from U.S.-based users younger than 18 in 2022. This figure demonstrates that it is not that children and young people have not been at the forefront of the minds of many companies, but rather that they have prioritised profit over rights and harms. A member of NYP stated when contributing to our consultation response: *"Young people are being failed on the internet. It is profits over protection, time and time again. We deserve better."* The Codes and Guidance will need to be updated on a regular basis as technology evolves and changes and new evidence

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emerges of risks to young people. In this regard, NICCY recommended that Ofcom publish its strategy for monitoring the impact of the Codes on children's lives (recommendation no.7).

155. The NYP strongly supported Ofcom's proposal that providers should signpost children to support at key points in the user journey when they encounter suicide, self-harm, eating disorder or bullying content and they welcomed Ofcom's commitment to exploring how this measure could be extended to other kinds of harmful content. The importance of a strong vibrant community and voluntary support infrastructure ensuring that children and young people's digital and online rights are being safeguarded cannot be underestimated, as well as providing more activities in the offline world.

156. While awareness of the OSA is relatively low among children, young people and their parents and carers, once explained, support for its intention is very high. I consider Ofcom missed an opportunity to build the awareness and the trust needed in this consultation by not centring children and young people's rights, as outlined in the UNCRC and GC25, at the heart of these Children's Codes. The long journey of the OSA and the projected timeframes for full implementation does not inspire confidence that the regulatory system will be able to match the speed of the digital world's adaption to change, so that children and young people can be safe when they are online.

157. As to mitigations at a local Northern Ireland level, NICCY has continually advocated in its engagement with government for an adequate response to the dangers of online harms. It responded in November 2024 to the draft PfG that had been issued in September 2024 following the restoration of the government in February 2024 [exhibit CQ/37 - INQ000648154]. Online harms were referenced in several areas. When discussing Ending Violence Against Women and Girls ("EVAWG"), NICCY welcomed this being prioritised by the Executive and urged the Executive to ensure that sufficient resources were put in place to safeguard the rights of children who have experienced gender-based violence, abuse and harm offline and online. I called for recommendations in Stranmillis University's *"Growing Up Online Children's online activities, harm and safety in NI"* to be included in the EVAWG Framework and Delivery Plan. I also called for the Executive to take cognisance of Ofcom's work in preparing for an online safety regime as well as scoping out the value of legislative

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change in Northern Ireland to strengthen the online safety of children and young people.

158. NICCY's response to the PfG included a section on 'keeping children safe', which highlighted that a wide range of UNCRC articles address safeguarding and provide a full and integrated set of rights to protect children from all forms of harm and violence, including online harms, placing a heavy obligation on the government to ensure that children's rights and best interests are fully realised across these areas, including ensuring that children and young people's digital rights are upheld and that they are safe online. NICCY also cautioned the government that the failure to meet that obligation would undermine the vision and goals of its PfG and a range of measures were called for including at p.36: "*The integration and centralisation of the data collected by all agencies should take place to gain a comprehensive, accurate prolife of the problem in Northern Ireland to aid policy and practice developments.*"

159. When the PfG was finalised in March 2025, I expressed my disappointment at the notable lack of emphasis and consideration given to the needs and rights of children and young people. NICCY had strongly advised that a specific outcome area should be dedicated to children and young people, as well as calling for mandatory CRIA's for all legislation and policies. Sadly, these calls were overlooked.

160. In June 2025, NICCY responded to a further Ofcom consultation in relation to a safer life online for women and girls [exhibit CQ/38 - INQ000648155]. This response relied heavily on information from engagement with both the NYP and the YEF, with their perspectives being incorporated into the response. In highlighting that there are many services and situations that impact on children and young people but lack their direct participation, for example facial recognition technology in public places, NICCY reiterated that it is critical that a child's rights approach is front and centre in the design of all digital products and services (recommendation no.1). I considered that the concerns raised by NICCY in response to the Children's Codes consultation on the absence of a Child Rights Impact Assessment and a wider analysis of the impact on all rights were also relevant for this consultation.

161. NICCY welcomed the intent of the guidance to tackle gender-based violence against women and girls agreeing that engagement online can be experienced differently by different genders. The majority of the NYP and YEF members who responded to our survey on this consultation stated that they did not feel the online world is safe for

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women and girls (69.2%). However, in our opinion the focus on the four harms of 'Online misogyny', 'Pile-ons and online harassment', 'Online domestic abuse', and 'Image-based sexual abuse' could have been strengthened by reference to relevant UNCRC articles. This would have indicated to the technology companies that tackling violence against girls online is not optional but part of their legal and corporate responsibilities to children and young people under the UNCRC.

162. In research carried out as part of the Executive's strategy to "*Ending Violence Against Women and Girls*", online misogyny was raised in the focus groups as one of the two most prevalent forms of violence experienced by girls and young women. We agreed with the "End Violence Against Women" campaign when they pointed out in a 25th February 2025 statement that:

> "*... it remains the case that Ofcom is hamstrung by the fact that the proposals are voluntary only, with no actual requirement on tech companies to put in place any of the recommended good practice.*
> *... with a general trend of tech providers delivering the bare minimum when it comes to safety, any next steps from the new government in securing an internet that is safer and freer for women and girls must be to introduce these recommendations into a code of practice. This would give Ofcom the power to insist that measures are introduced, and the ability to enforce against bad actor tech companies who continue to prioritise profits over people*" [exhibit CQ/38a – INQ000651897]

163. For this reason, NICCY recommended that the next version of the Illegal Harms Code and the Children's Code should ensure that there is a stronger approach to protecting girls and boys against misogynism and gender-based violence, informed by the most up to date evidence and abusability studies (recommendation no.4).

164. NICCY welcomed that service providers will be encouraged to follow Ofcom's guidance but remained sceptical that without regulation most providers will be unwilling or financially unable to do more. I look forward to Ofcom's assessment on the quality of that provision and urged Ofcom to ensure that children and young people are involved in that assessment and that the results are communicated clearly and effectively to them. Members of the NYP considered the viability of a "kite marking" system being used similar to the model adopted for food hygiene standards in restaurants. This would clearly communicate the result of Ofcom's assessment in

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relation to how safe the platform or provider has been deemed for women and girls. Whilst the children and young people recognised that this could also become a magnet for bad actors, they felt that on balance this approach could act as a very helpful traffic light system for all children and young people. NICCY therefore recommended that Ofcom consider such a system (recommendation no.3).

165. NICCY concluded by recognising the scale of the challenge facing regulatory authorities but considered that a holistic realisation of children's rights in relation to the digital environment was nonetheless possible. What is required for this to happen is for children and young people's rights to become an overarching objective. Too often the move to mainstream those rights in relation to the online space leads to a focus on individual rights such as privacy, rather than acknowledging that all rights are interconnected.

VI.   POST PANDEMIC BETWEEN 28TH JUNE 2022 TO DATE

166. The pandemic had a profound effect on everyone's lives with children and young people being no exception. In fact, given that the pandemic greatly impacted on key developmental years for many children, it could be argued that the pandemic had a more far-reaching impact on children that it did on most adults. Whilst the online lives of children and young people were growing prior to the pandemic, that growth was turbo charged by the restrictions imposed by the government in its response to the pandemic, which drastically changed large sections of their lives. During lockdown sports stopped as did other outside recreational and social activities. Schooling as they knew it ended. Indeed their outside lives largely came to an end, whilst their online lives became the main way they interacted with their friends, extended family and wider society. Whether through social media channels, instant messaging services or video games, children's online lives increased exponentially and with increased use of the internet, came an increased risk of harm and exploitation. Social media algorithms are designed to target the users with content to keep them online and at times this content can shock, scare, persuade and influence in ways that are not understood by the user. The exposure of children and young people to that kind of targeting and manipulation increased dramatically during the pandemic.

167. The pandemic has had a lasting impact on children and young people's online experiences, which has brought both opportunities and challenges. While technology played a vital role in enabling them to maintain education and their social connections

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during periods of lockdown, it also exposed children to significant risks in an environment that lacked adequate oversight, regulation, or support. Children and young people were pushed online for virtually every aspect of daily life: learning, play, socialising, and even mental health support. For many, screen time rose dramatically and long-term habits around the extent of online usage were developed, as without structured guidance or government policy on how to lead healthy digital lives, families and schools were left to develop their own approaches, often with only limited resources.

168. Reports have linked excessive screen time to growing levels of anxiety, sleep disruption, attention difficulties, and mood disorders in children. Many children and young people now show signs of screen dependency, especially around social media, gaming, and video platforms. With children spending long, often unsupervised hours online, exposure to inappropriate or harmful content increased significantly. During the pandemic, safeguarding organisations recorded a sharp rise in online child sexual exploitation, cyberbullying, and contact with harmful content or misinformation. Children without safe digital spaces at home were particularly vulnerable to grooming, harassment, and online abuse. For others, the online space became a place they were able to find connections that they could not find in the offline world. Marginalised children or those exploring their identity can find spaces online to do so that may not be available offline. There is a paradox in the internet becoming the only space to socialise and connect during the pandemic, as it could be deeply isolating for some and deeply connecting for others.

169. Social media served as an essential connection tool, yet it also intensified issues around body image, self-esteem, and peer comparison. Idealised, filtered content contributed to poor self-image and even impacted eating habits, disproportionately affecting girls and teenagers. Data privacy was also a concern. As schools adopted digital platforms at speed, many children's data was collected by third-party providers without proper consent, oversight, or transparency. In the rush to adapt, insufficient attention was given to whether platforms met appropriate standards for children and young people's rights, privacy, and safety.

170. Given the purposely addictive elements to some of the social media platforms that children and young people enjoy, there is no doubt the increased use of the internet and online lives that was brought on by the pandemic has had a longer lasting impact. It is now normal for children and young people to spend large amounts of time online,

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and this is not limited to older children. Babies and toddlers are growing up in a world in which smart devices are a part of day and daily routines and this is having as yet untold impacts on their development, albeit it is an area of increased study and focus by researchers. This increased use cannot be solely attributed to the pandemic; however, it is my belief that it was fast tracked by the pandemic and it is therefore crucial for a regulatory regime to properly protect children and young people from harms.

171. One recent local example of online harm is worth noting. Alexander McCartney was a prolific child sex abuser based in Northern Ireland. He prayed on his young victims across several jurisdictions with devastating consequences. Grooming victims into believing they were talking online to a girl the same age as them, he asked them to send indecent images or engage in sexual activity online and subsequently blackmailed them for more material in a practice known as catfishing. Tragically one of his 12-year-old victims in the US took her own life after he attempted to coerce her into involving her younger sister. He became the first person in the UK to be sentenced for manslaughter of a victim in a foreign jurisdiction when he received a life sentence in October 2024, with a minimum term of 20 years.

172. It should be borne in mind that a significant majority of Alexander McCartney's victims were questioning their gender and sexuality, so it is important that children and young people who are exploring their identity are not left feeling so alienated that they come to believe the only place where they can find solace and validation is in the online world, thus rendering them vulnerable to the efforts of sexual and other predators to contact them.

173. The OSA has great potential and I welcome Ofcom's consultations with stakeholders, including NICCY, in how the regulatory regime is shaped. As touched on above (paragraphs 147-154), NICCY made several recommendations in terms of the Children's Codes and expressing the overall opinion that a broader child's rights approach is needed. It is telling that in Ofcom's summary of its decisions following the consultation, "Protecting children from harms online" [exhibit CQ/39 - INQ000648156], there is no mention of acting in the best interests of children and young people which should be a central consideration. I believe there needs to be broader consideration of children's rights and how they interact with the OSA and any Codes emanating from it. For example, NICCY advocated in response to the Children's Code consultation for CRIAs to be used by Ofcom and online services and

to ensure they are publicly available, given they are a widely endorsed mechanism for anticipating and subsequently evaluating the likely impacts on children's lives of a particular policy or change. In my view their use would help embed the appropriate a children and young person's rights approach. GC25 states that all rights set out in the UNCRC also apply to the digital world. When children use the internet, social media and other online platforms, their experiences should be valuable, safe and fun. Whilst it is understandable that the regulatory regime should focus on protection and safety, there should be a wider focus to encompass all children's rights.

174. I also believe that better co-operation and co-ordination is crucial. Government and public authorities, agencies and services, parents and children need to be working together to spread awareness of online harms and tackle the problem. If we do not share what we know and what we are doing, do not co-operate with other public authorities and agencies and those in the safeguarding sector, then we might not have a complete picture and may not be able fully provide the protections that children and young people deserve.

VII.   LESSONS LEARNED

175. I strongly believe that we have to stop pushing children and young people into the shadows. If society pushes them into the shadows through judgement and culture wars; if we make them feel ashamed for their uniqueness or fail to provide the support that they need to thrive, then young people might be driven to find connections and comfort solely in the online world. This creates many avenues of potential vulnerabilities. We have to create the space and opportunities for young people to talk about their online lives without judgement, which does include the acceptance that they make mistakes like everyone else. These mistakes can make them vulnerable and we need to ensure there are supports and structures in place in schools, families and communities to help. We must also be able to use and understand the current language and phrases used by children and young people and listen to understand rather than judge.

176. I also strongly believe that the participation of children and young people themselves is crucial for any review on lessons to be learned from the pandemic and beyond in terms of online harms. We cannot assume we are having the right conversations unless we have young people at the table. A powerful recent example of participation is the "*Amplifying Child Safety Online*" project from Children in Northern Ireland and

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NSPCC. Twelve young people aged 13-17 years are being empowered to shape the future of online safety and will give young people "*a voice, audience and influence*" on child safety online. More mechanisms such as this should be created to cater for a wide cross section of our youth, as not just different age groups but different cohorts of our children and young people engage with the online world in different ways.

177. A central tenet of a children's rights framework, the concept of "evolving capacities" is consistent with a long history of social science research showing that children's lives are highly diverse, resulting in intersectional needs. Child development is rarely smooth or harmonious but, rather, jagged, complex and contextually variable. A 15-year-old gamer has a different experience online than an 8-year-old child with additional needs. All sections of our broad child and young person community need to be consulted on their online safety, made aware of the pitfalls of online living and feed into how best to tackle online harms.

178. Schools play a key role in educating our children about the potential harms they can be exposed to online. It is crucial to recognise the importance of effective RSE in supporting children to grow up well online. RSE equips children with the knowledge and skills to develop healthy relationships, understand consent, and navigate complex issues such as online grooming and exploitation. By providing comprehensive RSE, we empower children to make informed decisions and protect themselves in the online world. It is also crucial that pupils are consulted sufficiently over the content, relevance and delivery of the preventative curriculum. Consult children on the topics they would like to discuss and hear what their most pressing concerns are in an ever-changing online world. In order to have the knowledge and skills they need to navigate the world they live in; children want RSE to be reinforced consistently throughout the curriculum and delivered within a school setting that displays a culture based on respect and personal responsibility.

179. In terms of what could be done differently in any future pandemic, I have spoken previously about the importance of taking a child rights approach to decision making, to include the use of CRIAs. Decisions around public health were being made without adequate consideration of child rights and the use of CRIAs would have given the rights of children and young people a more prominent role in these life changing decisions. CRIAs would aid the consideration of both short- and long-term consequences of emergency policies for children. Another way a children and young

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person's rights approach could be incorporated would be to embed the UNCRC in emergency planning to ensure the plan is rights compliant.

180. I believe the future emergency plans must recognise youth mental health services as essential and fund them accordingly. Such services are necessary in ordinary time and even more so in public health emergencies. Part of the suite of mental health supports should include an expanded peer-based support system, as well as increased community supports. Given virtual meetings and appointments have been road tested during the pandemic, such provision should be quick and widespread in any future pandemics. I have outlined previously the increase in risk associated with the loss of a trusted adult for many vulnerable children and young people, be that a teacher or sports coach, so as far as possible access should be maintained with those trusted adults, many of whom are trained in safeguarding and can spot signs of risk or abuse.

181. Access to information and vaccines is another area that can be vastly improved upon in further emergencies. Many children and young people felt poorly informed on a range of issues to include Covid-19 safety, vaccine access, and public health measures. Communication from government and health authorities was often adult-oriented, inconsistent, or overly complex. Many children and young people were left to interpret scientific updates through social media or hearsay. They wanted information they could trust but often had to figure it out for themselves. Many professionals working directly with children and young people, such as teachers, social workers and early years practitioners, faced a lack of clear, timely guidance from government and relevant authorities. This absence of direction made it difficult to deliver safe, consistent care and support. If the adults who support children and young people are themselves uninformed, it seriously undermines the rights of children and young people to information. I believe that in a crisis, clear and coordinated communication from authorities is not optional but rather a fundamental requirement to uphold children's rights and well-being.

182. On vaccination, while uptake among young people was high in many areas, misinformation spread rapidly, and access for some groups, such as children with disabilities or those in rural areas, was poorly planned. To overcome these challenges, authorities should ensure that public health messages are child-friendly, age-appropriate, and crucially co-designed with the participation of young people. They should work closely with youth organisations to deliver trusted information and

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provide targeted outreach on vaccines to hard-to-reach groups. Communication with young people must be honest, transparent, and respectful.

183. The pandemic placed significant expectations on children and young people, asking them to sacrifice schooling, friendships, milestones, and mental health for the common good. But this sense of collective effort was undermined by blatant government hypocrisy that unfolded both during and after the lockdowns. The loss of trust in government is immeasurable. Revelations about events such as the Downing Street parties, while some children missed funerals, sat exams alone, or were fined for socialising, profoundly damaged young people's trust in authority. This breach of public trust cannot be underestimated, nor should its potentially devastating consequences for future emergencies be overlooked. If a similar emergency arises in future, many young people may question why they should comply with guidance that leaders themselves have ignored in the past. To rebuild and maintain trust, governments and officials must lead by example in how they adhere to the rules that they impose. Officials must also be held accountable when rules are broken to illustrate that no one is above the law.

184. In education, we know school closures had a far-reaching impact beyond academic learning, with school being was a source of routine, friendships, meals, safety, and support. Children and young people with special educational needs were especially disadvantaged, losing access to tailored support, therapies, and consistent care provided in their schools. In future, the biggest change that could be made would be to keep schools open as far as is safely possible. When it is impossible to keep school open, it is important to prioritise educational continuity in all emergency plans, especially for vulnerable pupils. One aspect of this is investing in long-term digital inclusion to ensure no child or young person is left behind due to lack of device or access to the internet.

185. A consistent theme across much of the research was the sense that children and young people were spoken about but not spoken to. Despite showing creativity, resilience, and a willingness to help, their ideas were largely ignored in government planning. Going forward, all future emergency planning must include structured, meaningful and regular participation with children and young people. Organisations in the children rights sector should also be involved, to ensure that as broad a cross section of the youth as possible is included. Youth-led organisations and charities must be funded to represent and support their peers in such engagement. Once

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consulted, children and young people should be informed about how their input was used so as to promote feelings of inclusion and impact.

186. As discussed above, the pandemic had particularly harmful effects on children and young people already at risk, including those in care, in unsafe homes, or with additional needs. Those who most needed stability and support were often the most isolated and at risk of harm. We must treat safeguarding and social work as essential services in any future emergency. As far as possible we should maintain regular, in-person contact with vulnerable children and young people, ensuring it is safe to do so for both them and staff. We should resource multidisciplinary teams to provide wraparound support even during lockdowns.

187. In summary, I firmly believe that we must centre children's rights in all future emergency planning. We should prioritise mental health, education, and child protection and view them for what they are - essential services. The participation of children is, and should always be, a crucial aspect in planning and preparation and no future public health emergency should ignore their powerful voices. My position is always to actively involve children and young people in decisions about their lives, and there has been nothing that has had as much of an impact on their lives as the pandemic. Let us learn the lessons from this pandemic and ensure that the impact of future events is minimised as far as possible.

VIII.   CONCLUSION

188. The world that our children and young people are growing up in is one in which the lines between the online and offline worlds are increasingly blurred. The digital world is a one of opportunity whilst at the same time being fraught with danger. NICCY agrees with the principle of proportionality in that Ofcom must have regard to the need for a higher level of protection for children than for adults, while ensuring children retain the benefits of being online. It is clear that children and young people are disproportionately affected by the risks of the digital world, given both their developmental vulnerabilities and their status as 'early adopters' of emerging technologies.

189. As a society we need to ensure that the regulatory framework is both sufficiently robust and sufficiently nimble to keep pace with innovation in the digital space. There is an urgent need for technology platforms to overhaul their policies and take concrete

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steps toward ensuring a safer digital life for both girls and boys. This requires a much stronger approach from the government, from Ofcom and from the tech companies.

190. A key theme and recommendation throughout our work in this field has been the call for authorities to adopt a child rights approach. NICCY has previously stated that Ofcom's limited focus on children and young people's rights is a missed opportunity to ensure that the Online Safety Act is demonstrably compliant with children's rights. Steps including the use of CRIAs and ensuring child and youth participation would help achieve this goal.

191. It would have been a perfect example of a "good practice" step for Ofcom to have undertaken a CRIA on any of its consultations or guidance around the Online Safety Act. General Comment No. 25 recommends the following in relation to CRIAs:

> "38. States parties should require the business sector to undertake child rights due diligence, in particular to carry out child rights impact assessments and disclose them to the public, with special consideration given to the differentiated and, at times, severe impacts of the digital environment on children. They should take appropriate steps to prevent, monitor, investigate and punish child rights abuses by businesses."

Undertaking CRIAs helps to adopt a child rights-based approach, something that lends itself to the intent of the Online Safety Act and accompanying guidance: to embed safety protections from the outset and ensure that the rights of children and young people are at forefront of design.

192. In terms of youth participation, it is crucial to get more young people involved in the mission to make online lives safer. Two good examples are NSPCC's "Voice of Online Youth" and NICCY's Youth Panel. The Voice of Online Youth created a Manifesto for Change which outlines how young people can press for action in areas such as online safety, privacy and education and ensure that the voices of young people are heard in protecting and regulating the online world, whilst ensuring that the internet remains an uplifting and positive space. NICCY's Youth Panel has committed to playing their part in creating a standing agenda item at their quarterly meetings to monitor the impact of the Online Safety Act and associated Codes, linking into NI's Online Safety Strategy. Only through the participation of children and young

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people will children and young people get the online world they both want and deserve.

193. Participation is enshrined in international law by virtue of Article 12 of the UNCRC. Article 12(1) sets out a child who is capable of forming views has the right to *"express those views freely in all matters affecting the child, the views of the child to be given due weight in accordance with the age and maturity of the child"*. It is hard to think of a matter affecting more children worldwide than the increasing prevalence of the online world, hence NICCY's repeated calls for child participation to be central in the regulatory regime Ofcom is establishing. And whilst the UNCRC has been ratified by the UK, NICCY calls for the full incorporation of the UNCRC into domestic law as a mechanism to fully realise the rights the rights it provides. NICCY calls on the Executive to follow the successful example set by Scotland and incorporate the UNCRC into domestic legislation. Such a move would strengthen children's rights and illustrate the importance with which child rights are viewed by those in power. It would also ensure the children's rights are placed at the heart of government and properly considered ahead of any decision that effects children and young people.

194. Finally, turning back to the first half of my statement in terms of the impact of the pandemic on children and young people, it is hoped that the Covid-19 pandemic is a once in a lifetime event for children. However, should there be another public health emergency in their lifetimes, it is crucial that the lessons authorities and wider society have learnt via this pandemic are utilised to create a much improved plan and more effective response for future emergencies. Those children most impacted: children with disabilities; children in care; other vulnerable children; deserve a much greater level of consideration and response than the mostly ad hoc response they received to this pandemic. In the understandable focus on saving the lives, sadly some children were sidelined, child health and social care services ceased, respite was suspended, carers and staff reassigned and vulnerable children, many of whom did not have voice, fell between the cracks. Untold damage was done to sections of our child and youth population and future emergencies need to mitigate the serious and long-lasting impacts this devastating pandemic had. Children's needs and rights must never again be an afterthought.

195. Just as the lack of child participation is a feature of the regulatory response to online harms, it was also disappointingly absent during the pandemic. Young people felt they were kept in the dark over many decisions being taken around their lives,

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especially in education. One example is illustrative. Children and young people had asked for direct engagement with the First and Deputy First Minister, who agreed to host a young person focused press conference. This followed the example set in other jurisdictions. Inexcusably, the press conference which was cancelled. Children also asked to engage directly with the Executive's cross party Covid 19 group but were ignored. At a time of such uncertainly for our children and young people, government and agencies need to ensure that the voice of the child is heard.

196. The Inquiry needs to listen to children and young people and experts in the child rights sector to ensure the report and recommendations arising from this Module are both relevant and effective at upholding child rights and mitigating the negative impacts of any future emergencies. I acknowledge the good work that has been carried out by the Inquiry in terms of engaging with children and look forward to receipt of the Children and Young People's Voice Report. Following the publication of the Module Report, the final step in terms of monitoring adherence to the recommendations is arguably the most important and most difficult. My office and I will continue to engage with the government and agencies and, should the Inquiry believe that it would be of assistance, offer any help we can provide for that important monitoring process.

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 in its truth.

PD

…………………………………………… Dated…………7th August 2025……………

Chris Quinn

Northern Ireland Commissioner for Children and Young People
(18th September 2023 - present)