

Written Evidence submitted by The Children's Society (COR0045)

1. Introduction

1.1 The Children's Society is a leading national charity committed to improving the lives of thousands of children and young people every year. We work across the country with some of the most disadvantaged children and young people through our specialist services. We place their voices at the centre of the work that we do.

1.2 The coronavirus pandemic has disrupted the life of every child in the country. It is not only an unprecedented public health emergency, but also a challenge our society and our economy have not seen in peacetime. There is no denying that the Government – and other decision makers at every level – face a colossal challenge.

1.3 The Children's Society are working across civil society to do all we can to support the collective effort to face the Covid-19 crisis, and to ensure the social and economic effects of the coronavirus are not felt in the lives of our children in the years ahead. Our organisation is also taking a leading role in the children's sector in helping to collate evidence from the frontline of children's services as well as with emergency financial support providers. This live evidence base of emerging issues is being fed back to government on a regular basis.

1.4 We welcome the Home Affairs Select Committee inquiry into the Home Office's preparedness for Covid-19. The Children's Society have chosen to respond to this inquiry specifically on the impact of Covid-19 on refugee and migrant children and families and Home Office policy. Our frontline evidence will form the basis of this evidence submission. We have chosen to focus on children in families with no recourse to public funds. Each section contains an overview, evidence from our frontline services or research, followed by policy recommendations.

2. Refuge and migrant children and young people

2.1 In 2019 The Children's Society provided support to 1,496 refugee and migrant children and young people. We work with separated children, as well as children in asylum-seeking families, children in families with no recourse to public funds and vulnerable children and families applying to the EU Settlement Scheme (EUSS). Many of the refugee and migrant children and families we support are at high risk of discrimination, destitution and social isolation, and the national closure of schools due to the COVID-19 crisis is likely to increase the risks these children face during this time.

2.2 We are particularly concerned for those with a precarious immigration status, as well as those who may have leave to remain but are subject to the no recourse to public funds condition (NRPF). We know that because of this exclusion, there is a high risk that many of these children will fall between the cracks, unable to access healthcare or secure housing and be likely to suffer an income shock during this crisis. Due to the long-term disruption that COVID-19 will cause, we know that local authority resources and capacity will be taken up in dealing with the outbreak, civil society work is likely to be disrupted and services such as outreach scaled back. Already vulnerable and isolated families will be pushed further to the brink.

3. Children in families with no recourse to public funds

3.1 Many millions of households across the United Kingdom are being plunged into unexpected financial crisis and will be reliant on the state for financial support throughout this pandemic and its aftermath. The government have announced a generous package of measures to support people and businesses through this crisis, however families with no recourse to public funds remain out of scope for most, if not all, of this state support. This is not right, especially when the government have repeatedly committed to putting their arms around everyone during this crisis.

3.2 No centrally collected data is publicly available on how many individuals and families have NRPF attached to their immigration status. However, given that the government's policy is to apply NRPF conditions to any migrants wishing to enter or remain in the UK, and that these conditions continue for the most part until individuals and families can settle or acquire citizenship, we can assume this is an issue affecting large numbers of migrant families. The Children's Society has previously undertaken extensive work¹ into the effect this has on children, from their development to the increased risks that they face. Our research has found that, between 2013 and 2015, more than 50,000 individuals with dependents were granted leave to remain in the UK along with an NRPF condition, which means they have no access to mainstream welfare support. According to research published by the Mayor of London's office in January 2020, an estimated 215,000 undocumented children are living in the UK² and they will also have no recourse to public funds.

3.3 Thousands of children's access to vital benefits and support through public funds is dictated by their parents' immigration status, even though the children themselves might be British. An audit of families affected by the NRPF condition supported by The Children's Society between 2015 and 2018 found that 68% had a child or multiple children born within the UK. These children have no other home apart from the UK, but they are being denied access to vital support at a time of national crisis. Having NRPF means that affected children and families are prevented from accessing in-work and out-of-work benefits such as child benefit, tax credits, Universal Credit, income-related Employment and Support Allowance, income support, local welfare assistance schemes, housing benefit and social housing. Unless their no recourse to public funds condition is automatically lifted, they will be excluded from the measures so far announced to support other families affected by the CV-19. Although some temporary changes have come about as a result of litigation,³ usually families with NRPF cannot access Free School Meals which can cost families over £400 per year per child.⁴

3.4 Many of these families will be on the 10 year route to settlement in the UK, having to apply for leave to remain every two and a half years which costs thousands of pounds in application fees, just to comply with Home Office regulations and regularise their immigration status. For example, a single mother with two children has to pay £4,479 for her family to get leave to remain for two and a half years. This includes the Immigration Health Surcharge (IHS) which is currently £400 per year per person – a double-tax for families who are already paying taxes and contributions in the UK. The total amount for this same family from October 2019 onwards when the IHS is increased will be £6,889. These charges remain in place at a time of economic volatility where many more families will lose their incomes without a financial safety net to fall back on.

3.5 Families (and or individuals) on the 5-year settlement route also often do not have access to public funds and whilst they can apply to have their NRPF condition lifted from their immigration status⁵, it runs the risk of the Home Office automatically moving the application onto the 10-year

¹ <https://www.childrensociety.org.uk/what-we-do/resources-and-publications/making-life-impossible-how-the-needs-of-destitute-migrant>

² <https://data.london.gov.uk/blog/how-many-undocumented-children-live-in-london/>

³ In response to a letter before action by a family, supported by solicitors at Deighton Pierce Glynn the government has agreed on 6th April 2020 to allow some children who otherwise have no recourse to public funds, to be allowed to receive free school meals during the COVID-19 pandemic including those granted leave under Article 8 ECHR Family/Private Life grounds, Zambrano carers and those supported by local authorities under Section 17 Children Act 1989 provision. While this is a very welcome change that will help protect some very vulnerable children during the pandemic, it is not a long-term policy change. It also doesn't cover other children who have no recourse to public funds, for example those who are undocumented but not receiving local authority support: <https://dpglaw.co.uk/free-school-meals-extended-to-thousands-more-children/>

⁴ <https://www.gov.uk/government/news/free-school-lunch-for-every-child-in-infant-school>

⁵ <https://www.gov.uk/government/publications/application-for-change-of-conditions-of-leave-to-allow-access-to-public-funds-if-your-circumstances-change>

route to settlement, accruing thousands of pounds more in overall application fees. Applicants on the 5-year settlement route are those with 'exceptional talent' such as entrepreneurs and small business owners, these families will also suffer immensely in the economic uncertainty of CV-19. Ordinarily our services would not encounter families on the 5-year route to settlement as they usually do not require access to benefits, this is likely to change in the current national crisis. At a time of national financial insecurity this policy seems particularly punitive.

Emerging issues from our services

3.6 We know from our frontline services and other research⁶ that many of these families are single parent households, primarily from Black, Asian and ethnic minority backgrounds, who will be unable to work following school closures because of childcare responsibilities. According to early research, these same families are likely to be hit the hardest by Coronavirus⁷. The Children's Society's *Helping Further* service in the West Midlands supports families with no recourse to public funds. Many mothers we support are cleaners and care assistants with almost all of them on zero-hour contracts with no work protection rights. They have either lost their jobs or at serious risk of losing them. These families like many others, save what little they earn to pay for their immigration application fees, savings which they are now having to use to survive because they have no recourse to public funds.

3.7 We know from our services there appears to be a disproportionately high number of families whose children have special educational needs and require additional help from supporting agencies, which are all likely to be reducing services during this period. Whilst schools do not ordinarily provide free school meals to families with NRPF they are an invaluable source of support to families, enabling them to access food banks, receive advice and advocacy to access financial support and local authority care, as well as providing free school meals for some children on a discretionary basis and financial support including with clothing and basic provisions. The families we support are becoming further isolated within this crisis as the support they receive from schools has abruptly stopped.

3.8 Other Government departments have recognised the acute vulnerability of families that have no access to public funds. For example after initial litigation by campaigners⁶, the Department of Education has confirmed that children within families with NRPF who have been identified as in need of support by children's services will be eligible for the Free School Meal Voucher Scheme. MHCLG also recently instructed local authorities to urgently house the homeless population during the CV-19 outbreak⁷ which was widely interpreted as including individuals with NRPF.

3.9 Whilst people can apply to have their NRPF condition removed, this process is time consuming, often requires immigration advice and is not permanent, with somebody on the 10 year route having to apply to have this condition lifted multiple times even where there has been no change in their circumstances. The Home Office have re-publicised their changes of condition application which allows applicants to apply to have their NRPF lifted stating they are willing to deal with cases more sympathetically in light of CV-19⁸. However early indications from our services suggest that the Home Office is asking for more evidence than usual, instead of being more lenient. Some of the evidential requirements for a change of condition are physical signatures on documents, obtaining 6 months' worth of banks statements or a written statements from friends if applicants have borrowed money from them – evidence which is very challenging to obtain during this crisis. Our practitioners are also reporting that the Home Office is taking weeks to get back to clients that have put in applications for change of conditions, increasing their financial strain during this period. The change of condition forms often requires expert advice and

⁶ <https://dpglaw.co.uk/free-school-meals-extended-to-thousands-more-children/>

⁷ <https://www.gov.uk/government/publications/letter-from-minister-hall-to-local-authorities>

⁸ <https://www.gov.uk/government/publications/application-for-change-of-conditions-of-leave-to-allow-access-to-public-funds-if-your-circumstances-change>

with services such as our own temporarily closing or having to change how we operate at pace this is unfortunately delaying the application process further, leaving families without support for that much longer.

3.10 Most drop-in advice surgeries and solicitors offices have closed so our practitioners are having to help families complete forms over the phone, which is proving incredibly difficult and time-consuming, for example our practitioners are having to send screenshots to solicitors which is not appropriate on a long-term basis. Many families have visas running out in the next few months, which need to be extended. Whilst we welcome the announcement that the Home Office will extend visas that are due to expire before May, we believe the grace period offered is not long enough as these applications often take months to gather evidence for, evidence which is difficult to obtain during this national lockdown.

3.11 Our practitioners have also expressed their concern that the number of undocumented families could rise as a result of the CV-19 crisis. This is because when applicants are routinely refused fee waivers for their immigration application and appeals cannot be made through the usual channels, the applicants are obliged to pay these fees within 10 working days to avoid being classified as an 'overstayer'. We are finding it's much harder for these families to secure these funds in the current climate when so many are losing their jobs or trying to buy essentials in bulk for their families.

Recommendations

Recommendation 1. The Home Office need to urgently suspend the no recourse to public funds condition, which is causing working families to become destitute. Individuals and families who need support in light of the CV19 crisis – especially urgent access to healthcare or mainstream benefits – should not be forced to jump through bureaucratic hoops to get NRPF conditions lifted.

Recommendation 2. The Home Office should issue guidance to its staff not to apply the NRPF condition to any new grants of leave to remain.

Recommendation 3: The Home Office should ensure that application processes for Change of Conditions reflect their declared leniency policy, rather than being unnecessarily complicated during this time. Evidential requirements should acknowledge the expected difficulties people will face in gathering necessary documents under lockdown.

Recommendation 4: Loss of income and changes in circumstances that are beyond peoples' control mean that many people on the 5-year route to settlement are likely to apply for change of condition. The Home Office should not automatically move these people onto the more punitive 10-year route, given the exceptional circumstances.

Recommendation 5: The Home Office need to acknowledge that many families on the 5 and 10 year settlement routes will be using their savings to survive throughout this national crisis. Suspending immigration fees and Immigration Health Surcharge on the 10-year route to settlement for at least 12 months will allow families to use any savings they have on protecting their children during the CV-19 outbreak, instead of spending it on Home Office application fees

Recommendation 6: The government must automatically extend all leave to remain applications including those on the ten-year route and make this clear in guidance so that those whose leave is expiring during the pandemic are not put at greater risk of losing their jobs and livelihood.

Recommendation 7: The DfE's recent change in FSM provision for those with NRPF is welcome, but eligible families, schools and local authorities need to be aware of this change. The Department for Education should amend their guidance and make clear to all schools and local authorities the additional groups of children with 'no recourse to public funds' that need to be supported.

Recommendation 8: All children in families without recourse to public funds who are living in poverty should have access to Free School Meals, regardless of their immigration status. We recommend that the FSM eligibility for all children is a long-term change.

Recommendation 9: whether the Home Office suspend NRPF condition or not, they need to provide Local authorities with the resources to support migrant families currently with no access to public funds. Local authorities are already taking steps to utilise alternative powers and funding to assist those with no recourse to public funds who require shelter and other forms of support due to the pandemic, but this is causing a significant strain on resources. If local government is expected to provide this essential support, it is crucial that they are provided with the resources required to do so.

Additional evidence on Domestic abuse and risks of harm within the home

Introduction

The Children's Society is a leading national charity committed to improving the lives of thousands of children and young people every year. We work across the country with some of the most disadvantaged children and young people through our specialist services. Our direct work with vulnerable young people supports missing children, children with experiences of sexual exploitation, criminal exploitation, children experiencing violence and abuse, children in or leaving care, refugee, migrant and trafficked children. We place their voices at the centre of the work that we do.

We welcome this call for evidence on the Home Offices preparedness to respond to domestic abuse in light of Covid-19. With people in the UK being told that they have to stay at home and schools being closed for the majority, children and young people will be spending increased time at home. Whilst for most children living in our society home is a safe and happy place, for many of the children and young people we work with this is not the case. We are concerned that with pupils not in school, police forces working at reduced capacity and fewer people going out to work each day, there may be fewer opportunities for people to spot the signs that children and families are experiencing domestic abuse, resulting in a reduced opportunity for support.

Key recommendations:

Recommendation: The Home Office should produce an information guide aimed at children and young people on Covid-19 and domestic abuse. This document should be age appropriate and offer advice and support for children and young people who experience domestic abuse within their home environments as well as for children and young people who experience domestic abuse within their own romantic relationships. Information should be provided on where children can seek help,

Recommendation: The Home Office should carry out a young person friendly awareness raising campaign on domestic abuse and Covid-19, they should make use of channels that many young people visit such as YouTube, Snapchat and Instagram.

Recommendation: A cross departmental working group should be established to tackle the issue of domestic abuse and its impact on children and young people during Covid-19. Information should be shared from all safeguarding agencies with responsibility for children and young people and local safeguarding partnerships should have the opportunity to feed into these meetings with detail on what they are seeing at the local level in relation to domestic abuse, children and young people and Covid-19.

1. The prevalence of these issues since the Government issued 'stay at home' guidance on 23 March.

1.1 Half of all referrals to children's social care involve domestic abuse.⁹ However, we know that there are many children and young people at risk of experiencing domestic abuse in their households, or within their own relationships, at any given time who will remain hidden from statutory agencies.

1.2 With the UK government issuing 'stay at home' guidance on 23 March 2020 the opportunity for children and families at risk of experiencing domestic abuse coming to light and getting much needed support vastly diminished, increasing the risk that young people experiencing domestic abuse will remain out of sight. Social distancing rules complement tactics used by those who seek to coerce and control their partner's movements and what they allow them to do meaning that coercion could increase in the context of Covid-19. Staying at home could mean more time at home with perpetrators of abuse coupled with increased pressures associated with Covid-19, such as job loss and ill-health, which are likely to create more highly pressured home environments.

1.3 It is important to highlight that domestic abuse does not just affect adults - many young people aged 16 or over could be living with partners of similar age or older. We also have concerns about those under 16 years of age who may be in romantic relationships with their peers and in some instances someone older than them. We know that whilst these young people often do not share the same domestic setting at their partners, anecdotal evidence suggests that they may experience coercive and controlling behaviour online from their abusive partners including requests to share intimate images or being under pressure to leave home to meet up. Young people may not be able to seek help from their families or the people they are living with and it is important that they know where they can find help. Professionals who are aware of such relationships must be able to ensure that young people maintain contact with a trusted professional throughout the Covid-19 crisis.

1.4 On April 11th the Home Secretary announced that there had not been a sustained increase in the reports of domestic abuse to the police, yet there had been an increase in those seeking help for domestic abuse with the national domestic abuse helpline experiencing a 120% increase in the number of calls it received over a 24-hour period.¹⁰ There has also been a rise in the number of requests for help being made through web-chats with anecdotal evidence from practitioners suggesting that people are contacting these services with more complex needs than before the Covid-19 crisis emerged. It is vital to recognise that children and young people living in these households are also victims of domestic abuse and steps must be taken to increase the extent to which they are recognised as such, identified and offered support.

1.5 We are concerned that a rise in the number of police reports of domestic abuse has not accompanied the rise in the use of domestic abuse helplines and web-chats and the increased complexity in the nature of the calls. There will be multiple and complex reasons for this but are likely due, in part, to victims having less freedom and opportunity to report instances of domestic abuse to the police in a safe way or, victims with insecure immigration status and with the No Recourse to Public Funds (NRPF) condition applied to them, not trusting the police not to pass on their details to immigration enforcement agencies.

1.6 During the Covid-19 pandemic the police could be a key agency in identifying young victims of domestic abuse. We are concerned that despite the issue of domestic abuse seeing increased attention from both the government and the British media during the Covid-19 crisis the true number of children and young people affected will remain unseen and unsupported.

2. Measures or proposals to help support victims of domestic abuse and child abuse at this time.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/809108/CIN_review_final_analysis_publication.pdf

¹⁰ <https://www.theguardian.com/world/live/2020/apr/11/coronavirus-uk-live-matt-hancock-under-fire-over-ppe-comments-live-updates>

2.1 The Children's Society are deeply disappointed that despite international evidence suggesting that stay at home measures would lead to an increase in domestic abuse,¹¹ the government failed to act in a timely and robust manner to put in place procedures to support victims of domestic abuse - this has and will continue to negatively impact many children and young people living in our society.

Support services for victims and perpetrators of domestic abuse

2.2 A recent report by Action for Children,¹² highlighted the patchy nature of support services available for children affected by domestic abuse with some local authorities not having any available support for children and young people who experience domestic abuse. It is clear that now more than ever there is a need for provision of services for children and young people impacted by domestic abuse across the whole country. The services that we currently rely on for this type of support are vulnerable and with Covid-19 threatening the financial security of local authorities and the third sector it is likely that many local and national domestic abuse support services will suffer.

2.3 It took till April 11th for the Home Secretary to announce £2million to enhance online support services and helplines for domestic abuse. Whilst this funding is welcome we feel it unnecessarily delayed especially given the international evidence on the impact that this would have on children and families. This funding should have been provided at the earliest possible opportunity to enable organisations providing helpline support to prepare appropriately and move more services online.

2.4 Furthermore, the delay in the Chancellors package of support for charities has meant that many small and local charities have had to change the way they work with families affected by domestic abuse. We are concerned that the already patchy offer of support for children and young people affected by domestic abuse will be greatly impacted by the closure of small charities and a change the way that larger charities may have to operate in light of the financial impact of Covid-19. It is vital that when the Domestic Abuse Bill is brought back to parliament it includes a statutory duty on local authorities, with adequate ring-fenced funding, to provide support for children and young people who experience domestic abuse including those young people who experience teenage relationship abuse.

Information for victims and perpetrators of domestic abuse

2.5 We believe that the Home Office failed to produce information for victims and perpetrators of domestic abuse in light of Covid-19 in a timely manner. We know from our direct work with children and young people that many of them are feeling anxious at this time, they tell us that they do not know where to look for trustworthy information on Covid-19 and the impact that it is having on their lives.

2.6 The Children's Society believe that the Home Office should have produced advice and guidance for responders, service providers and children and families affected by domestic abuse during the Covid-19 crisis as soon as stay at home measures were introduced. This guidance should have offered practical advice and support for individuals, including children and young people, experiencing domestic abuse in light of new restrictions placed upon them as part of stay at home rules – this advice should have been made available in a child friendly format and disseminated using child friendly channels.

2.7 We were deeply disappointed that an initial iteration of the Home Office guidance on Covid-19 and domestic abuse made no reference to children and young people as victims of domestic abuse and neither did it provide any signposting support for young people who may have been looking for information on the subject. We have been working closely with the Department and were pleased to see amendments made to the guidance on April 11th.

2.8 However, although we welcome the changes made we feel that further improvements are needed and strongly believe that there is a need for separate and age appropriate guidance for children and young people who experience domestic abuse both within their households and within their own romantic relationships. It is important that any young person guidance includes a section for young people who are

¹¹ <https://www.nytimes.com/2020/04/06/world/coronavirus-domestic-violence.html>

¹² <https://www.actionforchildren.org.uk/media/12382/patchy-piecemeal-and-precarious-support-for-children-affected-by-domestic-abuse.pdf>

worried about friends or family as we know that young people are most likely to confide in other young people when they are worried about something in their lives. Therefore, we believe it is important that the government produces information guide for young people on what to do if they become aware of abuse experienced by their friends at this time where interactions with trusted adults could be significantly limited.

2.9 Child friendly guidance must also offer support for young people who are concerned about their own behaviours and may have or be worried about displaying abusive behaviour in their own relationships or towards their family. The charity Respect, who are the leading organisation offering support to perpetrators of domestic abuse are not able to offer support to young people who may display harmful behaviour in their own relationships – we urge the government to consider this gap in support and provide training for existing domestic abuse helpline staff on how to support young people who have concerns about their own behaviour.

2.10 We have drafted and offered to share young person friendly guidance to the department as well as support with making further changes to the existing guidance. We have been told by the department that separate guidance is being considered. However, we feel that it needs to be produced and published with urgency.

Effective awareness raising

2.11 We believe that a tailored and targeted awareness raising campaign directed at children and young people is vital if this information is to reach those who need it most.

2.12 We were delighted to see the Home Secretary announce public awareness raising campaign on domestic abuse at this time. However, once more we were disappointed that so far the messaging has not been child friendly and nor has it been directed towards channels that young people are often exposed to.

2.13 Communications aimed at children and young people on specific channels such as: YouTube adverts, Instagram adverts, Snapchat, in between children's content on TV and perhaps links to information and help at the bottom of sites such as BBC iPlayer /BBC Three page would all increase the chance of these important messages getting out to those who need to see them.

2.14 There are also opportunities of having information about domestic abuse for young people in public places that they still visit, such as public park noticeboards or at pharmacies, supermarkets and schools.

2.15 The Home Office has previously ran impressive campaigns on teenage relationship abuse, as well as how to spot the signs of an unhealthy relationship, and we would urge them to look at repackaging some of this in order to start getting the message out to young people as soon as possible.

Recommendation: The Domestic Abuse Bill must include a statutory duty on local authorities, with adequate ring-fenced funding, to provide support for children and young people who experience domestic abuse. This duty must cover the delivery of both accommodation-based and community-based services for adult and child victims and survivors.

Recommendation: The Home Office should produce information guide aimed at children and young people on Covid-19 and domestic abuse. This guidance should be age appropriate and offer advice and support for children and young people who experience domestic abuse within their home environments as well as for children and young people who experience domestic abuse within their own romantic relationships.

Recommendation: The Home Office should carry out a young person friendly awareness raising campaign on domestic abuse and Covid-19, they should make use of channels that many young people visit such as YouTube, Snapchat and Instagram.

3. The effectiveness of Government advice, co-ordination and support for responders and service providers.

2.16 There has been a distinct lack of cross departmental working in the response to domestic abuse and Covid-19. The guidance that has been published across departments often lacks clarity, and sufficient detail and they do not reference each other, we are concerned that this is having a direct impact on the response that children and young people who experience domestic abuse are likely to receive from agencies there to protect them.

Children's Social care guidance

2.17 Covid-19 guidance for children's social care services from the Department for Education (DfE),¹³ is patchy and unclear. We are very concerned with the discretionary powers being signalled to local authorities through this guidance. This is leading to local authorities prioritising or de-prioritising areas of support differently due to capacity issues. Through our work with families in London we have seen some local authorities ceasing all face to face contact with young people who live in households with known domestic abuse whereas in others face to face visits are continuing – there must be some consistency here.

2.18 There is also a distinct lack of clarity around what to do when a child or young person goes missing, we know from our direct work with children and young people who go missing from home that domestic abuse between family members and abuse in their own relationships is often a reason behind why they go missing. We believe there is a need for a joint risk assessments between social care and police, and arrangements around provision of RHIs. For example, some young people are telling our practitioners that they usually go missing to grandparents but are now not wanting to put them at risk of infection and so are sleeping rough when they are having a missing episode. Others may be seeking shelter with adults who pose risk. We need to ensure that these young people are jointly assessed for safeguarding purposes and therefore are not seen as breaking the lock down rules by police forces.

Guidance for schools

2.19 The DfE guidance on supporting vulnerable children and young people during the Covid-19 outbreak¹⁴, also lacks the clarity needed to protect children and young people at risk of experiencing domestic abuse.

2.20 We welcome that the Government has said all vulnerable children including those on child in need and child protection plans should be able to attend school. However, we are concerned about the many vulnerable young people, including those experiencing domestic abuse, who may be hidden from view and may not benefit from a social care status that means they can continue to attend school. Some children may face challenges in their home lives, but schools, colleges, and alternative education provision can offer a safe place, supervision, social interaction and support.

2.21 Schools must be given the flexibility to offer places to all children they know to be at risk of domestic abuse. They should be in touch with social care to ensure these children have a trusted professional they can speak to regularly during this time who can check on their well-being and children. There must be robust information sharing between schools, children's social care and the police in order to ensure that all children and young people who are vulnerable due to suspected domestic abuse are offered a place at school, even if they do not fit the DfE definition of vulnerable.

Collage of police guidance

2.22 Guidance issued by the College of Policing¹⁵ gives the police powers to move children and young people if they are out of their houses and taken them home. It also gives them power to issue fines to their parents or carers if their children are not at home. We were pleased to see domestic abuse being included in the police guidance as reasons why an individual could leave their home. However, we are worried that for many children and young people who may not feel comfortable speaking to the police that without

¹³ <https://www.gov.uk/government/publications/coronavirus-covid-19-guidance-for-childrens-social-care-services>

¹⁴ <https://www.gov.uk/government/publications/coronavirus-covid-19-guidance-on-vulnerable-children-and-young-people/coronavirus-covid-19-guidance-on-vulnerable-children-and-young-people>

¹⁵ <https://www.college.police.uk/What-we-do/COVID-19/Pages/COVID-19.aspx>

appropriate training in how to work with young victims of domestic abuse opportunities could be lost to establish why children and young people have gone missing from home.

2.23 We are also concerned that the College of Policing guidance does not cover those young people who may be experiencing abuse within their own relationships. We know that whilst many victims of teenage relationship abuse will not necessarily be self-isolating with their perpetrators, this form of abuse often occurs through technology and many young people will be feeling pressure to break curfew and go and see abusive partners. We are concerned that without sufficient guidance and professional curiosity from the police that these children and young people could be at risk of unnecessary criminalisation and increased stress and anxiety associated with the teenage relationship abuse that they are experiencing.

2.24 We also see a need for domestic abuse guidance to be issued to the police that stresses that first response police officers must always check on the welfare of a child/young person when called out to a domestic abuse incident, we know from our direct work that this does not always routinely happen. We are concerned that the police, who may be the only external adults coming into abusive households, are missing the opportunity to identify children and young people at risk of domestic abuse.

Recommendation: A cross departmental working group should be established to tackle the issue of domestic abuse and its impact on children and young people during Covid-19. Information should be shared from all safeguarding agencies with responsibility for children and young people and local safeguarding partnerships should have the opportunity to feed into these meetings with detail on what they are seeing at the local level in relation to domestic abuse, children and young people and Covid-19.

Recommendation: The Department for Education guidance on supporting vulnerable children and young people during the Covid-19 outbreak must be amended to provide more clarity on how local authorities should be supporting vulnerable children and young people living in their areas. The DFE should also provide opportunities to share good practice they develop in responding to families to enable the development of consistent approaches across the country.

Recommendation: Schools should be given flexibility to offer places to all children they know to be at risk of domestic abuse. Information about these children and young people must be fed back to children's social care and these children and their families should receive a visit and offered support where needed.

Recommendation: College of Policing guidance must be updated to cover instances where young people are victims of domestic abuse within their own relationships and training is needed for all first responders in how to recognise the signs of domestic abuse and how to carry out robust welfare checks both in the home and in the community.

April 2020