



Briefing: Children in the Covid-19 Inquiry Module 2 Report

Module 2: 'Core UK decision-making and political governance'

This briefing summarises the key findings and recommendations relating to children in the Covid-19 Inquiry's Module 2, 2a, 2b, and 2c report published on 20th November 2025.

Module 2, 2a, 2b and 2c examined core political governance and decision-making at UK and devolved levels during the pandemic. The report identifies significant failures to anticipate or mitigate harms to children, inadequate safeguarding considerations, insufficient impact assessments, and weak communication with children and young people. The Inquiry concludes that children bore profound and avoidable indirect harms from pandemic measures.

The report makes 19 recommendations, including a call for legislation to place Child Rights Impact Assessments (CRIAs) on a statutory footing. This represents a major milestone for children's rights in the UK and directly echoes long-standing calls from Just for Kids Law and the Children's Rights Alliance for England (CRAE), the children's sector and the UN Committee on the Rights of the Child.

As a Core Participant to Module 2¹ and Module 8² ('Children and Young People'), Just for Kids Law (including CRAE) has consistently highlighted how children's rights were side-lined during the pandemic with devastating and lasting effects. This recommendation marks a vital recognition of that failure and must be a turning point for how the UK Government approaches decision-making that affects children.

Key findings: How Government decision-making failed children

1. Children's rights and needs were not properly considered or understood

The Inquiry finds serious deficiencies in high-level decision-making, coordination and preparedness, describing a toxic culture at the centre of the UK Government, where destabilising behaviour and poor leadership contributed to chaotic and inconsistent decisions.

Within that environment, decisions affecting children were routinely given limited attention. The Inquiry contrasts the deliberation given to the question of a London lockdown with the comparatively hasty decision on 18 March 2020 to close schools, which was taken with limited evidence that closures would curb the rise of infections.

The report determines that it was foreseeable that lockdown measures, including requirements for people to stay at home, would expose certain groups, including at-risk children, to particular harms. UK Government officials acknowledged that children's needs were ignored. Former Cabinet Minister, Michael Gove, told the Inquiry the UK Government "did not pay enough attention to the impact particularly on children, and vulnerable children."

¹ In partnership with Save the Children UK

² In partnership with Save the Children UK, Centre for Young Lives and Child Poverty Action Group

The Inquiry further concludes that no government in the UK was adequately prepared for the task of educating most children at home, nor for meeting the challenges or risks presented. It finds that no government "entered into a systematic consideration of how the decisions that they took to combat the virus would affect vulnerable sectors of the population."

2. Children faced significant indirect harms from the pandemic response

The Inquiry emphasises that although the vast majority of children were at lower medical risk from Covid-19, they were severely impacted by the policy response. The removal of essential structures, such as schools, from children's lives increased the likelihood that these measures would compound pre-existing inequalities.

The decision to close schools and early years settings "brought ordinary childhood to a halt." The Inquiry emphasises that access to play and social interaction with family and friends are critical to children's development, and that developmental opportunities missed during these months may be difficult, if not impossible, to fully recover. The Inquiry highlights that the indirect harms of such measures should have been considered more systematically in government planning.

This unequal impact was compounded by the decision-making context. The Inquiry attributes a "lack of understanding" at the time about the lives of the most vulnerable to a lack of diversity amongst decision-makers. This "manifested itself in the fact that policy discussions did not always recognise the reality of home life for many", including "those who lived in tower blocks and had no garden, those who could not afford to provide laptops for their children, and those who had to work from home and look after their children in confined spaces."

The Inquiry identifies the UK Government's approach to free school meals and, in particular, the delayed introduction of free school meals to support children during school holidays as a particular "blunder." The Inquiry concludes that given the lack of diversity amongst Ministers, it was "all the more important for there to be proper, centralised oversight within the UK government of the impact that the pandemic was having across society."

3. Pre-existing socio-economic inequalities were reinforced

The Inquiry's evidence makes clear that existing socio-economic inequality was a major driver of vulnerability during the pandemic: "The increased risk of harm was also strongly influenced by socio-economic factors...This often overlapped with other factors such as ethnicity."

Although Section 1 of the Equality Act 2010 creates a duty requiring public bodies to exercise its functions in a way that is designed to reduce inequalities of outcome linked to disadvantage, this duty has not been commenced in England, and there is no equivalent in Northern Ireland.

By contrast, Scotland has implemented the "Fairer Scotland" duty since 2018, and Wales brought the socio-economic duty into force during the pandemic as part of its commitment to creating "a more equal Wales". These differences matter because children's exposure to harm was closely tied to the socio-economic circumstances of their families and communities.

4. Rising risk of abuse during lockdowns

The lack of consideration of children's rights within pandemic decision-making took place in a context where the risks to children were not only severe but also foreseeable. The Inquiry notes that early reports from China and Italy were already showing significant increases in domestic abuse, and a senior policing figure told the Inquiry the risks were "self-evident".

Lockdown created a situation in which abuse within the home was likely to rise, while simultaneously making it harder to detect, according to the Inquiry: "The closure of schools to most children did not just expose them to greater harm within the home but also reduced the role of schools as a vital part of the child protection system. This lack of visibility of children put them at even greater risk." The impact was immediate and stark: from April to September 2020, there was a 31% rise in incidents of death or serious harm to children aged under one year in England as compared with the same period in 2019. The Inquiry also notes the increase in serious harm incidents which involved disabled children, while calls to the National Domestic Abuse Helpline jumped by 120% in a single day.

The report concludes that the "it should not have required the first lockdown to demonstrate that these risks would materialise" but that the "UK Government should have assumed that the implementation of a lockdown would expose significant numbers of women and children to violence and abuse" and taken proactive steps to mitigate harm during lockdown.

5. Children and young people received no targeted public health communication

The Inquiry finds that children were not effectively included in public health communications, noting that while most children were at less risk from the virus, they "suffered immeasurably" as a result of other restrictions, such as school closures. The UK Government and Northern Ireland Executive did not hold any briefings aimed at specifically addressing the concerns of children and young people. Indeed, some ministers in Northern Ireland "expressed misgivings as to the necessity and desirability of separate press conferences for children." In contrast, Scotland and Wales conducted some sessions specifically for young people.

Describing this as "missed opportunities", the Inquiry recommends that future pandemic communication strategies include children and young people to ensure clear, accessible messaging.

6. Child Rights Impact Assessments (CRIAs) could have led to better outcomes

The Inquiry determines that undertaking CRIAs could have guided better outcomes, as demonstrated in Wales and Scotland where certain age-based exemptions were applied. The decision was made in the summer of 2020 in Wales to exempt children aged under 11 years from social distancing requirements, and similarly in Scotland to exempt children aged under 12 years from the 'rule of six'. By contrast, England did not exempt children from the 'rule of six', due to a desire for "clarity and simplicity" in the rules, and no formal assessment was undertaken before schools were closed.

The evidence heard by the Inquiry shows that SAGE, and even some Ministers, were "pushing" to exempt children from the rule of six policy, but that this was declined by the highest levels of government. The Inquiry therefore concludes that: "Had children's rights impact assessments been conducted, they might have focused greater attention on the impacts of decisions on children's interests and on what could be done to mitigate the potential effects of the rule of six on children." It also notes that no CRIA took place in England in relation to the closure of schools "in spite of the enormity of that decision."

During the early days of the pandemic, the Inquiry concedes that "faced with a desperate crisis, many decision-makers might have felt there was insufficient time to conduct formal impact assessments." Nonetheless, "decision-makers could and should have commissioned assessments at an earlier stage or at least as soon as circumstances permitted." This would have helped assess impact and the evaluation of the mitigating actions being taken.

7. Inquiry arrives at important conclusions about the need for, and nature of, impact assessments

In light of all the evidence heard in this Module, the Inquiry reaches an overwhelming conclusion about the value of formal impact assessments in mitigating harm during decision-making. The rationale is such that these assessments permit decision-makers – "particularly in a non-diverse decision-making body" as was the case during the pandemic – to "develop a greater understanding of the needs of others."

While governments should not "need" this process to consider how their decisions will affect the most disadvantaged, those at risk or in need of protection, the formal process of assessment "helps ensure that the most significant risks are identified, taken into account when making important decisions, and afforded appropriate weight, and that mitigation is better planned."

Although statutory equalities duties exist across the four nations, the Inquiry makes clear that these frameworks were not sufficient to ensure meaningful consideration of children's rights during the pandemic. While the UK government is subject to the Public Sector Equality Duty and was legally required to have due regard to certain equality considerations, the equality analysis undertaken in advance of the Coronavirus Act 2020 was "drafted at a high level and did not deal in any detail with the equality implications of, for example, closing schools." Indeed, no detailed impact assessments preceded the major decisions to close schools or impose the first lockdown in any of the four nations, and the then-Prime Minister, Boris Johnson, confirmed that he "was not provided with and did not consider any Equality Impact Assessments" when making fundamental decisions about imposing, easing or making exceptions to interventions.

Impact assessments carried out in Wales two months after the first lockdown is deemed "too late" with the Inquiry concluding that timing matters: "The Inquiry understands the need for speed during the early stages of the pandemic, but as soon as time allows, impact assessments should be carried out." While this may not change the decision, this early analysis "may lead to steps to mitigate the effects of the decision, such as guidance or making exceptions to a policy." The Inquiry points out a key example to demonstrate the importance of impact assessments and their timing, noting that in Wales, their use "led to the decision to include visits to residents of care homes and hospices as a 'reasonable excuse' for gathering indoors."

It is clear the Inquiry believes in the potential of Impact Assessments – specifically CRIAs in relation to children – can shape mitigation, identify disproportionate impacts, and lead to practical steps that reduce harm.

The Inquiry also calls on the UK government and devolved nations to "each agree a framework that identifies people who would be most at risk of becoming infected by and dying from a disease and those who are most likely to be negatively impacted by any steps taken to respond to a future pandemic. The framework should set out th specific steps that could be taken to mitigate the risks to these people."

Key recommendations

The Inquiry made several recommendations that are particularly relevant to children. We call on the UK Government to implement these recommendations at the earliest opportunity.

- Recommendation 6: The UK Government should bring into force in England section 1 of the Equality Act 2010, implementing the socio-economic duty. The Northern Ireland Assembly and Northern Ireland Executive should consider an equivalent provision within section 75 of the Northern Ireland Act 1998.
- **Recommendation 7:** The UK Government should introduce legislation to place child rights impact assessments on a statutory footing in England. The Northern Ireland Executive should consider an equivalent provision.
- Recommendation 8: The UK Government and devolved administrations should each agree a framework that identifies people who would be most at risk of infection and death and those who are most likely to be negatively impacted by steps taken to respond to a future pandemic. The framework should set out how to mitigate the risks to these people.
- Recommendation 14: The UK Government and devolved administrations should each develop action plans for how government communications will be made more accessible during a pandemic

NB. Public hearings for Module 8, which examines a broad range of issues specifically affecting children and young people, were held between September and October 2025, and the Inquiry's report on this module is expected to follow in due course.





This briefing is produced by Just for Kids Law, including the Children's Rights for England. Please contact Mandeer Kataria: mandeerkataria@justforkidslaw.org for more information.