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SOLICITORS

Rt Hon Yvette Cooper - Secretary of State for the Home Department

[redacted]

Our ref: DE/O1544-3 16 June 2025

Your Ref: Z250066

JUDICIAL REVIEW PRE- ACTION PROTOCOL LETTER

Dear Sirs,

Government Response to the Final Report of the Independent Inquiry into Child Sexual Abuse

Please treat this letter as a pre-action letter within the pre-action protocol for judicial review.

The proposed Claimant

The Maggie Oliver Foundation (A Charity)

The proposed Defendant

The Secretary of State for the Home Department.

Reply date

4pm on 30 June 2025.

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References

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Introduction

1. The Proposed Claimant ('Claimant' hereafter) challenges the following decision as contained within the Secretary of State's Tackling Child Sexual Abuse Progress Update, (announced on dated 8 April 2025 and published on 9 April 2025). On 16 January 2025 the Secretary of State for the Home Department made a statement and confirmed that the Government has accepted the 20 recommendations of the Independent Inquiry into Child Sexual Abuse ('IICSA') in full.

2. Furthermore, during recent PMQs in the House of Commons, the Prime Minister made the following statement: *'I strongly believe that we should implement the recommendations that have already been made. And that is what we are doing.'* (30th April 2025)

3. However in a progress update dated 9 April 2025, the proposed Defendant (''Defendant' hereafter) confirmed that the Secretary of State has agreed to implement Recommendations 4, 5, 9, 10, 11, 13, 14, 15 and 17 (9 of the recommendations) that were made by the Independent Inquiry into Child Sexual Abuse ('IICSA') in its final report. However, the Defendant has rejected recommendations 1, 3, 6, 18 and 19 (5 of the recommendations). The Defendant has failed to reach a decision to implement recommendations 2, 7, 8, 12, 16 and 20 (6 of the recommendations), but instead wishes to subject those matters to further consultation, monitoring, review or other action. The Defendant is not clear in relation to recommendation 5.

4. The Claimant's concern, which is widely shared, is that the failure to implement the 20 recommendations made by the IICSA's in its final report dated October 2022 has placed

children across the UK at heightened risk of Child Sexual Abuse and Child Sexual Exploitation by organised groups of child predators.

5. The Secretary of State will be aware that the Government has recently committed to a full statutory public Inquiry into grooming gangs following the report of Baroness Casey, which is due to be published shortly. For the avoidance of doubt The Maggie Oliver Foundation would strongly oppose any response to this pre-action letter in which the Defendant were to seek to defer implementation of the IICSA recommendations until after the conclusion of the newly announced Inquiry.

6. The concerns expressed by Baroness Casey, and by the Claimant, refer to the continuing failure by successive governments to properly address the prevalence of child sexual abuse and child sexual exploitation in the United Kingdom. The failure to implement the October 2022 recommendations of IICSA is probably the best example of this continuing failure.

The decisions under challenge

7. The Claimant challenges the Defendant's decision of the 8 April 2025.

8. The failure of the Defendant to implement all of the 20 recommendations of the IICSA report, in line with the public statement made on 16 January 2025. (Proposed Ground One) (Grounds 2-5 are pleaded as alternatives to this first Ground).

9. The refusal by the Defendant to implement recommendation 1 of the recommendations made by the Independent Inquiry into Child Sexual Abuse ("IICSA") in its Final Report published on 20 October 2022 (A single set of core data relating to child sexual abuse and child sexual exploitation). (Proposed Ground Two)

10. Subject to confirmation, the decision of the Secretary of State to reject the Inquiry's recommendation to prohibit the use of pain inducing restraint techniques in child detention centres (Recommendation 5). (Proposed Ground Three)

11. The decision of the Secretary of State to reject the Inquiry's recommendation to amend the Children Act 1989 to give parity of legal protection to children in care (Recommendation 6). (Proposed Ground Four)

12. The decision of the Defendant to delay implementation of recommendations 2, 7, 8, 12, 16 and 20, but instead to determine that, notwithstanding assurances that the recommendations would be implemented, any implementation would be contingent on further consultation, monitoring, review or other action. Alternatively, the failure of the Secretary of State to provide a detailed timetable for implementing those recommendations. (Proposed Ground Five)

Previous correspondence

13. The Claimant has engaged with the Secretary of State (through ourselves) in earlier pre-action correspondence:

    a. On 15 January 2025, the Claimant sent a Pre-Action Protocol letter challenging the SSHD's the Defendant's failure to accept and implement the 20 IICSA recommendations;

    b. On 16 January 2025 the Defendant published an Oral statement to Parliament, entitled 'Next steps to tackle child sexual exploitation'. The Oral statement to Parliament included in particular the following relevant statements:

"But despite all those national inquiries, reports and hundreds of recommendations, far too little action has been taken and shamefully little progress has been made. That has to change.
So before Easter, the government will lay out a clear timetable for taking forward the 20 recommendations from the final IICSA [Independent Inquiry into Child Sexual Abuse] report."

"But in order to go much further, I have asked Baroness Louise Casey to oversee a rapid audit of the current scale and nature of gang-based exploitation across the country and to make recommendations on the further work that is needed";

c. On 31 January 2025, the Defendant responded to the Claimant's Pre-action letter referring to the above Oral statement to Parliament of 16 January 2025 and, inviting the Claimant to *"....consider withdrawing their pre-action protocol letter or amending their position."*;

d. On 12 February 2025, the Claimant responded to the Defendant and stated *inter alia*:

Ms Oliver instructs that since 2022 the government has sought to delay implementation of the IICSA recommendations. She views the Secretary of State's statement of 16th January 2025 as yet another delay. There is no reason why the Secretary of State could not have set out a timetable within her statement of 16th January 2025.

In the circumstances, Ms Oliver will not withdraw her pre-action letter but will delay the issue of any application for judicial review until after 20 April 2025 - only because the Secretary of State has provided an assurance that a timetable for implementation of the IICSA recommendations will be published prior to that date.

e. On 8 April 2025 the Parliamentary Under Secretary of State for the Home Department made a statement in the House of Commons and referred to 'a detailed update and timetable for the work that is under way on the IICSA recommendations';

f. On 9 April 2025, the Government published *"Tackling Child Sexual Abuse. Progress Update"*. This update sets out the *"Government action in response to the Independent Inquiry into Child Sexual Abuse (IICSA)*. The Government update sets out the action the Government *"...is taking in response to IICSA's final report"*.

Background

14. The Claimant, The Maggie Oliver Foundation, was founded by Maggie Oliver, who is a retired detective constable of the Greater Manchester Police. Mrs Oliver became a Detective Constable in 2002 and joined the Major Incident Unit of the Serious Crime Team of the Great Manchester Police in 2004.

15. During her time as a Detective Constable, Mrs Oliver was tasked to work first on Operation Augusta (2004-5) and later Operation Span (2010-12), during which investigations she interviewed large numbers of children who had been the subject of sexual abuse and child sexual exploitation.

16. During these operations Mrs Oliver witnessed the repeated failure of Senior Officers to record CSA and CSE allegations, to prosecute serial offenders or to protect the young victims. In order to publicly speak out about the police neglect of child sexual abuse victims, Mrs Oliver was forced to make the difficult decision to resign from the Greater Manchester Police in 2012 so that she would be free to do so.

17. In May 2017, the BBC televised the series Three Girls, on which she worked as The Programme Consultant for 4 years, dramatising the cases in which Mrs Oliver was involved, which put child sexual abuse at the forefront of the national debate. Mrs Oliver founded The Maggie Oliver Foundation for the survivors of abuse in Rochdale, and other victims of child sexual exploitation and abuse. Mrs Oliver was a core participant in the Independent Inquiry into Child Sexual Abuse (IICSA), and provided evidence to the IICSA Child Sexual Abuse by Organised Networks Investigation, which reported in February 2022.

18. Maggie Oliver founded The Maggie Oliver Foundation (TMOF) on 11th September 2019. It is a Charity that supports adult survivors of sexual abuse to transform their Pain into Power throughout the United Kingdom. The Foundation provides legal advocacy and emotional support for survivors of child sexual abuse (CSA) and child sexual exploitation (CSE). The Maggie Oliver Foundation (TMOF) continues to highlight the problem of child sexual abuse and exploitation (CSAE) nationally, and the continuing failures of the authorities to address CSA and CSE effectively. Since 2019 the Foundation has helped more than 4,285 survivors of child sex abuse.

The Independent Inquiry into Child Sexual Abuse (IICSA)

19. On 7 July 2014, the then SSHD, Theresa May MP, announced the establishment of the Inquiry, initially in non-statutory form. On 22 January 2015, the SSHD made a further statement in the House of Commons describing the Inquiry as a *"once-in-a-generation opportunity"* to deliver justice for survivors of child abuse. In her statement, she emphasised the need for the Inquiry to make recommendations that would prevent such abuse from occurring again in future.

20. In February 2015, the Inquiry was reconstituted as a statutory inquiry under the Inquiries Act 2005, enabling it to compel witnesses and request any material necessary to investigate where institutions failed to protect children in their care.

21. The scope of the Inquiry, as set out in its Terms of Reference, was to (emphasis added):

> *" ... consider the extent to which State and non-State institutions have failed in their duty of care to protect children from sexual abuse and exploitation; to consider the extent to which those failings have since been addressed; to identify further action needed to address any failings identified;* ***to consider the steps which it is necessary for State and non-State institutions to take in order to protect children from such abuse in future****; and* ***to publish a report with recommendations****."*

22. The Inquiry's Terms of Reference required it to produce an Interim Report. This was published as the *Interim Report of the Independent Inquiry into Child Sexual Abus*e in April 2018.

23. The Inquiry completed 15 separate investigations, which examined the extent to which institutions took sufficient care to protect children from sexual abuse, and the extent to which the institutions involved knew or should have known about the abuse, and how they responded.

24. The Maggie Oliver Foundation is deeply concerned that, some 2 years and 7 months on, the ICCSA recommendations have not been implemented in full and/or the government has purported to implement recommendations, whereas they have not in fact been implemented.

25. The Maggie Oliver Foundation is also concerned that the failure to implement the recommendations of the IICSA has and continues to put many thousands of children, across the UK, at risk of Child Sexual Abuse and Child Sexual Exploitation.

26. The Claimant's concerns are demonstrably well founded, as in the Government's introduction to its Tackling Child Sexual Abuse - Progress Update, 9 April 2025, it is stated: (emphasis added)

The scale of child sexual abuse is truly staggering. Children make up only 20% of the population but are the victims in 40% of all sexual offences. 7.5% of all adults in England and Wales are estimated to have been sexually abused before the age of 16, according to the Office for National Statistics 'Crime Survey for England and Wales. That equates to 3.1 million adult victims and survivors of child sexual abuse.

The National Crime Agency's National Strategic Assessment of the Child Sexual Abuse Threat in 2025 makes clear that the risk to children from sexual abuse continues to increase, aggravated by evolving online environments and technology adoption. It estimates there are up to 840,000 offenders who pose some degree of sexual risk to children, and there are 400,000 searches for online child sexual abuse material every month in the UK alone.

Over seven years of investigation, the Independent Inquiry into Child Sexual Abuse (IICSA) shone a light on the pain and suffering caused to victims and survivors of child sexual abuse and the failure of institutions to prioritise the protection of children in their care over personal and institutional reputations. In doing so, it drew on the testimony of over 7000 victims and survivors and considered over 2 million pages of evidence across 15 investigations.

IICSA's findings, culminating in the recommendations in Professor Alexis Jay's final report of October 2022, were a package of measures designed to give greater priority and focus, across Government, institutions and society, to protecting children from sexual abuse and to tackling the systemic weaknesses in organisations and practices which have left children vulnerable, exposed them to harm or denied them access to justice and support. Sadly, since IICSA reported, far too little progress has been made to put IICSA's findings and recommendations into action.

This Government is committed to put that right and will do everything in its power to prevent the horrors of child sexual abuse, providing the national and local leadership

required to tackle offending, protect children from harm, and support victims and survivors, ***including setting out in this update our next steps towards acting on IICSA's recommendations.***

At the same time, the Government recognises that child sexual abuse is not a 'historic ' issue, and across the country children continue to be subject to horrific sexual exploitation and abuse which has a devastating impact on their lives. The Centre for Expertise on Child Sexual Abuse estimates that 500,000 children are sexually abused every year – in the family home, in institutions, in our communities and online. IICSA, for good reason, focused on how institutions have failed to protect children from sexual abuse, but our response must go further, addressing all of the spaces in which child sexual abuse is perpetrated.

Child sexual abuse is an evolving threat with ever-more sophisticated modes of offending creating new risks. That threat includes the exploitation of new technology, including AI, by offenders in the online world; and the growing identification and reporting of peer-on-peer abuse. At the same time, we must also acknowledge and address the harsh reality that the majority of child sexual abuse continues to be perpetrated within the family environment.

27. Thus, the failure to fully implement the recommendations of the IICSA is a matter of wide national importance and concern, as without doing so, "*The scale of child sexual abuse* [will remain] *staggering*".

The findings and recommendations of IICSA

The First Recommendation

28. The IICSA's first recommendation in its final report (Recommendation one) was that the Government establish, "**A single set of core data relating to child sexual abuse and child**

sexual exploitation." The Maggie Oliver Foundation is particularly concerned that this recommendation has not been implemented and that there should be mandatory recording of the age, ethnicity, religion and occupation of all perpetrators of child sexual abuse and their victims. This issue, the failure to implement recommendation one of the IICSA has been a matter of very significant public concern.

29. This IICSA first recommendation arose from the IICSA's Child Sexual Abuse by Organised Networks Investigation. In that Report the IICSA addressed the, "**widespread failures to collect data about the ethnicity of perpetrators and victims in the case study areas."** At Section H of that report and in its conclusions the IICSA found: (our emphasis)

> *"30. Problem profiling involves the drawing together by the police of information about child sexual exploitation from different agencies into one place. As the Children's Commissioner made clear in 2013, a profile should include data about how many children and young people have been sexually exploited, intelligence on places of concern, and information on gangs and other networks, groups and individuals who present a risk of sexual harm.*
>
> *31. Despite this, none of the police forces in the case study areas had an accurate profile setting out a clear picture of the networks sexually exploiting children in their area. Profiles were often based on limited, inaccurate or incomplete data. Issues with the flagging process contributed to these problems.* ***There were widespread failures to collect data about the ethnicity of perpetrators and victims in the case study areas."***
>
> *32. As a result, none of the police forces or local authorities in the case study areas had an accurate understanding of the networks sexually exploiting children in their area.*
>
> *33. The improved collection and use of data is critical to the response to child sexual exploitation if these offences are to be properly investigated and resourced.*

30. The IICSA recommended in its Organised Networks Report:

Recommendation 5: Child sexual exploitation data

Police forces and local authorities in England and Wales must collect data on all cases of known or suspected child sexual exploitation and child sexual exploitation by networks. These data should be separated from other data sets, including data on child sexual abuse, and be disaggregated by the sex, ethnicity and disability of both the victim and perpetrator.

This disaggregated data should be used by police forces to inform problem profiling and

activities to disrupt and investigate offenders. Local authorities should take account of the disaggregated data when commissioning services for children.

The UK Government and the Welsh Government should take steps to ensure that these data are being collected and disaggregated in a consistent and accurate way by police forces and local authorities.

31. At page 147 of its final report the Inquiry stated:

The UK government's Tackling Child Sexual Abuse Strategy (2021) recognised that: "the quality and extent of data that is collected on offender and victim characteristics, including, but not limited to, age, gender and ethnicity, is inadequate". It identified a "need to improve the quality and extent of data collected in relation to the modus operandi of offending". It indicated the Home Office would "engage with criminal justice partners, academics, think tanks, charities and frontline professionals on improving the range of data currently collected, the quality of data collected, and drawing out insights from the data to help protect children by preventing and detecting offending". As at June 2022, no further information has been published, although the government has published – in line with its 2021 End-to-End Rape Review Report on Findings and Actions " –performance scorecards"

to monitor progress against key metrics, including timeliness, quality and victim engagement in relation to adult rape offences.

Urgent steps should be taken – led by the UK government and the Welsh Government – to improve the data on child sexual abuse. This should include recording when sexual crimes against children take place outside the family setting, both in prevalence surveys and data collected by the criminal justice agencies and local authorities. These agencies have operational intelligence or risk assessment information about the circumstances in which child sexual abuse has reportedly taken place. That information should be recorded and reported in a way that allows abuse of children outside the family setting to be measured. The Inquiry therefore recommends improvements to the data collected about child sexual abuse and the regular publication of that improved data.

32. The Inquiry made the following recommendation:

The Inquiry recommends that the UK government and the Welsh Government improve data collected by children's social care and criminal justice agencies concerning child sexual abuse and child sexual exploitation by the introduction of one single core data set covering both England and Wales. In order to facilitate this, these agencies should produce consistent and compatible data about child sexual abuse and child sexual exploitation which includes:

- *the characteristics of victims and alleged perpetrators of child sexual abuse, including age, sex and ethnicity;*
- *factors that make victims more vulnerable to child sexual abuse or exploitation; and*
- *the settings and contexts in which child sexual abuse and child sexual exploitation occur.*

Data concerning child sexual abuse and child sexual exploitation should be compiled and published on a regular basis. This should be capable of being collated nationally as well as at regional or local levels.

33. The Defendant's response to Recommendation 1, as set out in the April 2025 update, does not contain any commitment to introduce a single core set of data relating to child sexual abuse and child sexual exploitation. Instead, the Defendant has committed to provide estimates of child abuse experienced during childhood and its prevalence from ONS data by mid/late 2027.

34. The Defendant also states that it will fund CSA data, improve cross agency use of data, introduce a police performance framework, set a timetable to act on a forthcoming review by Baroness Casey and work with stakeholders to agree clear targets and drive up charges and prosecutions. These actions do not amount to implementation of the Inquiry's recommendations.

35. The failure to implement the IICSA's first recommendation is, as you will be aware, the cause of widespread national concern.

36. It is the Claimant's position that without data to identify the scope, scale and nature of a problem, any such problem cannot be adequately addressed, and speculation and extreme views are fueled as they cannot be disproven or confirmed.

37. In her written submission to the Home Affairs Select Committee in 2013 Mrs Oliver, on behalf of the Claimant, flagged to Committee Chair the importance of a national database containing this information. This basic and fundamental step has still not been actioned 12 years later, despite the first recommendation in the final IICSA report.

The Fifth Recommendation

38. The fifth recommendation from IICSA was for the prohibition of pain compliance techniques on children in custodial institutions. This recommendation arose from the IICSA's "Children in

Custodial Institutions" investigation. In the Report arising from that Investigation, the IICSA made seven recommendations, including that the use of pain compliance techniques should be prohibited (recommendation 5).

39. These recommendations appear at page 102 of the Investigation Report, and are as follows:

> ***Recommendation 5***
>
> *The Chair and Panel consider that the use of pain compliance techniques should be seen as a form of child abuse, and that it is likely to contribute to a culture of violence, which may increase the risk of child sexual abuse.*
>
> *The Chair and Panel recommend that the Ministry of Justice prohibits the use of pain compliance techniques by withdrawing all policy permitting its use, and setting out that this practice is prohibited by way of regulation."*

40. It is relevant to note that the Inquiry identified three techniques in its final report, which it determined to be child abuse. The Inquiry stated at paragraphs 15.2 and 16 of its final report as follows: (emphasis added)

> *"15.2 There are also three techniques which are deliberately designed to cause pain to the child – a* ***mandibular angle technique*** *(applying pressure directly under the ear lobe in the crease between the jaw and the neck****), thumb flexion and wrist flexion*** *(often misdescribed as 'pain-inducing 'techniques or restraint, but also referred to as 'pain distraction 'or 'pain compliance'). The intention is that the infliction of brief, sharp pain will cause a child to desist and comply with instructions. The MMPR guidance states that use of these techniques may be "justifiable" in the case of "immediate risk of serious physical harm".*
>
> *16. The deliberate infliction of pain is a form of child abuse and is likely to contribute to a culture of violence as well as to an environment where sexual abuse may be more likely to*

occur and also less likely to be reported if it does occur. As a result, in its Sexual Abuse of Children in Custodial Institutions: 2009–2017 Investigation Report (published in February 2019), the Inquiry recommended that the government should prohibit these practices."

41. In its final report the Inquiry made the following recommendation: (emphasis added)

> ***Recommendation 5: Pain compliance***
>
> *The Inquiry recommends (as originally stated in its Sexual Abuse of Children in Custodial Institutions: 2009–2017 Investigation Report, dated February 2019) that the UK government* ***prohibits the use of any technique that deliberately induces pain*** *(previously referred to by the Inquiry as 'pain compliance techniques') by withdrawing all policy permitting its use in custodial institutions in which children are detained, and setting out that this practice is prohibited by way of regulation.*

42. It is very important to highlight that the Department for Education, in its 15 May 2025 Report (Children accommodated in secure children's homes) found that, as at, *"... 31 March 2025, 47% of the children accommodated in secure children's homes were placed on welfare grounds."* That is to say, 47% of child detainees are detained because they are poor.

43. Therefore children, who have been convicted of no crime, in the care of the state are being subjected to or threatened with pain compliance techniques that the IICSA described as "child abuse".

44. On 17 August 2023 the previous government appeared to confirm that staff were no longer permitted to use restraint techniques which deliberately cause pain, the government which amended paragraph 5.28 of the Use of Force, Restraint and Restrictive Practices in the Children and Young People Secure Estate (CYPSE). The amendment was made on 17 August 2023 and effective from February 2024. It reads as follows: (emphasis added)

"5.28 ***Staff are not permitted to use restraint techniques which deliberately cause pain,*** *however there may be instances where they are responding to an incident where the life of a child or someone is at threat or there is risk that they will suffer a significant or life changing injury and the common law principle of using an intervention which is reasonable, necessary and proportionate with the intended outcome will apply. All such instances will be subject to detailed and thorough review and staff members who were involved will be expected to be fully accountable for the action taken"*

45. It appears that the government accepted in 2023 that reasonable force could be used 'which is necessary and proportionate'. We have assumed that the government accepted that the mandible angle technique, thumb flexion technique and wrist flexion technique would not be accepted as 'necessary and proportionate' and that other non-pain inducing restraint techniques would be used. However, the issue is now unclear.

46. This lack of clarity has been exacerbated by the 9 April 2025 update, in which the Defendant appears to suggest that 'these techniques' i.e. the mandible angle technique, thumb flexion technique and wrist flexion technique are acceptable, but only as a last resort. The 9 April 2025 update states as follows:

The Government recognises the particular vulnerability of children in custody but to protect all children in custody, and staff, where physical safety is at significant risk, ***it is important that trained staff are able to use these techniques, as a last resort in an emergency, to bring an incident to a safe conclusion****. We will work with the Youth Custody Service to ensure that staff continue to be appropriately trained in their safe use and that independent oversight, through an Independent Restraint Review Panel, ensures scrutiny and transparency over all uses of these techniques.*

47. We therefore request that the Defendant confirms within its response to this pre-action letter, whether it considers that it has implemented Recommendation 5 and to what extent.

48. We maintain that, in the event that the Secretary of State confirms that it has not implemented Recommendation 5, such failure would breach Article 3 of the UN Convention on the Rights of the Child ("UNCRC"), to which the UK is a party, which provides that:

> *"Article 3 – Best Interests of the Child*
>
> *In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration."*

Recommendation Six - Amend the Children Act 1989 to give parity of legal protection to children in care.

49. The Inquiry noted that children in custody are not able to engage with the outside world in the same way as their peers and that they have little control over their lives and limited lines of communication.

50. The Inquiry noted in its final report (at page 176) that the number of looked after children has increased every year since 2010 and that the circumstances that such children face makes looked after children particularly vulnerable to sexual abuse and exploitation[1].

51. The Inquiry stated: *Around half of children whose cases were considered as part of the Inquiry's Child Sexual Exploitation by Organised Networks Investigation Report were children in care. Prevailing prejudices concerning a person's vulnerability, such as social isolation and prior trauma, can be manifested as additional barriers for a looked after child who discloses sexual abuse. This makes it even more difficult for those children to get the help they need.*

[1] At page 177

52. The Inquiry commented on the regime under the Children Act 1989 and its impact on children in care:

> *"The Children Act 1989 (the 1989 Act) separates the powers of courts from those of local authorities. Courts can make orders under section 8 of the 1989 Act to limit or mandate an aspect of parents 'exercise of their parental responsibility. A court has no such ability in respect of a child in care. Where a court finds that parents 'actions have caused a child to experience, or be at risk of, significant harm, it may make a care order so that a local authority effectively has 'overriding 'parental responsibility over that child.*
>
> *The local authority then has day-to-day care of, and control over, the child as their 'corporate parent'. Section 9 of the 1989 Act prevents section 8 orders being made against parents in respect of children who are the subject of a care order.*
>
> *The effect of this legal regime is to create a separation of powers between courts and local authorities. Courts can make decisions about children who are not in care, but only local authorities can make decisions about children who are in care.*
>
> *In a number of cases, senior judges have observed that this 'separation of powers 'gave rise to serious practical and legal problems for children. The government responded by introducing an Independent Reviewing Officer, who can refer a child's case to court. However, that power is rarely used in practice and in a number of cases senior judges have commented on their limited utility."*

53. The Inquiry went on to consider that children in care have limited ways of controlling the actions of a local authority. There is a power to ask the court to discharge a care order, but this has limited value where the child has no alternative carer. Children can bring Human Rights challenges, but rarely do so. Furthermore, children in care can bring applications for judicial review, but this remedy is used little and posits a high threshold.

54. The Inquiry concluded by making the following recommendation:

> ***Recommendation 6: Children Act 1989***
>
> *The Inquiry recommends that the UK government amends the Children Act 1989 so that, in any case where a court is satisfied that there is reasonable cause to believe that a child who is in the care of a local authority is experiencing or is at risk of experiencing significant harm, on an application by or for that child, the court may:*
>
> • *prohibit a local authority from taking any act (or proposed act) which it otherwise would be entitled to take in exercising its parental responsibility for the child; or*
>
> • *give directions for the purpose of determining a specific question which has arisen, or which may arise, in connection with any aspect of the local authority's exercise of parental responsibility for a child*

55. In the April 2025 Progress Update, the Defendant confirmed that the Secretary of State has refused to implement Recommendation 6. The Update states as follows:

> *"The Government also recognises the vulnerability of children living in residential care and the unique responsibilities on those caring for them to ensure they are well looked after. While there are a range of systems in place to ensure a child's care plan is properly implemented, and to enable children in residential care to raise concerns by talking to trusted adults, the Government agrees that more should be done to ensure children's voices are heard in decision-making. Their rights in the Children Act 1989 must be respected, with children in care having clear and timely routes to raise concerns about any aspect of their care, including where they are experiencing or at risk of experiencing serious harm, and such concerns must be acted upon.*
>
> *To enable this strengthening of protections for children looked after by local authorities, we will introduce new National Standards for Advocacy for Children and Young People and*

revised statutory guidance on Providing Effective Advocacy for Children and Young People Making a Complaint under the Children Act 1989 in 2025. This does not need an amendment to the Children Act 1989, but this will include new standards on:

- *The provision of specialist non-instructed advocacy for children with complex needs and learning disabilities (as recommended by the Child Safeguarding Practice Review Panel's report on Safeguarding children with disabilities in residential settings).*

- *Requirements for advocacy in the safeguarding of children – being clear on the role of advocates in the identification of concerns and the need to make direct referrals and to escalate where necessary"*

56. The Claimant maintains that the proposed creation of national advocacy standards does not come anywhere near to giving children in care parity of legal protection through primary legislation. The Defendant has failed to provide any reasoned or rational justification for its failure or refusal to implement a fundamental recommendation that as made by IICSA.

The IICSA final report – The Inquiry's 20 recommendations for change

57. As you will be aware, in its Final Report published on 20 October 2022, the Inquiry made 20 concluding recommendations, including six from earlier reports, which were reiterated. These are set out in full in Section II, Part K of the Final Report (pages 326-354).

58. In summary, the Inquiry recommended that the UK (and Welsh) governments:

    1. **Introduce a single set of core data relating to child sexual abuse and child sexual exploitation**. As stated above, the Defendant has declined to act on this recommendation.

2. **Create a Child Protection Authority in England and in Wales.** The Defendant has stated that it will create a Child Protection Authority in England (oddly, not in Wales). However, the Defendant has not stated that it will implement the recommendation of the Inquiry. Rather, it will embark on a consultation exercise 'on a roadmap to a CPA'. The Defendant has also stated that the CPA, when eventually implemented, will not have any powers of inspection. The Defendant sets out a number of initiatives, which do not directly bear on the establishment of a CPA. No timetable is provided for the establishment of a CPA, which is stated to be conditional on a consultation process.

3. **Create a cabinet-level Minister for Children**. The Defendant will not act on this recommendation and prefers to maintain the status quo, whereby the Secretary of State for Education will continue to act as the Cabinet Minister for Children. The Defendant has provided no substantive reasons why the recommendation from IICSA and the reasoning behind that recommendation has been rejected.

4. **Commission regular programmes of activity to increase public awareness about child sexual abuse**. The Defendant appears to have committed to implementing this recommendation and sets out examples of proposed work in collaboration with The Children's Society, the Fearless Programme, Lucy Faithfull Foundation and Stop it Now.

5. **Prohibit the use of any technique that deliberately induces pain (previously referred to by the Inquiry as 'pain compliance techniques') by withdrawing all policy permitting its use in custodial institutions in which children are detained, and setting out that this practice is prohibited by way of regulation**. As stated above, the Defendant has declined to act upon this recommendation.

6. **Amend the Children Act 1989 to give parity of legal protection to children in care.** As stated above, the Defendant has declined to act upon this recommendation.

7. **Introduce the registration of care staff in children's homes**. The Defendant has not confirmed that it will implement this recommendation within a defined timescale. The

Defendant states in the April 2025 update that it will consider consultation with 'key stakeholders' by 2028/29 'to determine whether registration is the right approach'.

8. **Introduce professional registration of staff in roles responsible for the care of children in young offender institutions and secure training centres**. Again, the Defendant has not confirmed that it will implement this recommendation within a defined timescale. The Defendant states in the April 2025 update that it will consult with key stakeholders and assess current and future options and costs for implementing a registration framework. As part of this work the Defendant will 'explore the merits of external registration', and announce a decision by March 2026.

9. **Make arrangements to enable any person engaging an individual to work or volunteer with children on a frequent basis to check whether or not they have been barred by the Disclosure and Barring Service from working with children**. The Defendant has broadly agreed to implement this recommendation.

10. **Take steps to improve compliance by regulated activity providers with their statutory duty to refer concerns about the suitability of individuals to work with children to the Disclosure and Barring Service**. The Defendant has broadly agreed to implement this recommendation.

11. **Extend the disclosure regime to those working with children overseas**. The Defendant has agreed to implement this recommendation.

12. **Introduce a mandatory requirement for all regulated providers of search services and user-to-user services to pre-screen for known child sexual abuse material**. The Defendant has not agreed to implement this recommendation, but rather will conduct an ongoing assessment of whether the measures contained in the Online Safety Act will enable Ofcom to achieve this objective. It is unclear whether the Online Safety Act provides the necessary level of protection recommended by ICCSA.

13. **Introduce legislation which places certain individuals ('mandated reporters') under a statutory duty to report child sexual abuse in certain circumstances**. The Defendant has agreed to implement this recommendation through the introduction of clauses into the Crime and Policing Bill.

14. **Commission a joint inspection of compliance with the Victims' Code in relation to victims and survivors of child sexual abuse**. The Defendant has agreed to implement this recommendation through asking the Criminal Justice Joint Inspectorates (CJJI) to include an inspection on the experiences of victims of child sexual abuse in the criminal justice system, including compliance with the Victims' Code, in their 2025-27 Business Plan.

15. **Remove the three-year limitation period for personal injury claims brought by victims and survivors of child sexual abuse.** The Defendant has agreed to remove the three-year time limit for victims to bring civil child sexual abuse claims with the burden of proof falling on defendants (rather than victims, as at present) to show that a fair trial is not possible.

16. **Provide a national guarantee of specialist therapeutic support for child victims.** The Defendant has failed to provide the guarantee as per the Inquiry recommendations. It has committed to fund initiatives in 2025/26 and to 'use the learning' from a CSA Centre programme to support and wider roll out, 'subject to funding'. The Defendant says that the Government will work on ambitious proposals for improving the therapeutic support offer.

17. **Direct the Information Commissioner's Office to introduce a code of practice on retention of and access to records known to relate to child sexual abuse.** The Defendant has committed to lay regulations in Autumn 2025 instructing the Information Commissioner's Office to produce a code of practice on the retention of personal data relating to CSA.

18. **Implement further changes to the Criminal Injuries Compensation Scheme to: include other forms of child sexual abuse, including online-facilitated sexual abuse; amend the rule on unspent convictions; and increase the time limit for child sexual abuse applications.** The Defendant has declined to amend the CICS because it maintains that the core principle of the Scheme is that it should be applicable to all crimes.

19. **Establish a single, tiered redress scheme in England and Wales, taking into account devolved responsibilities.** The Defendant states that the Government is not currently taking forward any further steps on the IICSA proposal for a separate, national financial redress scheme. The Defendant refers to 'the huge challenges' in establishing such a redress scheme and states that survivors must continue to be able to seek redress from individual institutions where there has been fault.

20. **Introduce legislation requiring providers of online services and social media platforms to implement more stringent age verification measures.** The Defendant states that the Government will continue to monitor whether the Online Safety Act is appropriately tackling the issue of children accessing social media below the minimum ages set in firms' terms of service. If this is found not to be the case, the Government will consider what further intervention is needed to strengthen the enforcement of minimum age limits. It is unclear whether the Online Safety Act provides the necessary level of protection recommended by ICCSA.

59. In its concluding remarks, the Inquiry stated that *"addressing the past and present concerns requires **prompt and effective action**"* and as such, it *"expects the UK government, the Welsh Government and the specified institutions to act upon its recommendations promptly"* (Part K, paras 122, 124). It also commented that *"**the recommendations are designed to provide a comprehensive response by the State**, as well as institutions and organisations which work with*

children, to address the very current problems in preventing, reporting and responding to child sexual abuse" (Part K, para. 123) (emphasis added).

Further Ministerial Statements

60. On 24 October 2022, two days after the publication of the Inquiry's Final Report, the then SSHD, Grant Shapps MP, made a statement to Parliament (emphasis added):

> *" ... I have laid a copy of the inquiry's report before Parliament. It is only right that the Government will now take time to carefully consider its findings and recommendations in full.* ***We will respond comprehensively*** *and in line with the inquiry's deadline, but let me make this promise now:* ***I will use all available levers to protect our children and right the wrongs exposed by the inquiry's findings***, ***I will do all in my power to improve how law enforcement and the criminal justice system respond to child sexual abuse***, *and I will work with ministerial colleagues and across party lines to hold organisations to account, bring perpetrators to justice and support victims and survivors with compassion and total care.*
>
> *[...]*
>
> *Child sexual abuse is a terrible but preventable crime—and we must prevent it.* ***We will do so with the inquiry's recommendations in front of us and with the words of heroic survivors ringing in our ears.*** *I commend this statement to the House."*

61. In response to a statement made by Theresa May MP, the SSHD stated (emphasis added):

> *"I thank my right hon. Friend for all that she did in setting up the inquiry. This has involved seven years, 725 witnesses, 20 reports across 15 investigations, 24 research reports and, as I mentioned, the processing of 2 million pages of evidence.* ***It is extremely important that***

we take all this information and ensure that we act on it, and I give an undertaking from the Dispatch Box today to honour the spirit in which she set up the inquiry in the first place."

62. Finally, the SSHD stated as follows (emphasis added):

> *" ... As I mentioned, the problem of sexual abuse happens in so many different settings, so we have to act simultaneously on all fronts. This seven-year report—brilliantly commissioned by my right hon. Friend the Member for Maidenhead, as many colleagues have mentioned—is just the start.* ***We now need to make sure that we enact all the recommendations.***" (Vol 721, Col 46-60)

63. On 22 May 2023, Suella Braverman MP (the then SSHD) stated in Parliament (in reference to the government's response of the same date to the IICSA final report) that:

> *"The interests of victims and survivors are at the heart of the inquiry's report, and of the Government's response ... Today is about ensuring their voices are heard and reflected in our work, so that future generations do not suffer as they did. I promise that their courage will count"*. She reiterated that *"we are accepting the need to act on 19 of the inquiry's 20 final recommendations"* (Vol 733, Col 41-43).

64. On 30 May 2023 the IICSA panel (Alexis Jay OBE, Drusilla Sharpling CBE, Ivor Frank and Sir Malcolm Evans) wrote a letter to the Times Newspaper and stated:

> *" Sir, We are writing to express our deep concern at the government's inadequate response to the 20 recommendations in the final report of the Independent Inquiry inti Child Sexual*

Abuse. The Inquiry lasted seven years, published 52 reports and made more than 100 recommendations. These were based on exhaustive investigations, research, consultation and formal evidence taking from victims, experts and a wide range of organisations and institutions.

By its response the government seems to have failed to understand the recommendations either in substance or significance, Some are deemed to be 'accepted 'when, in reality, they clearly are not, while others are conditional on yet more research, review or consultation. To none is a timeline attached or a committed action plan. We fear that for the sake of other political priorities, action will be deferred indefinitely.

While the government is free to reject or partially accept the recommendations of a statutory public inquiry, what it ought not to be free to do is purport to accept them through what is little more than a very weak and, at times, apparently disingenuous official response. As a result, the hopes and expectations of victims and survivors will be dashed yet again, and the scourge of child sexual abuse will continue to increase unabated."

65. On 16 January 2025 the Secretary of State for the Home Department made the following statement: (emphasis added)

Earlier this week, she (Jess Phillips MP) and I met Professor Alexis Jay, who chaired both the seven-year national independent inquiry into child sexual abuse and the first local independent inquiry into grooming gangs in Rotherham. Professor Jay's strongest message to us was that the survivors, who bravely testified to the terrible crimes committed against them, must not be left to feel that their efforts were in vain because, despite all the inquiries, no one listened and nothing was done. Following those discussions, I want to update the House on our next steps to take forward the inquiry's recommendations, and to go further in tackling sexual exploitation and grooming on the streets and online, in order to keep children safe.....

Before Easter, the Government will lay out a clear timetable for taking forward the 20 recommendations of the final IICSA report. Four of those are specifically for the Home Office. I can confirm that we have accepted them in full*, including on disclosure and barring, and work is already under way. A cross-Government ministerial group is considering and working through the remaining recommendations, and that group will be supported by our new victims and survivors panel. In addition, I can confirm today that the Government will implement all the remaining recommendations in the child abuse inquiry's separate stand-alone report on grooming gangs from February 2022, including updating key Department for Education guidance.*

Nothing matters more than the safety of our children, yet for too long, this horrific abuse was allowed to continue. Victims were ignored, perpetrators were left unpunished, and too many people looked the other way. Even when these shocking crimes were brought to light and national inquiries were commissioned to get to the truth, the resulting reports were too often left on the shelf as their recommendations gathered dust. Under this Government, that has changed. ***We are taking action not just on those recommendations, but on the additional work that we need to do to protect victims, put perpetrators behind bars and uncover the truth wherever things have gone wrong. This is about the protection of children, the protection of young girls, and the radical and ambitious mission that we have set for this Government to halve violence against women and girls in a decade.*** *I hope all Members will support that mission and support the measures that we have outlined today to help achieve that aim. I commend this statement to the House.*

Legitimate Expectation

66. The Supreme Court in ***Re Finucane's Application for Judicial Review*** **[2019] UKSC 7; [2019] 3 All ER 191** reviewed several of the leading cases on substantive legitimate expectations. Lord Kerr (with whom Lady Hale, Lord Hodge and Lady Black agreed) stated at **[62]**:

"62. From these authorities it can be deduced that where a clear and unambiguous undertaking has been made, the authority giving the undertaking will not be allowed to depart from it unless it is shown that it is fair to do so. The court is the arbiter of fairness in this context. And a matter sounding on the question of fairness is whether the alteration in policy frustrates any reliance which the person or group has placed on it. This is quite different, in my opinion, from saying that it is a prerequisite of a substantive legitimate expectation claim that the person relying on it must show that he or she has suffered a detriment."

67. Statements addressed to the public at large (or a subsection of it) may give rise to legitimate expectations. This includes statements made to, or answers given in, Parliament: ***R (Abbasi) v Secretary of State for Foreign and Commonwealth Affairs*** **[2002] EWCA Civ 1598; [2003] UKHRR 76** at **[91]**; and ***R (British Civilian Internees (Far East Region)) v Secretary of State for Defence*** **[2003] EWCA Civ 473; [2003] 3 WLR 80** at **[2]**.

68. More weight might be placed on expectations of a fundamental human right, such that some rights are entitled to greater protection than others: see for example ***R (Reprotech (Pebsham) Ltd) v East Sussex CC*** **[2002] UKHL 8; [2003] 1 WLR 348** at **[34]** where Lord Hoffman contrasted the right to a home with ordinary property rights which *"are in general far more limited by considerations of public interest"*.

United Nations Convention on the Rights of the Child

69. Article 3 of the UN Convention on the Rights of the Child (**"UNCRC"**), to which the UK is a party, provides that:

"Article 3 – Best Interests of the Child

In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration."

70. Article 34 UNCRC specifically concerns the sexual exploitation of children. It provides:

> *"Article 34 – Sexual Exploitation of Children States*
>
> *Parties undertake to protect the child from all forms of sexual exploitation and sexual abuse. For these purposes, States Parties shall in particular take all appropriate national, bilateral and multilateral measures to prevent: (a) The inducement or coercion of a child to engage in any unlawful sexual activity; (b) The exploitative use of children in prostitution or other unlawful sexual practices; (c) The exploitative use of children in pornographic performances and materials."*

PROPOSED GROUNDS FOR JUDICIAL REVIEW

71. As detailed above, the proposed grounds for judicial review in this matter are as follows:

Proposed Ground One

72. The Defendant has acted unreasonably and/or in breach of a legitimate expectation in failing to implement all of the 20 recommendations of the ICCSA report, in line with the public statement made on 16 January 2025.

73. The Secretary of State has acted in breach of a legitimate expectation when failing to implement any of the Inquiry's recommendations. The Claimant relies upon unequivocal public statements as detailed above made by the Secretary of State that the recommendations would be implemented. The Claimant will aver that the public statements as to implementation were understood to convey that the implementation would be undertaken within a reasonable timeframe.

74. Further, the Defendant has acted in breach of her duty to consider the interests of children (Article 3 UNCRC) and protect them from all forms of sexual exploitation and sexual abuse (Article 34 UNCRC).

75. Proposed Grounds 2-5 would be pleaded as alternatives to this first Ground.

Proposed Ground Two

76. The Defendant has acted unreasonably in failing or refusing to implement recommendation 1 of the recommendations made by the Independent Inquiry into Child Sexual Abuse ("IICSA") in its Final Report published on 20 October 2022 (A single set of core data relating to child sexual abuse and child sexual exploitation).

77. Further and alternatively, the Defendant has failed to provide adequate reasons for failing to implement this key recommendations from IICSA.

Proposed Ground Three

78. It is unclear whether the Defendant has failed or refused to implement the Inquiry's recommendation to prohibit the use of pain inducing restraint techniques in detention centres (Recommendation 5). We understand that the Defendant's position is that 'techniques' may be used to restrain a child in a dangerous situation. We have asked that the Defendant confirms what 'techniques' would be permitted in such circumstances and whether it is now the Defendant's position that the mandible angle technique, thumb flexion technique and wrist flexion technique are acceptable, but only for use as a last resort.

79. In the event that the Defendant confirms that she has not implemented Recommendation 5, we will challenge that failure. Any such failure to implement Recommendation 5 may include the following grounds:

    i. The Defendant's actions are unreasonable *inter alia* because the Defendant purported to implement the recommendation in August 2023.

ii. Alternatively, the decision by the Defendant in this regard breaches Article 3 of the UN Convention on the Rights of the Child.

iii. Furthermore, the Defendant's failure to accept Recommendation 5 is incompatible with her positive duty to act to avoid a risk of breaching Article 3 of the ECHR.

iv. In the further alternative the Defendant has failed to provide adequate reasons for failing to implement this key recommendations from IICSA.

Proposed Ground Four

80. The decision of the Secretary of State to reject the Inquiry's recommendation to amend the Children Act 1989 to give parity of legal protection to children in care (Recommendation 6) (Proposed Ground Four) was unreasonable.

81. Alternatively, the decision by the Defendant in this regard breaches Article 3 of the UN Convention on the Rights of the Child.

82. In the further alternative, the decision of the Defendant in refusing to implement Recommendation 6 discriminates against children in care and breaches the Equality Act 2010.

83. Furthermore, the Defendant has failed to provide adequate reasons for failing to implement this key recommendations from IICSA.

Proposed Ground Five

84. The Defendant acted unreasonably in deciding not to implement recommendations 2, 7, 8, 12, 16 and 20, but instead to determine that, notwithstanding assurances that the recommendations would be implemented, any implementation would be contingent on further consultation, monitoring, review or other action.

85. The Secretary of State has acted irrationally and unreasonably in failing to set a timetable for implementation. The Secretary of State has acknowledged that: '*Over 7 years, that inquiry – expertly led by Professor Alexis Jay – engaged with more than 7,000 victims and survivors, processed 2 million pages of evidence and published 61 reports and publications'.*

86. It is submitted that many hundreds of victims and survivors of Child Sexual Abuse gave evidence before the IICSA and, in many cases, experienced re-traumatisation through having to re-live the experiences of their abuse. Those victims put themselves forward in the hope that future generations of children would not be required to undergo similar abuse from sexual predators in the future.

87. Furthermore, whilst a delay in implementation might in some cases be acceptable – it is neither acceptable nor reasonable for the victims and survivors of abuse who contributed to the Inquiry to be left in a position where they are unable to know when a number of important recommendations of IICSA will be implemented, if at all.

88. Most importantly, the failure to implement the recommendations of the IICSA has contributed to the failure to protect large numbers of vulnerable children across the United Kingdom.

Action that we require you to take

89. We require that the Defendant takes the following action:

    a. Confirm that all 20 of the recommendations made by IICSA will be implemented within a specified timeframe (i.e. by October 2025, which would be three years after the IICSA published its recommendations);

    b. Sets out the actions that are to be taken in respect of each of the said 20 recommendations;

c. Provides a timetable for implementation of the 20 recommendations and detailed proposals as to how the aforesaid 20 recommendations will be implemented;

d. Confirms the extent to which the Defendant maintains that it has complied or not complied with Recommendation 5 of the IICSA final recommendations;

e. Alternatively confirms that the Defendant will implement Recommendation One in full and within a defined timetable;

f. Alternatively confirms that the Defendant will implement Recommendation Six in full and within a defined timetable;

g. In the further alternative, confirms that the Defendant will implement Recommendations 2, 7, 8, 12, 16 and 20 within a fixed timetable period;

h. Where no immediate action is to be taken in respect of a particular recommendation, publishes details of the specific steps the UK government will take in response to each recommendation to ensure that it is fully implemented promptly and effectively.

90. Accordingly, we must insist on the above actions being taken in response to this letter before **4pm on 30 June 2025**, the Reply Date specified at the outset of this letter.

91. Alternatively, we would accept an unequivocal undertaking before the said Reply Date that the above action will be taken with a timetable for implementation of the action.

92. Should we not receive a satisfactory response in relation to these matters before the Reply Date, we will issue Judicial Review proceedings, in which we will seek:

a. Declaratory relief as to unlawfulness based on the reasons given above;

b. An Order to compel the Secretary of State to unequivocally accept the IICSA's 20 recommendations;

c. An order to compel the Secretary of State to provide a timetable as to the implementation of the 20 recommendations;

d. Alternatively, orders to compel the Defendant to Implement Recommendations 1, 5 and 6 and orders to compel Defendant to provide a timetable for implementation of Recommendations 2, 7, 8, 12, 16 and 20.

Action to be taken by the Claimant

93. Should the SSHD fail to take the above action by the response date specified at the outset of this letter, the Claimant will commence Judicial Review proceedings in accordance with the pre-action protocol and seek to recover the costs in bringing the claim from you.

Proposed Interested Parties

94. We wish to put you on notice that we are considering the addition of interested parties, including the IICSA Chair and panel, in these proposed proceedings.

Costs Capping Order

95. Given that the matters are (on the basis of the government's statement of the 9 April 2025) plainly matters of public interest and widespread national importance, The Maggie Oliver Foundation will seek a Costs Capping Order under CPR 46, which the Defendant will be invited to agree, and which we anticipate the Court will grant.

96. As a Charity, The Maggie Oliver Foundation does not have the means to fund a claim that meets the criteria set out at sections 88 and 89 of the Criminal Justice and Courts Act 2015. To do so, would divert the limited resources of The Maggie Oliver Foundation away from their support of traumatised victims of child sexual abuse.

Details of Claimant's solicitors

97. The Claimant's solicitors in this matter are:

David Enright
Howe + Co
1010 Great West Road,
London
TW8 9BA
[redacted]
Tel: 0208 840 4688

98. If you are responding close to the given deadline then please ensure that the letter is sent by email as well as by post to ensure receipt prior to the given deadline.

Address for Reply

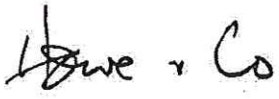
99. For the avoidance of doubt, the address for reply is: David Enright by email – [redacted]

Alternative Dispute Resolution

100. We are happy to consider any proposal from the Proposed Defendant in relation to Alternative Dispute Resolution within the next 14 days. However, we will not entertain any proposals that would result in our having to delay issuing a claim for judicial review beyond 3 months of the date of the Secretary of State's public statement of 8 April 2025.

101. If you have any queries, please contact us via the email address mentioned above.

Yours sincerely



DAVID ENRIGHT JP

PARTNER

HOWE + CO SOLICITORS

CC. Government Legal Department, by way of formal service