



Department of
Justice
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**ORGANISED
CRIME
TASK FORCE**

NORTHERN IRELAND MODERN SLAVERY STRATEGY

2019 - 2020

1. FOREWORD

I am pleased to publish the third modern slavery strategy for Northern Ireland.

The landscape has changed significantly since the Department published its first action plan to tackle the issue, in 2013. Since then, we have made steady progress in tackling human exploitation, but we must not become complacent in our pursuit of eradicating modern slavery.

Modern slavery is a truly abhorrent practice that can often have a lasting physical and psychological effect on its victims. It is unsettling to realise that those who are vulnerable in our society could be subjected to such crimes, but the distressing reality is that callous traffickers and enslavers are continuing to operate across Northern Ireland.

Whilst this is an annual strategy, it also takes a longer-term view, setting out our planned trajectory and strategic direction beyond the year ahead. Rather than focusing on a single year in isolation, partners have come together to set a two-year vision; this approach acknowledges that modern slavery is a complex issue and that the majority of responses to it are not “quick fixes” but will require time to take effect.

This strategy also focuses specifically on objectives and actions that are **transformational** in nature. I recognise and welcome the significant good work that continues to be taken forward on a day-to-day basis by partners across Government, statutory agencies and civil society. However, the focus of this new strategy is fixed on new and transformational initiatives and activities that are intended to ‘turn the curve’ in terms of improving outcomes around reducing modern slavery and supporting victims and survivors.

Our strategic priorities are to Pursue, Protect and Prevent. The actions under the “Pursue” strand seek to enhance the operational response to pursue and disrupt offenders and bring them to justice. We have recently welcomed the first convictions under the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. This is encouraging; it undermines any “low-risk, high profit” perceptions held by exploiters and sends out a strong message that modern slavery will not be tolerated.

Support and protection for victims and potential victims remain central to this strategy. However, we also recognise the need to prevent people from getting drawn into slavery in the first place by reducing the vulnerability of those who may be targeted by traffickers and enslavers; ensuring that the general public is equipped to spot the signs of exploitation and report any suspicions; and by seeking to tackle demand. The strategy also seeks to strengthen cross-sector resilience through the development of a strategic approach to training across relevant sectors in Northern Ireland.

The programme of work that we have committed to is challenging and ambitious, but we have also sought to ensure that it remains realistic and

achievable by prioritising our collective efforts and resources in those areas that will have the most impact in terms of improving criminal justice outcomes; supporting victims and survivors; and addressing factors that allow modern slavery to occur. Successful implementation relies on strong partnership-working, both in Northern Ireland and further afield.

I am grateful to all those who have worked with my Department to develop this strategy. I look forward to sustained and increased collaboration with statutory and non-governmental partners as we seek to make Northern Ireland a hostile place for those intent on exploiting their fellow human-beings.



PETER MAY

Permanent Secretary, Department of Justice

2. INTRODUCTION

Background

2.1 This is the third modern slavery strategy for Northern Ireland, published in accordance with section 12 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 (“the 2015 Act”). In line with section 12, the purpose of the strategy is ***to raise awareness of modern slavery offences and so to reduce the threat from, the vulnerability to, and the prevalence of, modern slavery in Northern Ireland.***

2.2 Section 12 of the 2015 Act requires the strategy to cover a number of specific areas. These have been set out below and mapped against the relevant parts within the strategy for ease of reference.

or dealing with the victims of such offences.	
Provisions aimed at raising awareness of the rights and entitlements of victims of such offences	R3

Duration of strategy

2.3 Section 12 of the 2015 Act requires the Department of Justice (DoJ) to produce an annual modern slavery strategy. The Northern Ireland Assembly has been dissolved since 26 January 2017. Due to the absence of a Justice Minister to approve a fresh strategy, DoJ extended delivery against the 2016/17 strategy beyond its intended 12 month life-span. During this extended period, delivery has continued against previously identified priorities, whilst the Department has also been working with partners to map out the longer-term strategic direction. This new strategy is intended to cover the 2019 to 2020 financial year, however, it acknowledges that some of the objectives and work streams identified will necessarily roll over into future strategy years. In taking this longer view our intention is to be able to prioritise more effectively and to identify meaningful strategic outcomes. Chapter 4 therefore provides an overview of commitments with indicative time-frames for delivery across a two-year period.

Legislative requirement	Reference
Arrangements for co-operation between relevant organisations in dealing with relevant offences or the victims of such offences.	R1
Provision as to the training and equipment of those involved in investigating or prosecuting relevant offences	R2

About this strategy

2.4 The strategy builds on a significant body of work to tackle modern slavery that has already been delivered or put in place under previous strategies and action plans.

2.5 It has been developed and informed through engagement with other partners across Government, law enforcement and civil society who are committed to working together to tackle modern slavery both in Northern Ireland and internationally. The effectiveness of our response is multiplied when we work together and as such, the strategy also reflects our shared priorities, objectives and commitment to delivery.

2.6 In developing the strategy we have also been informed by data, assessment and intelligence provided by law enforcement partners and we have taken account of ongoing work, initiatives and strategic approaches that have been put in place in neighbouring jurisdictions in the UK and Ireland, and internationally. Human rights standards underpin the strategy and inform our policy, legislative and strategic responses.

Context

2.7 **Modern slavery is an umbrella term often used to describe offences of human trafficking and also of slavery, servitude and forced or compulsory labour.** The term is used to cover offences under both Sections 1 and 2 of the 2015 Act. The offence of slavery, servitude and forced or compulsory labour covers situations in which people are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities. It can be closely related to human trafficking, which involves the **movement** of a person for the purpose of exploiting them. Human trafficking can involve a range of different types of exploitation, including labour exploitation, sexual exploitation, criminal exploitation or organ harvesting. An individual may be exploited through the use of force or threat or other forms of coercion, or by manipulating a particular vulnerability, such as their age, isolation or other factors that may make them vulnerable. Section 3 of the 2015 Act sets out the meaning of exploitation in respect of the human trafficking offence.

2.8 Modern slavery offences are often considered to be hidden crimes, which can make it difficult to establish an accurate assessment of the nature and extent of the problem in Northern Ireland. The National

Referral Mechanism (NRM) is the UK's referral mechanism for identifying and supporting victims and potential victims of modern slavery. First Responders are responsible for completing and submitting NRM referral forms in cases where an individual is suspected to be a potential victim of human trafficking or modern slavery. The First Responder organisations in Northern Ireland who may make NRM referrals are:

- Police Service for Northern Ireland (PSNI);
- Health and Social Care Trusts (HSCTs);
- Gangmasters Labour Abuse Authority (GLAA);
- UK Border Force (UKBF);
- UK Immigration Enforcement (UKIE).

The Home Office is currently leading on major reform of the NRM, and DoJ's participation in this reform programme is referenced in the strategy. The Home Office is also responsible for ensuring that NRM referral data is collected from all relevant organisations across the UK and collated centrally. The Home Office, through UK Visas and Immigration (UKVI), UKIE, and UKBF, also has an operational role in the identification of victims and potential victims through the NRM. This NRM data currently helps to inform much of our understanding of the nature and scale of human trafficking and modern slavery across the United

Kingdom. However, it is widely accepted that the NRM only reveals part of the total picture. Some of the objectives identified in this strategy are therefore intended to improve our understanding of, and our response to, modern slavery in Northern Ireland.

Modern slavery in Northern Ireland – operational results

2.9 During the 2016/17 financial year, PSNI's Modern Slavery and Human Trafficking Unit (MSHTU) investigated 34 potential victims of modern slavery and human trafficking recovered in Northern Ireland who were referred to the NRM. This is a decrease when compared to the 59 potential victims who were referred into the NRM during 2015/16. However, MSHTU conducted 308 screening assessments in respect of suspected cases of human trafficking or modern slavery – an increase of 22% from 252 screening assessments in 2015/16. During the 2016/17 financial year, MSHTU made 10 arrests. A total of 27 searches were conducted and 52 safeguarding visits/non-warrant operations for labour and sexual exploitation. Four persons were charged with modern slavery/human trafficking and/or related offences. Nine persons were reported to the Public Prosecution Service for Northern Ireland (PPS) for modern slavery/human trafficking and/or related offences. Eleven decisions were issued by the PPS: 8 were for no prosecution and 3 were

for indictable prosecutions. Five persons were convicted of human trafficking.

2.10 During the 2017/18 financial year, MSHTU investigated 36 potential victims of modern slavery and human trafficking recovered in Northern Ireland who were referred to the NRM; a slight increase on the previous year's referral figures. MSHTU conducted 173 screening assessments in respect of suspected cases of human trafficking or modern slavery; whilst this is a significant decrease on the 2016/17 assessments, this reflects the adoption of a more targeted approach to screening assessments. During the 2017/18 financial year, MSHTU made eight arrests. A total of 22 searches were conducted and 59 safeguarding visits/non-warrant operations for labour and sexual exploitation. Six persons were charged with modern slavery/human trafficking and/or related offences. Two persons were reported to the Public Prosecution Service for Northern Ireland (PPS) for modern slavery/human trafficking and/or related offences. Eight decisions were issued by the PPS; 2 suspects were not prosecuted for any offence, 5 suspects were prosecuted for Human Trafficking offences, and 1 was prosecuted for another indictable offence. Two persons were convicted of human trafficking offences.

2.11 During the 2018/19 financial year, MSHTU investigated 59 potential victims of modern slavery and human trafficking recovered in Northern Ireland who were referred to the NRM; a significant increase on the previous year's referral figures. MSHTU conducted 148 screening assessments in respect of suspected cases of human trafficking or modern slavery. During the 2018/19 financial year, MSHTU made 11 arrests. A total of 15 searches were conducted and 74 safeguarding visits/non-warrant operations for labour and sexual exploitation. One person was charged with modern slavery/human trafficking and/or related offences. Three persons were reported to the Public Prosecution Service for Northern Ireland (PPS) for modern slavery/human trafficking and/or related offences. Thirteen decisions were issued by the PPS; 9 suspects were not prosecuted for any offence, 3 suspects were prosecuted for Human Trafficking offences, and 1 was prosecuted for another related indictable offence. Whilst not convicted of the offence of human trafficking, two persons who had been prosecuted for human trafficking offences were convicted of other serious offences.

Progress so far

2.12 The 2015 Act and the consequent introduction of new offences have resulted in greater focus and improved partnership-working in the fight to eradicate modern slavery and human trafficking. Since the Act

was introduced, much good work has taken place and is now embedded in our normal processes.

2.13 In particular, significant benefits have been derived from the decision to set up dedicated teams in the areas of law enforcement and prosecution. Specialism has resulted in increased expertise, and a developing body of case-work has led to improved learning opportunities. Through the Organised Crime Task Force's (OCTF) strategic partnership, a strong multi-agency response from organisations such as the PSNI, NCA, HM Revenue & Customs (HMRC), GLAA, UKBF, and UKIE has helped disrupt and apprehend those who seek to carry out these offences, and to recover victims. DoJ also benefits from close partnership-working with colleagues in the Home Office and the Scottish and Welsh devolved administrations, and with a wide range of valued partners from the voluntary and community sector.

2.14 Section 18 of the 2015 Act places a statutory duty on the Department to provide assistance and support to adult potential victims who have been referred, or who are about to be referred into the NRM for a decision as to whether they are a victim of modern slavery. Following a recent procurement exercise, the Department has again contracted Migrant Help and Belfast & Lisburn Women's Aid to provide

support and assistance to adult potential victims under Section 18. In cases where adult potential victims have a dependent child, an assessment of the needs of the child will be undertaken by the relevant Health and Social Care Trust (HSCT). During the 2016/17 financial year, four males and 16 females were supported through the contracts; during the 2017/18 year, 10 males and 17 females were supported; and during the 2018/19 year, 16 males and 22 females were supported.

2.15 Support and protection for child victims and potential victims are provided by HSC Trusts and are underpinned by a comprehensive framework of legislation, operational guidance and protocols for multi-agency work, including the recently revised "Working Arrangements for the Welfare and Safeguarding of Child Victims and Potential Child Victims of Human Trafficking and Modern Slavery." Other significant developments in protecting child victims include a dedicated facility, and the introduction of the Independent Guardian Scheme following the successful passage of secondary legislation.

2.16 Training in modern slavery and human trafficking has been a priority and there has been significant activity across a range of stakeholders including law enforcement, lawyers, prison officers, and health and social care staff. Education and awareness-raising across

relevant organisations and the community have been key and we wish to acknowledge the invaluable work carried out by non-Governmental organisations who have contributed greatly by leading on much of this work. However, more remains to be done and our current strategy places an increased focus on the development of a strategic response to training needs across relevant sectors, with the development of a Training Needs Analysis and Plan for Northern Ireland.

Turning the curve

2.17 This strategy acknowledges the substantial body of work that has been put in place to tackle modern slavery and that continues to be delivered operationally on a ‘business as usual’ basis. However our focus in developing this strategy has been on identifying and developing objectives and actions that are transformational in nature and that will enhance and add further value to the arrangements already in place.

Measures

2.18 The strategy describes what success will mean under the headings of Pursue, Protect and Prevent. We have identified a range of measures against each of the strategic priorities which will help to inform both our understanding of the nature of modern slavery in Northern Ireland and our response.

2.19 It is important to clarify that these measures, whilst valuable, are open to interpretation and so caution should be applied when using them as measures of effectiveness or ineffectiveness. For example, whilst an increase in the number of victims referred to the NRM could be interpreted as indicating an increase in the scale of modern slavery, it might equally be as a result of higher levels of awareness leading to increased identification of victims and reporting of suspected cases. However, over a longer period of time, if our actions are being effective, we would expect to see an eventual decline in referrals. Equally, since we are a small jurisdiction in terms of both geography and population, with relatively low numbers of victim referrals, the nature of an individual case in Northern Ireland can have a significant impact on how these referral figures fluctuate year by year, for example, where multiple victims are recovered in a single, large operation. For the same reasons, the nature of the offences encountered in Northern Ireland can also fluctuate from year to year, with more labour offences in one year and more sexual exploitation cases detected in another year. Similarly, the number of people charged with an offence or prosecuted and convicted might rise or fall depending on whether a large criminal gang has been successfully dismantled, or a small criminal gang which nonetheless had multiple victims, or indeed on the willingness of the victims involved to co-operate with criminal justice proceedings.

Disruption

2.20 In addition to criminal justice measures, disruptive actions are carried out by a range of agencies as part of a broader approach to successfully addressing the crime of modern slavery. A disruption has been achieved when intentional activity leads to an organised crime group or individual being unable to operate at their usual level of activity or where the risk posed is diminished for a period of time. This might be as a result of actions from a range of agencies such as the issue of HMRC tax demands, refusal of entry to the UK by UKIE, disqualification from directing a company, or many other regulatory interventions that disrupt harmful activities. The links between certain activities and modern slavery are also relevant: even where convictions are not possible, disruptive action taken can mean that it is more difficult for criminal gangs to carry out modern slavery offences and to enslave people easily.

Partnership

2.21 For each of the Pursue, Protect and Prevent priorities, partnership working has been central to all that has been achieved to date. Partnership-working is also ongoing to prepare for and respond to the policy implications of EU Exit. The EU justice and home affairs measures support actions and initiatives across the justice system including work to eradicate modern slavery. In the event of a deal, the UK will, in line with the Political Declaration, work with the EU to agree a justice and security partnership with a view to replicating as far as possible the existing measures. In the event of a no deal, older legal fall-back options exist for many of the measures although these are likely to be sub-optimal to the existing EU-based legal framework in terms of completeness, speed and cost.

2.22 The degree of commitment of all stakeholders to eradicating modern slavery and to working together to that end is acknowledged and valued. Partnership will continue to underpin all that we do to work together to deliver the objectives in this strategy.

This strategy:

- sets the strategic direction for 2019/20;
- provides focussed and shared strategic priorities and objectives;
- enhances the operational response to **PURSUE** and disrupt offenders and bring them to justice;
- puts the **PROTECTION** and needs of victims at the centre of our response;
- engages partners across key services, business, non-Governmental organisations and the wider public in **PREVENTING** modern slavery.
- is ambitious and challenging, but still achievable; and
- will contribute to our ultimate aim of ending modern slavery.

3. STRATEGY

NORTHERN IRELAND MODERN SLAVERY STRATEGY 2019-20

Equipping Northern Ireland to eradicate modern slavery.

PURSUE	PROTECT	PREVENT
Detecting, investigating, disrupting and prosecuting modern slavery offenders.	Reducing the harm caused by modern slavery by improved victim identification and support.	Reducing the threat of modern slavery by reducing vulnerability and demand and by raising awareness.
<p>← PARTNERSHIP AND COLLABORATION →</p>		

PURSUE: Detecting, investigating, disrupting and prosecuting modern slavery offenders.

Success in **PURSUE** will mean:

- victims of modern slavery identified and brought to safety;
- the prosecution and conviction of modern slavery offenders;
- the disruption of criminals and organised crime groups responsible for modern slavery.

We will measure:

- number of Modern Slavery/Human Trafficking investigations;
- number of PSNI screening assessments;
- number of victim referrals to NRM;
- number of people charged for modern slavery offence;
- number of people reported to PPS for modern slavery offence;
- prosecution and conviction figures, including offences linked to modern slavery;
- % of convictions resulting in an STPO or other ancillary order;
- monetary value of orders made under POCA.

Current capability and practice - Good progress has already been made against this strategic priority. In particular:

- robust legislation for Northern Ireland in place;
- arrangements in place to facilitate strategic and operational partnerships;
- PSNI now has a dedicated Modern Slavery and Human Trafficking Unit that leads PSNI response to modern slavery;
- all NRM referrals have a crime report raised and an investigation undertaken into possible offences of modern slavery;
- dedicated training for law enforcement has been developed, rolled out and mainstreamed: training for all PSNI officers is available through the eLearning National Centre for Applied Learning Technologies (NCALT) Modern Slavery module and MSHTU-delivered training is provided for all new PSNI recruits and new-to-role Detectives on Modern Slavery; officers within the PSNI MSHTU have received Modern Slavery training from the National College of Policing/National

Police Transformation Programme, in addition to training from South Wales Police, An Garda Síochána and Europol;

- a team of Senior Public Prosecutors are dedicated to modern slavery cases, all of which are dealt with by the PPS Serious Crime Unit (SCU);
- guidance has been provided to all prosecutors to assist in identifying potential victims;
- SCU prosecutors have attended UK training events specifically for investigators and prosecutors to ensure best practice; and Heads of Prosecution Authorities in UK have signed up to Prosecutors Commitments.

The objectives and actions that have been included below are intended to build on, reinforce and develop existing capability and practice in order to strengthen and improve our response to modern slavery under **PURSUE**.

Objective	We will	Mechanisms for delivery
An effective legislative framework (R1, R2, R3)	<ul style="list-style-type: none">- ensure that modern slavery legislation remains relevant and fit for purpose;- make full use of cross-Government tools, sanctions and the regulatory regime to disrupt offenders;- consider legislative proposals for specific organised crime offences.	<ul style="list-style-type: none">- consideration of Haughey review findings;- consideration of further legislative proposals and any required changes;- effective use of STPOs, employment rights through the Employment Agency Inspectorate in the Department for the Economy and through the Industrial Tribunals, Health and Safety powers and regulations, National Minimum Wage, GLAA powers and offences, local government etc. where appropriate as part of a “whole of Government” response;- DoJ review of organised crime legislation.

<p>An effective operational response (R1, R2)</p>	<ul style="list-style-type: none"> - strengthen partnerships to ensure a strong multi-agency response; - attack criminal finances; - draw on available resources for effective international collaboration; 	<ul style="list-style-type: none"> - Organised Crime Task Force; - Joint Agency Task Force; - PSNI-led multi-agency operations; - Prime Minister's Task Force; - consideration of HMICFRS review findings from Stolen Freedom: the policing response to modern slavery and human trafficking (England and Wales); - UK Prosecuting Authorities Group; - early engagement with PPS by law enforcement; - consideration of mechanism for information sharing between government agencies; - effective use of the full range of confiscation and forfeiture powers under the 2015 Act, POCA 2002 and the Criminal Finances Act 2017; - Joint Investigation Teams and alternative mechanisms for international co-operation; - Europol information exchange; - GLAA MOU with Workplace Rights Commission, RoI;
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	<ul style="list-style-type: none"> - continue to develop cyber capabilities to address modern slavery online. 	<ul style="list-style-type: none"> - development of bi-lateral links, etc.; - ongoing development work to address modern slavery on-line.
Effective learning and best practice across the criminal justice system (R1, R2)	<ul style="list-style-type: none"> - ensure delivery of effective training and learning for law enforcement, prosecutors and stakeholders across the justice system; - ensure ongoing learning and best practice from existing cases. 	<ul style="list-style-type: none"> - extended provision of South Wales Police Organised Crime Modern Slavery Senior Investigating Officers Course and any relevant new College of Policing courses; - identifying opportunities for shared learning with law enforcers and prosecutors from other jurisdictions; - work with Independent Anti-Slavery Commissioner to identify learning opportunities for stakeholders across the justice system; - consideration of cases, best practice and lessons learned at meeting of UK Prosecuting Authorities Group; - continuing annual PPS stakeholder events to update stakeholders on work completed and cases ongoing/concluded and to consult with stakeholders and support services on ideas for best practice;

	<ul style="list-style-type: none"> - continuation of PPS Serious Crime Unit case outcome reviews to identify good practice and/or lessons learned; - consideration of annual or bi-annual MSHTU and PPS Serious Crime Unit prosecutors workshop to review cases and discuss legislative interpretation and learning; - MSHTU Case Review and debriefing including identifying further lines of enquiry; - HSCB Regional Practice Network on Separated Children consideration of cases for learning and best practice; - HSCB Regional Adult Safeguarding Practice Learning Network consideration of cases for learning and best practice.
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PROTECT: Reducing the harm caused by modern slavery by improved victim identification and support.

Success in **PROTECT** will mean:

- more victims of modern slavery are identified;
- victims are provided with appropriate and effective support and protection to help them recover.

We will measure:

- number of victim referrals to NRM;
- number of re-victimised victim referrals to NRM (subject to system capability to provide data);
- number of non-NRM potential victims referred to NGOs for contact and advice (subject to agreement of the scheme);
- number of PSNI screening assessments;
- number of victims supported through the DoJ contract;
- number of victims supported on a discretionary basis under Section 18 (9);
- number of children, and young people in aftercare, supported by HSCTs and through the HSCB residential facility;
- number of children supported through the independent guardian scheme;
- number of modern slavery claims to the Criminal Injuries Compensation Scheme;
- training delivered to front line professionals.

Current capability and practice – protecting and supporting victims is at the centre of our response and robust arrangements are already in place to provide effective assistance and support. These include:

- victim support and protections enshrined in legislation;

- dedicated contracted provision addressing Trafficking Survivors Care Standards in place for support and assistance to victims of modern slavery;
- strong operational links between statutory providers as well as with non-statutory support providers;
- roll out of awareness training across a range of front-line professionals;
- statutory provision regarding secondary victimisation; access to special measures in court; and a statutory defence for victims who have been compelled to commit certain offences;
- HSCT interventions and dedicated residential facility for separated children and child victims of modern slavery.

In addition to the current capability and practice, the objectives and actions identified below are intended to improve victim identification and enhance our capacity to support and assist victims of modern slavery under **PROTECT**.

Objective	We will	Mechanisms for delivery
Proactively identify victims of modern slavery (R1, R2, R3)	<ul style="list-style-type: none"> - ensure that effective mechanisms are in place to identify and report suspected cases of modern slavery; 	<ul style="list-style-type: none"> - effective NRM referrals supported by PSNI monitoring and quality assurance; - delivery of workshops to cascade best practice for First Responders; - implementation of the Duty to Notify provisions (subject to an available legislative vehicle) taking into account UK-wide NRM reforms; - development of statutory guidance on identifying victims (aligned to implementation of the Duty to Notify provisions); - clear internal agency pathways for reporting; - promotion of the Modern Slavery Helpline;

	<ul style="list-style-type: none"> - ensure that relevant sectors and frontline professionals are equipped with the skills and knowledge to recognise and report suspected cases of modern slavery. 	<ul style="list-style-type: none"> - development of multi-agency Training Needs Analysis and Training Plan for NI; - development of tailored and effective training standards, through the UK Modern Slavery Training Delivery Group; - strategic roll-out of training delivery; - up-to-date and effective operational guidance in place.
Provide victims of modern slavery with appropriate and effective support (R1, R2, R3)	<ul style="list-style-type: none"> - ensure that effective NRM arrangements are in place; - ensure the provision of support and assistance to victims. 	<ul style="list-style-type: none"> - ongoing work with Home Office to reform NRM and support arrangements; - NRM training workshop for First Responders; - re-procurement of DoJ contract for support services; - consideration of PSNI referrals to NGOs to build trust with non-NRM potential victims; - establishment of links to support reintegration of victims into society, both in the UK and in countries of origin; - available avenues for victim reparation and compensation; - effective use of “discretionary leave to remain” arrangements;

		<ul style="list-style-type: none"> - effective use of Special Measures provisions to enable victims to provide best evidence at court; - legal aid available to victims of slavery and trafficking, as appropriate; - provision of appropriate information and support for victims engaging in the criminal justice process via the Victim Witness Care Unit (VWCU); - delivery of appropriate training to Prosecutors and Prosecuting Counsel to support vulnerable victims and to ensure compliance with the Victim Charter, taking account of the Attorney General's Human Rights Guidance for the PPS; - DoJ will explore the potential for support available to adult potential victims of modern slavery under the DoJ support contract to be provided for an extended recovery and reflection period, subject to available resources.
Provide specialist support to child victims of modern slavery that recognises their unique vulnerabilities	<ul style="list-style-type: none"> - ensure that an Independent Guardian service is in place to assist, represent and support separated or trafficked children and victims of Modern Slavery; 	<ul style="list-style-type: none"> - procurement of Independent Guardian service for separated and trafficked children;

(R1, R2, R3)	<ul style="list-style-type: none"> - ensure appropriate accommodation options are available to meet the needs of child victims; - ensure that appropriate guidance is in place for HSC Trust staff and PSNI on actions to take when they encounter a child who they suspect may be a victim of human trafficking or modern slavery. 	<ul style="list-style-type: none"> - analysis of availability and suitability of current care placement provision and post care accommodation for child victims and those leaving care will be kept under review by Health & Social Care Board in consultation with HSC Trusts and the Regional Practice Network; - development of guidance on working arrangements for Trust staff and PSNI officers when they encounter possible child victims of human trafficking or modern slavery.
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PREVENT: Reducing the threat of modern slavery by reducing vulnerability and demand and by raising awareness.

Success in **PREVENT** will mean:

- fewer offenders will engage in modern slavery crime;
- fewer victims will become entrapped by modern slavery;
- reduced demand through increased awareness.

We will measure:

- media reporting of operational successes;
- number of awareness sessions delivered to each target audience;
- victim referrals and support figures;
- calls to the Modern Slavery Helpline;
- number of MSHT crimes recorded;
- crime survey figures on public awareness.

Current capability and practice – Prevention is an increasingly important focus for action in combating modern slavery and human trafficking. To date, we have:

- delivered a programme of awareness-raising initiatives to equip the general public to recognise suspicious signs and to respond safely and appropriately;
- provided specific training and awareness to equip front-line professionals to recognise and respond to potential cases of trafficking and slavery;
- engaged with at-risk communities and key sectors to reduce vulnerabilities;
- commenced Slavery and Trafficking Prevention Orders (STPOs) under the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.

In addition to the current capability and practice, the objectives and actions below are intended to strengthen and improve our response to modern slavery under **PREVENT**.

Objective	We will	Mechanisms for delivery
Reduce vulnerability to exploitation and re-exploitation (R1, R2, R3)	<ul style="list-style-type: none"> - engage with at-risk communities; - support / promote initiatives to educate and provide rights-based information. 	<ul style="list-style-type: none"> - training / awareness with homeless sector; - Engagement Group; - Sex Worker Liaison Group; - strengthen links with PCSPs and local government; - Engagement Group initiatives; - Freedom Acts #Five Campaign; - engagement / information through intercultural programmes; - use of on-line social media to mitigate against vulnerability to trafficking and modern slavery.
Strengthen cross-sector resilience against modern slavery (R1, R2, R3)	<ul style="list-style-type: none"> - increase engagement with relevant sectors to raise awareness of risk and promote good practice. 	<ul style="list-style-type: none"> - engagement across social care and health sectors including via the HSCB-led Regional Practice Network on Separated Children; - engagement with agri-food sector; - ongoing liaison between IASC and NILGA on NILGA guidance for councils; - development and delivery of training and awareness initiatives; - ongoing delivery of Stronger Together initiative; - proactive engagement with relevant trade press;

		<ul style="list-style-type: none"> - Training Needs Analysis to consider awareness of procurement issues; - training for public sector procurement leads in respect of transparency in supply chains.
Raise public awareness to reduce demand and increase reporting (R, R2, R3)	<ul style="list-style-type: none"> - proactive media engagement on presence of modern slavery and on operational successes; - development and delivery of public awareness materials. 	<ul style="list-style-type: none"> - development of OCTF Communications Group and Communications Plan; - proactive agency engagement with media and social media; - strengthened links with partner organisations; - refresh of on-line public information on modern slavery/human trafficking; - development and strategic dissemination of public awareness materials; - ongoing delivery of training / awareness sessions; - maintaining presence at high profile public events.

4. COMMITMENTS DELIVERY OVERVIEW:

Appendix 1

YEARS		
	2019/20	2020/21
PURSUE		
legislative framework	<ul style="list-style-type: none"> - ongoing use of multi-agency sanctions – case by case basis; - consideration of further legislative proposals (including Haughey review); - consideration of further legislative proposals and any required changes; - DoJ review of organised crime legislation. 	<ul style="list-style-type: none"> - ongoing use of multi-agency sanctions – case by case basis. - development of legislative options, if required.
operational response	<ul style="list-style-type: none"> - ongoing multi-agency response – case by case basis; - ongoing use of mechanisms for international co-operation; - development of cyber capabilities; - use of on-line social media to mitigate against vulnerability to trafficking and modern 	<ul style="list-style-type: none"> - ongoing multi-agency response – case by case basis; - ongoing use of mechanisms for international co-operation;

	<p>slavery;</p> <ul style="list-style-type: none"> - ongoing use of forfeiture and confiscation powers – case by case basis; - consideration of HMICFRS review findings from Stolen Freedom: the policing response to modern slavery and human trafficking (England and Wales); - consideration of mechanism for information sharing between government agencies. 	<ul style="list-style-type: none"> - ongoing use of forfeiture and confiscation powers – case by case basis; - consideration of mechanism for information sharing between government agencies.
learning and best practice	<ul style="list-style-type: none"> - ongoing training; - extended provision of South Wales Police Organised Crime Modern Slavery Senior Investigating Officers Course and any relevant new College of Policing courses; - work with Independent Anti-Slavery Commissioner to identify learning opportunities for stakeholders across the justice system; - ongoing PPS liaison with other organisations regarding best practice. 	<ul style="list-style-type: none"> - ongoing PPS liaison with other organisations regarding best practice.

	YEARS	
	2019/20	2020/21
PROTECT		
Identify victims of modern slavery	<ul style="list-style-type: none"> - ongoing policy work on Duty to Notify provisions; - multi-agency engagement on reporting pathways; - ongoing promotion of the Modern Slavery Helpline; - continued delivery of training and awareness sessions to relevant frontline professionals; - development of tailored and standardised training with UK Modern Slavery Training Delivery Group; - development of Training Needs Analysis and Training Plan; 	<ul style="list-style-type: none"> - implementation of Duty to Notify legislation and statutory guidance subject to an available legislative vehicle; - ongoing promotion of the Modern Slavery Helpline; - start strategic roll-out of Training Plan.

	<ul style="list-style-type: none"> - completion of operational guidance on arrangements for working with adult victims of modern slavery. 	
Appropriate and effective support	<ul style="list-style-type: none"> - ongoing policy work with Home Office on NRM reform; - delivery of appropriate training to Prosecutors and Prosecuting Counsel to support vulnerable victims and to ensure compliance with the Victim Charter; - delivery of training for NRM First Responders; - establishment of links to support reintegration of victims into society, both in the UK and in countries of origin; - support contract <ul style="list-style-type: none"> - June 18 – award of contract; - 1 Nov 18 – new contract commences. - consideration of partnership-working with NGOs to build trust with non-NRM potential victims; - consideration of potential to extend recovery 	<ul style="list-style-type: none"> - delivery of changes to NRM arrangements in line with NRM reform programme;

	and reflection period, subject to available resources.	and reflection period, subject to available resources.
Specialist support for child victims	<ul style="list-style-type: none"> - ongoing co-operation between PSNI and HSC Trusts to identify and respond to the needs of potential child victims of modern slavery; - roll-out of Independent Guardian service to assist, represent and support separated or trafficked children and victims of modern slavery; - analysis of availability and suitability of current care placement provision and post care accommodation for child victims and those leaving care will be kept under review by Health & Social Care Board in consultation with HSC Trusts and the Regional Practice Network; - implementation by Trusts and PSNI of guidance on working arrangements that should be followed by HSC Trust staff and PSNI officers when they encounter possible child victims of human trafficking or modern slavery. 	<ul style="list-style-type: none"> - analysis of availability and suitability of current care placement provision and post care accommodation for child victims and those leaving care will be kept under review by Health & Social Care Board in consultation with HSC Trusts and the Regional Practice Network;

YEARS		
	2019/20	2020/21
PREVENT		
Reduce vulnerability to exploitation	<ul style="list-style-type: none"> - ongoing work with or supporting Engagement Group partners; - promotion of Freedom Acts #Five Campaign; - engagement with homeless sector to raise awareness of risk and of indicators and reporting; - use of on-line social media to mitigate against vulnerability to trafficking and modern slavery. 	<ul style="list-style-type: none"> - ongoing work with or supporting Engagement Group partners; - use of on-line social media to mitigate against vulnerability to trafficking and modern slavery.
Strengthen resilience against modern slavery	<ul style="list-style-type: none"> - engagement with relevant sectors, and identification of further sectors for engagement; - development and delivery of training and awareness initiatives; - ongoing delivery of Stronger Together 	

	<p>initiative;</p> <ul style="list-style-type: none"> - continuing engagement with trade press; - training for public sector procurement leads in respect of transparency in supply chains. 	
Raise public awareness	<ul style="list-style-type: none"> - establishment of OCTF communications group; - development and delivery of a communications plan; - development of social media links; - refresh of on-line public information on modern slavery/human trafficking; - ongoing media engagement; - ongoing training and awareness sessions / work in schools etc. by DoJ and Engagement Group partners. 	