



Department of
Justice

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NORTHERN IRELAND
MODERN SLAVERY & HUMAN TRAFFICKING STRATEGY
2024 – 2027

July 2024

FOREWORD

I am pleased to publish the 2024-2027 Strategy to help to address the issue of Modern Slavery and Human Trafficking (MSHT).

Modern slavery and human trafficking are brutal and appalling crimes that affect millions of people worldwide, including here in Northern Ireland. It is an affront to our values as a society and undermines the fundamental principles of human rights and dignity.

Modern slavery and human trafficking victims – each person, counts. We must care about the problem and have methods to pursue offenders, protect victims and prevent exploitation. We can all help with this – know the signs and report concerns. This Strategy is a call to action.

I am proud to introduce this three-year MSHT Strategy for Northern Ireland, a comprehensive plan to address the issue of modern slavery in Northern Ireland over the next three years. It is the result of extensive collaboration between Government, civil society organisations, and the private sector and reflects our shared commitment to combatting MSHT.

This Strategy is a critical step forward in our efforts to prevent and respond to MSHT. It sets out clear objectives, commitments/actions and measures that go some way to address the underlying causes, while building on the achievements of our previous strategies.

Previously a Strategy was produced each year, but the longer-term approach set out in this Strategy allows us to take a more sustained and strategic approach to the issue, which is essential if we are to make real progress in combatting MSHT. By working together over the next three years, we can make a significant difference in the lives of those affected.

I would like to take this opportunity to thank all those who have contributed to the development of this Strategy. I would also like to



encourage all stakeholders to engage with the Strategy, to work together to achieve the objectives, and to report any instances of MSHT.

Together, we can make a real difference in the fight against MSHT and create a society where all individuals are free to live their lives without fear of exploitation.

A handwritten signature in black ink that reads "Naomi Long". The signature is written in a cursive style with a period at the end.

Naomi Long MLA
Minister of Justice

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SECTION 1

UNDERSTANDING THE PROBLEM

- 1.1 Modern slavery is a term often used to describe offences of human trafficking and also of slavery, servitude and forced or compulsory labour. The latter covers situations in which people are coerced to work, sometimes through the use of violence or intimidation, or sometimes 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. As with slavery and forced labour, in human trafficking an individual may be exploited through the use of force, 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.
- 1.2 Northern Ireland is not immune to the issue of modern slavery, and as such a longer-term MSHT Strategy can be a useful tool to address the problem. A Strategy for Northern Ireland should be informed by the specific context of the region and address the unique challenges facing the area.
- 1.3 One of the key challenges facing Northern Ireland in relation to MSHT is the legacy of conflict and its impact on social and economic development. The legacy of conflict has left a significant number of people in Northern Ireland vulnerable to exploitation, particularly in the areas of criminal, sexual and labour exploitation.
- 1.4 Another challenge is the rural nature of some parts of Northern Ireland, which can make it difficult to identify cases of MSHT. There is also a lack of awareness of the issue among the general public and frontline professionals.
- 1.5 The rising cost of living, such as housing, food and energy can contribute to a vulnerable population that is at greater risk of exploitation and modern

slavery. In many cases, MSHT involves individuals being forced to work without pay or under conditions of extreme duress, such as debt bondage or threats of violence. The current cost of living crisis could lead to the vulnerable in society struggling to make ends meet making them more likely to accept job offers that involve low pay or poor working conditions.

- 1.6 MSHT is often considered a hidden crime because it can be difficult to detect and identify. The latest available figures¹ show that 462 potential victims were identified in Northern Ireland in 2023. 290 were adults, 110 were children and 62 were of an unknown age. 154 potential victims were female (with cases mainly relating to suspected sexual exploitation and labour exploitation) while 308 were male (with cases generally linked to labour exploitation). Of the 462 potential victims identified, more than 61% had Eritrean or Somali nationality.
- 1.7 Of the potential victims identified in Northern Ireland, approximately 4% were exploited solely within the UK. By contrast, the UK as a whole reported more than 49% of potential victims being exploited solely within the UK. The vast majority of the potential victims identified in Northern Ireland were of a nationality other than the UK, with only 3 identified potential victims being UK nationals. In the UK as a whole, approximately 25% of all referrals related to UK nationals, the most common nationality referred in 2023 and the highest for any year since the NRM began.
- 1.8 Whilst approximately 23% of potential victims identified in Northern Ireland in 2023 were children, the UK as a whole observed approximately 44% of referrals involving children, the highest number on record. Of the 110 potential child victims identified, 1 child was a UK national and a total of 3 children were exploited locally. By contrast, in the UK as a whole 4,589 children were identified as being exploited solely within the UK, representing approximately 61% of all potential child victims identified. The Department will explore this differential to better understand the broader picture of child exploitation in Northern Ireland.

¹ [National Referral Mechanism statistics, Home Office, last updated 9 May 2024](#)

- 1.9 While exploitation of vulnerable individuals by local people is not new, it is being increasingly exposed and identified as a form of MSHT. Recent high-profile cases, which have led to at least one conviction, have demonstrated how local young vulnerable women have been exploited and trafficked for commercial gain by unscrupulous men. This is an emerging pattern where vulnerable children and young adults, both within and beyond the care sector, are being exploited criminally, sexually and for other purposes by ‘trusted’ adults in their community. Addressing these forms of exploitation will be a key priority of this three-year Strategy.
- 1.10 MSHT takes many forms and guises and is very prevalent across our society. The numbers of survivors of MSHT had steadily increased in previous years, the statistics for 2022 showed the biggest increase in individuals being supported since records began. Despite a reduction in referrals in Northern Ireland from 547 in 2022, the number of referrals remain consistently high compared to previous years.

CHILD CRIMINAL EXPLOITATION

- 1.11 The Child Protection Senior Officials Group (CPSOG) provides cross-Departmental strategic direction on existing and emerging child protection issues. CPSOG is chaired by the Department of Health and the Department of Justice is a core member of the Group. In 2023, CPSOG agreed a two-year action plan to address child criminal exploitation (CCE) in Northern Ireland.
- 1.12 The Executive Programme on Paramilitarism and Organised Crime (EPPOC) has been at the forefront in Northern Ireland of developing evidence-based understanding and service provision for young people at risk of, and experiencing, child criminal exploitation. The cross-Departmental CCE action plan, jointly led by Departments of Justice and Health, builds on the work of EPPOC to create a system wide response to child exploitation. The ultimate aim is to improve the wellbeing of children and young people

experiencing or at risk of criminal exploitation and to improve their longer-term life chances.

- 1.13 The agreed actions for Justice include an action, in line with this Strategy, to increase awareness of offences as they relate to children in the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act NI 2015 and whether it is in the child's best interests to make a referral into the National Referral Mechanism.
- 1.14 The CCE action plan also includes an action to maximise existing Modern Slavery and Human Trafficking legislation to prosecute those who exploit children, and where appropriate, confiscate the criminal assets of perpetrators to help to undermine the economic motivation that fuels the exploitation of children.
- 1.15 All of this work is closely aligned to other Executive Strategies including the Children and Young People's Strategy 2020-2030 (2021)², the Child Poverty Strategy (2016)³, the Anti-Poverty Strategy (under development)⁴ and the Ending Violence Against Women & Girls Strategic Framework (under development)⁵.

² [Children and Young People's Strategy 2020-2030, 2021](#)

³ [Child Poverty Strategy, 2016](#)

⁴ [Anti-Poverty Strategy, under development](#)

⁵ [Ending Violence Against Women & Girls Strategic Framework, under development.](#)

STRATEGIC CONTEXT

- 1.16 Section 12 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015⁶ (the 2015 Act) required the Department of Justice (DoJ) to publish an annual MSHT Strategy. Following the introduction of the Justice (Sexual Offences and Trafficking Victims) Act (Northern Ireland) 2022⁷, the provision to publish an annual Strategy has been substituted with “at least once every 3 years.”
- 1.17 This Strategy will help tackle modern slavery and its underlying causes in a sustained and comprehensive manner. Modern slavery is a complex and pervasive issue that affects millions of people around the world and addressing it requires a co-ordinated and long-term approach.
- 1.18 Delivery of commitments from the 2021-2022 Strategy continued throughout 2023, through Departmental work and engagement with key stakeholders. It is acknowledged that some of the commitments and work streams previously identified will necessarily roll over into this new three-year Strategy. The 2024-2027 Strategy will build on progress made throughout previous years while identifying commitments for a longer-term strategic direction.
- 1.19 This three-year Strategy will help to:
- Prevent and address modern slavery by identifying the root causes and implementing targeted interventions, a longer-term Strategy can help prevent people from becoming victims and provide support for those who are already affected.
 - Describe how we strengthen legal frameworks and improve law enforcement to ensure that perpetrators of this heinous crime are held accountable.
 - Promote responsible business practices by encouraging businesses to adopt practices that reduce the risk of modern slavery in their operations and supply chains.

⁶ [Human Trafficking and Exploitation \(Criminal Justice and Support for Victims\) Act \(Northern Ireland\) 2015](#)

⁷ [Justice \(Sexual Offences and Trafficking Victims\) Act \(Northern Ireland\) 2022](#)

- Raise public awareness and encourage reporting, which is crucial for identifying victims and prosecuting those who take advantage of the vulnerable in today's society.
- Ensure sustained progress over time and ensure that efforts to combat MSHT are not undermined by short term priorities.

1.20 Overall, this three-year Strategy will create a sustainable and co-ordinated approach to combat MSHT, which is essential for protecting the rights and dignity of vulnerable individuals and promoting a more just and equitable society.

OUR STATUTORY RESPONSIBILITIES

1.21 Section 12 of the 2015 Act requires the Strategy to cover a number of specific areas:

1. Arrangements for co-operation between relevant organisations in dealing with relevant offences or the victims of such offences.
2. Provision as to the training and equipment of those involved in investigating or prosecuting relevant offences or dealing with the victims of such offences.
3. Provisions aimed at raising awareness of the rights and entitlements of victims of such offences.

1.22 In moving to a three-year Strategy, DoJ considers that a longer-term approach, combined with an annual progress report would provide an appropriate and proportionate level of assurance that we can deliver on a longer-term vision while also responding quickly to a changing environment.

1.23 This requires a sustained commitment from all stakeholders and a willingness to address the underlying cause of the issue. By developing a comprehensive plan, establishing monitoring and evaluation mechanisms, engaging with stakeholders, and communicating the Strategy, progress can be sustained over a longer period of time.

DEVELOPMENT OF THIS STRATEGY

1.24 This Strategy builds on the significant work that has been delivered through the previous 4 strategies and action plans. As per the 2021-2022 Strategy the overall aim remains to '*Equip Northern Ireland to identify and eradicate modern slavery and human trafficking.*' This is an enduring aim and is at the heart of the Strategy.

1.25 To deliver that aim, the focus of the Strategy follows strands set in previous strategies under the three Ps, **Pursue**, **Protect** and **Prevent**:

Pursue – to enhance the operational response to pursue and disrupt offenders ensuring they are brought to justice.

Protect – ensuring that all victims of modern slavery and human trafficking are provided with an adequate level of protection and support.

Prevent – through engagement, training and awareness raising across key services, public and private sector organisations and the wider public in preventing modern slavery.

1.26 Partnership is key in ensuring the three strands of the Strategy best equip Northern Ireland to tackle this heinous crime. The degree of commitment of all stakeholders to eradicating modern slavery and to working together is greatly valued and partnership working will continue to underpin all that we do to work together to deliver the objectives of this Strategy.

1.27 This Strategy has been developed through round table discussions with key partners across Government, law enforcement and non-Government organisations (NGOs). The MSHT subgroup of the Organised Crime Task Force has also assisted in its development.

- 1.28 The Strategy is consistent with the wider Organised Crime Strategy for Northern Ireland 2021-2024. The Organised Crime Strategy identifies tackling MSHT as a key priority and recognises the links it can have with other aspects of organised criminality.
- 1.29 The Strategy is also informed by comments made by a number of influencing bodies including recommendations made by the Independent Anti-Slavery Commissioner⁸, the Criminal Justice Inspection Northern Ireland Inspection Report on Modern Slavery and Human Trafficking 2020⁹, and the Council of Europe GRETA Evaluation Report (Third Evaluation Round) published in October 2021¹⁰. These strategic recommendations and actions have been reflected in the Strategy action plan.
- 1.30 On 18 October 2022 the Department launched a public consultation seeking views from the public and key stakeholders on a new three-year Strategy. The public consultation closed on 10 January 2023. Comments provided through this public consultation have been considered and have helped to shape the final version of the objectives/commitments and actions found within this Strategy. These will be kept under review on an annual basis for the duration of this Strategy.

⁸ [Independent Anti-Slavery Commissioner Annual Report 2021-2022](#)

⁹ [Criminal Justice Inspection Northern Ireland, Modern Slavery and Human Trafficking, 2020](#)

¹⁰ [Council of Europe GRETA Evaluation Report \(Third Evaluation Round\) United Kingdom, 2021](#)

OTHER RELEVANT CONSIDERATIONS

LEGISLATIVE CHANGES TO THE NATIONAL REFERRAL MECHANISM

- 1.31 On the 6 July 2021 the Nationality and Borders Act was introduced in the UK Parliament and received Royal Assent on the 28 April 2022. The Act includes provisions for streamlining asylum processes, cracking down on illegal immigration and tackling people smuggling. Smuggling has links to MSHT as it is often the case that smuggling can lead to individuals being trafficked or enslaved due to their vulnerabilities.
- 1.32 The Nationality and Borders Act 2022¹¹ is reserved legislation. This means areas of law that are not devolved to the Northern Ireland Assembly and remain under the authority of the UK Parliament.
- 1.33 In February 2023, changes to reasonable grounds (RG) decisions, found under section 60 of the Nationality and Borders Act 2022, came into force. This changed the decision-making threshold from ‘may be’ to ‘is’. Previously, an RG decision was made on the assumption that there were reasonable grounds to believe an individual **may be** a victim of modern slavery. Now, the decision is made based on whether there are reasonable grounds to believe an individual **is** a victim of modern slavery.
- 1.34 Evidence of ‘objective factors’ must be provided that someone referred to the NRM **is** a potential victim. This evidence may include:
- a. **Indicators of Modern Slavery**
Are there specifics included in the referral?
 - b. **Travel Records**
Is there confirmation, for example, that the individual was in a country where the claim is centred? However, travel records, without some other specific evidence, will not usually be sufficient to meet the

¹¹ [Nationality and Borders Act 2022](#)

reasonable grounds threshold.

c. **Added Vulnerability**

Is the victim in a demographic known to be particularly vulnerable to Modern Slavery such as children or those whose age of maturity or developmental stage is that of a child? Does the victim present with vulnerabilities?

d. **Witness Statements**

Is there supporting evidence from an independent witness, e.g. a police officer? A detailed explanation of why the individual has been referred. Additional evidence or information relating to the person's exploitation and any evidence raised regarding the credibility of the account.

Evidence against any suspect that can be considered.

e. **Views of trusted third parties other than the Police**

For instance, Adult or Child Safeguarding Services or Independent Child Trafficking Guardians (where appointed).

- 1.35 Amended Home Office non-statutory guidance on the changes to making a RG decision can be accessed [here](#) or via the following link:
<https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims#full-publication-update-history>

TRANSPARENCY IN SUPPLY CHAINS (TISC)

- 1.36 The UK Government (UKG) plan to make additional changes to section 54 of the Modern Slavery Act 2015¹² in relation to Transparency in Supply Chains (TISC) when Parliamentary time allows.

- 1.37 The additional measures that the UKG plan to legislate for include:

1. reporting on specific topics;
2. publishing the Modern Slavery Statement on a public registry;
3. setting a deadline for submitting a statement annually;

¹² [Modern Slavery Act 2015](#)

4. extending the requirement to publish a statement to public sector organisations with a turnover of over £36 million; and
 5. the introduction of financial penalties for those that do not publish a slavery statement.
- 1.38 The Department continue to engage with organisations to raise awareness of their responsibilities in relation to TISC and the measures the UKG plan to legislate for.
- 1.39 Guidance on developing a Modern Slavery Statement for your organisation can be downloaded [here](#) or via the following link:
<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>
- 1.40 British Standards Institution (BSI) have also published a pioneering national standard, giving organisations guidance on how to manage slavery risks in their operations, supply chains and the wider operating environment. BS25700¹³ provides organisations with guidance for addressing the risk of modern slavery, including prevention, identification, response, remediation, mitigation and reporting. The standard is seen as a useful tool for all businesses irrespective of whether they meet the threshold limit of £36million in developing a holistic approach to addressing modern slavery within an organisation. The standard is free for anyone to download and can be accessed [here](#) or via the following link:
<https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/bs-25700-organizational-responses-to-modern-slavery/>

¹³ [British Standards Institution, BS25700 - Organizational responses to modern slavery](#)

SECTION 2

OBJECTIVES & KEY COMMITMENTS/ACTIONS TO ACHIEVE THESE

MODERN SLAVERY & HUMAN TRAFFICKING STRATEGY

Equipping Northern Ireland to identify and eradicate modern slavery and human trafficking

PURSUE	PROTECT	PREVENT
Detect, investigate, disrupt and prosecute modern slavery offenders.	Reduce the harm caused by modern slavery by improved adult and child victim identification and support.	Reduce the threat of modern slavery by reducing vulnerability and demand and by raising awareness.

← **PARTNERSHIP AND COLLABORATION** →

Strand 1 - PURSUE: Detecting, investigating, disrupting and prosecuting modern slavery and human trafficking (MSHT) offenders.

Success in **PURSUE** will mean:

- adult and child victims and survivors of MSHT identified and brought to safety;
- the prosecution and conviction of MSHT offenders;
- imposition of slavery and trafficking prevention orders following conviction; and
- the disruption of criminals and organised crime groups responsible for MSHT.

We will measure:

- number of MSHT investigations;
- number of PSNI screening assessments;
- number of people charged for MSHT offences;
- number of people reported to PPS for MSHT offences;
- prosecution and conviction figures, including offences linked to MSHT;
- percentage of convictions resulting in a slavery and trafficking prevention order or other ancillary order; and
- monetary value of orders made under Proceeds of Crimes Act (POCA).

PURSUE

Objective	Commitments / Actions	Measures	Responsible	Progress to date (Apr 24)
<p>Objective 1.1 To ensure that modern slavery legislation is used effectively and remains relevant and fit for purpose.</p>	<p>Ensure there is effective implementation of existing and new regulatory tools to disrupt and pursue offenders on a case-by-case basis including:</p> <ul style="list-style-type: none"> - The introduction of Duty to Notify (subject to the legislative process). - The introduction of Slavery Trafficking Risk Orders (STRO) (subject to the legislative process) (CJINI Operational Recommendation 1). - Engagement with key stakeholders to ensure employment rights are being adhered to and breaches investigated including working in collaboration with GLAA to ensure we are maximising all available powers. 	<p>Duty to Notify introduced. STROs introduced. Number of STROs. Number of STPOs. Number of referrals to PPS. Number of convictions.</p>	<p>DoJ</p>	<p>Work is underway to develop legislation in relation to STROs and Duty to Notify. Introduction of new legislation will be subject to the renewed legislative process, however DoJ will prioritise this commitment.</p>
	<p>Consult on the requirement for jury directions to be given in MSHT offence cases (CJINI Strategic Recommendation 3).</p>	<p>Develop proposals for jury directions in MSHT cases.</p>	<p>DoJ</p>	<p>DoJ are considering policy options to progress this action and will require a suitable legislative vehicle.</p>
	<p>Review of the use of Section 22 defence to protect vulnerable victims – this must be victim-centred in approach and include survivors’ experiences as part of</p>	<p>Review carried out.</p>	<p>DoJ/PPS/PSNI</p>	<p>PSNI is preparing a Section 22 Strategy document, to include operational guidance and an aide memoire for investigators. Guidance</p>

Objective	Commitments / Actions	Measures	Responsible	Progress to date (Apr 24)
	the process (CJINI Operational Recommendation 2).			<p>is live and available for all officers to use.</p> <p>The PPS review of the use of Section 22 defence has been completed. A Staff Instruction in relation to CSE was developed and launched with an accompanying training video in 2023. The training provides practical and legal guidance where an individual has been a victim or is at risk. Prosecutors were given guidance as to how to signpost CSE victims, or potential victims, to the police to protect and prevent further harm where possible.</p>
	Consider the options for expunging convictions for MSHT victims who have been unfairly prosecuted following forced exploitation / prostitution.	Commission research on expunging convictions.	DoJ	DoJ are considering options for expunging convictions for MSHT victims and will continue to engage with research partners on the most appropriate way forward.

Objective	Commitments / Actions	Measures	Responsible	Progress to date (Apr 24)
Objective 1.2 Ensure effective operational response.	Improving and enhancing multi-sector collaboration in assessing and responding to emerging threats of MSHT through enhanced partnership working with statutory agencies and community/voluntary sector organisations.	Number of victim referrals to National Referral Mechanism (NRM). Extent of engagement through OCTF MSHT Sub-Group.	DoJ	In 2023 N. Ireland saw 462 referrals to the NRM. Whilst this reflects a drop from 547 in 2022, the numbers remain high compared to previous years. DoJ facilitated 3 NGO Engagement Forum meetings and 2 OCTF MSHT Sub-Group meetings across 2023 to share key information and review emerging threats with key partners.
	Facilitate and support continued early engagement between Public Prosecution Service (PPS) and law enforcement in all cases that have a MSHT element.	Number of referrals to PPS from PSNI.	PPS/PSNI	Engagement between PSNI Modern Slavery and Human Trafficking Unit (MSHTU) and PPS designated serious crime prosecutors is ongoing. In 2022/23, 3 persons were prosecuted for human trafficking and exploitation offences and 4 persons convicted. In all cases early engagement has been facilitated and supported. Figures for 2023/24 will be included in year 1 progress update.
	Support and enhance the pursue response by proactive planning and co-ordination across MSHT and Public Protection Branch.	Number of CCE/CSE referrals to the NRM, charges linked to MSHT.	DoJ/PSNI	There is ongoing engagement between PSNI MSHTU, Public Protection Branch and the wider organisation around collaborative working. In NI in 2023, 2 children were referred to the NRM having been

				exploited locally compared to a UK total of 4589. Work is ongoing to understand the differential in referrals in NI for CCE/CSE compared to the UK as a whole.
	Support the further development of effective police engagement with victims using a trauma informed approach in obtaining evidential material.	Number of training sessions provided on a trauma informed approach. Number of front-line police officers trained to apply a trauma-informed approach.	PSNI	PSNI Protect officers to collaborate with Crime Training colleagues to develop a trauma informed approach in obtaining evidential material and ensuring best practices. Police interactions with victims will be governed by the Victim Charter and will be completed by specialist trained detectives.
	Ensure that law enforcement partners are fully aware of and utilise the full range of confiscation and forfeiture powers available under the 2015 Act, Proceeds of Crime Act (POCA) 2002 and the Criminal Finances Act 2017 to target criminality linked to MSHT.	Monetary value of orders made under POCA.	PSNI	To be progressed.
	Ensure that resources are utilised for effective collaboration, where accessible, including partnership working with cross border, national and international law enforcement partners.	Number of cases where partnership working was required-improved outcomes.	PSNI DOJ Policy leads in other administrations	Partnership working has been observed across a number of operations, including collaboration with UK Border Force, National Crime Agency, Harbour Police and An Garda Síochána. A summary of operations will be included in year 1 progress update.

	Review of the effectiveness of existing cyber tools available to law enforcement agencies in detecting and pursuing MSHT offenders.	Interventions linked to Traffic Jam software.	PSNI DOJ	Investigators utilise Traffic Jam, Experian Investigator, BIN checks and Landweb to support investigations and intelligence gathering.
	Monitor UK plans for the introduction of a Single Enforcement Body (SEB) and assess impact for Northern Ireland.	Ongoing engagement with Home Office to ensure guidance is developed for Northern Ireland following proposed SEB introduction.	DOJ	UK Government plans to introduce a Single Enforcement Body are currently on hold. DoJ will continue to monitor changes in this area and respond appropriately.

Objective	Commitments / Actions	Measures	Responsible	Progress to date (Apr 24)
Objective 1.3 Ensure effective development, learning and identification of best practice across the criminal justice system.	Ensure training is provided by PPS to counsel on updates and recommendation relating to MSHT – e.g. vulnerable witness training for solicitors working on cases involving vulnerable adult and child victims or defendants.	Training undertaken/ confirmed.	PPS	Consideration is being given to providing updated training for Panel Counsel, as following a recruitment exercise there are a number of new Panel Counsel with limited experience in the area. Any training is likely to take place in 2025. Vulnerable witness training will be provided as part of induction for newly appointed Panel Counsel.
	Ensure appropriate arrangements are in place to provide opportunities for continuous professional development and learning following the outcome of case reviews relating to MSHT.	Training and case reviews following case law changes or developments in legislation.	PPS, PSNI and DoJ	PSNI continue to provide training and awareness sessions to key frontline workers and criminal justice partners, including to PSNI recruits and investigators. Training is informed by investigations and aims to enhance knowledge of exploitation across NI.
	Ensure relevant guidance is updated and disseminated following MSHT case reviews and Organised Crime Taskforce (OCTF) MSHT Sub-Group is updated on relevant emerging best practice and developments.	Review of guidance on an annual basis.	All	Work is ongoing through regular OCTF MSHT Sub-Group engagement.
	Ensure slavery and trafficking legislation and support is utilised where appropriate in improving the system wide response to Child Criminal Exploitation (CCE).	Implementation of relevant CCE actions managed through the Child Protection Senior	DoJ, DoH and partners	In 2023 Child Protection Senior Officials Group (CPSOG) agreed a two-year action plan to address child exploitation in NI. The CPSOG work plan includes Child Criminal

		Officials Group (CPSOG).		<p>Exploitation (CCE) and Child Sexual Exploitation (CSE).</p> <p>A CCE Task & Finish Group reported to CPSOG in February 2023 setting out a range of recommendations to improve the response to child exploitation in NI. A CCE Implementation Steering Group (ISG) has been set up to implement agreed actions.</p> <p>Work has begun with PSNI to understand the differential in referrals for UK children in NI compared to rest of UK. The CCE action plan also includes an action to maximise existing MSHT legislation to prosecute those who exploit children.</p>
	Work closely with the office of the Independent Anti-Slavery Commissioner to respond as appropriate to emerging key issues and trends.	Ongoing engagement with the office of the IASC, ensuring timely input to annual reports. Respond to findings and recommendations in IASC reports.	DoJ and partners	DoJ have engaged at Official level with the Independent Anti-Slavery Commissioner following the appointment of the new IASC in December 2023.

Strand 2 – PROTECT: Reduce the harm caused by MSHT through improved adult and child victim identification and support.

Success in **PROTECT** will mean:

- more adult/child victims/ survivors of MSHT are identified; and
- adult and child victims of MSHT are provided with appropriate and effective support and protection to help them recover.

We will measure:

- number of victim referrals to NRM;
- number of victims supported through the DoJ contract;
- number of victims supported on a discretionary basis in line with legislation;
- number of victims receiving support following a positive Conclusive Grounds (CG) decision;
- number of children in need, looked after and care experienced young people who are supported by HSC Trusts;
- number of children supported through the independent guardian scheme;
- number of modern slavery claims to the Criminal Injuries Compensation Scheme;
- number of victims registered/encouraged to register on a victim information scheme, following prosecution of an offender; and
- training delivered to front line professionals.

PROTECT

Objective	Commitments / Actions	Measures	Responsible	Progress to date (Apr 24)
Objective 2.1 Proactive identification and reporting of all victims of MSHT by frontline organisations across all sectors.	Work in partnership with relevant organisations to ensure high-risk sectors ¹⁴ and frontline professionals are equipped with the appropriate skills and knowledge to help identify potential adult and child victims and ensure they are aware of the mechanisms to report cases of MSHT.	Training & awareness sessions delivered across key sectors and professional disciplines including: <ul style="list-style-type: none"> - Health & Social Care - Police - Prisons - Transport - Education /Youth Work - District Councils - DAERA - DfC - TEO 	DoJ	Training took place throughout 22/23 across a range of key sectors including PCSPs, NIPS, Compensation Agency and DfC Benefits staff. Work continues to ascertain the best way to ensure high risk sectors have the appropriate skills and knowledge. Hope for Justice have produced a free on-line training course and a QR link was used in DoJ campaigns for Anti-Slavery Day in October 2023.
	Work closely with First Responders (FR) and the Home Office to ensure high quality referrals are made to the NRM to ensure adult and child victims are getting the appropriate level of support in line with statutory requirements.	Quality and quantity of NRM referrals from Northern Ireland.	All FR Orgs.	Work is ongoing with delivery of in person training sessions and online mandatory training. PSNI MSHTU have devised a screening questionnaire for First Responders to use when speaking with a potential victim, providing a consistent approach. PSNI FR

Objective	Commitments / Actions	Measures	Responsible	Progress to date (Apr 24)
				training includes video resources from the National County Lines Co-ordination Centre. Key jurisprudence (including the ECtHR VCL & AN ruling) is being incorporated into all training delivered by MSHTU.
	Explore the options for expanding the list of FR organisations in Northern Ireland.	Number and range (across sectors) of FR organisations operating in Northern Ireland.	DoJ	<p>First Responder annual training took place in June 2023. In March 2023 the Education Authority were approached re becoming First Responders. This area will be explored further alongside Home Office colleagues.</p> <p>From July 2023 Youth Work Alliance were approved to be First Responders, enabling them to make referrals to the NRM.</p>

Objective	Commitments / Actions	Measures	Responsible	Progress to date (Apr 24)
<p>Objective 2.2 Provision of appropriate and effective support for all victims / potential victims of MSHT.</p>	<p>Ensure statutory support mechanisms are in place for all adult and child victims / potential victims of trafficking following referral to the NRM.</p>	<p>Assessment of the support provided to ensure it remains in line with statutory and other requirements.</p>	<p>DoJ</p>	<p>Contracts for the Provision of Support Services for Victims/Potential Victims of MSHT were awarded through two Lots. Lot 1 (Belfast & Lisburn Women’s Aid – adult female victims and their children) was awarded on 19 September 2023 and Lot 2 (Migrant Help – adult male victims and families) was awarded on 2 October 2023. Both contracts run for the duration 1 November 2023 to 31 October 2026 with the provision of two extensions, each up to two years. Victims/potential victims are supported by our partners until a Reasonable Grounds’ decision has been reached by the SCA. Six monthly Contract meetings took place throughout 22/23. These will continue in 2024 with the addition of monthly Operational Contract meetings, enabling discussion of key issues as and when they arise.</p>
	<p>Review provision of support services through regular engagement with service delivery providers, and other frontline stakeholders to address complex needs.</p>	<p>Commission a new support contract reflective of the needs of victims with complex needs.</p>	<p>DoJ</p>	<p>The procurement process to support victims with complex needs, such as addiction, did not attract any bidders. In September 2023 CPD colleagues sought feedback from tenderers and received 2 responses. Work is ongoing to</p>

		Anonymised satisfaction survey to capture views of survivors in relation to existing support provision.		agree options to resolve this, including a more focussed targeted pre-market engagement exercise and a revised questionnaire. This will enable DoJ to test the feasibility relating to these specific requirements.
	Publish guidance on needs-based support options / process for adult and child victims with a positive CG decision who require ongoing support.	Guidance published.	DoJ	Work will commence in 2024 on Guidance required in Northern Ireland including benchmarking across the rest of UK.
	Engage with compensation agency and identify and address barriers to accessing compensation for eligible victims.	Number of successful compensation claims/referrals for compensation support.	DOJ Compensation Agency	Work in this area is to be progressed. DoJ will engage with Compensation Agency colleagues to best understand an appropriate way forward.
	Build and maintain legal expertise and capacity to support victims of MSHT.	Development of a sustainable model for training and continuous professional development.	DoJ, DoH, relevant legal reps/partners	The PPS MSHT Policy has been published and is reviewed and updated where necessary on a periodic basis. Consideration is currently being given to providing refresher training on MSHT to legal staff to capture recently appointed lawyers who will not previously have had the benefit of training. DoJ continues to progress work to ensure sufficient expertise and capacity, including as part of the ongoing work on the Review of Legal Aid.

Objective	Commitments / Actions	Measures	Responsible	Progress to date (Apr 24)
<p>Objective 2.3 Provision of specialist support to child victims of MSHT in recognition of their unique vulnerability.</p>	<p>Work in partnership with DoH Strategic Planning and Performance Group (SPPG) and Health and Social Care (HSC) Trusts to ensure sufficient and appropriate accommodation options are available to meet the needs of separated/ unaccompanied child victims of MSHT.</p>	<p>Support provided to number of separated/ unaccompanied child victims in need, looked after and care experienced young people supported by HSC Trusts.</p>	<p>SPPG/HSC Trusts</p>	<p>A regional needs analysis on placement/accommodation needs of all separated and unaccompanied asylum-seeking children (S/UASC) was completed in August 2023, with a year 1 implementation plan to address priorities being progressed. Requirement for additional reception/assessment-based facility, foster care placements, supported lodgings placements, and accommodation with in-reach support has been identified across all Trusts.</p>
	<p>Ensure appropriate guidance and protocols are in place and are rolled out to all frontline staff likely to encounter child victims of MSHT.</p>	<p>Number of training & awareness sessions delivered across key sectors and professional disciplines.</p>	<p>SPPG</p>	<p>A training needs analysis has been completed with identified priorities for delivery in 24/25. First Responder training is being sought in discussion with DoJ to ensure awareness across Trusts and wider sector of requirements as it applies to both citizen children and S/UASC. A Regional Multi Agency Risk Assessment Guidance document is complete, pending PSNI insert, however the principles and practice as articulated in the Guidance is being applied by Trusts.</p>

	Continue to coordinate the regional practitioner's forum to support frontline staff within social services with skills, knowledge and networking/learning opportunities in meeting needs of separated and unaccompanied children.	Regularity & productivity of forum meetings including review of annual workplan/objectives.	SPPG	A regional practitioners forum meets quarterly, facilitated by interim UASC operational lead. An additional regional learning forum is in place for recently appointed staff in Trusts with responsibility for S/UASC.
	Build and maintain legal expertise and capacity to support child victims of MSHT.	Development of a sustainable model for training and continuous professional development.	DoJ, DoH, relevant legal reps/partners.	<p>The PPS MSHT Policy has been published and is reviewed and updated where necessary on a periodic basis. Consideration is currently being given to providing refresher training on MSHT to legal staff to capture recently appointed lawyers who will not previously have had the benefit of training.</p> <p>A specialist solicitor is now in place on a permanent basis to advise and guide HSC Trust staff on welfare and immigration related matters impacting on S/UASC.</p> <p>DoJ continues to progress work to ensure sufficient expertise and capacity, including as part of the ongoing work on the Review of Legal Aid.</p>

Strand 3 – PREVENT: Reducing the threat of MSHT by reducing vulnerability and by raising awareness.

Success in **PREVENT** will mean:

- fewer offenders will engage in MSHT;
- fewer adult and child victims will become entrapped by MSHT;
- increase public awareness of MSHT;
- specific and age appropriate resources are developed and delivered to ensure children understand the risks and harms of MSHT;
- increased awareness of the potential risk of MSHT for those seeking asylum; and
- reduced demand through increased awareness.

We will measure:

- media reporting of operational successes;
- number of awareness sessions delivered to each target audience;
- support available to children;
- adult and child victim referrals and support figures;
- calls to the Modern Slavery Helpline; and
- number of MSHT crimes recorded, prosecuted and convictions.

PREVENT

Objective	Commitments / Actions	Measures	Responsible	Progress to date (Apr 24)
Objective 3.1 Risks and emerging issues of MSHT are identified at an early stage to ensure appropriate responses can be put in place by relevant authorities.	Engagement with key stakeholders across a range of statutory and non-statutory sectors to monitor and assess the trends, risks, emerging issues of MSHT and identify at risk groups.	Ongoing assessment, engagement / initiatives with different sectors. Publish Annual Report for MSHT. Section on MSHT threat assessment and successful disruption included in OCTF Annual Report.	DoJ	DoJ MSHT officials and PSNI MSHTU officers contributed to the OCTF annual report, supported by OCTF MSHT Strategic Assessment. DoJ continue to engage with key partners across the OCTF MSHT Sub-Group and NGO Engagement Forum.
	Disseminate analysis of MSHT issues, data and best practice interventions across key stakeholders including OCTF-MSHT Sub-Group & NGO Engagement Group.	Victim referrals and support figures.	DoJ	DoJ facilitated 3 NGO Engagement Forum meetings and 2 OCTF MSHT Sub-Group meetings in 2023 to share key information and issues with stakeholders.
	Commission research into the experiences of adult and child victims and survivors and to develop the knowledge base on existing and emerging evidence to ensure a thorough understanding of what works in modern slavery interventions.	Research reports.	DoJ/ Relevant academic institutions	DoJ are engaging with research partners and considering next steps for commissioning research.

Objective	Commitments / Actions	Measures	Responsible	Progress to date (Apr 24)
	Improving management of information on MSHT using existing and emerging datasets to enhance our collective response to MSHT offences.	New datasets developed / available.	DoJ PSNI NGOs	PSNI Continually review emerging datasets and engage with key stakeholders to discuss data and best practice interventions.

Objective	Commitments / Actions	Measures	Responsible	Progress to date (Apr 24)
Objective 3.2 Key Government and private Sector institutions/com panies are using their leverage to proactively tackle MSHT	Provide guidance, support, and training to ensure a better understanding of the need for transparency in supply chains.	Awareness sessions held on TISC.	DoJ	DoJ included information around TISC when delivering wider awareness training to partners throughout 2023. DoJ continue to monitor UK Government policy developments around TISC to appropriately support NI partners.
	Ensure changes to strengthen Transparency in Supply Chains (TISC) are disseminated to Government Departments, Agencies, public and private bodies that fall within the scope of proposed legislation. Support organisations in the development of the Slavery Statements, which will include grievance mechanisms.	Slavery statements published in Northern Ireland by public sector organisations.	DoJ	In February 2021 DoJ launched a public consultation on additional measures proposed by the Home Office to strengthen TISC. There have been no further developments by Home Office, however DoJ will continue to monitor policy developments to appropriately support NI partners. DoJ will engage with and provide support to public sector bodies following and policy developments.
	Engage with Financial sector and promote good practice in tackling MSHT through financial services.	Number of sessions held with financial institutions.	DoJ	DoJ are considering next steps for further engagement with the Financial Sector. DoJ engaged with Invest NI colleagues on the Modern slavery and human rights in business guidance review (https://www.nibusinessinfo.co.uk/content/modern-slavery-and-human-rights-business).

Objective	Commitments / Actions	Measures	Responsible	Progress to date (Apr 24)
<p>Objective 3.3 Increased public awareness of MSHT in Northern Ireland.</p>	<p>Promote the Modern Slavery Help-line, Anti-Slavery Week and relevant initiatives to help increase public awareness and shine a spotlight on the hidden crime of modern slavery.</p>	<p>Proactive media and communications Strategy to raise awareness of this hidden crime.</p>	<p>All</p>	<p>PSNI undertook awareness raising campaigns through the use of social media, media engagement and collaborative “Day of action”, coinciding with Anti-Slavery Week in October 2023.</p> <p>DoJ shared social media release for Anti-Slavery Week (https://www.justice-ni.gov.uk/news/be-vigilant-signs-slavery). A QR code linking free online awareness training, developed by Hope for Justice, was also shared on DoJ Intranet. In May 2023 DoJ MSHT staff attended the Balmoral Show alongside colleagues in Organised Crime Branch.</p>
	<p>Engage with relevant NGOs to ensure that the specific needs of children are adequately reflected in the awareness raising initiatives.</p> <p>Raise awareness to ensure all sections of society are aware of the signs and how to report concerns, which will also contribute to the prevent objectives.</p> <p>Increase public awareness of the prevalence, nature and indicators of</p>	<p>Undertake a public survey of levels of awareness of the impact of MSHT and how to spot the signs and report concerns.</p>	<p>DoJ</p>	<p>Work is ongoing within DoJ with consideration being given to a wide range of methods to increase public awareness of MSHT.</p>

	MSHT in Northern Ireland – using billboard campaigns, social media, high profile events etc.			
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HOW PROGRESS WITH MSHT OBJECTIVES WILL BE REPORTED

- 2.1 A progress report on each of the objectives, commitments and actions in the Strategy will be published on a yearly cycle (with the first by the end of 2024) and will provide an update on progress with the Strategy and with express delivery dates which will be measured against Red/Amber/Green status.
- 2.2 It will set out what has been achieved and which commitments are on track to be delivered in each year of the three-year Strategy. The Organised Crime Task Force MSHT Sub-group will oversee reporting of the progress of actions in this Strategy.

CONTACT

- 2.3 If you suspect someone is a victim of modern slavery and human trafficking:
 - ring 999 in case of an emergency
 - 101 to report a general situation
 - 0800 0121 700 for the Modern Slavery Helpline

Further information about modern slavery and human trafficking can be found on the NIDirect website. (<https://www.nidirect.gov.uk/articles/modern-slavery-and-human-trafficking>)



**Public Consultation on Modern Slavery and Human
Trafficking Strategy**

October 2022 – January 2023

SUMMARY OF RESPONSES

April 2024

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About this response

This document summarises the outcome of the public consultation on a three-year Modern Slavery and Human Trafficking strategy for Northern Ireland.

It will cover:

- The background to the consultation
- A summary of the responses to the consultation
- Next steps

Scope of this consultation

The consultation was open to the public and welcomed responses from all stakeholders.

Further copies

You can request an alternative format version of this publication by email and by post.

By email: MSHTEnquiries@justice-ni.gov.uk

By post: Modern Slavery, Human Trafficking and Child Exploitation Branch,
Department of Justice, Castle Buildings, Stormont Estate, Belfast, BT4 3SG

SECTION 1

Introduction and Background

- 1.1. This document provides a summary of responses to the public consultation on a new three-year Modern Slavery and Human Trafficking Strategy for Northern Ireland.
- 1.2. Taking account of responses, the Department has produced a three-year Strategy for 2024 – 2027.

Background

- 1.3. Section 12 (as amended) of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 (the “2015 Act”) places a statutory requirement on the Department to publish, at least once every three years, a Strategy on offences under section 1 and 2 of the 2015 Act. Section 1 and 2 offences include slavery, servitude, forced or compulsory labour and human trafficking.

SECTION 2

The Consultation Process

- 2.1 The public consultation paper '[*Modern Slavery and Human Trafficking Strategy*](#)' was launched by the Justice Minister on 18th October 2022 and closed 12 weeks later on 10th January 2023.

SECTION 3

Number of Responses

- 3.1 In total, thirty-two responses were received. Eighteen responses were received via Citizen Space, while fourteen written responses were received via email. One respondent submitted both a response via Citizen Space and a duplicate of their response via email.
- 3.2 Discounting the duplicate submission, therefore, there were thirty-one responses in total. Twenty-one of these responses provided answers on Citizen space while ten respondents submitted written responses on the overall draft Strategy.
- 3.3 The Department welcomes all the responses to the consultation, reflective of the considerable interest and importance placed on tackling modern slavery and human trafficking. Comments provided by those who responded to the public consultation helped to inform the content, actions and overall direction of the Strategy.

SECTION 4

Summary of responses to the consultation

- 4.1 Overall, respondents welcomed the Department's public consultation on the draft MSHT Strategy and the commitment to publish a three-year Strategy. Of the comments received in relation to the overall Strategy, some supported all the Pursue, Protect and Prevent strands of the Strategy or objectives linked to the three strands. Other respondents chose to indicate support for particular actions/ commitments or objectives within the three P's of the Strategy, without commenting on others.
- 4.2 In relation to each objective, a number of respondents indicated their support for all commitments/ actions within the specific objectives under each strand, whilst some respondents indicated support for particular commitments/ actions but without commenting specifically on others.

PURSUE – To enhance the operational response and disrupt offenders ensuring they are brought to justice.

- 4.3 The commitments/actions that received the most support under the 'Pursue' strand of the draft Strategy were related to ensuring effective implementation of existing and new regulatory tools to disrupt and pursue offenders, improving and enhancing multi-sector collaboration in assessing and responding to emerging threats of modern slavery and human trafficking, through enhanced partnership working.

Objective 1.1

To ensure that modern slavery legislation is used effectively and remains relevant and fit for purpose.

Question 1.

Consultees were asked: **Having reviewed the commitments/actions of Objective 1.1 have you any comments to make regarding the commitments/actions tabled in the draft strategy. - Please give reasons for your response.**

- 4.4 All respondents were in favour of the introduction of Slavery and Trafficking Risk Orders (STRO) or similar orders but advised that training will be necessary to ensure orders are effectively used.
- 4.5 One respondent advised that training is essential for those people involved in enforcement to ensure legislation is effectively used.

- 4.6 One respondent suggested reviewing the number of Duty to Notify (DTN) submissions in England, Wales and Scotland to evaluate its necessity in the fight against MSHT. One respondent suggested if the DTN provision was commenced in Northern Ireland it should be reviewed to measure its effectiveness for law enforcement and support services.
- 4.7 To ensure modern slavery legislation is used effectively, remains relevant and fit for purpose, one respondent suggested listening to the voices of survivors of MSHT and their lived experiences.
- 4.8 Respondents voiced their support to the commitment/ action to consider options for expunging convictions for MSHT victims who have been unfairly prosecuted following forced exploitation/prostitution. A further respondent advised that this should be expanded to look at all forms of MSHT where a victim has been wrongfully charged with an offence.
- 4.9 One respondent suggested expanding the list of first responders would be beneficial as this would ensure that legislation is effectively used.
- 4.10 In relation to Section 22 Defence, respondents suggested that more training should be provided on its use and that the number of positive or negative cases where it has been referenced should be recorded as this information will prove useful for agencies and legal representatives of clients.
- 4.11 One respondent advised that it is particularly important to work in collaboration with stakeholders on employment rights.
- 4.12 One respondent suggested measuring the overall number of convictions linked to MSHT provides greater clarity on progress made around this issue in Northern Ireland.
- 4.13 Two respondents to the consultation advised that they supported the proposal to scope the need for legislation to require jury directions to be given in MSHT cases, however one respondent advised that a scoping exercise would be labour intensive and they also pointed out they were not aware of any legislation that sets out what a judge should state in their directions to a jury.
- 4.14 One respondent advised that the draft strategy did not make specific reference to the consideration of additional search powers for enforcement operatives to search a person during search of a premises under warrant for offences linked to modern slavery and human trafficking.

Objective 1.2

Ensure effective operational response.

Question 2.

Consultees were asked: **Having reviewed the commitments/actions of Objective 1.2 have you any comments to make regarding the commitments/actions tabled in the draft strategy. - Please give reasons for your response.**

- 4.15 To ensure an effective operational response, respondents to the public consultation made reference to the provision of training. Training in trauma informed approaches, training for agencies working in Public Protection Arrangements in NI and training for enforcement operatives specifically around the exploitation of local women.
- 4.16 Respondents welcomed the commitment to improve and enhance multi-sector collaboration. One respondent made reference to the land border that Northern Ireland shares with Ireland and suggested more work should be done through joint inspection teams to ensure intelligence and evidence is shared, ensuring ineffective parallel investigations are stopped and to comply with the Palermo Protocol principles. A number of respondents also made reference to better collaborative work between Departments referencing how DoH is tasked with the Exiting Prostitution Strategy suggesting it is not appropriately joined up with DoJ.
- 4.17 One respondent to the consultation advised that consideration should be given to the wider picture of MSHT in the strategy, especially its links to poverty and the disadvantaged. The respondent also suggested that action on trafficking must be viewed separately from general action on immigration to ensure that victims with insecure immigration status are not treated differently and feel confident to seek help on MSHT issues.
- 4.18 Respondents welcomed the trauma informed approach in obtaining evidential material advising that this would help improve engagement/relationships with victims which will in turn help increase the number of convictions. One respondent suggested a 'one stop' to gathering evidence from victims to reduce the number of times a victim needs to recount their experience.
- 4.19 One respondent suggested that any National Referral Mechanism data should be supplemented with qualitative/ anecdotal information to provide a broader understanding and awareness of the scale of MSHT in NI.
- 4.20 One respondent made reference to the findings of the University of Birmingham's SEREDA study which looked at the nature of sexual and gender-

based violence (including MSHT) experienced by forced migrants and the mechanisms needed to improve protection and support from sexual and gender-based violence (SGBV) related trauma. The respondent advised that research found women with insecure immigration status were more susceptible to sexual exploitation and the respondent feels that the new strategy should be inclusive of gender sensitivities to ensure there is access and support available to all exploited women.

- 4.21 One respondent agreed with the commitment/action to the early engagement between PPS and Law Enforcement in all cases that had a MSHT element.
- 4.22 One respondent to this question advised that more funding needs to be provided to reflect the increase in the number of referrals and aid support for victims of MSHT.

Objective 1.3

Ensure effective development, learning and identification of best practice across the criminal justice system.

Question 3.

Consultees were asked: Having reviewed the commitments/actions of Objective 1.3 have you any comments to make regarding the commitments/actions tabled in the draft strategy. - Please give reasons for your response.

- 4.23 One respondent recommended that DoJ work closely with the IASC to respond to emerging threats but also the need to work closely with other stakeholders across the UK and Ireland to enhance development, learning and identification of best practices. Another respondent suggested the nomination of an IASC for the whole of Ireland as they would improve effectiveness/hold powers to account and significantly help victims on their road to recovery from their lived experiences.
- 4.24 One respondent advised that in most cases around MSHT there is a delay and that more needs to be done to ensure victims and survivors are better informed of what is happening with regards to a case to ensure they remain confident in the judicial process while adequate support is provided to victims during any court case.
- 4.25 Respondents welcomed the planned action to deliver training by PPS to counsel within objective 1.3. Suggestions around the provision of a training map

so that best practice on training is shared and not duplicated was also suggested.

- 4.26 In answering this question one respondent made reference to compensation advising that this area needs an overhaul so that victims and survivors are better informed and supported on how to access compensation.
- 4.27 Respondents advised that capturing the experiences of vulnerable adults and children will help in developing training and guidance across the criminal justice system.
- 4.28 One respondent advised that guidance and training should also be sexual and gender based especially for those supporting women who have experienced trauma from all aspects of MSHT but in particular sexual exploitation. According to the respondent specialist training on gender sensitivities would make the disclosure of their experiences less traumatising and allow evidence to be gathered more effectively.

PROTECT – Ensuring that all adult and child victims of modern slavery and human trafficking are provided with an adequate level of protection and support.

- 4.29 The commitments/actions that received the most support under the ‘Protect’ strand of the draft Strategy were centred around child victims of MSHT and provision of specialist support to child victims, in recognition of their vulnerability, and expanding the list of First Responder organisations in Northern Ireland.

Objective 2.1

Proactive identification and reporting of all victims of MSHT by frontline organisations across all sectors.

Question 4.

Consultees were asked: Having reviewed the commitments/actions of Objective 2.1 have you any comments to make regarding the commitments/actions tabled in the draft strategy - Please provide reasons for your answer

- 4.30 Respondents made reference to training in their response to this question. One respondent advised that consistent and regular training should be at the core

of this objective as it was essential to spot the signs of MSHT to ensure vulnerable people are not exploited. As per the answer to question 3, one respondent suggested the provision of a training map so that best practice is shared and not duplicated. One respondent suggested an integrated training network across all key sectors/disciplines to promote shared language and understanding around MSHT. With regards to training one respondent advised that research to identify gaps in training would be helpful.

- 4.31 One respondent advised that it is important in developing training that we listen to the lived experiences and survivor stories in developing training and on how to raise awareness around MSHT.
- 4.32 Respondents were supportive of the commitment/action to explore the list of first responder organisations in Northern Ireland. One respondent suggested a co-ordinated approach in the way first responders are utilised, advising that this would make the process more efficient and would enable pooling of shared resources. A number of respondents advised that those who work with children should be added to the list of first responders while some respondents advised that all first responders need to be appropriately trained in providing quality NRM referrals and providing appropriate gender sensitive and trauma informed support.
- 4.33 One respondent suggested rewording a measure on page 27 from “number of children, and young people in aftercare, supported by Health and Social Care (HSC) Trusts and through the Strategic Planning and Performance Group (SPPG) residential facility,” to “Number of children in need , looked after and care experienced young people who are supported by HSC Trusts.” The respondent advised that the measure of residential facility is no longer a valid measure as there is no assurance that potential/actual victims will be placed in the regional facility and that the regional facilities are only for separated and unaccompanied asylum-seeking children (S/UASC) and would therefore not include local children.
- 4.34 One respondent advised that a measure under this objective should measure the availability and provision of trauma/therapeutic support services. Additionally, one respondent advised that more needs to be done around children, especially those who have been born as a result of their mothers being sexually exploited.

Objective 2.2

Provision of appropriate and effective support for all victims / potential victims of MSHT.

Question 5.

Consultees were asked: **Having reviewed the commitments/actions of Objective 2.2 have you any comments to make regarding the commitments/actions tabled in the draft strategy - Please provide reasons for your answer**

- 4.35 In relation to this question, one respondent advised that the experiences of survivors should be central throughout this strategy.
- 4.36 One respondent advised that a measurement of success in strand 2 could include the number of victims on a victim information scheme and encouraged victims to register with the Probation Board for Northern Ireland (PBNI), Northern Ireland Prison Service (NIPS) and DoJ Victim Information Services.
- 4.37 Respondents advised that support should be trauma informed and that the needs of all victims should be accounted for. In relation to support for children, a respondent suggested the duration of support needs should be kept under review.
- 4.38 One respondent advised that more support should be provided for those who do not want to enter into the NRM referral system and that more work needs to be done to reduce waiting times for decisions to be made.
- 4.39 On support provision, one respondent felt that more needs to be done to bring NI in line with the provision of long-term support provided to victims in England & Wales. One respondent advised that support should also consider reintegration and employment support. One respondent advised of the need for research around support provisions to identify services available and gaps in service provision. One respondent advised that support for victims of slavery and trafficking is essential to ensure we do not lose access to vital intelligence and evidence. One respondent also welcomed the commitment to develop guidance around support.
- 4.40 Respondents were in support of the commitment/action to explore options to overcoming barriers to accessing compensation for victims of MSHT and that more needs to be done to raise awareness around the entitlement to compensation.

- 4.41 One respondent welcomed the commitment/action to build and maintain legal expertise and capacity to support victims of MSHT, whilst one respondent suggested that there is a lack of solicitors with specialist knowledge and training in all aspects of MSHT and more training should be provided.
- 4.42 One respondent suggested a multi-agency client-based approach so that services are not duplicated for victims whilst two other respondents suggested regular engagement with frontline stakeholders and delivery providers to share knowledge and expertise, appropriately monitor support and identify limitations.
- 4.43 A number of respondents suggested the development of guidance on the different forms of MSHT, developed through a multi stakeholder approach, while one respondent urged caution in developing guidance advising that any document should be monitored and scrutinised.

Objective 2.3

Provision of specialist support to child victims of MSHT in recognition of their unique vulnerability.

Question 6.

Consultees were asked: **Having reviewed the commitments/actions of Objective 2.3 have you any comments to make regarding the commitments/actions tabled in the draft strategy - Please provide reasons for your answer**

- 4.44 Respondents agreed that there needs to be appropriate accommodation in place for children, while one respondent suggested that measures need to be in place to ensure that there is an adequate and appropriate level of accommodation available for children which includes a review of the quality and effectiveness of support within accommodation services.
- 4.45 One respondent sought clarification on the term 'unaccompanied children' and queried how and what support would be provided for teenagers. One respondent suggested the inclusion of HSC trusts in the commitment/action instead of SPPG as the lead agency as each trust has a named/ dedicated child sexual exploitation (CSE) lead while SPPG have a dedicated regional CSE lead. One respondent advised that more needs to be done to ensure that children who are victims of MSHT or who are born as a result of victims being sexually exploited should be financially supported. The respondent suggested a similar model to that of asylum seekers where financial aid is allocated per person in a household.

- 4.46 One respondent welcomed the commitment/action to build and maintain legal expertise and capacity for child victims of MSHT but wanted further information on how this will be achieved, advising that it must be child centred and trauma informed.
- 4.47 Respondents made reference to specialist support in responding to this question, advising more funding for specialist support where children may suffer trauma as a result of a parent being a victim of MSHT.
- 4.48 One respondent advised that, in relation to the commitment and action to continue to coordinate the regional practitioners' forum, an additional measure should include the review of its annual work plan/objectives.
- 4.49 One respondent agreed to the commitments/actions set out within objective 2.3, especially the development of a sustainable training model.
- 4.50 One respondent welcomed the commitment/actions to ensure guidance and protocols are in place and rolled out to all frontline staff likely to encounter child victims of MSHT and suggested a measure could be a list of agencies who have been provided with the guidance. One respondent advised that it is important that any guidance around child victims of MSHT is continually reviewed and updated.
- 4.51 One respondent welcomed the collaborative approach in the commitment/action of objective 2.3 as a positive development.

PREVENT – Ensuring that modern slavery and human trafficking is prevented through engagement, training and awareness raising across key services, public and private sector organisations and the wider public.

- 4.52 The commitments/ actions that received the most support under the 'Prevent' strand of the draft Strategy were related to commissioning research into the experiences of adult and child victims and survivors and developing the knowledge base on existing and emerging evidence to ensure a thorough understanding of what works in modern slavery interventions.

Objective 3.1

Risks and emerging issues of MSHT are identified at an early stage to ensure appropriate responses can be put in place by relevant authorities.

Question 7.

Consultees were asked: Having reviewed the commitments/actions of Objective 3.1 have you any comments to make regarding the commitments/actions tabled in the draft strategy - Please provide reasons for your answer

- 4.53 One respondent wanted further information on who was considered to be key stakeholders across statutory and non-statutory sectors to monitor and assess the trends, risks and emerging issues of MSHT.
- 4.54 Respondents welcomed the commitment/action to commission further research around MSHT. One respondent advised of the sensitivities of conducting research with child victims of MSHT but advised that research should be trauma informed taking into account the specific needs and experiences of children, including language barriers. One respondent advised that any research should consider gender aspects of MSHT, for example how women are more prone to sexual exploitation.
- 4.55 One respondent advised that more research should be undertaken around how paramilitaries control and exploit young people in Northern Ireland. One respondent advised that further research should be undertaken around the experiences of MSHT victims, including looking at what factors existed that gave rise to their initial risks and vulnerabilities. One respondent advised research should be commissioned to look at evidence-based interventions to break the cycle of MSHT and prevent reoffending.
- 4.56 One respondent advised that any research should be approached from an all-Ireland perspective, taking into consideration the experiences of adult and child victims to capture knowledge on existing and emerging practices/interventions.
- 4.57 One respondent advised that we should consider how information is shared in wider stakeholder networks around MSHT.
- 4.58 One respondent advised that victims hold the answers to a lot of questions around MSHT and it is important to consider better ways to engage, build trust, and provide assistance with survivors on their journey to integrate back into society.

- 4.59 One respondent advised that, due to the increase in the number of NRM referrals, it is important that training and awareness raising for organisations around MSHT is prioritised.

Objective 3.2

Key Government and private sector institutions/companies are using their leverage to proactively tackle MSHT.

Question 8.

Consultees were asked: Having reviewed the commitments/actions of Objective 3.2 have you any comments to make regarding the commitments/actions tabled in the draft strategy - Please provide reasons for your answer.

- 4.60 Respondents supported the commitments/actions around Transparency in Supply Chains (TISC). One respondent suggested more needs to be done around TISC, including more robust legislation, improved monitoring, enforcement and transparency, and that within the strategy reference should be made to client voice or engagement in the processes around TISC.
- 4.61 One respondent advised that DoJ should consider an additional commitment/action to provide additional guidance, support and training to ensure organisations have a better understanding of the need for transparency in supply chains. One respondent suggested companies in Northern Ireland who do not comply with the requirements of TISC should be highlighted. One respondent suggested that public bodies in NI should complete a slavery statement.
- 4.62 One respondent suggested training and awareness raising around TISC for those in procurement.
- 4.63 One respondent advised that public procurement should be explicitly referenced in the strategy as a unique lever to influence public and private sectors to tackle MSHT, reflecting the synergies introduced recently through Procurement Policy Notes (PPN) including PPN 01/21 Scoring Social Value, 03/21 Supply Chain Resilience and 05/21 Human Rights in Public Procurement
- 4.64 Respondents were in support of the commitment/actions to raise public awareness around MSHT and advised that a forum should be created to gather feedback on public awareness raising initiatives. One respondent advised that

the commitment to increase public awareness should be relocated to objective 3.3.

Objective 3.3

Increased public awareness of MSHT in Northern Ireland.

Question 9.

Consultees were asked: **Having reviewed the commitments/actions of Objective 3.3 have you any comments to make regarding the commitments/actions tabled in the draft strategy - Please provide reasons for your answer.**

- 4.65 Respondents welcomed the objective to increase public awareness of MSHT in Northern Ireland. One respondent welcomed the commitment/action to engage with relevant NGOs in developing awareness campaigns to ensure the specific needs of children are highlighted and suggested ensuring the views of children are considered in its development. One respondent advised that collaboration across agencies and sectors is vital to support delivery of an awareness campaign that highlights the risk to both adults and children around MSHT as some of those who are exploited are often not aware that they are victims.
- 4.66 One respondent advised that more work needs to be undertaken around anti-slavery week with planning taking place at an early stage. The respondent also suggested that the language used in any awareness campaigns should be reviewed to highlight exploitation of children and young people. One respondent advised that more needs to be done to ensure those vulnerable to MSHT are aware of their rights, entitlements and who to turn to for help.
- 4.67 One respondent reiterated the need to consider the voice of victims within the prevent strand of the strategy.
- 4.68 One respondent suggested consideration of further work with Coalition to Stop Slavery in the consultation process.
- 4.69 In answering this question, one respondent made reference to Immigration and Asylum, acknowledging it was a reserved matter in Northern Ireland but advised that more needs to be done to take steps to mitigate the risk of MSHT faced by those with insecure immigration status.

Further Comments

Question 10.

Consultees were asked: **Have you any further comments that you would like to make regarding the draft longer term strategy - Please provide further comments below.**

- 4.70 Two respondents to this question made reference to trauma, suggesting more needs to be done to allow victims time to heal due to the traumatic experience they may have faced, and that a trauma informed approach should be the principle to all objectives within the strategy.
- 4.71 Whilst immigration and asylum are reserved matters, a number of respondents referred to it. A number of respondents advised that people concerned regarding their immigration status may be reluctant to present themselves as victims of MSHT.
- 4.72 One respondent advised that there needs to be more reference to victim engagement and listening to victim's experiences within the strategy.
- 4.73 One respondent welcomed the legislative change to extend the provision of support for a period of up to 12 months or longer following a positive conclusive grounds decision. One respondent made reference to the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) which commits state parties to take action on trafficking and sexual exploitation and referenced its most recent examination in 2019, where it recommended that victims of trafficking have access to justice and remedies with adequate legal support and representation.
- 4.74 One respondent welcomed that the draft Strategy recognised the gender elements around MSHT, advising that women and girls are particularly vulnerable to sexual exploitation.
- 4.75 One respondent advised that, to strengthen the strategy, reference should be included around human rights obligations, with particular emphasis on investigating cases and pursuing prosecutions to ensure that all victims and stakeholders can have confidence in the Strategy.
- 4.76 Other respondents focused on the need for specialist training on MSHT, especially to ensure high quality referrals and better outcomes for potential victims of trafficking in Northern Ireland. One respondent advised that engaging with various stakeholders is a positive commitment but suggested

further work with our counterparts in the Republic of Ireland to ensure an 'All Ireland' approach to tackling MSHT.

- 4.77 A number of respondents suggested that legislation making it an offence to purchase sex should be repealed, whilst those with convictions around prostitution and brothel keeping should be expunged. One respondent advised that they are seeing more victims with complex needs and, whilst it is more challenging to provide support, more needs to be done to ensure adequate support is available to support those with complex needs, and that this should be considered in any tender process facilitated by DoJ.
- 4.78 Reference to BS25700 'Organizational Responses to Modern Slavery' was made in a written submission, advising on how it will be useful with regards to objective 3.1, 3.2 and 3.3 of the Strategy. The submission goes on to advise that this standard will be of benefit to businesses and organisations in Northern Ireland, especially as it is free to access. The guidance includes advice on preventative measures, identifying, analysing and evaluating exposure to MSHT risks, approaches to addressing identified risks, remedying modern slavery practices and reporting mechanisms.
- 4.79 It was recommended that reference to Article 2 of the Protocol 'to ensure that there is no diminution of the rights, safeguards and equality of opportunity provisions' should be incorporated in the Strategy. Furthermore, it was recommended that at all stages of the policy and legislation development consideration should be given to compliance with Ireland/ Northern Ireland Protocol Article 2 obligations, ensuring there is no reduction in rights of trafficked victims under the EU Anti-Trafficking Directions and of the rights of victims under the EU Child Sexual Exploitation Directive.
- 4.80 Other comments related to maintaining links to cross departmental commitments/actions to ensure victims of MSHT have effective access to education, housing and social security to build resilience and reduce the likelihood of re-trafficking.
- 4.81 It was recommended that DoJ consider the findings of the NI Affairs Committee inquiry into paramilitary activity and organised crime in NI, taking into consideration any relevant recommendations through the annual reports to ensure child trafficking concerns are subject to multi-agency discussion and co-ordination.
- 4.82 It was also suggested that Strand 3 (Prevent) of the Strategy should include explicit commitments/action for preventive measures that target those most at

risk of modern slavery and human trafficking. The submission advised that this includes ensuring that other NI Executive strategies and initiatives aimed at tackling the causes of poverty and inequality, including gender inequality, take account of modern slavery and human trafficking

SECTION 5

Next Steps

- 5.1 The Department has considered all responses to the consultation and the views expressed have helped to development the 2024 – 2017 Modern Slavery and Human Trafficking Strategy. The Strategy will be regularly reviewed with published progress reports, at least on an annual basis.