

CONSULTATION ON DRAFT NORTHERN IRELAND HUMAN TRAFFICKING AND EXPLOITATION STRATEGY 2015/16

COMPREHENSIVE RESPONSES

1. In your view, does the draft strategy meet the requirements under section 12 of the Act?		
Organisation/individual	Comments	DOJ response
Craigavon Trades Council	With proper commitment this strategy should go a long way to meeting requirements.	Noted.
Armagh City, Banbridge and Craigavon Borough Council	YES We support the overarching aims in terms of protecting the most vulnerable within society and putting a stop to criminal activities which seek to oppress and abuse men, women and children from both local communities and other countries.	Noted.
	Clearly there is a transnational thread which underlies this work and therefore the partnership aspect and developing stronger links on a global scale is viewed as an intrinsic part of this process.	Noted.
Women's Forum NI	YES	Noted.
CARE NI	YES The strategy is a comprehensive document which in our view fulfils the statutory obligation outlined in section 12 of the Human Trafficking and Exploitation Act. The Department is to be	Noted.

	commended on how thorough it has been in the development of its strategy in this area.	
Northern HSCT	YES	Noted.
Voice of Young People in Care	YES	Noted.
NISMP	The strategy meets the requirements outlined in the Act.	Noted.
Belfast Trust	YES The Draft Strategy 15/16 in the Belfast Trust view meets the requirements as set out under Section 12 of the Act. The Trust recognises that the Strategy builds on the work undertaken in the last 2 years and that there will be an annual strategy –action plan developed to sustain and progress this important area of work.	Noted.
Western Trust	YES The Western Trust considers the development of a strategy as cited in the Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 as a positive step forward in raising awareness both amongst	Noted.

	<p>professionals and the public and welcomes the collaborative approach to supporting the reduction of such offences.</p> <p>The strategy clearly indicates a commitment to strengthening and amending the legislative framework to enable relevant organizations and professionals to effectively investigate, protect and support potential victims.</p>	
	<p>There is evidence of communication channels between various organizations and departments in relation to monitoring, reporting, sharing information and ultimately tackling the issue.</p> <p>However, children’s services suggest it may be beneficial for there to be greater clarity on processes, roles and identification of individuals with designated roles for staff on the frontline in order to ensure clarity of process and lines of accountability. A supplementary flow chart for example may be an idea.</p>	<p>HSCB has responded:</p> <p>The regional document “Pathway for Safeguarding and Promoting the Welfare of Separated/ Unaccompanied Children arriving in Northern Ireland: Regional Operational Guidance” , Nov 2013 sets out the roles, responsibilities and reporting arrangements and requirements of all key agencies involved in working with Separated / Trafficked children and young people. If a lack of clarity exists within children’s services relating to roles and responsibilities the Regional Practice Network for Separated / Trafficked Children which</p>

	<p>There perhaps needs to be more connectivity and clarity in regards to the training of health and social care staff who are likely to have a key role in protecting and supporting both adult and children victims.</p>	<p>has membership from Trusts, PSNI, Border Force, UKVI, HSCB and DHSSPS is the forum through which such matters can be raised and addressed. HSCB chairs this group and notes this issue and will include as an agenda item at the forthcoming meeting of the Practice Network. It is intended with the introduction of the Independent Guardian Service for separated children to review the regional pathway guidance document therefore consideration can be given to addressing any issues relating to roles and responsibilities.</p> <p>Training needs is a standing item on the agenda of the Regional Practice Learning Network therefore issues of connectivity and clarity across health and social services where it relates to separated / trafficked children can be explored and addressed.</p>
<p>International Justice Mission (IJM)</p>	<p>YES</p> <p>IJM carries out casework around the developing world, working with local justice systems to encourage a strong law enforcement response to issues of violence such as human trafficking.</p>	<p>Noted.</p>

	<p>Therefore, we are extremely encouraged by the commitment of the Department of Justice in NI to raising awareness of the issue of human trafficking, in order to contribute to a reduction in the number of offences.</p> <p>We have made some points below regarding each strategic aim, however, overall, we feel the strategy does meet the requirements under section 12 of the 2015 Act.</p>	
Paula McVeigh	<p>YES</p> <p>In addition to the Actions already specified under 'Strategic Priority 3: Prevent, objective 2' for raising awareness, perhaps the use of social media and further media adverts could also be incorporated in order to fully raise awareness and comply with the requirements of section 12 of the Act</p>	<p>Noted.</p> <p>Partners on the Human Trafficking Engagement Group utilise social media to raise awareness of human trafficking.</p> <p>We need to bear in mind the financial constraints and affordability and have therefore prioritised actions. We hope to build on these in the future. However Northern Ireland did participate in the 2014 national Modern Slavery media campaign.</p>
HSCB	<p>YES</p> <p>The draft strategy meets the statutory requirements set out under Section 12 of the</p>	<p>Noted.</p>

	Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.	
NICEM	<p>Perhaps the most important bodies to coordinate the work of are those responsible for overseeing labour practices in NI, as the vast majority of potential victims of trafficking identified in NI in 2014 were trafficked for the purpose of forced labour. Indeed, statistics illustrate that this is a growing practice, with a 233% increase between 2013 and 2014 in the number of potential victims trafficked for this purpose in NI.</p> <p>Despite this, the system for overseeing employment practices in NI is significantly fractured. A number of bodies have responsibility for monitoring different practices and different workers, including the Gangmasters Licensing Authority, the Department of Employment and Learning's Employment Agency Inspectorate, the Health and Safety Executive NI, Her Majesty's Revenue and Customs (HMRC) and the</p>	The OCTF Subgroup provides a forum for appropriate coordination between relevant organisations. Membership will be reviewed in October 2015. The strategy remains focused on the more serious end of the spectrum of exploitation, though we recognise the need for appropriate engagement with a wide range of bodies overseeing labour practices.

	<p>Agricultural Wages Board.</p> <p>All of these bodies have the potential to encounter victims of trafficking for the purpose of forced labour, but there is significant disparity between these bodies as regards their preparation for this eventuality. The Gangmasters Licensing Authority regulates employment standards amongst those providing labour to the agriculture, horticulture, shellfish gathering and associated processing/packaging sectors. In the course of this work, the Authority frequently encounters victims of trafficking, which it then refers on to the National Referral Mechanism (NRM). Indeed, the Authority recently exceeded its target of increasing the number of potential victims of trafficking it refers to the NRM by 15%.</p> <p>The GLA currently trains its staff in terms of how to identify potential victims of trafficking, in line with guidance that it offers to other organisations. Indeed, the GLA currently works in partnership</p>	
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	<p>with the University of Darby to deliver a training course on identifying worker exploitation.</p> <p>Furthermore, the GLA ensures that it shares information with relevant Government Departments and, as noted above, it provides information to other organisations on how to identify potential victims of trafficking.</p> <p>However, while the GLA maintains a relatively high focus on trafficking – in terms of training and information-sharing – it must be noted that it is mandated to monitor only one area of employment. Indeed, of the referrals made to the NRM in 2013, only 1% was made by the GLA. Thus, a comprehensive approach that engages all employment monitoring bodies is needed in order to maximise the identification of potential victims.</p>	
	<p>The Employment Agency Inspectorate monitors the compliance of those employing agency workers with relevant legislation - this includes the Conduct of Employment Agencies and</p>	

	<p>Employment Businesses Regulations (Northern Ireland) 2005, which contain a number of restrictions on how agencies may treat their workers. Naturally, agency workers are vulnerable to experiencing forced labour, making trafficking an issue that Inspectors may encounter.</p> <p>Despite this, the Inspectorate does not offer its staff specific training on identifying potential victims of trafficking and, perhaps partially due to this omission, the Inspectorate has never signposted a victim to the NRM.</p>	<p>The Inspectorate is not a First Responder and therefore cannot refer a victim to the NRM. Inspectorate does however engage closely with PSNI to highlight concerns.</p>
	<p>The Health and Safety Executive NI is responsible for enforcing health and safety at work standards across NI. As Health and Safety Executive staff perform on-site inspections as part of their work, there is a clear potential for them to encounter victims of trafficking.</p> <p>Nevertheless, the Health and Safety Executive does not deliver any training to its staff on the need to remain vigilant for potential victims of</p>	<p>An action has been added under Strategic Priority 3: Prevent – for the DOJ to offer training to the Health and Safety Executive.</p>

	<p>trafficking or what to do if one encounters a potential victim.</p>	
	<p>HMRC and the Agricultural Wages Board both monitor the provision of minimum wage and receive complaints to that end. Again, there is potential for both bodies to encounter victims of trafficking whilst carrying out this work. This is especially so for the Agricultural Wages Board, as agricultural work is an area wherein forced labour practices typically proliferate.</p> <p>Nevertheless, staff from these bodies do not receive training on how to recognise a potential victim of trafficking and what procedures to follow if they encounter such an individual.</p> <p>Thus, whilst all of these bodies have a role to play in identifying victims, the level of training offered to their staff and the degree of information sharing undertaken amongst these bodies is inconsistent. While the GLA provides training to its staff and ensures information-sharing with some relevant bodies, it is</p>	<p>HMRC has recently been invited to join the OCTF Immigration and Human Trafficking Subgroup.</p> <p>We will engage with the Agricultural Wages Board to raise awareness.</p>

	<p>responsible for overseeing only one area of employment; a joint approach, from all employment monitoring bodies, is required to tackle the pervasive practice of trafficking for the purpose of forced labour.</p>	
	<p>In terms of information-sharing, it is reassuring that the current draft Human Trafficking Strategy provides for the creation of a Memorandum of Understanding to facilitate the exchange of operative learning between the PSNI, the GLA and the Employment Agency Inspectorate. However, it is felt that all employment monitoring bodies that could encounter potential victims of trafficking should be party to this memorandum, including the Health and Safety Executive NI, HMRC and the Agricultural Wages Board.</p> <p>As regards training, the GLA guidance for those who may come into contact with victims of trafficking, mentioned above, is notable. This guidance includes indicators for assessing whether somebody may be at risk. This would be</p>	<p>Engagement with other agencies will take place as necessary.</p>

	<p>a useful resource upon which to base training for the staff of other employment monitoring bodies.</p> <p>Ultimately, the Human Trafficking Strategy is an opportunity to ensure that cohesive standards, information-sharing and cooperative working are established amongst what is currently a disparate and segregated system for monitoring employment practices.</p> <p>NICEM recommends that the Human Trafficking Strategy provide for standardised training – based on the GLA guidance on this area - to be delivered to all employment monitoring bodies in Northern Ireland, focusing on:</p> <ul style="list-style-type: none"> • What constitutes forced labour; • Indicators that may suggest that an individual is a victim of trafficking; • Procedures to follow if you suspect that an individual has been trafficked. <p>NICEM also recommends that the Memorandum of Understanding provided for</p>	<p>Some progress has already been made on this, including work to raise awareness with Environmental Health Inspectors and other relevant personnel through Belfast City Council.</p> <p>An action has been added under Strategic Priority 3: Prevent – for the DOJ to offer training to the Health and Safety Executive. We will engage with the Agricultural Wages Board to raise awareness.</p>
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	<p>in the current draft Human Trafficking Strategy be extended to include agreement from the Health and Safety Executive NI, HMRC and the Agricultural Wages Board.</p>	
	<p><i>Provisions aimed at raising awareness of the rights and entitlements of victims.</i></p> <p>NICEM notes that there are a number of initiatives contained within the current draft Human Trafficking Strategy that aim to raise awareness of human trafficking generally. This includes a large number of proposed actions directed towards raising public awareness in order to enhance the identification of potential victims.</p> <p>While the draft Strategy envisions a significant number of awareness raising actions for this purpose, it is notable that few are specifically directed at raising awareness of the ‘rights and entitlements of victims’, as required by Section 12 of the Human Trafficking Act.</p> <p>Furthermore, there is no awareness-raising role</p>	<p>We have already made good progress against this with considerable programme of work already taken forward across the Criminal Justice And health sectors.</p> <p>Some work has already been taken forward to address this, including by DOJNI; GLA (Stronger Together Initiative); DEL Employment Agency Inspectorate and the Security Industry Authority.</p> <p>We believe that the strategy does address this issue – it includes actions around training for PSNI, PPS and the health sector as well as engaging</p>

	<p>envisioned for those employment monitoring bodies that may encounter potential victims at first instance.</p> <p>It is not disputed that furthering the identification of potential victims is an important aspect of awareness-raising, however legislation specifically provides that victims' rights and entitlements be promoted. Therefore, the finalised Strategy should expand its current provisions on raising awareness of victims' rights and entitlements – which are currently limited to the provision of multi-lingual leaflets, signposting through DoJ support services for victims of trafficking and briefing members of the legal profession.</p> <p>NICEM recommends that training on the rights and entitlements of victims be delivered to the staff of relevant employment monitoring bodies, so that this information may be passed on to potential victims and they may be appropriately signposted.</p>	<p>with the judiciary.</p> <p>We recognise the importance of this. We believe it is already covered in the strategy and will look to identify further opportunities in future.</p>
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	<p>Section 54 of the Modern Slavery Act 2015 extends to NI, requiring commercial organisations to provide a slavery and human trafficking statement. While the arrangements for overseeing this process are still in development, it is likely that a body will be responsible for monitoring organisations' compliance with this requirement.</p> <p>The results from the Home Office consultation on this mechanism will be forthcoming within the next month, so it is important for the Human Trafficking Strategy to consider how relevant actors, such as Government Departments and legal authorities, will interact with this new body to facilitate its oversight role.</p> <p>NICEM recommends that the finalised Strategy contain a commitment to include representation from any future body responsible for monitoring Human Trafficking Statements on the DoJ's Human Trafficking</p>	<p>DOJ is working with the Home Office on this issue. After consideration of the consultation responses, the Home Office has decided to set the turnover threshold at £36m per year. This means that all commercial organisations carrying on business in the UK with a total turnover of £36m or more will be required to complete a slavery and trafficking statement for each financial year of the organisation.</p> <p>How the statements will be monitored and regulated and has not yet been decided, although it is likely that this will be overseen by the Home Office.</p> <p>The strategy contains an action to commence provisions relating to Transparency in Supply Chains in the Modern Slavery Act 2015.</p> <p>We will ensure close liaison and communication as appropriate, but do not agree that this would enhance the role of the Engagement Group.</p>
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	<p>Engagement Group.</p>	
	<p>First Responders</p> <p><i>Arrangements for cooperation between relevant organisations and provision of training and equipment for investigators, prosecutors and those dealing with victims.</i></p> <p>Following a review of the NRM, the arrangements by which first responders refer individuals onto the NRM will be undergoing change, subject to a number of pilot schemes over the coming year. While it is unclear what the new role of first responders will be until these schemes conclude, the recommendations made by the review seek to create a more professionalised system of ‘Slavery Safeguarding Leads’ (or ‘Slavery Referral Leads’ in NI), membership of which would be limited to employees of public bodies. The Human Trafficking Strategy should be mindful of these future changes and ensure that there is clarity as regards what organisations will</p>	<p>Noted.</p>

	<p>be fulfilling this duty in NI and how they will cooperate with one another and organisations in the rest of the UK in order to share information and develop best practice under any new system.</p>	
	<p>Taking actions to ensure the sharing of good practice is particularly important, as the Home Office does not produce central guidance for all first responders in line with the guidance it produces for child first responders. No such guidance is likely to emerge until guidance is produced by the Department of Justice under Section 13 of the Human Trafficking Act, which itself will not be produced until the new NRM system is in place.</p> <p>Furthermore, if NGOs are to no longer participate in the NRM as first responders, then a link must be maintained between NGOs and Slavery Referral Leads, in order to facilitate information-sharing and the signposting of potential victims encountered by NGOs to Slavery Referral Leads.</p>	<p>We recognise the important role of NGOs. Effective links are already in place.</p>

	<p>Indeed, it will be important to ensure that key actors generally are aware of what their roles will be under the new system and what bodies they are to approach. Consequently, it would be beneficial for NGOs and other bodies that may encounter potential victims of trafficking to receive more information on the revised system when it comes to be implemented. In this regard, it is notable that Australia provides guidance to NGOs that work with trafficked persons.</p>	
	<p>NICEM recommends that the finalised Strategy commit to the establishment of a system of information-sharing amongst future Slavery Referral Leads.</p>	<p>We are awaiting the outcome of the NRM pilots in England and Wales.</p>
	<p>NICEM further recommends that the finalised Strategy commit to the maintenance of a relationship between NGOs and Slavery Referral Leads through the Human Trafficking Engagement Group.</p>	<p>We recognise the important role of NGOs. Effective links are already in place and our commitment to these is made clear through the “Partnership” priority.</p>
	<p>NICEM also recommends that the Department</p>	<p>We are committed to training and recognise the</p>

	<p>of Justice deliver training and/or guidance to NGOs, employment monitoring bodies and other non-Slavery Safeguarding Leads who may encounter potential victims of trafficking, focusing on:</p> <ul style="list-style-type: none"> • What constitutes human trafficking; • Indicators that may suggest that an individual is a victim of trafficking; • Procedures to follow under the revised NRM if you suspect that an individual has been trafficked. 	<p>importance. We have already delivered a wide range of training to NGOs and will continue to do so as appropriate.</p>
Belfast PCSP	<p>Yes the strategy does meet these requirements, however some additional areas should be considered / strengthened as indicated in the response.</p>	<p>Noted.</p>
Soroptimist International (SINI)	<p>YES</p> <p>SINI support the overarching aims in terms of protecting the most vulnerable within society and putting a stop to criminal activities which seek to oppress and abuse men, women and children</p>	<p>Noted.</p>

	from both local communities and other countries.	
Black and Minority Ethnic Women's Network (BMEWN)	<p><i>Cooperation between relevant organisations</i></p> <p>While the BMEWN acknowledges that the draft Strategy makes some measures on cross-border and EU cooperation, it is important to note that trafficking is a global phenomenon and international cooperation is required to fully combat this practice.</p> <p>Indeed, the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the UN Convention Against Transnational Organised Crime 2000 ('the Trafficking Protocol'), ratified by the United Kingdom (UK) in 2006, states – under Article 10.1 – that States Party will 'cooperate with one another' through information exchanges.</p> <p>Additionally, Section 2 of the European Plan on Best Practices, Standards and Procedures for Combating and Preventing Trafficking in Human Beings 2005 affirms that Member States should</p>	<p>We recognise that trafficking is a global phenomenon and will develop and maintain cooperation and links where possible. However we acknowledge the leading role that UK Government has in relation to international relations and co-operation.</p>

	<p>work with ‘third countries and...international organisations’ in their approach to trafficking. Thus, the Strategy must go beyond the cross-border and pan-European cooperation that is currently envisaged and develop measures for cooperating with States and organisations outside of Europe.</p> <p>One way in which this could be done is through the UN Global Initiative to Fight Human Trafficking (UNGIFT), of which the UK is a member. This organisation seeks to coordinate States’ activities to tackle human trafficking, with one of its core activities being ‘knowledge management’ – this involves disseminating information amongst stakeholders, identifying gaps in knowledge on trafficking and engaging stakeholders in contributing to the expansion of knowledge on human trafficking.</p> <p>The BMEWN recommends that the finalised Strategy include measures to facilitate cooperation with third countries and</p>	<p>We recognise that trafficking is a global phenomenon and will develop and maintain cooperation and links where possible. However we acknowledge the leading role that UK</p>
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	<p>international bodies, including through information exchange via UNGIFT.</p>	<p>Government has in relation to international relations and co-operation.</p>
	<p><i>Provision of training</i></p> <p>Article 10.2 of the Trafficking Protocol asserts that States Parties will provide training for ‘law enforcement, immigration and other relevant officials’ that will focus on ‘methods used in preventing...trafficking, prosecuting traffickers and protecting the rights of victims’.</p> <p>The requirement of training for ‘protecting the rights of victims’ has relevance for competent authorities (under the NRM) when interviewing potential trafficking victims. It is notable that while current guidance for competent authorities notes the existence of victims’ rights, there is no integration of this knowledge into the interviewing process.</p> <p>The current interviewing process is largely focused on extracting information from the potential victim and assessing the credibility of their testimony, without considering how</p>	<p>Training for law enforcement, immigration and other relevant officials has already been provided. Training has also been provided to NGOs. Training remains a priority for the Department as per actions set out in the Strategy. Following the review of the National Referral Mechanism (NRM), multi-agency panels are currently being piloted in England and Wales as an alternative to Competent Authorities. We await the outcome and lessons learned from those pilots. However the provision of training for Competent Authorities is a matter for the Home Office.</p>

	<p>questioning could be delivered strategically in order to assist the potential victim to deliver a true account and minimise the risk of re-traumatisation.</p> <p>Further on this issue, it is important for the delivery of training to be coordinated amongst multiple actors where possible, in order to maintain consistency in approach amongst different bodies.</p> <p>For example, it would be possible to deliver cross-organisational training to the PSNI, employment-monitoring bodies and relevant NGOs on indicators of human trafficking the procedures to follow if one suspects that they have encountered a victim of trafficking.</p> <p>It is notable that now is a particularly timely occasion to deliver such training, as organisations will need to be updated on the new NRM process that is emerging following a review of the mechanism and pilots in Great Britain.</p> <p>Finally, it is notable that the provision of training</p>	
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	<p>to relevant actors represents an opportunity for international cooperation. International organisations can be a useful source of support for training investigators in collaboration with other States, as evidenced by the work of the International Association of Human Trafficking Investigators (IAHTI); the US-based IAHTI has provided training for trafficking investigators across 10 different countries.</p> <p>Furthermore, the Strategies of other States may be looked to as examples of good practice in this regard. For example, the Albanian National Strategy on Combating Trafficking in Persons envisages working with 'international partners' to deliver training to the Albanian State Police and in delivering joint training to investigators and prosecutors.</p> <p>Training also needs to address the issue of cultural awareness. Network members have personal experience of GPs asking potential victims to contact their families, when their</p>	
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	<p>country of origin is such that this would be difficult or impossible.</p> <p>The BMEWN recommends that training be provided to competent authorities, so that they may conduct interviews in a manner that facilitates accurate disclosure from victims and minimises the risk of re-traumatisation. It is additionally recommended that cultural awareness training should be provided to relevant organisations, so that potential victims are not treated insensitively or asked to provide information or make contact with family members where this is unlikely to be possible.</p> <p>It is also recommended that the finalised Strategy provide for the delivery of cross-organisational training to the PSNI, employment monitoring bodies, employers and relevant NGOs on indicators of human trafficking and the procedures to follow if one encounters a potential victim.</p>	
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	<p>It is further recommended that the finalised Strategy draw on support from international organisations or other States in order to deliver training to police and prosecutors.</p>	
	<p><i>The rights and entitlements of victims</i></p> <p>It is notable that there are a number of special measures available for vulnerable victims who are giving evidence against perpetrators. These can include screening victims from the defendant, giving evidence via live link or clearing the public gallery.</p> <p>While the Public Prosecution Service for Northern Ireland's (PPSNI) current policy on prosecuting cases of human trafficking asserts that special measures will be utilised where appropriate, it does not contain a strict requirement that victims be informed of their potential entitlement to special measures and what these special measures are.</p> <p>This could result in victims being denied special measures where the prosecutor has failed to</p>	<p>Noted. PPS commented:</p> <p>PPS will continue to contribute to training PSNI officers on special measures as they are the first point of contact for victims who report human trafficking. Police will advise on the availability of special measures and ascertain from the victim if they require special measures at that stage. Police will conduct ABE video interview with victims in appropriate cases.</p> <p>When a file is submitted to the PPS the police should have indicated whether the victim requires special measures and provide any supporting evidence to enable PPS to make an application to court for special measures to be granted.</p> <p>Further, when a file has been received by PPS the Victim and Witness Care Unit will then become involved. The services provided by VWCU are</p>

	<p>apply for them, or refusing special measures where they are not fully informed on what they include.</p> <p>Further concerning victims' entitlements, it is important that potential victims are made aware of the fact that they may not be forcible returned to their country of origin if they are found to be a victim of trafficking. Fear of being removed from the UK is a major obstacle to victims reporting that they have been trafficked, so raising awareness of this entitlement is vital to ensuring that an effective system for combating trafficking is established.</p> <p>The BMEWN recommends that the Strategy include a commitment to adapt PPSNI policy on prosecuting cases of human trafficking, so that victims may informed of their potential entitlement to special measures. This will ensure that the judiciary utilises procedure to ensure potential victims' safety and privacy where possible.</p>	<p>outlined in section 10 of the PPS policy. Section 10 explains that the VWCU will conduct a 3-tier needs assessment for each victim and witness at key stages of the process. The purpose of the assessment is to ensure that the particular needs of the victim/witness are met as far as possible and to identify as early as possible whether a victim/witness may require the assistance of special measures to enable them to give their best evidence at court, or other measure such as a Witness Anonymity Order.</p> <p>Advice and guidance, including advice pertaining to immigration status, is provided to potential victims of human trafficking through the DOJ support contract.</p>
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	<p>It is also recommended that the Strategy commits to a campaign of awareness-raising, so that victims of trafficking are made aware that they will be entitled to leave to remain if they are recognised as a victim.</p>	
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2. In your view, is this strategic aim appropriate? What, if any, alternative strategic aim would you propose?		
Organisation/individual	Comments	DOJ response
Women's Forum NI	<p>NO</p> <p><i>Alternative suggestion:</i> 'To prevent and eradicate human trafficking, slavery and forced labour, to ensure that Northern Ireland is not an attractive location for human trafficking in whatever form.</p>	<p>We believe that the strategic aim needs to be concise and high-level, however the strategic aim has been revised to replace the term "drive out" with "eradicate" and to reflect victim protection.</p>
CARE NI	<p>YES</p> <p>This strategic aim is well balanced, giving appropriate weight to not only human trafficking but also slavery and forced labour. We also fully endorse the idea that the strategy should seek to equip the people of Northern Ireland to take action. This reflects the fact that the Department cannot tackle this problem on its own.</p>	<p>Noted.</p>

Northern HSCT	<p>YES</p> <p>The definition of trafficking and exploitation, needs to be applied uniformly across both foreign and the indigenous population, eg, EU citizens, travellers etc.</p>	Noted.
Armagh City, Banbridge and Craigavon Borough Council	<p>YES</p> <p>A suggestion would be to strengthen the strategic aim to recognise Northern Ireland as a best practice approach for putting a stop to human trafficking.</p>	We note the suggestion that the strategic aim should recognise Northern Ireland as an example of best practice, however, we believe that the aim needs to be concise and high-level.
	<p>Support strengthening the legislation, and having greater penalties for those involved in perpetrating trafficking.</p>	Noted – penalties were increased to under the 2015 Act. Modern slavery offences now attract a maximum life sentence.
	<p>Reinforce the need to prevent and deter traffickers from using Northern Ireland as a base to exploit people.</p>	Noted.
Voice of Young People in Care	<p>YES</p> <p>As an overall aspirational aim, we welcome this strategic aim and believe it is an appropriate aim to drive out human trafficking, slavery and forced labour.</p>	Noted.

British Red Cross	<p>The Red Cross welcomes explicit references to slavery and forced labour as well as human trafficking within the overall aim. Article 1 of the CoE Convention includes as an aim ‘to protect the human rights of victims of trafficking’, and Principle 1 of the UN Recommended Principles and Guidelines on Human Rights and Human Trafficking state that “the human rights of trafficked persons shall be at the centre of all efforts to prevent and combat trafficking and to protect, assist and provide redress to victims.” Moreover, in all matters concerning children, it is established international human rights law that their best interests shall be a primary consideration. The Red Cross therefore considers that the aim should also include protecting the human rights of adult and child victims, and ensuring the best interests of children and young people.</p>	<p>Agree that protecting human rights is central.</p> <p>Need to balance against need for high level and concise aim. The aim has been modified to reflect victim protection.</p>
Belfast Trust	<p>The Trust agrees with the proposed strategic aim but would suggest that there is a need to extend</p>	<p>Agreed. The strategic aim has been revised to include the term support and protection of victims.</p>

	<p>this overall strategic aim to include recognition of the victim. It is recommended that the term support and protection of victim is added to the overall strategic aim to provide balance in terms of priorities from the outset.</p>	
Western Trust	<p>YES</p> <p>The Western Trust welcomes and agrees with the proposed overall strategic <u>aim</u> “To equip Northern Ireland to drive out human trafficking, slavery and forced labour.”</p> <p>It is only in raising awareness, strengthening legislative frameworks, and processes can organizations be equipped with the knowledge and skill to protect and support victims, and ultimately disrupt and ensure prosecution of those responsible for human trafficking, slavery and forced labour.</p>	Noted.
IJM	<p>In IJM our aim is not simply to rescue and help those who have suffered exploitation, such as that of human trafficking. We also want to work to address whole public justice systems,</p>	Accepted. The term “drive out” has been replaced with “eradicate”.

	<p>strengthening them, in order that crimes such as that of trafficking decrease and, therefore, people are protected from violence in the first place.</p> <p>Therefore, we appreciate that the Department of Justice does not simply desire to ‘plug the hole’ so to speak, but desires to tackle root causes and to see a decrease in the crime within our borders (i.e Preventing as well as Pursuing, Protecting and supporting, in Partnership).</p> <p>However, the use of the term ‘drive out’ concerns us; it suggests that the crime might go elsewhere, perhaps into neighbouring or close countries. The crime, as we know, is global and crosses borders, and we must see that our job is not done simply if the crime decreases here, especially if that means it increases elsewhere.</p> <p>Our approach must be to work together with other jurisdictions to see an overall decrease.</p>	
Law Centre NI	The phrase “ <i>to drive out</i> ” suggests that traffickers and their victims can move to another jurisdiction. We believe that the NI strategy must	Accepted. The term “drive out” has been replaced with “eradicate”.

	<p>reflect the 2012 – 2016 EU Strategy towards the Eradication of Trafficking in Human Beings. The first aim of this strategy must also be to eradicate human trafficking wherever it is throughout Northern Ireland in cooperation with the rest of UK, the Republic of Ireland and EU Member States.</p> <p>Law Centre therefore recommends the strategic aim is <i>“To equip Northern Ireland to eradicate human trafficking, slavery and forced slavery”</i>.</p>	
Paula McVeigh	YES	Noted
HSCB	<p>YES</p> <p>The strategic aim is appropriate.</p>	Noted.
NICEM	<p>While it is important for the overall aim of the Human Trafficking Strategy to highlight the combative purpose of the Strategy under Section 12(3)(b) of the Human Trafficking Act, it is equally important for the victim-oriented aspects of the Strategy to be recognised within its strategic aim.</p> <p>Section 12(4)(a) and (b) of the Human Trafficking</p>	The strategic aim has been revised to include the term support and protection of victims.

	<p>Act requires that the Strategy set out arrangements for cooperation amongst and training for relevant organisations in terms of dealing with victims of trafficking.</p> <p>Additionally, Section 12(4)(c) states that the Strategy will include provisions aimed at raising awareness of the rights and entitlements of victims. Consequently, victim-oriented provisions are as relevant an aspect of the Strategy as those provisions aimed at tackling trafficking in a criminal justice sense.</p> <p>Some acknowledgement of the provision for victims made within the Strategy should be made in its strategic aim.</p> <p>NICEM recommends that the finalised Strategy’s overall strategic aim read: ‘to equip Northern Ireland to drive out human trafficking, slavery and forced labour and protect victims and potential victims of trafficking from harm’.</p>	
Belfast PCSP	The strategic aim of the strategy needs to	Agreed. The strategic aim has been revised to

	<p>declare support for victims and their integration or reintegration post care.</p> <p>Support for victims should be at the heart of the fight against human trafficking.</p>	include the term support and protection of victims.
SINI	<p>YES</p> <p>SINI has some concerns about the terminology of the Overall Strategic Aim. To “Equip NI to drive out human trafficking, slavery and forced labour” could imply that NI’s approach will be to simply shunt the problem elsewhere. This is obviously not the case but SINI feel that the words “drive out” are not appropriate and there needs to be some reference to support for victims particularly as the policy towards the treatment of victims is evolving in this direction.</p>	<p>Agreed. The strategic aim has been revised to include the term support and protection of victims. The term “drive out” has been replaced with “eradicate”.</p>
BMEWN	<p>While the current aim is broadly acceptable, it is felt that it does not pay sufficient heed to the rights of victims. It is noted that raising awareness of the rights and entitlements of victims is one of the statutory elements of the Strategy, under Section 12 of the Human</p>	<p>Agreed. The strategic aim has been revised to include the term support and protection of victims.</p>

	<p>Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. Furthermore, the strategic aim should make a clear distinction between traffickers and victims. It is notable that victims of trafficking have been prosecuted in the past for offences committed while being trafficked and the spirit of the Human Trafficking and Exploitation Act is to provide further support for victims, rather than to further their persecution.</p> <p>The BMEWN recommends that the overall aim of the Strategy read: “To equip Northern Ireland to drive out those responsible for human trafficking, slavery and forced labour, and protect the rights of the victims and potential victims of trafficking”.</p>	<p>Noted.</p>
<p>Revised strategic aim: “to equip Northern Ireland to eradicate human trafficking, slavery and forced labour and to protect and support victims”.</p>		

3. In your view are these the right strategic priorities? What, if any, alternatives would you propose?		
Organisation/individual	Comments	DOJ response
Craigavon Trades Council	The priorities are correct.	Noted.
Women's Forum NI	(See additions in bold) <u>Protect and support</u> (provision of effective protection and support and improved identification of victims, and the provision of interpreters who are officially registered, vetted and impartial.)	We note the suggested additions to Strategic Priority 1: "Protect and support", however, strategic priorities should be high-level and the inclusion of the suggested text around translators is too detailed.
	<u>Prevent</u> (prevent and reduce risk of human trafficking and exploitation in Northern Ireland); and re-trafficking e.g. rescued women can be approached and picked up again by their traffickers.	We accept that Strategic Priority 3: "Prevent" should make reference to preventing and reducing the risk of re-trafficking and have amended the strategy accordingly.
	<u>Partnership</u> (effective, collaborative and joined up partnership response to human trafficking and exploitation).	We also agree with the additional wording suggested in relation to Strategic Priority 4: "Partnership" and have amended the strategy accordingly.
CARE NI	YES CARE Northern Ireland believes that these four	Noted.

	strategic priorities are appropriate and comprehensively cover the areas that a strategy like this should consider.	
Northern HSCT	<p>YES</p> <p>The NI issue of an internal, unmanned border will need to be effectively dealt with if “prevent” is to be fully realised.</p>	<p>Noted.</p> <p>We are conscious of the need for a cross-border response and good co-operation exists between Departments and law enforcement in both jurisdictions, as reflected under the Partnership strategic priority.</p>
	<p>There is a need to highlight the risk of CSE as some young people who are victims of CSE have been found to be internally trafficked.</p>	<p>We acknowledge the overlap between human trafficking and Child Sexual Exploitation (CSE), however, we believe that CSE merits a specific focus. The Department’s “Tackling Child Sexual Exploitation in Northern Ireland” action plan was published in March 2015.</p>
Armagh City, Banbridge and Craigavon Borough Council	<p>YES</p> <p>We are in agreement with the four strategic priorities as providing a comprehensive approach to dealing with the issue.</p>	Noted.
Voice of Young People in Care	<p>YES</p> <p>VOYPIC welcomes the four strategic priorities</p>	Noted.

	<p>underpinning the overall strategic aim and believe that all 4 priorities have an equal part to play to drive out human trafficking, slavery and forced labour.</p>	
NISMP	<p>The four strategic priorities provide a relevant and rational framework which will help coordinate the work of organisations towards the overall aim of driving out human trafficking, slavery and forced labour.</p>	Noted.
	<p>It is important, however, that in implementing the strategy, there is a particular focus on reducing the risk and providing suitable support for groups who are acknowledged in the OCTF research as being more at risk of trafficking, forced labour and slavery offences. It is of note that in 2013 and 2014 the UK and Ireland were respectively the 3rd and 4th most common countries of origin of potential victims. The strategy must therefore address the issue of exploitation as separate from immigration as well as exploitation which is compounded by trafficking across borders.</p>	Agreed. We believe that the strategy seeks to do this.

	<p>Likewise, where appropriate, the activities should acknowledge the sectors where these offences have been more prevalent in Northern Ireland. We have indicated in our responses to the questions below, the activities where we think this should be a clear focus.</p>	<p>Agreed. We believe that the strategy seeks to do this.</p>
	<p>The key performance indicators which are chosen to measure progress against each of the stated objectives should similarly be able to gauge how successful actions have been in reducing the risks for these vulnerable groups and within these sectors.</p>	<p>Noted, however the challenge is to identify a reliable means of measuring this: many of our actions, if effective, could lead to an <u>increase</u> in identified victims (because of increased reporting), whilst at the same time reducing risk and vulnerability.</p>
<p>British Red Cross</p>	<p>Given the particular vulnerability of children to trafficking and exploitation, and the particularity of their needs, the Red Cross considers that children could be better prioritised within the Strategy.</p>	<p>The Strategy is for all victims / suspected victims of human trafficking; adult and children who are all considered vulnerable. By virtue of the fact that a child has been trafficked / suspected of having been trafficked it is considered to a child in need under the Children (NI) Order 1995 and as such will come under the care of the relevant HSC Trust. Children have also been identified as a vulnerable group in the Engagement Group's targeted</p>

		<p>awareness programme. In addition the DOJNI has a separate CSE action plan, “Tackling Child Sexual Exploitation in Northern Ireland”, which was published in March 2015.</p> <p>There is representation by HSCB and DHSSPS on the OCTF Group.</p> <p>In addition, the strategy has been amended to reflect that DOJ will seek representation on the Regional Practice Learning Network for Separated / Trafficked Children, which is hosted by HSCB with membership from HSC Trusts, DHSSPS, Border Force, PSNI, UKVI, NSPCC and VOYPIC in the strategy. Such involvement should strengthen cross agency information sharing and ensure that children’s issues are fully included within the actions contained within the Strategy.</p>
	<p>We note the specific recommendations relating to the identification of children by the Group of Experts on Trafficking in Human Beings (GRETA), including that Health and Social Care Trusts should act as the Competent Authority for</p>	<p>Following the review of the National Referral Mechanism (NRM), multi-agency panels are currently being piloted in England and Wales as an alternative to Competent Authorities. We await the outcome and lessons learned from those pilots.</p>

	<p>child victims in Northern Ireland to ensure their special needs and circumstances are taken into account.¹ The Red Cross therefore asks that (i) children are given greater emphasis within the Strategy’s priorities and (ii) the Department of Justice examines how GRETA recommendations on children can be included, particularly on the feasibility of Health and Social Care Trusts acting as Competent Authority.</p>	
	<p>While recognising that, once in the National Referral Mechanism, Migrant Help support male victims (which includes its MoU with Red Cross) and Women’s Aid female victims, the gendered nature of trafficking is not apparent from the Strategy. The EU Directive highlights “the gender-specific phenomenon of trafficking and that women and men are often trafficked for different purposes. For this reason, assistance and support measures should also be gender-</p>	<p>Particular groups (gender/age/nationality) are covered under the actions included in the strategy.</p> <p>Provision in respect of specific needs is also covered by section 18 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. We do not feel that an additional strategic priority is required, as appropriate provision is already covered and is inherent throughout the strategy.</p>

¹ As above, note 8, para 22.

	<p>specific where appropriate.” The Red Cross therefore asks the gendered nature of trafficking and exploitation is emphasised. By way of suggestion, this and ensuring children are accorded greater attention within the Strategy, could be achieved by a new Strategic Priority on ‘Particular Groups’ with objectives and actions to ensure support specific to age and gender, as well as other particular needs such as disability, state of health, and pregnancy, which are not presently mentioned in the Strategy.</p>	
	<p>As noted above the Strategy’s development, implementation and evaluation should be premised on participation of all stakeholders and the facilitation of participation by victims or potential victims, including children in accordance with Article 12 of the UN Convention on the Rights of the Child. The Red Cross therefore considers that the fourth aim on ‘Partnership’, which focuses on co-ordination</p>	<p>We ensure that victims are afforded a voice and victim advocates/supporters are represented on the Human Trafficking Engagement Group. However, we are mindful of the need to avoid secondary victimisation of victims and sensitive to the potential effect of direct engagement. In addition, many victims choose <u>not</u> to remain in the United Kingdom. For these reasons we have not accepted this recommendation.</p>

	and co-operation between relevant bodies and trafficked and exploited people, should be amended to ‘Partnership and Participation’ with associated actions to enhance the latter.	
Belfast Trust	<p>YES</p> <p>The Trust view the four Strategic priorities identified as appropriate and welcome the focus on support and protection of victims alongside the holding of the alleged perpetrator to account through the criminal justice process. Furthermore it is acknowledged that prevention and partnership are recognised as central strategic priorities.</p>	Noted.
Western Trust	<p>YES</p> <p>The Western Trust agrees with the identified strategic priorities contained within the draft strategy. These strategic priorities address the multi-organizational roles and responsibilities in detecting human trafficking and exploitation, protecting and supporting victims, ensuring</p>	Noted.

	<p>prosecution for offenders and ultimately preventing / deterring it from happening in the first place.</p> <p>The Western Domestic Violence Partnership agrees with the strategic objectives.</p>	
IJM	<p>IJM has been tackling human trafficking in various parts of the developing world since our inception in 1997, aiming to protect those in the poorest communities from exploitation. We do so by partnering with local authorities to rescue victims, bring criminals to justice, restore survivors and to strengthen justice systems in order that the prevalence of the crime decreases. We have seen great progress, such as in Cebu, the Philippines, where, over a four year period, the number of minors available for sex in brothels in the casework area reduced by 79% This is, in large part, due to our multi-faceted and partnership approach.</p> <p>We can see that the strategic priorities proposed above closely relate to those of IJM. We believe</p>	Noted.

	that incorporation of work in all the areas highlighted (Pursuing, Protecting and Supporting, Prevention and Partnership) is crucial in tackling the crime of human trafficking and are hopeful that there can be continued progress against trafficking within NI if this multi-faceted approach is maintained.	
Paula McVeigh	YES	Noted.
HSCB	YES The 4 themes of Pursue, Protect and Support, Prevent and Partnership appear to address the main areas for consideration when addressing human trafficking and exploitation.	Noted.
NICEM	The international discourse on combating trafficking is rooted in Article 2 of the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children 2000 ('Protocol on Trafficking'), which requires States Party to 'prevent' and 'combat' trafficking, 'protect' victims of trafficking and 'promote	The "Pursue" Strategic Priority is intended to be appropriately comprehensive and to cover investigations, prosecutions and punishment. We have not accepted this recommendation.

	<p>cooperation' in tackling trafficking. This Protocol was ratified by the United Kingdom in 2006.</p> <p>While the UN Protocol established a 'three Ps' approach - focused on prevention, protection and prosecution – discourse has since evolved to support a five Ps approach, which addresses 'Prevention', 'Prosecution', 'Protection', 'Partnership/Promotion' and 'Punishment'. Since 2009, the UN Special Rapporteur on Trafficking has supported the adoption of a five Ps approach by States Party in their efforts to combat trafficking. The United Arab Emirates, for example, adopts the 'internationally preferred' five Ps strategy for combating trafficking. The Netherlands also utilises this approach.</p> <p>While these elements are arguable covered under the four strategic priorities in the current draft Strategy, including prosecution (addressed under 'Pursue') and provision (addressed under 'Protect and support'), consideration should be given to restructuring the Strategy under the five</p>	
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	<p>headings that are utilised internationally.</p> <p>NICEM recommends that the Strategy's four strategic priorities be restructured to provide for five strategic priorities (Prevention, Prosecution, Protection, Partnership and Punishment), in compliance with current international practice.</p>	
<p>Law Centre NI</p>	<p>The four strategic priorities all make good sense, however, we would ask Department of Justice to consider the EU strategy which has five strategic priorities, the fifth being:</p> <p style="text-align: center;"><i>Increased knowledge of and effective response to emerging concerns related to all forms of trafficking in human beings²</i></p> <p>Compiling information and ensuring access to reliable data is an essential aspect to evaluating and monitoring services/responses. The OCTF victim profile report is a good example of making data available as are the reports compiled by the UK Human Trafficking Centre /National Crime</p>	<p>We recognise the need to increase and enhance knowledge in order to enhance our response. We believe this is inherent across each of the existing strategic priorities and that the strategy already includes specific objectives (such as the duty to report and the role of the Anti-slavery Commissioner) which will improve our understanding and our response. As such we have not accepted the recommendation for a further strategic priority, however we will continue to look for new opportunities to enhance our understanding of modern slavery and improve our response. We have emphasised the need for better access to</p>

² http://ec.europa.eu/home-affairs/doc_centre/crime/docs/trafficking_in_human_beings_eradication-2012_2016_en.pdf page 5

	<p>Agency. Unfortunately, Northern Ireland is hampered in its understanding of human trafficking because of the Home Office's reluctance to provide immigration-related data. While of course, modern slavery does not only affect migrants, there is an overlap between exploitation and immigration at times. Thus, the paucity of immigration data is an ongoing cause of concern and one that the Law Centre has raised with GRETA³, OFMDFM, NISMP and the Home Office.</p> <p>Law Centre recommends that Department of Justice consider introducing a fifth strategic aim relating to collecting data. In the alternative, Department of Justice could consider how to achieve this aim elsewhere in the strategy e.g. embed it into strategic priority 4 (partnership).</p>	<p>statistics and analysis specific to Northern Ireland and believe changes flowing from the NRM review will help deliver this.</p>
Belfast PCSP	<p>These are the right strategic priorities and each should be given adequate resourcing and focus.</p>	<p>Noted.</p>

³ <http://www.lawcentreni.org/Publications/Policy-Responses/GRETA-UK-evaluation-June-2015.pdf>

SINI	<p>YES</p> <p>SINI are in agreement with the four strategic priorities as providing a comprehensive approach to dealing with the issue.</p>	Noted.
BMEWN	<p>While these strategic priorities are broadly acceptable - being in line with international discourse on a 'four Ps' approach – it should be emphasised that protection and support will be afforded to victims regardless of their national origins.</p> <p>It is notable that the chance of a positive reasonable grounds decision, and thus access to support, varies significantly depending on the potential victim's country of origin. This trend is most noticeable regarding European and non-European states.</p> <p>For example, in 2014 only 2% of Slovakian and 6.9% of Albanian referrals received a negative reasonable grounds decision, whereas 14% of</p>	<p>Noted - It would not be appropriate for a strategic priority to have this level of detail.</p> <p>Support is provided to potential victims of human trafficking, during the Recovery and Reflection period, regardless of their nationality, in line with international requirements under the EU Trafficking Directive.</p> <p>Conclusive determinations under existing NRM arrangements are currently the responsibility of the 2 UK Competent Authorities. In addition the Home Office is currently piloting multi-agency decision-making panels in two areas and we await the</p>

	<p>Vietnamese and 21.3% of Chinese applicants received a negative decision.</p> <p>While it is accepted that positive decisions will depend on many different factors, it should be clear and transparent that victims will be afforded the same opportunity for protection and support irrespective of their national origins.</p> <p>The BMEWN recommends that the guidance provided to competent authorities emphasise that decision-makers should not allow an individual's country of origin to factor into their decision-making.</p>	<p>outcome and lessons learned from those pilots.</p>
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Strategic priority 1: Pursue

4(a). In your opinion are these proposed objectives appropriate? Are there any additional objectives that in your opinion should also be included?

Organisation/individual	Comments	DOJ response
Craigavon Trades Council	The objectives are appropriate.	Noted.

Northern HSCT	YES There is a need that this is recognised at all levels in statutory agencies, NIHE, Trusts, PSNI and Education.	Agree that human trafficking and slavery needs to be addressed at a multi-agency level. A programme of targeted awareness is in place and will be continued through this strategy.
	There is the need to know information from the last port, people, telephone, documents, in order to effectively investigate.	Agreed. This is standard information gathered by the PSNI in a human trafficking case.
Women's Forum NI	YES – but we are concerned that there will not be adequate resources to implement them due to the present guidance constraints on the PSNI with particular reference to Community Policing.	PSNI acknowledges these concerns; however, a dedicated PSNI human trafficking team is now in place. Whilst there are competing pressures in policing, PSNI is satisfied that the dedicated team can achieve these objectives.
CARE NI	YES We agree that these objectives are appropriate.	Noted.
Armagh City, Banbridge and Craigavon Borough Council	YES We welcome an approach that provides greater clarity on the legislation; strengthens the legislative basis and leads to pro-active human trafficking investigations.	Noted.
	Prevention work in source countries could usefully be implemented to further try and reduce	The strategy is aligned with the UK-wide Modern Slavery Strategy. One of the commitments in the

	victimisation.	Modern Slavery Strategy is to increase cooperation with international partners to better investigate and prosecute cases of modern slavery in source, transit or destination countries. We acknowledge the UK Government's lead responsibility on international relations and co-operation.
	It would be helpful to have a compensation process – such as a victim's fund.	Victims of human trafficking are eligible to apply for compensation under the Criminal Injuries Compensation Scheme. In line with section 20 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015, the Department has produced a leaflet and guidance notes to help victims of human trafficking to access compensation and complete a personal injury application form.
	Offences relating to non – sexualised child exploitation e.g. forced labour, being forced into theft also require clear recognition and guidance in the legislation.	Section 3 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 defines exploitation for the purposes of a human trafficking offence. This includes forced labour, forced begging and forced criminality.

	<p>Support clarification on data protection and clear meaningful protocols/MOU around safeguarding information and how information can be shared in the interests of detecting crime.</p>	<p>Noted.</p>
	<p>Collaborative work with the Information Commissioner, Safeguarding Board and Commissioner for Children and Young People in NI on providing advice, training and protocols in a timely manner for those involved working with children and young people e.g. PSNI, Education Authority, Accident and Emergency Staff, Social Services and Schools.</p>	<p>Significant body of work already undertaken in this respect under previous action plans as well as in response to the Marshall Report on child sexual exploitation.</p> <p>In addition, the training needs of HSC Trusts working directly with separated / trafficked children are addressed and met through a coordinated approach between the Regional Practice Learning Network for Separated / Trafficked Children and the HSC Regional Trainers Group. Training has been delivered on a multi -agency basis on themes of age assessment, cultural awareness, operational practice guidance and trafficking awareness, indicators etc. Training needs remain a live issue which can be addressed through the regional practice network and / or through each Trust's internal annual training programmes. It is important</p>

		that there is awareness within Trust Family and Childcare Services of the range of training initiative's available and to be delivered across a range of agencies through this strategy.
	There is also a fundamental role for community organisations, NGOs and Churches in helping to identify and support victims of traffickers which also require training.	Agreed. The strategy prioritises "partnership" and includes actions around awareness for community/youth groups, churches and other relevant groups.
	We support legislation based on similar premise to that used in the context of domestic violence, wherein if a victim is too frightened to make a statement, but there is enough evidence to investigate that this can be taken forward.	As set in section 14 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015, the investigation and prosecution of a human trafficking or slavery-like offence is not dependent on the victim reporting the offence or accusing a person of committing the offence. Proceedings for a human trafficking or slavery-like offence may be commenced or continued even if the victim of the offence has withdrawn any statement made in relation to the offence.
	Targeted approach to reducing risk with those groups who may be more at risk of trafficking.	Agreed. Strategic Priority 3: Prevent, includes an objective focused on continued engagement with at-

		risk groups. The Engagement Group has developed a programme of targeted awareness.
	Robust monitoring, review and evaluation of activity to reduce harm and publication of results, strategies for success.	Progress reports against the previous two year's human trafficking action plans were published on a biannual basis. Progress reports will also be published for this strategy and future strategies going forward.
Voice of Young People in Care	YES We welcome strategic priority 1: Pursue and believe the proposed objectives are appropriate.	Noted.
NISMP	We believe that although the objectives are appropriate, they are narrower in scope than what is required to achieve the aim of 'effective detection, disruption, investigation and prosecution of offenders'. While the aim suggests clear roles for law enforcement, public prosecution and the judiciary, the objectives and related actions are limited to law enforcement and PPS. Achieving effective prosecutions resulting in 'traffickers and enslavers receiving appropriate	We recognise the independence of the judiciary however under Strategic Priority 3 have committed to engaging with the Judicial Studies Board in relation to training on human trafficking.

	<p>punishment' (outcome against objective 4) will require a multi-disciplinary approach, which should include the direct involvement of the Judicial Studies Board in addition to law enforcement agencies and PPS.</p> <p>Extending the scope of the objective on training to include training for the judiciary and including the Judicial Studies Board as an integral partner in the delivery of the strategy would ensure that effective training, guidance and understanding is expected of all branches of the criminal justice system. This would promote a shared understanding of the nature of trafficking in Northern Ireland, of the legislative intent underpinning the Human Trafficking and Exploitation Act and of the actions required to deliver this as outlined in this strategy. This shared understanding should allow CJS to approach other agencies, whose actions and obligations can impact their work, and secure memorandums of understanding and expected</p>	
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	<p>responses. The assurance that all branches of the CJS are working towards the outcomes stated against the objectives for this strategic priority should encourage prosecutions which will test the robustness of the legislation which in turn could encourage more victims to agree to NRM referral.</p>	
	<p>Objective 3: We welcome the inclusion of GLA and DEL EIA as principal actors under this objective as it recognises the importance of improving intelligence sharing between criminal justice agencies and those agencies responsible for the oversight and enforcement of employment regulations.</p>	<p>Noted.</p>
<p>Belfast Trust</p>	<p>YES</p> <p>The Trust is of the view that the objectives detailed in the Draft Strategy relating to the Pursue priority are appropriate. In particular the Trust acknowledges the benefits of having a clear legislative basis to take forward this work.</p>	<p>Noted.</p>

	At this time the Trust has not identified any additional objectives and considers the objectives set as helpful and consistent with the Strategic priorities.	
Western Trust	<p>YES</p> <p>The strategic priority to “pursue” through effective detection, disruption, investigation and prosecution of offenders is welcomed. It is considered that the objectives proposed to achieve this priority seek to strengthen the multiagency effectiveness at targeting human trafficking at an early stage. It is necessary that the required legislative framework exists within Northern Ireland to support robust investigations and prosecutions. Training for appropriate professional and agencies is to be welcomed to gain a clearer understanding of the origins of human trafficking within and out of Northern Ireland.</p>	Noted
	However, training needs to be extended beyond	As noted there are established mechanisms within

	<p>law enforcement, the effective and targeted training of health and social care staff is important, as they may be a first point of contact for potential victims. Through awareness raising such professionals may be able to more easily identify victims and potential offenders. They need to be aware of how they should share and process information should they be concerned, which ultimately feeds into the investigative process. They may be in a prime position to give a professional account of individual circumstances, impact on victim and activities of offenders, which could lead to successful disruption and prosecution.</p>	<p>HSC Trusts and regionally to identify uni / multi professional training needs relating to adults and children who are potential / actual victims of trafficking.</p>
IJM	<p>We agree that strong enforcement of the law around human trafficking is a key element to tackling and reducing the crime, therefore, we feel these objectives are both important and appropriate. We believe, particularly, that prosecutions of offenders are crucial in creating a robust deterrent. In order for this to happen,</p>	<p>Noted.</p>

	<p>there needs to be strong collaboration between the PSNI and the PPS as well as other key agencies.</p> <p>It is encouraging that whilst there have only been three convictions in NI for human trafficking offences, there have also been convictions for related offences, and convictions in Scotland and Sweden in cases related to this jurisdiction. This reflects collaboration between jurisdictions which is encouraging.</p>	
Paula McVeigh	YES	Noted.
HSCB	<p>YES</p> <p>The objectives identified appear to support the strategic aim of “pursue”</p>	Noted.
NICEM	<p>As has been noted above, forced labour is the main purpose for which identified victims of trafficking have been brought to the UK. Consequently, employment inspection is vital to ensuring that perpetrators are identified and prosecuted.</p>	<p>The OCTF Subgroup provides a forum for appropriate coordination between relevant organisations. Membership is kept under review and HMRC has recently been invited to join. The strategy remains focused on the more serious end of the spectrum of exploitation, though we recognise</p>

	<p>However, the employment monitoring system that operates in NI is fractured and incomplete. The Gangmasters Licensing Authority, which has the most well-developed approach to identifying instances of trafficking, is only authorised to oversee working practices within the agricultural, shellfish-gathering and related packaging industries, as per Section 3 of the Gangmasters (Licensing) Act 2004.</p> <p>Additionally, the Employment Agency Inspectorate only monitors the practices of employment agencies in terms of their compliance with the Conduct of Employment Agencies and Employment Businesses Regulations (Northern Ireland) 2005.</p> <p>Consequently, the working practices of many employment sectors in NI are not overseen by an employment monitoring body. Naturally, this piecemeal coverage severely limits the capacity of the State to identify victims of trafficking for the purpose of forced labour and renders the</p>	<p>the need for appropriate engagement with a wide range of bodies overseeing labour practices and will pursue appropriate engagement.</p>
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	<p>identification of these victims largely dependent on the work of law enforcement agencies, which can generate additional expense.</p>	
	<p>Indeed, the NI approach to identifying victims of trafficking is heavily police dependent, with 80% of NI referrals to the NRM in 2014 being made by the PSNI. Arguably, employment monitoring bodies are being significantly underutilised as a potential source of passive victim identification, resulting in an overdependence on costly policing operations in order to identify victims and thus potential offenders.</p> <p>NICEM recommends that an objective be added to improve detections through the better utilisation of employment monitoring bodies.</p>	<p>We recognise the role that others can play, however within law enforcement PSNI has the lead responsibility for responding to trafficking and slavery offences. In addition, PSNI is a First Responder and therefore referrals may be made by PSNI following previous engagement with other monitoring bodies.</p> <p>Good links already exist, although we recognise the need to build on these through the “Partnership” strand of this strategy.</p>
Law Centre NI	<p>In order to ensure that Objective No.4 of Strategic Priority 1 is achieved (i.e. <i>effective investigations and prosecutions</i> occur), we recommend that training of the judiciary is inserted as an identified action.</p>	<p>We recognise the independence of the judiciary however under Strategic Priority 3 have committed to engaging with the Judicial Studies Board in relation to training on human trafficking.</p>

	<p>Action 2 contained within Objective No. 4 is to “<i>Develop Memoranda of Understanding with An Garda Siochana and with the Irish National Employment Rights Authority (NERA)</i>”, with the identified owner being the GLA. We recommend that the PSNI, Department of Justice and the DELNI should also be involved in developing the Memoranda of Understanding with An Garda Siochana and NERA so as to ensure effective investigations and prosecutions.</p>	<p>Effective arrangements are already in place for co-operation between PSNI and AGS, including a cross-border policing strategy.</p>
	<p>In relation to Objective No. 7 (“<i>pursue criminal finances of traffickers and enslavers</i>”), we wonder if it would be feasible for Department of Justice to commit to reinvesting all confiscated criminal assets into anti-trafficking efforts and victim support. This would be a symbolic gesture in which some victims might take solace.</p>	<p>Where funding is available under the ARCS scheme and where a convincing case is made the Department has a track record of providing funding for anti-trafficking projects and training from confiscated criminal assets. We recognise that victims of other crimes should also have recourse to such funding though and so do not believe it is appropriate that all such funding should be directed towards anti-trafficking measures. We do however emphasise the new measures in the 2015 Act which provide greater powers for courts to order</p>

		perpetrators of modern slavery offences to pay reparation to their victims.
Belfast PCSP	These proposed objectives are appropriate, however it is strongly suggested that the 'pursue' priority should also link with national efforts to develop relations with international partners in transit and source countries. There should be a focus on targeting traffickers before they reach NI, thus preventing more people from becoming victims in the first place.	The strategy is aligned with the UK-wide Modern Slavery Strategy. One of the commitments in the Modern Slavery Strategy is to increase cooperation with international partners to better investigate and prosecute cases of modern slavery in source, transit or destination countries. Whilst we will continue to build links where appropriate and possible, we recognise the UK Government's lead responsibility on matters relating to international relations and cooperation.
SINI	YES SINI welcomes an approach that provides clear legislation; strengthens the legislative basis and leads to pro-active human trafficking investigations.	Noted.
	SINI suggests that there should be some prevention work carried out in the trafficked victim home countries so as to prevent them looking for a better future.	One of the commitments in the UK's Modern Slavery Strategy is to increase cooperation with international partners to better investigate and prosecute cases of modern slavery in source, transit or destination

		countries. We recognise the UK Government's lead responsibility on matters relating to international relations and cooperation.
	More collaborative work within the statutory agencies in Northern Ireland – particularly around the sharing of information.	Partnership working is a priority for us. The OCTF Immigration and Human Trafficking Subgroup provides a forum for collaborative working and information sharing.
BMEWN	The BMEWN considers these objectives to be broadly reasonable, although it would recommend further actions to implement them, as detailed below.	Noted.

Strategic priority 1: Pursue

4(b). In your opinion are these proposed actions appropriate? Are there any additional actions that in your opinion should also be included?

Organisation/individual	Comments	DOJ response
Craigavon Trades Council	Understanding the role of the internet is vital when looking into monitoring and therefore disrupting trafficking and exploitation. The role played by recruitment agencies should also be looked into.	Agreed. The Strategy already includes an action focused on the development of understanding of online recruitment.

Women's Forum NI	It is essential that funding remains in place for those organisations providing support for victims.	Section 18 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015, places a <u>statutory duty</u> on the Department of Justice to provide assistance and support to adult potential victims of human trafficking, in line with our international obligations under the EU Trafficking Directive.
CARE NI	<p>YES</p> <p>We agree that these actions are appropriate. We do have some further comments to make however:</p>	Noted.
	<p>Under point 4, "Effective investigations and prosecutions", we would ask if the PPS could commit to a target date for the introduction of new prosecutorial guidance for prosecutors of human trafficking offences in light of the introduction of the Human Trafficking and Exploitation Act. We feel that it is important that the PPS introduce new guidance to reflect the new legislative situation.</p>	<p>Since the commencement of the Act, PPS has already produced and issued guidance to prosecutors as follows:</p> <p>Staff Instruction – Guidance on the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.</p> <p>Staff Instruction - Suspects in a criminal case who might be victims of trafficking or slavery. This provides guidance to prosecutors who are considering cases in which a person suspected of</p>

		<p>committing a criminal offence may be a victim of human trafficking or slavery. It includes the defence provided for in the 2015 Act as well as the common law defence of duress and the importance of the Public Interest in such cases and explains the process to be followed by prosecutors in such cases.</p> <p>The overarching PPS Policy for Prosecuting Cases of human trafficking is presently under review.</p>
	<p>We are very supportive of the building of effective and close links between the PSNI and An Garda Síochána, but we would ask whether the PSNI should consider building close and effective links with police forces in Great Britain as well as the Republic of Ireland.</p>	<p>PSNI is represented on a police national group which bring together all police forces in the United Kingdom and is chaired by the Chief Constable with the national lead for human trafficking.</p>
	<p>There seems to only be one mention of the newly operational National Crime Agency with regard to the “pursue” section. This is in relation</p>	<p>The strategy is aligned with the UK-wide Modern Slavery Strategy which states that the NCA will lead, support and coordinate the law enforcement</p>

	<p>to the gathering and analysis of intelligence, not in terms of what impact (if any) they would have in terms of tackling organised crime with regard to human trafficking. We would ask the Department to reflect on whether further mention of the NCA should be made in this section of the strategy.</p>	<p>response to modern slavery. Whilst PSNI retains the operational lead within Northern Ireland it has already an effective working relationship with NCA.</p>
	<p>We would ask the Department to consider the addition to the strategy of action points in relation to joint investigations or cooperation with the NCA or other police forces in the UK, where appropriate, in a similar fashion to the action points about joint investigation teams with other EU countries and cross-border policing actions.</p>	<p>Agreed. The final strategy now includes an action around continued cooperation with the NCA and other police forces in the United Kingdom.</p>
Northern HSCT	<p>YES</p> <p>The policy states that trafficked people should be returned to the port of entry into Europe, however, this does not happen.</p>	<p>Northern HSCT has clarified that the policy referred to is the Dublin III regulation. The Dublin III Regulation (Regulation 604/2013) establishes the criteria for identifying the (Member) State responsible for the examination of an <u>asylum claim</u> in Europe. Issues relating to Asylum are reserved</p>

		and therefore outside the scope of this strategy.
NISMP	We suggest that the 8th action listed under this objective is expanded to include other agencies which have responsibility for this oversight and enforcement e.g. HMRC, DARD.	Action is currently for GLA, PSNI, DEL and EIA to develop a Memorandum of Understanding for the exchange of operational learning in order to identify cases of trafficking/forced labour, ensuring all cases are recorded in order to identify trends. Engagement with other agencies will take place as necessary.
Armagh City, Banbridge and Craigavon Borough Council	YES There is a need for specialist child protection and fostering service, to include dealing with the legacy of trauma and potential mental health impact.	HSCB has responded: From a childcare perspective there is ongoing training for staff and carers to build competency and understanding of the holistic needs of children who are in need of protection and / or who become looked after. As well as staff and carers being assisted through training to understand the impact of trauma on emotional and mental well being specific services are in place to complement interventions and to support carers, for example, CAMHS, Looked After Children Therapeutic Services. There is also increasing emphasis on the development of

		<p>specialist foster care placements providing intensive wraparound support to those children with complex difficulties. There is currently a review of fostering and residential services being undertaken across Trusts which should identify gaps and how Trusts plan to address these within these review processes.</p>
	<p>Highlight the role of community groups and NGOs, promoting community spirit, neighbourliness in Northern Ireland, acting as community “eyes and ears” – need to promote the signs and symptoms in order to assist people identify and know what signs to look out for. Raise awareness of local case studies as people often have common myths and misconceptions of what constitutes human trafficking.</p>	<p>Agreed. The awareness raising activities of members of NGOs represented on the Department’s Human Trafficking Engagement Group are regularly publicised. The Department and its statutory and civil society partners actively work to make the public aware of the signs and indicators of human trafficking and will continue to do so through this strategy. NGOs use case studies as examples in their awareness raising activities. For example, the UN Gift Box contains personal stories for victims recovered in Northern Ireland and a composite of cases encountered by Law Centre NI has been the subject of a short film which has been used for</p>

		training and awareness purposes.
	Specific training is required for social services staff, PSNI and those who come into direct contact with victims in order to provide clear referral frameworks and pathways of intervention and support.	Agreed. Training and awareness has already been delivered. In addition, The strategy contains the following action: Continued awareness raising/training with key sectors such as: <ul style="list-style-type: none"> • medical; • legal; • law enforcement; and • social work.
	Training for employment providers and those with responsibility for developing/enforcing employment regulations in order to identify issues and implement practical guidance and intervention as required.	PSNI will provide an awareness session to the DEL Employment Agency Inspectors and GLA. It is anticipated that this will be held in the Autumn. DOJ and EAI have also already developed and provided awareness materials to recruitment agencies.
	In addition training for the judiciary is pivotal to ensure enhanced effectiveness within the overall criminal justice process.	We recognise the independence of the judiciary however under Strategic Priority 3 have committed to engaging with the Judicial Studies Board in relation to training on human trafficking.
Voice of Young People in Care	YES VOYPIC welcomes the emphasis on effective and robust criminal law provisions to facilitate	Noted.

	<p>investigations and prosecutions and a robust sentencing framework focusing on pursuing perpetrators.</p>	
	<p>We believe that many of characteristics of trafficking, slavery and forced labour parallel with that of child sexual exploitation. The perpetrators target vulnerable people to traffick in the same way perpetrators target vulnerable children and young people to sexually exploit. Perpetrators target specific groups of vulnerable children and young people and children and young people in care, in particular those in residential care, are more vulnerable to child sexual exploitation. In our response to this consultation we will draw on our experience of engaging with young people as part of the Marshall Inquiry into child sexual exploitation.</p> <p>In 2014, VOYPIC carried out a series of workshops with children and young people in care and care leavers as part of the Marshall Inquiry into Child Sexual Exploitation. The young</p>	<p>Noted. We recognise the link between human trafficking and CSE. In addition to this strategy DOJNI has developed an action plan on tackling CSE, based on recommendations made by the Marshall Report.</p>

	<p>people we consulted with emphasised the importance of pursuing and prosecuting perpetrators. Another insight reflected was how the focus for both information and media spotlight is often on the victim of exploitation rather than the perpetrator or alleged perpetrator. They said that messages about CSE should be about its criminality and should warn perpetrators that will be pursued and prosecuted:</p> <p><i>“There are no messages being promoted for the perpetrators.. what is their message? It is all well and good that young people are being educated about CSE but the perpetrators will always find someone”</i></p>	
	<p>We also welcome the emphasis on effective training for law enforcement. During our consultation with young people, they highlighted the importance of training for all professionals across the sector. They said that it is important that children and young people are involved in developing strategies and training professional to</p>	<p>Noted.</p>

	<p>respond to those in danger of being exploited. They believe this would ensure a more effective and meaningful response and help prevent children and young people being exploited.</p>	
British Red Cross	<p>The Red Cross suggests that actions relating to training are developed to more comprehensively reflect the Group of Experts on Action Against Trafficking in Human Beings recommendation to: ‘...continue ensuring that all relevant staff, including those working in NGOs contracted to provide assistance to victims of trafficking, are trained periodically in order to improve the detection of potential victims of trafficking, the formal identification of victims and the provision of assistance to them. Such training should be provided to law enforcement officers, immigration officials, staff working in immigration removal centres, staff working in shelters for victims of trafficking, local authorities’ staff, diplomatic and</p>	<p>We believe the actions and training provisions are in line with the GRETA recommendations and build on previous work already that has already been carried out to implement GRETA under the two previous Northern Ireland Action Plans.</p>

	consular staff, health professionals, social workers and labour inspectors.’ ⁴	
Belfast Trust	<p>YES</p> <p>The Trust is of the opinion that all actions associated with the objectives set appear to be appropriate. Objective 3, improving the gathering and sharing of intelligence and ensuring effective analysis, details a number of actions which the Trust particularly welcomes. These include continued meetings of the OCTF, immigration and Human Trafficking subgroup and NSPCC providing management information on N.I. calls to Modern Slavery Helpline. The Trust recognises the importance of gathering key information to inform learning and service development and the need to do this in a manner which ensures confidentiality of individual victims.</p>	Noted.
Western Trust	<p>YES</p> <p>The identified actions as set out in the strategy</p>	Noted.

⁴ As above, note 8, para 126.

	appear to support the enhancement of collaboration from the multiagency team within the criminal justice context.	
	However, children's services expressed a view that the actions should be clearer with specific information on where the full time PSNI investigative team is based, who leads this, and relevant contact information, to ensure that there is no ambiguity.	PSNI has a dedicated Human Trafficking Unit, however, we do not believe that specific details for PSNI lead investigative teams should be included on the face of the strategy.
	Similarly there should be designated individuals within health/ social care or housing who should be included in any joint training. In doing so, awareness raising is likely to maintain momentum, relevant information disseminated back to relevant organizations, and a greater emphasis placed on holistic shared accountability.	HSCB has responded: Training to date, coordinated through the regional practice learning network for separated / trafficked children has been targeted to key cohorts of staff within HSC Trusts and across other agencies who are directly and specifically involved in working with separated / trafficked children. Such a targeted focus will be maintained as required and based on identified learning needs and training needs analysis.
IJM	YES	Affordability is an issue. We have had to prioritise

	<p>We feel the actions set out are appropriate and would make the following comments:</p> <p>Whilst it is encouraging that guidance will be put in place for the PSNI in relation to new operational powers and a Code of Practice drafted relating to the use of new maritime enforcement powers, it is also pertinent that training be developed and carried out in relation to this guidance.</p>	<p>actions in the strategy. PSNI have already received training and information materials on the new provisions in the 2015 Act.</p>
	<p>We agree that information sharing is important and will be interested to see how such between European countries and between Migrant Help, Migration Research and DOJ can work.</p>	<p>Noted.</p>
	<p>We are particularly pleased to see that an MOU will be developed to identify trends in cases.</p>	<p>Noted.</p>
	<p>As well as an MOU and training with An Garda Siochana, do we need something similar with the Police in Scotland and other jurisdictions?</p>	<p>PSNI is represented on a police national group which bring together all police forces in the United Kingdom and is chaired by the Chief Constable with the national lead for human trafficking.</p>
	<p>Appropriate and continued training for the PSNI is important. IJM's Director of Investigations who</p>	<p>Training is an ongoing priority. We recognise the importance of it, however good progress has already</p>

	has worked around the world on this issue will be meeting with personnel from the PSNI in October and perhaps this will be a useful conversation in identifying training needs.	been made.
	Important to look into online recruitment, but we must not forget the other types of recruitment as well. – how can we assist other countries in tackling those (job ad’s, personal recruitment via middleman etc)?	Noted.
Paula McVeigh	YES but perhaps further actions could also be taken. Cross-border data sharing between agencies would be required, not simply scope the potential for such sharing.	Comments refer to the action “Scope the potential for European information sharing.” Preparatory work is needed before the implementation of any data sharing arrangements across differing jurisdictions.
HSCB	The actions noted all appear to be appropriate. However, we are conscious that some of these, eg the implementation of any Order or regulations under Section 13 (duty to notify) and Section 43 (duty to co-operate with the Commissioner) will have implications for Health and Social Care organisations.	A targeted consultation on the Draft Statutory Rule: The Modern Slavery Act 2015 (Duty to Co-operate with Commissioner) (Northern Irish Public authority) Regulations (Northern Ireland) 2015 will close on 20 October 2015. DHSSPS and HSCB have been asked to consider.

	<p>We would therefore ask that the timescales for implementation/enactment reflect the inter-agency nature of these requirements.</p> <p>In the meantime, the HSCB would welcome the opportunity to work with the DoJ on the detail of these actions, alongside colleagues from the DHSSPS and the Safeguarding Board for Northern Ireland (SBNI).</p>	<p>A short targeted consultation on the implementation of Section 13 of the Human Trafficking and Exploitation Act (NI) 2015 will be launched shortly and we envisage that an SL1 will be brought to the Justice Committee in November 2015. DHSSPS, HSCB and SBNI will be consulted.</p>
NICEM	<p>If employment monitoring bodies are to be utilised to facilitate the detection of instances of trafficking, then additional actions will be required. Staff on employment monitoring bodies will require training so that they may identify potential victims of trafficking and alert the PSNI. The potential format for such training has been noted above.</p> <p>Furthermore, in order to facilitate interactions between employment monitoring bodies and the PSNI – and thus support the pursuit of traffickers - representatives from each body (including the Employment Agency Inspectorate, the Health</p>	<p>Membership of the OCTF Immigration and Human Trafficking Subgroup will be reviewed in October 2015. HMRC has recently been invited to join the subgroup. We also recognise the need to build on the effective links already in place.</p>

	<p>and Safety Executive, Her Majesty's Revenue and Customs and the Agricultural Wages Board) should attend the meetings of the Organised Crime Task Force's Immigration and Human Trafficking Subgroup. This could help keep employment monitoring bodies informed on current issues, such as what employment sectors are of interest to law enforcement authorities and what practices they should be alert to.</p> <p>This could also foster information-sharing between employment monitoring bodies to better detect instances of trafficking. For example, if the Agricultural Wages Board received a complaint regarding an employer that the Health and Safety Executive had recently found to be in violation of safety standards, this could warrant further attention from law enforcement bodies depending on the context of the employer's conduct.</p> <p>Furthermore, ensuring representation from these</p>	<p>Effective communication channels are already in place to report concerns to the PSNI.</p>
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bodies on the Subgroup could also develop a synergistic relationship between their work. For example, if the Health and Safety Executive had noted characteristic health and safety violations at a workplace, the Employment Agencies Inspectorate could be notified that it should pay particular attention during an upcoming inspection.

In this way, the work employment monitoring bodies could support the pursuit of traffickers as a part of their current duties, in a manner that complements the work of law enforcement agencies and reduces the reliance upon policing authorities to make initial detections.

NICEM reemphasises its above recommendation on training for employment monitoring bodies and further recommends that the Strategy's action plan include a measure to ensure that the OCTF's Immigration and Human Trafficking Subgroup has representation from all of the

	employment monitoring bodies active in NI.	
Belfast PCSP	Work with overseas governments, international law enforcement agencies such as INTERPOL, Europol and local law enforcement in source countries to disrupt criminal networks abroad.	The strategy is aligned with the UK-wide Modern Slavery Strategy. One of the commitments in the Modern Slavery Strategy is to increase cooperation with international partners to better investigate and prosecute cases of modern slavery in source, transit or destination countries. However PSNI has a track record of working effectively with other international law enforcement agencies to tackle modern slavery.
	Contribute to greater awareness raising in source countries about the dangers of trafficking, to help reduce the supply of potential victims. Evidence suggests that some countries top the list repeatedly as areas of concern for trafficking. The development of relations should focus on those transit and source countries from where the greatest threat originates.	As above. We recognise the UK Government's leading role on matters relating to international relations, as well as the role of the UK Anti-slavery Commissioner in respect of engagement with international diplomats.
	Diplomatic engagement could help in encouraging and brokering disruption activity against traffickers.	As above.

	<p>Increase our understanding of how and why people become victims of trafficking.</p>	<p>We are currently working on legislation to implement the duty to notify about suspected victims of human trafficking or slavery offences. This is intended to enhance our understanding of human trafficking and slavery-type practice in Northern Ireland.</p>
	<p>Work with airline industry / ports to enhance their knowledge of human trafficking and provide their staff with the tools needed to identify the behavioural indicators associated with trafficking.</p>	<p>Along with partners on the Engagement Group and OCTF subgroup we have already provided some awareness materials and briefings. We recognise too the role of UK Border Force (which is a member of the OCTF subgroup) in identifying potential victims entering the UK. We will look for further opportunities to build on the work already progressed.</p>
	<p>Stronger enforcement, offenders seem to perceive trafficking as a ‘low risk’ crime because of the relatively low risk of being caught, as such the risk to traffickers remains too low, and the profits they can generate are too high. By reversing this, and disrupting their activity, increasing the risk of being convicted, and seizing their criminal profits, will help tackle</p>	<p>Noted. We believe that the new legislative framework for trafficking and slavery sends out a strong message that these are not “low risk” crimes. The maximum sentence for a trafficking or slavery offence is now life imprisonment. In addition the 2015 Act introduced statutory aggravating factors which must be taken into account when sentencing as well as new minimum sentences for modern</p>

	<p>human trafficking. There needs to be significant coordination of law enforcement responses to maximise the risk to offenders.</p>	<p>slavery offences.</p>
	<p>As part of Strategic Priority 1 (PURSUE) which relates to effective detection, disruption, investigation and prosecution of offenders, Belfast City Council believes robust enforcement action against perpetrators or facilitators of human trafficking should be a priority across the Criminal Justice Agencies. Council also believes that those agencies, in particular the PSNI, should be allocated adequate resources to facilitate the detection and prosecution of offenders.</p>	<p>Agreed. We believe that this is already the case. A dedicated PSNI human trafficking team is now in place. Whilst there are competing pressures in policing, PSNI is satisfied that the dedicated team can achieve these objectives.</p>
SINI	<p>YES</p> <p>SINI believes that there is a need to review the role of community groups and NGOs. Additional training of awareness raising, educating in what signs to look for, promoting community action and understanding.</p>	<p>We believe that the Engagement Group on Human Trafficking has been a model of best practice in tackling human trafficking through a partnership approach. A three-year review of the Human Trafficking Engagement Group is planned for December 2015.</p> <p>Work on training and awareness is ongoing</p>

<p>BMEWN</p>	<p>While the draft Strategy currently envisages some measures for cooperating with European States in investigating trafficking, it should be noted that trafficking is a global problem and international cooperation on a wider scale should be provided for.</p> <p>Concerning the ‘pursue’ priority of the draft Strategy, there are some further actions that could be taken to achieve the stated objectives. As has been noted by the Home Office in its briefing to Police and Crime Commissioners, trafficking is a global phenomenon and must be tackled on an international level.</p> <p>Consequently, as well as the cross-border and European initiatives envisaged in this part of the action plan, there should be an action committing to wider international collaboration. This could include international organisations that provide support for tackling trafficking; for example, Interpol supports police investigations of trafficking, providing specialised training and</p>	<p>Noted.</p> <p>The strategy is aligned with the UK-wide Modern Slavery Strategy. One of the commitments in the Modern Slavery Strategy is to increase cooperation with international partners to better investigate and prosecute cases of modern slavery in source, transit or destination countries. Where possible and appropriate, however, we will utilise existing mechanisms for international co-operation and seek to develop new links.</p> <p>Noted.</p>
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	<p>coordinating deployments of police and other actors in order to disrupt trafficking networks.¹² Collaborating with Interpol in this way could help satisfy the fifth objective under this priority.</p> <p>Furthermore, collaboration with other states should be guided by the available data on victims of trafficking and their countries of origin. For example, recent years have seen a significant increase in the number of victims being trafficked from Albania (19% of referrals to the NRM in 2014), therefore establishing a joint operation with authorities in this State could effectively target the networks that are generating a large proportion of the trafficking victims in the UK at their source, thus contributing to the satisfaction of the fourth objective under this priority.</p> <p>Additionally, the BMEWN notes with approval that the draft Strategy currently has an action on continuing to use applications for the restraint and confiscation of criminal assets in order to</p>	<p>Noted</p>
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	<p>combat trafficking.</p> <p>However, it is also important to consider the value of the financial aspect of human trafficking as an investigative tool. The US Department of the Treasury has developed financial 'red flag' indicators so that suspicious financial activity, such as numerous sizeable cash deposits across multiple accounts, is identified and reported to the police by the financial sector. Based on this approach, Europol is currently developing a similar set of 'red flag' financial indicators for banks in Europe.</p> <p>Consequently, there is value in ensuring that bank accounts and bank transfers are used as a tool for investigating traffickers. It should be ensured that the financial sector is adequately briefed on what activity should be reported to the police and that future Europol 'red flag' financial indicators are adequately disseminated and implemented into the police response in NI.</p> <p>Action in this area could help satisfy the seventh</p>	
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	<p>objective under this priority.</p> <p>The BMEWN recommends that the finalised Strategy commit to international collaboration in investigating human trafficking through international organisations, including Interpol. Cross-State investigations should also be established in response to data trends on victims’ country of origin.</p> <p>It is also recommended that the financial sector be briefed on suspicious activities that may be indicative of human trafficking operations and which should be reported to the police. The finalised Strategy should commit to implementing Europol ‘red flag’ financial indicators upon their creation.</p>	<p>PSNI is already committed to utilising such mechanisms for international cooperation where appropriate.</p> <p>Noted. We will give consideration to how this recommendation can be incorporated into future strategies.</p>
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Strategic priority 2: Protect and Support

5(a). In your opinion are these proposed <u>objectives</u> appropriate? Are there any additional objectives that in your opinion should also be included?		
Organisation/individual	Comments	DOJ response
Craigavon Trades Council	These objectives are appropriate as long as the only consideration is what is best for all victims.	Noted. The strategy has a victim-centric focus.
	Craigavon Trades Council has concerns that some groups may wish to concentrate and highlight certain aspects of trafficking for their own agenda.	Noted.
	Craigavon Trades Council also notes with disappointment that the UK has not ratified the 1990 UN convention of migrant workers' rights. We feel this showed a lack of commitment to tackle this issue due to the global economies reliance on cheap labour. Craigavon Trades Council remains disappointed at the Assembly's position on this convention as is designed to combat the very forms of exploitation and dependence that human trafficking relies on.	Noted.
Women's Forum NI	YES.	Noted.
CARE NI	YES	Noted.

	We agree that these objectives are appropriate.	
Northern HSCT	<p>YES</p> <p>There is a need to raise awareness of the Children (Learning Care) Act (NI) 2002 in respect of many of these victims who will become Looked After. There are support implications once they reach the age of 18.</p>	<p>The regional practice learning network for separated children is a structure and mechanism for identification of any training needs. This issue will be addressed at the next meeting of the network. The comment does highlight the need for enjoined working with adult services where looked after separated / trafficked children reach 18, and / or where a young person's reported age is under 18 but through age assessment is identified as over 18. HSCB will internally discuss and address.</p> <p>It is noted that there is a need for clear working arrangements between Children's and Adults Services where trafficking concerns exist for parents with children. Objective has been revised to include specific reference to young people. Revised wording is: "Provide protection and support services to children and young people who are victims of human trafficking".</p>
Armagh City, Banbridge	YES	

and Craigavon Borough Council	There is a need to support those victims who choose to tell their stories, in order to seek prosecution against traffickers and raise awareness of the issues they face – gives greater confidence to other victims to come forward and helps the public to better understand the complexity of the issues that can be involved.	Agreed. The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 made provision aimed at ensuring greater protections for victims of slavery-like offences and human trafficking during police interviews in the course of criminal investigations.
	Need for clear defined support processes for those who choose to stay.	Agreed. Provision is in place.
	Support services for victims in giving evidence in court are an important factor in terms of bringing forward prosecutions, and also identifying outcomes for victims, so these can be used for developing future interventions.	Agreed. The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 amended the Criminal Evidence (Northern Ireland) Order 1999 to ensure that victims of human trafficking and slavery-like offences are automatically eligible for special measures in court when giving evidence.
	Work closely with Education Authority and DHSSPS to identify risk factors and support young people who are potentially at greater risk of being trafficked locally. This may include mentoring approaches and support services for	Some of this is covered by objectives under Strategic Priority 3 Prevent . We are also advised that, beyond the scope of this strategy, work is being taken forward by DHSSPS on the development of a Looked After Children

	<p>Looked After Children, young people who are care experienced and use of the Family Support Hubs and Children and Young Peoples Strategic Partnerships to intervene early and provide systemic approaches to building resilience amongst vulnerable young people.</p>	<p>Strategy.</p>
	<p>Judiciary and all aspects of the criminal justice system need to perform a pivotal role through all stages of the process from identification through to outcomes.</p>	<p>Agreed. The Department will continue to raise awareness of human trafficking and slavery across the Criminal Justice System.</p>
	<p>Long term support networks could usefully be developed to support integration/reintegration into the community.</p>	<p>Flourish NI, an NGO represented on the Department's Human Trafficking Engagement Group, works directly to provide support to adult victims post NRM and to those who choose not to enter the NRM.</p> <p>Flourish works directly with victims to empower them to determine their own futures and assist in engaging fully within wider society.</p> <p>An action has been added to the strategy to reflect Flourish NI's role.</p>
	<p>Targeted approach to raising awareness with</p>	<p>Agreed. The strategy includes an action around</p>

	young people, through youth services, colleges, universities etc.	engaging in workshops within Secondary Education, University/College Students Youth Clubs, Youth Events etc.
Voice of Young People in Care	YES We welcome strategic priority 2: Protect and Support and believe the proposed objectives are appropriate.	Noted.
NISMP	According to the Nov 2014 Home Office review of the NRM, many potential adult victims of trafficking do not consent to referral to the NRM. As the most comprehensive and appropriate support is only available to victims who give their consent to NRM referral, we believe that there should be an additional objective under this priority to increase the number of PVOTs which consent to referral to the NRM. This will require actions which address the concerns of PVOTs in relation to referral (these will include fears for personal safety, as well as fears of removal from the UK if they feel their immigration status is vulnerable); an audit of training and processes to	We agree with the aspiration of more PVOTs agreeing to a referral. Many actions are already in place to increase confidence in the justice system, for example, the statutory defence for slavery and trafficking victims in relation to certain offences. Matters relating to immigration status are reserved and DOJ has no powers to act on this issue.

	ensure that these are tailored where necessary for groups identified as at-risk and longitudinal tracking of outcomes for victims to inform the development of identification and support systems.	
Belfast Trust	<p>YES</p> <p>The Trust is of the view that the objectives detailed in the Draft Strategy in relation to the Protect and Support priority are appropriate and cover the range of measures required. The objectives in relation to providing protection and support services to children and the objective in relation to providing protection and support services to potential victims going through the NRM are particularly significant from the Trust perspective.</p> <p>At this time the Trust has not identified any additional objectives and considers the objectives set as helpful and consistent with the Strategic priorities.</p>	Noted
Western Trust	YES	Noted.

	<p>The strategic priority to enhance effective protection and support and improved identification of victims is welcomed. It is considered that the objectives proposed to achieve this priority are helpful.</p>	
	<p>It may be useful to consider clarification of wording of the objective 4 projected outcome “Front line practitioners able to <u>advise</u> victims of their rights and entitlements.” The word advice infers that the front line practitioner will go through the individual case detail as opposed to signposting to another agency for the advice. An alternative wording could be “front line practitioners are able to signpost to DoJ funded support services such as Women’s Aid and Migrant Help regarding advice and entitlements.”</p>	<p>Agreed – wording has been amended in the strategy.</p>
	<p>The Western Domestic Violence Partnership agrees with the objectives under “Protect and Support” priority. In terms of improving victim identification and support the WDVP has already</p>	<p>Noted.</p>

	<p>protocols in place where WDVP partners and members are aware of required response when a potential or actual victim of trafficking and exploitation is identified through their contact with other social partner agencies such as community and voluntary sector support agencies. Cascading information and referral pathways through fora such as the domestic and sexual violence partnership means that awareness raising and required responses are enhanced.</p>	
IJM	<p>YES</p> <p>We believe these objectives are appropriate and make the following comments:</p> <p>We have found that the needs of those who have been victims of human trafficking are many and complex, ranging from physical needs to psychological support to support in minimising the risks of re-exploitation. Therefore, it is paramount that we address their needs with a victim-centred approach.</p>	<p>Agreed – the strategy has been developed around the needs of victims.</p> <p>Section 18 of the Human Trafficking and Exploitation Act also requires a victim-centred approach to be adopted in relation to support.</p>

	Language can be important and we find that labelling people as ‘victims’ can reinforce that identity. We have found the use of the term ‘survivors’ to be helpful.	We have adopted the language used in the EU Directive on preventing and combating trafficking in human beings and protecting its victims.
	Whilst it is extremely beneficial when those who have been victimised take part in the criminal justice system, any help and assistance they receive cannot be dependent upon this co-operation.	Assistance and support during the Recovery and Reflection period is not dependent on cooperation with the Criminal Justice System. This is in line with the requirement under the EU Directive on preventing and combating trafficking in human beings and protecting its victims and section 18 of the Human Trafficking and Exploitation Act.
Paula McVeigh	YES	Noted.
HSCB	YES In our view, these objectives are appropriate.	Noted.
NICEM	While the currently proposed objectives are important, it is necessary to note the role of NGOs in helping to protect and support victims. While the consultation document makes mention of Migrant Help and Women’s Aid - as organisations providing assistance as part of the NRM – it does not make mention of NGOs that	We recognise the role of NGOs and strong links already exist. NGOs are encouraged to report any suspicions to the directly to the PSNI. NGOs represented on the Human Trafficking Engagement Group are delivery partners in the Strategy.

	<p>may encounter trafficking victims during their work.</p> <p>Considering the changes being made to the NRM following its recent review and the likely alteration to the role of NGOs in this process, it is important for the Department to take this opportunity to maintain links between NGOs and future referral mechanisms, in order to support the identification of victims.</p> <p>It is notable that the maintenance of links between civil society and Government bodies as a means of facilitating victim identification is internationally recognised as being central to the protection and support of trafficking victims. Thus, the DoJ has an opportunity to draw on international best practice by ensuring that these links are maintained.</p>	
	<p>NICEM recommends that the objectives under this section be expanded in the finalised Strategy to include an objective to: ‘Maintain links between NGOs and relevant</p>	<p>We recognise and value the role of NGOs, we do not believe this further objective is necessary. Our ongoing commitment to maintaining these links is explicit in the 4th Strategic Priority – “Partnership”.</p>

	organisations, including those within the National Referral Mechanism’.	
Belfast PCSP	YES Additional objectives Tailored victim care: victim care is central to combating trafficking, consideration for the differing needs of victims, whether they are men, women or children is also essential in this strategy.	Agree with the observation, however this is already the case. Care for potential victims of human trafficking is based on assessed need, as required by Section 18 of the Human Trafficking and Exploitation Strategy.
	Victims must be provided with a tailored response that fits their vulnerability and helps bring their abusers to justice.	Agreed with the comment - provision in respect of specific needs is covered by section 18 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.
	Child trafficking victims: child victims are particularly vulnerable and the experiences they may have encountered are likely to have been extremely traumatic. All agencies involved in supporting and protecting these vulnerable children most have due sensitivity to their needs and experiences.	DHSSPS has commented that this is already the case.
	Effort must be made to minimise the impact on	DHSSPS has commented that this is already the

	<p>child victims and ensure they are not unnecessarily asked to recount their experiences to different agencies.</p>	<p>case. In addition the 2015 Act includes specific measures to protect child victims in the criminal justice system.</p>
	<p>Monitoring the quality of care: there is a need to track a victim through the system and monitor the quality of the service provided, to ensure appropriate victim care is maintained.</p>	<p>Noted. The strategy contains an action for DOJ to evaluate the support service contract.</p>
	<p>Discretionary Leave to Remain: the NRM process allows for residence permits to be issued to victims of human trafficking. Residence permits take the form of Discretionary Leave to Remain and allow the holder to obtain employment and to access the benefit system. Residence permits are valid for one year and are renewable. However it can be difficult to obtain a residence permit for a victim who is not, for whatever reason, actively cooperating with enforcement agencies. We would recommend that residence permits are not restricted to victims who are cooperating with enforcement agencies and that support and protection needs</p>	<p>Responsibility for awarding Discretionary Leave to Remain is a reserved matter and outside the scope of the strategy.</p> <p>Victims who are <u>not</u> assisting the police with criminal proceedings, but who need to remain in Northern Ireland for personal reasons, may be eligible for discretionary leave to remain, to be determined on a case by case basis.</p>

	<p>to extend to all victims whether they decide to engage with criminal proceedings or not.</p>	
	<p>Identifying victims in detention: there is a risk that potential victims of trafficking are not being identified at the Larne House Short-Term Holding Facility. There is a concern that the detainees may not be accessing specialist immigration advice. It is recommended that detention staff at Larne House are provided with adequate training and that there are adequate procedures for potential victims identified.</p>	<p>Training has been provided to staff in Larne House by NGOs represented on the Human Trafficking Engagement Group.</p>
	<p>Labour law enforcement: the figures show that trafficking for the purposes of labour exploitation is quite high. Therefore, labour law is an essential part of tackling human trafficking. However, NI's employment enforcement is fragmented with different agencies responsible for different types of violations. This brings the risk that some workers may not know which agency to approach. It is also extremely difficult for workers to enforce their employment rights</p>	<p>Recognise the need for effective enforcement of employment rights. This strategy's focus is on the very serious abuses of rights and freedoms that result in human trafficking or slavery servitude and forced or compulsory labour. Relevant agencies are represented on the OCTF subgroup and good channels of communication between agencies are in place.</p>

	<p>through the employment courts. It is fair to say that this process is hugely difficult for all workers but of even more difficult for trafficked workers. The concern is that, if employment laws are not rigorously enforced, then poor work practices can easily go on unchecked and create the conditions for exploitation to flourish.</p>	
SINI	<p>SINI supports all of the above – particularly when a victim chooses to tell his /her story. They also need to be assured that they will receive support if they decide to stay in N Ireland. This is really important for those who are prepared to go to court and stand up and give evidence to enable the law to prosecute.</p>	<p>Under the EU Trafficking Directive victims who are co-operating with criminal proceedings are entitled to support and assistance before, during and for a period of time after those criminal proceedings end.</p>
BMEWN	<p>The BMEWN considers these objectives to be broadly reasonable, although it would recommend further actions to implement them, as detailed below.</p>	<p>Noted.</p>

Strategic priority 2: Protect and Support		
5(b). In your opinion are these proposed <u>actions</u> appropriate? Are there any additional actions that in your opinion should also be included?		
Organisation/individual	Comments	DOJ response
Craigavon Trades Council	The training of enforcement and Immigration should be a priority and an assessment of whether on line training is the most effective way to improve identification.	Noted.
Women's Forum NI	Yes.	Noted.
CARE NI	<p>Yes, we agree with the proposed actions outlined. We have some further comments on the detail of the actions outlined:</p> <p>There is no clear reference to assisting victims with access or providing information during the reflection and recovery period (RRP) on longer term support following the RRP. The only reference to discretionary leave to remain is under point 3 in relation to victims assisting with criminal investigations. However, the Council of Europe Convention and Home Office Policy allows for the granting of discretionary leave in</p>	<p>Noted.</p> <p>The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 provides a discretionary power which ensures that the Department is able to continue to provide support to an individual beyond the point where a Conclusive Determination is made, where that is considered necessary. We recognise that those victims who are <u>not</u> assisting the police with criminal proceedings, but who need to remain in</p>

	<p>other circumstances. We would like to see commitments from the DoJ and DHSSPS to helping victims know how to access the support to which they are entitled following the RRP as well as during the NRM process.</p>	<p>Northern Ireland for personal reasons, would be eligible for discretionary leave to remain. However, we do not believe that this needs to be referenced in the Strategy.</p> <p>The service providers contracted by DOJ to support potential victims of human trafficking assist potential victims in accessing support and the Department is under a statutory obligation under section 18 of the 2015 Act to provide access to appropriate information.</p>
	<p>We would be interested to know which measures will be introduced to avoid secondary victimisation during the criminal justice process (point 3) if these are different or additional to the usual “special measures” available during court processes.</p>	<p>Specific measures in respect of PSNI investigations are already set out under section 23 of the 2015 Act. Provision relating to special measures in court is set out under section 24 of the Act.</p>
	<p>It is our understanding that section 21 (1-4) and (6-12) of the Human Trafficking and Exploitation Act 2015 will be coming into force on 13November 2015. The Department of Health in the strategy outlines that it plans to introduce the</p>	<p>DHSSPS has commented:</p> <p>Section 21 of the Act places a duty on the Regional Health and Social Care Board (the Board) to make arrangements to enable a person (an Independent Guardian) to be appointed to assist, represent and</p>

	<p>relevant regulations with regard to independent guardians by 31 March 2016. We are concerned that independent guardians could come in to operation in Northern Ireland without the relevant regulations (training, required qualifications, supervision, support for guardian) being in force. We would like the Department of Health to clarify why the date outlined in the document is the 31 March and not a date prior to section 21 coming into effect.</p>	<p>support a child who is the victim of human trafficking or who is a separated child.</p> <p>Section 21(4) of the Act, as enacted, required the Board to make those arrangements with a registered charity. Officials identified an issue with the definition of “registered charity” in section 21(4)(a) of the Act, which enabled only those charities registered under section 16 of the Charities Act (NI) 2008 to apply to provide an independent guardian service. To fix the problem, section 21(4)(a) of the Act had to be amended. This was done by way of the Justice Act (Northern Ireland) 2015, which received Royal Assent on 24 July 2015. The amendment came into effect the day after Royal Assent. Work to draft the Independent Guardian Regulations continued whilst the amendment to the primary legislation was awaited. The Department of Health, Social Services and Public Safety intends to consult on the draft Regulations in September 2015 and, subject to the outcome of the consultation, is aiming to finalise and make the Regulations early in</p>
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		2016.
	It should also be part of this strategy to set out how the arrangements will be made to appoint independent guardians.	<p>The HSCB has responded:</p> <p>Under the Act, HSCB as the commissioner, is tasked with making arrangements for the provision of the Independent Guardian Service. This will be progressed in line with finalisation of the associated regulations and guidance for the Independent Guardian Service which are currently being progressed by DHSSPS. The Act itself makes clear the arrangements to be adhered to for the delivery of the Independent Guardian Service. Practice and operational aspects of the service will be made explicit within the service specification and incorporated into policy and procedures underpinning the service model. These will be made explicit to all relevant agencies by the organisation appointed to deliver the service.</p>
Northern HSCT	<p>YES</p> <p>Urgently require counselling services for young people who have been trafficked.</p> <p>The role of the Guardian needs to be clarified,</p>	<p>DHSSPS has commented:</p> <p>Noted</p> <p>There are no specialist therapeutic services for young people who have been trafficked. However,</p>

	<p>including arrangements post 18 years old. All documents including LAC documentation needs to be available in all languages.</p>	<p>young people who have been trafficked may present with mental health or psychological problems that require referral to Child and Adolescent Mental Health Services (CAMHS). CAMHS in Northern Ireland are provided through a stepped care model, based on the clinical needs of the individual. CAMHS are provided by four multidisciplinary community-based teams which specialise in the assessment and intervention for under 18s with mental health needs, and their families and carers.</p> <p>HSCB has added:</p> <p>Further clarification is required on the specific service gaps relating to counselling services for separated / trafficked children. HSCB has not been advised of particular service gaps. Additional counselling and therapeutic services have been commissioned by HSCB in 14/15 and 15/16 to address the therapeutic needs of all looked after children, including separated and trafficked children and children who have experienced child sexual</p>
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		<p>exploitation.</p> <p>Availability of materials in languages should be child specific as the number of separated children who are known to HSC Trusts and the variety of ethnic backgrounds would not warrant translation of LAC materials en masse into a variety of different languages.</p>
Armagh City, Banbridge and Craigavon Borough Council	<p>YES</p> <p>Risk of a fragmented response, therefore welcome a standardised approach to dealing with the complex issues and effects human trafficking and CSE can have on both individuals and wider society.</p>	<p>Noted.</p>
	<p>There is also a need for a clear, timely referral process which provides access to specialist mental health risk assessment in relation to the potential impact on victims and also the potential for therapeutic intervention.</p>	<p>We recognise that CSE is a related issue but feel that it is best dealt with separately. The Department's "Tackling Child Sexual Exploitation in Northern Ireland" action plan was published in March 2015.</p> <p>The DOJ contracted support providers assist potential victims of human trafficking in obtaining</p>

		healthcare services, including counselling.
	<p>Financial poverty, access to benefits and regulated employment opportunities may be issues of concern for local victims and those who choose to stay. Social exclusion and deprivation may further compound the trauma. A need to develop supportive systems and connectivity which leads to longer term empowerment, confidence-building and emancipation for former victims would be an important step forward.</p>	<p>The discretionary leave scheme is available for non EU citizens. EU citizens who are victims of trafficking can also apply where they are supporting criminal proceedings. If their application is successful, the victim can access public funds including housing benefit.</p> <p>Flourish NI, an NGO represented on the Department's Human Trafficking Engagement Group, also works to provide support to adult victims post NRM and to those who choose not to enter the NRM.</p> <p>Flourish works directly with victims to empower them to determine their own futures and assist in engaging fully within wider society.</p> <p>An action has been added to the strategy to reflect Flourish NI's role.</p>
Voice of Young People in Care	<p>YES</p> <p>We welcome the proposed actions set out in strategic priority 2, in particular the emphasis on providing protection and support to children.</p>	Noted.

	<p>The “<i>Pathway for Safeguarding and Promoting the Welfare of Separated/ Unaccompanied Children arriving in Northern Ireland</i>” regional operational guidance (2013) makes reference to independent advocacy. It states that the involvement of independent advocacy to separated children is necessary given the circumstances of many separated children entering Northern Ireland.</p> <p>We believe that all children and young people in care and care leavers should have a statutory right to independent advocacy. Unaccompanied and separated children may face greater risks of sexual exploitation and abuse as well as child labour. It is important that these vulnerable children and young people are given access to independent advocacy to ensure their rights are safeguarded and adhered to.</p>	<p>DHSSPS has commented:</p> <p>This will be met by compliance with Section 21 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 re appointment of an independent guardian for child victims or suspected child victims of trafficking and separated children.</p> <p>HSCB has added:</p> <p>The introduction of an independent guardian service will ensure an independent guardian is in place for each separated / trafficked child; the independent guardian will be the primary advocate for separated / trafficked children.</p> <p>The introduction of a statutory basis for the provision of an independent advocate for all looked after and care experienced children is a matter for DHSSPS. HSCB has a contract in place with VOYPIC to ensure that all looked after and care experienced young people have access to an independent advocate as a matter of good practice.</p>
NSPCC	You might consider adding an action point	We note the suggested action around the health and

	<p>relating to Female Genital Mutilation. We recently hosted a roundtable discussion with Zsanett Shashaty, Welsh Assembly Government lead for Female Genital Mutilation, Honour-based violence, Forced Marriages and she highlighted the increased interface of potential or existing victims of FGM, with those who have been trafficked. We have included suggested narrative below.</p> <p><i>“We will consider the health and protection needs of trafficked adults and children in relation to those who are victims or potential victims of Female Genital Mutilation.”</i></p>	<p>protection needs of trafficking victims who are also victims or potential victims of FGM, however, we do not think it is necessary to include this in the strategy as the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 requires the Department to provide support and assistance to potential victims of human trafficking, having regard in particular to any special needs or vulnerabilities of that person caused by gender or being the victim of serious violence or serious abuse.</p>
British Red Cross	<p>The Red Cross welcomes many of the objectives and actions under Strategic Priority 2. Nevertheless, we note a number of outcomes or actions under this Priority in particular that reference human trafficking victims but not slavery (as already set out in paragraph 9 above). The Red Cross considers that this should be reviewed and remedied to ensure</p>	<p>Arrangements in Northern Ireland comply with the EU Directive on preventing and combating trafficking in human beings and protecting its victims. The NRM in Northern Ireland currently only extends to victims of human trafficking. DOJNI is currently engaging with other relevant NI Departments on whether NRM provision should be extended to all victims of modern slavery. This includes</p>

	<p>effective support for victims of slavery. We additionally consider a number of matters should be included under Priority 2 as follows:</p> <p>On the action ‘ensure effective NRM arrangements are in place in Northern Ireland, including participation in the ongoing review of NRM’ add ‘and facilitate the meaningful engagement in the review’s piloting and implementation process of organisations / groups in Northern Ireland who are supporting victims.’</p>	<p>consideration of affordability.</p> <p>We wish to be informed by the early lessons from the initial piloting phase in England and Wales.</p>
	<p>Under the objective to ‘protect and support victims through the criminal justice system’, actions to ensure implementation of the EU Directive 2012/29/EU establishing Minimum Standards on the Rights, Support and Protection of Victims of Crime, which is applicable to all victims of crime and contains particular references to trafficking victims;</p>	<p>Arrangements in Northern Ireland relating to human trafficking comply with the EU Directive 2012/29/EU establishing Minimum Standards on the Rights, Support and Protection of Victims of Crime.</p>
	<p>Develop upon the action ‘to ensure delivery of services under DoJ contracts with Migrant Help and Women’s Aid to adult potential victims of</p>	<p>We are satisfied that adequate support is already in place during the initial reasonable grounds assessment, as required under section 18 of the</p>

	<p>trafficking during the NRM's recovery and reflection period' to include (i) actions that can contribute to ensuring adequate support for victims during the initial 'reasonable grounds' assessment (ii) actions that help ensure meaningful support for those no longer within the 'recovery and reflection period', which recognise their status as victims and (iii) actions that can contribute to supporting victims outside the National Referral Mechanism;</p>	<p>2015 Act.</p> <p>Flourish NI, an NGO represented on the Department's Human Trafficking Engagement Group, works to provide support to adult victims post NRM and to those who choose not to enter the NRM.</p> <p>Flourish works directly with victims to empower them to determine their own futures and assist in engaging fully within wider society.</p> <p>An action has been added to the strategy to reflect Flourish NI's role.</p>
	<p>Regarding the action on 'development of relevant protocols to ensure protection and support services', DHSSPS should be a key owner, as it is the main provider of health services and there might be circumstances in which it can provide social services once a person has left the National Referral Mechanism or, indeed, if they have not entered it;</p>	<p>This specifically relates to <u>DOJ's</u> responsibilities in providing support services to potential victims of human trafficking in the NRM.</p>
	<p>Under the objective to 'protect and deliver support services', an action that all statutory and</p>	<p>This is something we would wish to move towards in due course. Our priority has been to ensure</p>

	<p>non-statutory providers receive periodic training on the protocols and practices to be developed;</p>	<p>appropriate training is in place and rolled out first.</p>
	<p>Actions under ‘raising awareness of the rights and entitlement of victims’ should include (i) training for law enforcement and all service providers on the human rights of victims, (ii) an action to reflect the Group of Experts on Action Against Trafficking in Human Beings recommendation that prosecutors and judiciary receive training on the legislative and human rights framework on trafficking, and (iii) actions to ensure victims are aware of, and can access, mechanisms to provide feedback or make a complaint about the services they receive (whether criminal justice or support related);</p>	<p>(i) The strategy includes an action around briefing relevant members of the legal profession</p> <p>(ii) The strategy also includes an action for DOJ to engage with the Judicial Studies Board offering training on signs of human trafficking. Since the commencement of the Human Trafficking and Exploitation Act, PPS has produced and issued guidance to prosecutors as follows:</p> <ul style="list-style-type: none"> - Staff Instruction – Guidance on the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. - Staff Instruction - Suspects in a criminal case who might be victims of trafficking or slavery. This provides guidance to prosecutors who are considering cases in which a person suspected of committing a criminal offence may be a victim of human trafficking or slavery.

		<ul style="list-style-type: none"> - The overarching PPS Policy for Prosecuting Cases of human trafficking is presently under review. <p>The strategy also includes an action for PPS to continue to identify training needs and provide appropriate training to prosecutors as required. Under the DOJ's victim care contracts service providers are required to have robust and clear feedback and complaints procedures in place.</p>
	<p>An objective to ensure and enhance rights protection (as highlighted in paragraph 10 above) with an action aimed at achieving the Group of Experts on Action Against Trafficking in Human Beings recommendation to '[adopt] clear support service minimum standards for victims of trafficking and the provision of adequate funding to maintain them.'⁵</p>	<p>DOJ is committed to ongoing support provision and indeed, is under a <u>statutory</u> obligation to provide support to potential victims of human trafficking. The support contract sets out the appropriate standards. We are already compliant.</p>
	<p>The action on 'fulfilling obligations under the Children (NI) Order 1995' to include fulfilling relevant provisions of the UN Convention on the</p>	<p>DHSSPS has commented: The Children (NI) Order 1995 is the domestic legislation which requires child protection services to</p>

⁵ As above, note 8, para 278.

	Rights of the Child and concluding observations of the Committee on the Rights of the Child;	be provided. As this is a Northern Ireland Strategy is there also a need to quote the international legislation which essentially says the same thing i.e. Article 6 of the UNCRC constitutes an obligation in international law for governments to provide services aimed at safeguarding children from serious harm. We would have no objections to amending this action to “Ongoing support for child victims and suspected child victims of human trafficking to fulfil obligations under the relevant domestic and international legislation e.g. Children (Northern Ireland) Order 1995 and UNCRC.” The strategy has been revised.
	On legal advice, actions to ensure victims receive free appropriate and comprehensive legal advice without delay, including for the purposes of seeking immigration advice and compensation.	Since this is already covered in the contract for support provision (also set out under section 18 of the Human Trafficking and Exploitation Act), we do not think it needs a specific action in the strategy.
Belfast Trust	YES The Trust is of the opinion that all actions associated with the objectives set appear to be	Noted.

	<p>appropriate. The Trust recognises the practical support required by all victims of human trafficking and exploitation and views the DOJ actions in relation to contracts with Women's aid and Migrant Help as a critical element of support. The Trust recognises its role in relation to child potential victims and child victims and acknowledges this as an obligation under the Children's N.I. order 1995.</p> <p>At this time the Trust has not identified any additional actions and considers the actions set as helpful and consistent with the objectives set.</p>	
Western Trust	<p>YES</p> <p>Objective 3 refers to the Protection and support of victims through the criminal justice system and has an action "to ensure that appropriate information is provided to victims and witnesses as cases progress and ensure that needs assessments are carried out at appropriate stages to determine whether victims require any specific assistance to enable them to participate</p>	HSCB has responded:

	<p>in criminal proceedings or special measures to assist victims to give their best evidence. “ This suggests that on occasion as deemed necessary there may be a requirement for ABE interviewers which may involve HSC ABE interviewers or indeed a needs assessment may require specific professional input from HSC Trusts. There is a resource impact of this new requirement.</p> <p>There needs to be greater emphasis on strengthening links between adult and children's services, to ensure a holistic approach to support and protection where families and children are concerned.</p> <p>-Clarity on training schedules and targeted audiences would be beneficial particularly for health and social care staff.</p> <p>-The assessment of specific needs, assistance and special measures should take into consideration the need for advocacy and guardian arrangements where a child is</p>	<p>This point is noted and will be actioned through HSCB and the regional Practice Learning Network and is particularly applicable to families where parents are subject of trafficking.</p> <p>Noted previously and a matter which can be addressed through OCTF, the regional practice learning network and HSC Trusts themselves through their respective annual training programmes.</p> <p>Independent guardian arrangements are being progressed for separated / trafficked children in line</p>
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	<p>concerned, or where an adult has been identified as having a learning difficulty or disability. Health and Social Services should be involved in such circumstances with proportionate consideration given to their individual health, social, emotional needs. These needs should not be to the detriment of focus in engaging them in criminal proceedings.</p>	<p>with legislative requirements and timescales for the finalisation of associated regulations and guidance.</p>
IJM	<p>We are aware of the limitations of the current NRM system, and we look forward to seeing the outcome of the current review.</p>	<p>Noted.</p>
	<p>We are encouraged that there will be appropriate training for First Responders as the actual process of recovery and the first hours thereafter are crucial in beginning a victim's rehabilitation well.</p>	<p>Noted.</p>
	<p>We would question whether e-learning training for Immigration and Enforcement Staff would be as effective as a live and interactive training session.</p>	<p>Home Office Immigration Enforcement has responded that the e-learning is the initial education and awareness phase of a sequential training programme on this issue. A programme of interactive classroom based training sessions to</p>

		consolidate staff e-learning is also scheduled to be rolled out. The strategy has been amended to reflect this.
	We note that any leaflet on compensation should be made available in various languages.	Noted – this is already the case.
	We are encouraged by the mention of special measures in court proceedings as these will very likely be beneficial.	Noted.
	Obviously, care for victims must extend beyond the 45 day reflection period. What provisions have been made for this?	<p>Section 18 of the Human Trafficking and Exploitation Act 2015 requires the Department to provide support until the end of a 45 day Recovery and Reflection Period or, if longer, until a conclusive determination as to whether the individual is a victim of trafficking has been made.</p> <p>Beyond this period, access to the wider welfare system is dependent on the right to remain.</p> <p>Discretionary Leave is available where an individual is supporting criminal proceedings.</p> <p>In addition, Flourish NI, an NGO represented on the Department’s Human Trafficking Engagement Group, works to provide support to adult victims post</p>

		<p>NRM and to those who choose not to enter the NRM.</p> <p>Flourish works directly with victims to empower them to determine their own futures and assist in engaging fully within wider society.</p> <p>An action has been added to the strategy to reflect Flourish NI's role.</p>
Paula McVeigh	<p>YES</p> <p>Perhaps also an Adult Trafficking Advice Centre could be set up to assist adult victims or some form of telephone or online assistance for people who wish to break free from traffickers/slavery etc such as the Modern Slavery Helpline. Further promotion and advertisement of this would be necessary.</p>	<p>Affordability needs to be taken into account. Setting up additional helplines could create confusion for victims when the Modern Slavery Helpline is already available.</p> <p>The Modern Slavery Helpline extends to Northern Ireland and the strategy includes an action to continue to promote calls to this helpline.</p> <p>Advice for victims is also available through the DOJ support contract.</p>
	<p>There should be a Criminal Injuries Scheme in place for such victims if the perpetrators cannot pay compensation.</p>	<p>Victims of human trafficking are already eligible to apply for compensation under the Criminal Injuries Compensation Scheme.</p>
HSCB	Clarification is required on which agencies will	We are awaiting the outcome and lessons learned

	<p>act as First Responders before we can be confident that the training is both appropriate and effective.</p> <p>Further research is required to understand the adult victim's journey/needs and how these should be met once they have left the NRMs Recovery and Reflection period. This is likely to involve a range of statutory and non-statutory organisations to develop a clear pathway for victims.</p> <p>Consideration should also be given to the transition arrangements for children who reach the age of 18 years and who are no longer subject to the protection of the Children Order, but who may not be eligible/meet the threshold for adult social care services.</p> <p>The contribution of the Child Trafficking Advice Centre (CTAC) has been invaluable for practitioners and we welcome the strategy's commitment to the continuation and development of this service</p>	<p>from the NRM piloting phase, although we anticipate that these will include PSNI and the Health and Social Care Trusts as well as a number of reserved bodies such as GLA, Border Force, NCA and UKVI.</p> <p>DOJ has met with Health Colleagues to discuss and put in place clear pathways and protocols to enable the transition of a child victim into adult services. Further work is required in this area.</p>
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<p>NICEM</p>	<p>The draft Strategy currently lacks actions aimed at maintaining links between NGOs and relevant organisations - including those within the NRM- with the purpose of supporting victim identification.</p> <p>European research has stated that NGOs can 'support identification of trafficked persons', as they can 'win the confidence of their clients' and thus secure their testimony – but it is also emphasised that they 'need cooperation with all actors in the anti-trafficking field' Thus, actions on this area are vital to ensuring improved victim identification through the maintenance of links between key actors.</p> <p>Furthermore, as noted above, the ongoing review of the NRM will likely result in a change in the role of NGOs, as the First Responder system becomes more closely attached to those exercising public authority. In the context of these potential changes, it is more important than ever that actions be taken to ensure that</p>	<p>We do not agree with this assessment. We strongly value and recognise the role of NGOs and our ongoing commitment to this is made explicit in Strategic Priority 4: Partnership. We will continue to engage with other appropriate bodies as necessary.</p>
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	<p>NGOs are able to interact with these bodies to support victim identification.</p> <p>While the draft Strategy currently emphasises that interaction with civil society will be fostered through meetings of the Human Trafficking Engagement Group, this group lacks representation from some key actors in the field of trafficking, mostly notably employment monitoring bodies.</p> <p>Whilst the Gangmasters Licensing Authority currently attends the OCTF's Immigration and Human Trafficking Subgroup, the lack of representation from employment monitoring bodies on the Engagement Group leaves a degree of separation between these bodies and NGOs. This represents a missed opportunity for information-sharing between these bodies, which could result in the identification of key themes/sectors of interest and in turn improve the ability of all bodies to identify victims.</p> <p>Furthermore, there are currently no actions</p>	<p>The OCTF Subgroup provides a forum for appropriate coordination between relevant organisations. Membership will be reviewed in October 2015. The strategy remains focused on the more serious end of the spectrum of exploitation, though we recognise the need for appropriate engagement with a wide range of bodies overseeing labour practices.</p>
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	<p>envisaged under the ‘protect and support’ priority that would ameliorate the lack of guidance provided by the Government to NGOs that may encounter victims of trafficking, which has been discussed further above. This is in contrast to other States, such as Australia, which provide central guidance for NGOs that could encounter victims.</p> <p>Again, the lack of guidance and/or training provided to NGOs may inhibit their ability to recognise and refer potential victims of trafficking that they encounter. Addressing this deficiency could contribute to the improvement of victim identification and support.</p> <p>NICEM recommends that an action be included under the ‘protect and support’ strand of the Strategy to provide for representation of all employment monitoring bodies at the Department of Justice’s Human Trafficking Engagement Group.</p>	<p>Extensive training has already been provided to NGOs represented on the Human Trafficking</p> <p>We already engage with employment bodies and can keep this under review. In addition a review of the membership of the OCTF Immigration and Human Trafficking Subgroup is scheduled for October 2015. We do not agree that the Engagement Group is the relevant forum for such engagement.</p>
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	<p>NICEM also reemphasises its recommendation that the Department of Justice deliver training and/or guidance to all NGOs that may encounter victims of trafficking, focusing on:</p> <ul style="list-style-type: none"> • What constitutes human trafficking; • Indicators that may suggest that an individual is a victim of trafficking; • Procedures to follow under the revised NRM if you suspect that an individual has been trafficked. 	<p>Training has been provided to Engagement Group Training has already been provided to Engagement Group members, as well as wider NGOs working on this issue, under previous action plans. Mindful of the limits on our capacity, we believe there is a need to prioritise other actions before refreshing this training.</p>
<p>Law Centre NI</p>	<p>Objective No. 1. We suggest that <i>“improve victim identification and support”</i> should include an action on providing <i>“training for appropriate front line staff”</i>.</p> <p>Specifically, we recommend that there is mention to training of Tascorp staff in Larne House Short Term Holding Centre and prison service staff. As we outlined above, we think Department of</p>	<p>Training for frontline staff is already covered elsewhere in the strategy, for example, under Strategic Priorities Pursue and Protect and support.</p> <p>Training to Larne House staff has been provided by NGOs represented on the Human Trafficking Engagement Group. DOJ has also engaged with staff in the prison service. As this work has already</p>

	<p>Justice should be clear about its responsibility for trafficking matters, even when they occur in institutions – such as Larne House Short-Term Holding Facility – where Department of Justice has not traditionally played any role.</p>	<p>been taken forward, we do not think that this needs to be referenced in the strategy, although we will keep training needs and opportunities under review.</p>
	<p>Also in relation to Objective No. 1, we suggest that the ‘Projected Outcomes’ are amended to be clear that victims of exploitation should not face prosecution.</p>	<p>We do not think it is necessary to include this as a projected outcome.</p> <p>PPS has issued a Staff Instruction which provides guidance to prosecutors who are considering cases in which a person suspected of committing a criminal offence may be a victim of human trafficking or slavery. It includes the defence provided for in the 2015 Act as well as the common law defence of duress and the importance of the Public Interest in such cases and explains the process to be followed by prosecutors in such cases.</p>
	<p>We recommend that Objective No. 2 clearly links to the DHSSPS adult safeguarding policy “Adult</p>	<p>We recognise the overlap that exists with Adult Safeguarding. The Policy has been developed with</p>

	<p>Safeguarding: Prevention and Protection in Partnership,”⁶ which is clear that an adult victim of trafficking is a person at risk of harm. One possibility is to include the following action in this section: “<i>ensuring the delivery of services in accordance with the DHSSPS adult safeguarding policy for Northern Ireland ‘Adult Safeguarding: Prevention and Protection in Partnership’</i>”.</p>	<p>reference to human trafficking. We will ensure that any work taken forward is in line with adult safeguarding policy, however, we do not think that a specific action is required to reflect this.</p>
	<p>In relation to Objective No. 3, the Action needs to be amended to be clear that victims of trafficking can avail of the discretionary leave scheme if their personal circumstances warrant it. This is very important: at the moment, the Strategy only seeks to support victims who are assisting with criminal investigations. The European Trafficking Convention (Article 14)⁷ enshrines the principle that victims of trafficking can be granted a Residence Permit if the competent authority</p>	<p>The strategy has been revised to reflect this.</p>

⁶ This triggers an Adult Protection Response from the HSC Trust and the PSNI with the appointment of a Designated Adult Protection Officer responsible for ensuring that “*connections are made with interagency mechanisms*” which in the case of victims of trafficking will include the statutory agencies involved in the NRM process. See: <http://www.dhsspsni.gov.uk/adult-safeguarding-policy.pdf>

⁷ Council of Europe Convention on Action against Trafficking in Human Beings 2005. Accessible here: <http://www.conventions.coe.int/Treaty/Commun/QueVoulezVous.asp?NT=197&CM=1&CL=ENG>

	considers that their stay is necessary either for the purpose of a <i>criminal investigation</i> or owing to the <i>personal circumstances</i> of the victim. This needs to be clearly set out in in the Strategy.	
	In relation to Objective No.5: “ <i>Provide protection and support services to children</i> ”, we suggest that an additional Projected Outcome is included: “ <i>compliance with requirements under the EU Directive and the Human Trafficking & Exploitation (Criminal Justice & Support for Victims) Act (NI) 2015</i> ”.	Agree – the strategy has been amended.
	In relation to Objective No. 6, the Projected Outcome should clarify that victims <i>can avail of legal advice</i> as well as legal representation. The Strategy also commits to making Legal aid available to trafficking or slavery victims; it would be useful to clarify which areas of law this applies to.	This is already set out in statute under section 18 of the 2015 Act, we do not believe it needs to be set out explicitly in the strategy.
	In relation to Objective No. 8: “ <i>Reinforce capacity to respond to major human trafficking or slavery like incidents</i> ”, we welcome the Projected	This action focuses on the immediate response to a large scale incident.

	<p>Outcome: “<i>gaps identified during previous major incidents are addressed</i>”. We recommend that the PPS is added as an agency with ownership of this outcome to ensure that lessons learned from successful and unsuccessful prosecutions are captured and feed into the discussion so as to prevent and reduce the risk of human trafficking and exploitation in NI.</p>	
Belfast PCSP	<p>Review of labour law enforcement.</p>	<p>This goes much wider than the strategy which focuses on the most serious abuses of trafficking and slavery, servitude and forced or compulsory labour. We believe such a review would sit outside the scope of this strategy and the role of the DOJ.</p>
	<p>Action 3 stipulates that ‘victims of human trafficking who are assisting with criminal investigations can avail of the discretionary leave scheme where appropriate / necessary.’ This should be extended to all victims, including those who, for whatever reason, do not actively cooperate with enforcement agencies. Discretionary leave should not solely be</p>	<p>Under the EU Trafficking Directive, victims who are <u>not</u> assisting the police with criminal proceedings, but may warrant discretionary leave to remain, if there are compelling personal circumstances. However, this is a reserved matter and therefore outside the remit of the DOJ.</p>

	restricted to those victims who are cooperating with enforcement agencies.	
	The non-criminalisation of suspected victims of human trafficking is an area where clarity is needed. This would assist in providing the clarity and confidence required to effectively deal with those circumstances where offending has occurred as a result of a person's exploitation. There is a need for guidance for prosecutors in dealing with the victims of trafficking and exploitation who are forced to commit crime as a direct result of their victim status.	Section 22 of the 2015 makes provision for a statutory defence for victims of modern slavery offences who have been compelled to commit certain offences which are set out in the Act. PPS has issued a Staff Instruction which provides guidance to prosecutors who are considering cases in which a person suspected of committing a criminal offence may be a victim of human trafficking or slavery. It includes the defence provided for in the 2015 Act as well as the common law defence of duress and the importance of the Public Interest in such cases and explains the process to be followed by prosecutors in such cases.
	The police and the criminal justice system need to ensure that trafficked children / adults found to be involved in criminal activity are dealt with from a victim centered / child safeguarding perspective and not unnecessarily criminalised.	As above. This is already the case.
	Trafficking must not be considered an illegal	Agreed. This is already the case.

	immigration issue but rather an organised crime issue.	
	There needs to be procedures in place to track a victim through the system and monitor the quality of the care provided.	Noted. The strategy contains an action for DOJ to evaluate the support service contract.
	The quality of decision making under the NRM needs to be constantly monitored by running case review exercises and auditing decisions.	Following the review of the National Referral Mechanism (NRM), multi-agency panels are currently being piloted in England and Wales as an alternative to Competent Authorities. We await the outcome and lessons learned from those pilots.
SINI	YES SINI recognises all of the work that is ongoing on this important issues, however we are concerned that many organisations are “doing their own thing”. A standardised approach is very welcome.	Strategic Priority 4: Partnership – aims to standardise the approach and pool resources. One of the functions of the Engagement Group is to provide a coordinated response and agreed messaging.
	There are many issues affecting a victim – finance, housing, education, work availability, skills training, - there needs to be a clear pathway that enables them to become strong members of our community. There needs to be	Support is available under the DOJ’s victim care contracts with Migrant Help and Women’s Aid. In addition, Flourish NI, an NGO represented on the Department’s Human Trafficking Engagement Group, works directly to provide support to adult

	<p>clear and defined support mechanisms in place.</p>	<p>victims post NRM and to those who choose not to enter the NRM.</p> <p>Flourish works directly with victims to empower them to determine their own futures and assist in engaging fully within wider society.</p> <p>An action has been added to the strategy to reflect Flourish NI's role.</p>
<p>BMEWN</p>	<p>The Network notes with approval that the draft Strategy contains an action stating that it will ensure that victims are able to avail of discretionary leave to remain where appropriate, but is disappointed to see that it is necessary for the victim to be 'assisting with criminal investigations'.</p> <p>Victims of trafficking have undergone a serious and traumatising ordeal, making it difficult for them to cooperate with authorities, especially when they themselves continue to face prosecution for offences they have committed whilst being trafficked. Thus, cooperating with the criminal investigation into their traffickers</p>	<p>Under the EU Trafficking Directive, victims who are <u>not</u> assisting the police with criminal proceedings, but may warrant discretionary leave to remain, if there are compelling personal circumstances. This this is a reserved matter and therefore outside the remit of the DOJ.</p> <p>Noted. The Specific measures in respect of PSNI investigations are set out under section 23 of the 2015 Act. Special measures in court are set out under section 24 of the Act.</p>

	<p>may be extremely difficult for some victims.</p> <p>In addition to this, many victims of trafficking face being re-trafficked upon return to their country of origin. Consequently, arbitrarily denying leave to remain due to a failure to cooperate with an investigation may directly contribute to experiences that constitute a violation of victims' rights under various instruments.</p> <p>Further regarding protection and support for victims, it is important to ensure that sensitivity is shown towards potential victims' preference as regards the gender of their interviewer at all stages of interaction with the criminal justice system and the NRM.</p> <p>It is noted that current guidance for competent authorities in the UK states that officials should respect the potential victim's preference for the gender of their interviewer insofar as this is operationally possible. It should be ensured that this same respect is accorded by policing authorities, interpretation services and</p>	<p>Under the EU Trafficking Directive, victims who are <u>not</u> assisting the police with criminal proceedings, but may warrant discretionary leave to remain, if there are compelling personal circumstances. This this is a reserved matter and therefore outside the remit of the DOJ.</p>
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	<p>prosecutors where possible.</p> <p>The BMEWN recommends that the action on discretionary leave to remain read ‘Ensure that victims of human trafficking can avail of the discretionary leave scheme where appropriate/ necessary’.</p> <p>It is also recommended that an action be included to ensure that potential victims’ wishes to be interviewed by a person of a particular gender are respected at all stages of interaction with the criminal justice system and the NRM where appropriate.</p>	<p>Not necessary to include action in strategy.</p>
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Strategic priority 3: Prevent

6(a). In your opinion are these proposed objectives appropriate? Are there any additional objectives that in your opinion should also be included?

Organisation/individual	Comments	DOJ response
<p>Craigavon Trades Council</p>	<p>These objectives are appropriate though Craigavon Trades Council would like to see the addition of looking into social issues that are</p>	<p>Noted.</p>

	contributing to exploitation.	
Women's Forum NI	<p>YES. Expand engagement with other groups because of their knowledge of rural areas and seasonal agricultural labour, to include:</p> <ul style="list-style-type: none"> • Women's Institute (WI); • Ulster Farmers Union (UFU); • Rural Women's Network; and • GAA. 	Agreed. An action has been added to the strategy to address engagement with these organisations.
CARE NI	<p>YES</p> <p>We agree that these objectives are appropriate.</p>	Noted.
Northern HSCT	<p>YES</p> <p>Enhance inter-country collaboration with UK BF, the Home Office and other European Border Agencies to stop the trafficking journey earlier and reduce trauma.</p>	Agreed. Close partnership and alignment is already in place and will be enhanced through the UK-wide Modern Slavery Strategy.
Armagh City, Banbridge and Craigavon Borough Council	<p>YES</p> <p>Require robust gathering of statistical evidence, collated on a multi-agency basis, to help give a more accurate picture of the extent of the problem.</p>	Noted and agreed.
	Avoid lack of inconsistency, need a consistent	DOJ and its partners work together to send out a

	approach to training and awareness raising.	consistent message through awareness and training activities.
	Develop child safeguarding networks - with a focus on at –risk groups and close collaboration with the Safeguarding Board– identify a Safe Place scheme for reporting.	Noted
	Need buy in from all sectors – requires a multi-agency response.	Agreed.
Voice of Young People in Care	YES VOYPIC welcomes strategic priority 3: prevent and believes the proposed objectives are appropriate.	Noted.
NISMP	Objective 1: The projected outcomes for this objective should include: ‘Fewer people from at-risk groups being drawn in to human trafficking or exploitation’. This will not only clearly link the outcome to the objective - which has a focus on at-risk groups - but will also ensure that indicators are in place which track how successful initiatives have been at reducing the risk for these groups. Focusing on at-risk groups	Whilst we agree with the proposed focus on at-risk groups (and that is the approach we have adopted), the work that we are doing to raise awareness is likely to lead to an increase in reporting and therefore could lead to an <u>increase</u> in victim identification.

	<p>will also ensure that the public is properly informed that human trafficking is a crime that can affect and be perpetrated by UK and Irish nationals as well as minority communities.</p>	
	<p>Objective 1: There is currently no clear link between actions 2 and 3 with Objective 1's purpose of engaging with identified at-risk groups. We would suggest that rewording Action 2 ('Engage with community groups representing minority ethnic groups') to include a focus on at-risk groups would create this link. We would also suggest that Action 3 ('Engage in workshops within secondary education, university/college students, youth clubs etc') is more appropriate as an action related to Objective 2 which focuses on raising public awareness.</p>	<p>We agree with the suggested rewording of Action 2 and the strategy has been amended to reflect this.</p> <p>In relation to Action 3, we also want to reduce the risk for young people.</p>
	<p>Objective 3: As stated in our response to Q4a and 4b above, we believe that the Judicial Studies Board should be an integral partner in the implementation of this strategy. Therefore the action 'Write to JSB offering training' is too weak</p>	<p>We recognise the independence of the judiciary however we are committed to engaging with the Judicial Studies Board in respect of training on modern slavery.</p>

	to ensure any contribution towards the projected outcomes.	
	<p>Additional Objective: We believe that an additional objective which promotes closer cooperation with and between agencies which oversee and enforce employment regulations is necessary if the aim of the strategic priority is to be achieved. The intention of this objective would be similar to that of Objective 3 of Strategic Priority 1. Close cooperation between agencies responsible for the oversight and enforcement of employment regulations would help build a picture of employment conditions and patterns of exploitation within sectors where forced labour has been identified as being especially prevalent, thus helping to target actions aimed at driving out exploitation within these sectors. Coordinating actions with work already being done in this regard by DEL would ensure that additional resources required are negligible.</p>	<p>This is outside the scope of the strategy. The OCTF Subgroup provides a forum for appropriate coordination between relevant organisations. HMRC has recently been invited to join and membership will be reviewed in October 2015. The strategy remains focused on the more serious end of the spectrum of exploitation, though we recognise the need for appropriate engagement with a wide range of bodies overseeing labour practices.</p>
Belfast Trust	YES	

	<p>The Trust is of the view that the objectives detailed in the Draft Strategy relating to the Prevent priority are appropriate. The Trust acknowledge that awareness of human trafficking ,slavery and forced labour in N.I. is limited and that significant work is required to raise public awareness regarding the signs and indicators .Targeted engagement with key organisations to raise the profile is required alongside continued engagement with groups identified as being high risk.</p> <p>At this time the Trust has not identified any additional objectives and recognises these as ongoing long term objectives.</p>	
Western Trust	<p>YES</p> <p>The Western Trust agrees with the strategic objectives under prevention and reduction of the risk of human trafficking and exploitation in Northern Ireland.</p> <p>The Western Domestic Violence Partnership</p>	Noted.

	<p>agrees with the strategic objective in prevention. The WDVP is a forum which extends to community and voluntary sector organisations to promote prevention and earlier intervention as we do for domestic and sexual abuse crimes.</p> <p>Raising the profile of the issue at a community and societal level is likely to lead to earlier detection and prevention. Accessibility of information and services will enable support to be targeted more effectively to those in need, and equip them with knowledge in respect of their rights and entitlements.</p>	
IJM	<p>We believe these objectives are appropriate and make the following comments:</p> <p>As some recruitment occurs in other jurisdictions, it is important that collaboration occurs to begin to address this, or to offer our assistance with same. We recognise there are complexities due to the cross-border nature of the recruitment, but ultimately preventing someone from being</p>	<p>We recognise the value of this suggestion, however, we believe that the UK Government is best placed to take this forward, especially regarding international relations. We are however aligned to the UK's overarching Modern Slavery Strategy which includes objectives to this end.</p> <p>We need focus our efforts and priorities where we can make the biggest difference.</p>

	recruited in the first place is preferable to recovery afterwards.	
Paula McVeigh	<p>YES</p> <p>In addition to the Actions already specified under 'Strategic Priority 3: Prevent, objective 2' for raising awareness, perhaps the use of social media and further media adverts could also be incorporated in order to fully raise awareness and comply with the requirements of section 12 of the Act.</p>	<p>Partners on the Human Trafficking Engagement Group already utilise social media to raise awareness of human trafficking.</p> <p>Northern Ireland participated in last year's UK wide modern slavery media campaign. We are also constrained by capacity and affordability and have therefore prioritised actions. We hope to build on these in the future.</p>
	<p>Given the current migrant crisis in Europe, action should be taken to highlight the increased risk of trafficking as a result with further ad campaigns and raising public awareness via social media and advertisement to be more vigilant in the circumstances.</p>	<p>This is a UK Government lead.</p>
	<p>Wider publication of how to spot potential victims of trafficking would also be required through information/training days etc.</p>	<p>We have already delivered a wide programme of awareness and we are committed to building on this as set out the strategy. Advice on how to spot the signs of human trafficking is already an integral part of the Department and its partners awareness</p>

		raising activities. We are committed to expanding this, as set out already in the strategy.
	More widespread advertisement of the Modern Slavery Helpline.	The strategy includes an action to continue to promote calls to the Modern Slavery Helpline.
	Workshops and engaging with minority groups and school groups etc should be ongoing and at regular intervals to ensure awareness continues over time.	Agreed – this is already the case and reflected in the strategy.
HSCB	YES In our view these objectives are appropriate. However, we do not underestimate the challenges involved in raising awareness of human trafficking, slavery and forced labour on a population-wide basis and the resources required to engage with the private sector.	Noted.
NICEM	NICEM does not suggest any additional objectives under this priority, but does recommend some further actions under these objectives, as discussed below.	Noted
Belfast PCSP	YES This objective should also focus on exploring	The strategy is aligned with the UK-wide Modern Slavery Strategy. One of the commitments in the

	<p>greater co-operation with international partners in transit and source countries. It should focus on working with national partners to target traffickers before they reach NI thus preventing more people from becoming victims in the first place.</p>	<p>Modern Slavery Strategy is to increase cooperation with international partners to better investigate and prosecute cases of modern slavery in source, transit or destination countries.</p> <p>We will seek opportunities to utilise mechanisms for co-operation but also recognise the UK Government's primacy on international relations.</p>
	<p>Awareness of trafficking must be raised amongst people who may be vulnerable to it; this should not only be intended for vulnerable people in developing countries, but also needs to be targeted to adults and children within the UK who are vulnerable to exploitation and internal trafficking.</p>	<p>Agreed.</p>
	<p>The presence of the land border and the challenges this presents to preventing human trafficking needs to be explored further.</p>	<p>Agreed. Actions around cross border engagement are already included in the strategy.</p>
SINI	<p>YES</p> <p>SINI feels that there is a requirement for data collection, through all of the agencies and NGOs so that there is a clear picture of the issue.</p>	<p>Agreed. We are currently working on legislation to implement the duty to notify about suspected victims of human trafficking or slavery offences. This is intended to enhance our understanding of the scale of human trafficking and slavery-type practice in Northern Ireland. This is reflected in the strategy</p>

		already
BMEWN	The BMEWN considers these objectives to be broadly reasonable, although it would recommend further actions to implement them, as detailed below.	Noted.

Strategic priority 3: Prevent

6(b). In your opinion are these proposed actions appropriate? Are there any additional actions that in your opinion should also be included?

Organisation/individual	Comments	DOJ response
Craigavon Trades Council	Craigavon Trades Council is concerned about the omission in this document of the work already undertaken by Freedom Acts on many of these action points.	Progress reports against the previous two year's human trafficking action plans highlight the work taken forward by members of the Engagement Group. As this document is setting the strategic direction for moving forward, we have not included a detailed summary of the work already carried out.
	Craigavon Trades Council are also concerned of the lack of engagement with recognised Trade Unions.	ICTU is represented on the Human Trafficking Engagement Group. We recognise the role of Trade Unions and plan to engage with them further. This is now reflected in the strategy.

	We also have concerns that welfare reform will negatively impact on many of the community groups mentioned in this section and would ask for this to be monitored closely.	Noted. Welfare reform is outside the scope of this strategy.
	We would also suggest a multilingual advertising campaign on the cross border buses featuring helpline numbers etc.	Noted, however, funding is unlikely to be available for a cross-border advertising campaign. The REACH Project, which consists of two cross border advertising campaigns, aimed at raising awareness of and reducing demand for human trafficking for sexual exploitation, is still ongoing.
	Craigavon Trades Council also feels any campaign to raise awareness must be fact based and not Tabloid sensationalism. They must also be devoid of religious dogma or interference.	Noted and we agree.
Women's Forum NI	<p>YES</p> <p><i>Additional Actions:</i></p> <p>There should be a strategy risk assessment in place to deal with immigrants currently en route via the Mediterranean who may have come in through Ireland or British mainland and be further exploited by traffickers or gang masters.</p>	Immigration is a reserved matter and is therefore outside the scope of the strategy.

Freedom Acts	<p><i>Additional Actions:</i></p> <p><u>Objective 1:</u> <u>Action</u> – Sessions/workshops/lessons and activity with young people and students in Post-Primary education, community youth provisions on human trafficking and exploitation. Continued use of DOJ education resource and Freedom Acts Youth Resources. <u>Target date</u> – Ongoing 2015/16. <u>Owner</u> – Freedom Acts.</p> <p><u>Objective 1:</u> <u>Action</u> – Workshops in partnership with relevant agencies (North and South) to promote migrant worker rights, forced labour awareness. <u>Target date</u> – September/October 2015. <u>Owner</u> – Freedom Acts.</p> <p><u>Objective 3:</u> <u>Action</u> – Continued training with key adult safeguarding staff in HSCT.</p>	<p>Agree. These actions have been added to the Strategy.</p>
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	<p><u>Target date</u> –Ongoing 2015. <u>Owner</u> – Freedom Acts.</p> <p><u>Objective 5:</u> <u>Action</u> – Development and piloting of a resource for young men for use in Post-primary school and youth settings, exploring sexualisation, pornography, violence, masculinity, exploitation and consent.</p> <p><u>Target date</u> –Ongoing 2015. <u>Owner</u> – Freedom Acts.</p>	
CARE NI	<p>YES</p> <p>We agree that these proposed actions are appropriate. We would make the following comments with regard to the proposed actions.</p> <ol style="list-style-type: none"> 1. Under part 5, we would like to see more specific projected outcomes in relation to reduction of the demand for paid sex and the reduction of demand for the use of trafficked individuals in the labour force in Northern Ireland. In terms of actions 	<p>Specific actions around raising awareness are included in the strategy.</p> <p>We need to bear in mind the financial constraints and affordability as well as the Executive’s policy on Government advertising. In light of resources and capacity we have prioritised our actions, although we hope to build on these in the future.</p> <p>REACH Project is ongoing until November 2015 and materials will have a lifespan beyond the actual campaign.</p>

	<p>under these points, we welcome those mentioned but believe there is a need for continued programmes to raise awareness in relation to the demand for paid sex, perhaps a follow up campaign to the “men and boys strand of the REACH Project” that is included in the strategy. We would also recommend specific actions in relation to raising awareness with the general public of labour exploitation in consumer products produced in Northern Ireland as well as the international projects that are listed.</p> <p>CARE NI clarified that they were thinking specifically around public awareness campaigns about labour exploitation. For example, poster campaigns, radio advertisements, advertisements in local papers etc. CARE NI appreciate that this would be difficult in financially tight times, but have seen examples of some of this taking place (Invisible Traffik campaign for</p>	<p>The strategy contains an action for the Department to contribute to Home Office’s Trafficking in Supply chains (TISC) consultation.</p>
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	<p>example). Actions have been added to the strategy around DOJ engaging with Stronger Together to discuss how its resources can be used.</p> <p>CARE NI would also encourage continuing the work that has already been going on with regard to the DoJ and the PSNI developing relationships with at-risk industries in Northern Ireland (food production etc).</p> <p>We would also point to what the Home Office is doing with regard the supply chains reporting requirements and businesses in Northern Ireland.</p>	
Northern HSCT	<p>YES</p> <p>We urgently require recruitment of translators in all languages and dialects who are available for a quicker and more responsive service to suspected victims of trafficking.</p>	<p>HSCB has responded:</p> <p>Interpreter Service is a contracted service. Where matters arise relating to the quality or scope of provision of a contracted service the lead body should take them through the appropriate channels. The matter will be further discussed within the Regional Practice Network for separated / trafficked</p>

		children.
	Financial resource to other statutory agencies for this work including translation of documents such as LAC documentation, Pathway Plans and where appropriate, costs for reunification.	HSCB has responded: Translation of documents and viability of same has already been addressed. Matters relating to reunification costs can be scoped and quantified through the regional practice network. To date numbers of separated children subject to reunification have been slight; costs of reunification compared with continuation of HSC Trust discharge of statutory responsibilities needs to be a considered matter for HSC Trusts.
	Better collaborative working in respect of each victim's journey to include for example: what happened at the port – people, telephone numbers, documents etc, to facilitate the investigation.	Agreed. This is standard information gathered by the PSNI in a human trafficking case.
Armagh City, Banbridge and Craigavon Borough Council	YES Welcome the move towards pro-active targeted approach to raising awareness of the issue.	Noted.
	Build resilience to develop supportive communities and continue to develop structures	Agreed. A programme of public awareness is in place and will be continued through this strategy.

	which support “neighbourliness” such as Neighbourhood Watch wherein communities are the “eyes and ears” of the local area and on the look- out for situations that raise concern.	
	Organisations who regulate and enforce employment conditions are central to the process in order to help identify and create a better understanding of what constitutes exploitative practices and working on a co-operative basis with other agencies to put a stop to exploitation.	Noted.
	Resourcing – build on existing resources and work within government departments such as Department Employment and Learning.	Noted and agreed.
Voice of Young People in Care	YES We welcome the inclusion of the objective to continue engagement with at-risk groups and raising public awareness of the signs and indicators of human trafficking, slavery and forced labour.	Noted.
	Although all children and young people are vulnerable to being trafficked and sexually	HSCB has responded that the comment appears to apply to indigenous children subject to trafficking /

	<p>exploited, research has highlighted that children in care, especially those in residential care, are at greater risk of sexual exploitation. In particular, children and young people who run away from residential placements or children's homes are at greatest risk of being exploited.</p>	<p>CSE and therefore is being addressed through CSE and ongoing implementation of Marshall recommendations.</p>
	<p>VOYPIC believes that it is important to ensure that there is continued engagement with children and young people in care, in particular those in residential care, to reduce the risk of being drawn to human trafficking and exploitation.</p>	<p>As above</p>
	<p>We also support the objective to raise public awareness of trafficking and slavery –like offences including the cause and impact, indicators and in particular how to respond and report. We believe that everyone is a social guardian and has a role to play in preventing trafficking and exploitation. The more public awareness there is of human trafficking, slavery and forced labour, the more we can prevent it from happening.</p>	<p>Noted.</p>

<p>Stronger Together</p>	<p>Stronger Together supports businesses to target hidden labour exploitation by providing easily accessible resources via www.stronger2gether.org including:</p> <ul style="list-style-type: none"> • A best practice toolkit containing alert flags and good practice to deter and identify hidden exploitation, with guidance to protect and support potential victims. • A wide range of resources, including multi-language workplace posters and leaflets, template forms and procedures, surveys and questionnaires. • “Daniel and Weronika’s Story”, a powerful anti-trafficking video based on actual cases for use in induction and training, available with subtitles in multiple languages. <p>The materials are free, open source and may be downloaded by anyone in any country. The</p>	<p>Agreed. The strategy has been revised.</p>
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guidance is applicable to any sector where vulnerable, predominantly migrant workers may be at risk.

The resources are supported by innovative, interactive workshops run across the UK to help businesses understand their responsibilities and the best practice in tackling modern slavery.

In less than two years of operation, this pioneering initiative achieved significant traction in engaging business in reducing slavery in their supply chains:

- Almost 2000 industry representatives registered with stronger2gether.org.uk to access the resources available through the site for use within their organisations.
- The Home Office Modern Slavery Industry Factsheets (<https://www.gov.uk/government/publications/modern-slavery-industry-factsheets>) which signpost to Stronger Together

	<p>stating “For advice on how you can avoid employing victims of trafficking and how you can help ensure your supply chain is slave free visit stronger2gether.org”</p> <ul style="list-style-type: none">• Nearly 1000 individuals from over 500 growers, food producers and labour providers attended Tackling Modern Slavery workshops and committed to take the Stronger Together message to over 400,000 workers.• ‘Daniel and Weronika’s Story’ was made available on YouTube and viewed over 6000 times.• In October 2014 the Stronger Together Business Partner Webpage was created, allowing businesses to upload evidence publicly declaring the proactive measures they have implemented to tackle hidden slavery.• After a successful pilot in February 2015,	
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	<p>Stronger Together launched Worker Awareness Training, delivered by specialist trainers directly into employers, aimed specifically at agency workers and those coming from communities where there may be vulnerable workers.</p> <ul style="list-style-type: none"> • In September 2015 Stronger Together will launch online training for recruiters and supervisors on their role in preventing, spotting and handling modern slavery related to labour exploitation. <p>Submission</p> <p>Labour exploitation formed 71% of the potential victims referred to the NRM in 2014.</p> <p>Stronger Together is established and equipped to help every business and employer understand their responsibilities in the fight against modern slavery and provide them with the tools, resources and training needed to protect their</p>	
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	<p>businesses and supply chains.</p> <p>Following on from a previous successful event Stronger Together has a further “Tackling Modern Slavery in UK Businesses and Supply Chains” (see attached leaflet) workshop at Cido Innovation Centre, 73 Charlestown Road Industrial Estate, Portadown, Craigavon, County Armagh, BT63 5PP on 5th November 2015.</p> <p>The Stronger Together submission to the “Prevent Strategic Priority” is:</p> <ul style="list-style-type: none">• To add the Stronger Together programme to the Human Trafficking Action Plans for Northern Ireland for 2015/16;• To discuss with Stronger Together how to deliver a more coordinated communication plan with business in Northern Ireland;• To discuss with Stronger Together how its resources may best meet the needs of Northern Ireland business.	
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British Red Cross	<p>The Red Cross welcomes many of the objectives and actions under 'Prevent' and considers that the following should be included:</p> <ul style="list-style-type: none"> • Actions to require comprehensive and coherent collection of data for the purpose of monitoring and evaluating the legislative and policy framework on trafficking and exploitation, and on ensuring qualitative research focusing on the experiences of victims regardless of National Referral Mechanism status; 	<p>We are currently working on legislation to implement the duty to notify about suspected victims of human trafficking or slavery offences. This is intended to enhance our understanding of the scale of human trafficking and slavery-type practice in Northern Ireland.</p>
	<ul style="list-style-type: none"> • Under the objective on 'engagement with the private sector', an action on developing links with recruitment agencies; 	<p>This is already taking place. For example, in March 2015 DEL and DOJ working together, provided information on Tackling Human Trafficking, Slavery and Forced Labour in Northern Ireland' which was intended to raise awareness particularly in non-GLA sectors and within the recruitment sector of the signs and indicators of labour exploitation and what to do if concerned. We will look for further opportunities to build on this.</p>

	<ul style="list-style-type: none"> • A further objective on engaging with other organisations / groups that have a direct link to the workforce, such as trade unions, which may potentially have direct contact with individual victims or receive information about alleged perpetrators of human trafficking and exploitation. 	<p>Understand that Trade Unions have already engaged on this issue (a motion was passed in 2010).</p> <p>ICTU is represented on the Human Trafficking Engagement Group. We recognise the role of Trade Unions and plan to engage with them further. This is now reflected in the strategy.</p>
Belfast Trust	<p>YES</p> <p>The Trust is of the view that the actions in the Draft Strategy relating to the Prevent objectives are appropriate and clearly demonstrate a commitment to progress the Prevention agenda.</p> <p>The Trust acknowledges the work and commitment of the range of organisations delivering on the actions detailed.</p> <p>At this time the Trust has not identified any additional actions and considers the actions set as helpful and consistent with the objectives set.</p>	Noted.
Western Trust	YES	HSCB has responded:

	<p>The Western Trust agrees with the proposed actions within strategic priority 3 and welcomes the opportunity to promote awareness amongst key sectors within HSC Trusts such as medical and social work. Developing and delivering on training also bears a resource burden and it would be useful to consider how awareness raising for these professional groups, could be integrated appropriately within existing training such as adult safeguarding, with a more detailed training available for a smaller quorum of key professionals.</p> <p>Extensive thought should be given to raising the profile of the issue at a community and societal level, which includes targeting vulnerable groups.</p>	<p>This is a matter for Trusts where such training is being delivered locally and requires internal coordination within HSC Trust Children and Adult Training Services. Where it applies regionally the HSC Trust trainers regional group should address. Clearly there also needs to be a coordinated approach adopted across the various organisations who are delivering relevant training to ensure connectivity and inclusivity to avoid duplication and maximise training available.</p>
IJM	<p>We believe these actions are appropriate and make the following comments:</p> <p>We have engaged with several schools and student groups, and many church and community groups, over the past few years</p>	Noted.

	<p>taking sessions highlighting issues of violence globally including the matter of human trafficking. We are pleased to be part of educating on these crimes, and considering how each of us can be part of responding.</p>	
	<p>As labour exploitation represented the majority of those rescued in 2014, there must be work done with people at particular risk of this type of exploitation.</p>	<p>Agreed – the strategy seeks to address human trafficking for forced labour.</p>
	<p>We would be pleased to assist the DOJ in any further training being carried out, where that is useful. We believe our expertise due to years of working around the world on this issue means we can speak with authority – and importantly, showing progress is possible.</p>	<p>Noted.</p>
	<p>We are aware that it is crucial to look at supply chains and look forward to the results of the TISC consultation. We are encouraged that there is education ongoing around the public demand for goods such as coffee and chocolate and how individuals can respond to this in a way which</p>	<p>Noted.</p>

	reduces demand for exploitation. We continue to talk about these issues in our sessions where appropriate.	
HSCB	<p>YES</p> <p>The actions appear to support the strategic objectives.</p> <p>The actions correctly identify the linkages between Child Sexual Exploitation (CSE) and human trafficking and make the correct linkages to the SBNI.</p> <p>However, we would suggest an amendment to one of the actions to read as follows:</p> <p>“DoJ to deliver awareness training on <i>all aspects of human trafficking, including</i> human trafficking for the purposes of child sexual exploitation.”</p>	Agreed. Strategy has been amended.
NICEM	<p>While the current draft Strategy does cover a number of key issues in its actions under this section, some additional actions must be considered in order to establish a thorough system for preventing trafficking in NI.</p> <p>NICEM recommends that an action be added</p>	Comments passed onto UKHTC and Home Office.

	<p>under the objective ‘capture learning over time’ to undertake and publish data collection on the ethnicity of referred individuals by reasonable grounds and conclusive grounds decisions. Furthermore, complete data on the reasonable and conclusive grounds decisions of referrals by country of origin should be published.</p> <p>NICEM also recommends that an action be added committing to updating the PSNI’s Service Procedure on forced marriage, so that signs of forced marriage can be identified and appropriate actions taken by law enforcement authorities.</p>	<p>Outside scope of strategy. But will pass comments to PSNI.</p>
	<p>NICEM also recommends that an action be added under the objective ‘targeted engagement and awareness raising with key sectors’ to provide training to border officials on indicators of trafficking.</p>	<p>Such training is already in place.</p>
	<p>NICEM further recommends that an action be added under the objectives ‘raising public</p>	<p>DOJ has attended two training session for Registrars to speak about the signs of human trafficking for</p>

	awareness of the signs and indicators of human trafficking, slavery and forced labour' to provide information to marriage officiators on indicators of trafficking and forced marriage.	forced marriage and has distributed tailored material to all Registrars through the General Register Office (GRO).
Law Centre NI	In relation to Objective No. 3, we suggest that Department of Justice includes an action point about liaising with the judiciary, PPS and Criminal Cases Review Commission to ensure that victims of trafficking are not prosecuted for crimes committed under duress.	A statutory defence is already place and PPS has issued guidance on this matter. The Strategy also commits us to engaging with the Judicial Studies Board.
	We believe it would be a very useful exercise to review prosecutions (e.g. since implementation of NRM in 2009) to ensure that any wrongful convictions of victims of trafficking are identified and referred to the Criminal Cases Review Commission for investigation.	We have sought to raise awareness of the signs that potential victims of human trafficking may have ended up in prison. We have engaged with the Criminal Cases Review Commission about the work that we have taken forward this work in prisons. It would not be feasible to review all prosecutions.
Belfast PCSP	YES Work with airline industry / ports to enhance their knowledge of human trafficking and provide their staff with the tools needed to identify the	Not able to take this forward at present due to resource constraints, although some awareness work has been taken forward both by NGOs on the Engagement Group and . This is something that

	behavioural indicators associated with trafficking.	could perhaps be looked at in future strategies.
	Explore greater co-operation with international partners in transit and source countries.	The strategy is aligned with the UK-wide Modern Slavery Strategy. One of the commitments in the Modern Slavery Strategy is to increase cooperation with international partners to better investigate and prosecute cases of modern slavery in source, transit or destination countries.
BMEWN	<p>It is important for preventative actions to be targeted, in order to improve their effectiveness. As noted above, the National Crime Agency gathers data on the country of origin of potential trafficking victims. This data could be utilised to identify States that are common sources of trafficking and a relationship could subsequently be developed with these States to deliver preventative actions.</p> <p>This approach has been adopted on a UK level in the past, with the UK's 2011 Human Trafficking Strategy committing to "greater awareness raising in source countries to reduce the supply of potential victims"; a</p>	This is a UK Government lead. Home Office, DfID and FCO already carry out targeted work in specific countries of origin. Such work is considered by IDMG, which the Minister of Justice sits on, however we believe it is most appropriately situated within the UK's national Modern Slavery Strategy.

	<p>tactic that was later hailed as “effective”.</p> <p>Further relevant to prevention is the need to tackle intra-State trafficking within the UK. The UK itself has been one of the top ten sources of trafficking victims encountered within the UK since 2012.²² Intra-state trafficking requires a particular approach, as it involves the trafficking of UK citizens within their home State.</p> <p>Key to preventing this type of trafficking is reducing the vulnerability of people living within the UK, so that traffickers are less able to take advantage. The Inter-Departmental Ministerial Group on Human Trafficking highlighted that victims of intra-UK trafficking are largely men being trafficked for the purposes of labour exploitation and vulnerable young women who are sexually exploited by groups of men.</p> <p>The UNGIFT has highlighted that vulnerability to human trafficking is ‘usually the result of...practices and policies that fail to ensure equal access and protection to all members of</p>	<p>Agreed - internal trafficking is something which DOJ and partner agencies and NGOs are very much alert to and the strategy seeks to address this type of trafficking along with other types. Good links and co-operation are in place between law enforcement and other Government Departments in our neighbouring jurisdictions, including on a cross-border basis.</p>
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	<p>society'. Both poverty and gender have been highlighted by this organisation as 'vulnerable conditions' for the purpose of increasing risk of being trafficked. There is a clear link between these 'vulnerable conditions' and the type of intra-State trafficking that is occurring in the UK. Thus, it is clear that as long as people living in the UK are sufficiently desperate for employment, or are left vulnerable due to their gender, then intra-UK trafficking will continue to proliferate. Producing actions to tackle these realities in NI are key to preventing this form of trafficking.</p>	
	<p>The need to collaborate with employers and employment agencies in preventing trafficking is also of relevance. It is notable that Section 54 of the Modern Slavery Act 2015 applies to NI, meaning that employers will be required to produce a human trafficking statement on the integrity of their supply chains and the policies they have in place relating to slavery</p>	<p>DOJ is working with the Home Office on this issue. After consideration of the consultation responses, the Home Office has decided to set the turnover threshold at £36m per year. This means that all commercial organisations carrying on business in the UK with a total turnover of £36m or more will be required to complete a slavery and trafficking statement for each financial year of the organisation.</p>

	<p>and human trafficking.</p> <p>Consequently, it would seem timely to deliver combined training to employers and employment agencies on both their obligations under this Section and more generally on developing policies to help prevent their business from utilising exploitative labour. It is notable that the Home Office produces practical guidance for employers that could be a useful resource in delivering training.</p> <p>The BMEWN recommends that current data on victims' countries of origin be used to develop targeted preventative initiatives in cooperation with key states.</p> <p>It is also recommended that actions be taken under the Strategy to prevent trafficking through reducing the vulnerability of those who are disadvantaged by gender inequalities and/or economic status.</p> <p>Furthermore, it is recommended that training be delivered to employers and employment</p>	<p>Guidance will be published for those organisations required to produce a slavery and trafficking statement.</p> <p>A number of the existing objectives relate to engagement with employers and the private sector.</p>
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	<p>agencies on their obligations under Section 56 of the Modern Slavery Act 2015, how to develop policies to prevent their business from utilising exploitative labour, indicators of human trafficking and what procedures to follow if they suspect that an individual has been trafficked.</p>	
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Strategic priority 4: Partnership

7(a). In your opinion are these proposed objectives appropriate? Are there any additional objectives that in your opinion should also be included?

Organisation/individual	Comments	DOJ response
Craigavon Trades Council	These objectives are appropriate.	Noted.
Women's Forum NI	YES	Noted.
CARE NI	YES We agree that these proposed objectives are appropriate.	Noted.
Northern HSCT	YES See 4b and 6a & 6b.	Noted.
Armagh City, Banbridge,	YES	The strategy includes an action around developing

and Craigavon Borough Council	It would be useful to tap into the cyber security expertise of both public and private sector providers – foster partnerships and collaboration in order to better identify and target on line CSE.	understanding of online recruitment. We recognise that CSE is a related issue but feel that it is best dealt with separately. The Department’s “Tackling Child Sexual Exploitation in Northern Ireland” action plan was published in March 2015.
	Collaborative work could usefully be implemented with government and NGOs in the countries where the victims are from, in order to identify available support structures.	The strategy is aligned with the UK-wide Modern Slavery Strategy. One of the commitments in the Modern Slavery Strategy is to increase cooperation with international partners to better investigate and prosecute cases of modern slavery in source, transit or destination countries.
	Make use of PCSPs as key contacts within the community, in order to raise awareness and support the coordination of partnership work at local levels.	Agreed. The Strategy contains an action for DOJ to deliver awareness training on human trafficking to PCSPs
	Support community confidence in reporting through practical engagement with community groups and PSNI within existing PCSP frameworks.	Agreed. Awareness activities aim to improve public confidence in reporting suspicions of human trafficking or slavery.
	We recognise the global impact of this work and that it requires different countries working	The strategy is aligned with the UK-wide Modern Slavery Strategy. One of the commitments in the

	together to create a climate which makes it more difficult for trafficking to take place.	Modern Slavery Strategy is to increase cooperation with international partners to better investigate and prosecute cases of modern slavery in source, transit or destination countries.
	With the onset of community planning, promotion of best practice with Community Planning Partnerships to ensure practical implementation of the awareness raising, training and identification of support networks and potential for reporting and information sharing at local levels.	We recognise the value of this engagement, however, we need to prioritise engagement with PCSPs at this stage.
	Support information sharing and collaborative work with statutory agencies to include those with responsibility for regulating employment conditions e.g. HMRC, DARD, DELNI.	Noted and agreed.
	A review of implementation should be included and targets/outcomes publicised.	Progress reports against the previous two year's human trafficking action plans were published on a biannual basis. Biannual updates will also be published for this strategy and future strategies going forward.
Voice of Young People	YES	Noted.

in Care	VOYPIC welcomes strategic priority 4: Partnership and believes the proposed objectives are appropriate.	
NISMP	Objective 1: Cooperation between relevant statutory agencies should include agencies with responsibility for employment regulation.	GLA and DEL Employment Agency Inspectorate are represented on the OCTF Immigration and Human Trafficking Subgroup. Membership of the Subgroup is to be reviewed in October 2015.
	Objective 3: The 3 year review of the engagement group should also include a review of Immigration and Human Trafficking subgroup of OCTF.	We do not consider this to be a priority at this stage, however we do plan to review membership of the OCTF subgroup later this year.
	While we understand that the multi-disciplinary decision making panels are being piloted in England, the inclusion of an additional objective (or an additional activity under objective 2) to set the groundwork for the establishment of such a panel in Northern Ireland, will help ensure the integrity and independence of the decision making process.	We wish to take stock of early lessons learned from pilots in England and Wales first. Preparatory work can nevertheless be taken forward.
	PCSPs should be given a clear role in the implementation of this strategy, being ideally	We are actively engaging with PCSPs and they are represented on the Human Trafficking Engagement

	positioned to both raise awareness and support the coordination of work at a local level.	Group.
Belfast Trust	<p>YES</p> <p>The Trust is of the view that the objectives detailed in the Draft Strategy relating to the Partnership priority are appropriate and consistent with the strategic aim.</p> <p>The projected outcomes associated with the objectives set seem reasonable and the ability to update outcomes through the Annual Action Plan is beneficial in terms of a framework going forward.</p> <p>At this time the Trust has not identified any additional objectives and considers the objectives set as helpful and consistent with the Strategic priorities.</p>	Noted.
Western Trust	<p>YES</p> <p>The Western Trust agrees with the proposed strategic objectives to enhance the delivery of an effective partnership response to human</p>	Noted.

	<p>trafficking and exploitation. Working effectively together by reducing duplication and collectively using limited resources in a more efficient way is to be welcomed.</p> <p>The WDVP Partnership has a strategic priority to rationalise and maximise existing and emerging fora to share information; ensure non replication of services and provide additionality. We are also in a location where cross –border co-operation is working in practice. The Partnership and its member agencies and their extended partnership networks could be harnessed in the same way in terms of trafficking and exploitation.</p> <p>The strategy emphasizes the shared responsibility in addressing the issue.</p>	
IJM	<p>We believe these Objectives are appropriate and make the following comments:</p> <p>We congratulate the Department of Justice in all it has already done to ensure collaborative working, for example, the setting up of the</p>	Noted.

	Engagement Group with civil society organisations.	
	We welcome the intention to continue building strong links with other UK jurisdictions, the Republic of Ireland and, indeed, pan-European links.	Noted.
	We note that since there have been individuals recovered in NI from outside of Europe (with countries of origin ranging from China to Vietnam to South Korea), what efforts will be made to collaborate and share information beyond European jurisdictions?	We will continue to utilise the existing mechanisms for international co-operation between law enforcement where appropriate. The UK Government retains primacy in respect of international relations.
Paula McVeigh	YES	Noted.
HSCB	YES The proposed objectives support the strategic aim of “partnership”.	Noted.
NICEM	It is notable that the UK is a member of some non-European international bodies that facilitate cooperation on issues of trafficking, for example the UN Global Initiative to Fight Human Trafficking (UNGIFT).	Noted.

	<p>The UNGIFT Steering Committee is comprised of six international organisations – the ILO, IOM, OHCHR, OSCE, UNICEF and the UN Office on Drugs and Crime - which coordinate members’ anti-trafficking activities. The core activities of the UNGIFT include disseminating information amongst members, supporting coherence amongst key actors and establishing a global dialogue between victims and key actors.</p> <p>Consequently, the Strategy should ensure that its objectives aim to facilitate partnership on a global level as well as a pan-European level.</p> <p>NICEM recommends that the final objective listed under this priority be edited to read: ‘Building strong pan-European and global links’.</p>	<p>Agreed.</p>
Belfast PCSP	<p>YES</p> <p>There also needs to be strong engagement with the Home Office. It is concerning that the Home Office does not published</p>	<p>Immigration is a reserved matter and therefore outside the scope of DOJ. The National Crime Agency <u>does</u> publish disaggregated statistics in respect of modern slavery, including information relating to the country of</p>

	<p>disaggregated figures for NI, in relation to the number of asylum applications it receives, number of detentions, deportations etc.</p> <p>Without access to published immigration data, it is very difficult to view trafficking in the wider context. This impedes policy development and planning. It is recommended that the Home Office starts publishing regional immigration data.</p>	<p>origin and the competent authority.</p> <p>Comments will be passed to the Home Office.</p>
	<p>Explore further the role that the public can play in identifying information about trafficking.</p>	<p>Engaging with the public is an ongoing priority and this is already reflected in the strategy.</p>
SINI	<p>YES</p> <p>SINI believes if all of the above objectives were achieved, then NI would be a place where the traffickers would not want to be.</p> <p>The major element is that of all organisations working as one and not going it alone.</p>	<p>Noted.</p>
BMEWN	<p>The BMEWN considers these objectives to be broadly reasonable, although it would recommend further actions to implement them, as detailed below.</p>	

Strategic priority 4: Partnership

7(b). In your opinion are these proposed actions appropriate? Are there any additional actions that in your opinion should also be included?

Organisation/individual	Comments	DOJ response
Craigavon Trades Council	Craigavon Trades Council would be in favour of a cross border forum as long as it does not exclude any relevant groups. This forum would need to have a clear remit to set objectives and targets.	Noted.
	The DOJ human trafficking team meetings with DOJE anti human trafficking unit must also have a clear remit and the ability to respond to changes/situations so as to re prioritise action plans.	Noted.
	With regard to legislation we feel Northern Ireland must adopt a “parity plus” approach. Consistency with other parts of UK must only be where improvements are made.	Agreed. This is already the case.
	Craigavon Trades Council is surprised at the need to specify a duty of co-operation from	We believe that it will be beneficial to put the duty to cooperate on a statutory footing, to ensure that the

	public authorities; we would also expect a similar duty to apply to any organisation the Commissioner would contact.	Anti-Slavery Commissioner always has timely access to the information that he needs to do his job. The duty to cooperate will only apply to specified public authorities, as it would be difficult to place such as duty of non-statutory agencies. However, we anticipate that most civil society groups would be willing to engage with the Commissioner.
	The collaboration with pan European projects and monitoring developments in the European Union is essential.	Noted.
	Craigavon Trades Council could only support an Assisted Voluntary Return policy after close examination of any such proposals.	Noted.
Women's Forum NI	YES	Noted.
CARE NI	YES We agree that these actions are appropriate.	Noted.
Northern HSCT	YES Simplified systems to enhance communications and deliver smarter services in a more timely way.	Noted.
Armagh City, Banbridge	YES	Noted.

and Craigavon Borough Council	Welcome plans for improved co-ordination and outlining a clear duty/responsibility to co-operate with the Anti-Slavery commissioner.	
	Support the need to share best practice, in particular highlight “Good News Stories”.	Agreed. The Department and its partners regularly promote activities/events held to tackle human trafficking and slavery.
	A global concern, hence the partnership work within a wider European context is fundamental.	Noted.
Voice of Young People in Care	YES We believe that cooperation between relevant statutory agencies is crucial to pursue and prevent human trafficking and exploitation. It is important that all relevant agencies understand the role and responsibilities they have and that systems are in place to facilitate this cooperation and information sharing.	Agreed.
	The Children’s Services Co-operation Bill is currently at Committee stage at the Northern Ireland Assembly. The Committee for the Office of First and Deputy First Minister have	Noted.

	<p>published their consideration on the Bill including proposed amendments. We fully support this Bill and believe it will help achieve the actions above, in particular cooperation between government departments and relevant statutory agencies.</p>	
Belfast Trust	<p>YES</p> <p>The Trust is of the view that the actions detailed in the Draft Strategy relating to the Partnership objectives are appropriate.</p> <p>The Trust recognises the role of DOJ in terms of its leadership in relation to human trafficking and exploitation, and the contribution of partner agencies.</p> <p>Overall the Trust views the Strategy for 15/16 positively and will continue to work collaboratively work with those involved to deliver on this.</p>	Noted
Western Trust	<p>The Western Trust agrees with the proposed actions as outlined under strategic priority 4 - partnership. The sharing of appropriate</p>	Noted

	<p>information with relevant partners is to be welcomed. Emphasis needs to be placed also on maintaining and strengthening links with key stakeholders and organizations such as housing, health and social care. The legislative framework is pivotal in protecting and supporting victims, and ensuring disruption and prosecution for offenders. However, the impact, daily lives and trauma experienced by individuals also requires workers in these organizations to have a competent knowledge and skill base in order to effectively support and protect them.</p>	
IJM	<p>We believe these actions are appropriate and we welcome them.</p> <p>We note that there are several action points regarding meetings and forums to encourage collaborative working. We wonder if the development of a shared database would be useful to share and co-ordinate information, and take this a step further.</p>	<p>We are satisfied that the existing arrangements are appropriate and we publish appropriate information on the OCTF website.</p>

Paula McVeigh	YES Cross-border data sharing between agencies would be required, not simply scope the potential for such sharing.	Preparatory work is needed before the implementation of any data sharing arrangements across different jurisdictions.
	Given the current migrant crisis in Europe, action should be taken to ensure that information is shared across borders at a European level.	This is a UK Government lead.
HSCB	YES The actions identify the elements of effective partnership working, the identification of best practice and the identification of lessons learned. The HSCB is keen to work with the DoJ to ensure that arrangements to co-operate with the Anti-Slavery Commissioner are as effective and resource-efficient as possible.	Agreed.
NICEM	NICEM recommends that the finalised Strategy include an action under the objective ‘cooperation between relevant statutory agencies’ to ensure that	We are committed to ensuring appropriate engagement and communication and are satisfied that the existing objectives are comprehensive enough to cover this.

	<p>employment monitoring bodies are represented on the Human Trafficking Engagement Group.</p>	
	<p>NICEM also recommends that the Strategy include an action under the amended objective building strong pan-European and global links' committing to working through extant international bodies that tackle trafficking (including UNGIFT) to share information and build an international approach to addressing trafficking issues.</p>	<p>Agreed.</p>
<p>Law Centre NI</p>	<p>Objective No.3 is: "<i>Appropriate information sharing</i>". We recommend that a projected outcome of "<i>increased prosecutions</i>" is included as an indication of partnership working, identification of best practice and lessons learned. Indeed, we suggest that "<i>sharing best practice</i>" and "<i>increased prosecutions</i>" are also inserted into Objective 4 and 5.</p>	<p>We have revised the strategy to reflect sharing best practice and effective prosecutions as projected outcomes.</p>

	We also recommend that “ <i>co-ordinating employment enforcement agencies</i> ” is inserted as an identified action and that ownership should rest with DEL.	Not accepted
	We welcome the identified action in Objective 4: to “ <i>conduct a biennial analysis of victim referrals, on a cross-border basis, to identify key learning points and common themes</i> ”. We propose the OCTF Victim Profile paper as a very useful report; it would be useful for information and comparative purposes if this publication could be issued regularly and if there was a similar publication covering the Republic of Ireland. ⁸	We regret that our resources do not allow us to take this recommendation forward within the period of the strategy, however we will work closely with NCA and Home Office to ensure appropriate and effective statistical analysis.
	Also in relation to Objective No. 5, we suggest that the first action “ <i>ensure that NI legislation surrounding human trafficking and slavery is consistent with legislation across the UK,</i>	We are currently engaging with other Departments in to consider whether the scope of the NRM in Northern Ireland should be extended to cover all victims of modern slavery. As such we are not yet in a position to

⁸ <http://www.octf.gov.uk/Publications/Human-Trafficking/Strategic-Profile-Potential-Victims-of-Human-Traff>

	<i>where appropriate</i> ” is amended to ensure that protections are equally available for victims of trafficking and victims of forced labour (see our preliminary comments).	comment on or accept this recommendation.
	An identified action in Objective No 6 is to “inform the Anti-Slavery Commissioner’s strategic plan”. We recommend that this action should read” to inform <i>and influence</i> the Anti-Slavery Commissioner’s strategic plan <i>so as to ensure specific Northern Ireland perspectives are embedded</i> ”.	Agreed
Belfast PCSP	Work with the Home Office to obtain regional data in relation to the number of asylum applications it receives, number of detentions, deportations etc. so as to understand trafficking in the wider context.	Immigration is a reserved matter and therefore outside the scope of DOJ. The National Crime Agency <u>does</u> publish disaggregated statistics in respect of modern slavery, including information relating to the country of origin and the competent authority.
SINI	YES SINI looks forward to welcomes all plans for improved co-ordination. We believe that it is important for everyone to have a duty and a	The legislation provides the Minister with powers to specify <u>public authorities</u> as under a duty to co-operate with the Commissioner. We want to ensure that the duty is relevant and meaningful and are currently

	/responsibility to co-operate with the Anti-Slavery commissioner.	consulting separately on this issue.
BMEWN	<p>As has been emphasised throughout this response, there is a need to consider global cooperation alongside cross-border and European cooperation in tackling trafficking. There are a number of international organisations, such as UNGIFT and Interpol, which can provide valuable resources, such as information and training.</p> <p>Furthermore, bilateral arrangements with individual states can be helpful in both pursuing and preventing trafficking, as regards the establishment of cooperative investigations and the implementation of targeted preventative initiatives across borders.</p> <p>Further concerning partnership, the fact that NGOs will likely lose their status as first responders following revisions to the NRM means that the maintenance of a strong</p>	<p>Noted.</p> <p>Noted.</p> <p>The DOJ is fully committed to engaging with NGOs who work on issues of human trafficking.</p>

	<p>relationship between these agencies and the Department of Justice is more important than ever. As well as maintaining information links with NGOs through its Trafficking engagement Group, there is a need for the Department to ensure that NGOs are adequately funded to perform anti-trafficking activities.</p> <p>Indeed, research has indicated that a lack of funding for anti-trafficking NGOs can result in inadequate assessments of the impact of anti-trafficking measures taken by governments and an inability for NGOs to develop long-term outcomes.</p> <p>The BMEWN reemphasises the above recommendations concerning the need to include actions that ensure global cooperation, beyond the context of cross-border and pan-European collaboration.</p> <p>The BMEWN recommends that the finalised Strategy make a commitment that anti-trafficking work by NGOs will be</p>	<p>Noted.</p> <p>DOJ is committed to funding the delivery of support and assistance to potential adult victims under our victim care contracts.</p>
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	adequately funded.	
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General comments		
Organisation/individual	Comments	DOJ response
NSPCC	<p>NSPCC welcome the proposed strategy and are encouraged by the Departments continued commitment to driving out human trafficking, slavery and forced labour in Northern Ireland.</p> <p>The strategy builds on the effective, coordinated partnership approach to tackling human trafficking in which NSPCC's Child Trafficking Advice Centre (CTAC) and the Modern Slavery Helpline have played a key role. It is through these networks and our representation on the Organised Crime Task Force's (OCTF) and the Regional Network Separated and Trafficked Children that we have worked collaboratively to drive change on this very complex issue.</p> <p>We are pleased that our continued efforts in</p>	Noted.

	<p>responding to victims of human trafficking have been acknowledged in the Strategy and we are fully committed to delivering on our targeted actions over the coming year.</p>	
DARD	<p>DARD has considered the consultation document and is content with the draft strategy. DARD currently funds the work of the Gangmasters Licensing Authority (GLA) in Northern Ireland and recognises the role that the GLA, as a potential “first responder”, plays in helping to identify instances of suspected human trafficking and exploitation.</p>	Noted.
	<p>DARD wishes to highlight the requirement that rural proofing is undertaken on the development of any new policies and strategies, the review of existing policies and strategies, and the consequent design and delivery of public services. DARD therefore wishes to seek assurance that the Draft Northern Ireland Human Trafficking and Exploitation Strategy 2015/16 has been rural</p>	<p>From considering the aide memoire in the guidance “Thinking Rural: The Essential Guide to Rural Proofing,” which was produced by DARD, we have screened out the need for a rural proofing assessment is necessary as the strategy would not have a differential impact on rural areas.</p>

	proofed.	
British Red Cross	<p>The Red Cross welcomes the Department of Justice consultation on the Strategy and its pre-consultation engagement with civil society partners on the Human Trafficking Engagement Group. It also welcomes the progress that has been made as outlined in the Strategy including the new legislative framework, trainings delivered to key statutory agencies, and targeted engagements with key actors. The Red Cross considers that the Department of Justice should build upon this approach to ensure civil society participation in the Strategy’s further development, implementation and evaluation, as well as mechanisms to facilitate the participation of victims and those who may be at risk of trafficking and exploitation.</p>	<p>We are satisfied that we have consulted widely on the development of the strategy and it has been fully informed by engagement with civil society. We will continue to work closely with civil society partners on future policy development.</p>
	<p>Special measures should also be adopted to ensure the views of children are heard</p>	<p>Noted</p>

	<p>and taken into account in accordance with Article 12 of the UN Convention on the Rights of the Child.</p>	
	<p>The Red Cross is increasingly being called upon to provide support to help migrants who become destitute while living in the UK. The circumstances around each individual's situation vary; however, a number are victims of trafficking and/or exploitation. In this respect, a small proportion have been through the National Referral Mechanism and are living in Northern Ireland with limited access to support. But a greater proportion do not wish to enter the National Referral Mechanism or may be reluctant to identify as victims of trafficking or exploitation for many reasons including fear, shame and uncertainty about the consequences, or having been forced to commit a crime. Some are unaware that they have been trafficked or exploited and therefore may not identify as a victim. A key</p>	<p>A number of organisations represented on the Human Trafficking Engagement Group provide support to suspected victims of trafficking outside the scope for the NRM.</p> <p>Many actions are already in place to increase confidence in the justice system and to encourage victims to agree to a referral into the NRM. These include a new statutory defence for slavery and trafficking victims in relation to certain offences. However, matters relating to immigration status are reserved and DOJ has no powers.</p>

	<p>priority for the Red Cross is therefore to improve support to all trafficked and exploited people and we ask the Department of Justice to consider how it can include actions within the Strategy aimed at supporting people regardless of National Referral Mechanism status.</p>	
	<p>The Red Cross is aware that people may have been, or are potentially being, exploited but do not meet the threshold for trafficking. Since 31 July 2015, following on the enactment of the Modern Slavery Act 2015, the support provided through the National Referral Mechanism in England and Wales extends to all forms of modern slavery. But the statutory framework created by the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 does not reference slavery, servitude and forced or compulsory labour (hereafter 'slavery') within its provisions on 'assistance and support'. We</p>	<p>Arrangements in Northern Ireland comply with the EU Directive on preventing and combating trafficking in human beings and protecting its victims.</p> <p>The NRM in Northern Ireland currently only extends to victims of human trafficking. DOJNI is currently engaging with other relevant NI Departments on whether NRM provision should be extended to all victims of modern slavery.</p> <p>This includes consideration of affordability.</p> <p>We wish to be informed by the early lessons from the initial piloting phase in England and Wales.</p>

	<p>are concerned that this leaves a gap in support for victims of slavery in Northern Ireland. The Red Cross considers that the Department of Justice should prioritise, and include as a key objective within the Strategy, the development of a comprehensive legislative and policy framework to ensure assistance and support for all victims of slavery, and examine if the extension of the National Referral Mechanism to such victims in Northern Ireland would form part of an effective approach in achieving this.</p>	
	<p>The legislative and policy gap in relation to support and assistance for slavery victims is, we believe, reflected within the Strategy as several of its outcomes or actions refer to victims of human trafficking only. For example, under ‘Priority 2: Protect and Support’, the action on ensuring those assisting criminal investigations can avail of the discretionary</p>	<p>Discretionary leave is a reserved matter. We understand that Home Office has extended equivalent entitlements to Discretionary Leave to all victims of Modern Slavery who are cooperating with the Criminal Justice System.</p> <p>As noted, however, the NRM in Northern Ireland currently only extends to victims of human trafficking.</p>

	<p>leave scheme refers only to ‘victims of human trafficking’;⁹ the action on the signposting of information, guidance and support is for ‘potential victims of human trafficking’; and the projected outcome that ‘victims of human trafficking are appropriately compensated’ has no corresponding outcome for those who have experienced slavery. The Red Cross considers that the Strategy should be reviewed to ensure objectives, outcomes, and actions include victims of slavery as well as human trafficking.</p>	<p>DOJNI is currently engaging with other relevant NI Departments on whether NRM provision should be extended to all victims of modern slavery. This includes consideration of affordability.</p>
	<p>The Red Cross understands that section 12 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 requires the Strategy to cover provisions aimed at raising awareness victims’ rights and entitlements,</p>	<p>Noted.</p>

⁹ As above, note 1, pp.68 and 69, Home Office guidance notes that although the National Referral Mechanism in Northern Ireland and Scotland does not include victims of slavery who have not been trafficked, it is possible that a First Responder may refer such a person to the NRM. While a negative decision will result and the person will have no further NRM involvement, he or she can still request consideration under the discretionary leave policy at the ‘reasonable grounds’ stage; victims of slavery in Northern Ireland and Scotland who do not enter the NRM can also be considered for discretionary leave by contacting the UKVI Trafficking Hub.

	<p>but we believe the Strategy should go further by seeking to ensure and enhance rights protection. Indeed, p. 25 of the Strategy states that Priority 2: Protect and Support' is about 'ensuring victims' rights and interests are protected and upheld.' The Red Cross considers that in addition to raising awareness of victims' rights and entitlements, the Strategy should include objectives to ensure and enhance victims' rights with associated actions to examine and remedy any gaps or failings in current laws, policy and/ or practice in this respect.</p>	
	<p>The Red Cross welcomes the fact that Department of Justice has drawn upon the findings of a recent Organised Crime Task Force report on potential victims of human trafficking in Northern Ireland.¹⁰ However, its</p>	<p>The duty to report on specified authorities will provide a clearer picture.</p>

¹⁰ Organised Crime Task Force, *Strategic Profile: Potential Victims of Human Trafficking \recovered in Northern Ireland (Period covered 01 April 2009 – 12 August 2013)*, February 2015, p.8.

	<p>analysis relies solely on cases referred to the National Referral Mechanism, and therefore includes only a proportion of potential cases. As the report itself states:</p> <p>‘Information gained through National Referral Mechanism (NRM) data will only give part of the picture in relation human trafficking in Northern Ireland. Adult potential victims of human trafficking are required to ‘opt in’ to the NRM, however failure to do so does not necessarily mean they are not genuine victims, or that they were not provided with help by statutory agencies or charities.’</p>	
	<p>The report profiles potential victims on the basis of quantitative data (e.g. age, gender, exploitation type). The Red Cross believes such data essential in understanding how to improve support for victims. It is equally important to gather qualitative data based on people’s subjective perceptions and experiences of trafficking and the services</p>	<p>The strategy is informed by engagement with victim advocates. One of the functions of the Independent Anti-Slavery Commissioner is to undertake or support the carrying out of research. We will want to be informed by such research.</p> <p>Affordability is also a consideration.</p>

	<p>available in Northern Ireland. The Red Cross therefore considers that (i) the Strategy should be informed by a broader range of existing research that includes the experiences of those who have not entered the National Referral Mechanism and (ii) qualitative as well as quantitative research should be commissioned to inform the future development, evaluation and monitoring of the Strategy.</p>	
	<p>The Red Cross would like the Department of Justice to recognise the inextricable link between victims of human trafficking and exploitation in Northern Ireland and the UK asylum system. The Organised Crime Task Force report identified that of those identified as victims of human trafficking in Northern Ireland, “26% had an asylum claim or were exploited within the fishing industry,” and that an additional 6% were refused asylum seekers. It is also worth highlighting that “half</p>	<p>The UK asylum system is a reserved matter and outside the scope of this strategy.</p> <p>We will raise concerns with the Home Office.</p>

	<p>of the potential victims of sexual exploitation were in Northern Ireland legally, one quarter were asylum seekers.” A much fuller investigation of how those within the asylum system are considered vulnerable to human trafficking and exploitation is required. It is also necessary to examine how victims enter and experience the immigration and asylum process. For instance, how does the immigration status of trafficking victims allow for psychosocial and financial support in line with their status as victims and ensure protection from traffickers?</p>	
	<p>Given the interconnection between trafficking and exploitation and asylum issues, the Red Cross considers this cannot be fully understood and addressed without greater attention being paid to the asylum system and the groups that support asylum seekers in Northern Ireland. We call upon the Department of</p>	<p>We have limited resources and have developed the strategy on the basis of identified priorities. We recognise the prospective value of this but are unable to commit to participation at this time.</p>

	<p>Justice to ensure a greater focus on this, to actively participate in relevant inter-agency forums, particularly the Immigration Sub-Group of the Racial Equality Forum, which engages with the refugee and asylum seeking community, and to include this as a key action within the Strategy.</p>	
	<p>The Red Cross is concerned that there is a potential interconnection between immigration status and National Referral Mechanism decisions, as evidence suggests people from non-EU countries have a lower rate of positive conclusive grounds. For example, the Group of Experts on Action Against Trafficking in Human Beings reported that, according to statistics from the first two years of the National Referral Mechanism, '[the] proportion of persons who were conclusively identified as victims of trafficking varies depending on the nationality: 86% of UK nationals, 71% of other</p>	<p>The Home Office has conducted a review of the NRM and is currently piloting multi-agency in England and Wales as an alternative to Competent Authorities. We await the outcome and lessons learned from those pilots.</p>

	<p>EU/EEA nationals, and 21% of non-EU/EEA nationals were positively identified.’¹¹ The Red Cross therefore asks that an action is included within the Strategy to examine and keep under review any potential relation between immigration status and National Referral Mechanism decisions.</p>	
	<p>Page 14 lists a number of documents used to inform the Strategy’s content. There is no reference to instruments or documents setting out the human rights of victims of trafficking or exploitation such as the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR), the EU Directive 2011/36/EU on Preventing and Combating Trafficking in Human Beings and Protecting its Victims (the EU Directive), and the Council of Europe Convention on Action</p>	<p>In listing the documents that have informed development of the strategy we have focused specifically on human trafficking and slavery strategies. This is not intended to be a comprehensive list, however, and would emphasise that we have been mindful of our wider obligations under the ECHR.</p> <p>The strategy also builds on the previous two year’s action plans which were heavily informed by GRETA recommendations.</p>

¹¹ E.g. Group of Experts on Action against Trafficking in Human Beings (GRETA), *Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by the United Kingdom*, 12 September 2012 http://www.coe.int/t/dghl/monitoring/trafficking/Docs/Reports/GRETA_2012_6_FGR_GBR_en.pdf (accessed 12.08.15), ‘The proportion of persons who were conclusively identified as victims of trafficking varies depending on the nationality: 86% of UK nationals, 71% of other EU/EEA nationals, and 21% of non-EU/EEA nationals were positively identified’ (para. 217).

	<p>Against Trafficking in Human Beings (the CoE Convention). The Red Cross recommends that these and other instruments relating to the human rights of victims, as well as the findings of monitoring bodies (e.g. the 2012 GRETA report)¹² are used to inform the Strategy's content.</p>	
	<p>The Red Cross believes the voluntary sector has a key role to play in helping the authorities respond to human trafficking and exploitation in Northern Ireland. Victims may be wary of the police and other authorities, particularly if they have been coerced into committing a crime. The voluntary sector provides a safe space for victims to express their fears and concerns without placing themselves in a compromising situation. This makes the voluntary sector well placed (as part of a network of support) to understand and</p>	<p>Work with the voluntary sector and civil society is throughout the strategy and is particularly highlighted in Priority 4. Voluntary sector partners on the Engagement Group are delivery partners in the Strategy. We believe the critical role played by NGOs and civil society and our ongoing commitment to working in partnership is already adequately reflected in the strategy.</p>

¹² Group of Experts on Action against Trafficking in Human Beings (GRETA), *Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by the United Kingdom*, 12 September 2012 http://www.coe.int/t/dghl/monitoring/trafficking/Docs/Reports/GRETA_2012_6_FGR_GBR_en.pdf (accessed 12.08.15).

	<p>respond to the personal circumstances that surround trafficking and exploitation including providing advice, support and financial assistance if the individual is facing destitution. Importantly, the voluntary sector provides opportunities for victims, and those at risk of trafficking and /or exploitation, to engage with others such as in cultural or sporting activities. This creates a support network for people to find new friends and confide their situation to others. The Red Cross considers that the voluntary sector in particular can play a key role in accessing and supporting vulnerable people who may have been trafficked and/or exploited or are at risk of this. Working with the voluntary sector and with trafficked and exploited people directly to prevent trafficking and exploitation and to protect and support victims should be a key objective across all priorities within the Strategy.</p>	
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<p>Information Commissioner's Office</p>	<p>The Information Commissioner's Office (the ICO) welcomes the opportunity to comment on the draft Human Trafficking and Exploitation Strategy 2015/2016. As the UK's independent body to oversee and enforce the Data Protection Act 1998 (the DPA), the ICO has a vested interest in ensuring that the strategy is compliant with the DPA, and would highlight the fact that serious breaches of the DPA could result in enforcement action being taken by the Commissioner.</p> <p>We understand that Section 12 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 places a requirement on the Department of Justice (DOJ) to produce an annual strategy on offences under sections 1 and 2 of the Act. The purpose of the strategy is to 'equip Northern Ireland to drive out human trafficking, slavery and forced labour', and is underpinned by four areas of priority -</p>	<p>We are mindful of our obligations under the DPA and other statutory requirements. Appropriate data protection protocols will be in place against each specific action.</p> <p>We have conducted a screening exercise which has concluded that there is not a need for the entire strategy to have a Privacy Impact Assessment.</p>
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‘pursue’, ‘protect and support’, ‘prevent’ and ‘partnership’. We welcome the opportunity to comment on the aspects of the strategy that may impact on data protection.

Information sharing

The Foreword of the draft strategy acknowledges that partnership is a key thread in tackling human trafficking and exploitation and therefore agencies must work in co-operation with one another. For partnership work to be effective, relevant information and intelligence will need to be shared with key agencies, across various jurisdictions.

The draft strategy outlines certain objectives and actions to support each of the priority areas, several of which rely upon the exchange of information to detect and tackle human trafficking. Priority areas 1, 2 and 4 contain actions which will involve the sharing of information between cross border statutory agencies in the UK, Republic of Ireland and

	<p>Europe.</p> <p>We note that several actions within the strategy refer to scoping the need for data sharing with certain agencies. To assist with this process, we would recommend that a 'privacy impact assessment' (PIA) is carried out to identify any risks posed to an individual's privacy, and that solutions and safeguards are adopted to eliminate/minimise these risks. For example, when scoping the need to share personal data with any agency, it should be considered whether there is a need to use data which identifies an individual. If it is the case that the objective can be achieved by using anonymised data, then this would be the preferable option.</p> <p>We would remind DOJ that any information sharing must comply with the DPA.</p> <p>Systematic data sharing should be governed by written agreements between the agencies involved, and should address issues such as</p>	
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	<p>fairness and transparency, relevance, accuracy, retention and security of the data.</p> <p>We emphasise the need for appropriate technical and organisational measures to protect personal data, which in the case of human trafficking, will most often be of a sensitive nature. Data sharing agreements should be drafted in line with the ICO Data Sharing Code of Practice, which is a statutory code published under section 52 of the DPA.</p> <p>The Code provides practical measures that can be taken to comply with the legal requirements of the DPA.</p> <p>Fair processing</p> <p>We welcome the objectives and actions within the draft strategy in relation to protecting and supporting victims in the criminal justice system. In many cases it will be necessary for some personal details of these victims and witnesses to be supplied to other agencies to provide support and assistance. Any agency</p>	
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	<p>involved in the processing of information relating to these individuals must be satisfied that they comply with the DPA, and in particular, the first data protection principle which says information must be processed fairly and lawfully. This requires the organisation to be fair to individuals by clearly explaining the purposes for which their data is used, and any other information which would make it fair in the particular circumstances (including if the information will be shared with another organisation).</p> <p>Furthermore, the first principle requires an organisation to satisfy a condition for processing from Schedule 2 of the DPA, and in the case of sensitive personal data, a further condition from Schedule 3. 'Consent' is one of the conditions for processing contained in Schedule 2, and 'explicit consent' in Schedule 3. If this is the condition that the organisation chooses to rely upon to process</p>	
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	<p>this data, they must consider the best way to obtain valid consent, i.e. consent which is fully informed, specific and freely given. Victims are likely to be in a vulnerable state, and may have little, if any, understanding of the legal system of Northern Ireland. In addition to this, language barriers may also be an issue for some individuals, therefore, consideration must be given as to how valid consent is truly obtained in these cases.</p> <p>Rights of individuals</p> <p>In line with the objective on protecting and supporting victims, one of the proposed outcomes is to uphold victim's rights and interests. This may present an opportunity to make individuals aware of their right to access their personal data under the DPA. However, agencies should be mindful that it may not always be in an individual's interests for them to access certain information about themselves. The Data Protection (Subject</p>	
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	<p>Access Modification) (Health) Order 2000 contains an exemption from Section 7 of the DPA to the extent to which application of this section would be likely to cause serious harm to the physical or mental health or condition of the data subject or any other person.</p> <p>Finally, we would welcome an invitation to engage with any of the agencies involved in the human trafficking framework and provide further advice and guidance on information rights in respect of the actions outlined in this strategy.</p>	
<p>Northern Ireland Policing Board</p>	<p>The Board particularly welcomes the identification of internal trafficking of minors for sexual exploitation, particularly those who have been in the care system, as a key vulnerability. This issue was previously identified by Barnardo's Northern Ireland in their 2011 report Not a world away: The sexual exploitation of children and young people in Northern Ireland. PSNI's</p>	<p>Noted.</p>

	<p>subsequent investigation, Operation Owl, undertaken alongside partner agencies into allegations that children from residential care were at risk of sexual exploitation, demonstrated that CSE in this form could only be addressed by closer partnership between statutory and non-statutory agencies.</p>	
	<p>Given the importance of partnership working, particularly the accurate and timely sharing of information between relevant agencies, the Northern Ireland Human Trafficking and Exploitation Strategy 2015/16 could have provided more explicit detail of how closer relationships between these agencies will be fostered. With particular reference to internal trafficking of minors for sexual exploitation, I welcome the level of detail provided under the action points contained in the Tackling Child Sexual Exploitation in Northern Ireland Action Plan which the DOJ have recently updated. It would be beneficial if a similar level of detail</p>	<p>This is a high level strategy. Two key partnerships are in place in Northern Ireland:</p> <ul style="list-style-type: none"> - The Human Trafficking Engagement Group; and - The OCTF Immigration and Human Trafficking Subgroup. <p>Members of these Groups are key delivery partners in the Strategy. Full membership lists are now set out at Annex A of the final Strategy.</p>

	<p>could also be outlined under the strategic priorities of Pursue, Protect & Support, Prevent and Partnership in the 2015/2016 Strategy.</p>	
	<p>As the Board's Performance Committee previously indicated in response to the Department's 2014 consultation Human Trafficking and Slavery: Strengthening Northern Ireland's response, Members are supportive of the proposal to place a statutory duty on public sector first responders to report all suspected cases of human trafficking to the UKHTC for addition to the National Referral Mechanism, provided that this information is anonymised where an adult potential victim has not consented to this referral. Such a provision would undoubtedly prove valuable in providing more accurate trends, patterns and overall levels of human trafficking in Northern Ireland. This would allow PSNI to use their resources more efficiently and effectively to</p>	<p>A short targeted consultation on the implementation of Section 13 of the Human Trafficking and Exploitation Act (NI) 2015 will be launched shortly and we envisage that an SL1 will be brought to the Justice Committee in November 2015.</p>

	<p>not only disrupt, investigate and prosecute the perpetrators of this type of crime, but also ensure the development of training and education of officers and best practice in supporting victims. I would be grateful if you could confirm whether the Department plan to implement this proposal under the Protect and Support strategic priority.</p>	
	<p>The Board also welcomes that, in terms of maritime enforcement, the DOJ will ensure that effective accountability arrangements are put in place where general enforcement powers, not limited to pursuit situations in Northern Ireland waters are extended to the UK Border Force. The Board's Performance Committee previously corresponded with the Minister on this issue and expressed its view that if UK Border Force officers were granted powers of a constable to act IN Northern Ireland waters it would be important that public complaints or allegations of misconduct</p>	<p>A code of practice on exercise of maritime powers under the Modern Slavery Act 2015 will be consulted on shortly and the Department will write to update the Board on developments.</p>

	<p>could be investigated by the Police Ombudsman. Likewise Members proposed that a mechanism be put in place whereby the Director General of the UK Border Force would keep the Board informed of any operations which are not undertaken in conjunction with the PSNI in Northern Ireland waters. I would be grateful if the Board could be provided with an update on the provision of appropriate accountability mechanisms whenever the process has been finalised.</p>	
NIPSA	<p>NIPSA has a long and proud history of advancing the highest standards of equality, human rights and social justice. We are therefore concerned that the important role trade unions play in this field is not recognized in the list of key stakeholders set out in section 3.</p>	<p>ICTU is represented on the Human Trafficking Engagement group.</p> <p>We recognise the important role of Trade Unions and plan to engage with them further. This is now reflected in the strategy.</p>
	<p>NIPSA sees trafficking on a spectrum of wider labour abuses. To effectively tackle trafficking, it is important to focus on tackling</p>	<p>The OCTF Subgroup provides a forum for appropriate coordination between relevant organisations. Membership will be reviewed in October 2015. The strategy remains focused on the</p>

	<p>widespread abuse in the labour market. We are seriously concerned at the marked increase in labour exploitation (71%) reported in Annex A. We believe the likely elements associated with a risk of forced labour include low-skill manual and low-paid work; temporary agency work; and specific industrial sectors. The definition and scope of forced labour is poorly understood, including differences between human trafficking, slavery and exploitation. While a better understanding of these issues would be useful it is also important to consider actions that make the labour market less hospitable to abuse. In this way it is important to focus on sectors where there are high levels of vulnerable workers such as agriculture, labouring, food processing and hotels and leisure sectors. It is important to consider how to improve conditions within these sectors. NIPSA believes that an approach which couples</p>	<p>more serious end of the spectrum of exploitation, though we recognise the need for appropriate engagement with a wide range of bodies overseeing labour practices.</p>
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	<p>regulation and sectoral bargaining could make a real difference to the level of severe abuse that exists, while also improving the general wellbeing of workers in these sectors.</p>	
	<p>It must be recognised that forced labour provides disreputable companies with an unfair trading advantage. This fact, coupled with moral reasons, means that employers associated with the Ethical Trading Initiative were keen to include a supply chains element within the Modern Slavery Bill. It is also why mandatory approaches are more favourable than voluntary codes as they make requirements that apply to all employers and encourage transparency within the supply chain. There is nothing in this Strategy that sets out how supply chains function and how transparency and ethical standards can be promoted.</p> <p>A key approach to tackling trafficking is to ensure that large companies and the public</p>	<p>The Trafficking in Supply Chains provision in the Modern Slavery Act 2015 extends to Northern Ireland. The strategy includes an action to ensure these provisions are implemented in this jurisdiction.</p>

	<p>sector are properly taking responsibility for what is happening within their own supply chains. This should form a key element of any anti-trafficking strategy and procurement should also be used to improve practice and to favour employers who sign up to sectoral agreements on pay and working conditions. NIPSA recognises that sectoral bargaining cannot be mandated by the Northern Ireland Executive to the private sector but we also believe that a voluntary scheme coupled with clear procurement practice and the legislative footing of the Modern Slavery Bill could give a strong start to an approach of this kind.</p>	
	<p>In a study carried out by the Anti-Trafficking Monitoring Group¹³ it called for a more localised NRM in Northern Ireland and a local infrastructure of support in accordance with the obligations of the Convention. NIPSA</p>	<p>Following the review of the National Referral Mechanism (NRM), multi-agency panels are currently being piloted in England and Wales as an alternative to Competent Authorities. We await the outcome and lessons learned from those pilots.</p>

¹³ Northern Ireland section except from the report: *“Wrong kind of Victim?”* One year on: an analysis of UK resources to protect trafficked persons (2010).

	<p>supports this recommendation as we believe the establishment of a more localised mechanism that reflects the specificity of Northern Ireland's structures and victims' needs is necessary for the effective operation of these arrangements and the provision of comprehensive assistance and protection for victims.</p>	
	<p>We understand the primary role as First Responders in relation to adult victims is with the PSNI. However we also understand other agencies have been designated. NIPSA would support the recommendations contained in the Anti-Trafficking Monitoring Group report¹⁴ that other organisations, such as Women's Aid, who have the expertise in supporting trafficked persons are designated as First Responders, in the same way that Migrant Help has been designated. We therefore strongly recommend that this issue</p>	<p>We recognise the role of NGOs in highlighting incidents of human trafficking. However, informed by discussions with the PSNI and Health and Social Care Board, the Justice Minister has determined that First Responders should be statutory agencies. This is to enable effective streamlining of information and to ensure a consistent approach. We recognise that this arrangement needs to be supported by effective communication channels with NGOs.</p>

¹⁴ Ibid, pages 4 and 5.

	is adequately addressed within this Strategy.	
	<p>One of the criticisms coming out of The Anti-Trafficking Monitoring Group report was the limited access and professionalism of interpreting services available in Northern Ireland which forces certain practitioners to rely on interpreters working over the telephone or others whose independence and links with the community speaking their language are not sufficiently clear to be sure that they are not influenced by traffickers. It is important that this under-provision is addressed as a matter of urgency and the Strategy sets out specifically what professional interpreting services are available and their contact details. NIPSA would also suggest that this service is identified separately in Strategic Priority 2 (Protect and Support) on available support and information services.</p>	<p>Interpreter/translation services are available through the DOJ support contract. In addition PSNI and other criminal justice agencies are able to make draw on a pool of interpretation services.</p>
	One of the key findings from The Anti-	We recognise the challenge of gathering reliable

	<p>Trafficking Monitoring Groups reports in 2010 and 2013¹⁵ and a scoping study carried out by the Northern Ireland Human Rights Commission and the Equality Commission into the nature and extent of human trafficking in Northern Ireland¹⁶ was the lack of available data. The researchers found there were no systems of data collection that would allow for a comprehensive assessment of the scale and nature of human trafficking in Northern Ireland. The Convention requires States Parties to conduct research and collect, analyse and share information on trafficking, in order that the problem is understood and that prevention efforts are targeted and based on evidence. It is therefore important that an information sharing protocol is established as part of this Strategy and Action Plan which will</p>	<p>information. We believe that the new duty to report on specified public authorities, provided for under section 13 of the 2015 Act, will supplement and data provided through the NRM and the NCA Strategic Baseline Assessment and will provide a clearer picture.</p>
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¹⁵ The Anti-Trafficking Monitoring Group: All Changes Preventing Trafficking in the UK, Devolved Policies (2012).

¹⁶ NIHRC and ECNI: The Nature and Extent of Human Trafficking in Northern Ireland – A Scoping Study by Institute of Conflict Research 2009

	<p>allow for a multi-agency approach for the collection and publishing of relevant data on the extent of human trafficking in Northern Ireland, the number of persons identified as presumed trafficked persons (initially and also as a result of both “reasonable grounds” and conclusive decisions) and the number of traffickers arrested, charged and successfully prosecuted under trafficking and trafficking-related offences.</p>	
	<p>One of our key concerns regarding support for recovered victims is available funding for counselling. Currently funding is provided for counselling during the period of recovery and reflection (45 days). It is the experience of organisations such as Women’s Aid and others that the provision of counselling is just as important and necessary for potential victims after this period and consequently the necessary funding and provision should be provided.</p>	<p>DHSSPS has responded: “Entitlement to health and social care which could include ‘counselling’, for persons not ordinarily resident in Northern Ireland, is subject to a complex interplay between EU legislation, UK Immigration law and domestic legislation. In relation to confirmed victims the “Working Arrangements for the Welfare and Protection of Adult Victims of Human Trafficking – 2012” apply and state at paragraph 7.19:- <i>“It will not be necessary for the HSC Trust to consider</i></p>

	<p>We do not see any reference to support being provided on welfare and employment which was one of the recommendations in the NIHRC/ECNI scoping study.</p>	<p><i>entitlement to access health and social care in the case of confirmed victims of trafficking who have been given discretionary leave to remain in the UK, refugee status or humanitarian protection. However, assessment under the care management process, which is needs-driven, will determine what, if any, care services will be provided”.</i></p> <p>We would consider that the ‘care services’ would include counselling.</p> <p>The Working Arrangements for the Welfare and Protection of Adult Victims of Human Trafficking. Paragraphs 1.7, 7.2, 7.7, 7.10 and 7.19 are also relevant.”</p> <p>Post Recovery and Reflection period, entitlement is available dependent on the right to remain in the United Kingdom. Where an individual is cooperating with criminal proceedings, or where personal circumstances warrant it, Discretionary Leave can be granted, and support accessed, in line with the EU Directive on preventing and combating trafficking in</p>
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		human beings and protecting its victims.
	<p>Key to the success of this Strategy and Action Plan is not only the provision of necessary resources but also appropriate training. The identification of victims of trafficking at the earliest opportunity is vital to the provision of safety and support. Victims may often come into brief, or even extended, contact with a number of voluntary organisations and statutory bodies. It is essential that staff at all potential points of contact are properly trained in identification protocols and are aware of procedures for reporting suspected cases to support organisations and the police.</p>	<p>Agreed – training continues to be a key priority for the Department and its partners.</p>
	<p>We would strongly urge that clear mechanisms for support such as education, training, counselling for trauma are laid down and that appropriate measures are allocated for this. It will be important for the Government to work with organisations such as Women’s Aid to establish pathways out of</p>	<p>Support relating to education, training and counselling is available through the DOJ support contract.</p> <p>Pathways out of prostitution are outside the scope of this strategy which focuses on the response to human trafficking and slavery servitude and forced or compulsory labour. DHSSPS is responsible for the</p>

	<p>prostitution and comprehensive support structures for women in and exiting prostitution. Victims of all forms of exploitation must be able to seek help without fear of criminalisation, marginalisation or deportation.</p>	<p>development of a strategy on pathways out of prostitution, under section 19 of the 2015 Act. That is separate to this strategy.</p>
	<p>We support measures, such as those introduced in Italy, which identify trafficked people and other forced labourers as victims or crime rather than “illegal immigrants” and treats them accordingly.</p> <p>Measures which permit trafficked people to regularise their status, either temporarily or permanently in the country in which they have been exploited, will encourage them to come forward and testify against the traffickers because it removes the danger of immediate deportation.</p>	<p>Where a person is identified as a victim of trafficking under the NRM, the UK must ensure that they have access to all entitlements under the EU Directive on preventing and combating trafficking in human beings and protecting its victims. This includes, where necessary, discretionary leave to remain in the UK where the individual is cooperating with criminal proceedings, in line with the EU Directive.</p>
	<p>We are concerned to hear the remarks from the Council of Europe’s Group of Experts on Action on Trafficking in a report from September 2012 (<i>Report concerning the implementation of the Council of Europe</i></p>	<p>Section 22 of the Human Trafficking and Exploitation Act 2015 provides a statutory defence for victims of modern slavery offences who have been compelled to commit certain offences.</p>

	<p><i>Convention on Action against Trafficking in Human Beings by the United Kingdom)</i> regarding information that victims of trafficking have been arrested, prosecuted and convicted in relation to immigration or other offences. We would support their call for authorities to step up their efforts to adopt a victim centred approach and that potential victims of trafficking should not be punished for immigration related offences.</p>	<p>PPS Guidance to all Legal staff was issued in May 2014 on prosecuting cases involving trafficking. following the introduction of the Human Trafficking and Exploitation Act 2015, the PPS issued a Staff Instruction which provides guidance to prosecutors who are considering cases in which a person suspected of committing a criminal offence may be a victim of human trafficking or slavery. It includes the defence provided for in the 2015 Act as well as the common law defence of duress and the importance of the Public Interest in such cases and explains the process to be followed by prosecutors in such cases.</p>
UglyMugs.ie	<p>EQUALITY IMPACT UglyMugs.ie would like to query the Department of Justice's assertion that an Equality Impact Assessment (EQIA) is not required. UglyMugs.ie believes that, to date, many anti-trafficking activities carried out by public authorities in Northern Ireland have clearly had adverse impacts on sex workers, many of whom are women and foreign</p>	<p>We remain satisfied that a full EQIA is not required. The Strategy is intended to afford greater protections to vulnerable persons including women and foreign nationals who may be exploited.</p>

	nationals.	
	<p>ENGAGEMENT GROUPS & NEW WORKING GROUP</p> <p>The importance of partnerships between public authorities and civil society in combatting trafficking is widely acknowledged. Since the formation of the ‘Engagement Groups’ that facilitate this in Northern Ireland in 2013 UglyMugs.ie has expressed grave concern about the lack of representation on these Groups of persons or organisations that could represent people selling sex. UglyMugs.ie feels that this has to date represented a very serious failing with Northern Ireland’s response to trafficking. UglyMugs.ie welcomes the recent agreement that the Department of Justice will form a new Working Group to include the sex work community in their anti-trafficking work which will include UglyMugs.ie, SWAI (Sex Workers Alliance Ireland) and others. UglyMugs.ie</p>	<p>Agreed. An action has been added to the Partnership strand of the strategy to reflect the establishment of a Sex Worker Liaison Group on Human Trafficking.</p>

	<p>would of course like to see this new Working Group included in the Northern Ireland Human Trafficking and Exploitation Strategy for 2015/16.</p>	
	<p>ANALYSIS OF OFFICIAL DATA ON VICTIMS OF TRAFFICKING FOR SEXUAL EXPLOITATION</p> <p>In order to combat trafficking for sexual exploitation meaningful information is needed. UglyMugs.ie believes further analysis is needed of the official data on victims of trafficking for sexual exploitation.</p> <p>UglyMugs.ie notes the publication of the OCTF report 'Strategic Profile - Potential Victims of Human Trafficking recovered in N.I.' in February 2015. However UglyMugs.ie feels this report did not provide answers to many questions. For example, no information was included about how many of the potential victims received a positive conclusive decision and were therefore found to have been</p>	<p>We are not in a position to deliver against this suggestion at this stage but will keep under review.</p>

	<p>trafficked, which seems a serious omission.</p> <p>There appears to be many important questions we don't know the answers to like:</p> <p>How many potential victims of trafficking for sexual exploitation reported being exploited in prostitution, as opposed to other forms of sexual exploitation?</p> <p>How many potential victims of trafficking for sexual exploitation reported having been sexually exploited in Northern Ireland as opposed to prior to their arrival in Northern Ireland?</p> <p>Where potential victims of trafficking for sexual exploitation reported being exploited in prostitution, how did that prostitution occur, for example was it within a closed network or in a more mainstream setting?</p> <p>It also needs to be noted that UK law on trafficking into prostitution does not require any element of coercion to be present. This means that victims of trafficking for sexual</p>	
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	<p>exploitation in Northern Ireland can be persons who have chosen to work as sex workers. However no information appears to be available yet about how many of the potential victims of trafficking for sexual exploitation identified in Northern Ireland to date are people who have chosen to work as sex workers, as opposed to persons who have been subject to deceit, force or coercion.</p>	
	<p>DECRIMINALISATION OF SEX WORK</p> <p>The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 criminalised the purchase of sexual services. Despite many claims to the contrary it did not “criminalise the buyer of sex and decriminalise the seller”. Indoor sex workers remain liable to be prosecuted for brothel keeping if they do not work alone and no serious consideration of this issue appears to have taken place to date.</p>	<p>This recommendation relates primarily to sex worker rights and is therefore outside the scope of the strategy which needs to remain focused on issues <u>directly</u> linked to addressing human trafficking and other forms of modern slavery.</p>

	<p>UglyMugs.ie requests that the Department of Justice looks at decriminalisation of sex work in terms of the positive impact that could have on anti-trafficking efforts.</p> <p>Many leading anti-trafficking organisations support decriminalisation of sex work, for example the Global Alliance Against Traffic in Women and La Strada International.</p> <p>Amnesty International recent stated “We believe that decriminalization would help tackle trafficking. When sex work is decriminalized, sex workers are better able work together and demand their rights, leading to better working conditions and standards and greater oversight of commercial sex and potential trafficking within it. When they are not threatened with criminalization, sex workers are also able to collaborate with law enforcement to identify traffickers and victims of trafficking.</p> <p>Organizations such as the Global Alliance</p>	
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	<p>Against Trafficking in Women, Anti -Slavery International and the International Labour Organisation agree that decriminalization has a positive role to play. It fosters increased recognition of the rights of people who sell sex and can help end human rights violations against them, including trafficking.”</p>	
Law Centre NI	<p>We find the Department of Justice annual Human Trafficking Action plans and the interim reports on these plans very helpful. We see these reports as a valid evaluation of progress and a way in which to measure outcomes. The Law Centre, as a member of the Department of Justice NGO Engagement Group, values the opportunity to feed into both documents and congratulates the Department for the progress it has made.</p>	Noted
	<p>The EU Strategy is clear that primary responsibility for addressing human trafficking lies with Member States.¹⁷ Clearly, things are</p>	<p>We note the comments. The Department is committed to taking all possible and appropriate action to tackle modern slavery and we will</p>

¹⁷ http://ec.europa.eu/home-affairs/doc_centre/crime/docs/trafficking_in_human_beings_eradication-2012_2016_en.pdf, page 5

	<p>a little more complex in the United Kingdom given the different jurisdictions and devolution. We think it might be useful if the Ministerial Foreword includes a statement about the Department's leadership and responsibilities in respect of addressing human trafficking. We believe that the Department of Justice should command the <i>fullest possible remit</i> for combatting trafficking, not least because Northern Ireland has responsibility for human rights, criminal justice and employment law. For example, the Department of Justice may wish to express its legitimate interest in immigration enforcement potentially where it intersects with potential victims of trafficking. The Department is very clear about the need to protect and support victims. It should not countenance any possibility of a two-tier system arising in Northern Ireland whereby the victims' experience of protection and support depends on whether they are</p>	<p>continue to work effectively with partners in other jurisdictions. The IDMG and OCTF subgroup, respectively, provide appropriate fora for issues or concerns to be highlighted in respect of reserved matters, as necessary. Nonetheless, as the comments note, immigration is a reserved matter and primacy remains with the relevant authorities within the UK Government.</p>
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	<p>encountered by NI agencies (e.g. PSNI, DEL inspectors,) or by Home Office immigration enforcement.</p>	
	<p>There is currently a disconnect between Home Office policy in England and Northern Ireland that needs addressing. New Home Office guidance is clear that victims of forced labour (who are not victims of trafficking) can be referred into the National Referral Mechanism in England.¹⁸ We welcome this development as we believe that all victims of modern slavery should be entitled to support and assistance.</p> <p>We understand that the Department of Justice is looking at this issue in Northern Ireland. We would urge the Department to bring Northern Ireland policy in line with the Home Office guidance. This will ensure a much clearer pathway for victims of forced labour and will</p>	<p>Arrangements in Northern Ireland comply with the EU Directive on preventing and combating trafficking in human beings and protecting its victims.</p> <p>The NRM in Northern Ireland currently only extends to victims of human trafficking. DOJNI is currently engaging with other relevant NI Departments on whether NRM provision should be extended to all victims of modern slavery.</p> <p>This includes consideration of affordability.</p> <p>We wish to be informed by the early lessons from the initial piloting phase in England and Wales.</p>

¹⁸ Home Office, 'Victims of Modern Slavery: Competent Authority Guidance' (July 2015)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/450842/Competent_authority_guidance_v2_0_ext.pdf

	<p>remove the current anomaly whereby a victim of forced labour in Northern Ireland may be entitled to apply for Discretionary Leave to Remain (thereby gaining access to social security and the labour market) and yet does not have a clear entitlement to assistance under the National Referral Mechanism.¹⁹</p>	
	<p>While much of the Strategy rightly focusses on immediate / short-term actions, we think some consideration of long-term actions / responses would also be useful. For example, an initiative that would help increase our collective understanding of human trafficking in Northern Ireland would be if the Department of Justice were to commission longitudinal research that looks at the experiences of victims of trafficking <u>post NRM</u>. This research could examine the long-term effects of trafficking and the (re)integration of victims</p>	<p>We recognise there would be value in this, however we need to prioritise our actions and resources are not available to take this forward at present. We will keep under consideration for the future.</p>

¹⁹ We are mindful that, in practice, victims of forced labour in Northern Ireland have been able to avail of support and assistance (which is to be welcomed) . We hope that this can now be embedded into policy.

	<p>who continue to reside in Northern Ireland as well as those who decide to return home to their country of origin. This would provide a very interesting long-term perspective on the availability and effectiveness of support provisions to victims of trafficking.</p>	
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