

# Consultation

## **‘Leaving Prostitution: a strategy for help and support’**

**September – October 2015**



Department of  
**Health, Social Services  
and Public Safety**

[www.dhsspsni.gov.uk](http://www.dhsspsni.gov.uk)

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# 1. Background

The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 came into operation in Northern Ireland on 14 January 2015. The objective of the Act is to provide Northern Ireland with a more robust legal framework in relation to:

- the prosecution of traffickers and those subjecting people in Northern Ireland to conditions of slavery;
- the provision of improved support for victims; and
- tackling the demand for the services of trafficked victims.

Section 19 of the Act requires the Department of Health, Social Services and Public Safety ('DHSSPS'), along with other Northern Ireland Government departments, to prepare and publish a Strategy for those wishing to leave prostitution that will outline the actions to be taken by departments to ensure that a Programme of Assistance and Support ('PAS') is in place for people who want to leave prostitution.

DHSSPS has developed a draft Strategy, 'Leaving Prostitution: a strategy for help and support', which includes information on what format the PAS is likely to take. The draft Strategy is provided at **Annex A**. This consultation seeks your views on the draft Strategy and how it might be improved. A consultation response questionnaire is provided at **Annex B**.

# 2. How to Respond

The consultation runs from **11 September 2015** and the closing date for comments is **23 October 2015**. Responses received after this date **will not be considered** due to the tight legislative deadline.

The response questionnaire is provided at **Annex B** of this consultation document and you can also download a Word version of the questionnaire separately from the DHSSPS website at:

<http://www.dhsspsni.gov.uk/index/consultations.htm>

Please send your response or any other queries you may have to:

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Please note that all responses will be treated as public and may be published on the DHSSPS website. If you do not want your response to be used in this way, or if you would prefer for it to be used anonymously, please see the 'Confidentiality and Access to Information Legislation' section of the questionnaire for more details.

This document is available, on request, in alternative formats - braille, audio, large print etc. The Department will consider requests to produce this document in other languages.

If you require the document in these or other formats, please contact Gary Gregg on the contact details above.

# **‘Leaving Prostitution: a strategy for help and support’**

**Strategy under Section 19 of the Human Trafficking and  
Exploitation (Criminal Justice and Support for Victims) Act  
(Northern Ireland) 2015**

# **Ministerial Foreword**

The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 requires my Department, in conjunction with other NI departments, to develop a Strategy that will introduce a Programme of assistance and support for anyone who wants to leave prostitution.

People who want to exit prostitution can face barriers to doing so. For example, some people involved in prostitution may have become involved due to drug or alcohol abuse and need the income to meet the cost of their addiction. For others, prostitution may provide an income which they would find it difficult to attain by other means. Whatever the barrier, we want to provide help and support to those who have decided the time has come for them to give up prostitution.

This Strategy sets out, for consultation, how we propose to achieve this. This is a complex and difficult issue and we are keen to hear from a range of perspectives, indeed we have tried to work with a range of people in the development of this strategy. I am very grateful for the engagement we have received so far and look forward to responses we will receive in response to this consultation.

**Simon Hamilton MLA**  
**Minister of Health, Social Services and Public Safety**

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# 1. Introduction

- 1.1 The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015<sup>1</sup> ('the Act') came into operation in Northern Ireland on 14 January 2015. The objective of the Act is to provide Northern Ireland with a more robust legal framework in relation to:
- the prosecution of traffickers and those subjecting people in Northern Ireland to conditions of slavery;
  - the provision of improved support for victims; and
  - tackling the demand for the services of trafficked victims.
- 1.2 Section 19 of the Act<sup>2</sup> requires the Department of Health, Social Services and Public Safety ('DHSSPS'), along with other Northern Ireland Government departments, to prepare and publish a Strategy that will outline the actions to be taken by departments to ensure that a Programme of Assistance and Support ('PAS') is in place for people who want to leave prostitution.
- 1.3 The sole aim of the Strategy is to set out the actions to be taken to develop the PAS. In doing this, the Strategy:
- provides a background to prostitution in Northern Ireland;
  - identifies and considers the barriers to exiting prostitution and the services currently available to those who want to do so; and
  - sets out the DHSSPS proposal for the PAS, including how the PAS will be monitored and evaluated.
- 1.4 For some people involved in prostitution, the long-term damage, both emotionally and physically, can be significant. Once an individual becomes involved in prostitution it can be difficult to find a route out; the PAS will identify opportunities for doing so.
- 1.5 The Strategy has been developed primarily by DHSSPS in conjunction with officials from other Northern Ireland departments.
- 1.6 It should be remembered throughout this Strategy that prostitution is not a crime in Northern Ireland.

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<sup>1</sup> <http://www.legislation.gov.uk/nia/2015/2/contents/enacted>

<sup>2</sup> <http://www.legislation.gov.uk/nia/2015/2/section/19>



## 2. Definitions and Scope

2.1 Some of the terms used to describe prostitution and the provision of sexual services can be interpreted in different ways, depending on both the context and the reader. It is therefore important to be clear about what the key terms used in this Strategy mean. This section sets out how the Strategy defines these key terms and who the Programme of Assistance and Support ('PAS') is ultimately intended for.

### (a) Key Definitions

2.2 Section 19(1) of the Act requires DHSSPS to prepare a Strategy which will support the introduction of a PAS for anyone wanting to leave prostitution. Section 19(7) states that the definition of the term 'prostitution' should be taken from the Sexual Offences (Northern Ireland) Order 2008 ('the Order').

2.3 Article 58(2) of the Order<sup>3</sup> defines 'prostitute' and 'prostitution' as follows:

*“Prostitute’ means a person (A) who, on at least one occasion and whether or not compelled to do so, offers or provides sexual services to another person in return for payment or a promise of payment to A or a third person; and ‘prostitution’ is to be interpreted accordingly.”*

2.4 Article 58(3) of the Order defines 'payment' as:

*“... any financial advantage, including the discharge of an obligation to pay or the provision of goods or services (including sexual services) gratuitously or at a discount.”*

2.5 The term 'sexual services' is not specifically defined in the Order but the term 'sexual' is. Article 4 of the Order<sup>4</sup> says:

*“penetration, touching or any other activity is sexual if a reasonable person would consider that—*

*(a) whatever its circumstances or any person's purpose in relation to it, it is because of its nature sexual, or*

*(b) because of its nature it may be sexual and because of its circumstances or the purpose of any person in relation to it (or both), it is sexual.”*

2.6 In layman's terms, the Order effectively says that 'prostitution' is the provision of any sexual services in exchange for some sort of payment; and, subsequently, a 'prostitute' is a person who provides these sexual services.

<sup>3</sup> <http://www.legislation.gov.uk/nisi/2008/1769/article/58>

<sup>4</sup> <http://www.legislation.gov.uk/nisi/2008/1769/article/4>

Beyond “penetration” and “touching” the legislation does not provide a comprehensive list of activities deemed sexual; however it does state that this includes activity understood by a reasonable person to be sexual in nature.

**2.7 Throughout this document the provision of any sexual services in exchange for payment will be referred to as ‘prostitution’ and those people providing the services will be referred to as being ‘involved in prostitution’.**

## **(b) Who is in scope?**

### **In scope**

2.8 While the definitions above may be open to wider interpretation, the common understanding of the term prostitution is that the purchaser is physically in the presence of those providing the service. It is in this scenario where those involved in prostitution may be more vulnerable and at risk of harm or exploitation.

2.9 This may include, but is not limited to, women and men involved in the following areas:

- street prostitution;
- indoor prostitution (e.g. homes, hotels etc);
- escorting; and
- brothels.

2.10 The initial PAS will be primarily directed to support these more vulnerable individuals who wish to leave prostitution.

### **Out of scope**

#### **Children and prostitution**

2.11 Child sexual exploitation is a form of sexual abuse. Children and young people under the age of 18 who are being sexually exploited should be treated as victims of abuse.

2.12 The revised policy guidance ‘Co-operating to Safeguard Children and Young People in Northern Ireland’<sup>5</sup>, which has been updated to reflect changes in structures and legislation since it was last published in May 2003, incorporates specific guidance for professionals, practitioners, children, young people, parents and carers relating to sexual exploitation of children and young people.

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<sup>5</sup> <http://www.dhsspsni.gov.uk/showconsultations?txtid=77621>

2.13 Where a person suspects that a child or young person is being sexually exploited, they should call PSNI on 999 or call Crimestoppers anonymously on 0800 555 111.

### **Victims of human trafficking**

2.14 Tailored provision is already in place in respect of assistance and support for victims and potential victims of human trafficking. The National Referral Mechanism (NRM) is a process that identifies victims of human trafficking in the United Kingdom. Official statistics from the NRM identify sexual exploitation in connection with almost 50% of potential victims of human trafficking who have been recovered in Northern Ireland (figures correct as at 30 September 2014). In some of these cases the sexual exploitation took place in the context of organised prostitution. Updated NRM figures are published periodically<sup>6</sup>.

2.15 The majority of trafficked people involved in prostitution work indoors in private flats, saunas, massage parlours and brothels. Human trafficking is an offence under section 2 of the Act attracting a maximum sentence of life imprisonment<sup>7</sup>. The Act also includes a range of measures intended to provide support and protection to victims and potential victims of human trafficking.

2.16 Separate arrangements are in place to provide support and assistance to victims and potential victims of human trafficking, as required under both EU Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims and section 18 of the Act.

2.17 The Department of Justice funds the provision of support to potential adult victims of human trafficking during the recovery and reflection period of the NRM. Support is provided to meet the assessed needs of the individual and may include accommodation, material assistance, assistance in obtaining healthcare services, appropriate information, translation and interpretation services, assistance in obtaining legal advice or representation and assistance with repatriation.

2.18 DHSSPS provides appropriate support for adults who have been confirmed as victims of human trafficking through the NRM, subject to their leave to remain in Northern Ireland. Support and protection for child victims and potential victims of human trafficking is also the responsibility of Health and Social Care Trusts.

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<sup>6</sup> <http://www.nationalcrimeagency.gov.uk/publications/national-referral-mechanism-statistics>

<sup>7</sup> <http://www.legislation.gov.uk/nia/2015/2/contents/enacted>

2.19 Further advice and information on human trafficking can be obtained through NI Direct<sup>8</sup>. Where a person suspects that someone has been trafficked they should call PSNI on 999. If they wish to remain anonymous they can call Crimestoppers on 0800 555 111.

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<sup>8</sup> <http://www.nidirect.gov.uk/human-trafficking>

## 3. Legislation, Strategic Context and Key Facts

### (a) Legislation in Northern Ireland

- 3.1 Prostitution is not illegal in Northern Ireland but obtaining sexual services in exchange for payment is. Other activities associated with prostitution may also be illegal, including running a brothel, living off immoral earnings of a prostitute and abusing children through prostitution.
- 3.2 In Northern Ireland, women loitering to sell sex in public could be fined under the Belfast Improvement Act 1845. The Sexual Offences (NI) Order 2008 ('the Order') then made it illegal to:
- persistently 'kerb crawl' in a vehicle in order to buy sex from a person involved in prostitution; and
  - persistently 'solicit' or proposition a person in a street or other public place in order to buy sex.
- 3.3 The Policing and Crime Act 2009<sup>9</sup> removed the stipulation that the offences needed to be persistent to become an offence and amalgamated persistent soliciting and kerb crawling into one offence called 'soliciting'. This Act also made it illegal to buy sex from someone who has been subjected to force.
- 3.4 More recently, section 15 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 ('the Act'), which came into force on 1 June 2015, made it an offence for someone to obtain sexual services in exchange for payment<sup>10</sup>. Section 15 also repealed the offence of soliciting.

### (b) Strategic Context

- 3.5 The definition of prostitution and scope of this Strategy, as set out within Section 2, are wide ranging and the strategic context of existing supports and protections for those involved in prostitution therefore reflect this diverse environment of needs and expectations. Relevant strategies are listed within **Appendix 1**.
- 3.6 The strategic themes within this Appendix 1 are:
- International Human Rights Standards and Objectives – Treaties and obligations imposed by the UN and EU;

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<sup>9</sup> <http://www.legislation.gov.uk/ukpga/2009/26/introduction?view=extent>

<sup>10</sup> <http://www.legislation.gov.uk/nia/2015/2/contents/enacted>

- Health and Social Care – Substance misuse, mental health, domestic and sexual violence and social care;
- Justice – Victim support, trafficking, and reducing offending; and
- Safeguarding – Protection for vulnerable adults and children.

3.7 While the scope of the Strategy will exclude under 18's and those trafficked into prostitution, the protections for these groups afforded under other strategies are deemed worthy of inclusion within Appendix 1.

### **(c) Key Facts**

3.8 Due to the hidden nature of prostitution it is difficult to establish accurate numbers of people involved in prostitution in Northern Ireland. In order to fill some of the existing research gaps, a study of prostitution in Northern Ireland was commissioned by the Department of Justice and carried out by Queen's University Belfast. The study, called "Research into Prostitution in Northern Ireland"<sup>11</sup> (hereafter 'the DOJ/QUB Research'), was published in October 2014 and provides the most recent and thorough information on the demographics of people involved in prostitution in Northern Ireland.

3.9 Some of the key findings of the DOJ/QUB Research show that:

- people of all ages sell sexual services;
- almost half of the people involved in prostitution (48%) were below 30 years of age, with the largest group (23%) being in the 26-30 year old age bracket;
- more than half of people involved in prostitution (56%) are foreign nationals and many do not live in Northern Ireland;
- over three quarters of respondents logging on to the sex worker survey (78%) were female, 18% were male and 4% identified as transgender;
- three quarters of males involved in prostitution in the survey sample had started prostitution by age 21;
- many of the people who sell sexual services in Northern Ireland do not live here, they only visit for work;
- nearly three quarters of respondents to the survey (74%) had provided sex for money for the first time before they were 30 years of age;
- nearly one third of people involved in prostitution (32%) had children of their own;
- the majority of people involved in prostitution did not start selling sex when they were underage;

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<sup>11</sup> <http://www.dojni.gov.uk/index/publications/publication-categories/pubs-criminal-justice/prostitution-report-nov-update.pdf>

- under-age prostitution is not common, neither in the indoor nor in the outdoor sector; and
- over half of the people involved in prostitution (53%) had completed some trade, technical or vocational school or earned an undergraduate degree (Bachelors) or above.

3.10 Other points of interest from the DOJ/QUB Research help to build a picture of the nature and scale of prostitution in Northern Ireland, such as:

- the total number of women, men and transgender people involved in physical prostitution in Northern Ireland who are potentially contactable by those purchasing sexual services is between 300 and 350 on any given day;
- 25% of survey respondents indicated they did not want to exit prostitution and, therefore, did not require exit services. A further 34% indicated that they would need a job or professional qualifications paying the same expenses to encourage them to leave; and
- between 2010 and 2012, there were 14 convictions for controlling prostitution for gain, 20 convictions for brothel-keeping, and two for trafficking for the purpose of sexual exploitation (the same person may have been convicted for the same (or a different) offence on several accounts).

## 4. Purpose of the Strategy

### (a) Requirements under Section 19 of the Act

- 4.1 As noted above, the sole aim of the Strategy is to set out the actions to be taken by departments to develop a Programme of Assistance and Support ('PAS') for people who want to leave prostitution. Section 19 of the Act states that the PAS must be made available by 1 April 2016.
- 4.2 Other requirements in section 19 of the Act are that the provision of the PAS, in whatever form it takes:
- is not conditional on the person acting as a witness in any criminal proceedings;
  - is only with the agreement of that person;
  - is in a manner which takes due account of the needs of that person regarding safety and protection from harm; and
  - should be from someone of the same gender as the person receiving the assistance and support.

### (b) Programme of Assistance and Support

- 4.3 The purpose of this Strategy is to detail what the PAS will look like and how it will be taken forward. The PAS needs to be in place by 1 April 2016 and can take a range of forms, depending on several factors. The PAS is discussed in more detail in **Section 7**.
- 4.4 Section 19 of the Act requires that the Strategy and, therefore, the PAS are reviewed every three years. This will be taken forward by a governance group; the membership and role of this governance group is discussed in **Section 8**.



## 5. Barriers to Exiting Prostitution

5.1 A two-year research project, carried out by Eaves and London South Bank University to assess the effectiveness of different interventions designed to support women who want to leave prostitution<sup>12</sup>, established a number of barriers to exiting prostitution.

### (a) General barriers

5.2 **Substance misuse** – Some people enter prostitution to finance an addiction, while others may become addicted to substances after becoming involved in prostitution. Those wishing to exit prostitution may find it difficult to access drug or alcohol treatment and support which will address the complex interaction of addiction, prostitution and other underlying issues. Substance misuse is also found to be strongly linked with other barriers, such as mental and physical health problems, problems with accommodation and debt, and with involvement with the criminal justice system.

5.3 **Housing** – Homelessness and lack of access to affordable and safe housing acts as a barrier to leaving prostitution in several ways, for example:

- being compelled to seek accommodation with pimps or abusive partners in order to prevent homelessness;
- involvement in prostitution in order to pay the rent or mortgage;
- losing accommodation due to imprisonment; and
- problems with location resulting in feeling isolated and living away from support networks near other women involved in prostitution.

5.4 **Physical and/or mental health problems** – Common symptoms include depression and anxiety, Post Traumatic Stress Disorder, an inability to form trusting relationships due to childhood violence and patterns of dissociation with their involvement in prostitution, which prevents them from engaging with the idea of exiting as a result.

5.5 **Experiences of violence as children** – this includes emotional, physical, verbal and sexual violence and can compound the feelings of worthlessness associated with prostitution.

5.6 **Criminalisation** – criminalisation, through prostitution and non-prostitution-related offences, is a significant barrier in terms of both seeking help and exiting prostitution. It acts as a barrier to finding employment, disrupts their lives and families, and may create additional financial burdens and debt, as crimes involving prostitution are often dealt with by imposing fines.

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<sup>12</sup> <http://i1.cmsfiles.com/eaves/2012/11/Breaking-down-the-barriers-a37d80.pdf>

- 5.7 **Finance** – As many of those involved in prostitution do so for financial reasons, the potential lack of finance is a barrier that prevents them from exiting (e.g. when prostitution is used to finance an addiction, pay off debts, or maintain their current lifestyle).
- 5.8 **Coercion** – Being forced to remain in prostitution because of controlling behaviours from another person (e.g. a partner, pimp or relative) is a complex issue which acts as a barrier to exiting. Many relationships between people involved in prostitution and those coercing them are characterised by the indicators of domestic violence, such as physical, sexual, emotional or financial abuse, as a way to exert and maintain power and control over the person. Coercion may also be linked to drug use and accommodation problems.
- 5.9 **Lack of qualifications or training** – this is given both as a reason to enter prostitution and as a significant barrier to exiting. Access to education and training is therefore considered a crucial factor in successfully leaving prostitution in the longer term.
- 5.10 **Age of entry** – Those entering prostitution at a young age, either as the result of coercion, drug use or experiences of childhood violence, may be unable to remember life before prostitution and therefore experience difficulty in envisioning a life away from prostitution.
- 5.11 As well as these barriers, people from **BME groups or refugees** involved in prostitution can face particular problems in accessing support and gaining protection because of language difficulties, fears about their immigration status, lack of knowledge of health and other social care entitlements, financial pressure, fear of the police and violence.

## **(b) Overview**

- 5.12 Some people involved in prostitution will have faced more than one of the barriers listed above. Some of the barriers might be overcome with a relatively low level of assistance and support, while others may require more focused support or a dedicated exit plan, especially where multiple barriers are at work.
- 5.13 In Northern Ireland, the DOJ/QUB Research found that there was a lack of knowledge among people involved in prostitution about existing support services. This was considered to be due to the fact that the existing services were not advertised in locations used by people involved in prostitution, such as websites used by those involved in prostitution to advertise sexual services.

5.14 It is clear that those involved in prostitution are not a homogeneous group and the numerous barriers to exiting prostitution will require a PAS that is flexible enough to cater appropriately for the needs of all individuals.

## **6. Available Support**

6.1 It is important to realise that the needs of those wishing to exit prostitution could be complex and require the services of a range of providers in the statutory, voluntary and community sectors. While some voluntary and community groups may have a role in signposting to other agencies, others will have a significant role in assisting and supporting those involved in prostitution to exit. Strong relationships between all sectors will be key to helping those involved in prostitution overcome the barriers they face in leaving prostitution.

### **(a) Health**

6.2 People involved in prostitution can suffer a number of health problems, regardless of whether they work indoors or on the street, and can often have further concerns about accessing the appropriate health care services. In addition others involved in prostitution may have learning difficulties or mental health problems.

6.3 The range of health needs will vary from case to case, but it is likely that individuals may need to access the following services:

- GPs and Primary Care Services
- Social Services
- Dental and Oral Health
- Sexual Reproductive Health Clinics
- Genito-Urinary Medicene (GUM) clinics
- Sexual Health NI
- Alcohol and drugs

### **(b) Finance**

6.4 The DOJ/QUB Research identified the main reason given for entering and remaining in prostitution as financial. This included financing day to day living, financing education, paying off debts and financing drug and alcohol addiction.

6.5 People who intend to exit prostitution need to be aware of the benefits available to them and how to access those benefits. The Department for Social Development are committed to improving the uptake of benefits in Northern Ireland and have a plan in place to ensure that every individual and household across Northern Ireland is receiving all social security benefits to which they and their families are entitled.

6.6 Debt counselling is provided by a number of organisations in the voluntary and community sector.

## **(c) Housing**

- 6.7 For many people involved in prostitution, the reduced income due to exiting prostitution can have a detrimental impact on their ability to pay their mortgage or rent. In certain circumstances, the accommodation may be directly linked to the provision of sexual services and so exiting prostitution would inevitably lead to losing the accommodation.
- 6.8 In order to provide people with the best opportunity of successfully leaving and not returning to prostitution they may need access to housing services. This may include housing those wishing to leave prostitution:
- away from drug users, especially if this is a reason for the person being involved in prostitution;
  - away from areas where there are high levels of street prostitution or brothel prostitution; and
  - away from where they may be likely to meet former clients.

## **(d) Employment/Training**

- 6.9 Seven per cent of those who took part in the Queens University research said that they had taken up prostitution because they had no other way to earn a living. Others felt that they would not be able to earn the same amount of money by taking up full time employment. Those involved in prostitution that were known to the police for offences, such as drug use, were also concerned that employers may find out about their involvement in prostitution.
- 6.10 There are a number of ways that people can improve their skills and find a way into employment, including through Job Centres or Further and Higher Education. The Department for Employment and Learning's Employment Service provides services through a network of 35 offices across Northern Ireland. In all offices Employment Service staff are available to clients who call in seeking help to find employment. Employment Service staff will offer support on finding employment, including advice about the local labour market, creating CVs, completing application forms and interview techniques. Employment Service Advisers will also seek to identify barriers to employment and working with the individual, determine the best way to improve employability and find sustained employment. This can include identifying appropriate training through Employment Service programmes as well as Bridge to Employment or Skills and Industry Academies.

## **(e) Justice System**

- 6.11 While people involved in prostitution may become involved in the criminal justice system as a result of their generally chaotic lifestyle, for example through shoplifting or possession of drugs, prostitution is not in itself a crime.
- 6.12 The Inspire Women's Project centre provides a range of programmes tailored to meet the individual needs of female offenders, including those who may have also been involved in prostitution. The Inspire Women's Project has successfully developed this collaborative programme which links up with a range of other organisations such as the Lankelly Chase Foundation, the Women's Support Network and the Northern Ireland Association for Care and Rehabilitation of Offenders (NIACRO).
- 6.13 Extern Works offer vocational training and support services to adults who have experienced exclusion and are unable to access mainstream provision. This includes people who are homeless, people who have offended, people who are in prison, people recovering from mental ill health and people who have a learning difficulty.
- 6.14 The project operates at sites in Mallusk and at HMP Maghaberry and provides a broad range of vocational qualifications and personal development and lifeskills training to support people as they move to employment or enable them to stabilise and remain within the community.

## **(f) Domestic and Sexual Violence**

- 6.15 There are known links between prostitution and domestic violence<sup>13</sup>, where men and women control their partner and force them to engage in prostitution. It is now widely accepted and understood that domestic violence (i.e. violence or abuse inflicted by someone on a current or previous intimate partner or family member) does not have to be just physical and can cover any form of threatening, controlling or coercive behaviour. This can include psychological, verbal, sexual, financial or emotional abuse.
- 6.16 It has been noted that there is an increasing trend towards 'pimp/partner'<sup>14</sup> relationships; in these cases, the person involved as a prostitute may also be a victim of domestic violence and abuse and should receive appropriate protection and support.
- 6.17 Victims of domestic violence can access a number of facilities in Northern Ireland, including:

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<sup>13</sup> [http://www.hiddenhurt.co.uk/evie\\_domestic\\_violence\\_and\\_prostitution.html](http://www.hiddenhurt.co.uk/evie_domestic_violence_and_prostitution.html)

<sup>14</sup> [http://prostitution.procon.org/sourcefiles/paying\\_the\\_price.pdf](http://prostitution.procon.org/sourcefiles/paying_the_price.pdf)

- 24 Hour Domestic and Sexual Violence Helpline
- Women's Aid
- Men's Advisory Project
- Rainbow Project

6.18 Some of those involved in prostitution may also be victims of sexual violence. Such crimes may go unreported to the PSNI because of fear of the perpetrator, perceived attitudes or because the perpetrator is known to the victim. Those who have suffered sexual violence can get help and advice from:

- 24 Hour Domestic and Sexual Violence Helpline
- The Rowan Sexual Assault Referral Centre (SARC)

### **(g) Outreach and Drop-In Services**

6.19 Outreach and drop-in services are considered to be the most effective aids to helping those who wish to exit prostitution.

6.20 A number of organisations providing support, advice and help for those involved in prostitution across the UK have outreach/drop-in services. The range of services provided at drop in centres varies although many provide practical help including provision of condoms, and sexual health advice.

6.21 The Belfast Drop-in Service for Commercial Sex Workers at Bryson House provides specialist support for those involved in prostitution. The Service is staffed by an Advanced Nurse Practitioner and a Public Health Nurse and can help with a range of health protection and promotion needs, including sexual health. The Service provides drop-in support in a safe, confidential and non-judgemental location. Its services include sexual health advice, some testing and treatment of sexually transmitted infections and signposting to other services that may help anyone involved in prostitution.

### **(h) Counselling**

6.22 Counselling sessions offered may explore a variety of issues, including harm reduction, substance abuse, sexually transmitted diseases, HIV, family dynamics and personal issues. Further therapy may also be recommended for people with mental health issues or unresolved issues due to childhood abuse.

6.23 Counselling services available in Northern Ireland include:

- Nexus (sexual abuse)
- Lifeline (crisis response for people experiencing distress or despair)

## **7. Programme of Assistance and Support (PAS)**

### **(a) PAS Requirements**

- 7.1 As noted previously, section 19 of the Act requires that the Programme of Assistance and Support for people wanting to leave prostitution (PAS), in whatever form it takes, should:
- not be conditional on the person acting as a witness in any criminal proceedings;
  - only be provided with the agreement of that person;
  - be provided in a manner which takes due account of the needs of that person regarding safety and protection from harm; and
  - be offered by someone of the same gender as the person receiving the assistance and support.
- 7.2 Some of these requirements will only be relevant where an element of the PAS is the provision of face-to-face assistance or support.

### **(b) Initial PAS**

- 7.3 As set out above, the barriers to exiting prostitution are addressed through the provision of existing services provided by the state. It is therefore not proposed that such services should be replicated solely for the PAS.
- 7.4 However, as noted in earlier sections, people involved in prostitution can belong to marginalised or hard to reach groups; therefore the issue for them will be accessing the services provided by the state. On this basis, the core of the PAS will be connecting those wishing to leave prostitution with the services and support which will allow them to do so.
- 7.5 This work is being brought forward at a time of exceptional financial difficulty for the Executive, therefore it is proposed that we will utilise existing services, resources and people to achieve the goals of the PAS. Those most likely to encounter a person involved in prostitution include social workers, police officers, health care workers and others working in the community. Our focus will be on ensuring that these workers are able to provide the advice and support necessary to assist some who wishes to cease working as a prostitute.
- 7.6 The Strategy and the PAS will both be reviewed at least every three years and will be amended or expanded where appropriate. Should resources for new service development become available in the coming years and the Governance Group can establish a definite need and a suitable programme to



address that need, then a business case can be taken forward to secure these resources.

## **8. Governance and Evaluation**

### **(a) Governance**

- 8.1 Section 19 of the Act requires DHSSPS, along with other NI departments, to review the Strategy at least every three years and, where any revisions are required, publish the revised Strategy.
- 8.2 A Governance Group, chaired by DHSSPS, will be set up to take ownership of and review the Strategy and the Programme of Assistance and Support (PAS). The Governance Group will be made up of officials from those Northern Ireland departments that have most direct interest in support for people wanting to exit prostitution.
- 8.3 At this stage, it is envisaged that task-and-finish groups would be convened by the Governance Group to take forward specific actions when required. The membership of these task-and-finish groups could include suitable representatives from stakeholder groups and the voluntary and community sector. Ultimately, decisions on direction for and membership of task-and-finish groups will be made by the Governance Group.

### **(b) Evaluation**

- 8.4 The Strategy will be evaluated by the Governance Group in order to ensure that it is meeting the standards as set out in the Act and to assess the need for an amended or expanded PAS.
- 8.5 The evaluation will take place within three years of the Strategy being published.

# Appendix – Strategic Context

## (a) International Human Rights Standards and Obligations

1. The Northern Ireland Executive is subject to the obligations contained within the international human rights treaties that have been ratified by the United Kingdom. In this context, the relevant treaties include:
  - the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially women and children, supplementing the UN Convention Against Transnational Organised Crime<sup>15</sup>;
  - the UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)<sup>16</sup>;
  - the UN Convention on the Rights of the Child<sup>17</sup>;
  - the UN Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography<sup>18</sup>;
  - the Council of Europe Convention on Action against Trafficking in Human Beings<sup>19</sup>; and
  - the European Convention on Human Rights (ECHR), as incorporated into domestic law by the Human Rights Act 1998.
2. The UK Government is also a signatory to the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse<sup>20</sup>.

## (b) Health and social care

### Domestic and Sexual Violence – Tackling Violence at Home<sup>21</sup> and Tackling Sexual Violence and Abuse<sup>22</sup>

3. DHSSPS and DOJ have joint responsibility for addressing domestic and sexual violence in Northern Ireland. This is currently done through the existing domestic violence strategy *Tackling Violence at Home* and sexual violence strategy *Tackling Sexual Violence and Abuse*. An associated joint action plan is in place to protect, advise and support victims of domestic and sexual violence and bring perpetrators to justice.
4. Enforced prostitution either due to control of finances or as an act of control may be considered a form of domestic and sexual violence.

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<sup>15</sup> Ratified by the UK on 9 February 2006

<sup>16</sup> Ratified by the UK on 7 April 1986

<sup>17</sup> Ratified by the UK on 16 December 1991

<sup>18</sup> Ratified by the UK on 20 February 2009

<sup>19</sup> Ratified by the UK on 17 December 2008

<sup>20</sup> <http://conventions.coe.int/Treaty/Commun/QueVoulezVous.asp?CL=ENG&NT=201>

<sup>21</sup> [http://www.dhsspsni.gov.uk/tackling\\_violence\\_strategy.pdf](http://www.dhsspsni.gov.uk/tackling_violence_strategy.pdf)

<sup>22</sup> [http://www.dhsspsni.gov.uk/tackling\\_sexual\\_violence\\_and\\_abuse\\_strategy\\_.pdf](http://www.dhsspsni.gov.uk/tackling_sexual_violence_and_abuse_strategy_.pdf)

## **Making Life Better: A New Public Health Strategic Framework<sup>23</sup>**

5. A new ten year cross-cutting public health strategic framework *Making Life Better* was published by DHSSPS in June 2014. This provides direction for policies and actions to improve the health and wellbeing of the people of Northern Ireland and retains a focus on the broad range of social, economic and environmental factors which influence health and wellbeing. The framework adopts a thematic approach and aligns with other strategies and government policies to illustrate inter-relationships and promote collaboration to make the best use of available resources. Through strengthened co-ordination and partnership working in a whole system approach, *Making Life Better* seeks to create the conditions for individuals and communities to take greater control of their own lives and move towards a vision for Northern Ireland where “all people are enabled and supported in achieving their full health and wellbeing potential.”

## **New Strategic Direction (NSD) on Alcohol and Drugs 2011-2016<sup>24</sup>**

6. This cross-sectoral Strategy aims to reduce the harm related to both alcohol and drug misuse in Northern Ireland. This Strategy is based on the 2006 NSD and has been extended until 2016 which ensures a consistent approach over a ten-year period. Whilst resources continue to be directed at front-line services, programmes, and interventions, the Strategy also focuses on emerging issues. The NSD recognises the need to explore further links between alcohol and drug related issues and domestic and sexual violence and abuse.
7. In addition, the Strategy recognises that services may need to be targeted at specific at risk groups including sex workers.

## **Sexual Health Promotion – Strategy & Action Plan 2008-2013<sup>25</sup>**

8. This Strategy sets out Government’s vision for promoting positive sexual health. It aims to improve, protect and promote the sexual health and well-being of the whole population of Northern Ireland with a focus on prevention, training, education and access to services.
9. An associated addendum to the Sexual Health Promotion Strategy and Action Plan to December 2015 has been published<sup>26</sup>.

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<sup>23</sup> <http://www.dhsspsni.gov.uk/mlb-strategic-framework-2013-2023.pdf>

<sup>24</sup> DHSSPS NI (2011), Available at:  
[http://www.dhsspsni.gov.uk/new\\_strategic\\_direction\\_for\\_alcohol\\_and\\_drugs\\_phase\\_2\\_2011-2016](http://www.dhsspsni.gov.uk/new_strategic_direction_for_alcohol_and_drugs_phase_2_2011-2016)  
(Accessed: 29 January 2015)

<sup>25</sup> [http://www.dhsspsni.gov.uk/dhssps\\_sexual\\_health\\_plan\\_front\\_cvr.pdf](http://www.dhsspsni.gov.uk/dhssps_sexual_health_plan_front_cvr.pdf)

<sup>26</sup> <http://www.dhsspsni.gov.uk/sexual-health-plan-addendum.pdf>

## **Improving and Safeguarding Social Wellbeing – A Strategy for Social Work in Northern Ireland 2012-2022<sup>27</sup>**

10. This Strategy for Social Work in Northern Ireland sets out a vision and agenda for action for social work and social workers in improving and safeguarding the social wellbeing of individuals, families and communities. It provides a framework for social work practice that reflects the role of social work in early intervention and prevention as well as in more targeted and specialist services for those in need of care or protection. It will support practitioners, commissioners, Health and Social Care Trusts and other employers to strengthen and improve social work services for the future.

### **(c) Justice**

#### **Working Arrangements for the Welfare and Safeguarding of Child Victims of Human Trafficking<sup>28</sup>**

11. In February 2011, DHSSPS and the PSNI jointly issued guidance on the working arrangements for the welfare and safeguarding of children who are, or are suspected of having been, victims of Human Trafficking. The guidance establishes procedures for dealing with trafficked children and takes account of the requirements of the Council of Europe Convention on Action against Trafficking in Human Beings<sup>29</sup>, the United Nation Convention on the Rights of the Child (UNCRC), and the Children (Northern Ireland) Order 1995<sup>30</sup>.
12. The guidance advises practitioners to consider the legal status of the child and whether he/she requires the protection of the family court, child protection planning, and case management issues. The guidance also gives instruction in respect of the interface and liaison between social workers, the PSNI and legal representatives with the 'Competent Authority' and the UK Immigration and Visas in relation to child victims of human trafficking and asylum issues.
13. Guidance on Working Arrangements for the Welfare and Protection of Adult Victims of Human Trafficking<sup>31</sup> was developed jointly by DOJ and DHSSPS and launched in October 2012. The Guidance is primarily aimed at the PSNI and HSCTs and sets out working arrangements for the welfare and protection of adult victims of human trafficking.

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<sup>27</sup> <http://www.dhsspsni.gov.uk/swstrategy.pdf>

<sup>28</sup> [http://www.dhsspsni.gov.uk/oss\\_working\\_arrangements\\_for\\_the\\_welfare\\_safeguarding\\_of\\_child\\_victims\\_of\\_human\\_trafficking.pdf](http://www.dhsspsni.gov.uk/oss_working_arrangements_for_the_welfare_safeguarding_of_child_victims_of_human_trafficking.pdf)

<sup>29</sup> <http://conventions.coe.int/Treaty/Commun/QueVoulezVous.asp?NT=197&CM=1&CL=ENG>

<sup>30</sup> <http://www.legislation.gov.uk/nisi/1995/755/contents/made>

<sup>31</sup> <http://www.dojni.gov.uk/index/publications/publication-categories/pubs-policing-community-safety/working-arrangements-for-the-welfare-protection-of-adult-victims-of-human-trafficking-oct-2012.pdf>

14. HSCB have also developed a Pathway for Safeguarding and Promoting the Welfare of Separated/Unaccompanied Children arriving in Northern Ireland.

### **Reducing Offending<sup>32</sup>**

15. The Justice Minister published, on behalf of the Executive, a Strategic Framework for Reducing Offending in 2013. The Strategic Framework sets out the overarching coordinated approach across government and the justice system to reducing offending and building a safer society. It aims to both prevent offending and reduce reoffending through a focus on partnership working across justice, government, and with the wider voluntary, community and private sectors in order to tackle the issues associated with offending behaviour.

### **Women's Offending Behaviour in Northern Ireland: A Strategy to Manage Women Offenders and Those Vulnerable to Offending Behaviour<sup>33</sup>**

16. In October 2010 the Department of Justice (DoJ), in partnership with the Northern Ireland Prison Service (NIPS) and the Probation Board for Northern Ireland (PBNI), published *Women's Offending Behaviour in Northern Ireland: A Strategy to Manage Women Offenders and Those Vulnerable to Offending Behaviour*. The strategy aims to address the complex issues and vulnerabilities that can lead women to offend, or indeed reoffend, in Northern Ireland. It identifies a number of women involved in prostitution as a potentially vulnerable group that could benefit from supportive interventions, and commits to carrying out research in this area.

### **Reducing Offending Among Women 2013-2016<sup>34</sup>**

17. This is the second phase of the women offenders strategy, following on from the Women's Offending Behaviour in Northern Ireland strategy from 2010, and as such it remains directed at the vision statement set out in the original strategy. It takes account of the local, national and international rights and standards relating to women.
18. The Strategy aims to reduce offending among women through work both to prevent girls and women becoming involved in offending and to bring down reoffending among those who do. Most women who offend pose a low risk to

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<sup>32</sup> <http://www.dojni.gov.uk/index/publications/publication-categories/pubs-policing-community-safety/doj-strategic-framework.pdf>

<sup>33</sup> [http://www.dojni.gov.uk/index/publications/publication-categories/pubs-policing-community-safety/final\\_draft\\_for\\_print-a\\_strategy\\_to\\_manage\\_women\\_offenders\\_and\\_those\\_vulnerable\\_to\\_offending\\_behaviour.pdf](http://www.dojni.gov.uk/index/publications/publication-categories/pubs-policing-community-safety/final_draft_for_print-a_strategy_to_manage_women_offenders_and_those_vulnerable_to_offending_behaviour.pdf)

<sup>34</sup> <http://www.dojni.gov.uk/index/publications/publication-categories/pubs-policing-community-safety/community-safety/reducing-offending/reducing-offending-among-women-2013-2016.pdf>

society but often have a high level of need. However, there are some women who commit serious offences and for whom secure custody and/or more intensive supervision is required. The justice system will continue to detect and, appropriately and proportionately, sentence offenders. To achieve long-term success in reducing offending, it will work in partnership with government departments and agencies, and the voluntary and community sectors, to deliver interventions that address the complex issues underlying offending behaviour among women.

### **Victim and Witness Strategy<sup>35</sup>**

19. The Justice Minister published a new strategy for victims and witnesses in June 2013 - *'Making a difference to victims and witnesses of crime - Improving access to justice, services and support - a five-year Strategy'*. The aims of the strategy are to provide better quality services which respond to the needs of victims (and witnesses) and secure a more positive experience for all those who have contact with the criminal justice system. Improving access to justice and the experience of victims and witnesses of sexual violence and abuse, as well as victims of crime linked to prostitution, is vital in addressing both under-reporting of crime and responding to the needs of those engaging with the criminal justice system. As part of the strategy DOJ will be undertaking research into the experiences of those that have been a victim of sexual abuse or violence, as well as victims of domestic abuse or violence.

### **Victims Charter<sup>36</sup>**

20. A new Victim Charter was published in January 2015. The Charter sets out the standards of service and entitlements that a victim of crime should receive from the criminal justice system. It also sets out support services that are available where a person has not reported a crime to the police. Victims have the right to expect high quality services, tailored to their individual needs, in any interaction with criminal justice service providers. This includes being proactively provided with information about how a case is progressing and getting help and support as they move through the criminal justice system. The Charter also makes clear who victims can contact if they have a query, need more information or if they are not happy about how they have been treated.

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<sup>35</sup> <http://www.dojni.gov.uk/index/public-consultations/archive-consultations/making-a-difference-improving-access-to-justice-for-victims-and-witnesses-of-crime-a-five-year-strategy.pdf>

<sup>36</sup> <http://www.dojni.gov.uk/index/publications/publication-categories/pubs-criminal-justice/victims-charter.htm>

## **(d) Safeguarding**

### **Safeguarding Adults at Risk<sup>37</sup>**

21. The Northern Ireland Adult Safeguarding Partnership (NIASP) published a five year strategic plan (2013-18) in October 2013. The strategy represents the commitment of the partner organisations to work together to continually improve services to safeguard adults at risk. It sets out a vision of the shape and scope of adult safeguarding services in Northern Ireland over the five year period. The DHSSPS jointly with DOJ is currently developing an Adult Safeguarding Policy. A draft policy was issued for public consultation in November 2014.

### **Regional Adult Protection Policy and Procedural Guidance 2006<sup>38</sup>**

22. Published in September 2006, the purpose of the guidance is to ensure a co-ordinated and standardised approach by all those who work with vulnerable adults and to establish the principles of good practice in this important area of work. The policy and the procedures which flow from it are derived from best practice in Northern Ireland and with reference to developments elsewhere in the UK. The guidance is being reviewed and updated by the NIASP and will take account of the developing Government policy on adult safeguarding.

### **Safeguarding Children and Young People**

23. DHSSPS is in the process of revising the existing child protection guidance 'Co-operating to Safeguard Children', first produced in 2003. The revision is a Programme for Government commitment. While this is a DHSSPS-led exercise, child safeguarding is a cross-government activity as effective safeguarding requires interdepartmental, multi-agency and multi-disciplinary support. The revised Cooperating to Safeguard Children will address Child Sexual Exploitation as a form of Child Sexual Abuse which should always be responded to as a Child Protection issue. The revised Policy will emphasise that no child can truly consent to her/his own exploitation and that no child should be referred to as a 'prostitute'. The Policy will, however, recognise that children and young people can be sexually exploited and 'prostituted' by others for their own gain. This policy statement and guidance will be supplemented by operational child protection policies and procedures, which will include Child Sexual Exploitation. The ongoing development and review of policies and procedures for safeguarding and promoting the welfare of children, is a statutory responsibility of the Safeguarding Board for Northern Ireland (SBNI).

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<sup>37</sup> [http://www.hscbusiness.hscni.net/pdf/N\\_I\\_A\\_S\\_P\\_Strat\\_2013-18.pdf](http://www.hscbusiness.hscni.net/pdf/N_I_A_S_P_Strat_2013-18.pdf)

<sup>38</sup> <http://www.hscboard.hscni.net/publications/LegacyBoards/001%20Regional%20Adult%20Protection%20Policy%20and%20Procedural%20Guidance%202006%20-%20PDF%20249KB.pdf>



24. The aim of the SBNI Strategic Plan (2013-2016)<sup>39</sup> is to fulfil its responsibility to coordinate and ensure the effectiveness of what is done by each person or body represented on the Board for the purposes of safeguarding and promoting the welfare of children and young people. The strategic priorities include working with member agencies to develop a coordinated strategic approach to their activities and working model to protect and safeguard children who go missing from home and care and/or are at risk of sexual exploitation. A range of actions is planned by the SBNI to deliver on this strategic priority.
25. In addition, one of the key functions of the SBNI is to develop policies and procedures for safeguarding and protection of children. The HSCB published Regional '*Residential Child Care Policies*' which includes chapters on safeguarding, with a specific section on CSE. In May 2012, the guidance document '*Police Involvement in Residential Care Safeguarding of Children Missing from Home and Foster Care*'<sup>40</sup> was further revised by the HSCB.
26. The Department of Education also plans to undertake a review of its existing child protection guidance, 'Circular 1999/10 Pastoral Care in Schools: Child Protection'. Child safeguarding and protection is a cross-government activity and the Department will take account of developing policies to inform this review.

#### **A Gender Equality Strategy for Northern Ireland 2006-2016<sup>41</sup>**

27. The Strategy provides an overarching strategic policy framework within which departments, their agencies and other relevant statutory authorities will channel their existing actions and initiate new actions to achieve an agreed vision, guided by a set of principles and objectives aimed at tackling gender inequalities and promoting gender equality across Government's major policy areas for the benefit of both women and men generally. The Strategy has nine strategic objectives including to eliminate gender based violence in society, including the effective application of existing measures to reduce violence against young men within the overall context of efforts to reduce violence in society generally.

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<sup>39</sup><http://www.safeguardingni.org/sites/default/files/sites/default/files/imce/15.04.13%20SBNI%20Strategic%20Plan%20Version%201.0.pdf>

<sup>40</sup><http://www.safeguardingni.org/sites/default/files/sites/default/files/imce/Regional%20Guidance%20-%20Police%20Involvement.pdf>

<sup>41</sup><http://www.ofmdfmi.gov.uk/genderequalitystrategy2006-2016.pdf>



# **Consultation Response Questionnaire**

**‘Leaving Prostitution:  
a strategy for help and support’**

**September – October 2015**

## **Responding to the Questionnaire**

The Department of Health Social Services and Public Safety (DHSSPS) is seeking your views on the draft Strategy, 'Leaving Prostitution: a strategy for help and support'. Please use this questionnaire to tell us your views on the draft document.

The consultation runs from **11 September 2015** and the closing date for comments is **23 October 2015**. Responses received after this date **will not be considered** due to the tight legislative deadline.

Please send your response or any other queries you may have to:

**Address:** Department of Health, Social Services and Public Safety  
Integrated Projects Unit  
Room D2.17  
Castle Buildings  
Stormont Estate  
Belfast  
BT4 3SQ

**Email:** [gary.gregg@dhsspsni.gov.uk](mailto:gary.gregg@dhsspsni.gov.uk)

**Telephone:** 028 9052 2512

Please note that all responses will be treated as public and may be published on the DHSSPS websites. If you do not want your response to be used in this way, or if you would prefer for it to be used anonymously, please indicate this when responding (See Statement of Confidentiality and Access to Information Legislation below).

## **Confidentiality and Access to Information Legislation**

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with access to information legislation: these are chiefly the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004 (EIR).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice (section 45) with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the DHSSPS.

For further information about confidentiality of responses please contact the Information Commissioner's Office:

Address: Northern Ireland Information Commissioner's Office  
3rd Floor  
14 Cromac Place  
Belfast  
BT7 2JB  
Telephone: 028 9027 8757 or 0303 123 1114  
Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)  
Website: [www.ico.org.uk](http://www.ico.org.uk)

Please tick the box below if you want your response to be treated as anonymous. (NB: response details may still be shared under any future Freedom of Information requests.)

**I want my response to be treated as anonymous.**

Thank you for completing this questionnaire and providing input to this consultation.

## **About You**

I am responding ... (please tick appropriate option)

- as a member of the public
- on behalf of an organisation
- other \_\_\_\_\_ (please specify)

Please enter your details below:

<b>Name</b>	
<b>Job Title</b> <i>(if applicable)</i>	
<b>Organisation</b> <i>(if applicable)</i>	
<b>Address</b>	
<b>City/Town</b>	
<b>Postcode</b>	
<b>Email Address</b>	

## **Part 1 – Draft Strategy**

### **Question 1 – Scope**

**Do you agree with the scope of the Strategy as detailed in Section 2(b)?**

Yes

No      *(please tick one option only)*

If No, please explain why and let us know how you think this could be improved.

### **Question 2 – Barriers**

**Do you agree with the main barriers to exiting prostitution as described in Section 5 of the Strategy?**

Yes

No      *(please tick one option only)*

If No, please explain why and let us know how you think these could be improved.

### Question 3 – Existing Services

**In Section 6 of the Strategy, do you agree that the key existing services available for those wanting to exit prostitution have been identified?**

Yes

No *(please tick one option only)*

If No, please explain why and let us know how you think these could be improved.

### Question 4 – Programme of Assistance and Support (PAS)

**Do you agree with the proposal to deliver the Programme of Assistance and Support (PAS) as described in Section 7?**

Yes

No *(please tick one option only)*

If No, please explain why and let us know how you think this could be improved (within the confines of the severe restriction on resources).

## Question 5 – Governance

Are the proposals on future governance for the Strategy and the PAS, as described in Section 8, appropriate?

Yes

No      (*please tick one option only*)

If No, please explain why and let us know how you think these could be improved.



## **Part 2 – Equality Screening**

### **Introduction – Section 75 of the Northern Ireland Act 1998**

Section 75 of the Northern Ireland Act 1998 requires Departments to have due regard to the need to promote equality of opportunity between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation; between men and women generally; between persons with a disability and persons without; and between persons with dependants and persons without.

Departments are also required to have regard to the desirability of promoting good relations between persons of a different religious belief, political opinion or racial group.

### **Question 6 – Adverse Impact**

**Are the proposals set out in this consultation document likely to have an adverse impact on any of the nine equality groups identified under Section 75 of the NI Act 1998?**

- Yes
- No      *(please tick one option only)*

If Yes, please state the group or groups and let us know why you think they would be adversely affected and how this could be reduced or alleviated in the proposals.

### **Question 7 – Equality of Opportunity and Good Relations**

**Are you aware of any indication or evidence (qualitative or quantitative) that the proposals set out in this consultation document may have an adverse impact on equality of opportunity or on good relations?**

Yes

No *(please tick one option only)*

If Yes, please explain why and let us know what you think should be added or removed to alleviate the adverse impact.

### **Question 8 – Improved Equality of Opportunity and Good Relations**

**Is there an opportunity to better promote equality of opportunity or good relations?**

Yes

No *(please tick one option only)*

If Yes, please give details as to how.

## Question 9 – Human Rights

Are there any aspects of the policy where potential human rights violations may occur?

Yes

No *(please tick one option only)*

If Yes, please give details.

## Part 3 – Additional Comments

### Question 10 – Additional Comments

**Please use the space below to provide any additional comments you may have.**

It would be helpful if you reference which part of the document you are commenting on. If you refer to any other documents, please provide the title, author and if possible approximate date of publication.