



Department of  
**Justice**  
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## **A DEPARTMENT OF JUSTICE CONSULTATION**

### **DRAFT NORTHERN IRELAND HUMAN TRAFFICKING AND MODERN SLAVERY STRATEGY 2016/17**

1 July 2016

## RESPONDING TO THIS CONSULTATION

- i. An electronic version of this document is available in the consultation section of the Department of Justice website ([www.justice-ni.gov.uk](http://www.justice-ni.gov.uk)). Hard copies will be posted on request. Textphone contact details are provided below.
- ii. Copies in other formats, including Braille, large print, computer disk etc. may be made available on request. Please let us know if you need copies in an alternative language or format.
- iii. Responses should be emailed to [DOJSMHTConsultation.Mailbox@justice-ni.x.gsi.gov.uk](mailto:DOJSMHTConsultation.Mailbox@justice-ni.x.gsi.gov.uk) or posted to the following address:

Organised Crime Branch  
Protection and Organised Crime Division  
Department of Justice  
Room B4.20  
Castle Buildings  
Stormont Estate  
Belfast  
BT4 3SG  
**Telephone:** 028 90 528 625  
**Textphone:** 028 90 527 668

- iv. **The closing date for this consultation is 17:00 Friday 9 September 2016**
- v. The DOJ will publish a summary of responses following the completion of the consultation process. Unless individual respondents specifically indicate that they wish their response to be treated in confidence, their name and the nature of their response may be included in any published summary of responses. Respondents should also be aware that the DOJ's obligations under the Freedom of Information Act may require that any responses, not subject to specific exemptions in the Act, may be disclosed to other parties on request.

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## 1. INTRODUCTION

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### Background

1.1 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 section 1 and 2 of the Act (slavery, servitude and forced or compulsory labour and human trafficking).

1.2 The draft strategy attached at Annex A has been developed by the DOJ after extensive engagement with both civil society partners on the DOJ's Human Trafficking Engagement Group and statutory partners on the Organised Crime Task Force's (OCTF) Immigration and Human Trafficking Subgroup.

1.3 It builds on work that was progressed under the 2015/16 Human Trafficking and Exploitation Strategy and under earlier human trafficking action plans for Northern Ireland. Progress reports against previous action plans can be found at: <https://www.justice-ni.gov.uk/publications/northern-ireland-human-trafficking-action-plan-2013-to14-progress-report>; and

<https://www.justice-ni.gov.uk/sites/default/files/publications/doj/ni-human-trafficking-and-exploitation-action-plan-2014-16.pdf>

1.4 DOJ is in the process of completing a progress report against the 2015/16 strategy and this will also be published on the justice-ni.gov.uk website in due course.

### Purpose of strategy

1.5 In line with section 12 of the Act, the purpose of the draft strategy is to raise awareness of human trafficking and slavery-like offences in Northern Ireland and to contribute to a reduction in the number of such offences.

1.6 Section 12 of the Act also sets out that the strategy must, in particular, cover:

- the arrangements for co-operation between relevant organisations;

- provision as to the training and equipment for investigators, prosecutors and those dealing with victims; and
- provisions aimed at raising awareness of the rights and entitlements of victims.

1.7 We would particularly invite views on whether the draft strategy at Annex A meets the requirements of section 12 of the Act.

#### Strategic aim and priorities

1.8 The overarching strategic aim is consistent with the aim of the 2015-16 strategy:

“Equipping Northern Ireland to eradicate human trafficking and modern slavery whilst protecting and supporting victims.”

1.9 This aim is underpinned by four strategic priorities:

- Pursue (effective detection, disruption, investigation and prosecution of offenders);
- Protect and support (improved identification and the provision of effective protection and support);
- Prevent (prevent and reduce risk of human trafficking and modern slavery offences in Northern Ireland); and
- Partnership (effective, collaborative and joined-up partnership response).

1.10 These priorities are in turn supported by a number of key objectives and SMART actions which the DOJ and its partners have committed to delivering during 2016/17.

1.11 We invite comments on the appropriateness of the proposed strategic aim and priorities as well as on the proposed objectives and actions that have been identified.

### Consultation

1.12 Whilst we have already engaged with a wide range of key partners and stakeholders we want to ensure that other individuals and organisations are afforded an opportunity to comment on the draft in order to inform the final strategy. In particular we are keen to consult with other bodies, agencies or organisations whose functions or activities seek to tackle human trafficking or modern slavery offences or support the victims of these offences. Interested parties are invited to consider the draft strategy at Annex A and to complete and return the response questionnaire at Annex B by 17:00 Friday 9 September 2016.

### Next steps

1.13 Following consultation the DOJ will evaluate the responses received and (as necessary) produce a revised strategy to be shared with the Justice Committee. We hope that we will be in a position to publish the final strategy by the end of September 2016.

1.14 In order not to lose momentum, however, we intend to continue to work with our delivery partners towards implementation of the strategy whilst still in draft form, throughout the duration of the consultation period.

## **2. IMPACT ASSESSMENTS**

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### Equality Impact

2.1 As a public authority under Section 75 of the Northern Ireland Act 1998 the Department of Justice is required to have due regard to the need to promote equality of opportunity. This legislation also requires public authorities to identify whether a policy has a differential impact upon relevant groups; the nature and extent of that impact; and whether such an impact is justified. These obligations are designed to ensure that equality and good relations considerations are made central to government policy development.

2.2 We believe that the draft strategy would be beneficial and would have no adverse effect in Section 75 terms. It would reinforce Northern Ireland's defences against human trafficking and modern slavery offences. It will help to facilitate effective investigations and prosecutions as well as helping to ensure that victims are identified, protected and supported.

2.3 We do not therefore consider that an Equality Impact Assessment (EQIA) is required. Our screening form is available on the DOJ website.

2.4 Comments on our screening assessment and equality conclusions are welcome.

### Financial and public sector impact

2.5 We do not anticipate that any of the proposed actions in the draft strategy would have a significant cost impact. The draft strategy has been developed to coordinate efforts to make the best possible use of available resources. Any costs that may arise are likely to be absorbed by the Department of Justice and its statutory partners.

### **3. SUMMARY OF TARGETED CONSULTEES**

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3.1 This consultation has been made publicly available on the DOJ website. In addition, we have identified a number of key stakeholders who we believe will have a direct interest in the proposals set out in this paper and have invited their comments.

The list of key stakeholders is set out below:

- MLAs
- Northern Ireland MPs
- Northern Ireland MEPs
- Northern Ireland political parties
- Northern Ireland Government Departments
- Councils
- Health and Social Care Trusts
- Northern Ireland Courts and Tribunal Service
- Churches
- Civil society organisations
- DOJ Sex Worker Liaison Group
- Cultural organisations
- Equality Commission Northern Ireland
- Police Service of Northern Ireland
- Police Ombudsman
- Northern Ireland Policing Board
- Probation Board Northern Ireland
- Public Prosecution Service for Northern Ireland
- Criminal Justice Inspection Northern Ireland
- NIACRO
- Northern Ireland Audit Office
- Northern Ireland Human Rights Commission
- Northern Ireland Commissioner for Children and Young People
- Northern Ireland Prison Service
- Community groups
- Members of the OCTF Immigration and Human Trafficking subgroup
- Members of the Human Trafficking Engagement Group and other NGOs



- Joseph Rowntree Foundation
- Lord Chief Justice
- Independent Anti-Slavery Commissioner
- Attorney General
- Law Society
- Bar Council

#### **4. QUERIES OR CONCERNS**

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4.1 If you have any queries or concerns about the way in which the consultation has been handled please contact the DOJ Consultation Co-ordinator at the following address:

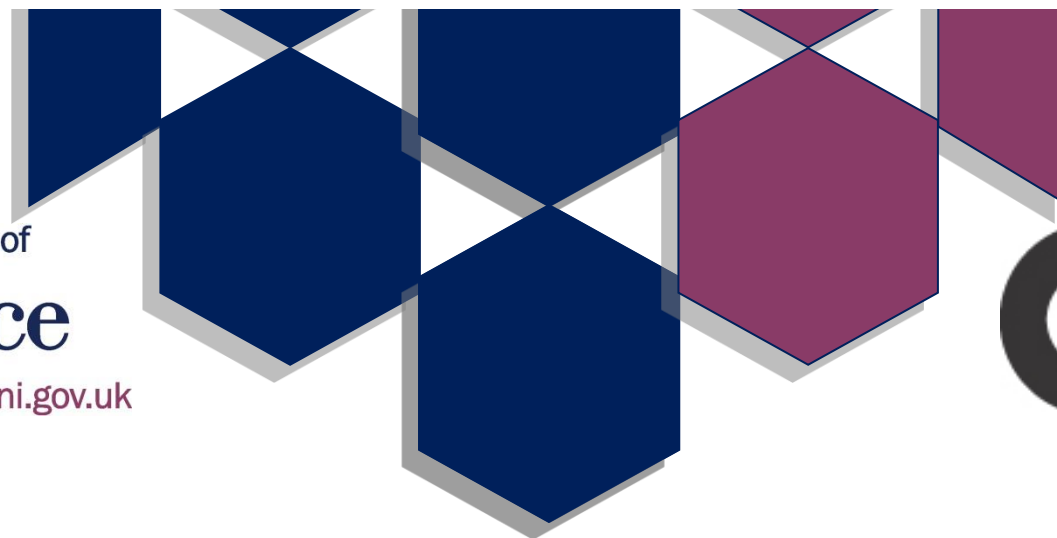
Corporate Secretariat  
Room 3.13B  
Castle Buildings  
Stormont Estate  
BELFAST  
BT4 3SG  
Tel: 02890 522611  
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**DRAFT NORTHERN IRELAND HUMAN TRAFFICKING  
AND MODERN SLAVERY STRATEGY 2016/17**



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**ORGANISED  
CRIME  
TASK FORCE**

**1. MINISTERIAL FOREWORD**

*[to be inserted once strategy is finalised]*

## 2. INTRODUCTION

This strategy has been developed by the Department of Justice (DOJ) in collaboration with civil society and statutory partners through the Organised Crime Task Force (OCTF) and its subgroups.

Section 12 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 (“the 2015 Act”) places a requirement on the Department of Justice (DOJ) to produce an annual strategy on offences under section 1 and 2 of the Act (slavery, servitude and forced or compulsory labour and human trafficking). The purpose of the strategy is to raise awareness of human trafficking and modern slavery offences and to contribute to a reduction in the number of such offences. In doing so it also seeks to improve victim identification and recovery and to ensure that appropriate protection and support measures are in place for victims to access.

Section 12 of the 2015 Act says that the strategy must also:

- set out the arrangements for co-operation between relevant organisations (both statutory and non-statutory);
- include provision as to training and equipment for investigators, prosecutors and those dealing with victims; and

- include provisions aimed at raising awareness of the rights and entitlements of victims.

The development of the strategy has been informed by:

- consultation with relevant organisations that are actively involved in tackling human trafficking and modern slavery in Northern Ireland;
- statutory measures and requirements under the 2015 Act and the Modern Slavery Act 2015;
- ongoing engagement on national priorities and common issues with other United Kingdom jurisdictions and with the Irish Government;
- the EU Strategy towards the Eradication of Trafficking in Human Beings 2012-2016; and
- information available through the National Referral Mechanism and the National Crime Agency’s strategic assessments of the nature and scale of human trafficking in the United Kingdom<sup>1</sup>.

The overarching strategic aim is: *“Equipping Northern Ireland to eradicate human trafficking and modern slavery whilst protecting and supporting victims”*.

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<sup>1</sup> <http://www.nationalcrimeagency.gov.uk/>

The strategy is structured around four Strategic Priorities which are:

1. **Pursue** (Effective detection, disruption, investigation and prosecution of offenders);
2. **Protect and Support** (Improved identification of victims and the provision of effective protection and support);
3. **Prevent** (Prevent and reduce the risk of modern slavery offences in Northern Ireland); and
4. **Partnership** (Effective, collaborative and joined-up partnership response).

These priorities are underpinned by strategic objectives and SMART actions which set out the work that, collectively, the DOJ and its partners are committed to delivering during 2016/17.

### 3. **BACKGROUND**

#### *Scale of modern slavery in Northern Ireland*

Human trafficking and slavery, servitude and forced or compulsory labour (“modern slavery offences”) are largely hidden crimes, which often make it difficult to establish an accurate assessment of the nature and extent of the problem in Northern Ireland. The National Referral Mechanism (NRM) currently helps to inform much of our understanding of the nature and scale of human trafficking and modern slavery across the United Kingdom. However it is widely accepted that the NRM only reveals part of the picture particularly since, in the case of adults, the individual must consent to a referral being made.

The National Crime Agency (NCA) also publishes an annual strategic assessment of modern slavery, which is informed by additional data sources, other than the NRM. In addition, new legislation in each of the United Kingdom jurisdictions has made provision for a new statutory duty on specified public authorities to report suspected cases of human trafficking and modern slavery. This duty is intended to provide greater insight into the nature and scale of trafficking and modern slavery and will allow information to be captured anonymously, even where an individual does not consent to a referral into the NRM. In Northern

Ireland this duty to report suspected cases is expected to come into effect before the end of 2016.

During 2015/16 the PSNI Human Trafficking Unit (HTU) conducted 252 screening assessments in respect of suspected cases of human trafficking or modern slavery. A total of 59 potential victims of human trafficking were referred to the NRM from Northern Ireland. This is an increase when compared to the 46 potential victims recorded for the financial year 2014/2015.

PSNI operational response

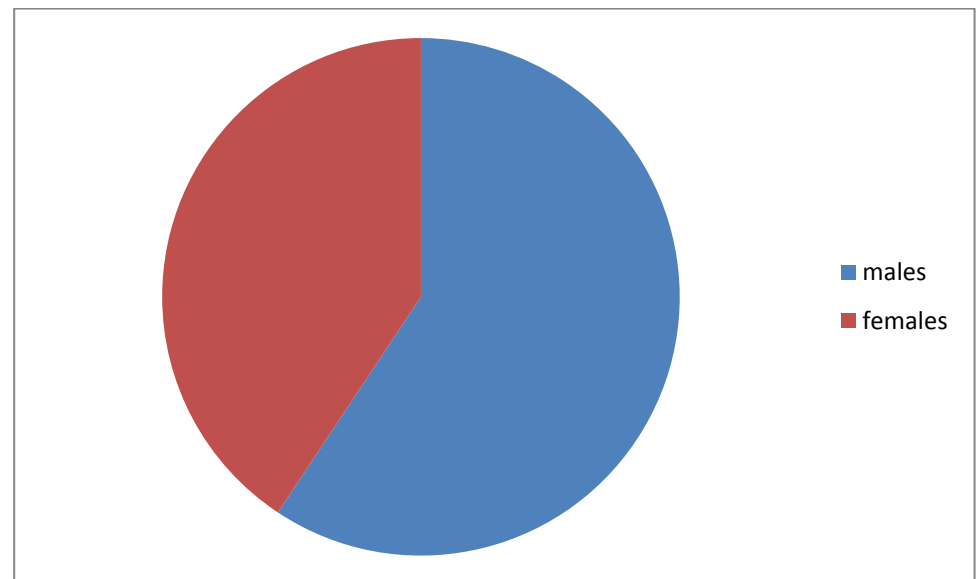
During 2015/16 financial year the HTU made 20 arrests. 12 of those arrests were for Human trafficking offences. The remaining eight arrests included offences of brothel keeping, firearms possession and drugs possession which were detected during human trafficking investigations.

A total of 41 searches were conducted during the 2015/16 financial year by the HTU. Six persons have been charged with a variety of offences, two of which were for human trafficking offences. Eight persons were reported to the Public Prosecution Service for Northern Ireland (PPS) for human trafficking-related offences.

Victimology

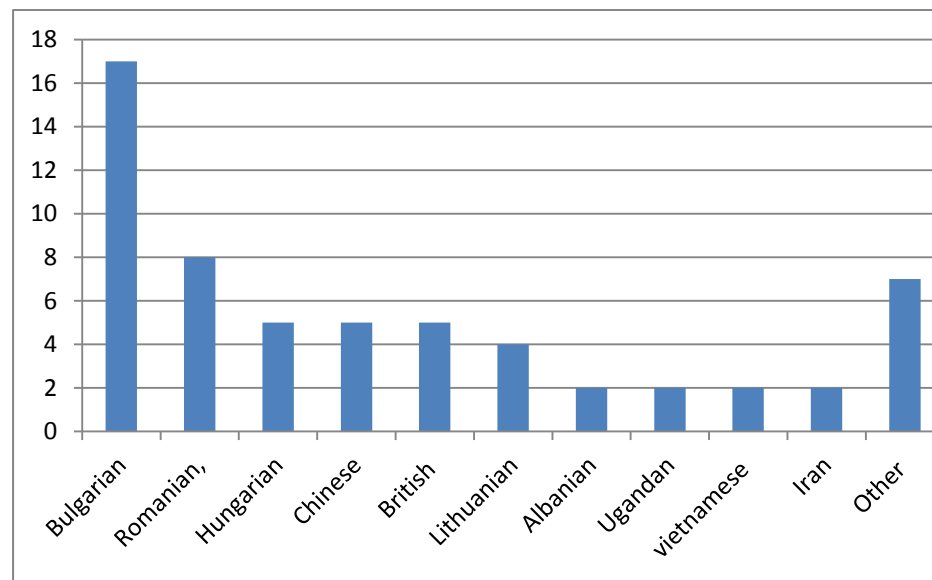
The 59 potential victims referred into the NRM included 35 males and 24 females. 11 of the individuals referred were children. 34 of the individuals were believed to be victims of forced and compulsory labour exploitation. The remaining 25 cases involved a variety of exploitation types, including sexual exploitation and 'securing services' exploitation.

**Graph A** shows the breakdown of male and female referrals during 2015/16



**Graph A**

**Graph B** shows numbers and the country of origin of potential victims who were referred to the NRM from Northern Ireland during 2015 and 2016.



**Graph B**

It is worth emphasising that potential victims are not always foreign nationals and indeed the United Kingdom and Ireland feature amongst the most common countries of origin of potential victims.

The legislative framework

2015 saw the introduction of new legislation in Northern Ireland which has introduced significant reforms and reinforced both how victims are protected and supported as well as law enforcement’s response to perpetrators. The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 (“the 2015 Act”) was granted Royal Assent on 13 January 2015. This legislation has enhanced our capacity to tackle human trafficking and slavery or forced labour in Northern Ireland by:

- establishing new offences of human trafficking and slavery, servitude and forced or compulsory labour;
- increasing the maximum sentence for human trafficking and slavery, servitude and forced or compulsory labour to life imprisonment;
- introducing a minimum two year sentence for these offences (unless there are exceptional circumstances to warrant a lower sentence);
- making it easier to confiscate the assets of exploiters and to force them to pay reparation to victims;
- criminalising the purchase of sexual services;
- introducing a new offence of forced marriage;
- introducing slavery and trafficking prevention orders;



- placing a statutory requirement on the Department of Justice to provide assistance and support to adult potential victims who are referred to the NRM;
- creating a new statutory defence for victims who have been compelled to commit certain other offences;
- creating new protections for victims within the criminal justice system in respect of avoiding secondary victimisation in police interviews and ensuring access to special measures in court and;
- introducing independent child guardians for trafficked and separated children.

With the consent of the Northern Ireland Assembly, a number of provisions in the Westminster Modern Slavery Act 2015 relating to enforcement powers in relation to ships, the Independent Anti-slavery Commissioner, and transparency in supply chains also extend to Northern Ireland. Again, this strategy includes a number of actions to ensure the full implementation of these provisions.

#### Identifying and supporting victims

The NRM continues to be the United Kingdom's framework for identifying victims of human trafficking and ensuring they receive the appropriate protection and support. First Responders are responsible for

referring potential victims to the NRM (as noted, adults need to give their consent to a referral being made on their behalf). Once referred into the NRM cases are assessed by one of the United Kingdom's Competent Authorities, whilst individuals are able to access a range of support services, including safe accommodation; one-to-one support; help with living / travel costs; help to access healthcare; sign-posting to immigration advice; sign-posting to independent legal advice and advice on compensation; help to access counselling or other therapeutic services; and interpreter / translation services.

The Department of Justice (DOJ) currently funds Migrant Help to provide this support to adult male potential victims of human trafficking and Women's Aid to support adult female potential victims of human trafficking, in accordance with the statutory obligations placed on the Department by section 18 of the Act. Support and protection for child victims and potential is provided by the Health and Social Care Trusts.

The 2014 review of the NRM made a number of recommendations for reforms which are aimed at improving the decision-making process in respect of cases and enhancing the overall effectiveness of the NRM in terms of outcomes for victims. A number of pilot projects are currently ongoing in England. DOJ and its partners in Northern Ireland wish to be

informed by the emerging lessons from these pilots and will need to work closely with counterparts in other jurisdictions to identify best practice and ensure that the NRM arrangements in Northern Ireland will effectively identify and support victims of trafficking and modern slavery. Supporting and protecting victims is a strategic priority and this strategy reflects the work that we plan to take forward in Northern Ireland in respect of implementing NRM reforms.

As a further reform of provision under the NRM, in March 2016 the former Minister of Justice announced the decision to extend the scope of the NRM in Northern Ireland to all victims of modern slavery, not just in those cases where there is an element of trafficking. This will ensure parity of treatment, support and protection to those who are vulnerable and exploited. The strategy reflects the ongoing work necessary to fully implement this important reform.

#### *Progress through partnership*

Partnership is one of the four strategic priorities under this strategy and it seeks to build on and develop the strong partnerships that are already in place between relevant Executive Departments, statutory agencies and non-governmental and civil society organisations.

Key progress has been made through effective partnerships during 2015/16. This includes:

- provision of awareness training to staff in statutory agencies, including training for new PSNI and Prison Officer recruits;
- development of an MoU between the United Kingdom's Gangmasters Licensing Authority and the Irish Workplace Relations Commission, which will boost cross border protection for workers in Ireland;
- delivery of ongoing support for adult potential victims of trafficking by Migrant Help and Women's Aid;
- delivery of extensive awareness raising activities, to schools, local church groups, private business and awareness information distributed at main public events;
- delivery of seminars to private sector representatives on the topic of labour exploitation and slavery;
- delivery of awareness raising material and engagement with sex workers and sex worker representatives, aimed at reducing risk and identifying victims within the sex industry.

**DRAFT NORTHERN IRELAND HUMAN TRAFFICKING AND MODERN SLAVERY STRATEGY 2016/17**

**STRATEGIC AIM: *Equipping Northern Ireland to eradicate human trafficking and modern slavery whilst protecting and supporting victims***

**STRATEGIC PRIORITY 1: PURSUE**

***Effective detection, disruption, investigation and prosecution of offenders***

**Objectives:**

1. Effective investigations and prosecutions
2. Improved understanding of human trafficking and exploitation
3. Effective training for law enforcement and prosecutors

**STRATEGIC PRIORITY 2: PROTECT AND SUPPORT**

***Improved identification of victims and the provision of effective protection and support***

**Objectives:**

1. Improved victim identification
2. Protection and support services for victims and potential victims
3. Champion the rights and entitlements of victims and potential victims

**STRATEGIC PRIORITY 3: PREVENT**

***Prevent and reduce the risk of human trafficking and modern slavery offences in Northern Ireland***

**Objectives:**

1. Engagement with perceived “at-risk” groups to reduce risk
2. Raise awareness, to increase reporting and to reduce demand
3. Evaluate effectiveness and capture best practice

**STRATEGIC PRIORITY 4: PARTNERSHIP**

***Effective, collaborative and joined-up partnership response***

**Objectives:**

1. Co-operation across Government and statutory agencies
2. Co-operation between Government and civil society
3. Effective cross-border co-operation
4. Engagement with the Anti-slavery Commissioner

<b>STRATEGIC PRIORITY 1: PURSUE</b> <i>Effective detection, disruption, investigation and prosecution of offenders</i>		<b>Projected outcomes:</b> <ul style="list-style-type: none"> <li>- Effective recovery of victims</li> <li>- Organised crime groups disrupted</li> <li>- Traffickers and exploiters prosecuted</li> <li>- Risk to public reduced</li> </ul>
<b>Objective 1:</b> Effective investigations and prosecutions		
<b>Action</b>	<b>Owner</b>	<b>Target date</b>
Law enforcement co-operation on joint operations, where appropriate	PSNI / Border Force/ HMRC	Ongoing
Continued co-operation with the NCA and other UK police forces and AGS to tackle cross-border and national trafficking and exploitation	PSNI	Ongoing
Implementation of Joint Investigation Teams with other EU member states, where appropriate	PSNI	Ongoing
Effective use of STPOs by police and courts to reduce the risk posed by offenders	PSNI / courts	Ongoing
Implementation of “maritime powers” provisions in the Modern Slavery Act 2015	DOJ	June 2016
PPS to continue to provide prosecutorial advice to PSNI and to facilitate early engagement with PSNI to improve effectiveness of investigations and prosecutions	PPS	Ongoing
PPS to continue to apply for restraint and confiscation of criminal assets in appropriate cases	PPS	Ongoing
Continue to work with other UK prosecuting authorities to fulfil the Prosecutor Commitments <sup>2</sup> that were agreed and signed in February 2016	PPS	Ongoing

<sup>2</sup> A copy of the Prosecutor Commitments is attached for information at Appendix 1

<b>Objective 2:</b> Improved understanding of human trafficking and modern slavery		
<b>Action</b>	<b>Owner</b>	<b>Target date</b>
Development of up-to-date problem profile	PSNI analyst	September 2016
Provide an annual profile on all separated / trafficked children referred to HSC Trusts	HSCB	March 2016 onwards
Development of cyber capabilities to assist in the identification and scale of human trafficking	PSNI / QUB	November 2016 for beta version launch
Effective use of Europol for information sharing to increase understanding of human trafficking activity across the EU	PSNI	Ongoing
Development of MOUs with partner agencies to improve information sharing	PSNI / Border Force / HMRC	Ongoing
Implementation of “duty to notify” provisions under s 13 of Human Trafficking and Exploitation (etc) Act 2015	DOJ	December 2016
Monitor relevant data sources including NRM statistics	DOJ	Ongoing
To work with other UK prosecuting authorities to learn lessons, exchange good practice and share relevant information and contacts	PPS	Ongoing

<b>Objective 3:</b> Effective training for law enforcement and prosecutors		
<b>Action</b>	<b>Owner</b>	<b>Target date</b>
Dedicated PSNI training/workshop from PPS in relation to 2015 Human Trafficking and Exploitation Act and to review any lessons learned from cases prosecuted across the UK	PPS	September 2016
Dedicated PSNI supervisors to receive appropriate internal training and national human trafficking training through the College of Policing	PSNI	March 2017
Dedicated PSNI to receive cross-border training with AGS, when appropriate	PSNI	Ongoing
Human trafficking training to be delivered to new PSNI recruits; new-to-role	PSNI	Ongoing

Detectives; and dedicated call handling staff		
Immigration Enforcement staff to undertake mandatory training on identifying and responding to cases of human trafficking and modern slavery	UK Immigration Enforcement	March 2017

<b>STRATEGIC PRIORITY 2: PROTECT AND SUPPORT</b> <i>Improved identification of victims and the provision of effective protection and support</i>	<b>Projected outcomes:</b> <ul style="list-style-type: none"> <li>- Effective identification and recovery of victims</li> <li>- Victims have access to appropriate support</li> <li>- Improved victim confidence in the justice system</li> <li>- Increased potential for prosecutions</li> <li>- Improved outcomes for victims</li> </ul>
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**Objective 1:**  
Improved victim identification

Action	Owner	Target date
Development of effective NRM arrangements for Northern Ireland	DOJ / DHSSPS / HSCB / PSNI	December 2016
Provision of effective guidance for First Responders [and panels] in Northern Ireland (subject to outcome NRM pilots)	DOJ	December 2016
Development of statutory guidance on identifying victims of human trafficking and modern slavery	DOJ	December 2016
Continuous learning from emerging cases	DOJ / HSCB / PSNI	Ongoing
Roll out of new Modern Slavery Helpline	Home Office / DOJ	September 2016 (TBC)
Launch of local telephone support helpline	Invisible Traffick	Autumn 2016

**Objective 2:**  
Protection and support services for victims and potential victims

Action	Owner	Target date
Extend scope of the NRM in Northern Ireland to all victims of modern slavery	DOJ	July 2016
Provision of support services for adult potential victims during the NRM's recovery and reflection period under DOJ's contracts with Migrant Help and B & L Women's Aid	DOJ / B&L Women's Aid / Migrant Help	Ongoing
Engagement with adult victims exiting support services to learn from their	B&L Women's Aid / Migrant Help	Pilot questionnaire by October 2016

experiences and identify best practice		
Evaluation of DOJ-funded support services	DOJ	April 2016
A business case will be undertaken to evaluate the options either to extend or tender for a new contract (subject to the outcome of service evaluation)	DOJ	TBC
Application of Trafficking Survivor Care Standards, with the agreement of the contracted service providers, across child and adult services as appropriate	DOJ / HSCB	Ongoing
Provision of tailored long term support for non-NRM adults, including information gathering and encouraging engagement to the NRM process.	Flourish NI	Ongoing
Delivery of intervention and support services to child victims and potential victims to fulfil obligations under the relevant domestic and international law e.g., Children (Northern Ireland) Order 1995 and UNHRC	HSCB	Ongoing
Procurement and establishment of Independent Guardian service in line with DHSSPS regulations and guidance on Independent Guardians	HSCB	Date to be agreed, subject to agreement being reached on regulations and guidance for the Independent Guardian Service
Revision of regional guidance on Working Arrangements for the welfare and safeguarding of child victims and potential victims of human trafficking	DHSSPS / HSCB / PSNI / DOJ	July 2016
Revision of regional guidance on Working Arrangements for the welfare and safeguarding of adult victims and potential victims of human trafficking	DOJ / DHSSPS / PSNI	August 2016
Establish clear protocols and pathways for child victims who reach 18 and transition between children's and adults' services	HSCB / DOJ	June 2016
Establish clear working arrangements in relation to adult victims who are parents with children in their care who may be vulnerable	HSCB / DOJ	July 2016
Advise and represent children and young people who are identified as potential victims of trafficking in Northern Ireland through the Children and Young People's Project	Law Centre NI	Ongoing
Advice and representation to victims of labour exploitation, including forced labour	Law Centre NI	Ongoing
Childline and NSPCC 24 hour helpline will continue as a source of help, advice or support to potential child victims of trafficking, carers or the general public. Professionals directed to Child Trafficking Advice Centre (CTAC)	NSPCC through CTAC	Ongoing



CTAC free service for professionals in Northern Ireland. UK multi-disciplinary service providing social work advice and NCA and UK Immigration Enforcement assistance. Provides training, data-sharing and expert witness court reports for children who have been trafficked.	NSPCC through CTAC	Ongoing
CTAC advice and assistance to professionals with concerns for children who have been trafficked across borders; children who are separated from their carer; those with unrelated adults; and children with parents who have been trafficked and there are risks to the child.	NSPCC through CTAC	Ongoing

<b>Objective 3:</b> Champion the rights and entitlements of victims and potential victims		
<b>Action</b>	<b>Owner</b>	<b>Target date</b>
Discretionary leave arrangements in place for victims who are assisting with criminal justice proceedings or where personal circumstances warrant it	Home Office	Ongoing
Effective use of “Discretionary leave to remain” applications, where appropriate	PSNI	Ongoing
Measures in place to avoid secondary victimisation	PSNI	Ongoing
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 specific assistance is needed to enable them to participate in criminal proceedings to give their best evidence	PPS / PSNI / NSPCC Young Witness Service	Ongoing
Implementation of a Repatriation Risk Assessment for each PVoT returning to their country of origin	PSNI	Ongoing
Ongoing work to identify and build network of NGO contacts in countries of repatriation	Migrant Help / Commissioner’s office	Ongoing
Information, guidance and support signposted through DOJ-funded support services to potential victim	DOJ	Ongoing
Legal aid available to victims of trafficking and slavery, as necessary	DOJ	Ongoing
Represent the needs of victims, as appropriate, with service providers (eg.	DOJ / OCTF and Engagement Group	Ongoing, as necessary

Banks etc)	partners	
Development of briefing papers and recommendations on labour exploitation, including a paper on legal remedies in instances of labour exploitation and forced labour.	Law Centre NI	December 2016
Tailored long term support for both post and non-NRM adult survivors. Case-workers assigned to assist with all aspects of daily life; promoting independence and reducing the risk of further exploitation.	Flourish NI	Ongoing
Provision of support for child victims at Immigration Tribunal Hearings	NSPCC through Young Witness Service	Ongoing

<b>STRATEGIC PRIORITY 3: PREVENT</b> <i>Prevent and reduce the risk of human trafficking and modern slavery offences in Northern Ireland</i>		<b>Projected outcomes:</b> <ul style="list-style-type: none"> <li>- Reduced risk of people being trafficked or exploited within Northern Ireland</li> <li>- Increased public awareness and reporting</li> <li>- Reduced demand for services of trafficked and exploited victims</li> </ul>
<b>Objective 1:</b> Engagement with perceived “at-risk” groups to reduce risk		
<b>Action</b>	<b>Owner</b>	<b>Target date</b>
Engagement with migrant workers to raise awareness and migrant worker rights	Freedom Acts (with input from DEL/DOJ as required)	Ongoing Workshop April 2016
Engagement with sex workers to raise awareness of risks and signs and indicators	DOJ / PSNI / Sex Worker Liaison Group	Ongoing
Awareness sessions in schools (assemblies, SU groups, etc...) by STOP THE TRAFFIK groups (complementing Freedom Acts materials)	No More Traffik	Ongoing

<b>Objective 2:</b> Raise awareness, to increase reporting and to reduce demand		
<b>Action</b>	<b>Owner</b>	<b>Target date</b>
Public awareness campaign to mark EU Anti-slavery Day	DOJ and partners	October 2016
Targeted programme of awareness to front-line professionals and key sectors	DOJ / Engagement Group	Ongoing
Awareness outreach at public events (e.g. Balmoral Show, Mela etc)	DOJ	Ongoing
Co-ordination of training / awareness-raising currently available through NGO sector to ensure consistent approach with Trust Training Teams to address health and social work staff	DOJ / HSCB / NGOs / HSC Trusts / Regional Trainers	September 2016
Development and distribution of information / awareness resources	DOJ / Engagement Group	Ongoing

STOP THE TRAFFIK groups to host and participate in community awareness sessions	No More Traffik	Ongoing
Mainstream awareness events several times per year to mark key moments and raise awareness of related issues	No More Traffik	Ongoing
Promotion of 'STOP app' encouraging communities to spot the signs and report suspicions	No More Traffik	Ongoing
Use of UN GIFT Box to raise awareness in less-reached communities	No More Traffik	Ongoing
Educate, inform and raise awareness through presentations to an audience of wide range of socio-economic groups and opinion formers	Invisible Traffik	Ongoing
Educate Key Stage 1 and 2 children using the Visi's World education resource pack	Invisible Traffik	Ongoing
Delivery of training and education on human trafficking and modern slavery to schools, youth groups, PCSPSs, faith groups, etc., in line with Freedom Acts' education plan 2015-18	Freedom Acts	Ongoing

<b>Objective 3:</b> Evaluate effectiveness and capture best practice		
<b>Action</b>	<b>Owner</b>	<b>Target date</b>
Baseline public awareness through Omnibus Crime Survey (subject to resources)	DOJ	December 2016
Public engagement and survey to assess and raise awareness of human trafficking and modern slavery	Soroptimist International / DOJ	October 2016
Develop resource library	DOJ	September 2016

<b>STRATEGIC PRIORITY 4: PARTNERSHIP</b> <i>Effective, collaborative and joined-up partnership response</i>	<b>Projected outcomes:</b> <ul style="list-style-type: none"> <li>- Improved victim identification</li> <li>- Consistent response across UK jurisdictions</li> <li>- Effective use of limited resources</li> <li>- Informed, effective policies</li> </ul>
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<b>Objective 1:</b> Co-operation across Government and statutory agencies
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Action	Owner	Target date
Effective co-ordination through regular meetings of the OCTF Immigration and Human Trafficking Subgroup	PSNI / DOJ	3 per year
Effective co-ordination on issues relating to children through the Regional Practice Network	HSCB	Ongoing
Development of effective links with local government	DOJ / councils	Ongoing
Participation in Inter Departmental Ministerial Group on Modern Slavery	DOJ	Ongoing
Effective co-ordination with Scottish, Welsh and Westminster Governments	DOJ	Ongoing
Participation in national working group on Anti-slavery Training standards	DOJ	Ongoing
Alignment with the UK NRM arrangements	DOJ / PSNI / DHSSPS /HSCB	Ongoing

<b>Objective 2:</b> Co-operation between Government and civil society
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Action	Owner	Target date
Ongoing co-operation through the DOJ Human Trafficking Engagement Group	DOJ / PSNI / E Group	3 per year
Ongoing co-operation through the DOJ Sex Worker Liaison Group, focusing on human trafficking	DOJ / PSNI / SWLG	3 per year
Development of protocol between NGOs and PSNI in respect of victims of human trafficking and modern slavery	PSNI	Ongoing

<b>Objective 3:</b> Effective cross-border co-operation		
<b>Action</b>	<b>Owner</b>	<b>Target date</b>
Co-host cross-border forum on modern slavery	DOJ / DOJE	June 2016
Biennial analysis of victim referrals in Ireland and Northern Ireland	DOJ / DOJE	March 2017
Ongoing AGS representation on OCTF Immigration and Human Trafficking subgroup	AGS	Ongoing
Appropriate co-ordination and information sharing with Irish Government	DOJ	Ongoing
Effective co-operation on child protection matters with ROI colleagues through the North-South Ministerial Council child protection subgroup	DHSSPS	Ongoing
Participation in Santa Marta Group's North Atlantic Maritime Project	PSNI, DOJ, AGS, DOJE	Ongoing

<b>Objective 4:</b> Engagement with the Anti-slavery Commissioner		
<b>Action</b>	<b>Owner</b>	<b>Target date</b>
Co-operation with the Anti-Slavery Commissioner	Specified public authorities	Ongoing
Implementation of Commissioner recommendations	All	As appropriate
Strategic alignment with the Commissioner's strategic plan	DOJ and partners	Ongoing

### Prosecutors Commitments

#### Overarching Commitment:

The Prosecuting Authorities in the UK will work closely together and with our law enforcement partners to disrupt networks, prosecute traffickers and safeguard victims' rights within the Criminal Justice Process.

#### How will we do this?

- We will build strong cases to support these most serious offences;
- We will ensure that the rights and welfare of victims are at the heart of our approach to investigation and prosecution;
- We will continue to deliver training and development to prosecutors and law enforcement to improve our expertise; and
- We will work closely together to learn lessons, exchange good practice and share relevant information, data and contacts.

#### Building Strong Cases

We will continue to work closely with law enforcement and other partners to ensure that any cases in relation to these types of offences are prepared and prosecuted robustly.

We will;

- Provide appropriate advice and support to reporting agencies at all stages of the investigative process.
- Identify and utilise expert witnesses in relevant cases.
- Consider the use of overseas support and assistance, in particular through mutual legal assistance or joint investigative teams.

- Ensure that financial investigation and proceedings in relation to Proceeds of Crime legislation are pursued where appropriate.

### **Victims and Witnesses**

We will continue to ensure that the welfare of victims, witnesses and potential victims of human trafficking are at the heart of our approach to investigating and prosecuting offences of human trafficking.

We will;

- Treat all victims and witnesses of human trafficking with respect, sensitivity and professionalism;
- Communicate with victims and witnesses clearly and effectively ensuring that information is provided at all stages of the case by the most appropriate means and is translated where required;
- Signpost victims and witnesses where appropriate to help them to access agencies who provide additional support.
- Recognise that victims and witnesses of human trafficking often face complex barriers to giving evidence in criminal cases and proactively explore whether special measures are required to assist those victims and witnesses to give their best evidence throughout the case;
- Endeavour to ensure that support and assistance are available to victims and witnesses who are living in other jurisdictions.
- Use feedback from victims, witnesses and any other relevant individuals or groups to inform changes and improvements to our services;

### **Code of Conduct**

We will adhere to the relevant Code or Code of Conduct for Prosecutors and all other relevant prosecution guidance in our respective jurisdictions when making any decision in relation to the prosecution of Human Trafficking cases.

We will;

- Ensure that the law is properly applied and that the right person is prosecuted for the right crime.
- Be fair, independent and objective at all stages of the case.



- Not let any personal views about the ethnic or national origin, gender, disability, age, religion or belief, political views, sexual orientation, or gender identity of the suspect, victim or any witness influence decisions.
- Not be affected by undue or improper pressure from any source.
- Act in the interests of justice and not solely for the purpose of obtaining a conviction.
- Act in a manner which ensures any prosecution is dealt with efficiently and without undue delay.

### **Training**

We will periodically review and update the provision of training for all staff who may be involved in the investigation and prosecution of Human Trafficking.

Training available on Human Trafficking will include the following information;

- A summary of the dynamics found in situations of human trafficking;
- The common indicators that an individual has been trafficked;
- The legislative framework relating to human trafficking and modern slavery;
- Any case law involving human trafficking applicable to the jurisdiction;
- Examples of the specific vulnerabilities of victims of human trafficking;
- Best practice in communicating with victims and witnesses of human trafficking both in and out of the Court setting.
- Any other lessons learned from cases prosecuted across the UK.

### **Non-Governmental Organisations**

We recognise the important role that Non-Governmental Organisations (NGOs) have in working to eradicate human trafficking and in supporting victims of human trafficking. We commit to developing and maintaining effective means of engagement with NGOs.

The purpose of such engagement is;

- To ensure there is an understanding of the complex nature of human trafficking and the needs and experiences of victims;

- To enable NGOs to share their expertise to assist with the development of best practice, policy, guidelines and training;
- To provide NGOs with a fuller understanding of the Criminal Justice Process; and
- To facilitate the exchange of information.

### **Exchange of Information**

We will continue to work closely on all aspects of human trafficking and will undertake to exchange information to learn lessons from each other and develop our experience to lead to an improved response across the UK in the prosecution of these cases.

We will;

- Meet on a regular basis to discuss and exchange experience.
- Exchange good practice on all aspects of cases of human trafficking, including case building, evidential issues, victim support and protection, use of experts and presentation of evidence including digital working.
- Exchange training materials and opportunities to attend training courses in each other's jurisdictions.
- Share legal and policy guidance, particularly for new legislation.
- Share relevant case law involving human trafficking which may impact the way cases are prosecuted.
- Share data on cases of human trafficking
- Exchange useful contacts for obtaining assistance within the UK and across other jurisdictions

**RESPONSE QUESTIONNAIRE - DRAFT NORTHERN IRELAND HUMAN  
TRAFFICKING AND MODERN SLAVERY STRATEGY 2016/17**

**Consultee Details**

Contact name

Name and address of  
organisation

Email address

Are you content for your response to be published in full or in part? (If in part, please specify those parts that should not be published)

YES / NO / IN PART

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**Questions**

We would welcome responses to the following questions:

***Question 1***

Section 12 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015, requires a strategy to be developed to raise awareness of human trafficking and slavery-like offences in Northern Ireland and to contribute to a reduction in the number of such offences. The strategy is required to cover:

- the arrangements for co-operation between relevant organisations;
- provision as to the training and equipment for investigators, prosecutors and those dealing with victims; and
- provisions aimed at raising awareness of the rights and entitlements of victims.

**In your view, does the draft strategy meet these requirements under section 12 of the Act?**

YES / NO

Please give your reasons and comments here:

### **Strategic aim**

#### ***Question 2***

The proposed overall strategic aim of the draft strategy is: “*Equipping Northern Ireland to eradicate human trafficking and modern slavery whilst protecting and supporting victims*”.

**In your view, is this strategic aim appropriate?**

YES / NO

Please give your reasons and comments here, or suggest an alternative strategic aim:

## **Strategic priorities**

### **Question 3**

Four strategic priorities have been proposed which underpin the strategic aim.

These are:

- Pursue (effective detection, disruption, investigation and prosecution of offenders);
- Protect and support (improved identification of victims and the provision of effective protection and support);
- Prevent (prevent and reduce risk of human trafficking and modern slavery offences in Northern Ireland); and
- Partnership (effective, collaborative and joined-up partnership response).

**In your view are these the right strategic priorities? What, if any, alternatives would you propose?**

YES / NO

Please give your reasons and comments here, along with any proposed alternatives to the proposed strategic priorities:

**SP1: Pursue - effective detection, disruption, investigation and prosecution of offenders**

**Question 4(a) - objectives**

The draft strategy has identified the following objectives in support of the “Pursue” priority:

- Effective investigations and prosecutions;
- Improved understanding of human trafficking and exploitation; and
- Effective training for law enforcement and prosecutors.

**In your opinion are these proposed objectives appropriate? Are there any additional objectives that in your opinion should also be included?**

YES / NO

Please give your reasons and comments here, as well as any additional objectives that you believe should be included:

**Question 4(b) - actions**

The proposed actions associated with this strategic priority are set out at pages 20-22 of the consultation document.

**In your opinion are these proposed actions appropriate? Are there any additional actions that in your opinion should also be included?**

YES / NO

Please give your reasons and comments here, as well as any additional actions that you believe should be included:

**SP2: Protect and Support – improved identification of victims and the provision of effective protection and support**

**Question 5(a)**

The draft strategy has identified the following objectives in support of the “Protect and Support” priority:

- Improved victim identification;
- Protection and support services for victims and potential victims; and
- Champion the rights and entitlements of victims and potential victims.

**In your opinion are these proposed objectives appropriate? Are there any additional objectives that in your opinion should also be included?**

YES / NO

Please give your reasons and comments here, as well as any additional objectives that you believe should be included:



**Question 5(b)**

The proposed actions associated with this strategic priority are set out at pages 23-26 of the consultation document.

**In your opinion are these proposed actions appropriate? Are there any additional actions that in your opinion should also be included?**

YES / NO

Please give your reasons and comments here, as well as any additional actions that you believe should be included:

**SP3: Prevent – Prevent and reduce the risk of human trafficking and modern slavery offences in Northern Ireland**

**Question 6(a)**

The draft strategy has identified the following objectives in support of the “Prevent” priority:

- Engagement with perceived ‘at-risk’ groups to reduce risk;
- Raise awareness, to increase reporting and reduce demand;
- Evaluate effectiveness and capture best practice

**In your opinion are these proposed objectives appropriate? Are there any additional objectives that in your opinion should also be included?**

YES / NO

Please give your reasons and comments here, as well as any additional objectives that you believe should be included:

**Question 6(b)**

The proposed actions associated with this strategic priority are set out at pages 27-28 of the consultation document.

**In your opinion are these proposed actions appropriate? Are there any additional actions that in your opinion should also be included?**

YES / NO

Please give your reasons and comments here, as well as any additional actions that you believe should be included:

**SP4: Partnership – Effective, collaborative and joined-up partnership response**

**Question 7(a)**

The draft strategy has identified the following objectives in support of the “Partnership” priority:

- Co-operation across Government and statutory agencies;
- Co-operation between Government and civil society;
- Effective cross-border co-operation; and
- Engagement with the Anti-Slavery Commissioner

**In your opinion are these proposed objectives appropriate? Are there any additional objectives that in your opinion should also be included?**

YES / NO

Please give your reasons and comments here, as well as any additional objectives that you believe should be included:

**Question 7(b)**

The proposed actions associated with this strategic priority are set out at pages 29-30 of the consultation document.

**In your opinion are these proposed actions appropriate? Are there any additional actions that in your opinion should also be included?**

YES / NO

Please give your reasons and comments here, as well as any additional actions that you believe should be included:

An electronic version of this document is available in the consultation section of the Department of Justice website ([www.dojni.gov.uk](http://www.dojni.gov.uk)). Hard copies will be posted on request. Text-phone contact details are provided below.

Copies in other formats, including Braille, large print, computer disk etc may be made available on request. Please let us know if you need copies in an alternative language or format.

Responses should be emailed to [htconsultation@justice-ni.x.gsi.gov.uk](mailto:htconsultation@justice-ni.x.gsi.gov.uk) or posted to the following address:

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Protection and Organised Crime Division  
Department of Justice  
Room B4.20  
Castle Buildings  
Stormont Estate  
Belfast  
BT4 3SG  
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**The closing date for this consultation is 17:00 Friday 9 September 2016**

