



**DoJ**

Department  
of Justice

[www.justice-ni.gov.uk](http://www.justice-ni.gov.uk)

**Draft Northern Ireland Modern Slavery Strategy 2018-2019**

**Consultation Document**

**July 2018**

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## **Section 1 – About this consultation**

- 1.1 Section 12 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 requires the Department of Justice (DOJ) to produce an annual modern slavery strategy for Northern Ireland.
- 1.2 We are consulting on the proposed draft of the third strategy developed in accordance with Section 12 of the Act; it builds on a significant body of work to tackle modern slavery that has already been delivered through previous strategies and action plans.
- 1.3 The draft strategy has been developed and informed through significant engagement with other partners across Government, law enforcement and civil society who are committed to working together to tackle modern slavery both in Northern Ireland and globally. In its development, we have also been informed by intelligence and information provided by law enforcement partners and we have taken account of ongoing work, initiatives and strategic approaches that have been put in place in neighbouring jurisdictions in the UK and Ireland, and internationally.
- 1.4 This consultation seeks views from key stakeholders across a wide range of sectors. These include organisations such as the Police Service of Northern Ireland, the Public Prosecution Service, Policing and Community Safety Partnerships, the Department of Health, the Health & Social Care Board, Health & Social Care Trusts, the Department for the Economy, the Department for Communities, and the Gangmasters Labour Abuse Authority. We are also seeking views and comments from the Office of the UK Independent Anti-Slavery Commissioner, the UK Government, local councils in Northern Ireland, businesses and private sector organisations, faith groups,

organisations within the voluntary and community sector, and individual members of the wider public.

- 1.5 A number of the organisations listed above have already been involved in helping to develop and design this strategic response and, because of the nature of their roles and responsibilities may have a clear and direct interest in tackling this crime, through pursuit of perpetrators, support for victims or through preventing further victims. However, modern slavery cuts across all sectors of society and can affect all of us. We are therefore keen to hear views and comments from individuals and organisations across all sectors to ensure that the resulting strategy is as informed, comprehensive and effective as possible.

## Section 2 – How to respond

### Duration and closing date

- 2.1 The consultation will be open until 18 October 2018 and any responses will be welcomed up to that date.

### Questions

- 2.2 There are a number of questions posed throughout the document to assist you in considering the draft strategy. The Strategy is set out at **Annex A** along with a Response Sheet at **Annex B**. In order to aid our analysis of responses it would be helpful if you could use this Response Sheet when responding to the consultation.

### Enquiries and Responses

- 2.3 Please address any enquiries you may have and responses to:

By phone: 028 90 523108

By e-mail: [OCB.enquiries@justice-ni.x.gsi.gov.uk](mailto:OCB.enquiries@justice-ni.x.gsi.gov.uk)

In writing: Organised Crime Branch  
Protection and Organised Crime Division  
Department of Justice  
Castle Buildings  
Stormont Estate  
BELFAST  
BT4 3SG

- 2.4 The Department intends to publish responses to the consultation and a summary of responses on our website. Any contact details or information that would identify a respondent as a private individual will be removed prior to publication. All information will be handled in accordance with the Data Protection Act 1998 (DPA).
- 2.5 Respondents should also be aware that the Department's obligations under the Freedom of Information Act 2000 (FOIA) may require that any responses not subject to specific exemptions under the Act be communicated to third parties on request.

### **Alternative Formats**

- 2.6 An electronic version of this document is available in the consultation section of the Department of Justice website (<https://www.justice-ni.gov.uk/consultations/draft-modern-slavery-strategy-2018-19>). Hard copies of this consultation document, and copies in other formats (including Braille, large print etc.), can be made available on request. If it would assist you to access the document in an alternative format or language other than English, please let us know and we will do our best to assist you.

### **Complaints**

- 2.7 If you have any concerns about the way this consultation process has been handled, you should send them to the following address:

Standards Unit  
Department of Justice  
Knockview Buildings  
Stormont Estate  
Belfast BT4 3SL  
Email: [Standardsunit@justice-ni.x.gsi.gov.uk](mailto:Standardsunit@justice-ni.x.gsi.gov.uk)

## Section 3 – Introduction

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

### *Scale*

3.2 Modern slavery offences are largely hidden crimes, which often makes it difficult to establish an accurate assessment of the nature and extent of the problem in Northern Ireland. The National Referral Mechanism (NRM) is the UK's referral mechanism for identifying and supporting victims and potential victims of modern slavery. It currently helps to inform much of our understanding of the nature and scale of human trafficking and modern slavery across the United Kingdom. However, it is widely accepted that the NRM only reveals part of the total picture. **Some of the objectives identified in the draft strategy are therefore intended to improve our understanding of, and our response to, modern slavery in Northern Ireland.**

3.3 We are able to get an indication of how modern slavery is affecting Northern Ireland by looking at some of the statistics that PSNI records. During the

2016/17 financial year, the PSNI's Modern Slavery and Human Trafficking Unit (MSHTU) recovered 34 potential victims of human trafficking in Northern Ireland and referred them to the NRM. During the same period, MSHTU conducted 308 screening assessments to help identify suspected cases of human trafficking or modern slavery. During the 2016/17 financial year, MSHTU made 10 arrests and conducted a total of 27 searches, as well as 52 safeguarding visits or non-warrant operations in relation to concerns about labour or sexual exploitation.

### *Lifespan of strategy*

3.4 This new draft strategy is intended to cover the period up to the end of Financial Year 2018/19. However, we know that some of the proposed objectives and work-streams will take longer than the one-year lifespan of this strategy to implement and will carry over into the next year. As such, while the lifespan of the strategy is a twelve month period, **Appendix 1** gives an indication of how work-streams may continue into the following year. This allows the draft strategy to indicate a longer term direction of travel, as well as providing an overview of commitments with indicative time-frames for delivery across a two-year period. **This longer view will also help us to be able to prioritise more effectively and to identify meaningful strategic outcomes.**



## Section 4 – The draft Northern Ireland Modern Slavery Strategy 2018-2019

### *Draft strategy*

- 4.1 A copy of the draft strategy is included at **Annex A**. The legislation requires the annual strategy to include provision for work across a number of specific areas. For ease of reference, these are set out below and are also mapped against the relevant parts within the draft strategy itself.

Legislative requirement	Reference in strategy
Arrangements for co-operation between relevant organisations in dealing with relevant offences or the victims of such offences.	R1
Provision as to the training and equipment of those involved in investigating or prosecuting relevant offences or dealing with the victims of such offences.	R2
Provisions aimed at raising awareness of the rights and entitlements of victims of such offences	R3

### *Strategic aim*

- 4.2 The legislation sets out that the purpose of the strategy is to raise awareness of modern slavery offences and so to reduce the threat from, the vulnerability to, and the prevalence of, modern slavery in Northern Ireland. To this end, our Strategic Aim is “**Equipping Northern Ireland to eradicate modern slavery**”. We acknowledge that the eradication of modern slavery from Northern Ireland is an aspirational aim that cannot be delivered within the

lifespan of a twelve month strategy. However, we remain of the view that this should be the ultimate strategic aim that we strive towards and that the Priorities, Objectives and Actions set out in this draft strategy should help us to progress towards that aim. Eradicating modern slavery will demand a whole-of-society response and, as such, much of the focus of this proposed strategic response is on **equipping** law enforcement, key sectors and indeed wider society with the right tools, skills and awareness to work towards the eradication of modern slavery.

### *Strategic Priorities*

4.3 Underpinning the strategic aim are three Strategic Priorities: PURSUE, PROTECT and PREVENT.

- PURSUE – the actions under the PURSUE strand seek to enhance the **operational response** in detecting, investigating, disrupting and prosecuting modern slavery offenders;
- PROTECT – reducing the harm caused by modern slavery by **improved victim identification and support** remains a central pillar in our proposed strategic response; however, this alone is not enough – we need to prevent people from getting drawn into slavery in the first place;
- PREVENT – this strand therefore seeks to reduce the threat of modern slavery by **reducing vulnerability and demand** by **raising awareness** and ensuring that key sectors and the general public are equipped to spot the signs of exploitation and report any suspicions. It also seeks to strengthen cross-sector resilience through adopting a more strategic approach to training by conducting a training needs analysis and developing and delivering a training plan for relevant sectors.

4.4 In contrast to some of our previous strategies, we do not propose to include PARTNERSHIP as a fourth Strategic Priority. This is in no way intended to undermine the importance of partnership. Rather, it reflects the fact that a partnership approach is inherent in, and flows through, the effective delivery of **all** our priorities under this draft strategy. We want to acknowledge and pay tribute to the degree of commitment to eradicating modern slavery and to working together that has already been demonstrated by our delivery partners across statutory and non-statutory sectors. Partnership is therefore embedded across each of the Strategic Priorities and will continue to underpin all that we do to deliver the objectives in this strategy.

**Q1: Do you consider the draft Strategic Priorities of PURSUE, PROTECT AND PREVENT to be the appropriate ones for this strategy?**

YES/NO

*Please respond using the Response Sheet at Annex B*

**Q2: Have you any other comments or suggestions on the Strategic Priorities?**

*Please respond using the Response Sheet at Annex B*

#### *Impact of strategy*

4.5 The draft strategy seeks to anticipate outcomes and to describe what success under each of the three Strategic Priorities (PURSUE, PROTECT and PREVENT) should look like. Against these successful outcomes, the draft strategy also proposes a range of data and measures which we will capture to help to inform our understanding both of the nature of modern slavery in Northern Ireland and our response.

4.6 The interaction between the various measures can be complex and caution must be applied as these measures should not be interpreted as reliable indicators of success or failure. For example, whilst an increase in the number of victims referred to the NRM could indicate an increase in the scale of modern slavery, it may also indicate higher levels of awareness, identification of victims and reporting of suspected cases. Nonetheless, over a **longer** period of time, if our actions are being effective, we would expect to see an eventual decline in referrals. Equally, the nature of individual cases in Northern Ireland can have a significant impact on how referral figures fluctuate year by year, particularly where multiple victims are recovered in a single operation. The type of offence can also fluctuate from year to year, with more labour offences in one year and more sexual exploitation cases detected in another year. Similarly, the number of people charged with an offence or prosecuted and convicted might rise or fall depending on whether a large criminal gang has been successfully dismantled, or a small criminal gang which nonetheless had multiple victims, or indeed on the willingness of the victims involved to co-operate with criminal justice proceedings.

4.7 The measures we are proposing to include have been discussed and agreed with key statutory and non-statutory partners. In prioritising **these** measures we have sought to balance:

- the need to include only data that is available and can be accurately measured;
- those measures which carry **the most significant value** in assisting our understanding of modern slavery and the impact of our response on it; and
- the availability of resources and our capacity to deliver within the time-frame.

### *Disruption*

4.8 In addition to criminal justice measures, the draft strategy also promotes an approach that includes disruptive tactics. Disruptive actions are carried out by

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

4.9 In the draft strategy, we have also sought to indicate the level of **current capability and practice** under each of the Strategic Priorities. However, our focus is on what will add value and make a difference. The draft strategy therefore sets out **objectives, actions** (“we will”) and **mechanisms for delivery** for each of the three Strategic Priorities.

4.10 We believe that the proposed strategy is challenging and ambitious and that it will enhance and improve our response to modern slavery. However it is also important that the strategy is achievable and realistic. Our approach to identifying priorities, objectives and work-streams has been to work with key stakeholders to agree those areas where we believe our actions and objectives will make the most positive difference, given the resources and capacity available to us.

#### **STRATEGIC PRIORITY 1:        *PURSUE***

4.11 The **PURSUE** priority covers work related to *detecting, investigating, disrupting and prosecuting modern slavery offenders*.

4.12 In line with the caveat at paragraph 4.6 above, we have proposed that we will capture data on a number of **measures** that we believe will be most helpful in informing our understanding of the nature of modern slavery in Northern Ireland, and our response to it. Under PURSUE these proposed measures are:

- number of Modern Slavery/Human Trafficking investigations;
- number of PSNI screening assessments;
- number of victim referrals to the National Referral Mechanism;
- number of people charged for modern slavery offence;
- number of people reported to the Public Prosecution Service for modern slavery offence;
- prosecution and conviction figures;
- % of convictions resulting in a Slavery Trafficking Prevention Order (STPO) or other ancillary order;
- monetary value of orders made under the Proceeds of Crime Act 2002.

**Q3: In general, do you consider that the measures proposed under PURSUE are the appropriate ones?**

YES/NO

*Please respond using the Response Sheet at Annex B*

**Q4: Are there any measures under PURSUE that you believe should be added or omitted (please provide reasons)?**

*Please respond using the Response Sheet at Annex B*

4.13 We have suggested a number of outcomes that we believe should flow from the effective and successful delivery of the PURSUE priority. These are:

- victims of modern slavery identified and brought to safety;

- the prosecution and conviction of modern slavery offenders;
- the disruption of criminals and organised crime groups responsible for modern slavery.

4.14 The proposed **objectives, actions** and **delivery mechanisms** for PURSUE are set out at pages 26 to 29 of the draft strategy (**Annex A**) and we invite comments on these.

**Q5: In general, do you consider that the objectives, actions and delivery mechanisms proposed under PURSUE are the appropriate ones?**

YES/NO

*Please respond using the Response Sheet at Annex B*

**Q6: Do you have any further comments or suggestions for additions or omissions under PURSUE?**

*Please respond using the Response Sheet at Annex B*

## **STRATEGIC PRIORITY 2: PROTECT**

4.15 The **PROTECT** priority covers work related to *reducing the harm caused by modern slavery by improved victim identification and support.*

4.16 Again, in line with the caveat in paragraph 4.6, we have worked with our delivery partners to identify and suggest those **measures** that we believe will best inform our understanding of the nature of modern slavery in Northern Ireland, and our response to it; under PROTECT these are:

- number of victim referrals to the National Referral Mechanism (NRM);

- number of re-victimised victim referrals to the NRM (subject to system capability to provide data);
- number of non-NRM potential victims referred to NGOs for contact and advice (subject to agreement of the scheme);
- number of PSNI screening assessments;
- number of victims supported through the DOJ contract;
- number of children, and young people in aftercare, supported by Health & Social Care Trusts and through the Health & Social Care Board residential facility;
- number of children supported through the independent guardian scheme;
- training delivered to front line professionals.

**Q7: In general, do you consider that the measures proposed under PROTECT are the appropriate ones?**

YES/NO

*Please respond using the Response Sheet at Annex B*

**Q8: Are there any measures under PROTECT that you believe should be added or omitted (please provide reasons)?**

*Please respond using the Response Sheet at Annex B*

4.17 Again, we have outlined in the draft strategy a number of outcomes that we believe would flow from effective and successful delivery against the PROTECT priority; these are:

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



4.18 The proposed **objectives, actions** and **delivery mechanisms** for PROTECT are set out at pages 31 to 34 of the draft strategy (**Annex A**) and again we invite comments on these.

**Q9: In general, do you consider that the objectives, actions and delivery mechanisms proposed under PROTECT are the appropriate ones?**

YES/NO

*Please respond using the Response Sheet at Annex B*

**Q10: Do you have any further comments or suggestions for additions or omissions under PROTECT?**

*Please respond using the Response Sheet at Annex B*

### **STRATEGIC PRIORITY 3: PREVENT**

4.19 The **PREVENT** priority covers work relating to *reducing the threat of modern slavery by reducing vulnerability and demand and by raising awareness.*

4.20 Again, we have worked with partners to identify and propose the range of **measures** that we believe will best inform our understanding of modern slavery in Northern Ireland, and our response to it. Under PREVENT these are:

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

**Q11: In general, do you consider that the measures proposed under PREVENT are the appropriate ones?**

YES/NO

*Please respond using the Response Sheet at Annex B*

**Q12: Are there any measures under PREVENT that you believe should be added or omitted (please provide reasons)?**

*Please respond using the Response Sheet at Annex B*

4.21 As with the other two strategic priorities, we have outlined in the draft strategy a number of outcomes that we believe would flow from effective and successful delivery against PREVENT; these are:

- fewer offenders engaging in modern slavery crime;
- fewer victims entrapped by modern slavery; and
- reduced demand through increased awareness.

4.22 The proposed **objectives, actions and delivery mechanisms** for PREVENT are set out at pages 35 to 37 of the draft strategy (**Annex A**). Again, we invite comments on these.

**Q13: In general, do you consider that the objectives, actions and delivery mechanisms proposed under PREVENT are the appropriate ones?**

YES/NO

*Please respond using the Response Sheet at Annex B*

**Q14: Do you have any further comments or suggestions for additions or omissions under PREVENT?**

*Please respond using the Response Sheet at Annex B*

4.23 Any other comments on the draft strategy are welcome.

**Q15: Please provide any other comments which you wish to make on the draft strategy.**

*Please respond using the Response Sheet at Annex B*

## **Section 5 – Impact Assessments**

- 5.1 The Department of Justice has conducted a rural needs impact assessment and equality and data protection impact screening exercises on the draft strategy and has identified that there is no potential adverse impact on any groups. These screening assessments will be revisited if necessary if there are significant changes to the strategy as a result of consultation comments.

## **Section 6 – Next Steps**

- 6.1 As noted, the consultation closes on 18 October. Any comments or suggestions received by that date will be fully considered by the Department and a summary published, with any further appropriate revisions then made to the strategy before final publication, subject to approvals.

## Section 7 – Freedom of Information and Privacy Notice

- 7.1 Please note that responses to this consultation will be subject to the Freedom of Information Act 2000, which gives the right of access to much of the information held by public authorities. Before you submit your response, please read the advice in **Annex C** about the effect of the Freedom of Information Act 2000 on the confidentiality of responses to public consultation exercises.
- 7.2 Before you submit a response, please also read the Privacy Notice at **Annex D** which shows how we will use personal information as part of the processing of consultation responses.

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Annex A



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**Justice**  
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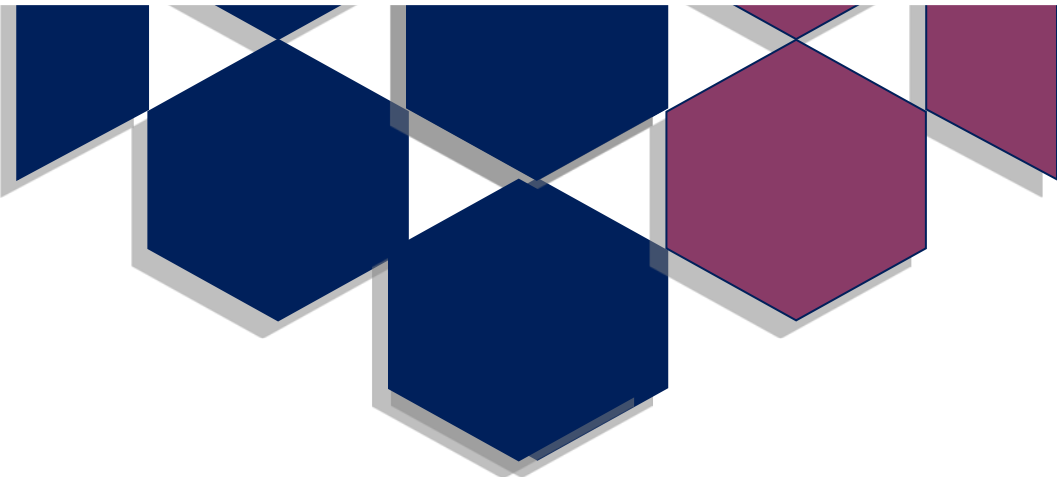


**ORGANISED  
CRIME  
TASK FORCE**



## NORTHERN IRELAND MODERN SLAVERY STRATEGY

2018 - 2019



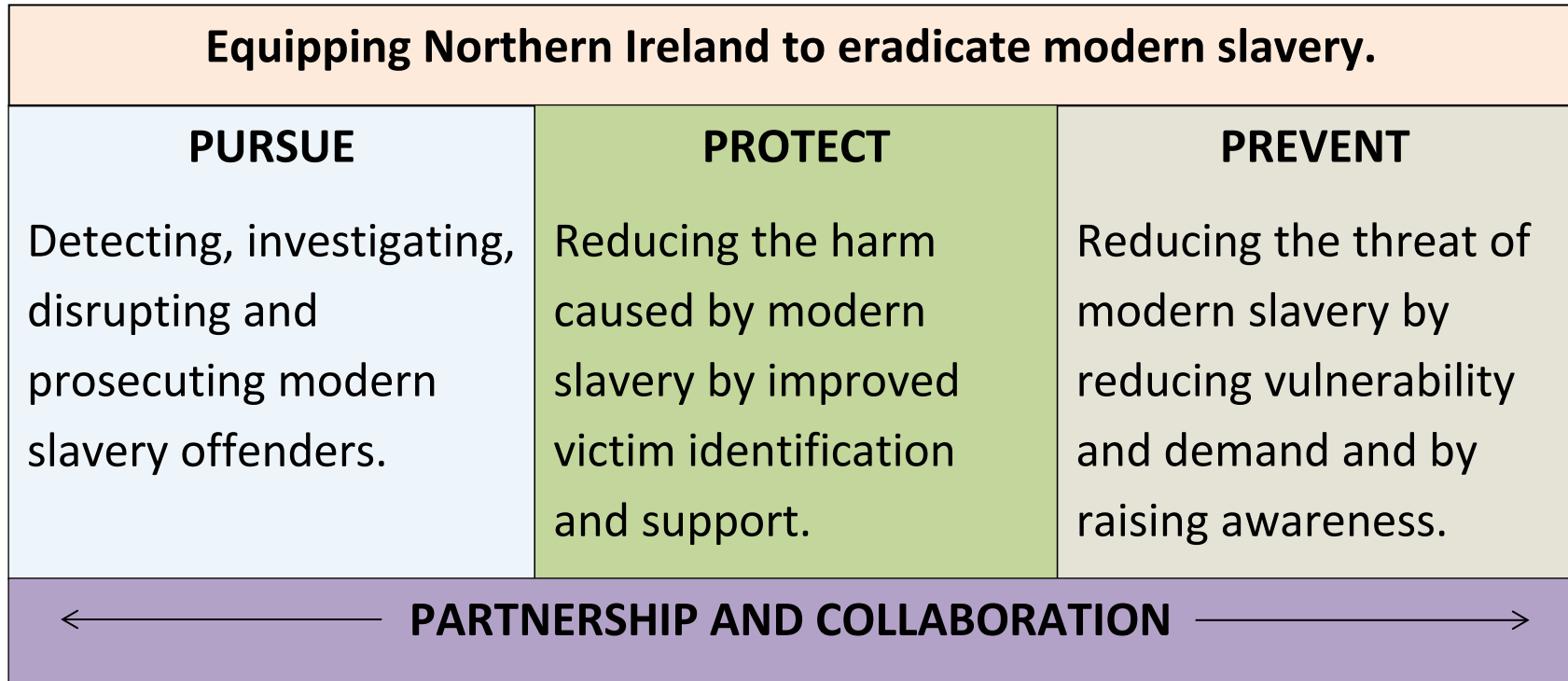
## This strategy:

- sets the strategic direction for 2018/19;
- provides focussed and shared strategic priorities and objectives;
- enhances the operational response to **PURSUE** and disrupt offenders and bring them to justice;
- puts the **PROTECTION** and needs of victims at the centre of our response;
- engages partners across key services, business, non-Governmental organisations and the wider public in **PREVENTING** modern slavery.
- is ambitious and challenging, but still achievable; and
- will contribute to our ultimate aim of ending modern slavery.



1. STRATEGY

**NORTHERN IRELAND MODERN SLAVERY STRATEGY 2018-19**



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

### Success in **PURSUE** will mean:

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

### **We will measure:**

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

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

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

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

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

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

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

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

Success in **PROTECT** will mean:

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

**We will measure:**

- number of victim referrals to NRM;
- number of re-victimised victim referrals to NRM (subject to system capability to provide data);
- number of non-NRM potential victims referred to NGOs for contact and advice (subject to agreement of the scheme);
- number of PSNI screening assessments;
- number of victims supported through the DOJ contract;
- number of children, and young people in aftercare, supported by HSCTs and through the HSCB residential facility;
- number of children supported through the independent guardian scheme;
- training delivered to front line professionals.

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

- victim support and protections enshrined in legislation;
- dedicated contracted provision addressing Trafficking Survivors Care Standards in place for support and assistance to victims of modern slavery;

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

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

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



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

		<p>provisions to enable victims to provide best evidence at court;</p> <ul style="list-style-type: none"> <li>- provision of appropriate information and support for victims engaging in the criminal justice process via the Victim Witness Care Unit (VWCU);</li> <li>- delivery of appropriate training to Prosecutors and Prosecuting Counsel to support vulnerable victims and to ensure compliance with the Victims Charter.</li> </ul>
<p>Provide specialist support to child victims of modern slavery that recognises their unique vulnerabilities</p> <p>(R1, R2, R3)</p>	<ul style="list-style-type: none"> <li>- ensure that an Independent Guardian service is in place to assist, represent and support separated or trafficked children and victims of Modern Slavery;</li> <li>- ensure appropriate accommodation options are available to meet the needs of child victims;</li> <li>- ensure that appropriate guidance is in place for HSC Trust staff and PSNI</li> </ul>	<ul style="list-style-type: none"> <li>- procurement of Independent Guardian service for separated and trafficked children;</li> <li>- analysis of availability and suitability of current care placement provision and post care accommodation for child victims and those leaving care will be kept under review by Health &amp; Social Care Board in consultation with HSC Trusts and the Regional Practice Network;</li> <li>- development of guidance on working arrangements for Trust staff and PSNI</li> </ul>

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	on actions to take when they encounter a child who they suspect may be a victim of human trafficking or modern slavery.	officers when they encounter possible child victims of human trafficking or modern slavery.
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**PREVENT:** Reducing the threat of modern slavery by reducing vulnerability and demand and by raising awareness.

Success in **PREVENT** will mean:

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

**We will measure:**

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

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

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

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

Objective	We will	Mechanisms for delivery
Reduce vulnerability to	- engage with at-risk communities;	- training / awareness with homeless sector;

<p>exploitation and re-exploitation</p> <p>(R1, R2, R3)</p>	<ul style="list-style-type: none"> <li>- support / promote initiatives to educate and provide rights-based information.</li> </ul>	<ul style="list-style-type: none"> <li>- Engagement Group;</li> <li>- Sex Worker Liaison Group;</li> <li>- strengthen links with PCSPs and local government;</li> <li>- Engagement Group initiatives;</li> <li>- Freedom Acts #Five Campaign;</li> <li>- engagement / information through intercultural programmes;</li> <li>- use of on-line social media to mitigate against vulnerability to trafficking and modern slavery.</li> </ul>
<p>Strengthen cross-sector resilience against modern slavery</p> <p>(R1, R2, R3)</p>	<ul style="list-style-type: none"> <li>- increase engagement with relevant sectors to raise awareness of risk and promote good practice.</li> </ul>	<ul style="list-style-type: none"> <li>- engagement across social care and health sectors;</li> <li>- engagement with agri-food sector;</li> <li>- development and delivery of training and awareness initiatives;</li> <li>- ongoing delivery of Stronger Together initiative;</li> <li>- proactive engagement with relevant trade press;</li> <li>- Training Needs Analysis to consider awareness of procurement issues;</li> <li>- training for public sector procurement leads in respect of transparency in supply chains.</li> </ul>

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<p>Raise public awareness to reduce demand and increase reporting</p> <p>(R, R2, R3)</p>	<ul style="list-style-type: none"><li>- proactive media engagement on presence of modern slavery and on operational successes;</li> <li>- development and delivery of public awareness materials.</li></ul>	<ul style="list-style-type: none"><li>- development of OCTF Communications Group and Communications Plan;</li><li>- proactive agency engagement with media and social media;</li><li>- strengthened links with partner organisations;</li><li>- refresh of on-line public information on modern slavery/human trafficking;</li> <li>- development and strategic dissemination of public awareness materials;</li><li>- ongoing delivery of training / awareness sessions;</li><li>- maintain presence at high profile public events.</li></ul>
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## 2. COMMITMENTS DELIVERY OVERVIEW:

Appendix 1

YEARS		
	2018/19	2019/20
<b>PURSUE</b>		
legislative framework	<ul style="list-style-type: none"> <li>- ongoing use of multi-agency sanctions – case by case basis;</li> <li>- consideration of further legislative proposals (including Haughey review);</li> <li>- consideration of further legislative proposals and any required changes;</li> <li>- DOJ review of organised crime legislation.</li> </ul>	<ul style="list-style-type: none"> <li>- ongoing use of multi-agency sanctions – case by case basis.</li> <li>- development of legislative options, if required.</li> </ul>
operational response	<ul style="list-style-type: none"> <li>- ongoing multi-agency response – case by case basis;</li> <li>- ongoing use of mechanisms for international co-operation;</li> <li>- development of cyber capabilities;</li> <li>- use of on-line social media to mitigate against vulnerability to trafficking and modern</li> </ul>	<ul style="list-style-type: none"> <li>- ongoing multi-agency response – case by case basis;</li> <li>- ongoing use of mechanisms for international co-operation;</li> </ul>
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	<p>slavery;</p> <ul style="list-style-type: none"> <li>- ongoing use of forfeiture and confiscation powers – case by case basis;</li> <li>- consideration of HMICFRS review findings from Stolen Freedom: the policing response to modern slavery and human trafficking (England and Wales);</li> <li>- consideration of mechanism for information sharing between government agencies.</li> </ul>	<ul style="list-style-type: none"> <li>- ongoing use of forfeiture and confiscation powers – case by case basis;</li> <li>- consideration of mechanism for information sharing between government agencies.</li> </ul>
<p>learning and best practice</p>	<ul style="list-style-type: none"> <li>- ongoing training;</li> <li>- extended provision of South Wales Police Organised Crime Modern Slavery Senior Investigating Officers Course and any relevant new College of Policing courses;</li> <li>- work with Independent Anti-Slavery Commissioner to identify learning opportunities for stakeholders across the justice system;</li> <li>- ongoing PPS liaison with other organisations regarding best practice.</li> </ul>	<ul style="list-style-type: none"> <li>- ongoing PPS liaison with other organisations regarding best practice.</li> </ul>



YEARS		
	2018/19	2019/20
<b>PROTECT</b>		
Identify victims of modern slavery	<ul style="list-style-type: none"> <li>- ongoing policy work on Duty to Notify provisions;</li> <li>- multi-agency engagement on reporting pathways;</li> <li>- ongoing promotion of the Modern Slavery Helpline;</li> <li>- continued delivery of training and awareness sessions to relevant frontline professionals;</li> <li>- development of tailored and standardised training with UK Modern Slavery Training Delivery Group;</li> <li>- development of Training Needs Analysis and Training Plan;</li> </ul>	<ul style="list-style-type: none"> <li>- implementation of Duty to Notify legislation and statutory guidance;</li> <li>- ongoing promotion of the Modern Slavery Helpline;</li> <li>- start strategic roll out of Training Plan.</li> </ul>

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

	<p>potential child victims of modern slavery;</p> <ul style="list-style-type: none"><li>- roll-out of Independent Guardian service to assist, represent and support separated or trafficked children and victims of modern slavery;</li><li>- analysis of availability and suitability of current care placement provision and post care accommodation for child victims and those leaving care will be kept under review by Health &amp; Social Care Board in consultation with HSC Trusts and the Regional Practice Network;</li><li>- implementation by Trusts and PSNI of guidance on working arrangements that should be followed by HSC Trust staff and PSNI officers when they encounter possible child victims of human trafficking or modern slavery.</li></ul>	<ul style="list-style-type: none"><li>- analysis of availability and suitability of current care placement provision and post care accommodation for child victims and those leaving care will be kept under review by Health &amp; Social Care Board in consultation with HSC Trusts and the Regional Practice Network;</li></ul>
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YEARS		
	2018/19	2019/20
<b>PREVENT</b>		
Reduce vulnerability to exploitation	<ul style="list-style-type: none"> <li>- ongoing work with or supporting Engagement Group partners;</li> <li>- promotion of Freedom Acts #Five Campaign;</li> <li>- engagement with homeless sector to raise awareness of risk and of indicators and reporting;</li> <li>- use of on-line social media to mitigate against vulnerability to trafficking and modern slavery.</li> </ul>	<ul style="list-style-type: none"> <li>- ongoing work with or supporting Engagement Group partners;</li> <li>- use of on-line social media to mitigate against vulnerability to trafficking and modern slavery.</li> </ul>
Strengthen resilience against modern slavery	<ul style="list-style-type: none"> <li>- engagement with relevant sectors, and identification of further sectors for engagement;</li> <li>- development and delivery of training and awareness initiatives;</li> <li>- ongoing delivery of Stronger Together initiative;</li> </ul>	

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

## Response Questionnaire

## DRAFT MODERN SLAVERY STRATEGY 2018 - 2019 – CONSULTATION

**RESPONDING TO THE CONSULTATION**

The Department of Justice (DOJ) is seeking your views on a draft Modern Slavery Strategy 2018 - 2019. The draft strategy aims to further strengthen the fight to eradicate human trafficking and slavery in all its forms, from Northern Ireland. It builds on the work of previous strategies and sets out an ambitious programme for the future.

Please use this questionnaire to tell us your views on the draft strategy.

Please send your response **no later than 5pm on Thursday 18 October 2018**, to:

**Department of Justice**

Organised Crime Branch  
Protection and Organised Crime Division  
Castle Buildings  
Stormont Estate  
BELFAST  
BT4 3SG

Tel: 028 90 523108

E-mail: [OCB.enquiries@justice-ni.x.gsi.gov.uk](mailto:OCB.enquiries@justice-ni.x.gsi.gov.uk)

Please note that responses to this consultation will be subject to the Freedom of Information Act 2000, which gives the right of access to much of the information held by public authorities. Before you submit your response, please read the advice in **Annex C** of the consultation document about the effect of the Freedom of Information Act 2000 on the confidentiality of responses to public consultation exercises.

Before you submit a response, please also read the Privacy Notice at **Annex D** of the consultation document which shows how we will use personal information as part of the processing of consultation responses.

Contact name:

Name and address of organisation:

E-mail address:

**Q1. Do you consider the draft Strategic Priorities of PURSUE, PROTECT AND PREVENT to be the appropriate ones for this strategy?**

**Response: YES/NO**

**Q2. Have you any other comments or suggestions on the Strategic Priorities?**

**Response:**

**Q3. In general, do you consider that the measures proposed under PURSUE are the appropriate ones?**

**Response: YES/NO**

**Q4. Are there any measures under PURSUE that you believe should be added or omitted (please provide reasons)?**

**Response:**

**Q5. In general, do you consider that the objectives, actions and delivery mechanisms proposed under PURSUE are the appropriate ones?**

Response: YES/NO

**Q6. Do you have any further comments or suggestions for additions or omissions under PURSUE?**

Response:

**Q7. In general, do you consider that the measures proposed under PROTECT are the appropriate ones?**

Response: YES/NO

**Q8. Are there any measures under PROTECT that you believe should be added or omitted (please provide reasons)?**

Response:

**Q9. In general, do you consider that the objectives, actions and delivery mechanisms proposed under PROTECT are the appropriate ones?**

Response: YES/NO

**Q10. Do you have any further comments or suggestions for additions or omissions under PROTECT?**

Response:



**Q11. *In general, do you consider that the measures proposed under PREVENT are the appropriate ones?***

**Response:** YES/NO

**Q12. *Are there any measures under PREVENT that you believe should be added or omitted (please provide reasons)?***

**Response:**

**Q13. *In general, do you consider that the objectives, actions and delivery mechanisms proposed under PREVENT are the appropriate ones?***

**Response:** YES/NO

**Q14. *Do you have any further comments or suggestions for additions or omissions under PREVENT?***

**Response:**

**Q15. *Please provide any other comments which you wish to make on the draft strategy.***

**Response:**

## **FREEDOM OF INFORMATION ACT 2000 – CONFIDENTIALITY OF CONSULTATIONS**

The Department intends to publish a summary of responses following completion of the consultation process.

Your response, and all other responses to the consultation, may also be disclosed on request. The Department can only refuse to disclose information in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this public consultation.

Subject to certain limited provisos, the Freedom of Information Act gives members of the public a right of access to any information held by a public authority, in this case, the Department. This right of access to information includes information provided in response to a consultation.

The Department cannot automatically consider as confidential information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity should be made public or be treated as confidential.

This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- ❖ the Department should only accept information from third parties “in confidence” if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided;
- ❖ the Department should not agree to hold information received from third parties “in confidence” which is not confidential in nature;
- ❖ acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

Further information about confidentiality of responses is available by contacting the Information Commissioner's Office (or at <https://ico.org.uk>).

## Privacy Notice

Data Controller Name: Department of Justice  
Address: Department of Justice, Castle Buildings, Stormont Estate, BELFAST, BT4 3SG  
Telephone: 02890 378617  
Email: [FOI@justice.x.gsi.gov.uk](mailto:FOI@justice.x.gsi.gov.uk)

Data Protection Officer Name: DOJ Data Protection Officer  
Telephone: 02890 378617  
Email: [DataProtectionOfficer@justice-ni.x.gsi.gov.uk](mailto:DataProtectionOfficer@justice-ni.x.gsi.gov.uk)

### Why are you processing my personal information?

- DOJ is seeking comments from interested parties as part of its public consultation on the draft Modern Slavery Strategy 2018- 2019. DOJ is not seeking personal data as part of the consultation but is likely to receive names and addresses/e-mail addresses as part of a consultee's response.
- Consultation is a requisite part of the development of public policy and strategy.
- ***ONLY if you are relying on consent to process personal data.***

DOJ is not relying on consent for processing the data supplied by the applicant. DOJ is required to seek consultation responses as part of policy development.

### What categories of personal data are you processing?

- Responses to the consultation will include names and addresses and/or e-mail addresses.

### Where do you get my personal data from?

- The personal data will originate from the person responding to the consultation.

### Do you share my personal data with anyone else?

- We will not share your personal data with other organisations.

### Do you transfer my personal data to other countries?

- No.

### How long do you keep my personal data?

- We will retain your data in line with 5.7 of Schedule 5 of the DOJ Retention and Disposal Schedule (<https://www.justice-ni.gov.uk/publications/doj-retention-and-disposal-schedule> ).

**(If you use automated decision making or profiling) How do you use my personal data to make decisions about me?**

- DOJ will not use automated processing for responses to this consultation.

**What rights do I have?**

- You have the right to obtain confirmation that your data is being [processed, and access to your personal data](#)
- You are entitled to have personal data [rectified if it is inaccurate or incomplete](#)
- You have a right to have personal data erased and to prevent processing, [in specific circumstances](#)
- You have the right to ‘block’ or suppress processing of personal data, [in specific circumstances](#)
- You have the right to data portability, [in specific circumstances](#)
- You have the right to object to the processing, in specific circumstances
- You have rights in relation to [automated decision making and profiling](#)

**How do I complain if I am not happy?**

Complaints should be submitted to:

Freedom of Information Unit  
Department of Justice  
Castle Buildings  
Stormont Estate  
BELFAST BT4 3SG

Telephone: 02890 378617

Email: [FOI@justice.x.gsi.gov.uk](mailto:FOI@justice.x.gsi.gov.uk)

**If you are unhappy with any aspect of this privacy notice, or how your personal information is being processed, please contact the *Departmental Data Protection Officer* at: [DataProtectionOfficer@justice-ni.x.gsi.gov.uk](mailto:DataProtectionOfficer@justice-ni.x.gsi.gov.uk)**

**If you are still not happy, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO):**

**Information Commissioner’s Office**  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

<https://ico.org.uk/global/contact-us/>