



Department of

Justice

www.dojni.gov.uk

Building a fair, just and safer community

A DEPARTMENT OF JUSTICE CONSULTATION

DRAFT NORTHERN IRELAND HUMAN TRAFFICKING AND EXPLOITATION STRATEGY 2015/16

29 June 2015

RESPONDING TO THIS CONSULTATION

- i. An electronic version of this document is available in the consultation section of the Department of Justice website (www.dojni.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 htconsultation@dojni.x.gsi.gov.uk or posted to the following address:
Human Trafficking Team
Protection and Organised Crime Division
Department of Justice
Room B4.20
Castle Buildings
Stormont Estate
Belfast
BT4 3SG
Telephone: 028 9052 0759
Textphone: 028 9052 7668
- iv. **The closing date for this consultation is 21 August 2015.**
- 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.

TABLE OF CONTENTS

	Page number
1. Introduction	4
2. Impact assessments	7
3. Summary of targeted consultation	8
4. Queries or concerns	10
5. Annex A – Draft Northern Ireland Human Trafficking and Exploitation Strategy 2015/16	11
6. Annex B – Response questionnaire	44

1. INTRODUCTION

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 the work that has already been progressed under the 2013/14 and 2014/15 human trafficking action plans for Northern Ireland. Progress reports against these previous action plans can be found at:

<http://www.dojni.gov.uk/northern-ireland-human-trafficking-action-plan-2013-14-progress-report>

<http://www.dojni.gov.uk/northern-ireland-human-trafficking-and-slavery-action-plan-2014-15>

Purpose of strategy

1.4 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.

1.5 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.

1.6 The draft strategy has been developed to ensure that these issues are addressed and has also been informed by:

- the Whitehall Modern Slavery Strategy for the United Kingdom;
- the EU Strategy towards the Eradication of Trafficking in Human Beings 2012 – 2016; and
- the OCTF strategic profile report (February 2015) on potential victims of human trafficking in Northern Ireland.

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

Strategic aim and priorities

1.8 Following engagement with key stakeholders we have identified an overarching strategic aim: *“To equip Northern Ireland to drive out human trafficking, slavery and forced labour”*.

1.9 This aim is underpinned by four strategic priorities:

- Pursue (effective detection, disruption, investigation and prosecution of offenders);
- Protect and support (provision of effective protection and support and improved identification of victims);
- Prevent (prevent and reduce risk of human trafficking and exploitation in Northern Ireland); and
- Partnership (effective partnership response to human trafficking and exploitation).

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 2015/16.

1.11 We welcome 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 our key partners and stakeholders we want to ensure that other individuals and organisations are afforded an opportunity to comment on the draft and 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 slavery-like 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 21 August.

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 anticipate that the final strategy will be published by early October. 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

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 slavery-like offences. It will facilitate effective investigations and prosecutions and will help 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, however, 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

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
- 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
- Designate Independent Anti-Slavery Commissioner
- Attorney General
- Law Society
- Bar Council

4. QUERIES OR CONCERNS

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:

Peter Grant
Department of Justice
Central Co-ordination Branch
Central Management Unit
Knockview Buildings
Stormont Estate
Belfast

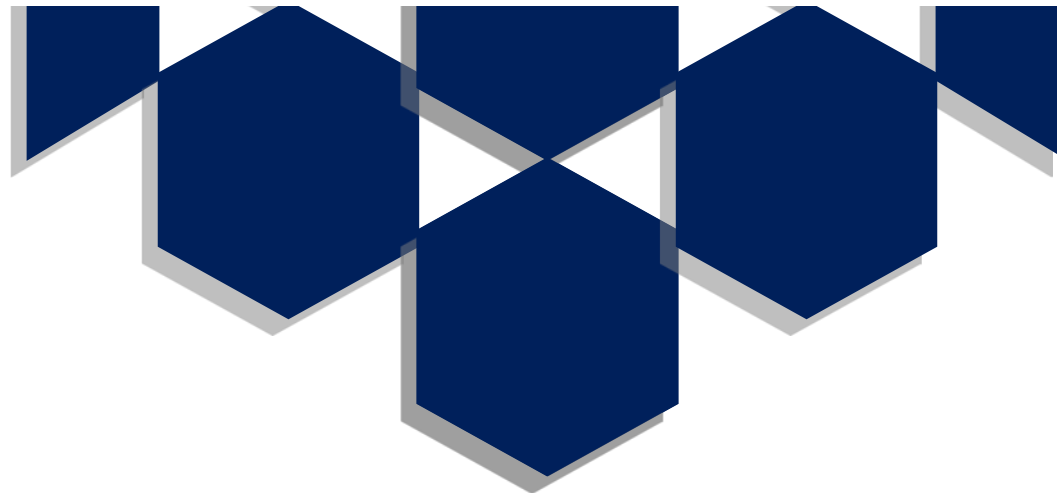
E-mail: peter.grant@dojni.x.gsi.gov.uk

Telephone 028 9076 5138

Text phone: 028 9052 7668



**DRAFT NORTHERN IRELAND HUMAN TRAFFICKING
AND EXPLOITATION STRATEGY 2015/16**



Department of
Justice
www.dojni.gov.uk



**ORGANISED
CRIME
TASK FORCE**

1. FOREWORD



I am pleased to publish the first annual Human Trafficking and Exploitation Strategy for Northern Ireland, in line with section 12 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.

The strategy builds on the Human Trafficking and Exploitation Action Plans for Northern Ireland that have been produced over the last two years, which have helped to set a clear strategic direction for my Department and its partners.

Human trafficking and practices such as slavery and forced labour – so-called “modern slavery” - are life shattering crimes that degrade and dehumanise innocent men, women and children. To traffickers, victims are not seen in terms of their humanity, but only in terms of what profit they can bring as commodities. Tackling these offences and the people who perpetrate them is a priority for me and for my Department.

This strategy includes a raft of challenging and targeted actions that my Department and its partners are committed to delivering over the next twelve months.

Partnership is a key thread running through this strategy. We cannot do this alone. I greatly value the eagerness of our strategic partners, both statutory and non-statutory, to work collaboratively in a joined-up and effective manner. It is only through working together that we will be able to bring these crimes out of the shadows and bring perpetrators to justice.

The strategy has been developed around four strategic priorities which, together, provide the focus for our collective work. These priorities are:

1. Pursue (*effective detection, disruption, investigation and prosecution of offenders*);

2. Protect and support (*protection and support for and improved identification of victims*);
3. Prevent (*prevent and reduce risk of human trafficking and exploitation in Northern Ireland*);
4. Partnership (*effective joined-up response to human trafficking and exploitation*).

DAVID FORD MLA

Minister of Justice

I believe that this strategy and the objectives and actions underpinning it reinforce Northern Ireland's defences against these appalling crimes. It will facilitate effective investigations and prosecutions and will help to ensure that victims are identified, protected and supported.

Section 12 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 requires my Department to refresh this strategy on an annual basis.

This will ensure that the strategy remains relevant and that the response to tackling human trafficking and exploitation will continue to strengthen.

2. INTRODUCTION

This strategy was developed by the Department of Justice in collaboration with its civil society partners on the Department's Human Trafficking Engagement Group and statutory partners on the Organised Crime Task Force's (OCTF) Immigration and Human Trafficking Subgroup.

In line with section 12 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 ("the 2015 Act), the purpose of this 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. In doing so, it also seeks to improve victim identification and recovery and ensure that victims can have access to adequate protection and support.

Under section 12 of the 2015 Act the strategy is required to:

- set out arrangements for co-operation between relevant organisations;

- 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 actively involved in tackling human trafficking and exploitation in Northern Ireland;
- measures and requirements under the 2015 Act and the Modern Slavery Act 2015;
- the Home Secretary's Modern Slavery Strategy;
- the EU Strategy towards the Eradication of Trafficking in Human Beings 2012-2016; and
- the OCTF strategic profile report on potential victims of human trafficking recovered in Northern Ireland (April 2009 to August 2013).

This strategy is underpinned by a range of SMART actions which clearly set out the work that the Department of Justice and its partners intend to deliver during 2015/16.

DRAFT

3. **BACKGROUND**

3.1 **“MODERN SLAVERY” IN NORTHERN IRELAND**

Human trafficking and slavery, servitude and forced or compulsory labour are largely hidden crimes, which makes it difficult to establish an accurate assessment of the nature and extent of the problem in Northern Ireland.

Scale

Our most reliable information is taken from the United Kingdom Human Trafficking Centre’s analysis of cases that have been referred to the National Referral Mechanism (NRM). The NRM is the United Kingdom’s national process for identifying victims of human trafficking and ensuring that they receive appropriate protection and support. In addition, The OCTF has conducted research on potential victims of human trafficking who were referred into the NRM from Northern Ireland between April 2009

and August 2013. The key findings from this research were published in February 2015¹.

During 2014 **2,340 potential victims** of “modern slavery” were referred to the National Referral Mechanism (NRM) in the United Kingdom so that their cases could be assessed. **45 of these potential victims** were referred to the NRM from Northern Ireland (16 females and 29 males). This compares to 41 potential victims referred from Northern Ireland in 2013.

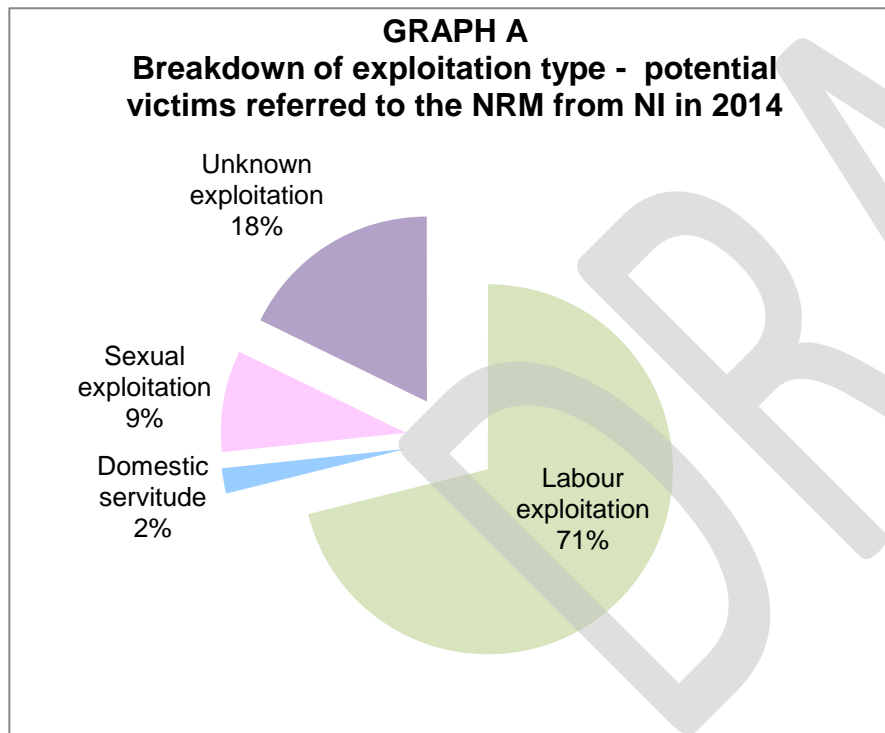
Exploitation type

Graph A provides a breakdown of the 45 potential victims recovered in Northern Ireland during 2014 according to exploitation type.

Of these, 33 (73%) individuals in 2014 were referred in connection with labour exploitation or domestic servitude. 22 of these potential victims were recovered as part of a single PSNI operation.

¹ <http://www.octf.gov.uk/Publications/Human-Trafficking/OCTF-report-on-potential-victims-of-trafficking-in.aspx>

The prevalence of labour exploitation last year marked a departure from previous years, where sexual exploitation had been the most common exploitation type. The OCTF's the strategic profile of potential victims of human trafficking recovered in Northern Ireland (April 2009 to August 2013) found that 49% (48 out of 97) of the potential victims had been trafficked for sexual exploitation.



In the case of eight of the potential victims referred in 2014 the exploitation type is recorded as unknown. In these cases, the person may have been recovered before the exploitation took place.

Our strategic response has been informed by these trends. In recognition of emerging issues around forced labour in Northern Ireland, the strategy includes specific objectives and actions that are intended to raise awareness and reduce the risk of labour exploitation, whilst still maintaining a focus on other exploitation types.

Age of potential victims

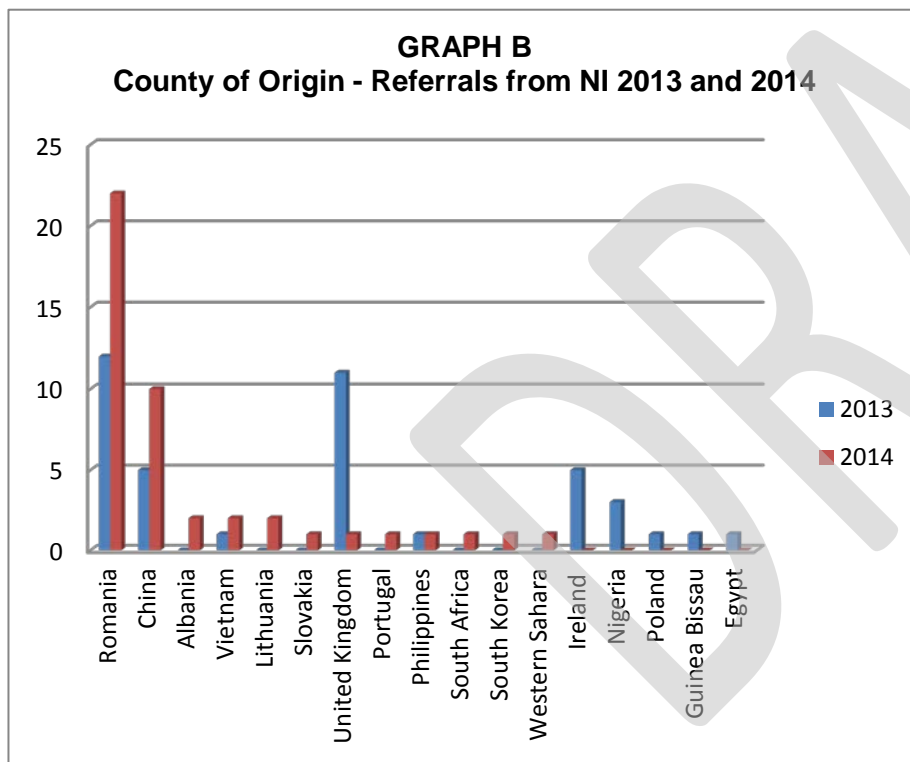
37 (82%) of the potential victims recovered in 2014 were adults and 8 (18%) were minors.

The OCTF's wider strategic profile of potential victims indicates an age range which spans six decades, the youngest at only three years old to the oldest at almost 60 years old.

In response, we have sought to ensure that the strategy includes actions which focus on both adult and child victims.

Nationality of potential victims

Graph B shows the country of origin of potential victims who were referred to the NRM from Northern Ireland during 2013 and 2014.



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.

In 2013, Operation Owl (a PSNI investigation into child sexual exploitation) led to a significant increase in referrals of sexual exploitation cases of UK and Irish nationals. This strategy reflects a number of actions that will be driven forward through the Department’s Tackling Child Sexual Exploitation in Northern Ireland Action Plan.

The OCTF’s strategic profile report indicated that mainland Great Britain and Ireland are key transit countries for potential victims who have been recovered in Northern Ireland. Only a small number of potential entered Northern Ireland directly from outside the United Kingdom and Ireland and in these cases Spain and Holland have been identified as key transit countries.

Recruitment methods

The OCTF's strategic profile report found that the majority of potential victims recovered in Northern Ireland were recruited within their home country. Around 20 potential victims were recruited in the United Kingdom or Ireland (either because they were United Kingdom or Irish nationals, or because they had previously travelled there of their own volition). A number of recruitment methods were identified:

- *Job advertisements* – Around a quarter (26%) of potential victims indicated that they had been trafficked after applying for what they thought was a legitimate job.
- *Approaches made by individual 'recruiters'* – Around 14% of potential victims described being approached by individuals who promised them work.
- *'Lover boy'* – Around 8% of potential victims described the 'lover boy' approach, a recognised method of luring young girls into sexual exploitation.
- *Kidnapped or sold* – Around 8% of potential victims described being kidnapped or 'sold' by a family member.

Key vulnerabilities

The strategic profile report also identified a range of key factors that appear consistently in the case studies which serve to heighten the vulnerability of the victims.

- In several cases the victim had been orphaned or had been affected by illness within their family. In these cases, some had been forced to find work to support themselves, others had gone to live with family or friends and had subsequently been 'sold'.
- A number of individuals were in debt in their home country and initially travelled willingly in the belief that they were going to be offered legitimate work.
In some cases individuals seeking work had been targeted outside job centres only to find themselves then compelled to work against their will.
- There were also a number of cases involving the internal trafficking of minors for sexual exploitation, many of whom had been within the care system.

Prosecutions

To date, three convictions have been secured in Northern Ireland's courts for offences of human trafficking. A confiscation Order was obtained in respect of one of those convicted in Northern Ireland for Human Trafficking in the sum of £68,018.00.

In addition, following consultation with PSNI and Public Prosecution Service for Northern Ireland (PPS), two persons were prosecuted and convicted in Scotland for trafficking offences that also covered activities in Northern Ireland.

In 2013, an investigation into an organised crime group suspected of involvement in controlling prostitution and human trafficking in Northern Ireland and Sweden took place. This was facilitated by a Joint Investigation Team (JIT) agreement between the PSNI and PPS in Northern Ireland and the prosecution authorities in Sweden. Two defendants were convicted in Sweden. A file is currently with PPS to determine if prosecutions will also take place in Northern Ireland.

PPS has advised that there are a number of cases which are still under consideration.

A number of other convictions have also been secured for related offences such as brothel keeping, controlling prostitution for gain and entering into an arrangement to control criminal property.

3.2 THE LEGISLATIVE FRAMEWORK

Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015

The legislative framework around human trafficking and slavery, servitude and forced or compulsory labour has undergone significant reform. 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 enhances 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 2 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.

The majority of provisions in the Act came into force upon Royal Assent. This strategy also includes a number of specific actions to implement the remaining provisions.

Modern Slavery Act 2015

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, the strategy includes a number of actions to implement these new provisions.

3.3 IDENTIFYING VICTIMS

The National Referral Mechanism (NRM) is 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 (adults need to consent to a referral).

Once a referral has been made, a Competent Authority (currently the UK Human Trafficking Centre (UKHTC) in all EEA cases and UK Visas and Immigration (UKVI) in non-EEA cases) assesses the case to determine if the person has been trafficked. There are currently two stages:

- Within five days - an assessment as to whether there are reasonable grounds to believe that the individual is a victim of human trafficking.
- Then, within 45 days a Conclusive Determination that the individual either is or is not a victim of human trafficking.

In Northern Ireland, a potential victim referred to the NRM is entitled to assistance and support until either:

- there is a determination that there are not reasonable grounds to believe the individual is a victim of trafficking; or
- there is a conclusive determination, either way, about whether the person is or is not a victim of trafficking.

In addition, where an individual is determined to be a victim, the support and assistance continues to be made available during the “recovery and reflection period”, which lasts for 45 days from the point that it is assessed that there are reasonable grounds to believe the individual is a victim.

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.

The support includes: 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 Health, Social Services and Public Safety (DHSSPS) provides appropriate support for adults who have been

confirmed as victims through the NRM, subject to their leave to remain in Northern Ireland. Support and protection for child victims are also the responsibility of DHSSPS.

The NRM system is currently subject to a major review which has made recommendations for significant changes that are intended to improve effectiveness and outcomes for victims. The Home Secretary, who retains ultimate responsibility for the NRM, has accepted these recommendations in principle, subject to piloting.

The DOJ and its partners are now working through the detail of how the report should be implemented within Northern Ireland and this work has been reflected through actions in this strategy.

3.4 PROGRESS TO DATE

Strong partnerships are in place between relevant statutory agencies and Non-Governmental Organisations working the field. There are two main strategic partnership groups within Northern Ireland:

- the **Organised Crime Task Force's** (OCTF) Immigration and Human Trafficking subgroup, which brings together the main statutory bodies with responsibilities around tackling trafficking. These include PSNI, PPS, the Department of Health, Social Services and Public Safety (DHSSPS), the Health and Social Care Board, Home Office, National Crime Agency, Border Force and An Garda Síochána. The subgroup is focussed on providing strategic direction and resolving operational issues; and
- the **Engagement Group on Human Trafficking**, which facilitates a partnership approach and joint working amongst Government Departments, statutory bodies, voluntary and civil society organisations and other agencies.

The Department of Justice also works closely with other relevant Government Departments (both in Northern Ireland and other neighbouring jurisdictions) and with local Government.

Key achievements over the past two years include:

- the establishment of a new legislative framework;

- actions to promote education on human trafficking, including: the development of an education resource pack on human trafficking for teachers of Year 10 and Key Stage 4 (by Freedom Acts with DOJ support); and development of an education pack for primary schools (by Invisible Traffick);
- training provided to staff in statutory agencies e.g PSNI and PPS and to civil society groups working in the field;
- targeted engagement with key sectors, for example prison officers; landlords; midwives; ambulance teams; Border Force agents; airport staff; social workers; GP surgeries; pharmacies; Registrars; legal professionals; probation officers; youth workers; Council staff and City Centre retailers, hotels, B+B's and taxi drivers.
- raising public awareness including through:

- the Modern slavery media campaign and helpline;
- the UN Gift Box; and
- events to mark EU Anti Trafficking Day.

Progress reports against the 2013/14 and 2014/15 Human Trafficking Action Plans for Northern Ireland can be found at:

- <http://www.dojni.gov.uk/northern-ireland-human-trafficking-action-plan-2013-14-progress-report>
- <http://www.dojni.gov.uk/northern-ireland-human-trafficking-and-slavery-action-plan-2014-15>

4. STRATEGIC PRIORITIES

The overall aim of this strategy is: *“To equip Northern Ireland to drive out human trafficking, slavery and forced labour.”*

In order to achieve this aim, four strategic priorities have been identified. These are set out below and are underpinned by key objectives and SMART actions that the DOJ and its partners intend to deliver during 2015-16.

Strategic priority 1 – Pursue

This is about:

- strengthening law enforcement to ensure victims are recovered;
- disrupting trafficking and slavery-like practices;
- assisting effective investigations and prosecutions;
- ensuring fit for purpose sentencing; and
- enhancing public protection.

Strategic priority 2 – Protect and support

This is about:

- ensuring appropriate support for potential victims;
- ensuring that victims’ rights and interests are protected and upheld; and
- improving victims’ confidence in, and willingness to engage with, the criminal justice system.

Strategic priority 3 – Prevent

This is about:

- reducing the risk of people being drawn into trafficking/slavery/forced labour;
- improving public capacity to report suspicions and incidents;
- making Northern Ireland a less attractive destination for traffickers/enslavers.

Strategic priority 4 - Partnership

This is about:

- reducing duplication;
- working effectively together;
- better use of limited resources; and
- developing an informed strategic and operational response.

Strategic Aim:

Equipping Northern Ireland to drive out human trafficking, slavery and forced labour

Strategic priority 1: Pursue

Effective detection, disruption, investigation and prosecution of offenders

Objectives:

- Bring forward secondary legislation to implement the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015;
- Implement provisions in the Modern Slavery Act 2015 which extend to Northern Ireland;
- Improve the gathering and sharing of intelligence and ensure effective analysis;
- Effective investigations and prosecutions;
- Effective training for law enforcement;
- Enhance public protection;
- Pursue criminal finances of traffickers and enslavers;
- Enhance understanding of online recruitment; and
- Effective cross-border and international police collaboration.

Strategic priority 2: Protect and Support

Provision of effective protection and support and improved identification of victims

Objectives:

- Improve victim identification and support;
- Protect and deliver support services to potential victims going through the NRM process;
- Protect and support victims through the criminal justice system;
- Raise awareness of the rights and entitlements of victims;
- Provide protection and support services to children;
- Appropriate access to legal representation;
- Appropriate access to compensation services; and
- Reinforce capacity to respond to major human trafficking or slavery-like incidents.

Strategic priority 3: Prevent

Prevent and reduce risk of human trafficking and exploitation in Northern Ireland

Objectives:

- Continued engagement with at-risk groups;
- Raising public awareness of the signs and indicators of human trafficking, slavery and forced labour;
- Targeted engagement and awareness raising with key sectors;
- Engagement with the private sector to increase knowledge and understanding of human trafficking, slavery and forced labour;
- Understand and reduce demand for the services of trafficked and exploited people; and
- Capture learning over time.

Strategic priority 4: Partnership

Effective partnership working, identification of best practice and lessons learned

Objectives:

- Cooperation between relevant statutory agencies;
- Cooperation and coordination between Government and civil society;
- Appropriate information sharing;
- Effective cross-border cooperation;
- Strategic alignment with other UK jurisdictions;
- Engagement with the UK Independent Anti-Slavery Commissioner; and
- Building strong pan-European links.

STRATEGIC PRIORITY 1: PURSUE-

Effective detection, disruption, investigation and prosecution of offenders

No.	OBJECTIVE	PROJECTED OUTCOMES	ACTIONS	TARGET DATE	OWNER
1	Bring forward secondary legislation to implement the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.	<ul style="list-style-type: none"> • Effective and robust criminal law provisions to facilitate investigations and prosecutions; • Robust sentencing framework in place for judges to work within; • Enhanced public protection. 	Commence remaining provisions in the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.	Autumn 2015	DOJ
			Prepare an Order under section 11/Schedule 3 (Slavery and Trafficking Prevention Orders) to ensure that GB offences and prevention orders are captured by the NI legislation.	Autumn 2015	DOJ
			Prepare regulations under section 11/Schedule 3 (Slavery and Trafficking Prevention Orders) for offenders' travelling outside the UK and other miscellaneous matters.	Autumn 2015	DOJ
			Prepare an order under section 13 (Duty to notify) to ensure that notifications are made to Home Secretary, in line with Modern Slavery Act 2015.	Autumn 2015	DOJ
			Prepare regulations under section 13 (Duty to notify)	Autumn 2015	DOJ

No.	OBJECTIVE	PROJECTED OUTCOMES	ACTIONS	TARGET DATE	OWNER
			specifying public authorities to which the duty applies and information to be included in a notification.		
			Ensure there is appropriate guidance in place for PSNI in relation to new operational powers.	Autumn 2015	DOJ/PSNI
2	Implement provisions in the Modern Slavery Act 2015 which extend to Northern Ireland.	<ul style="list-style-type: none"> • Effective and robust criminal law provisions to facilitate investigations and prosecutions; • Robust sentencing framework in place for judges to work within; • Enhanced public protection. 	Commence provisions relating to: Maritime enforcement; Transparency in Supply Chains and; the Independent Anti-Slavery Commissioner.	Autumn 2015	DOJ/Home Office
			Prepare a Code of Practice under section 37/Schedule 2 for PSNI on use of new maritime enforcement powers in NI waters.	Autumn 2015	DOJ
			Ensure effective accountability arrangements for maritime enforcement powers to facilitate cross-jurisdictional cooperation.	Autumn 2015	DOJ
			Prepare regulations under section 43 (Duty to cooperate with Commissioner) to specify authorities in Northern Ireland which must cooperate with the Commissioner and amend how the duty applies, if necessary.	Autumn 2015	DOJ
3	Improve the gathering and	<ul style="list-style-type: none"> • Clearer understanding of the 	Ensure administrative	March 2016 (dependent on	Home

No.	OBJECTIVE	PROJECTED OUTCOMES	ACTIONS	TARGET DATE	OWNER
	sharing of intelligence and ensure effective analysis.	<p>nature and scale of human trafficking and exploitation;</p> <ul style="list-style-type: none"> Improved operational response; Support effective investigations and prosecutions. 	<p>arrangements are in place to implement the statutory duty to report.</p> <p>Scope the potential for European information sharing.</p> <p>Development of formal MOUs with AGS and NCA.</p> <p>Continued meetings of the OCTF Immigration and Human Trafficking Subgroup</p> <p>Migrant Help, Migration Research (UK-IMR) and DOJ to discuss possible data sharing agreement on human trafficking.</p> <p>Monitor National Crime Agency (NCA) statistics on an ongoing basis.</p> <p>Provide management information on NI calls to the Modern Slavery Helpline.</p> <p>Development of Memorandum of Understanding for the exchange of operational learning in order to identify cases of trafficking / forced labour, ensuring all cases are recorded in order to identify trends.</p>	<p>Home Office timings).</p> <p>October 2015</p> <p>October 2015</p> <p>Ongoing</p> <p>July 2015</p> <p>Ongoing</p> <p>Ongoing</p> <p>December 2015</p>	<p>Office/DOJ/specified public authorities</p> <p>PSNI</p> <p>PSNI</p> <p>DOJ</p> <p>Migrant Help, UK-IMR and DOJ.</p> <p>DOJ</p> <p>NSPCC</p> <p>GLA, PSNI and DEL EIA</p>
4	Effective investigations and prosecutions.	<ul style="list-style-type: none"> Increased recovery of victims; Disruption of trafficking and 	Development of a full-time PSNI investigation team led by a dedicated D/Inspector.	June 2015	PSNI

No.	OBJECTIVE	PROJECTED OUTCOMES	ACTIONS	TARGET DATE	OWNER
		slavery-like practices; <ul style="list-style-type: none"> • Traffickers and enslavers receiving appropriate punishments. 	PPS to continue to provide prosecutorial advice to PSNI and to facilitate early engagement with PSNI to improve effectiveness of investigations and prosecutions.	Ongoing	PPS and PSNI
			Develop Memoranda of Understanding with An Garda Síochána and with the Irish National Employment Rights Authority (NERA).	December 2015	GLA
5	Effective training for law enforcement.	<ul style="list-style-type: none"> • Increased capacity to identify cases of human trafficking /slavery/forced labour; • Effective and skilled response; • Effective investigations and prosecutions; • Improved multi-agency response. 	Dedicated PSNI to receive appropriate internal PSNI training, cross-border training with AGS and national HT training when available through CoP.	Ongoing	PSNI
			PPS to continue to identify training needs and provide appropriate training to prosecutors as required.	Ongoing	PPS
6	Enhance public protection.	<ul style="list-style-type: none"> • Protection of those vulnerable to being trafficked or enslaved; • Appropriate sentences for traffickers/enslavers; • Reduced likelihood of those convicted of trafficking or slavery –like offences reoffending. 	Ensure appropriate use of applications for Slavery and Trafficking Prevention Orders (STPOs) where necessary.	Autumn 2015	PSNI
7	Pursue criminal finances of traffickers and enslavers.	<ul style="list-style-type: none"> • Enhanced reparation for victims; • Reduced profit motivation. 	PPS to continue to apply for restraint and confiscation of criminal assets in appropriate	Ongoing	PPS

No.	OBJECTIVE	PROJECTED OUTCOMES	ACTIONS	TARGET DATE	OWNER
			cases.		
8	Enhance understanding of online recruitment.	<ul style="list-style-type: none"> • Improved understanding of how people get drawn into trafficking and slavery/forced labour; • Informed investigations; • Greater victim identification. • • 	Development of understanding of online recruitment.	November 2015	PSNI
9	Effective cross-border and international police collaboration.	<ul style="list-style-type: none"> • Disruption of international crime gangs; • Sharing of best practice and intelligence; • Joint operations; • Increased prosecutions. 	Joint PSNI / An Garda Síochána training.	November 2015	PSNI
			Implementation of Joint Investigation Teams with other European Member States where appropriate	Ongoing	PSNI
			Implement actions in the cross border policing strategy.	March 2016	PSNI and AGS

STRATEGIC PRIORITY 2: PROTECT AND SUPPORT-

Provision of effective protection and support and improved identification of victims

No.	OBJECTIVE	PROJECTED OUTCOMES	ACTIONS	TARGET DATE	OWNER
1	Improve victim identification and support.	<ul style="list-style-type: none"> Victims removed from trafficking/slavery-like situations and offered protection/support; Increased prosecutions. 	Provision of appropriate training for First Responders.	December 2015	DOJ
			Ensure effective NRM arrangements are in place in Northern Ireland, including participation in the ongoing review of the NRM.	Ongoing	DOJ and Home Office
			Immigration and Enforcement staff to undertake refreshed e-learning training on identifying and responding to cases of human trafficking.	March 2016	Home Office Immigration Enforcement
2	Protect and deliver support services to potential adult victims going through the NRM process.	<ul style="list-style-type: none"> Potential victims receiving appropriate support; Compliance with requirements under EU Directive and Human Trafficking and Exploitation Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. 	Ensure delivery of services under DOJ's contracts with Migrant Help and Women's Aid to adult potential victims of human trafficking during the NRM's Recovery and Reflection period.	Ongoing	DOJ

			Evaluate support service contract.	July 2015	DOJ (Community Safety Unit)
			Contribute to the development of relevant protocols and practices to ensure safe and secure provision of support services to potential adult victims of human trafficking.	Ongoing	DOJ and PSNI
3	Protect and support victims through the criminal justice system.	<ul style="list-style-type: none"> Victims' rights and interests protected and upheld; Victim confidence in and willingness to engage with criminal justice system; Effective prosecution of perpetrators; Prevention of secondary victimisation. 	Ensure that victims of human trafficking who are assisting with criminal investigations can avail of the discretionary leave scheme where appropriate/ necessary.	Ongoing	PSNI
			Measures in place to avoid secondary victimisation during the criminal justice process.	Ongoing	PSNI
			Ensure that appropriate information is provided to victims and witness as cases progress and ensure that needs assessments are carried out at appropriate stages to determine whether victims require any specific assistance to enable them to participate in criminal proceedings or special measures to assist victims to give their best evidence.	Ongoing	PPS and PSNI
			Complete consultation on revisions to industrial tribunal and Fair Employment Tribunal rules and procedures.	May 2015	DEL
4	Raise awareness of the rights and entitlements of victims.	<ul style="list-style-type: none"> Victims aware of the 	Ensure multi-lingual leaflets for victims are widely accessible.	Ongoing	DOJ / Engagement

		<p>support available;</p> <ul style="list-style-type: none"> • Address victims' concerns and reduce vulnerability; • Frontline practitioners able to advise victims of their rights and entitlements. 			Group
			Information, guidance and support signposted through the DOJ-funded support services to potential victims of human trafficking.	Ongoing	DOJ through service providers Migrant Help and Women's Aid
			Brief relevant members of the legal profession.	December 2015	DOJ
5	Provide protection and support services to children.	<ul style="list-style-type: none"> • Child potential victims and victims are appropriately protected and supported. 	Ongoing support for child victims and suspected child victims of human trafficking to fulfil obligations under the Children (Northern Ireland) Order 1995.	Ongoing	DHSSPS
			DHSSPS to consult on draft Human Trafficking and Exploitation (Criminal Justice and Support for Victims) (Independent Guardian) Regulations (Northern Ireland) 2015. Following consultation, the Regulations will be finalised, made and laid before the Assembly.	31 March 2016	DHSSPS

			Continue to work as a member of the regional network on trafficking making specialist services available as required through our consultant social worker (as assisted by CTAC).	Ongoing	NSPCC
			Child Trafficking Advice Centre (CTAC) to provide an advice service to Health and Social Care and other professional staff in NI and further training on issues such as reunification of children to overseas countries.	Ongoing	NSPCC
			CTAC to provide a liaison role for staff needing information or assessments on the families of young people from overseas.	Ongoing	NSPCC
6	Appropriate access to legal representation.	<ul style="list-style-type: none"> • Clarity for victims on their rights; • Victims can avail of legal representation. 	Signposting of victims to legal representation through the DOJ contract.	Ongoing	Migrant Help and Women's Aid
			Legal aid available to trafficking or slavery victims.	Ongoing	DOJ
7	Appropriate access to compensation services	<ul style="list-style-type: none"> • Clarity for victims on how to apply for compensation; • Victims of human trafficking appropriately compensated; 	Completion of Post Consultation Report for the Review of the Criminal Injuries Scheme.	December 2015	Compensation Service (DOJ)

		<ul style="list-style-type: none"> Reduced vulnerability of victims. 	<p>Compensation Service to continue to record data on compensation claims in human trafficking cases (where this is known).</p>	Ongoing	Compensation Service (DOJ)
			<p>Issue a leaflet for victims of human trafficking on applying for compensation and also issue related draft guidance notes to assist victims of human trafficking in completing a personal injury application form.</p>	June 2015	Compensation Service (DOJ)
			<p>Migrant Help and Women's Aid to signpost victims to Victim Support NI.</p>	Ongoing	Migrant Help and Women's Aid
8	Reinforce capacity to respond to major human trafficking or slavery –like incidents.	Gaps identified during previous major incidents are addressed.	<p>Capture lessons learned from major operations.</p>	June 2015	DOJ, PSNI, GLA, Women's Aid, Migrant Help.
			<p>Migrant Help and Women's Aid to provide reports and analysis pertaining to care assistance provided post previous incidents on request.</p>	Ongoing	Migrant Help and Women's Aid

STRATEGIC PRIORITY 3: PREVENT-

Prevent and reduce risk of human trafficking and exploitation in Northern Ireland

No.	OBJECTIVE	PROJECTED OUTCOMES	ACTIONS	TARGET DATE	OWNER
1	Continued engagement with identified at-risk groups.	<ul style="list-style-type: none"> Reduced risk of people being drawn in to human trafficking or exploitation; Enhanced awareness of risk amongst identified groups; Greater protection for at-risk groups. 	Promotion of the “Women and Girls” strand of the Reach Project.	November 2015	DOJ and Engagement Group
			Engage with community groups representing minority ethnic groups.	March 2016	DOJ and Engagement Group
			Engage in workshops within Secondary Education, University/College Students Youth Clubs, Youth Events etc.	May /June 2015	Invisible Traffick
2	Raising public awareness of the signs and indicators of human trafficking and slavery-like offences	<ul style="list-style-type: none"> Greater awareness of: <ul style="list-style-type: none"> - the existence of human trafficking, slavery and forced labour in Northern Ireland - causes and impact; - indicators; - forms and types; and - how to respond and report. greater public capacity to report suspicions and incidences; reduction in demand; co-ordinated response by Government and NGOs; reduction in duplication; better use of limited resources. 	Organise a programme of actions/events to mark EU Anti-Trafficking Day.	October 2015	DOJ and Engagement Group
			Distribute materials from the Modern Slavery campaign e.g. posters for the general public and posters and factsheets for industry.	March 2016	DOJ and Engagement Group
			Continue to promote calls to the Modern Slavery Helpline.	Ongoing	NSPCC and DOJ
			Province wide Billboard and bus shelter advertising Campaign entitled “Slavery Near Your Door.”	Ongoing 2015	Invisible Traffick
			Identify high profile events to raise awareness at e.g. Mela and Balmoral Show.	Ongoing	DOJ and Engagement Group
			Continue to develop resources/materials to assist	Ongoing	Engagement Group

No.	OBJECTIVE	PROJECTED OUTCOMES	ACTIONS	TARGET DATE	OWNER
			and encourage the general public to spot the signs of human trafficking and report any suspicions.		
			Hold awareness events/briefing sessions for community/youth groups, churches and other relevant groups.	Ongoing	Engagement Group
			Distribution of Primary Education Pack for Key stage 1&2, to all Primary Schools throughout NI and devise a Schools Competition for Primary Schools that have received the pack.	Ongoing	Invisible Traffick
			Informed by SBNI, DOJ Human Trafficking Engagement Group will incorporate CSE, as appropriate, within wider work to raise awareness of human trafficking.	Ongoing	DOJ
3	Targeted engagement and awareness raising with key sectors	<ul style="list-style-type: none"> • Greater awareness of: • • ○ the existence of human trafficking and slavery-like offences in Northern Ireland ○ causes and impact ○ indicators ○ forms and types 	Further engagement with NIPS to raise awareness of human trafficking and slavery/forced labour amongst operational staff.	June 2015	DOJ and NIPS
			Write to Judicial Studies Board offering training on signs of human trafficking.	September 2015	DOJ

No.	OBJECTIVE	PROJECTED OUTCOMES	ACTIONS	TARGET DATE	OWNER
		<ul style="list-style-type: none"> ○ how to respond and report • increased capacity to report suspicions; • increased capacity to identify and recover victims. 	<p>DOJ to deliver awareness training on human trafficking to PCSPs that will cover human trafficking for the purposes of Child Sexual Exploitation.</p> <p>Run further ten briefing sessions for specified groups (dependent on funding.)</p> <p>Belfast PCSP to further distribute Human Trafficking "Toolkit".</p> <p>Continued awareness raising/training with key sectors such as:</p> <ul style="list-style-type: none"> • medical; • legal; • law enforcement; and • social work. <p>Continue to deliver GLA Prevention Plan within Northern Ireland.</p>	<p>Autumn 2015</p> <p>March 2016</p> <p>Ongoing</p> <p>Ongoing</p> <p>March 2016</p>	<p>DOJ</p> <p>DOJ</p> <p>Belfast PCSP</p> <p>Engagement Group</p> <p>GLA</p>
4	Engagement with the private sector to increase knowledge and understanding of human trafficking, slavery and forced labour	<ul style="list-style-type: none"> • Greater awareness of human trafficking, slavery and forced labour; • increased capacity to report suspicions; • increased capacity to identify and recover victims. 	<p>Joint DOJ and DEL seminar targeted at agencies and employers in sectors not covered by the GLA.</p> <p>Disseminate information to door supervisors through the Security Industry Authority.</p> <p>Continue to forge links with local businesses and deliver awareness sessions/materials.</p>	<p>January 2016</p> <p>June 2015</p> <p>Ongoing</p>	<p>DOJ and DEL</p> <p>DOJ</p> <p>No More Traffik</p>
5	Understand and reduce demand for the services of	<ul style="list-style-type: none"> • Greater awareness; 	Support "men and boys" strand of the REACH Project.	November 2015	DOJ

No.	OBJECTIVE	PROJECTED OUTCOMES	ACTIONS	TARGET DATE	OWNER
	trafficked and exploited people.	<ul style="list-style-type: none"> Northern Ireland less attractive as a destination for traffickers/enslavers. 	<p>Contribute to Home Office's Trafficking in Supply chains (TISC) consultation.</p> <p>Continue to talk about demand for chocolate/coffee/sugar/cotton etc with general public in partnership with STOP THE TRAFFIK and other global organisations.</p>	<p>May 2015</p> <p>Ongoing</p>	<p>DOJ</p> <p>No More Traffik</p>
6	Capture best practice over time.	<ul style="list-style-type: none"> Improved response; Greater reporting of suspicions. 	Review effectiveness of campaigns/projects to inform future work.	Ongoing	Awareness Subgroup

STRATEGIC PRIORITY 4: PARTNERSHIP-

Effective partnership working, identification of best practice and lessons learned

No.	OBJECTIVE	PROJECTED OUTCOMES	ACTIONS	TARGET DATE	OWNER
1	Cooperation between relevant statutory agencies.	<ul style="list-style-type: none"> • Sharing of intelligence; • Better use of limited resources. 	Facilitate regular meetings of the OCTF Immigration and Human Trafficking Subgroup.	Meetings on a quarterly basis.	DOJ
2	Cooperation and coordination between Government and civil society.	<ul style="list-style-type: none"> • Reduction in duplication; • better use of limited resources. 	Facilitate regular meetings of the Human Trafficking Engagement Group and its Awareness Subgroup.	Meetings on a quarterly basis	DOJ
3	Appropriate information sharing.	<ul style="list-style-type: none"> • Increased identification of victims; • Reduction in duplication; • Better use of limited resources. 	Maintain links to allow NGOs to share suspicions of trafficking with PSNI or other First Responders.	Ongoing	PSNI
			Statutory partners are kept informed of what civil society partners are doing and vice versa.	Ongoing	DOJ
			Maintain Forward Look to capture and coordinate the work planned by Government and civil society over the next 12 months.	Ongoing	DOJ and Engagement Group

			Conduct 3 year review on the effectiveness of the Engagement Group.	December 2015	DOJ and Engagement Group
4	Effective cross-border cooperation.	<ul style="list-style-type: none"> Consistent approach adopted. 	Capture lessons learned from the Reach Project.	Closing conference to take place in November 2015	DOJ, Women's Aid and PSNI.
			Conduct a biennial analysis of victim referrals, on a cross-border basis, to identify key learning points and common themes.	March 2016	DOJ and DOJE
			Co-host cross-border human trafficking and slavery/forced labour forum.	January 2016	DOJ and DOJE
			Regular meetings between DOJ Human Trafficking Team and DOJE Anti- Human Trafficking Unit.	Ongoing	DOJ and DOJE
5	Strategic alignment with other UK jurisdictions.	<ul style="list-style-type: none"> Consistent approach adopted. 	Ensure that NI legislation surrounding human trafficking and slavery is consistent with legislation across the UK, where appropriate.	End of 2015	DOJ
			Continued attendance at Inter-Departmental Ministerial Group and supporting groups.	Ongoing	DOJ

6	Engagement with the UK Independent Anti-Slavery Commissioner.	<ul style="list-style-type: none"> Improved coordination; Informed strategic and operational response. 	Regulations to specify public authorities with a duty to cooperate with the Anti-Slavery Commissioner.	Autumn 2015 (dependent on Home Office).	DOJ
			Inform the Anti-Slavery Commissioner's strategic plan.	March 2016	DOJ
			Consider and implement recommendations made by the Anti-Slavery Commissioner.	Ongoing	DOJ, OCTF IHT Subgroup and Engagement Group.
7	Building strong pan-European links.	<ul style="list-style-type: none"> Sharing of best practice. 	Seek opportunities for collaboration on pan-European projects.	Ongoing	DOJ/OCTF partners
			Monitor developments in the EU.	Ongoing	DOJ
			Explore the development of an Assisted Voluntary Return (AVR) framework to safely return victims of trafficking to their country of origin.	January 2016	Migrant Help/ DOJ/PSNI

**RESPONSE QUESTIONNAIRE - DRAFT NORTHERN IRELAND
HUMAN TRAFFICKING AND EXPLOITATION STRATEGY 2015/16**

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

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:

Question 2

The proposed overall strategic aim of the draft strategy is: “To equip Northern Ireland to drive out human trafficking, slavery and forced labour.”

In your view, is this strategic aim appropriate? What, if any, alternative strategic aim would you propose?

YES / NO

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

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 (provision of effective protection and support and improved identification of victims);
- Prevent (prevent and reduce risk of human trafficking and exploitation in Northern Ireland); and
- Partnership (effective partnership response to human trafficking and exploitation).

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:

Strategic priority 1: Pursue

Question 4(a)

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

- Bring forward secondary legislation to implement the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015;

- Implement provisions in the Modern Slavery Act 2015 which extend to Northern Ireland;
- Improve the gathering and sharing of intelligence and ensure effective analysis;
- Effective investigations and prosecutions;
- Effective training for law enforcement;
- Enhance public protection;
- Pursue criminal finances of traffickers and enslavers;
- Enhance understanding of online recruitment; and
- Effective cross-border and international police collaboration.

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)

The proposed actions associated with this strategic priority are set out at pages 27 to 31 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:

Strategic priority 2: Protect and Support

Question 5(a)

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

- Improve victim identification and support;
- Protect and deliver support services to potential victims going through the NRM process;
- Protect and support victims through the criminal justice system;
- Raise awareness of the rights and entitlements of victims;
- Provide protection and support services to children;
- Appropriate access to legal representation;
- Appropriate access to compensation services; and
- Reinforce capacity to respond to major human trafficking or slavery-like incidents.

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 32 to 36 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:

Strategic priority 3: Prevent

Question 6(a)

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

- Continued engagement with at-risk groups;
- Raising public awareness of the signs and indicators of human trafficking, slavery and forced labour;
- Targeted engagement and awareness raising with key sectors;
- Engagement with the private sector to increase knowledge and understanding of human trafficking, slavery and forced labour;
- Understand and reduce demand for the services of trafficked and exploited people; and
- Capture learning over time.

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 37 to 40 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:

Strategic priority 4: Partnership

Question 7(a)

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

- Cooperation between relevant statutory agencies;
- Cooperation and coordination between Government and civil society;
- Appropriate information sharing;
- Effective cross-border cooperation;

- Strategic alignment with other UK jurisdictions;
- Engagement with the UK Independent Anti-Slavery Commissioner; and
- Building strong pan-European links.

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 41 to 43 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:

/Continuation of response to 7(b)

An electronic version of this document is available in the consultation section of the Department of Justice website (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@dojni.x.gsi.gov.uk or posted to the following address:

Human Trafficking Team
Protection and Organised Crime Division
Department of Justice
Room B4.20
Castle Buildings
Stormont Estate
Belfast
BT4 3SG
Telephone: 028 9052 0759
Textphone: 028 9052 7668

The closing date for this consultation is 21 August 2015