

**Barnardo's NI**

**Consultation Response to the Department of Justice  
Draft Northern Ireland Modern Slavery Strategy 2018-19**

**October 2018**

Barnardo's NI is the largest children's charity in Northern Ireland. We work with approximately 14,000 children, young people and families across more than 50 different services and programmes and in over 200 schools. We provide a wide range of services, from providing family support to working directly with children and young people in need of support. We believe that every child deserves the best possible start in life, and our service provision reflects that philosophy.

Barnardo's NI welcomes the opportunity to comment on the draft Northern Ireland Modern Slavery Strategy 2018-19. Our comments are informed by our experiences of supporting unaccompanied children, refugee and newcomer families, and children who are Looked After. Through our delivery of the regional Independent Guardian Service since April 2018, we have provided Guardians for some 36 separated children, including some who were victims of human trafficking.

We also have a range of other relevant service delivery experiences. Since December 2015, we have delivered a service in collaboration with other local voluntary organisations to provide intensive support to refugees placed in Northern Ireland as part of the Syrian Vulnerable Persons Relocation Scheme, supporting families and children to cope with both trauma and integration in Northern Ireland. We also have a varied portfolio of mental and emotional health and wellbeing services, reflecting an ACEs (Adverse Childhood Experiences) -aware and trauma-informed practice ethos. In addition, our regional service, Safe Choices, is a specialist child sexual exploitation service, which supports children, young people and families affected by complex sexual abuse, and can provide specialist therapeutic support for children trafficked internally for sexual exploitation.

This response provides general comments on the strategy overall before looking at two key themes (internal trafficking and data collection) and two of the priority areas identified in the draft strategy (Protect and Prevent).

## **1. General comments**

- 1.1. We welcome the three Strategic Priorities identified in the strategy, and the move to incorporate 'Partnership' throughout the remaining three areas. However, there is a concern that, with less explicit emphasis on 'Partnership', ownership of actions is not identified in the strategy, and that training needs of key partner organisations will not be identified and met. Barnardo's NI recommends that partner organisations are identified throughout the strategy for each 'mechanism for delivery'. In addition, the interface between the three priority areas should be considered as part of the strategy; we recommend that this strategy should outline how information and learning is passed between partners throughout the process.
- 1.2. Whilst we welcome the recognition in the strategy that children who are victims have specific needs, we are concerned that those measures are only identified in separate sections, instead of being integrated throughout the strategy. Children are among the most vulnerable to modern slavery and human trafficking and are affected by all the issues highlighted in the strategy, therefore we recommend that the needs of children are highlighted throughout the strategy, in each objective.
- 1.3. There is a concern that the strategy lacks reference to the Home Office as a partner organisation. The Home Office engages with vulnerable children and adults, often at their most difficult time, and some of the procedures currently in place often do not reflect the emotional complexities or trauma of the situation. In particular, interviews with children who are victims of modern slavery and trafficking are often not approached with the same sensitivity as interviews with vulnerable children recounting traumatic events elsewhere in our government systems. We recommend that professionals who interview these vulnerable children and young people receive training in trauma-awareness and practice.
- 1.4. We welcome recent changes to the National Referral Mechanism (NRM), providing increased support for those whose application is accepted and also those that are not. We reaffirm our position that NRM status should not necessitate participation in prosecution of the perpetrator in cases of human trafficking and modern slavery.

## **2. Internal trafficking**

- 2.1. Child trafficking is child abuse. As such, it must be considered as a serious child protection issue and addressed in all its forms. It is

therefore critical that this strategy recognises and addresses that there are two distinct forms of child trafficking. Whilst the strategy (rightly) seeks to address human trafficking from other countries, we recommend that more consideration is given to those children who are trafficked internally. Internal trafficking was noted as an issue of concern in the Barnardo's NI research *Not a World Away* (Beckett, H, 2011), and we have since had experience of identifying local children who have been trafficked within Northern Ireland. As with our response to previous strategies, we continue to be concerned that the strategy makes no explicit reference to internal trafficking, and consequently the actions do not appear to be focused on this element of trafficking. We therefore recommend that internal trafficking is acknowledged and addressed as a specific strand of trafficking within the strategy.

- 2.2. With reference to internal trafficking and the sexual exploitation of children and young people, we recommend that there is a specific action point requiring partnership between the departments of Justice, Education and Health to work together to strategically reduce risk, as well as to help others (including teachers and social care workers) to identify risk. Supporting pupils to develop an understanding of healthy relationships, self-esteem and consent is important in addressing the circumstances that facilitate child sexual exploitation and can be delivered through quality sex and relationship education; this, coupled with the awareness sessions mentioned in the strategy, would help provide the information that can help keep children safe. Similarly, a non-stigmatising safe place to talk and share worries or concerns, such as school-based counselling, can provide an important opportunity for a child to disclose experiences or indicate a risk of internal trafficking and/or sexual exploitation.

### **3. Data recording and reporting**

- 3.1. We welcome the commitment to data collection throughout the strategy. It is important to monitor, record, and publish (in an anonymised format) the number of people affected by modern slavery and human trafficking. Barnardo's NI recommends that all data should be disaggregated by age, gender, care status, housing status, country of origin and nationality. This will enable the appropriate support services and interventions to be developed based on the learnings, and ensure that training for frontline practitioners engaging with victims is up-to-date and responsive to developing need.
- 3.2. Barnardo's NI believes it is crucially important that data collection is consistent across partner organisations and that this data should be

collated centrally. Data from the Home Office should also be collated centrally and made available; the strategy should outline what responsibility the Home Office has to record or refer potential victims to the NRM or other organisations.

- 3.3. We welcome data collection on the 'number of non-NRM potential victims', however, the strategy must be clearer on what this entails. We believe it is important that the strategy is clear that many potential victims are not officially referred to the NRM for various reasons, including refusal to sign consent forms. There should be clarity whether this data referenced above includes only those who have not signed the consent form, and whether schemes can refuse to provide this information. We know that the numbers currently reported on victims of modern slavery and human trafficking do not reflect the full scale of the problem and therefore it is difficult to identify where the gaps in provision of support, or identification of victims, are.

#### **4. Strategic Priority: Protect**

- 4.1. We welcome the identification of re-victimised victims as a separate group; however there is a concern that the strategy does not indicate how data collected will be used, and whether a separate plan will be developed in order to support re-victimised victims. Of particular concern are those victims who are initially identified through children's services; some of these victims are moved out of the country when identified, and trafficked back to Northern Ireland as an adult, therefore, as these victims are no longer under the remit of children's services, and there is no record of them under adult provision, they are not identified as at-risk and in need of support.
- 4.2. We welcome the commitment to training of 'First Responders'; it would be helpful if the list of these organisations was appended to the strategy. Furthermore, the community and voluntary sector should be clearly identified as partners in this Strategic Priority as this sector delivers many of the services supporting victims and tackling modern slavery and human trafficking, and therefore has significant delivery experience and insight. All organisations providing contracted services under this strategy should be independently reviewed and evaluated at appropriate intervals to ensure learning is captured, and services are effective and providing maximum benefit to victims.
- 4.3. We welcome the intention to facilitate building trust between the PSNI and non-NRM potential victims, however there should be clarity on what this entails and how it will be achieved. We also welcome the commitment to supporting reintegration of victims. It would be helpful

if the strategy examined how links will be established to support reintegration as this is a complex process which takes place over time with support from services, the voluntary sector, and the community.

- 4.4. We welcome the commitment to providing training for Prosecutors and Prosecuting Counsel, however we believe this should be extended to the whole legal sector. Furthermore, this training should include specific guidance on working with children, particularly children who have experienced trauma, and examine the balance between getting the best evidence vs. re-traumatising the victim. In addition, HSC Trust staff and PSNI need appropriate training, rather than guidance, on actions to take when they encounter a potential child victim. CSE protocol training is already in place when supporting children in other areas of work; this could be used as a basis for guidelines when working with children who are victims of modern slavery and human trafficking.

#### *Independent Guardian Service*

- 4.5. We welcome the commitment to providing appropriate accommodation for children. Feedback from our service delivery indicates that children who are victims of human trafficking and/or modern slavery need therapeutic homes which can meet their emotional health and wellbeing needs. Every case should be examined on an individual basis and the needs of the child assessed. Currently, there are vulnerable children and young people in unsupported community accommodation; often these children do not speak English and there is a high suicide risk. Barnardo's NI would like to raise concerns that community placements are not appropriate accommodation for children who are victims of modern slavery and trafficking.
- 4.6. We would draw your attention to the regional facility for separated/unaccompanied/trafficked children and young people, which is a model of good practice of an initial placement for a child who is potentially a victim of human trafficking or modern slavery. This facility has been successful in providing support and care for children after such a traumatic event.

## **5. Strategic Priority: Prevent**

- 5.1. As outlined in 4.6 of the consultation document, although increased awareness of modern slavery will hopefully lead to reduced demand of services in time, there will be an initial spike in demand as people identify more cases. As the lifespan of this strategy is 12 months, we

would recommend that the outcome measurement reflect an initial spike in demand as a result of an effective awareness raising campaign.

- 5.2. Public awareness raising has been successful in Northern Ireland in the past, however the challenge is maintaining and developing upon that awareness. Voluntary and community organisations are a vital partner in awareness raising. We recommend that the voluntary and community sector should be consulted on the development of the OCTF Communication Plan. Furthermore, awareness raising needs to provide specific information on identifying children and young people who may be victims. Awareness campaigns should target key locations and provide information on indicators of trafficking. We suggest that key locations should include: airports, bus terminals, train stations, toilets/public bathrooms, hospitals, hotels/hostels, and other night-time economy settings.
- 5.3. We welcome the emphasis on at-risk communities, however it is not clear how at-risk communities have been identified for the purposes of the strategy. It is essential to gather a demographic breakdown of information gathered on victims to understand how at-risk communities can be identified and what the most effective interventions would be. For example, Barnardo's NI is concerned about the vulnerability of children who are Looked After, particularly those in residential care – our research *Not a World Away* (Beckett, H, 2011), identified these children as particularly at-risk of child sexual exploitation. Furthermore, the Marshall Inquiry report (2014) also identified children who are Looked After and in residential care as a 'particularly vulnerable group' to child sexual exploitation.

## **Conclusion**

Barnardo's NI welcomes the opportunity to respond to this draft strategy. We consider it vitally important that children are considered throughout the strategy, while it is being developed and during its implementation. We would be happy to engage further with the Department to represent the views of the children, young people and families we work with to share our experience and findings.

For further information, please contact:

### **Trása Canavan**

Policy & Research Officer

Barnardo's NI

trasa.canavan@barnardos.org.uk