

Barnardo's Northern Ireland

**Domestic and Sexual Abuse Strategy
(Department of Health, Department of Justice)**

**Equally Safe Strategy, Violence Against Women and Girls
(The Executive Office)**

Barnardo's NI is the largest children's charity in Northern Ireland. Every year we work with more than 18,000 children, young people and families across more than 45 different services and programmes. We are a leading provider of schools-based support, reaching more than 32,000 children in schools across the UK and Ireland through our NI-managed social and emotional literacy programmes.

We deliver a wide range of services, from providing family support and early intervention, to working directly with children and families who have experienced adversity and need our support. Our goal is to achieve better outcomes for more children. To achieve this, we work with partners to build stronger families, safer childhoods and positive futures.

Barnardo's NI welcomes the opportunity to provide our response to the Call for Views on the Domestic and Sexual Abuse Strategy and the Equally Safe Strategy. Our comments are informed by our work with the diverse communities of children and families that we support through our 45+ services in Northern Ireland. It is important that both strategies speak to, and meet the needs of, the wide range of experiences in Northern Ireland. For example, the Barnardo's NI Refugee Support Service provides intensive support to refugees placed in Northern Ireland, supporting families and children to cope with both past trauma and integration into Northern Ireland. We have used this breadth of service experience to inform our comments and recommendations

Barnardo's NI also provide specialist support to children, young people and families affected by, or at risk of, sexual abuse or exploitation. Our regional service, SEEN (Sexual Exploitation Ends Now), is a specialist child sexual exploitation service, which supports children, young people and families affected by, or at risk of, sexual abuse, and can provide specialist therapeutic support for children who have experienced sexual exploitation.

Our response will provide on a number of cross-cutting themes that apply to both strategies and their development. We will then look at specific feedback related to the Domestic and Sexual Abuse Strategy and the Equally Safe Strategy in turn.

CROSS-CUTTING THEMES

1. General comments

- 1.1. Barnardo's NI welcomes this Call for Views on two important strategies. We would urge the departments to ensure that, in finalising and implementing these strategies, they are fully resourced and funded. A range of great strategies have been written and published in Northern Ireland throughout the years, however these strategies must be effectively implemented and funded in order to make a real difference to people's lives. The strategies in this consultation aim to achieve the societal changes and this will require commitment, determination, resourcing, and funding.
- 1.2. Many of our services and systems in Northern Ireland are stretched beyond their capacity. This has been the case for several years, and the impact of the pandemic has only heightened the challenges we face. Resourcing and funding of services has not increased to match the increased pressures and demands on services and the workforce. It is essential that the implementation of these strategies does not become another item on a long list for already stretched services. By comprehensively resourcing and funding this strategy, services will be able to effectively and meaningfully bring the strategies to life and work towards achieving the outcomes.
- 1.3. Barnardo's NI emphasises the need for both strategies to recognise the particular needs of children and young people throughout the different objectives and workstreams, understanding how these needs differ from those of adults. It is important that where support and services are made available for children and young people, they are age appropriate and tailored to their needs. Additionally, any awareness raising campaigns for children and young people must consider how the younger generation engage with public messaging and the best ways to reach them.
- 1.4. The tailoring of support is also very important when we consider the diversity of Northern Ireland's population. These strategies cannot take a one-size fits all approach and must take into consideration the different experiences and needs of our communities. These strategies must be intersectional to be effective, including for example, our LGBT+ community, minority ethnic communities and disabled community.
- 1.5. We believe that there is a lot of potential for these strategies to make a positive impact on the everyday life of women and girls, and victims of domestic and sexual abuse. It is important that as the strategies are

implemented and rolled out, there is consistency throughout Northern Ireland in terms of support available and access to services.

- 1.6. While much of the focus of these strategies is on challenging stereotypes and public attitudes, it is crucial that the strategies address stereotypes and attitudes within Northern Ireland services and delivery teams, especially statutory services. Barnardo's NI has supported young people who have asked to withdraw a complaint or case against someone as a result of their experience interacting with justice officials or statutory services. This could also impact on a person's decision to report acts of harassment, abuse or violence in the future if they feel they won't be believed or listened to. In order to achieve the attitude and culture within our services, clear guidance and training should be provided to all frontline services, in addition to the trauma informed practice which we will explore further below.
- 1.7. A key theme running throughout both these strategies is the impact of trauma, both in the everyday harassment and prejudice that women and girls face, as well as the significant and complex trauma of a person who has been assaulted or abused. It is imperative that both these strategies take a trauma-informed approach both in the strategy development, and in the implementation and delivery through services and support. This means that the strategy and services will take into account the impact of trauma on individuals, and consider that each person may have particular needs that must be addressed alongside the support they are receiving.
- 1.8. Barnardo's NI welcomes the cross-departmental approach adopted in rolling out this consultation and the commitment to this in the work ahead. We recommend that the strategies clearly set out the roles and responsibilities of each department so that there are clear lines of accountability. Actions should be assigned to specific leads in each department who are responsible for co-ordinating the implementation, resourcing and funding of the strategies.
- 1.9. The Children's Services Co-operation Act (2015) is a key piece of legislation which should be utilised in the implementation of the strategy. This Act places a duty on government departments to work together to deliver the best outcomes for children. These strategies are a clear case of where this Act could be used to best effect, both to encourage and facilitate cross-departmental working to achieve shared objectives, and also to pool resources to ensure the funding matches the stated commitment.

- 1.10. In addition to accountability within the government implementation and delivery of the strategies, Barnardo's NI also recommends that professional accountability is built-into the implementation of the strategy for those services commissioned or working under these strategies to ensure outcomes are monitored and achieved.
- 1.11. Barnardo's NI also recommends that the strategies build in a continuous review process, in order to ensure the strategies are effective and responsive. It is important that examples of good practice are shared and replicated throughout Northern Ireland in a timely and accessible manner, and that we learn the lessons from actions that have been less successful. The strategies should also identify a mid-way point at which a more in-depth review, assessment and report should be produced against the outcomes.

2. Relationships and Sexuality Education

- 2.1. Barnardo's NI strongly believes that providing standardised, age-appropriate, mandatory Relationships and Sexuality Education (RSE) in all schools as part of the core curriculum would play a key role in educating young people about healthy relationships, consent and boundaries. Barnardo's NI believes that whole-school approaches to well-informed RSE in schools would be invaluable in challenging myths and stereotypes from a young age, as well as encompassing topics such as mental health, wellbeing, and resilience.
- 2.2. While RSE has been a statutory component of the primary and post-primary school curriculum in Northern Ireland since 2001, programme content and delivery are determined by individual schools. The approach to RSE is based on the school's interpretation of guidelines issued by CCEA and is framed in the ethos of the school. This has resulted in large inconsistencies between schools in Northern Ireland in the quality of RSE provided and the content of the RSE programmes.
- 2.3. The importance of standardised, well-informed RSE has been recognised throughout the UK and Ireland. In England, compulsory RSE was rolled out for post-primary schools from September 2020¹ and in Wales, Sex and Relationships Education (SRE) is a compulsory element of the basic post-primary curriculum. In Ireland, a complete review of RSE provision

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908013/Relationships_Education_Relationships_and_Sex_Education_RSE_and_Health_Education.pdf

is currently underway to ensure the curriculum is fit for purpose and meets the need of young people today.

- 2.4. Barnardo's NI recommends that RSE should explore digital citizenship, including an understanding of online safety, privacy and ethics. For children growing up in Northern Ireland today, there is little separation between their online and offline worlds, and this has been compounded by the pandemic and shift to online learning. It is essential that children are provided with the knowledge and skills to understand how their interactions online can impact their life, and that of those around them.
- 2.5. The Barnardo's NI LifeSkills programme is a universal, highly effective, early intervention and prevention programme, designed for whole class, in-school delivery for 8-14 year olds. LifeSkills concentrates on a preventative approach which shares age-appropriate information with children and young people, providing them with the skills, knowledge and attitudes to make healthy choices. Studies have shown that LifeSkills can reduce the prevalence of risk-taking behaviours by up to 75%, with effects lasting 12 years². The LifeSkills programme builds capacity by equipping teachers with the skills to prevent risky behaviours.
- 2.6. Finally, good quality RSE has an important role to play in addressing and preventing harmful sexual behaviour in children. Children who display harmful sexual behaviour should be treated as children first and foremost. Rather than regarding this as a justice matter, this is a safeguarding issue and children who display harmful sexual behaviour should be referred to appropriate early intervention services to prevent the escalation of these behaviours and address the underlying factors. We believe that prevention, via effective early intervention, based on understanding the motivators and causes is an effective approach.

3. Barnahus model

- 3.1. The Barnahus model has been demonstrated as an effective model of supporting child victims of sexual abuse or exploitation, and the [Gillen Report](#) (2019) recommended that the Department of Justice give consideration to the Barnahus scheme in Iceland. Barnahus is a child-friendly, interdisciplinary, and multiagency centre, whereby different

² For more information on LifeSkills, see '[LifeSkills - Findings from the implementation of Botvin LifeSkills within North Down and Ards](#)' (2019)

professionals work under one roof in investigating suspected child sexual abuse cases and providing appropriate support for child victims.

- 3.2. The 2020 Criminal Justice Inspection Northern Ireland (CJINI) [report](#) on child sexual exploitation (CSE), supported the recommendation from stakeholders that the preferred approach to CSE cases was to implement the Barnahus model, rather “an approach that simply tweaked the existing system”.
- 3.3. Barnardo’s NI recommends that the Barnahus model is considered in the development of both strategies as leading trauma informed practice in ensuring children who are victims of sexual abuse are not re-traumatised by participation in justice and supported on a path to recovery.

4. Online safety

- 4.1. During the first lockdown, Barnardo’s surveyed children and young people we support UK-wide about the impact of the pandemic on them in relation to the content they are being exposed to online and we found:
 - Around a quarter (27%) of young men aged 16-24 said they had seen more content online that made them uncomfortable or scared than before lockdown; this rose to more than two fifths (42%) for young women.
 - For children aged 8-15, one in five (21%) boys and girls said they had seen more potentially harmful material than usual.
 - Overall, over a quarter (27%) of children and young people aged 8-24 said they had seen more things online that made them uncomfortable or scared than before lockdown.
 - More than four in five (83%) children and young people reported spending an increased amount of time online during lockdown, which could have resulted in the increased exposure to harmful material.
- 4.2. Children have a right to be safe online and they trust adults to do this for them. Yet far too often we put the onus on children to keep themselves safe. As a society we understand that children are not responsible for physical or sexual abuse that is inflicted on them, however the same cannot be said for online harms. While it is important to educate children on healthy relationships and online safety, the responsibility for this abuse lies with the perpetrator. While

responsibility for regulating tech companies lies with Westminster, there is work to be done in Northern Ireland in changing attitudes and supporting children who experience online abuse.

- 4.3. Children who experience abuse online are not offered the same support pathway as children who have been abused offline. There must be parity in the support offered to children to help them recover from the trauma. Additionally, there must be better and consistent support for all types of child abuse especially as they often overlap.
- 4.4. In terms of strategic action at the Northern Ireland level, the Department of Health's Online Safety Strategy and Action Plan has been consistently delayed since the initial consultation in 2015. The consultation was undertaken in recognition of the scale and nature of the challenge of online safety and the associated risks. Given the impact of the pandemic and the increased risks children and young face, it is crucial that the strategy and action plan are implemented as a priority.
- 4.5. Additionally, the online world has changed immensely since the original consultation on this strategy and action plan, and in order to protect our children and young people, we must have the most up to date and effective action plan in place. Developments in online communication continue to evolve rapidly and the Online Safety Strategy must reflect and address this.

5. Data collection

- 5.1. Establishing a clear and comprehensive picture about societal attitudes and the nature and extent of domestic and sexual abuse in Northern Ireland should be amongst the first priority areas of work if these strategies are to effect real change and ensure services are targeted where they are needed.
- 5.2. The Strategy must be informed by accurate and more up to date, relevant statistical information, including how many children and young people are currently impacted. We welcome the commitment in the strategies to data collection and we acknowledge the challenge in establishing a comprehensive picture of the issue given the well recorded challenges of underreporting in this area.
- 5.3. It is essential that the data collection reflects not just the general population statistics, but also disaggregates for different groups to ensure the right support is reaching people at the right time. In addition,

we would encourage the departments to consider how they may ensure the statistics account for, and reflect, the nature of underreporting of these issues.

- 5.4. Children are often left out of statistics which report on the impact of domestic abuse in families, thereby masking the issues that many children and young people are facing. For example while statistics in NI are available in relation to high risk domestic violence cases discussed by MARACs (Multi Agency Risk Assessment Conferences), Barnardo's NI recommends information should be collated and published on all children in families receiving social services where domestic violence is present, especially in respect of those on the child protection register; and also the number of children in every household attended by the police in relation to an incident of domestic violence.

DOMESTIC AND SEXUAL ABUSE STRATEGY

6. Vision and workstreams

- 6.1. Barnardo's NI welcomes the vision set out for the strategy.
- 6.2. While we welcome the intention of *Workstream 1*, it is unclear what this would look like in reality. The workstream does not commit to co-producing the 'whole system approach' so it is unclear how this joint commitment, leadership and partnership working would function in practice. Barnardo's NI would welcome a clear outline of this in the draft strategy. As detailed in the general comments, departmental leads must be identified in order to drive the work forward and to ensure accountability against outcomes.
- 6.3. We welcome the emphasis placed on prevention and early intervention in *Workstream 2*. It is important that when we design prevention and early intervention programmes that we take steps to understand the nuances of the diverse communities in Northern Ireland, recognise the range of experience and cultural understanding, and reflect this in strategy and implementation.
- 6.4. Workstream 2 also touches on developing an understanding of safe and healthy relationships from an early age. As highlighted in the cross-cutting themes above, Barnardo's NI believes that Relationships and Sexuality Education (RSE) has a key role to play in this, and ensure all our children have access to standardised, well-informed, mandatory RSE is core to achieving this.

- 6.5. It is vital that the implementation of *Workstream 3* meets the needs of all groups and communities in Northern Ireland. For example, we know that it can be more difficult for refugee or asylum-seeking women to access services or support if they are the victim of domestic abuse due to language barriers and cultural differences. Through our delivery of the Northern Ireland Refugee Support Service, we know that where these communities have advocates who can make contact with services and bridge that connection, they are better able to avail of support.
- 6.6. This experience speaks to the complexity some people can experience in accessing support and services in Northern Ireland, and the additional barriers that some communities face. Individuals should not need detailed knowledge of the system in order for the system to work for them. All services and support must be accessible for all our communities; engaging directly with these communities on how to make our systems more accessible would be the best way to understand and reflect this in practice.
- 6.7. We also know that the needs of young people are often not met in service or support for victims of domestic abuse. Young people who have to leave their home as a result of domestic abuse are often housed in unsuitable accommodation at key stages of their life, for example final years of education or starting out in their work life. Services and support provided to children and young people must be safe, age-appropriate and tailored to their needs.
- 6.8. Finally, it is essential that *Workstream 3* explicitly references the expertise that services must have. It is not good enough for services to aim only to be responsive and have capacity; they must also be experts at what they do. Barnardo's NI recommends that this workstream reflects this and makes a commitment to a culture of continuous learning and improvement.
- 6.9. While we welcome the commitment in *Workstream 4* to supporting different needs through a dedicated workstream, these needs must also be recognised and met under every single workstream so that all services and support meets the needs of all our communities. This strategy and the services that flow from it must be fully intersectional. Barnardo's NI recommends that the departments engage directly and meaningfully with people from those communities in order to hear their lived experience and to meaningfully understand their needs.
- 6.10. In its current format, *Workstream 5* makes no reference to children. The experience of children in the justice system is often overlooked or forgotten entirely. Barnardo's NI recommends that training for justice

professionals should include specific guidance on working with children, particularly children who have experienced trauma. For those professional working with children who are victims or witnesses, this training should examine the balance between getting the best evidence vs. re-traumatising the child.

- 6.11. Barnardo's NI delivers the Independent Guardian Service, and we know that access to justice for this particularly vulnerable group of children is often challenging and frustrating. Many children who are supported by the Independent Guardian Service have been the victim of trafficking and have experience severe and complex trauma before arriving in Northern Ireland. A key element of the Guardian's role is to ensure that the child's voice, wishes, and feelings are heard and represented with all professionals involved in their case and to advocate for the best interests of the child. The justice system must support, protect and listen to these children and their Guardians to ensure that their needs are met.
- 6.12. Additionally, children in families or households where there is domestic abuse are often forgotten about when designing services and support. We know that the impact on children of growing up in a household where there is domestic abuse can be lifelong. This impact was recognised in the Domestic Abuse and Family Proceedings Act 2021 through the child aggravator clause and this should be reflected in this workstream through the design and delivery of services.

7. Child Sexual Abuse Strategy

- 7.1. While children and young people are included in the workstreams of the Domestic and Sexual Abuse Strategy, particular attention must be given to child sexual abuse (CSA). Barnardo's NI recommends that the departments develop a distinct CSA Strategy that would sit within the overall Domestic and Sexual Abuse Strategy.
- 7.2. The 2011 Barnardo's NI report, '[Not a world away](#)' examined the sexual abuse and exploitation of children and young people in Northern Ireland. This report sought to increase knowledge and understanding of the sexual exploitation of children and young people in NI, in order to aid better prevention of, and responses to, the issue in the future. The report makes for difficult reading, however this is the reality that children were and still are facing.

- 7.3. Additionally, Northern Ireland is falling behind other nations in the UK, given the publication of a cross-departmental strategy on CSA by the Home Office in January 2021. The development of this Domestic and Sexual Abuse Strategy provides the opportunity for Northern Ireland to give children and young people the same protection as their peers in England and Wales. It is essential that a distinct strategy is developed as a priority to tackle child sexual abuse and exploitation in Northern Ireland.
- 7.4. We echo the calls made by NSPCC NI in their response to this Call for Views detailing the key elements that should be contained within a CSA Strategy for Northern Ireland. We believe this is essential in order to successfully address child sexual abuse and exploitation.

EQUALLY SAFE STRATEGY

8. Vision and objectives

- 8.1. Barnardo's NI recommends that the *vision* for this strategy is broadened to reflect the role that everyone in society, women, men, girls and boys, have to play in ensuring women and girls are safe. The first sentence in the vision could be read as women and girls having sole responsibility for making themselves safe, feel safe and reach their full potential. There can be no room for interpretation and the vision should be explicit that all of this work is the responsibility of everyone in society. We believe the name of the strategy 'Equally Safe' reflects this.
- 8.2. Barnardo's NI agrees with *Objective 1*, that comprehensive data collection should be established and implemented in order to fully understand the scope, scale and nature of the issue. This data collection must incorporate all groups and allow for disaggregation of data to understand trends and challenges within different communities.
- 8.3. This objective must also consider how it will account for underreporting of violence and prejudice against women and girls. No data collection method, even using anonymous approaches, will truly reflect the reality of the situation. Therefore, we would encourage the department to consider how underreporting will be factored into data analysis.
- 8.4. Prevention and early intervention, as highlighted in *Objective 2*, is crucial in tackling this issue long term and for future generations. The objective references 'the public sphere' and this must include all public

services and systems. The approach to prevention and early intervention must be deeply embedded in society; it must be universal.

- 8.5. While Barnardo's NI welcomes the commitment to a co-design approach for the strategy, this must reflect the true nature and meaning of co-design. Too often we have seen co-design commitments, when in reality the process is consultation or engagement. Barnardo's NI encourages the department to work with partners to understand what co-design would look like for this piece of work. A true co-design approach values all partners as equal decision makers who are involved in every stage of the development and design process.
- 8.6. If a co-design approach is adopted, it must be well funded and resourced in order to facilitate full participation and representation of different communities, this includes children and young people, minority ethnic communities, LGBTQ+ community, and disabled people. Barnardo's NI would be happy to engage with the department as it develops its co-design approach and share our experience and learning of this process.
- 8.7. The emphasis in *Objective 4* must go beyond responsive services. Services must have expertise which is continually developed and refreshed. This piece of work must also reflect people's experience of engaging with services, rather than focusing solely on functionality. From our experience, children and young people have a wide range of experiences interacting with services, from having very positive experiences to other who have had a negative experience and as a result have stopped engaging with professionals.
- 8.8. Additionally, services must also be accessible and available to all communities. This means ensuring that awareness-raising goes beyond mainstream or conventional approaches and engages with different communities and groups to understand how best to engage and raise awareness among different populations.

9. Harmful practices

- 9.1. When we consider violence against women and girls, we must be cognisant of the range of harmful practices that women and girls can be at risk of; this includes child or forced marriage, and female genital mutilation. The strategy must make provision as to how these practice can effectively be addressed.

- 9.2. Barnardo's believes that the minimum age of marriage should be raised to 18, in line with the age of compulsory education. This will help to prevent coerced and forced marriage amongst children. It will bring the current antiquated law on marriage into line with the broader legal framework on protecting children in Northern Ireland.
- 9.3. UNICEF clearly outline the risks of marriage before the age of 18: 'Marriage before the age of 18 is a fundamental violation of human rights. Many factors interact to place a child at risk of marriage, including poverty, the perception that marriage will provide 'protection', family honour, social norms, customary or religious laws that condone the practice, an inadequate legislative framework and the state of a country's civil registration system. While the practice is more common among girls than boys, it is a violation of rights regardless of sex'.³
- 9.4. In recognition of the risks facing children, especially girls from particular communities, in 2015 the Home Office funded Barnardo's and the Local Government Association to establish the National Female Genital Mutilation (FGM) Centre. In 2017, its remit was extended to address other harms linked to faith or belief. We know from the June 2021 Ofsted report into abuse and harassment in schools in England how much hidden harm affects young girls, however, forced marriage and related issues are even more taboo and less understood. Children who marry under 18 are more likely to be victims of domestic abuse and other harm, including harm linked to faith or belief.⁴
- 9.5. With an increase in the minimum age of marriage already in effect in the Republic of Ireland, and change underway in England and Wales, Northern Ireland risks being left behind the other nations with less protection for our children. Barnardo's has been supportive of the Private Members' Bill on the minimum age of marriage and forced marriage, currently progressing through Westminster.⁵
- 9.6. Another area which this strategy should consider is female genital mutilation (FGM). FGM is a hidden form of child abuse that has a devastating and potentially deadly impact on girls and young women. The best form of prevention is working with girls and their families; raising awareness in schools and communities; and training

³ <https://data.unicef.org/topic/child-protection/child-marriage/>

⁴ Child Marriage Report & Stories – Karma Nirvana

⁵ <https://www.theguardian.com/global-development/2021/may/04/child-marriage-thriving-in-uk-due-to-legal-loophole-warn-rights-groups>

professionals like teachers and social workers to spot at risk girls and make sure they understand and have the confidence to report it

- 9.7. While FGM is currently illegal in Northern Ireland, we know that the practice still occurs and according to a Freedom of Information request by the BBC⁶, at least 29 cases of FGM were recorded across 4 Health and Social Care Trusts from 2016-2018. It is important that data is routinely collected so that we can understand the scale of this issue.
- 9.8. According to a 2017 study by the African and Caribbean Support Organisation Northern Ireland (ASCONI)⁷, the key gaps in FGM support provision include:
- A lack of specialist services in Northern Ireland for physical or psychological support for survivors of FGM.
 - Health professionals are unclear what services exist and what is needed by girls and women affected by FGM.
 - Significant gaps in services to promote awareness raising of FGM for communities where FGM is prevalent. Best practice guidance from the Tackling Female Genital Mutilation Initiative⁸ recommends clear information on sharing information with newly arrived families and engaging with communities in an effective manner.
 - The lack of consistent data collection and reporting to ascertain the prevalence of FGM in Northern Ireland and develop specific support services
- 9.9. It is clear from the research that criminalising FGM is not the most effective means of preventing the risk of this harmful practice. We must both raise awareness with professional to increase understanding about identifying FGM and the support available, as well as working with communities to facilitate learning and understanding about the dangers and long-term impact of FGM on girls and women. Barnardo's NI recommends working with experts in the community to achieve this.

⁶ <https://www.bbc.co.uk/news/uk-northern-ireland-44935930>

⁷ <http://nationalfgmcentre.org.uk/wp-content/uploads/2018/01/FGM-REPORT-FINAL-EMAIL.pdf>

⁸ <https://www.trustforlondon.org.uk/documents/60/Communities-Tackling-FGM-in-the-UK-Best-Practice-Guid-1.pdf>

CONCLUSION

Barnardo's NI welcomes the consultation and engagement approach adopted by the departments throughout the consultation period on this Call for Views. We appreciate the thoughtful and in-depth conversations that have been facilitated with a wide range of stakeholders. This Call for Views is the start of the road ahead and we would encourage the departments to ensure that the development and implementation are underpinned by the key themes that we have highlighted.

Barnardo's NI would be keen to engage with the departments as these strategies are developed further.

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