

Barnardo's NI

**Department of Justice
Consultation on Measures to Strengthen the Response to
Modern Slavery and Human Trafficking**

May 2022

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 comment on this consultation to strengthen the response to modern slavery and human trafficking. Since April 2018, Barnardo's NI has delivered the Independent Guardian Service, which provides guardians for separated and unaccompanied children, including those who are victims, or potential victims, of human trafficking. 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.

In addition, our regional service, [SEEN \(Sexual Exploitation Ends Now\)](#), 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.

Our response will address the consultation proposals, as well as highlighting how the implementation of the proposals should be undertaken to ensure children who are victims of modern slavery or human trafficking receive the support they need.

Consultation proposals

- 1.1. Barnardo's NI supports the proposal to introduce Slavery and Trafficking Risk Orders, in line with the recommendation from the Independent Anti-Slavery Commissioner.
- 1.2. We also support the proposal to commence the Duty to Notify, and we reaffirm our position that NRM status should not necessitate participation in prosecution of the perpetrator in cases of human trafficking and modern slavery.

Referral to Independent Guardian Service

- 1.3. The implementation of the Duty to Notify must be undertaken alongside training for frontline staff and professionals, both to assist identification of victims of trafficking and modern slavery, and identification and immediate referral of children who are unaccompanied or separated to the Independent Guardian Service.
- 1.4. Under Article 21 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015, all children who are separated or unaccompanied in Northern Ireland are entitled to an Independent Guardian. The role of Independent Guardians is to ensure that the welfare and asylum rights of children are upheld, and to hold those responsible for meeting children's needs accountable for their responsibilities.
- 1.5. It is essential that, not only are professionals trained to identify unaccompanied or separated children who may have been trafficked, but also that they are aware of their responsibility to immediately make contact with the Gateway team in social services to ensure the child is referred to the Independent Guardian Service.

Internal trafficking

- 1.6. Often when we talk about trafficking, there is an assumption that this concerns people who have originated outside Northern Ireland, and while this is often the case, internal trafficking is also a serious concern.
- 1.7. Internal trafficking was noted as an issue of concern in the Barnardo's NI research report [Not a World Away: The sexual exploitation of children and young people in Northern Ireland](#) (Beckett, H, 2011), and we have experience of identifying local children who have been trafficked within Northern Ireland. As with our response to previous consultations, we continue to be concerned that no explicit reference is

made to internal trafficking, and consequently the actions do not appear to be focused on this element of trafficking. Barnardo's NI recommends that training is rolled-out on how to identify victims of trafficking, taking into account those aspects which may be different in cases of internal trafficking.

Data collection

- 1.8. 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.
- 1.9. 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. It is essential that Home Office data is disaggregated by location so that Northern Ireland specific data is available.

Barnardo's NI welcomes the opportunity to respond to this consultation. We consider it vitally important that children are considered throughout the development and implementation of these proposals. We would be happy to engage further with the Department to represent the views of the children we work with to share our experience and findings.

For further information, please contact:

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