Safeguarding Review: SBNI Practitioner Guidance on Child Criminal Exploitation (CCE)- Barnardo's NI Response

We appreciate the opportunity to feedback on the Practitioner Guidance on Child Criminal Exploitation, and we look forward to working together to embed this guidance and improve safeguarding outcomes for children and young people. We believe this tool will strengthen protective work and reinforce collaborative approaches across our organisations, helping us identify risks earlier and deliver coordinated support.

Key Strengths

The report demonstrates a comprehensive and well-integrated approach to addressing Child Exploitation within the Northern Ireland context. It provides detailed analysis of risk and protective factors across socio-economic, family, personal, and community domains, supported by updated Barnardo's research and published reports (2017 and 2023). Multi-agency roles and responsibilities are clearly defined, emphasising collaboration across health and social care, education, justice, and voluntary sectors.

A strong public health approach is evident, with service pathways articulated to support prevention and early intervention. The guidance prioritises trauma-informed, rights-based, and gender-conscious practices, ensuring responses avoid re-traumatisation and reflect intersectionality and cultural sensitivity. Language guidance is included to prevent victim-blaming, with recommendations for additional resources to reinforce this principle.

The guidance report demonstrates a positive and meaningful expansion in its consideration of the scope and scale of child victims affected by criminal exploitation. It acknowledges and includes victims from diverse backgrounds, ethnicities, identities, and age groups, equipping safeguarding practitioners across Northern Ireland to detect, respond to, and support all children impacted by this harm.

The report also integrates contextual safeguarding and professional curiosity, while recognising the influence of paramilitary activity and the unique Northern Ireland legislative and policy framework. Clear references to legal protections, threshold interventions, and timeframes enhance practitioner understanding for effective safety planning.

The report effectively identifies and explores the spectrum of exploitation, helping professionals understand the varying levels of risk and the potential evolution of harm that children and young people may be exposed to. This nuanced approach supports practitioners in recognising early indicators and adapting interventions accordingly. However, the guidance also highlights a critical concern that children and young people affected by exploitation are too often criminalised for behaviors that are a direct result of coercion and abuse, rather than being recognised and safeguarded as victims. Addressing this issue requires a consistent rights-based approach, that prioritises protection over punishment and ensures that safeguarding responses are informed by an understanding of trauma and exploitation dynamics.

Independent Guardian Service

Child Criminal Exploitation (CCE) presents a growing challenge for the Independent Guardian Service (IGS). While the service traditionally focuses on safeguarding victims of human trafficking, the evolving nature of exploitation means that many children experience overlapping harms, including criminal exploitation alongside trafficking. Perpetrators increasingly use coercion, financial enticement, and threats to involve trafficked children in criminal activities. This dual victimisation heightens trauma and complicates disclosure, making it essential for Barnardo's practitioners to adopt a trauma-informed, contextual safeguarding approach. It places great emphasis on the IGS Keyworkers to remain alert to indicators of CCE, ensure timely referrals to the National Referral Mechanism (NRM), and work collaboratively with statutory agencies to disrupt exploitation networks while prioritising the child's rights, safety, and recovery.

With this context, we welcome inclusion of the Independent Guardian Service in this guidance to capture evolution of risk and recognising the high risk and vulnerability of separated children and young people. However, we recommend reframing the 'Disruption of Exploitation' section on page 114 to better accurately reflect IGS:

"**Disruption of Exploitation:** The CVS plays a role in disrupting exploitation by identifying and supporting children and young people at risk. They work with social workers and the police to address issues related to CCE. For example, the role of the Independent Guardian is to support children and young people who have been or have potentially been victims of Human trafficking and/or exploitation. This is achieved through relationship-based work, practical support and an advocacy role as a bridge between the young person and statutory agencies."

Including the potential element as part of the role of IGS reflects their ability to assist with ongoing assessments and early intervention practice. It is also important to reflect the advocacy role for children and young people in relation to statutory agencies. Additionally, it should be reflected that the Independent Guardian service provides advocacy support and services for children and young people until the age of

21. This service approach recognises that vulnerability does not end at 18 and promotes a flexible, developmentally informed response that supports young people as they transition into adulthood.

We recommend revising the wording "soft intelligence" to reflect a collaborative, multi-agency approach to information sharing and professional liaison. The language should avoid terms that could imply surveillance, instead focusing on partnership, safeguarding, and empowering young people through coordinated approaches.

Considerations

We recommend further development on several areas to ensure the guidance remains comprehensive and responsive to emerging risks.

Variations of Exploitation

Online exploitation risks are described but lack specific practitioner actions for monitoring and intervention. Future updates should include digital safeguarding protocols, engagement strategies with technology platforms such as PSNI, and guidance on evidence collection for online harm. Additional information on emerging trends such as Com Groups, doxing, and high-risk apps should be incorporated in line with the NCS early identification notice (October 2025).

Inclusion of grooming gangs and group-based criminal exploitation would ensure relevance and continuous learning from UK-wide trends. Recommendations and safeguarding learning from the recent National Audit on Group-Based Child Sexual Exploitation and Abuse (June 2025) should also be referenced within the guidance tool. Recent NI safeguarding insights also highlight the use of e-scooters and e-bikes by street gangs to facilitate CCE, enhancing mobility and anonymity. This issue was reinforced by young people's feedback during the recent SBNI Public Consultation and should be reflected in this guidance report.

CCE Risk Assessment

There is currently no dedicated CCE risk assessment tool in use accelerating development of the proposed screening tool and providing interim guidance on adapting UNOCINI for CCE-specific indicators is essential. A comprehensive risk assessment model categorising varying levels of CCE would strengthen practitioner understanding of its interconnectedness with CSE and online safety. Future iterations

should also incorporate principles and processes
of the PREVENT duty to identify radicalisation and extremist views, clarifying their interaction with safeguarding decision-making. Recent
research jointly commissioned by University of Manchester and the University of Birmingham (2025) highlighted emerging concerns around passive expressions of misogyny among young boys, issues that typically fall outside the scope of the PREVENT reporting framework. There is also evidence of growing right-wing extremism, though this often manifests without a clearly defined ideology, instead presenting as mixed, unstable, and unclear belief systems. Northern Ireland is not immune to the risks posed by online environments, where young people may be exposed to harm, exploitation, and extremist content. Such emerging trends would be required to be captured within the NI equivalent of the PREVENT detection mechanism and further research would be needed to understand its interconnectedness with CCE.

We also seek clarity on the decision-making process, roles and responsibilities of safeguarding agencies and determination of risk levels within the tiered pathway approach. It is essential that opportunities to define and categorise these harms are explicitly referenced and aligned with the risk assessment tool currently in development. This will help ensure a consistent approach and application across all multi-agency partners.

Intersectionality

Intersectionality is acknowledged in the guidance however, we believe the guidance could be strengthened by including practical examples for culturally sensitive practice. Suggested additions include addressing misogynistic cultural norms and the normalisation of harmful behaviours that contribute to gender-based violence. These dynamics perpetuate inequality, diminish protective factors, and increase vulnerability to exploitation. Further development is also needed to provide examples of culturally sensitivity practice for ethnically diverse communities, particularly asylum-seeking and displaced young people, reflecting Northern Ireland's changing demographic landscape.

Transitional Safeguarding

We recommend explicitly highlighting the importance of transitional safeguarding between children's services and adult services. Integration of adult safeguarding practices and procedures in managing transitional safeguarding risks and future planning will ensure consistent safeguarding approach and similarity in managing safety planning and prevention. Collaborative working between children's and adult services will enable wrap-around support and reduce gaps that perpetrators may exploit when children

are faced with a cliff edge whereby children's service support is ending, and adult service support has yet to begin. Early identification of risk and joint planning will enable long-term, wrap-around support that addresses vulnerabilities holistically as well as taking into account the continuation of harm and risk of harm as a child transitions to adulthood. This approach ensures that safeguarding does not end at 18 years old but transitions seamlessly, reducing gaps that perpetrators may exploit and promoting sustained protection and resilience for individuals at risk. Development of collaborative information-sharing templates beyond existing LAC, CP, UNOCINI, and NRM processes would also support frontline practitioners and facilitate on the ground, daily information sharing.

Data and Monitoring

In order to inform service provision and evaluate impact, we recommend establishing evaluation metrics to monitor impact and capture data, including Section 75 equality data, key risk factors such as homelessness, poverty, mental and physical health. Additional metrics such as service engagement patterns, intervention o5utcomes, young person feedback and longitudinal tracking may help to provide a more holistic systematic overview regarding operational risk reduction and management.

Data should distinguish between children and young people accessing universal services e.g., schools, health services and those engaged with targeted or specialist interventions. This distinction is critical for identifying hidden vulnerabilities and unmet needs. For example, looked after children are widely recognised as being at heightened risk of child criminal exploitation however, they may not always present to specialist services or be flagged through traditional safeguarding pathways. Capturing this data could enable practitioners and agencies to identify trends, allocate resources effectively, and design proactive interventions that address both visible and less obvious forms of exploitation as they emerge.

Children's Voice

The guidance would benefit from the development of child-friendly and accessible versions to promote co-production and ensure lived experience remains central. Additional recommendations include creating youth forums to embed lived experience in service design and decision-making, fostering child-centred approaches and continuous improvement. The SBNI has previously produced child-friendly versions of guidance and strategies, such as the Online Safety Hub, which

improved accessibility for support resources and raised awareness among children and young people affected by these issues.

We also recommend including the meaningful feedback of children and young people shared through service providers, including VOYPIC. Although a child-friendly version of the guidance will be welcomed as an accessible tool for children and young people, we believe it would benefit practitioners to see the feedback from children and young people in this guidance.

Final Comments

Overall, the document promotes a holistic, child-centred approach that strengthens multi-agency collaboration and practitioner confidence in addressing exploitation and abuse. We welcome the key focus on the role of the community and voluntary sector as well as the inclusion of the Independent Guardian Service, with some amendments to better reflect the approach of the service. We have also provided some further recommendations for consideration to strengthen the guidance for practitioners, professionals, and children and young people, such as increased visibility of intersectionality, children's voice, and data and monitoring.