



Federation Northern Ireland

A response to
**Draft Northern Ireland Human
Trafficking and Exploitation Strategy
2015/16**

Department of Justice

21 August 2015

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Consultation response – key points

Women’s Aid Federation Northern Ireland welcomes the publication of the draft Northern Ireland Human Trafficking and Exploitation Strategy 2015/16 and the opportunity to comment on it on behalf of our local Women’s Aid groups.

Strategic priority 1

-) First responders: We urge the Department to consider designating Women’s Aid as a First Responder in line with GRETA recommendations¹, given our role in direct support of victims of human trafficking. This could be included in the strategy under both **Strategic Priorities 1 and 2**. The number of victims of human trafficking that actually report to police or go through the NRM is a fraction of the actual number of human trafficking victims. It is also well known that many victims of trafficking may be suspicious of statutory agencies, or may wish to seek help and support without engaging in the criminal justice process. Having designated first responders who are not a statutory body would encourage victims to engage and disclose, and may ultimately lead to more victims feeling that they are able to cooperate with police investigations. It is also in keeping with a victim’s right to get support even if they do not want to engage with the criminal justice system. In terms of identifying victims of trafficking, Women’s Aid is best placed to do this given our expertise in working with victims of domestic and sexual violence and human trafficking.

Strategic priority 2

-) Objective 2 – Protect and deliver support services to potential adult victims going through the NRM process. This objective should not only focus on the delivery of services, but should include an objective on improvement of service and ensuring that service is standardised and in line with best practice. As support service provider for all adult female potential victims of human trafficking, Women’s Aid is committed to providing the best support possible for all women who use our services. We believe this is best achieved through monitoring and evaluation of services, reviewing and updating practices in line with emerging best practice and compliance with a regulatory framework.
-) Objective 4 – raise awareness of the rights and entitlements of victims. It should be specified in the strategy that awareness-raising should also be for any organisation or

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http://www.coe.int/t/dghl/monitoring/trafficking/Docs/CommitteeParties/Recommendations/CP_2012_10_GBR_en.pdf

agency that comes into contact with victims. This will equip those organisations with the knowledge to ensure that they are upholding the rights of victims.

J) Objective 6 – appropriate access to legal representation. Women’s Aid signposts victims of human trafficking and exploitation to appropriate legal representatives and advisors who have experience working on human trafficking cases. This is essential given the complexities involved and the combination of immigration, criminal and human rights law involved. Legal representatives should therefore have the requisite expertise and understanding of issues relating to immigration, the NRM process, and the criminal law applicable to trafficking. Given this need for expertise, it is a great loss that the Law Centre NI has lost funding to provide immigration advice.

Women’s Aid is often faced with the situation where a victim has already acquired legal representation before she comes into our services. Difficulty arises in these circumstances if the appointed solicitor is not an expert in trafficking cases and related issues. It is in a victim’s interest to acquire expert legal representation to guide them through these complex processes, especially given their vulnerability due to the exploitation they have endured. Therefore we recommend that this strategy reflects the need for expert legal representation and advice, and makes it the responsibility of all first responders and those in initial contact with victims to signpost to appropriate and expert legal representation where possible.

J) Objective 8 – Reinforce capacity to respond to major human trafficking or slavery-like incidents. We support the objective to apply learning from major operations to future work. We recommend that the deadline of June 2015 is rescheduled to make sure it does not fall off the agenda, and that incorporating the lessons from previous operations takes place. We would also point out that learning should come not only from major operations but also from best practice elsewhere. This should also be incorporated into the plan.

J) Other issues under Strand 2. Women’s Aid recommends that an additional objective to incorporate the process for medical examinations of victims post-recovery is included in the strategy. At the present time, the process and funding for medical examination of large numbers of recovered victims is not in place. While we think the pathway to care generally works well, there are circumstances where victims may have been exposed to dangerous substances, may be suffering from malnutrition or may have contracted illnesses as a consequence of their ordeal. In such cases, it is imperative that victims are immediately given a medical to assess their wellbeing and provide any treatment necessary. This can include certain forensic testing that is expensive and may place a burden on GP surgeries. It is also necessary to establish a victim’s fitness to be

interviewed by police or otherwise. It is our view that a process for such scenarios should be established, and that funding for such testing should be covered under the umbrella of the rescue operation.

Strategic Priority 3

- J Objective 5 – Understand and reduce demand for the services of trafficked and exploited people. Under this objective, actions should include full implementation of Trafficking Act and Modern Slavery Act, including clauses on prosecuting buyers of sexual services. This is directly relevant to the projected outcome of making Northern Ireland less attractive as a destination for traffickers / enslavers.

Strategic Priority 4

- J Page 25 – Partnership working is also about acknowledging that expertise on different aspects of the response to human trafficking comes from different places, and that the right expertise is essential to deliver on all 4 strategic priorities.
- J Objective 2 – Strategic priority 4 should include an objective on cooperation between statutory agencies and support service providers such as Women’s Aid.
- J Objective 3 – Appropriate information sharing. An objective to ensure correct information-sharing procedures are being adhered to should be included in this section. For example, Women’s Aid has been engaging with the Information Commissioner’s Office to ensure that we are complying with rules and regulations on handling victims’ information.
- J Objective 4 – effective cross-border cooperation. Under this objective, we recommend the inclusion of relationship development between support service providers and cross-border statutory agencies. For example, Women’s Aid has continued to work to develop and improve working relationship with An Garda Síochána. We also recommend that cross-border joint training should be included here, and that such training should be delivered by experts in human trafficking.

General Comments

- J Some of the timescales in the draft document are out of date. These should be reviewed and updated to a new timescale so that none of the actions drop off the priority list.

Contact Details

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