

women's aid

Federation Northern Ireland

women's aid

Belfast and Lisburn

Consultation on the Draft Modern Slavery Strategy 2021/2022

7th January 2020

Women's Aid Federation Northern Ireland

The Annex,
30 Adelaide Park,
Belfast
BT96FY

Tel: 02890 249041

Fax: 02890 239296

General Email: info@womensaidni.org

Website: www.womensaidni.org

Who We Are

Women's Aid is the lead voluntary organisation in Northern Ireland addressing domestic and sexual violence and providing services for women and children. Women's Aid exists to challenge attitudes and beliefs which perpetuate domestic violence. We work to promote healthy, non-abusive relationships.

Our vision is the elimination of domestic and sexual violence

What We Do

Women's Aid supports all women and children affected by domestic violence. We work to help women and children be safe, to break free from the cycle of violence, and to rebuild their lives. Women's Aid has nine local groups and one regional umbrella body covering the whole of Northern Ireland, and our wraparound services are available across Northern Ireland. Our core work includes:

- Refuge accommodation for women and their children suffering domestic violence.
- Support services to enable women affected by domestic and/or sexual violence to rebuild their lives and the lives of their children.
- Support services for children and young people who have experienced domestic violence.
- Preventative education programmes in schools and other settings.
- Educating and raising awareness among the public, media, police, courts, social services, and other agencies of the impact of domestic and sexual violence.
- Advising and supporting other agencies in responding to domestic & sexual violence.
- Working in partnership with other agencies to ensure a joined-up response to domestic and sexual violence.

Throughout this response, the term "Women's Aid" refers to the overall Women's Aid movement in Northern Ireland, including our local groups and Women's Aid Federation.

Domestic & Sexual Violence in 2019-20: a year in numbers

- **561** women and **316** children stayed in a Women's Aid refuge.
- **36** pregnant women were supported in refuge and **205** pregnant women accessed outreach services.
- **11** babies were born to women in refuge.
- **5,536** women and **5,143** children accessed Women's Aid outreach services, enabling them to get support while staying in their own homes.
- **1,197** women took part in programmes run by Women's Aid, including our *Journey to Freedom* and *You and Me, Mum* programmes.
- We trained **168** teachers across **105** primary schools to deliver the *Helping Hands* preventative education programme.

Domestic Violence in Northern Ireland: Trends

- Domestic violence is a violation of Article 5 of the UN Universal Declaration of Human Rights – that “*no one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment*”.
- The *Stopping Domestic & Sexual Violence and Abuse Strategy* estimates the cost of domestic and sexual violence in Northern Ireland to be **£931 million**.
- UNICEF research released in 2006, showing per capita incidence, indicates that there are up to **32,000 children** and young people living with domestic violence in Northern Ireland.
- **69%** of all domestic abuse crimes were female and 31% were male. Of all offenders dealt with by police in 2018/19 in connection with domestic abuse crimes that resulted in an outcome, 86% were male and 12% were female.¹

Crime Statistics 2019-20

- Domestic Violence is a crime. Domestic abuse crimes (**18,640**) accounted for **17.5% of all crime** reported to the PSNI.
- Police responded to a domestic incident **every 17 minutes** of every day of the year.
- Between 2019 – 2020 (statistics captured over financial year), there were **2 murders** with a domestic abuse motivation in Northern Ireland and all victims were female. In 2017, Northern Ireland there was the joint highest level of femicide in Europe per 100,000 people.

¹Findings from the PSNI Trends in Domestic Abuse Incidents and Crimes Recorded by the Police in Northern Ireland 31 March 2019 N.B. “Adult” defined as aged 18 and over

Introduction

Women's Aid welcomes the opportunity to submit evidence and information the draft Modern Slavery Consultation. Women's Aid Federation NI have produced the response in consultation with and on behalf of Belfast and Lisburn Women's Aid who manage the trafficking programme.

This submission will be structured around the three strands of the strategy. Some objectives do not fall under the expertise of our organisation and as a result have been left out of the submission.

Submission Response

Pursue

2.1.1 To ensure that modern slavery legislation is used effectively and remains relevant and fit for purpose.

We have no comments on this facet of the strategy.

2.1.2 To ensure and effective operational response

Belfast and Lisburn Women's Aid have a good working relationship with the PSNI. However, it is our position that closer involvement between specialist support services and the PSNI can procure more positive results for trafficking victims. There have been previous occasions where Women's Aid have been involved earlier in cases which has ensured more support. On occasions where there is mistrust of the police, particularly where women may be fearful of being returned to their country of origin, victims may be more able to open to support organisations. This means there can be earlier intervention, which results in more effective support for the victims and potentially earlier information on perpetrators. Women's Aid recognises that the police have a close working relationship with Migrant Help and would advocate for a similar model of working with Women's Aid so that we can ensure the best support outcomes for women.

The Tilly Project is an extremely useful programme operating in England and Wales which offers support to women who are pre and post NRM linking trafficked women with homelessness. It is our position that this is a model that has successful outcomes, and it has been noted by the police as an invaluable resource. It is our position that the Tilly model should be implemented in NI as a way to support women who are post NRM. This or a similar model should be appropriately funded and resourced to ensure that victims are getting appropriate support that adequately meets their needs.

2.1.3 To ensure effective development, learning and identification of best practice across the criminal justice system

We welcome the strategy's commitment to the pursuit of best practice. It is our view that, while policing units specialised in dealing with trafficking cases do exceptional work, on PSNI officers on the ground could benefit from additional training on human trafficking, particularly sex trafficking. Ensuring that all officers have a good grasp of the impact of human trafficking and how it presents could help in identifying cases, charging perpetrators and referring victims into NRM.

Funding services appropriately is vital to ensuring the effective pursuit of perpetrators of human trafficking. Women's Aid would note that when funding was first allocated for specialist services, the rates of human trafficking being detected were much lower than the issue as it exists within our society now. Through improved models of detection and pursuit, more victims than ever are being identified. We would note the importance of ensuring that funding is reflecting the higher number of referrals to NRM.

Protect

Women's Aid welcomes the overall objectives laid out within the "Protect" strand of the strategy. The success indicators are victim focused and we commend the Department for that. One of the criticisms levied at UN anti-trafficking intervention models is that they are too focused on prosecution and lack a victim-centric approach to protecting survivors human rights². Survivors of human trafficking are not a homogenous group. An intersectional, victim centric approach is key to protecting survivors of sex trafficking from marginalized groups, to ensure that their specific needs are being addressed at all times and that we are applying a holistic model of specialized support for all victims.

2.2.1, to proactively identify and report victims of modern slavery

We would reiterate our point from the Pursue strand regarding more effective communication between departmental agencies and civil sector support organisations. Victims of domestic abuse crimes are much more likely to seek community-based support rather than contacting state agencies, this pattern is often mirrored in other types of abuse. It is our opinion that victims of sex trafficking can more easily open up to community support practitioners than they can to official channels, particularly when they hold concerns around immigration status. Issues around victims not identifying themselves as victims because they have been coerced into believing that they are willing participants need to be addressed more effectively if victims are to be proactively identified. This will require training across departmental agencies as well as a close working relationship with support providers. An inability to identify oneself as having been abused is a common characteristic in women who have been coercively controlled in domestic abuse relationships. _____ identifies a number of ways that domestic abuse and human trafficking can intersect and suggests that domestic

² [Sex Trafficking and the State: Applying Domestic Abuse Interventions to Serve Victims of Sex Trafficking \(researchgate.net\)](#)

abuse interventions can be useful in situations where women have been trafficked for sex³. Women's Aid would suggest that this evidences the need for closer working relationships with state agencies and our support services going forward.

In Wales and certain areas in London, MARACs are used in conjunction with trafficking victims. These are implemented in a similar way to MARACs on domestic abuse, where they allow for sharing of pertinent information between relevant agencies supporting a victim. This model could be applied in Northern Ireland to ensure that all relevant bodies are aware of vital information in order to support a victim. MARACs in domestic abuse cases allow for better pursuit of perpetrators and protection of victims, meaning that a similar model for trafficking victims could positively impact on two strands of the Modern Slavery Strategy.

2.2.2 Provide victims of modern slavery with appropriate and effective support

Under this objective, Women's Aid would identify a number of practical ways to support victims of trafficking. Namely access to well trained solicitors who have specialist knowledge around trafficking. We have noticed that this is often a barrier to victims getting appropriate legal information. Trafficking is often misinterpreted as an immigration issue, which misrepresents victims. It is important that victims have access to specialist legal professionals who can effectively interpret their situation and provide victims with information without adding additional stress. In a similar vein we would note that investment in legal aid for victims of human trafficking.

Women's Aid would note that practical pathways for health would be an effective way to ensure that victims of trafficking receive appropriate support. Ensuring that victims are registered to doctors and dentists for example, would be a practical way to ensure that they have access to medical care, appropriate health screenings and regular checkups. If this was a commitment within the strategy it would take a considerable amount of administrative pressure off support services who would otherwise be putting these pathways in place.

2.2.3 Provide Specialist support to child victims of modern slavery that recognises their unique vulnerabilities

Women's Aid welcome the objective to provide specialist support for child victims of modern slavery. However, we would note the importance of appropriate funding allocation to these commitments in order to ensure that these targets can be met, and child victims can be provided with specialist support.

We would like to take this opportunity to identify a gap in provisions for child victims of modern slavery. Children conceived as a result of human trafficking do not have legal victim status, although a debate to change the law on the victim status of children conceived as a result of rape is ongoing. It is a generally accepted norm that women trafficked for sex and prostituted are victims of rape, as they have been coerced and forced into having sex which

³ [Sex Trafficking and the State: Applying Domestic Abuse Interventions to Serve Victims of Sex Trafficking \(researchgate.net\)](https://www.researchgate.net/publication/351111111)

nullifies consent⁴. There are a number of risk factors associated with the wellbeing of children born as a result of rape; pregnancy and delivery, poor parent-child relationships, discrimination and stigmatisation and identity issues⁵. Children often experience trauma and feelings of guilt as a result of learning the details their conceptions. Therefore, it is our position that children born as a result of human trafficking should be afforded victim status and be covered by the strategy's objective.

Trafficking victims who have become pregnant as a result of rape in Northern Ireland currently do not receive any additional financial support from the DoJ for their dependent. As it stands currently, a woman who is a victim of trafficking living in Women's Aid services receives £70 per week from DoJ and no additional support for any children they may have. This is not the case for women living within NAS accommodation. A woman who has given birth to a child while engaged in sex trafficking rings can expect no additional support for their child, nor can she apply for other financial aid to support her child. She does not qualify for child benefit, free school meals, school uniform vouchers etc. These are children that are born in Northern Ireland, and therefore are citizens, there is a duty to provide a social security safety net for those children.

We would also note the additional strain that not providing financial support for these children puts on already stretched civil sector and charity organisations. Where there is no state support for children, third sector practitioners must create additional infrastructures of support, which creates financial burdens on under-resourced organisations and also takes up staff time to create these support structures which impedes on time allocated to their actual workload.

Therefore, Women's Aid would advocate for the additional commitment from the department to provide financial aid for children born to victims of human trafficking to be worked into the strategy. It is our position that this is a significant gap that needs to be addressed. We would suggest a model similar to that of asylum seekers, where financial aid is allocated per person per household, to ensure that children who are secondary victims of human trafficking receive adequate support.

Prevent

Women's Aid commend the inclusion of success outcomes dealing with both offenders and victims. We appreciate the inclusion of victim led commitments and objectives as this encourages the assessment of needs of victims as opposed to a reduction of offending.

⁴ [What is Choice? Examining Sex Trafficking Legislation Through the Lenses of Rape Law and Prostitution \(stthomas.edu\)](http://stthomas.edu)

⁵ E Van Ea and RJ Kleber 'Growing Up Under a Shadow: Key Issues on and Treatment of Children Born of Rape

2.3.1 Reduce vulnerability to exploitation and re-exploitation

Women’s Aid welcomes the continued engagement on issues facing “at-risk” communities. We would encourage the inclusion of communities under paramilitary influence under “at-risk” groups. There are long term links in Northern Ireland between paramilitary groups, sexual exploitation and sex trafficking⁶. While young men in paramilitary run communities are often recruited into these organisations, there is evidence that young women in these areas are vulnerable to being sexually exploited and coerced into sex trafficking rings⁷. Formal recognition of paramilitary groups as conduits of human trafficking within the modern slavery strategy would strengthen prevention within the Northern Irish context.

2.3.2 Strengthen cross-sector resilience against modern slavery

The commitment to strengthening cross sector responses to modern slavery is commendable. We would assert that a cross-departmental approach to human trafficking is important especially as the DoH manage the exiting prostitution campaign which is a vital pathway to support for many women who have been trafficked. We would note that, as previously mentioned, MARACs on human trafficking cases could encourage cross-departmental and cross-agency responses to this issue. We would also advocate for a closer working relationship between law enforcement agencies in Northern Ireland and the UK Human Trafficking Commissioner.

We would note that training across governmental departments, the criminal justice system and public health agencies would go towards ensuring more understanding of human trafficking and modern slavery, increase awareness on specific issues arising as a result of human trafficking and improve responses to victims as they come forward.

2.3.3 Raise public awareness to reduce demand and increase reporting

We support a public awareness campaign, particularly where it is geared towards signposting victims to support services. We would stress the importance of ensuring that this campaign is intersectional and accessible to all potential victims. Ensuring that the information is accessible in different languages and to members of the public who have visual or hearing impairments.

⁶ [Crossing20Borders20trafficking20report.pdf \(niwaf.org\)](https://www.niwaf.org/crossing20borders20trafficking20report.pdf)

⁷ Ibid