

Human Trafficking and Exploitation  
(Independent Guardian) Regulations  
Family and Children's Policy Directorate  
Department of Health, Social Services and Public Safety  
Room A3.3, Castle Buildings  
BELFAST  
BT4 3SQ

3 November 2015

Dear Colleague,

Thank you for the opportunity to respond to the draft Human Trafficking and Exploitation (Criminal Justice and Support for Victims) (Independent Guardian) Regulations (Northern Ireland). NSPCC in Northern Ireland welcome this provision of improved support and assistance for young victims of trafficking.

In recent years, the NSPCC's Child Trafficking Advice Centre (CTAC) have had significant involvement in supporting service development and strengthening multi-agency approach for separated and trafficked children in NI. CTAC are designated as a First Responder for the National Referral Mechanism, and the multi-disciplinary team work in partnership with the Home Office, UK Human Trafficking Centre and the Child Exploitation and Online Protection (CEOP) to support child victims of trafficking. Since it was established in 2007, CTAC have worked on more than 1,147 cases of child trafficking, relating to sexual and criminal exploitation, domestic servitude and benefit fraud. CTAC therefore bring a wealth of experience and knowledge in this area, an area that is relatively new to NI. CTAC have provided input and training to both the Regional Network for Trafficked and Separated Children and the Serious Organised Crime Taskforce.

In considering the proposed draft Independent Guardian Regulations, there is broad agreement with all of the contained draft Regulations. We acknowledge that the Guardian will require registration with the Office of Immigration Services Commissioner (OISC), and specialist training and knowledge in child development, welfare and immigration law. However, the essential

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criteria must be realistic and we would urge caution against setting the standards too high and therefore too restrictive for potential candidates. This will be a social work service and most professional staff in NI have yet to gain experience in the complex areas of immigration. As such, we agree that completion of formal training, registration with appropriate regulation bodies to assist continued professional development can be undertaken within a defined period of time following appointment.

Yours faithfully,



**Neil Anderson**

National Head of Service - NI