Child Criminal Exploitation - Safeguarding Children and Young People from Abuse and Exploitation

July 2021

“No violence against children is justifiable; all violence against children is preventable” *(2006 UN Study on Violence against Children)*

Summary

The Northern Ireland Commissioner for Children and Young People (NICCY) has long expressed concern that, in the legacy of the conflict, children in communities in Northern Ireland continue to be subject to threats, intimidation, violence and exploitation by powerful actors, groups and gangs and that government and statutory agencies must work together as a priority to safeguard young people in such situations. While at times aspects of this are highlighted in public and media debates, such as, in relation to high profile assaults or episodes of civil unrest, much of the full range of harm and abuse which affects children and young people’s daily lives remains marginal to public and political discussions.

Northern Ireland has faced many periods of instability, conflict, crisis, and tension, not least during the unprecedented circumstances of the COVID-19 pandemic. Regardless of wider events and circumstances, children and young people throughout Northern Ireland should be safe in their homes and in their communities, villages, towns and cities.

The Northern Ireland Commissioner for Children and Young People calls for:

**A unified strategic response to protect children from harm including abuse, violence, coercion and exploitation by organised gangs and groups. This response must be embedded in safeguarding and children in need processes and must:**

1. Raise awareness of child abuse and exploitation in this context: and build confidence in the role of statutory agencies to support and protect children, families and communities;
2. Prevent harm and abuse to children and young people: through sustained activity to reduce community vulnerability to violence and exploitation, including those actions set out in the Action Plan on Tackling Paramilitary Activity, Criminality and Organised Crime;
3. Protect and intervene where children are abused and exploited: ensuring that robust safeguarding procedures are in place and that agencies are working together to protect children and support their recovery. This will require the ongoing involvement of children’s social care in all aspects of the strategic response and the review of key guidance and procedures, including Co-operating to Safeguard Children and Young People and Working Arrangements for the Welfare and Safeguarding and Trafficking and Modern Slavery procedures to make sure that consistent definitions and agreed referral and response pathways to all forms of harm, including criminal exploitation, are in place.
4. Pursue those who seek to harm, abuse and exploit children: through effective identification, disruption, investigation and prosecution of offenders. This will require the review of available criminal offences and arrangements to assess where these and approaches to investigation and prosecution may need strengthened.

This strategic response must be supported by data which identifies the numbers of children known to be at risk and directly affected.

And, importantly, children, young people, families and community and voluntary organisations should be involved in the development of this strategic response.

Introduction

The Commissioner for Children and Young People (NICCY) was created in accordance with ‘The Commissioner for Children and Young People (Northern Ireland) Order’ (2003) to safeguard and promote the rights and best interests of children and young people in Northern Ireland. Under Articles 7(2) and (3) of this legislation, NICCY has a mandate to keep under review the adequacy and effectiveness of law, practice and services relating to the rights and best interests of children and young people by relevant authorities. Under Article 7(4), NICCY has a statutory duty to advise any relevant authority on these matters.

The Commissioner’s remit includes children and young people from birth up to 18 years or 21 years, if the young person is disabled or is care experienced. In carrying out her functions, the Commissioner’s paramount consideration is the rights of the child or young person, having particular regard to their wishes and feelings. In exercising her functions, the Commissioner has regard to all relevant provisions of the United Nations Convention on the Rights of the Child.

Children’s rights and safeguarding

The United Nations Convention on the Rights of the Child (UNCRC)[[1]](#footnote-1) sets out minimum standards for children’s rights across all areas of their lives such as, civil and personal protections, health, education and welfare. The four guiding principles which flow through the Convention are: children’s right to non-discrimination; right to survival and development to the highest level; to their best interests being a primary consideration; and to their voice being heard in all matters affecting them. The safeguarding provisions within the UNCRC relate to the most fundamental rights that should be afforded to all children and young people in Northern Ireland – rights to life and protection from all harm, abuse, exploitation and violence including torture or other cruel, inhuman or degrading treatment or punishment. This includes specific protections from: all forms of physical and mental violence, injury or abuse, sexual abuse and exploitation and neglect or maltreatment; protection from abduction, sale or trafficking; from all forms of economic exploitation; and from use in the illicit production and trafficking of narcotic drugs and psychotropic substances.

The Convention also highlights that, as rights-holders, children have special rights to be supported in their recovery from abuse and that the State party, or government, has an obligation to ensure that appropriate measures and procedures, including prevention measures and court and judicial processes, are in place to realise these rights. The UNCRC also affords particular rights to any child in contact with the criminal justice system, including child defendants, while the Optional Protocol to the Convention on armed conflict provides further protections to children in the context of recruitment and involvement in armed conflict in relation to both state and non-state forces.[[2]](#footnote-2)

In 2016, the UN Committee on the Rights of the Child’s Concluding Observations set out a wide range of recommendations to the UK and devolved Governments in order to better fulfil children’s rights in this area including that they must: strengthen data collection and recording in relation to violence, abuse and neglect; increase the number of social workers and strengthen their capacity to address violence against children; take immediate and effective measures to protect children from violence by non-State actors involved in paramilitary-style attacks and from recruitment by such actors into violent activities; to ensure the recommendations of the Independent Inquiry into Child Sexual Exploitation are implemented; and to further develop comprehensive support services for children who are at risk of or have been subject to violence, abuse and exploitation. [[3]](#footnote-3)

The rights of the Convention are interdependent and indivisible – like children and young people’s lives they cannot be compartmentalised. Governments and statutory agencies not only hold special obligations to prevent harm to children and young people and to take measures to protect them when they are at risk children but also to investigate and take action against those who seek to abuse and exploit them.

The Legacy of the Conflict

While Northern Ireland as a whole has been impacted by the conflict, the nature and extent of this has varied across communities and circumstances and the legacy of the ‘Troubles’ on many children, families and the areas in which they live is still heavily felt. As NICCY has previously highlighted, segregation and community division continue to be a part of daily life for many children and research demonstrates that there are increased levels of child poverty, childhood mental ill-health, educational inequalities and disabilities in the areas which have suffered most as a result of the conflict.[[4]](#footnote-4) While there has been progress in addressing key aspects of the conflict, the existence of paramilitary and organised crime groups and gangs within and across communities, their position in influencing and controlling communities and their role in criminal activities remains and has been assessed as a continuing “clear and present danger”.[[5]](#footnote-5) For such communities, structural issues, such as lack of investment and economic and social inequality can combine powerfully with intergenerational trauma, concerns about the legitimacy or effectiveness of government and statutory agencies, lack of political consensus in addressing key legacy issues and contested ideas of identity and belonging to create particular conditions of vulnerability for children and young people.

Commentators have noted the extent to which experiences of community violence and trauma can shape daily life in some areas[[6]](#footnote-6) and the Children and Young People’s Strategy regards exposure to conflict related intergenerational trauma as an adverse childhood experience[[7]](#footnote-7), with exposure to such childhood adversities underpinning much current focus in how government and statutory agencies are seeking to support young people and families and improve outcomes for children.[[8]](#footnote-8) While it is difficult to establish the scale of harms that young people are exposed to and the ongoing impact of the conflict on their communities, there are some indicators of this. For example, official statistics report that between June 2020 – May 2021 there were 2 security related deaths, 17 bombing and 41 shooting incidents with 19 paramilitary style shootings and 40 paramilitary style assaults (one of which involved a child under 18 year).[[9]](#footnote-9) It is also of note that the recent Youth Wellbeing Prevalence Survey found that more than 2 in 5 young people reported that paramilitary groups create fear and intimidation in their area with more than half agreeing or strongly agreeing that paramilitary groups contribute to crime, drug dealing and anti-social behaviour in their area.[[10]](#footnote-10) It is, of course, important to highlight that without more comprehensive data, the number of children and young people subject to such harms and the full range of these will remain unknown.

NICCY has received reports from officials, voluntary and community groups and young people themselves about the wide range of persistent and serious harms they are subject to. The Commissioner has previously brought together stakeholders to address assaults on children and young people within particular areas but is mindful that concerns about young people’s safety includes not only threats of and actual assaults (including common assault, assault occasioning actual and grievous bodily harm), beatings and shootings but also: threats to life if children do not leave specified areas or comply with stated requests; the exploitation of young people in relation to the development of debts; exploitation into criminal activities such as drug distribution and supply; involvement in the intimidation of or harm to others; involvement of children in public order offences, violent protest and civil unrest; and young people being recruitment into or claimed by paramilitary or criminal groups. NICCY is also aware of concerns regarding the presence or involvement of such groups and gangs or individuals associated with these in Child Sexual Exploitation.[[11]](#footnote-11) We also acknowledge that the nature of harms and abuses that children and young people will be at risk of, the profile of groups and gangs involved and the dynamics of this may vary considerably across communities and over time.[[12]](#footnote-12)

While it is important to recognise the role of the legacy of the conflict and history of paramilitarism in Northern Ireland, particularly in relation to how groups and gangs may seek to use ideas of identity, belonging and community and the defence or promotion of these in their activities, NICCY is clear that the concerns outlined in this paper relate directly to the abuse and exploitation of children and young people and must be recognised and named as such. We also note that the instability of recent months and current political uncertainty has heightened the need for all those engaging in debate, including elected representatives and the media, to look with urgency at these concerns and to remain mindful of the tone and language in which they are discussed.

Child exploitation and contextual safeguarding

Approaches to child protection and safeguarding have traditionally developed with a strong focus on children’s early years and on harm that occurs within family settings although more recently the need for responses to effectively address sources of abuse which occur elsewhere in young people’s lives has been highlighted – starkly illustrated by investigations and reports into failures to respond to CSE. ‘Contextual safeguarding’ seeks to take better account of the risks and harms that young people can be exposed to outside of their home environment, highlighting the need to identify, understand and respond to abuse and exploitation regardless of the place or context in which it occurs.[[13]](#footnote-13) Associated with work on CSE and young people and gang violence, this highlights that interventions must be effective in the environments in which children are exposed to risk and violence, including neighbourhoods and public spaces, and that as there will likely be many children at risk in the setting, they must have a wider focus than on an individual child.[[14]](#footnote-14)

Public health approaches to violence reduction, which have been under development in this context in Northern Ireland[[15]](#footnote-15), can also be understood as seeking to address the levels of harm and violence in community spaces with both these models and initiatives, such as Violence Reduction Units, requiring not only that underlying conditions are addressed but also that multi-agency and partnerships approaches are developed and deployed. A key aspect of such perspectives has been to highlight that children must be seen as children first and that they are being subject to abuse and exploitation, challenging preconceptions of young people simply as troublesome and troubling, as making ‘lifestyle choices’ about their associations with those who seek to harm them or as offenders.

Studies on gang violence highlight thecomplex dynamics of children’s vulnerability and exploitation that are often at play[[16]](#footnote-16) and we note that many have had adverse childhood experiences. Indeed, practitioners from statutory and voluntary and community organisations have spoken passionately to NICCY about the levels of vulnerability they identify amongst young people who can become exploited, abused, recruited or ‘claimed’ by organised groups in their communities. Such vulnerability, echoing the findings of research on a range of other forms of abuse against children, may be associated with prior experiences of abuse and exposure to violence, mental health difficulties, exclusion from education, drug and substance use, lack of self-esteem or identity and lack of opportunity or hope for the future.

The theme of young people being provided with drugs and then developing, at times very significant, drug debts which must be paid through involvement in the movement and distribution of drugs or other activities (including activities which may intimidate, harass or harm others) and the pace at which this can escalate has been a consistent theme in concerns described to us, as have expectations that young people will be present and involved in protest, unrest and associated activities. The challenge for young people of removing themselves from such debts and the dynamics of exploitation associated with this can be overwhelming and the particular, but not exclusive, impact of many of these forms of harm on males in their adolescence cannot be ignored. NICCY notes that the development of debts or forms of ‘debt bondage’ are recognised as a key element in modern slavery and will return to this concept. It must be remembered that such exploitation is also set against the broader range of harmful activities of organised groups and gangs, including threats to life, shootings and assaults, exclusion from areas and harassment and intimidation.

In Northern Ireland, the framework of Fresh Start and the Action Plan on Tackling Paramilitary Activity, Criminality and Organised Crime and commitments of New Decade New Approach seek to address the legacy of the conflict on communities. For example, the Action Plan includes specific areas to support those who may be particularly vulnerable to ‘criminal control’ and ‘paramilitary activity’, to respond to underlying social and economic conditions and improve young people’s educational and employment prospects.[[17]](#footnote-17) In considering safeguarding guidance in Northern Ireland, this recognises that, in the context of the conflict, “children may also be abused or exploited by adults who hold power within their communities …” and notes that young people may be threatened with violence and subject to forced expulsion from their homes and local areas by those linked to organised gangs or groups.[[18]](#footnote-18) The development of Threat to Life Practice Guidance which defines such threats as “an extreme form of child abuse” [[19]](#footnote-19) and seeks to ensure a co-ordinated response to these is welcome and reflects the depth of harm contained in such threats.

However, regional guidance does not directly explore the broader range of harms that children may be subject to within community contexts. For instance, while exploitation is acknowledged elsewhere within Co-operating to Safeguard Children and Young People and it is recognised that abuse associated with this may fit within the existing child protection framework of physical, emotional, sexual abuse and neglect and so trigger safeguarding procedures, exploitation by groups and gangs in the context of the legacy of the conflict is not explored.[[20]](#footnote-20) A similar theme is apparent in Northern Ireland’s guidance on Trafficking and Modern Slavery which, while highlighting the need to recognise child exploitation and follow safeguarding procedures, does not draw attention to this in relation to exploitation by organised groups and gangs within communities.[[21]](#footnote-21) While we understand this document is due to be revised, it is of note that currently neither this nor the safeguarding guidance discuss the need for contextual safeguarding or identify the full nature of child exploitation as it is addressed in equivalent guidance elsewhere. For example, Home Office guidance clearly states that the involvement of young people in criminal activities is Child Criminal Exploitation (CCE), a form of modern slavery which

“*occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology*”.[[22]](#footnote-22)

Noted examples, such as, acquisitive crime and drug cultivation and production are given and listed warning indicators, including, young people carrying or selling drugs, being associated with gangs, going missing, carrying weapons, being assaulted or injured or having significant changes in emotional wellbeing are cited.

While ideas of exploitation and slavery may be associated with the trafficking of children or adults from other countries or with particular forms of abuse, many of the dynamics of exploitation, the harms to children and the range of activities involved are mirrored in the context of paramilitary or criminal groups/gangs operating in communities. For instance, ‘County Lines’, which is a particular model of distributing illegal drugs often involving children is recognised as a form of CCE with UK referrals for child victims of modern slavery increasing significantly directly due to such cases in England now following associated referral procedures (through the National Referral Mechanism).[[23]](#footnote-23) The UK Independent Anti-Slavery Commissioner has noted the low referral rates for children in Northern Ireland and has stated that statutory agencies view that County Lines is not a significant issue here.[[24]](#footnote-24) This is not a perspective shared by all stakeholders who have highlighted concerns to us about the use of young people in the movement of drugs within and across geographical areas. Importantly, Home Office guidance is also clear that in addition to safeguarding procedures being instigated, referral in relation to modern slavery should trigger the gathering of evidence about abusers[[25]](#footnote-25) and ensuring that there is a strong criminal justice focus on taking action against those who exploit and abuse children is a key aspect of seeking to effectively safeguard young people in this context.

Conclusion

NICCY is aware of the concerted work being undertaken in areas to support and protect children and young people in their communities across Northern Ireland. This ranges from ongoing community based support, to specific responses to address threats to life, to bespoke interventions to protect children and young people during periods of unrest and disturbances. It is important to acknowledge the vital role of community and voluntary organisations in this work, as well as the involvement of many statutory agencies, such as the Education Authority and PSNI. However, the consistent and active presence of safeguarding agencies and children’s social care (identified as having a key role in partnership working elsewhere) is less clear. NICCY notes this may well reflect the current lack of robust safeguarding policy or procedures in relation to the full range of violence and abuse which children are subject to within their communities from organised groups and gangs. This raises questions about how well the framework for safeguarding children and young people currently protects those who come to harm outside the home in these contexts. This must be addressed, through a safeguarding lens, as a matter of priority.

In order to be effective, the response to this abuse and exploitation of children and young people must: reflect the obligations of the UNCRC; be collaborative across government departments, statutory agencies and voluntary and community organisations; address how such harms to children will be prevented, how young people at risk will be protected and the steps that will be taken to disrupt and pursue perpetrators. We note that this framing of prevention, protection and pursuit reflects NICCY’s previous work on government responses to CSE[[26]](#footnote-26) and the structure of Northern Ireland’s Modern Slavery and Human Trafficking Strategy.[[27]](#footnote-27)

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And, importantly, children, young people, families and community and voluntary organisations should be involved in the development of this strategic response.

Therefore, the Commissioner urges the Minsters for Health and Justice and their departments and agency to take into account the calls made in this advice paper, which is provided within her statutory role under Article 7(4) of ‘The Commissioner for Children and Young People (Northern Ireland) Order’ (2003)’.

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2. UNCRC (2002) Optional Protocol to the UNCRC on the involvement of children in armed conflict. Available at: <https://www.ohchr.org/en/professionalinterest/pages/opaccrc.aspx> [↑](#footnote-ref-2)
3. UN Committee on the Rights of the Child (2016) Concluding Observations on the fifth periodic report of the United Kingdom of Great Britain and Northern Ireland. Available at: <https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC/C/GBR/CO/5&Lang=En> [↑](#footnote-ref-3)
4. NICCY (2018) Advice to NIO on addressing of legacy of the past. Available at:

   <https://www.niccy.org/publications/2018/october/05/response-to-the-northern-ireland-office-s-nio-s-consultation-paper-addressing-the-legacy-of-northern-ireland-s-past/> [↑](#footnote-ref-4)
5. Independent Reporting Commission (2020) Third Report; p8. Available at:

   <https://www.ircommission.org/sites/irc/files/media-files/IRC%20Third%20Report_0.pdf> [↑](#footnote-ref-5)
6. Walsh C. (2021) Common Purpose: A model for enhancing complex services designs in the prevention of higher harm youth violence. Available at:

   <https://www.youthandpolicy.org/articles/common-purpose/> [↑](#footnote-ref-6)
7. NI Executive (2020) Children and Young People’s Strategy 2020-2030. Available at:

   <https://www.education-ni.gov.uk/sites/default/files/publications/education/final-execuitve-children-and-young-people%27s-strategy-2020-2030.pdf> [↑](#footnote-ref-7)
8. See for example the Safeguarding Board for Northern Ireland. Available at:

   <https://www.safeguardingni.org/aces-and-trauma-informed-practice> [↑](#footnote-ref-8)
9. PSNI (2021) Security Situation Statistics June 2020-May 2021. Available at: <https://www.psni.police.uk/globalassets/inside-the-psni/our-statistics/security-situation-statistics/2021/may/security-situation-statistics-to-may-2021.pdf> [↑](#footnote-ref-9)
10. Bunting L. et al (2020) The Mental Health and Children and Parents in Northern Ireland: Results of the Youth Wellbeing Prevalence Survey. Available at: <http://www.hscboard.hscni.net/download/PUBLICATIONS/MENTAL%20HEALTH%20AND%20LEARNING%20DISABILITY/youth-wellbeing/Youth-Wellbeing.pdf> [↑](#footnote-ref-10)
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    Marshall K. (2014) Report of the Independent Inquiry into CSE in Northern Ireland. Available at:

    https://www.rqia.org.uk/RQIA/files/37/379f52ad-b99e-4559-847e-e2688e0648c6.pdf [↑](#footnote-ref-11)
12. See for example Independent Reporting Commission (2020) Third Report. Available at:

    <https://www.ircommission.org/sites/irc/files/media-files/IRC%20Third%20Report_0.pdf> [↑](#footnote-ref-12)
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    https://csnetwork.org.uk/assets/documents/Contextual-Safeguarding-and-County-Lines-Briefing\_-Wroe-Oct-2019-FINAL.pdf [↑](#footnote-ref-13)
14. ibid.  [↑](#footnote-ref-14)
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    <https://www.youthandpolicy.org/articles/common-purpose/> [↑](#footnote-ref-15)
16. English Children’s Commissioner (2021) Still not Safe - The public heath response to youth violence. Available at: [cco-still-not-safe.pdf (childrenscommissioner.gov.uk)](https://www.childrenscommissioner.gov.uk/wp-content/uploads/2021/02/cco-still-not-safe.pdf) [↑](#footnote-ref-16)
17. Northern Ireland Executive (2016) Tackling Paramilitary Activity, Criminality and Organised Crime Action Plan. Available at:

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    New Decade New Approach (2020). Available at:

    https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/856998/2020-01-08\_a\_new\_decade\_\_a\_new\_approach.pdf [↑](#footnote-ref-17)
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    <https://www.health-ni.gov.uk/publications/co-operating-safeguard-children-and-young-people-northern-ireland> [↑](#footnote-ref-18)
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    DoH (2017) Co-operating to Safeguard Children and Young People in Northern Ireland; p.15. Available at:

    <https://www.health-ni.gov.uk/publications/co-operating-safeguard-children-and-young-people-northern-ireland> [↑](#footnote-ref-20)
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    <https://www.proceduresonline.com/sbni/files/working_arrang_guid.pdf> [↑](#footnote-ref-21)
22. Home Office (2021) Modern Slavery Statutory Guidance for England and Wales and Non-Statutory Guidance for Scotland and Northern Ireland, pp.73. Available at: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/993172/Modern_Slavery_Statutory_Guidance__EW__Non-Statutory_Guidance__SNI__v2.3.pdf>

    See also Department for Education (2018) Working Together to Safeguard Children

    <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf>

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27. DoJ and OCTF (2021) Modern Slavery and Human Trafficking Strategy 2021-2022. Available at:

    <https://www.justice-ni.gov.uk/sites/default/files/publications/justice/modern-slavery-strategy-27-05-v2_0.pdf> [↑](#footnote-ref-27)