



# Identifying modern slavery and human trafficking in the context of child criminal exploitation in Northern Ireland

## Research summary

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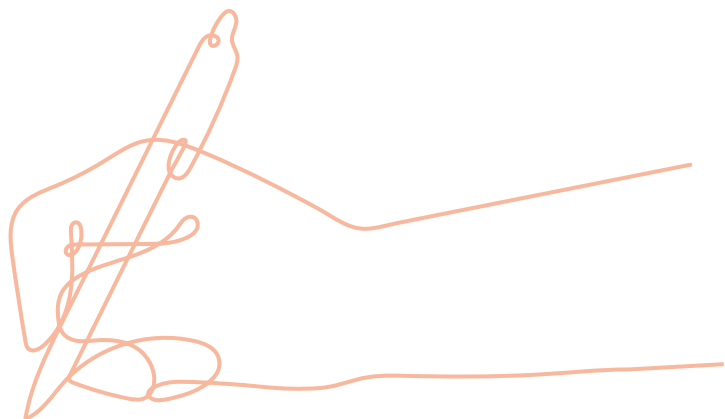
Research by:

This is a summary of the report “*Identifying modern slavery and human trafficking in the context of child criminal exploitation in Northern Ireland*”, based on research conducted by Ulster University and the International Organization for Migration (IOM). The project was co-funded by the Northern Ireland Department of Justice and the Modern Slavery and Human Rights Policy and Evidence Centre (PEC) at the University of Oxford, which in turn is funded and supported by the UK Arts and Humanities Research Council (AHRC). The full report can be accessed on the Modern Slavery PEC website at [modernslaverypec.org/resources/identifying-child-criminal-exploitation-northern-ireland](https://modernslaverypec.org/resources/identifying-child-criminal-exploitation-northern-ireland),.

The Modern Slavery and Human Rights PEC and Northern Ireland Department of Justice have actively supported the production of this Research Summary and the full report. However, the views expressed in this summary and the full report are those of the authors and persons interviewed or surveyed during the course of the research, and not necessarily of the PEC, the International Organization for Migration (IOM), the Northern Ireland Department of Justice or Ulster University.

## Note on terminology

In the UK, the term ‘modern slavery’ is used as an umbrella term that encompasses human trafficking, slavery, servitude and forced and compulsory labour. Even though human trafficking is deemed to fall within the scope of the umbrella term of modern slavery, the term ‘modern slavery and human trafficking’ or MSHT, is often used in UK policy and practice. For this reason, the study adopts this terminology, although human trafficking is deemed as one of the components of modern slavery. While in text references are used in this summary, the full reference list can be found in the main report.



## Key findings

1. Whilst there has never been a UK or Irish male child referred to the National Referral Mechanism (NRM) for exploitation in criminal activities since records began in 2014, paramilitaries and organised crime groups are known to exploit children and young people in Northern Ireland, and 79% of survey respondents – including practitioners and first responders – indicated that they have encountered child criminal exploitation (CCE) in Northern Ireland in connection with paramilitary activity.
2. The unique context of Northern Ireland poses discrete challenges to the identification of modern slavery and human trafficking in the context of child criminal exploitation. These challenges relate to: (a) the often normalised and hyperlocal nature of harm, (b) safety concerns about making NRM referrals for child criminal exploitation, and (c) Northern Ireland's unique devolution arrangements.
3. This research identifies potential barriers to the identification of child criminal exploitation as modern slavery and human trafficking in Northern Ireland within the legal and policy framework. These include: (a) the absence of a legal duty to identify and associated accountability mechanism and (b) a focus on movement within the definitions of human trafficking.
4. Despite awareness of both child criminal exploitation, and modern slavery and human trafficking amongst practitioners, child criminal exploitation is not always recognised as a form of modern slavery and human trafficking, and when it is, formal identification via the National Referral Mechanism (NRM) does not always take place. The research reveals that this may be linked to: (a) knowledge and awareness of the NRM, (b) lack of confidence in making an NRM referral (c) views on the perceived benefits and drawbacks of making referrals to the NRM.
5. Capacity building and a strategic approach is required to address many of the barriers to identifying modern slavery and human trafficking in the context of child criminal exploitation.



# Background

Since 2014, only 53 people have been referred to the National Referral Mechanism (NRM) in Northern Ireland as potential child victims of modern slavery that occurred in the UK, with only nine referrals in 2024 (UKHO, 2025).<sup>1</sup> There has also never been a UK or Irish male under 18 referred to the NRM for criminal exploitation in Northern Ireland, in comparison with 11,489 children of UK nationality identified for criminal exploitation across England, Scotland and Wales – nearly one third of all child referrals across the rest of the UK since 2014 (UKHO, 2025).<sup>2</sup>

The extraordinarily low number of potential victims of child criminal exploitation (CCE) and wider forms of modern slavery and human trafficking (MSHT) in Northern Ireland is particularly notable given the legacy of the past and continued presence of paramilitarism in Northern Ireland. There has been increasing acknowledgement of the need to understand CCE and the harms that contribute to it (Walsh, 2023; Action for Children, 2023; NICCY, 2023).<sup>3</sup> CCE has become a policy priority throughout the UK and Northern Ireland, most notably with the launch of a cross-departmental multi-agency two-year action plan to address the issue (NI DOJ, DOH, DOE, 2024). “Criminal exploitation” has been recognised within the framework of MSHT more widely in the UK for over a decade (SOCA, 2011) and Home Office guidance on county lines was updated in 2023 acknowledging that “criminal exploitation is a form of modern slavery” (UKHO, 2023). Paramilitaries and organised crime groups are known to exploit children and young people in Northern Ireland, a problem that has received attention from state and non-state actors (Walsh, 2023; Children’s Law Centre, 2025). Yet despite increasing attention, framings of such conduct as modern slavery or human trafficking have remained largely absent in Northern Ireland.

Against this backdrop, the scoping study aimed to enhance the understanding of why, given the increased focus on addressing harms experienced by children in the context of criminal exploitation, the formal identification of MSHT within the NRM is largely absent.<sup>4</sup>

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1. The National Referral Mechanism is the UK’s framework for formally identifying and referring potential victims of modern slavery and human trafficking. A full definition of the NRM is available in the Research Report Annex 1.

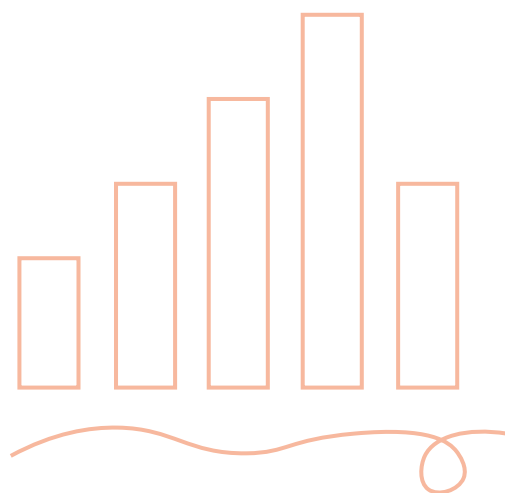
2. NRM data from the UKDS states that there has been one UK male child referred to the NRM in NI, however after investigation Statutory bodies noted that this entry was in error and indeed incorrect to include.

3. The full definition of CCE is available in the Research Report Annex 1. This definition is taken from Northern Ireland multi-agency two-year action plan to address CCE is defined. The action plan is available at: <https://www.health-ni.gov.uk/sites/default/files/publications/health/doh-cce-action-plan.pdf>

4. The terminology associated with modern slavery and human trafficking (MSHT) can be complex and contested. Annex I in the main report contains a list of key definitions for terms used within this report. Some of these definitions are also unpacked in the legal context section and the findings. In this research, we use the term modern slavery and human trafficking, since this phrasing is used by statutory actors in Northern Ireland and the UK more broadly. However, we acknowledge that modern slavery is not defined as such, but is an umbrella term that includes human trafficking itself, along with slavery, servitude, and forced labour.

# Methodology

The overarching methodological approach was a sociolegal one requiring an analysis of the law in the context within which it operates (Wheeler and Thomas, 2000). Contextually, this study assesses the law – especially positive obligations to identify trafficking in international, regional and domestic law – in the unique geographical and cultural context of Northern Ireland as a transitional society (McManus, 2016). Research methods were both qualitative and quantitative and included: (a) doctrinal legal analysis, exploring the content, scope and interpretation of key international and domestic norms, (b) 14 semi-structured interviews, with 15 anonymous key informants<sup>5</sup> based in Northern Ireland (n=11) and Great Britain (n=4), and (c) a survey completed by 43 key stakeholders based in Northern Ireland.<sup>6</sup> Interviews and surveys were analysed using NVivo and JISC software and were complemented by a desk-based review of relevant literature (academic and grey), legal and policy documents and existing data sets, namely the NRM statistics disaggregated from the UK Data Service.<sup>7</sup>



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5. 15 key informants from non-governmental organisations, statutory bodies, law enforcement agencies and the private sector. The interviews took place between December 2024 and March 2025.

6. Although 44 individuals completed the survey, one response did not have a complete set of consent questions and had to be excluded.

7. The study was approved by Ulster University's Arts Humanities and Social Sciences Faculty Research Ethics Filter Committee in October 2024.

# Findings

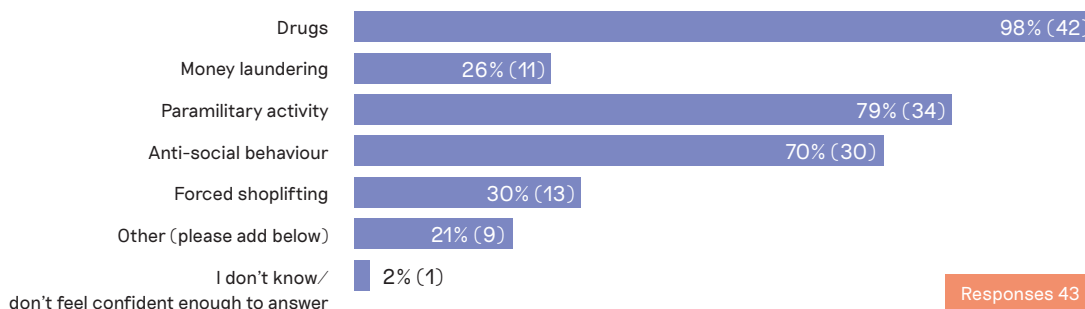
**1. Whilst there has never been a UK or Irish male child referred to the NRM as potential victim of criminal exploitation since records began in 2014, paramilitaries and organised crime groups are known to exploit children and young people in Northern Ireland, and 79% of survey respondents including practitioners and first responders – indicated that they have encountered child criminal exploitation in Northern Ireland in connection with paramilitary activity.**

Since data collection began in 2014 through to the end of 2024, 45,502 children have been referred to the NRM in the UK as potential victims of MSHT (UKHO, 2025). Of these, 15,094 (33%) were referred specifically for 'criminal' exploitation only, with the vast majority, (11,489) being UK nationals (10,762 male and 727 female). In comparison, only four of the 15,094 children have been referred as potential victims of criminal exploitation in Northern Ireland and there has never been a UK or Irish male child referred to the NRM (IOM UK, 2024).

The Northern Ireland Affairs Committee has acknowledged that both "individuals and groups will use paramilitarism as a cloak for overt criminality (such as extortion, drug dealing, threats, money laundering, sexual exploitation and other illegal activities)",<sup>8</sup> and highlighted the social capital that can be granted on individuals when they are referred to as 'paramilitaries' (NIAC, 2024, p.7). Survey respondents and interviewees provided insights into the nature of such activity and control and its links to CCE. Responding to the types of CCE which they had

## Number of respondents referencing CCE to a specific form of exploitation

If you do encounter, or have been made aware of child criminal exploitation (CCE), which form(s) of exploitation has this been in relation to? Please select all that apply.



8. This quote was included in the Northern Ireland Affairs Committee report but originated from the Independent Reporting Commission. See: (NIAC, 2024, p.7) for details.



encountered, 79% (n=34) of respondents selected 'paramilitary activity'. Indeed, even where other harms are noted, such as drugs (98% of respondents), or anti-social behaviour, this exploitation often occurs in the context of paramilitarism, or organised criminality with links to the legacy of the past.

Although it is not being identified through the NRM, CCE is being actioned through the wider child protection response in Northern Ireland. In September 2024 the Departments of Justice, Health and Education published a two-year 'Child Criminal Exploitation (CCE) action plan for Northern Ireland', and a CCE definition which contains actions to increase awareness and understanding of CCE as child abuse, prevent CCE, ensure there is effective prevention and intervention mechanisms for victims of CCE, and pursue and bring to justice those responsible (NI DOJ, DOH, DOE 2024).

In addition, children who experience CCE related harms may also be protected within the "The Cooperating to Safeguard Children and Young People in Northern Ireland" policy framework and children's needs may be assessed through the Understanding the Needs of Children in Northern Ireland (UNOCINI) Framework, which requires those working with children to holistically assess needs and enables referral into different pathways, including 'child protection', 'looked after child' and 'family support'.<sup>9</sup>

While existing legal and policy frameworks, and support structures relating to child protection in Northern Ireland are vast, the NRM is largely not being utilised which could contribute additional support mechanisms through the MSHT modern slavery and human trafficking law and policy.

**2. The unique context of Northern Ireland poses discrete challenges to the identification of modern slavery and human trafficking in the context of child criminal exploitation. These challenges relate to: (a) the often normalised and hyperlocal nature of harm, (b) safety concerns about making NRM referrals for child criminal exploitation, and (c) Northern Ireland's unique devolution arrangements.**

*"We have conditions and levels of trauma, for instance, that condition communities and individuals in a way that in post-conflict society there don't exist in other parts of the UK. It's just a reality, no matter how difficult those other parts of the UK have it." (NI-09)*

9. UNOCINI Guidance is available at: <https://www.health-ni.gov.uk/publications/understanding-needs-children-northern-ireland-unocini-guidance>

## Normalised, hyperlocal harm

It is widely acknowledged that paramilitary organisations remain active in and exert control over many communities (Sturgeon et. al., 2024). The findings reveal that the legacy of the past persists in both the intergenerational and familial links to paramilitary and organised crime groups, the level of control these groups have over local communities, and the hyperlocal and normalised nature of exploitation that occurs as a result of these contexts. Several interviewees spoke of participation in such groups as almost a 'rite of passage'.

*"I don't know if this is Northern Ireland centric that because of the familial links, a lot of them don't think they're being exploited". (NI-05)*

In this sense, harm is often normalised in Northern Ireland to the extent that children, parents and those working in their communities may not always recognise exploitation that is occurring as CCE. Further, paramilitary groups are sometimes trusted as those protecting communities (see Walsh, 2023).

## Unique safety concerns

Even where exploitation is recognised, there are concerns about formally identifying such harm through the NRM.

One participant with experience working in both Great Britain and Northern Ireland remarked that,

*"The young people here [in Northern Ireland] don't want to talk. They're terrified. The young people [in England] would tell you anything. They don't have the same fear." (NI-07)*

Concerns relate to the safety of children themselves, but also the safety of those referring, particularly in youth and community settings. Interviewees raised concerns that children might be perceived as 'touts' or be at risk of further harm such as paramilitary style punishment attacks if NRM referrals were made.

Some, including those with experience of the justice system in Northern Ireland, expressed concerns about how the statutory defence in the Northern Ireland would work in practice, if a young person felt too fearful to admit the harm they encountered due to potential repercussions. This is not a challenge that is unique to Northern Ireland, however, contextual challenges remain, given the control exerted over communities by paramilitaries and organised criminal groups (OCGs).



Concerns were raised about the adequacy of relocation support given the reach of paramilitaries and OCGs exerting significant control over communities. Furthermore, there are additional risks associated with making poor-quality NRM referrals that may be rejected at the Reasonable Grounds (RG) or Conclusive Grounds (CG) stage, since a child could be placed in an even more vulnerable situation, potentially labelled as a 'tout', but left without any of the protections the NRM provides, and at risk of reprisal.

### Institutional fragmentation

Alongside community contexts that are still very much impacted by the legacy of the past, Northern Ireland's system of government is also distinct. The mandatory coalition means that government ministers from a range of different parties must work together on cross-departmental challenges such as child criminal exploitation. At various points since 1998, institutions have collapsed, most recently from 2016–2020 and 2021–2024.<sup>10</sup> These challenges are, of course, not unique to CCE or MSHT policy settings, but can certainly impact upon such a complex issue, that requires a coordinated, strategic and long-term approach. Even where progress is desired, the 'stop-start' nature of devolved government in Northern Ireland creates unique challenges. Progress on addressing CCE as MSHT, and ensuring effective identification requires cross-departmental buy-in. In Northern Ireland, this means reaching agreement across the political spectrum, which can add an additional challenge to efforts to improve identification.

**3. This research identifies potential barriers to the identification of child criminal exploitation as modern slavery in Northern Ireland within the legal and policy framework. These identified by this research include (a) the absence of legal duty to identify and associated accountability mechanism and (b) a focus on movement within definitions of human trafficking.**

The term 'modern slavery' is not defined in international law. In the UK, it is used as an 'umbrella' term to include human trafficking, slavery, servitude, and forced labour, all of which are defined in international law. As such, if conduct falls within the scope of any of these definitions, in the UK it will be considered as a form of modern slavery. The research identified that human trafficking may be the most appropriate offence to cover much of what is described as CCE in Northern Ireland.

Regarding the identification of MSHT, the UK has a duty to identify human trafficking under Article 10 of the Council of Europe Convention on Action against

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10. More recently, the Northern Ireland Assembly (Stormont) and Northern Ireland Executive collapsed in 2017 and re-formed in 2020 with the New Decade New Approach Agreement; then in 2022, the institutions collapsed again, only to be restored in January 2024 with the Safeguarding the Union Agreement.

Trafficking in Human Beings (ECAT), and compliance with positive obligations under Article 4 of the European Convention on Human Rights (ECHR) requires identification. However, the Northern Ireland legislation's 'Duty to Notify' provision is not yet in force. In contrast, in England and Wales, Section 52 of the Modern Slavery Act places a statutory duty on certain authorities to notify the Home Office when 'potential victims of modern slavery' are encountered.<sup>11</sup> While the NRM is not explicitly mentioned, guidance notes that this duty is deemed satisfied where an NRM referral occurs (MSA Statutory Guidance, para 4.3). In the case of children, an NRM can occur without consent and as such, the duty will always be met when a child is referred to the NRM. For adults, where an NRM is not made, a Duty to Notify (or DtN) form must be filled in by those authorities who are deemed by statute to have the duty. While referral to the NRM is said to be mandatory for children in Northern Ireland, there are no legal consequences within Northern Irish law or NRM Guidance, for failure to make a referral or requirements to otherwise notify the Home Office regarding potentially trafficked children.

A further potential barrier to identifying *human trafficking* in particular, lies in how it is defined in both legislation and NRM guidance. With the adoption of the Palermo Protocol<sup>12</sup> in 2000, States agreed the first internationally accepted definition of human trafficking. The definition is set out in Article 3(a) of the Protocol and contains three elements which are detailed below. Notably, in the case of children, only the 'act' and 'purpose' elements need to be established for conduct to amount to trafficking. The elements are as follows:

- **Act:** "recruitment, transportation, transfer, harbouring, or receipt"
- **Means:** "the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person"
- **Purpose:** "exploitation".<sup>13</sup>

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11. These entities are set out in S52(5) of the Modern Slavery Act 2015 and includes local authorities, and police officials, among others.

12. Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime. 2000. [Online] 55 UNTS 383, opened for signature 15 November 2000, entered into force 25 December 2003 Available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons>

13. Article 3(a) defines human trafficking as "the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs; (b) The consent of a victim of trafficking in persons to the intended exploitation set forth in subparagraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used; (c) The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered "trafficking in persons" even if this does not involve any of the means set forth in subparagraph (a) of this article; (d) "Child" shall mean any person under eighteen years of age."

Section 2 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 defines human trafficking identically to Section 2 of the Modern Slavery Act 2015, as follows:

“(1) A person (“A”) commits an offence if A arranges or facilitates the travel of another person (“B”) with a view to B being exploited”. Section 2(4) clarifies that “Travel” means— (a) arriving in, or entering, any country, (b) departing from any country, or (c) travelling within any country.” While statutory guidance references the Palermo definition, it continues to refer to travel. This is also the case within NRM Guidance, which defines the action as “recruitment, transportation, transfer, harbouring or receipt, **which includes an element of movement.**”<sup>14</sup>

This conception of human trafficking narrows the international definition, and, while some CCE related harm may be captured within other forms of modern slavery such as forced labour, this may not always be the case. Further, a focus on movement within law and NRM guidance may be both a cause and consequence of how human trafficking (and, by association, modern slavery) is conceptualised and understood within and beyond Northern Ireland. Indeed, survey data reveals movement narratives within some understandings of *both* modern slavery and human trafficking among first responders, statutory service providers, and NGO staff alike. When asked, “[i]n your words, how would you describe ‘human trafficking’ and ‘modern slavery’?”, Survey responses often linked ‘human trafficking’ and ‘modern slavery’ referring to movement.

*“Child exploitation has become more normal and it’s being used more. I do think there is a challenge in using human trafficking because I think you’d need to do some work around about helping people understand that... because of the sort of media focus on what is trafficking, you know, boats of migrants, you know, invading the white Cliffs of Dover.” (NI-09)*

The hyperlocal and familial nature of CCE in Northern Ireland may shed light on the barrier of the ‘movement’ narrative embedded in the legislative and policy framework on trafficking in a way that may not be as apparent in other settings.

14. The Guidance is Statutory Guidance for England and Wales and Non-Statutory Guidance for Northern Ireland.

**4. Despite awareness of both child criminal exploitation and modern slavery and human trafficking amongst practitioners, child criminal exploitation is not always recognised as a form of modern slavery and human trafficking, and when it is, formal identification via the National Referral Mechanism does not always take place. The research findings have shown that it may be linked to: (a) knowledge and awareness of the National Referral Mechanism, (b) lack of confidence in making an National Referral Mechanism referral (c) views on the perceived benefits and drawbacks of making referrals to the National Referral Mechanism.**

A general good awareness of CCE was observed among survey participants in Northern Ireland and interview data indicates an awareness of CCE as a phenomenon that has occurred for decades in Northern Ireland without formal recognition.

Yet, despite a general understanding of MSHT among participants, data analysis reveals misconceptions among both survey respondents and interviewees, particularly in relation to a perceived need for movement, the involvement of foreign nationals and mainly of women. This may indicate that children experiencing CCE in their local community, or even within the home, may not be readily identified as having experienced MSHT.

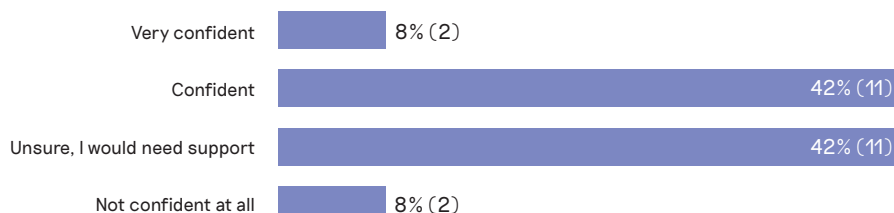
Among survey respondents and interviewees, there was a range of knowledge and understanding of the NRM. While 51% of survey respondents are 'very aware' of the NRM, 35% have 'heard of it' and 14% 'do not know about it'. Among First Responders, 58% report being 'very aware', whilst only 36% of law enforcement are 'very aware' of the NRM.<sup>15</sup> Although respondents generally encounter CCE through their line of work, of all first responders, 50% would not feel confident or would need support to make an NRM referral. When asked whether the NRM is a useful mechanism for supporting victims of CCE, only 19% of all respondents stated 'definitely', 23% stated 'maybe', and over 50% were unsure or disagreed.

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15. A first responder organisation is an authority that is authorised by the Home Office to refer a potential victim of modern slavery and human trafficking into the National Referral Mechanism.

### Number of first respondents and confidence in making an NRM referral

If you work for a First Responder organisation: How confident would you feel about making a National Referral Mechanism (NRM) referral?

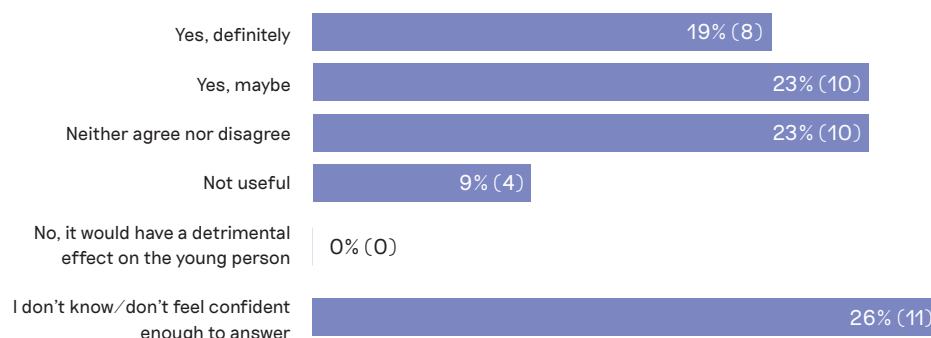


Responses 26

(While 27 responses were received for this question, one response was excluded due to an error in the question in the online survey form at the time the survey was taken.)

### Number of respondents stating the NRM as a useful mechanism for support potential and actual victims of CCE

Do you think the National Referral Mechanism (NRM) is a useful mechanism for support potential and actual victims of child criminal exploitation (CCE)?



Responses 43

A key theme, reflected in many responses was, that the NRM would not bring an added benefit for those in Northern Ireland referred for CCE. Several respondents referenced the existing support from social services without need for an NRM referral, the NRM as a 'tick box' exercise or an awareness that the NRM was mainly suited to support "*certain legal immigration processes whereby an NRM referral or a recognition that they're a victim can help maybe humanitarian protection stuff*" (NI-04).

As noted above, other respondents felt that use of the NRM could potentially be harmful to a young person, particularly how it functions in a post-conflict society, given the familial links with CCE in Northern Ireland and the threat of repercussion, "*if the community sees them as somebody who has snitched*" (NI-02).

The perception of the NRM's function and benefits are compounded by a lack of confidence in the process. One respondent noted: *"I never would have thought about NRM and we have plenty of young people who are being exploited by paramilitary organizations. And it's the lack of, I think confidence"* (NI-08). Several referred to minimal or inadequate training as an issue: *"the only NRM training there comes from the Home Office themselves in terms of what their thresholding is. So yeah, I think I empathise a lot with other organisations in having the confidence to put those in"* (NI-08), or no training at all: *"I would say probably the NRM is just such a process now that even newly qualified staff that maybe haven't had training or anything on it are probably opening up the form, filling it out and submitting"* (NI-11).

Regarding the perceived benefits, some respondents mentioned how NRM data could provide a wider picture of CCE in Northern Ireland, acknowledging trends in identification, methods of harm, types and location of exploitation, allowing for a more targeted response, effective resourcing and impactful support and safeguarding.

An additional perceived benefit of the NRM identified by some relates to the 'power' in recognising and understanding a young person as a victim, rather than a perpetrator: *"the benefit for me is if we understand victimhood... referring people who've been forced into crime into an NRM and we make it the norm that they are treated as victims rather than perpetrators. Then we can make it a community norm, and then we can start to change the community and how the society looks at these young people"* (NI-02).

Victim recognition also has a role to play in youth justice and diversion from prosecution as the use of the NRM and supporting the use of statutory defence was noted as an objective benefit to a young person being criminally exploited, *"if we can just utilise that NRM as a defence in court I think it's worth it. It's worth its weight in gold if we can do that"* (NI-02). Despite recognition of the statutory defence as a significant benefit that is utilised across Great Britain, participants felt that this provision is unused and unknown among legal practitioners in Northern Ireland.

When it comes to addressing gaps in knowledge and understanding of CCE, its relationship with MSHT, and the role of the NRM, promising practice from elsewhere offers insights for Northern Ireland. Respondents familiar with the devolved NRM pilot in Scotland indicated that implementation positively impacted knowledge and awareness of CCE in relation to MSHT among colleagues through embedding the NRM in child protection processes, as well as reduced waiting times.



## **5. Capacity building and a strategic approach is required to address many of the barriers to identifying modern slavery and human trafficking in the context of child criminal exploitation.**

The research was undertaken at a time of significant flux in terms of the response to CCE in law, policy and practice. In the context of this moving picture, there is real a sense of the opportunity that exists for Northern Ireland to make significant meaningful progress in addressing CCE, in particular, within the MSHT framework. Interview participants pointed to this opportunity, and some spoke of the promise within upcoming changes likely to occur as part of the moving picture:

*“We have an opportunity to build something better than the rest of the UK has. We are creating this safeguarding mechanism, whatever it looks like, so we’re creating this thing. We have an opportunity to do one that’s more, that’s... very specific for here, but also better... And why wouldn’t we grab that between both hands?” (NI-02)*

Interview participants recognised awareness raising and training as important to enhance understanding, change the narrative around CCE and MSHT, and build confidence in engaging with the NRM procedure. Training is included as a priority in the cross departmental CCE action plan and in the Northern Ireland ‘Modern Slavery and Human Trafficking Strategy’. Alignment of both could improve confidence, build capacity of stakeholders and ensure that the NRM is used appropriately:

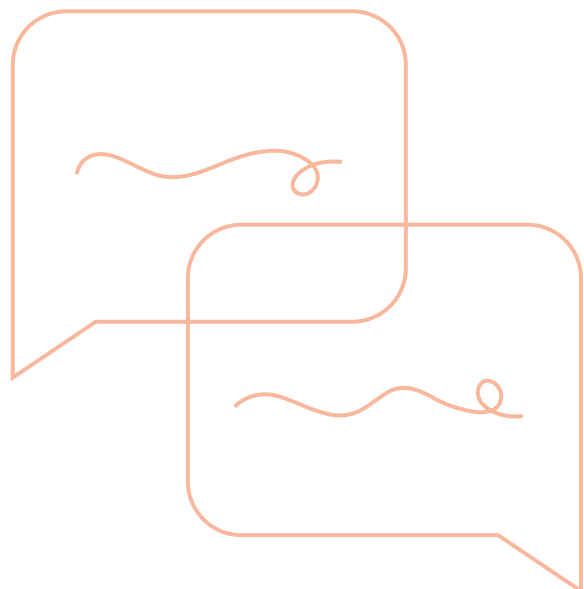
*“[i]f you’re going to get everybody in Northern Ireland to start submitting NRMs, you’d need that training around what is a good NRM referral and what it looks like because otherwise the system will fail immediately.” (NI-12)*

Interviewees also highlighted the need for specialist knowledge and understanding of the referral process:

*“Dealing with child criminal exploitation is a specialised practice, it’s not youth work. It’s an element of youth work yes... you know we can’t rely on, you know, youth clubs to do this. There should be individuals within those spaces who specialise in it... and it should be a part of their role within the organisation.” (NI-07)*

Similarly, one interviewee spoke of the concept of an ‘MSHT Champion’ which was previously introduced in some settings in England, to have expert focal points trained within local authorities, police and social services to streamline resources. This aligns with the approach in some Local Council areas in England where Modern Slavery Coordinator roles have been established (Human Trafficking Foundation, 2025).

To maximise capacity, particularly in a context where resources are limited, a strategic and efficient allocation of resources could provide significant cost savings and value for money. As such, it is essential to establish clarity on ownership of addressing child criminal exploitation **as** modern slavery and human trafficking, while ensuring the work remains collaborative across organisations and government departments.



# Recommendations

## For the UK Government

**Explore in consultation with key stakeholders, what regional modifications to the NRM may be required for it to function effectively in the context of each devolved region.** Northern Ireland's unique post-conflict context has led to normalised and often hyperlocalised harm, and there are additional safeguarding concerns, including fear of reprisals, to be considered for the NRM processes.

**The UK Home Office should consider resourcing an in-depth training and awareness raising programme, combining cross-cutting issues of modern slavery and human trafficking; and child criminal exploitation for first responders, and those who are likely to encounter child criminal exploitation across Northern Ireland. This training should be designed and delivered by local stakeholders and include separate modules on (a) National Referral Mechanisms processes, safeguards and benefits, and (b) understanding and identifying child criminal exploitation.** Key stakeholders in Northern Ireland often lack the knowledge and awareness needed to be able to effectively refer children to the NRM, yet evidence from elsewhere, such as Scotland, shows the impact of specialist training in local settings.

## For the Northern Ireland Government and Assembly

**Consider (a) amending Section 2 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 to remove the requirement for travel and instead align with the Scottish legislation (i.e. 'takes a relevant action') (b) progressing plans (MSHT Strategy 1.1) to introduce the Duty to Notify (DtN) and Slavery and Trafficking Risk Orders (STROs) in Northern Ireland, (c) introducing an accountability mechanism to ensure referral of children, accompanied by an associated training for organisations to enhance understanding on how their duty is discharged.** The international legal definition of human trafficking includes, but does not require movement, and the UK has obligations under international law to identify conduct that falls within the scope of the international definition. Child criminal exploitation in Northern Ireland may not involve significant or any movement.

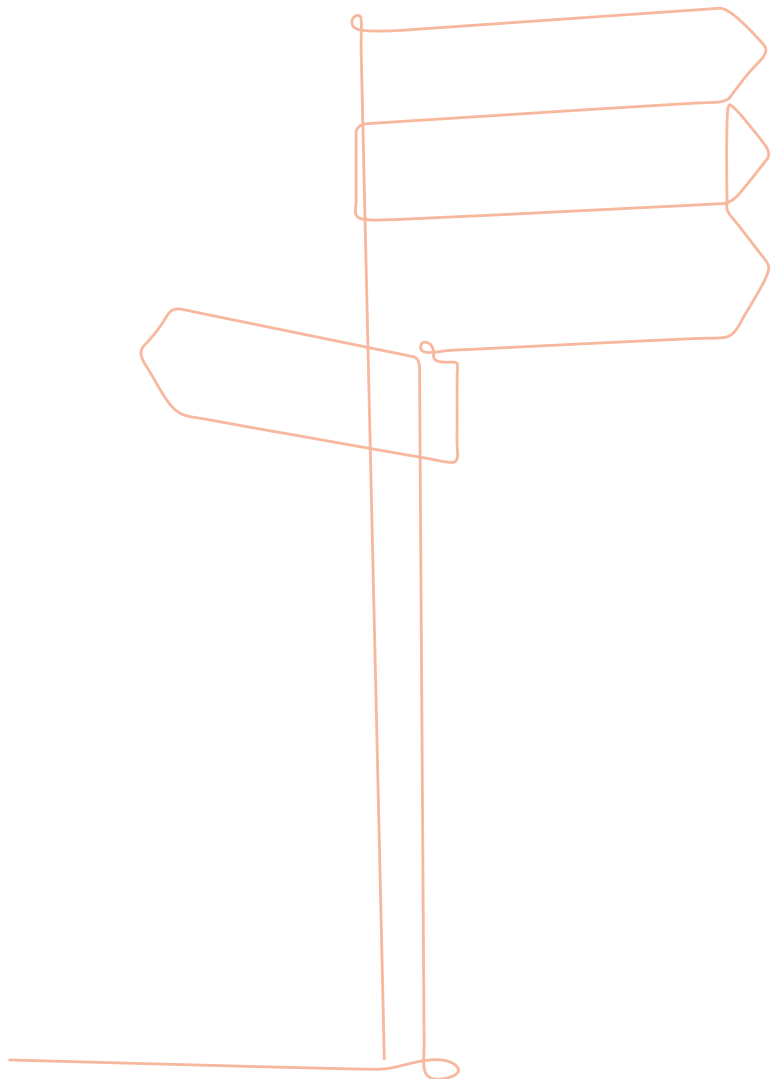
**The Department of Justice should consider, in partnership with the Departments of Health and Education, developing a modern slavery and human trafficking and NRM Toolkit, with expert and lived experience input, to be incorporated into the planned Child Criminal Exploitation Toolkit laid out in the Child Criminal Exploitation Action Plan. Additional research should also be considered to incorporate lived-experience, contributing to development of the toolkit.** High quality National Referral Mechanisms referrals require specialist knowledge of key legal and policy frameworks and associated processes. Such training can further equip and empower first responders to effectively make child criminal exploitation referrals to the National Referral Mechanism.

**To develop specialist expertise, awareness and capacity for response, the Northern Ireland Departments of Justice, Health and Education should consider investing in Child Criminal Exploitation/Modern Slavery and Human Trafficking champions within regions, bodies and sectors, who are equipped to act as subject focal points for their respective organisation.** Addressing child criminal exploitation in the context of modern slavery and human trafficking requires specialist knowledge and insight. Elsewhere, investing resourcing into key modern slavery and human trafficking champions has proved to be a useful and strategic approach to develop subject specialists who can act as points of contact.



## Further research

Further research is required to explore the findings of this scoping study in greater depth. This could include: engaging with additional stakeholders, including children and young people with lived experience of child criminal exploitation, as well as their parents. Additional research may also include further exploration of the impact of understandings of modern slavery and human trafficking as linked to movement. Finally, if the above recommendations are implemented, further research may measure the impact of these actions on identifying modern slavery and human trafficking in the context of child criminal exploitation.



# MODERN SLAVERY & HUMAN RIGHTS

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The Modern Slavery and Human Rights Policy and Evidence Centre (PEC) at the University of Oxford exists to enhance understanding of modern slavery and transform the effectiveness of laws and policies designed to address it. The Centre funds and co-produces high quality research with a focus on policy impact, and brings together academics, policymakers, businesses, civil society and survivors to collaborate on solving this global challenge.

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