

NIACRO response to 'Leaving Prostitution: a strategy for help and support'

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Dear Mr Gregg

Thank you for the opportunity to respond to the consultation on 'Leaving Prostitution: a strategy for help and support'.

NIACRO is a voluntary organisation which has been working for more than 40 years to reduce crime and its impact on people and communities. NIACRO provides services for, and works with, children and young people, adults and families, whilst working to influence others and apply our resources effectively. We receive funding from, and work in partnership with, a range of statutory departments and agencies in Northern Ireland, including criminal justice, health, social services, housing and others. Our policy comments are based on our direct experience of delivering services and gathering feedback from those in or impacted by the criminal justice system.

We welcome the recognition of the need for this strategy and the Department's exploration of how best to support people to leave prostitution. We recommend that this strategy is reviewed regularly, and that a strategic direction may be developed from the learnings of implementing this initial strategy.

Some specific comments on points within the strategy are outlined below:

• The strategy states at **5.6** that:

"criminalisation, through prostitution and non-prostitution related offences, is a significant barrier in terms of both seeking help and exiting prostitution. It acts as a barrier to finding employment, disrupts their lives and families, and may create additional financial burdens and debt, as crimes involving prostitution are often dealt with by imposing fines."

We welcome the recognition of fear of criminalisation as a barrier. We recommend the strategy highlights how voluntary and community sector organisations, such as NIACRO, can support those affected by the criminal justice system to improve their employability and access sustainable education, training and employment places, appropriately disclose convictions, develop and maintain supportive relationships with their family, and manage their money more effectively. Further, we recommend the DHSSPS engages proactively with DEL in its current development of the new Further Education Strategy to identify how colleges could best support those leaving prostitution to overcome barriers to education, training and employment.



- Section 6.12 references the Inspire Women's Project and NIACRO's involvement in this initiative. While there may be value in looking at Inspire as an effective model of support, we are concerned that the current wording of this paragraph could be misleading as there are no specific programmes in Inspire that address the underlying issues surrounding prostitution. Though there are prison arts courses and creative writing courses, women are signposted to community organisations to meet their additional needs.
- Sections 6.13 and 6.14 note the vocational training and support offered by Extern Works in Mallusk. Again this could be misleading, as there are few – if any – training opportunities for women within this programmes at this sites. A further factor to consider is the presence of the other attendees, which may make it unsuitable for both males and females accessing this support.
- While we acknowledge the importance of counselling to support or improve mental health issues, referenced in section 6.23, it is essential to recognise that a lot of groundwork may need to be down with these potential service users before they feel able to access mainstream or community services. This may be due to a number of issues, perhaps including feelings of shame, guilt, fear or stigma. We recommend that a floating support or outreach service such as the kind currently delivered by NIACRO's Assisting People and Communities programme (APAC) could provide that important first step in preparing for further support.
- In relation to the Programme of Assistance and Support (PAS) outlined in section 7, we welcome that PAS is not dependent on that person's involvement in any criminal proceedings, is delivered on a voluntary basis and takes account of their needs regarding safety and protection from harm. However, we are concerned how PAS will be used with Social Services, particularly in relation to looked after children.
- We also believe that PAS should be available to all those who want to leave prostitution and are not involved with statutory services. Those who are not actively seeking an exit should know how to access support if and when they need it. We recommend that a multi-lingual and multi-platform outreach programme, utilising advertising and education and the existing support structures in the voluntary and community sector, should be developed to communicate the existence of PAS to a wide audience, including but not limited to students, local communities, stay-at-home mothers, and migrants/refugees.

In general, we welcome the strategy as a starting point but recommend it is monitored, reviewed and improved based on learnings. As outlined above, it is critical that public engagement is factored in to any strategy so that those who wish to access the support know how they can do so. While this is a challenging financial climate, it is important that those who need this service can access it and that the growing pressure on many of the services referenced, which support a wide range of marginalised people, is taken into consideration when identifying any potential existing support structures.

Yours sincerely,

Olwen Lyner Chief Executive NIACRO