Room 242
Parliament Buildings
Ballymiscaw
Stormont
Belfast
BT4 3XX

7th November 2013

Dear Ms Darrah

Re: Human Trafficking and Exploitation (Further Provisions and Support for Victims) Bill

Thank you for your email in connection with the Bill and we are grateful for the extension of the deadline to facilitate our submission. The Superintendents' Association of Northern Ireland represents the Superintending ranks – the senior operational leaders – within the Police Service of Northern Ireland.

This Association welcomes appropriate measures that would go towards addressing the blight that human trafficking and exploitation represent. We do, however, have a number of concerns with the Bill in its current form.

Clause 6 sets out what can be regarded as a noble aim, but the enforcement thereof would present particular operational and evidential difficulties. As currently drafted, the clause would include prostitution; however, the sexual exploitation of trafficked persons is distinct from prostitution where the vendor may willingly engage in the various activities for a variety of reasons.

From a policing perspective, **Clause 7** seems, on the face of it, unnecessary. Section 32 of the Police (Northern Ireland) Act 2000 adequately sets out the investigative responsibilities of the police. The mention of 'effective investigative tools' is ill-defined, and the clause seems to suggest the potential for or existence of a multi-tiered approach to such investigations.

It is this Associations' view that the establishing of a Northern Ireland Rapporteur (**Clause 16**) does not represent an efficient use of public funds. With the existence of the Northern Ireland Policing Board, Criminal Justice Inspection Northern Ireland and various Assembly Departmental Committees, there are sufficient oversight bodies and accountability mechanisms currently available.

Yours sincerely,

J A Kearney
Superintendent
Honorary Secretary