

**Human Trafficking and Modern Slavery Strategy 2016/17**

**Summary**

**The Northern Ireland Human Rights Commission (‘the Commission’):**

* **whilst welcoming the Strategy, advises that, in order to embed a human rights-based approach in the Strategy, the Department commits itself within the Strategy to taking action consistent with international human rights standards, particularly those protecting the principles of non-refoulement and extraterritoriality (para. 2.7);**
* **advises that the Strategy would be strengthened by the inclusion of concrete and measurable outcomes. This should be accompanied by additional proposals for how such outcomes are to be time-bound and effectively monitored and evaluated (para. 3.4);**
* **recommends that the Strategy commit the Department of Justice to effective liaison with the Department of Health to address the sexual health of victims of human trafficking (para. 4.6);**
* **advises the Department to remove any conditions attached to the provision of support services, including the requirement of assisting in criminal justice proceedings. The Commission advises that the focus on vulnerable groups, particularly women and children, in international human rights instruments should be reflected in the Strategy by outlining more specific actions aimed at female and child victims of human trafficking (para. 4.7);**
* **advises that the Independent Guardian Regulations for children be promptly enacted. The Strategy should more accurately reflect the steps required to meet this objective and further detail the measures required to effectively implement the Regulations (para. 4.8);**
* **recommends that the Strategy should detail how Health and Social Care Trusts will safeguard and protect the interests of children who have gone missing whilst in the care of the Trust and who are at risk of being trafficked (para. 4.9);**
* **recommends that the Strategy be linked to cross-departmental efforts aimed at reducing poverty among “at risk” groups. The Department should be cognisant of the need for outcomes going beyond increased public awareness and be proactive in tackling the underlying causes of demand to prevent instances of trafficking in human beings (para. 5.4);**
* **recommends that the Strategy provide further detail on the steps to be taken to continuously learn from ongoing cases so as to better inform policy and practice (para. 5.5);**
* **advises that, in order to ensure the effective investigation and prosecution of human trafficking offences, the Department should outline the steps it will take to ensure the effective extraterritorial application of international human rights standards in cases of cross-border human trafficking (para. 5.6);**
* **recommends that the Strategy specify the measures to be taken to fulfil the Department’s duties under the Human Rights Act where public services are contracted out (para. 6.5);**
* **recommends that the Strategy should further detail the measures to be taken by the Department to engage with and ensure businesses fulfil their human rights responsibilities in accordance with international standards and the Modern Slavery Act (para. 6.6).**

**1. Introduction**

1.1 The Northern Ireland Human Rights Commission (the Commission) pursuant to section 69(1) of the Northern Ireland Act 1998, reviews the adequacy and effectiveness of law and practice relating to the protection of human rights.[[1]](#footnote-1)In accordance with this function the following statutory advice is submitted to the Department of Justice in response to the consultation on a human trafficking and modern slavery strategy.[[2]](#footnote-2)

1.2 The Commission bases its advice on the full range of internationally accepted human rights standards, including the European Convention on Human Rights as incorporated by the Human Rights Act 1998 and the treaty obligations of the Council of Europe (CoE) and United Nations (UN) systems.[[3]](#footnote-3) The relevant international treaties in this context include:

* International Covenant on Civil and Political Rights (ICCPR);[[4]](#footnote-4)
* International Covenant on Economic, Social and Cultural Rights (ICESCR);[[5]](#footnote-5)
* Convention on the Elimination of Discrimination Against Women (CEDAW);[[6]](#footnote-6)
* Convention on the Rights of the Child (CRC);[[7]](#footnote-7)
* United Nations Convention relating to the Status of Refugees (Refugee Convention);[[8]](#footnote-8)
* Convention against Transnational Organised Crime;[[9]](#footnote-9)
* Protocol to Prevent, Supress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organised Crime (UN Trafficking Protocol);[[10]](#footnote-10)
* Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography (CRC Optional Protocol on Child Prostitution).[[11]](#footnote-11)

1.3 In addition to these internationally-binding treaties, there exists a body of ‘soft law’ developed by the human rights bodies of the United Nations and Council of Europe. These declarations and principles are non-binding but provide further guidance on specific areas. The relevant standards in this context include:

* Universal Declaration on Human Rights (UDHR);
* UN Convention for the Suppression of the Traffic in Persons and of Exploitation of the Prostitution of Others;
* UN Office on Drugs and Crime Model Law against Trafficking in Persons (UN Model Law);
* UN Guiding Principles on Business and Human Rights (Ruggie Principles);
* UN Guiding Principles Reporting Framework (UN Reporting Framework);
* Office of the High Commissioner for Human Rights Recommended Principles and Guidelines on Human Rights and Human Trafficking (OHCHR Recommended Principles);
* CoE Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (CoE Sexual Exploitation Convention);[[12]](#footnote-12)

1.4 Relevant regional instruments and declarations include:

* CoE Recommendation R(91)11 concerning sexual exploitation, pornography and prostitution of, and trafficking in, children and young adults;
* CoE Recommendation 1325 (1997) on traffic in women and forced prostitution;
* CoE Recommendation R(2000)11 concerning action against trafficking in human beings for the purposes of sexual exploitation;
* CoE Recommendation Rec(2001)16 on the protection of children against sexual exploitation;
* CoE Recommendation Rec(2002)5 on the protection of women against violence;
* CoE Recommendation 1545 (2002) on the campaign against trafficking in women;
* CoE Recommendation 1610 (2003) on migration connected with trafficking in women and prostitution;
* CoE Recommendation 1663 (2004) on domestic slavery: servitude, au pairs and mail-order brides;
* CoE Convention on Action against Trafficking in Human Beings (CoE Trafficking Convention);[[13]](#footnote-13)
* European Union Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims (EU Trafficking Directive).

1.5 The Northern Ireland Executive (NI Executive) is subject to the obligations contained within these international treaties by virtue of the United Kingdom (UK) Government’s ratification and the provisions of the Northern Ireland Act 1998.[[14]](#footnote-14)

**General Observations**

2.1 The Commission broadly welcomes the proposals contained in the draft Human Trafficking and Modern Slavery Strategy 2016/17 (the Strategy). In particular, the provision of training to relevant officials coming into contact with victims of trafficking in human beings and the heightened degree of cooperation, especially cross-border, are necessary elements in the prevention of human trafficking. The Commission further welcomes the proposed additional support services for victims such as the Modern Slavery Hotline. However, the Commission notes that the Strategy does not refer to the relevant international human rights standards dealing with human trafficking and modern slavery.[[15]](#footnote-15)

2.2 The right to freedom from slavery, human trafficking and other forms of labour or sexual exploitation is protected in ICCPR, Article 8 and UN Trafficking Protocol, Article 5. States may not extradite or deport victims of human trafficking where there is a risk of irreparable harm occurring.[[16]](#footnote-16) This is in accordance with the principle of non-refoulement contained in the Refugee Convention, Article 33 prohibiting the return of a refugee to their country of origin where they risk persecution on grounds of, inter alia, race or religion.[[17]](#footnote-17) Moreover, under the principle of extraterritoriality,

[i]f a State party takes a decision relating to a person within its jurisdiction, and the necessary and foreseeable consequence is that that person’s rights under the [ICCPR] will be violated in another jurisdiction, the State party itself may be in violation of the [ICCPR].[[18]](#footnote-18)

The extraterritorial application of international treaties falls within the purview of the UK Government. Nonetheless, in order to meet the requirements of the treaty, it is incumbent on the Foreign and Commonwealth Office, PSNI and National Crime Agency to cooperate with the Department of Justice in order to protect the rights of those under the jurisdiction of the state party.

2.3 State obligations in relation to human trafficking are found in the UN Trafficking Protocol and mandate the criminalisation of trafficking in person offences, special protections for victims during criminal proceedings, support services for the recovery of victims and the potential to obtain compensation for damages.[[19]](#footnote-19) Under UN Trafficking Protocol, Article 10, states are also required to provide training to law enforcement and other relevant officials in contact with potential victims of human trafficking to increase identification of potential instances of trafficking in human beings.

2.4 International standards exist in relation to women and children given their particular vulnerability to trafficking. CEDAW, Article 6 requires states parties to take measures to supress trafficking, exploitation and prostitution of women and the Committee on the Elimination of Discrimination against Women (CEDAW Committee) has made specific comments on the need to adopt a gender-sensitive approach to properly identifying victims of human trafficking among women asylum seekers and access to asylum procedures without discrimination.[[20]](#footnote-20) Similar obligations are placed upon states in the context of combating human trafficking and sexual exploitation of children.[[21]](#footnote-21) The CoE Sexual Exploitation Convention mandates greater awareness-raising among professionals in contact with children and reiterates the requirement to act in the best interests of the child in decision-making processes.[[22]](#footnote-22)

2.5 Finally, the CoE Trafficking Convention requires states parties to

[p]romote a human rights-based approach and use gender-mainstreaming and a child-sensitive approach in the development, implementation and assessment of all policies and programmes.[[23]](#footnote-23)

2.6 The UN Trafficking Protocol emphasises that training provided to officials coming into contact with victims of human trafficking “should also take into account the need to consider human rights and child- and gender-sensitive issues”.[[24]](#footnote-24) Given that human rights violations are both a cause and a consequence of human trafficking, any government strategy should place human rights at the centre of its approach to combating trafficking in human beings.[[25]](#footnote-25)

**2.7 Whilst welcoming the Strategy, the Commission advises that, in order to embed a human rights-based approach in the Strategy, the Department commits itself within the Strategy to taking action consistent with international human rights standards, particularly those protecting the principles of non-refoulement and extraterritoriality.**

**Strategy**

3.1 The Strategy aligns its four strategic priorities with those set by the UK Anti-Slavery Commissioner.[[26]](#footnote-26) The UN Office of the High Commissioner for Human Rights has noted that SMART actions must be specific, measurable, attainable, realistic and time-bound as well as being subject to regular evaluation.[[27]](#footnote-27)

3.2 The Commission notes that the projected outcomes within the Strategy such as “risk to public reduced”, “increased potential for prosecutions” and “informed, effective policies” could be more tightly defined.[[28]](#footnote-28) Moreover, the Strategy does not provide detail on the ways in which such outcomes are to be measured or evaluated, particularly those concerning “improved outcomes for victims” and “improved victim confidence in the justice system”.[[29]](#footnote-29)

3.3 The Commission notes that whilst actions are time-bound, these are deadlines for completion which neither set out the stages of development within the actions nor their associated timeframes. Moreover, given the OHCHR’s requirement that any activities be effectively monitored and evaluated, the Strategy fails to provide any mechanism for this to take place.[[30]](#footnote-30)

**3.4 The Commission advises that the Strategy would be strengthened by the inclusion of concrete and measurable outcomes. This should be accompanied by additional proposals for how such outcomes are to be time-bound and effectively monitored and evaluated.**

**Strategic Priority 2: Protect and Support**

4.1 Under section 12 of the Human Trafficking and Exploitation Act 2015, the parameters of the Strategy should extend to all offences contained in section 1 and 2 which includes, inter alia, sexual exploitation and securing services by force, threats or deception.[[31]](#footnote-31) The Strategy sets out to provide “improved identification of victims and the provision of effective protection and support” through a range of actions.[[32]](#footnote-32) The Strategy does not, however, deal with specific actions aimed to reduce sexual exploitation as required under the 2015 Act or on gender-focused actions as recommended by the CEDAW Committee.

4.2 The CEDAW Committee has recommended that “states parties ensure… the right to sexual health information, education and services for all women and girls including those who have been trafficked”.[[33]](#footnote-33) This obligation derives from the right of everyone to the enjoyment of the highest attainable standard of physical and mental health provided in ICESCR, Article 12. Such obligations also require that states parties abstain from imposing discriminatory practices relating to women’s health status and needs.[[34]](#footnote-34) This includes the provision of such services listed above. The Strategy includes no measures designed to address the sexual health of victims of human trafficking.

4.3 In the context of asylum and immigration, the CEDAW Committee recommended that state parties adopt a gender-sensitive approach, noting that trafficking in human beings is a form of gender-related persecution and, as such, women “should enjoy right of access to asylum procedures without discrimination”.[[35]](#footnote-35) As part of Strategic Priority 2, the Strategy proposes the action of putting “discretionary leave arrangements in place for victims who are assisting with criminal justice proceedings or where personal circumstances warrant it”.[[36]](#footnote-36) However, the CEDAW Committee has advised against this conditional provision of support in its General Recommendation No. 33 on access to justice:

The Committee recommends to States Parties that they: […] (f) refrain from conditioning the provision of support and assistance to women, including the granting of residency permits, upon cooperation with judicial authorities in cases of trafficking in human beings.[[37]](#footnote-37)

Whilst recognising the value of co-operating with the authorities, the Commission believes that victims of human trafficking should be given appropriate status without conditions.

4.4 The Committee on the Rights of the Child (CRC Committee) in its General Comment No. 6 has recommended that states should appoint a guardian for unaccompanied minors who should be consulted and informed of all matters relating to the interests of the child.[[38]](#footnote-38) The guardian must have the authority to be present at all decision-making processes and have the relevant expertise in childcare or a related field. The Commission notes that the Independent Guardian Regulations for children provided under section 21(5) of the 2015 Act have not yet been finalised by the NI Assembly and that, accordingly, the action contained in the 2015/16 Strategy has not been fulfilled.[[39]](#footnote-39)

4.5 The Commission welcomes the Health and Social Care Board annual profile on all separated, and potentially trafficked children. However, the Commission recommends that the Strategy should ensure that the annual profile outlines in detail how Health and Social Care Trusts will safeguard and protect the interests of children given that children have gone missing whilst in the care of the Trust and who are at risk of being trafficked.[[40]](#footnote-40) Moreover, the annual profile should record any further such incidences.

**4.6 The Commission recommends that the Strategy commit the Department of Justice to effective liaison with the Department of Health to ensure the sexual health of victims of human trafficking is addressed.**

**4.7 The Commission advises the Department to remove any conditions attached to the provision of support services, including the requirement of assisting in criminal justice proceedings. The Commission advises that the focus on vulnerable groups, particularly women and children, in international human rights instruments should be reflected in the Strategy by outlining more specific actions aimed at female and child victims of human trafficking.**

**4.8 The Commission advises that the Independent Guardian Regulations for children be promptly enacted. The Strategy should more accurately reflect the steps required to meet this objective and further detail the measures required to effectively implement the Regulations.**

**4.9 The Commission recommends that the Strategy should detail how Health and Social Care Trusts will safeguard and protect the interests of children who have gone missing whilst in the care of the Trust and who are at risk of being trafficked.**

**Strategic Priority 3: Prevent**

5.1 The Commission welcomes the range of support services proposed by the Strategy. However, these extend mostly to awareness-raising and engagement with “at risk” groups rather than taking proactive steps to address the underlying causes of trafficking in human beings.[[41]](#footnote-41) UN Trafficking Protocol, Article 9(4) obliges states parties to

[t]ake or strengthen measures, including through bilateral or multilateral cooperation, to alleviate the factors that make persons, especially women and children, vulnerable to trafficking, such as poverty, underdevelopment and lack of equal opportunity.

5.2 The CEDAW Committee has noted that “poverty and unemployment increase opportunities for trafficking in women” and the UN Recommended Principles have emphasised the importance of addressing such factors in human trafficking strategies:[[42]](#footnote-42)

Strategies aimed at preventing trafficking should take into account demand as a root cause. States and inter-governmental organisations should also take into account the factors that increase vulnerability to trafficking, including inequality, poverty and all forms of discrimination and prejudice.[[43]](#footnote-43)

5.3 The Commission also recognises the importance of robust criminalisation, investigation and prosecution of perpetrators of human trafficking offences. The Strategy should therefore outline in greater detail the measures proposed to increase the rate of prosecution for human trafficking offences. In particular, the Strategy should further specify the measures to be taken in Northern Ireland to ensure the wider extra-territorial application of the UK’s international human rights standards are met in cooperation with relevant public bodies.

**5.4 The Commission recommends that the Strategy be linked to cross-departmental efforts aimed at reducing poverty among “at risk” groups. The Department should be cognisant of the need for outcomes going beyond increased public awareness and be proactive in tackling the underlying causes of demand to prevent instances of trafficking in human beings.**

**5.5 The Commission recommends that the Strategy provide further detail on the steps to be taken to continuously learn from ongoing cases so as to better inform policy and practice.**

**5.6 The Commission advises that, in order to ensure the effective investigation and prosecution of human trafficking offences, the Department should outline the steps it will take to ensure the effective extraterritorial application of international human rights standards in cases of cross-border human trafficking.**

**Strategic Priority 4: Partnership**

6.1 The Commission welcomes the depth of engagement and cooperation with relevant stakeholders in implementing the Strategy.[[44]](#footnote-44) However, the Strategy does not explicitly mention the role of businesses in combating human trafficking. In its legislative consent motion extending certain provisions of the UK Modern Slavery Bill to NI, the NI Assembly adopted section 54 which requires large companies to prepare an annual slavery and trafficking statement.[[45]](#footnote-45) The Commission considers that the Strategy should outline how Departments and statutory agencies intend to engage with businesses in combating human trafficking despite the duty incumbent upon them under the Modern Slavery Act.

6.2 The Ruggie Principles, Principle 11 requires that businesses respect human rights and Principle 15 states that businesses should have in place a human rights policy, human rights due diligence procedures and a remediation process in order to fulfil their responsibilities in this regard. The state should enforce laws aimed at ensuring businesses protect human rights and provide guidance on how best to achieve this.[[46]](#footnote-46) The UN has also promoted the Reporting Framework designed to assist companies to report on their human rights performance.

6.3 The Human Rights Act, section 6 places a duty on public authorities to comply with human rights. This extends to contracts entered into by public authorities for the delivery of public services, such as housing, health and social care, security services, management of prisons and detention facilities.[[47]](#footnote-47) These statutory duties are relevant insofar as the Strategy mandates civil society organisations to implement some of the actions detailed in the Strategy.

6.4 The CRC Committee in its 2016 concluding observations urged the UK to require businesses to “undertake child-rights due diligence” and to ensure that the business sector comply with the rights of the child, particularly in the context of public procurement.[[48]](#footnote-48) The Commission recommends that the Department specify measures to be taken in accordance with the Modern Slavery Act to engage with and ensure businesses fulfil their human rights responsibilities in its supply chains and business operations. In order to facilitate this, the Commission recommends that the Department, alongside the Departments of the Economy and Finance, consider engaging with the Business & Human Rights Forum in NI.[[49]](#footnote-49)

**6.5 The Commission recommends that the Strategy specify the measures to be taken to fulfil the Department’s duties under the Human Rights Act where public services are contracted out.**

**6.6 The Strategy should further detail the measures to be taken by the Department to engage with and ensure businesses fulfil their human rights responsibilities in accordance with international standards and the Modern Slavery Act.**

1. Northern Ireland Act 1998, section 69(1). [↑](#footnote-ref-1)
2. DOJNI, ‘Draft Northern Ireland Human Trafficking and Modern Slavery Strategy 2016/17’, 1 July 2016, available at: <https://www.justice-ni.gov.uk/sites/default/files/consultations/justice/human-trafficking-strategy-consultation-2016-17.pdf> (“2016/17 Strategy”). [↑](#footnote-ref-2)
3. The UK ratified the ECHR in 1951. [↑](#footnote-ref-3)
4. Ratified by the UK in 1976. [↑](#footnote-ref-4)
5. Ratified by the UK in 1976. [↑](#footnote-ref-5)
6. Ratified by the UK in 1981. [↑](#footnote-ref-6)
7. Ratified by the UK in 1991. [↑](#footnote-ref-7)
8. Ratified by the UK in 1954. [↑](#footnote-ref-8)
9. Ratified by the UK in 2006. [↑](#footnote-ref-9)
10. Ratified by the UK in 2006. [↑](#footnote-ref-10)
11. Ratified by the UK in 2009. [↑](#footnote-ref-11)
12. Signed by the UK in 2008. [↑](#footnote-ref-12)
13. Ratified by the UK in 2008. [↑](#footnote-ref-13)
14. In addition, the Northern Ireland Act 1998, section 26 (1) provides that ‘if the Secretary of State considers that any action proposed to be taken by a Minister or Northern Ireland department would be incompatible with any international obligations... he may by order direct that the proposed action shall not be taken’. Moreover the Northern Ireland Act 1998, section 24(1) states that ‘a Minister or Northern Ireland department has no power to make, confirm or approve any subordinate legislation, or to do any act, so far as the legislation or act – (a) is incompatible with any of the Convention rights’. [↑](#footnote-ref-14)
15. DOJNI, ‘Equality Screening Form: Draft Northern Ireland Human Trafficking and Exploitation Strategy 2016/17’ (2016). [↑](#footnote-ref-15)
16. Human Rights Committee, General Comment No. 31 (2004), para. 12. [↑](#footnote-ref-16)
17. The principle of non-refoulement is also considered to be a rule of customary international law applicable to all states and their devolved administrations. [↑](#footnote-ref-17)
18. Human Rights Committee, *Kindler v Canada* (470/91). [↑](#footnote-ref-18)
19. UN Trafficking Protocol, Articles 5 and 6. [↑](#footnote-ref-19)
20. CEDAW Committee, General Recommendation No. 32 (2014), paras 44-46. [↑](#footnote-ref-20)
21. See, CoE Sexual Exploitation Convention and CRC Optional Protocol on Child Prostitution. [↑](#footnote-ref-21)
22. See, CoE Sexual Exploitation Convention, Articles 4, 5, 8, 9, 12-14 and 35. [↑](#footnote-ref-22)
23. CoE Trafficking Convention, Article 5(3). [↑](#footnote-ref-23)
24. UN Trafficking Protocol, Article 10. [↑](#footnote-ref-24)
25. OHCHR Recommended Principles, Guideline 1. [↑](#footnote-ref-25)
26. 2016/17 Strategy, para. 1.9; UK Independent Anti-Slavery Commissioner, ‘Strategic Plan 2015-2017’, October 2015, p. 3, available at: <https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/468729/IASC_StrategicPlan_2015.pdf>. [↑](#footnote-ref-26)
27. Office of the High Commissioner for Human Rights, ‘Developing National Action Plans Against Racial Discrimination: A Practical Guide’ (2014), pp 95-98, available at: <http://www.ohchr.org/Documents/Publications/HR-PUB-13-03.pdf>. [↑](#footnote-ref-27)
28. 2016/17 Strategy, pp 20, 23, 29. [↑](#footnote-ref-28)
29. 2016/17 Strategy, p. 23. [↑](#footnote-ref-29)
30. OHCHR Practical Guide, p. 98. [↑](#footnote-ref-30)
31. Human Trafficking and Exploitation (Criminal Justice and Support to Victims) Act (Northern Ireland) 2015, sections 1-3. [↑](#footnote-ref-31)
32. 2016/17 Strategy, pp 23-25. [↑](#footnote-ref-32)
33. CEDAW Committee, General Recommendation No. 24 (1999), para. 18. [↑](#footnote-ref-33)
34. CEDAW Committee, General Recommendation No. 14 (1990). [↑](#footnote-ref-34)
35. CEDAW Committee, General Recommendation No. 32 (2014), paras 44-45. [↑](#footnote-ref-35)
36. 2016/17 Strategy, p. 25. [↑](#footnote-ref-36)
37. CEDAW Committee, General Recommendation No. 33 (2015), para. 51. [↑](#footnote-ref-37)
38. CRC Committee, General Comment No. 6 (2006), para. 33. [↑](#footnote-ref-38)
39. See, 2015/16 Strategy, p. 24. [↑](#footnote-ref-39)
40. BBC News, ‘Eight child migrants go missing from NI authorities’ care’, 31 May 2016. [↑](#footnote-ref-40)
41. 2016/17 Strategy, pp 27-28. [↑](#footnote-ref-41)
42. CEDAW Committee, General Recommendation No. 19 (1986), para. 14. [↑](#footnote-ref-42)
43. UN Recommended Principles, Guideline 7. [↑](#footnote-ref-43)
44. 2016/17 Strategy, pp 29-30. [↑](#footnote-ref-44)
45. NI Assembly, Legislative Consent Motion: Modern Slavery Bill, 8 December 2014. [↑](#footnote-ref-45)
46. Ruggie Principles, Principle 3(a) and (c). [↑](#footnote-ref-46)
47. NIHRC, Public Procurement and Human Rights in Northern Ireland, November 2013, p. 7, <http://www.nihrc.org/uploads/publications/NIHRC_Public_Procurement_and_Human_Rights.pdf>. [↑](#footnote-ref-47)
48. CRC Committee, Concluding observations on the fifth periodic report of the United Kingdom of Great Britain and Northern Ireland (2016), para. 19. [↑](#footnote-ref-48)
49. See, <http://www.nihrc.org/business-human-rights-forum>. [↑](#footnote-ref-49)