

Committee of the Parties
to the Council of Europe Convention
on Action against Trafficking in Human Beings



CP(2018)21

**Report submitted by the Irish authorities
on measures taken to comply with
Committee of the Parties Recommendation
CP(2017)29 on the implementation
of the Council of Europe Convention
on Action against Trafficking in Human Beings**

Second evaluation round

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Ce document n'est disponible qu'en anglais.

**An Roinn Dlí agus Cúirt
agus Comhionannais
Department of Justice
and Equality**



Ms Petya Nestorova
Executive Secretary
Council of Europe Convention on Action against Trafficking in Human Beings
[Greta and Committee of the Parties]
Directorate General II – Democracy
Council of Europe
67075 Strasbourg Cedex
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Your Ref: DG-II/PN/mc

Dear Ms Nestorova,

Re: Follow up to the recommendation of the Committee of the Parties on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Ireland

I am pleased to enclose an update from Ireland on the measures taken to implement the recommendations of the Group of Experts on Action against Trafficking in Human Beings (GRETA).

While much has been done in Ireland in the area of preventing and combating human trafficking, I remain of the view that there is much to be learned from independent evaluations of our approach to this issue. The Irish Government continues to be committed to tackling the issue of human trafficking, supporting victims and pursuing traffickers.

The role undertaken by GRETA in monitoring the implementation of the Convention in Ireland has been an important contribution in the development of our policies and practices to combat this most heinous human rights abuse.

I welcome the positive comments made in the Final Report regarding our efforts to date and will continue to carefully consider the recommendations of GRETA in relation to our approach.

Yours sincerely,

Paul Gunning
Anti-Human Trafficking Unit
15 October 2018

Appendix 1 - Report to the Committee of the Parties on the recommendations on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Ireland

The Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings recommended that the Irish authorities take measures to address the following issues for action identified in GRETA's second evaluation report of 20 September 2016:

Ensure that victims of trafficking are identified proactively and without delay, including by:

Reviewing as a matter of priority the victim identification procedure and decision making process, in the light of the case P. v. The Chief Superintendent of the Garda National Immigration Bureau & Ors. and the recommendations made in GRETA's first report. The aim of the reviewed procedure should be to cover all victims, including EEA and Irish citizens, as well as asylum seekers, and to formalise the decision-making process by specifying the requirements for a "reasonable grounds" decision and the rights which flow from it;

The Second National Action Plan to Prevent and Combat Human Trafficking in Ireland included a commitment to an examination of procedures for the identification of victims of trafficking. Work on this has continued in 2017 and 2018. The priority in the ongoing review of the victim identification process has been to improve and formalise an approach which already serves the vast majority of victims very well and is broadly in compliance with Ireland's obligations under the Convention. While the review is still not complete, the work to identify issues and potential weaknesses in the system has already given rise to improvements in handling individual cases in a more timely and transparent way. Among these positive developments are that mandated Recovery and Reflection periods are now being implemented in all cases and improved procedures are also in place aimed at reducing delays in renewing temporary permissions to remain (for those who require it) based on cooperation with trafficking investigations.

It is important to restate that it has always been the policy of Ireland that identification applies to all victims, including EEA and Irish citizens and asylum seekers, and that this has been documented through all of the Government's annual reports on human trafficking. All suspected victims are admitted to the National Referral Mechanism, whose supports are fully documented in the published Statement of Roles and Responsibilities. A minority of identified victims also require residence permissions because they do not have an existing right of residence (whether as an EEA National or a person in the International Protection System). This minority are given residence permissions under the Administrative Immigration Arrangements for Victims of Human Trafficking. This does not mean that only that minority have been identified and admitted into the National Referral Mechanism.

- Promoting multi-agency involvement in the identification of victims of trafficking by giving a formal role in the identification process to frontline actors such as NGOs, labour inspectors, social workers, health-care staff and other bodies which may come into contact with victims of trafficking;

A series of meetings with An Garda Síochána and major NGOs involved in the identification process were held throughout 2017 and 2018 to identify further perceived problems with existing administrative structures. These included a Victim Identification Working Group in April 2017, and specific meetings with An Garda Síochána in August, September and November 2017 and in May, July and October 2018. Meetings of the Interdepartmental High Level Group took place in December 2017 and March 2018 with the identification review discussed at both. It is intended that the outcome of the review will include a formalisation of the key role already played in identification by front line actors.

- Ensuring that whenever there are reasonable grounds to believe that a person is a victim of trafficking on the basis of operational indicators, he/she is provided with all the assistance and protection measures provided for in the Convention, regardless of whether

an investigation into trafficking is opened and whether the person co-operates in the investigation;

- Enact statutory rights to assistance and protection for possible victims of trafficking, as specified in Articles 10 and 12 of the Convention, regardless of the victims' nationality or immigration status;

Ensure that all possible foreign victims of trafficking, including EEA nationals, are offered a recovery and reflection period and all the measures of protection and assistance envisaged in Article 12, paragraphs 1 and 2, of the Convention during this period. Officers performing identification should be issued with clear instructions stressing the need to offer the recovery and reflection period as defined in the Convention, i.e. not making it conditional on the victim's co-operation and offering it to victims before formal statements are made to investigators;

When potential victims of trafficking are referred to or detected by An Garda Síochána, they are immediately entered into the state's National Referral Mechanism. Within the NRM, they are provided with full measures of protection and assistance, including accommodation, individual care plans drawn up by the HSE's Anti-Human Trafficking Team, and complementary social and healthcare services provided by state agencies and state-funded NGOs. These services include immigration permission (if needed), legal aid/advice, translation and interpretation services, and employment and vocational training. Victims are always offered support in returning home, if they wish to do so. These supports are offered regardless of whether an investigation is opened, or whether the person co-operates in an investigation. As mentioned previously, new procedures now ensure that all suspected victims, regardless of nationality, are offered a 60-day recover and reflection period.

The state understands that victims may be distrustful of people in authority and of the motives of those who are trying to help them. In cases such as this where victims are reluctant to be referred to An Garda Síochána there is a support network of NGOs that act as a vital safety net.

- Ensuring that frontline staff are provided with regular training, guidance, toolkits and criteria for the identification and referral of victims of trafficking;

Ireland is committed to achieving best practice in its victim centred approach to combating human trafficking. For this purpose, the relevant authorities in Ireland have continued to fund and deliver a variety of specialised anti-human trafficking training to State Officials. Particular emphasis in this training is placed on the identification of, and onward referral to appropriate assistance to, suspected victims of human trafficking. An Garda Síochána plays a leading role in this process. Human Rights issues as they pertain to human trafficking are a fundamental component of training measures.

Since our evaluation by GRETA in 2016, we have further enhanced our training procedures by delivering focused victim centred presentations as part of training initiatives to frontline officials working in the Border Management Unit at Dublin Airport. The training courses have been developed and delivered by the Human Trafficking Investigation and Co-Ordination Unit.

Within An Garda Síochána, the specific human trafficking course 'Tackling Trafficking in Human Beings – Prevention, Protection, Prosecution and Partnership' continues to be delivered on regular basis to all levels of the force, including both trainee officers and senior investigation officers. Members of the Human Trafficking Investigation and Co-Ordination Unit continue to receive human trafficking training both in Ireland and on an international basis. In this regard training has been received through CEPOL (European Police College), European Commission, Europol and Eurojust.

For the first time in 2017 training has been provided to staff of Banks and Financial Institutions by the Human Trafficking Investigation and Coordination Unit. The objective of this training is to create

improved identification of suspicious transactions with a view to aiding financial investigations into perpetrators of human trafficking.

- Pursuing a proactive approach to the identification of victims of trafficking for the purpose of labour exploitation by encouraging regular and co-ordinated multi-agency inspections in sectors most at risk;

In addition to the deterrent effect of the law, consumer and investor demand are leading to greater awareness amongst companies of the need for human rights compliance in their supply chains. This includes ensuring trafficked labour does not form part of a business, whether in Ireland or overseas. The Government supports this work in a number of ways across different Departments and Agencies.

The creation of a culture of compliance with employment rights aims to reduce the opportunities for exploitation and expose non-compliant employers. One of the Workplace Relations Commission's core services is to provide information to the public. In 2017, the WRC provided information on employment rights to over 52,000 telephone callers. In addition over 500,000 users visited the WRC website and 54 presentations on employment rights were made to relevant groups.

Ireland's National Plan on Corporate Social Responsibility 2017-2020 is an action-orientated plan aimed at supporting businesses and organisations of all sizes and all sectors to adopt responsible business practices. The plan outlines the Four Core Dimensions of CSR and contains 17 actions which are intended to improve the competitiveness and the ability to attract talent of businesses operating in Ireland while fostering social cohesion and protecting the environment.

The Anti-Human Trafficking Unit (AHTU) submitted observations to the Department of Business, Enterprise and Innovation on the Draft Plan and we welcome the complementarity between this Plan and the second National Action Plan to Prevent and Combat Human Trafficking in Ireland. Action No.19 of the Second National Action Plan to Prevent and Combat Human Trafficking in Ireland commits government to "Work with civil society, trade unions and business representatives to explore effective methodologies to reduce the demand for all forms of trafficking."

Responsible supply chain management, responsible procurement and increased transparency through financial reporting, contained in the National Plan on Corporate Social Responsibility are each seen as measures which can reduce the risk of human trafficking. Businesses with a supply chain that includes trafficked labour and consumers who purchase products made by enslaved labour are considered as part of demand reduction strategies.

AHTU engages with officials from the Department of Business, Enterprise and Innovation as lead Department, to enable ratification of Optional Protocol No. 29 to the Forced Labour Convention of the International Labour Organisation. That Protocol further strengthens the international legal framework against forced labour, including by supporting due diligence by public and private sectors to prevent and respond to risks of forced or exploitative labour practices.

Ireland's National Plan on Business and Human Rights 2017-2020, recently launched by the Department of Foreign Affairs and Trade, aims to give effect to the UN Guiding Principles on Business and Human Rights. It includes in its initial priorities for the Implementation Group, the encouragement and facilitation of the sharing of best practice on human rights due diligence, including effective supply chain audits. As regards public procurement, various EU Directives which have been transposed into Irish law contain specific provisions excluding tenderers who are guilty of certain human rights infringements, including trafficking in human beings, from participating in public procurement.

- Ensuring that victims of trafficking have early access to legal practitioners with specialised knowledge of human trafficking who can represent them;

The Legal Aid Board has continued to provide legal services on certain matters to persons identified as potential victims of human trafficking under the Criminal Law (Human Trafficking) Act 2008. There is no

requirement to satisfy the Board's financial eligibility or merits criteria for these cases and a potential victim of human trafficking is not required to make a financial contribution to the Board. The service is provided by Board employees who have received specialised training in human trafficking issues.

The Board provides legal services to persons identified as potential victims of human trafficking on their rights in relation to a range of issues including their status in the State, seeking international protection, seeking redress through the employment protection legislation (legal advice only), information on what is involved in a criminal trial, information on compensation, and information on voluntary return home. The Board also provide representation in court in a criminal trial where a victim's past sexual history is raised.

- Monitoring closely the relationship between asylum and human trafficking with a view to ensuring that the right to seek and enjoy asylum does not impede identification as a victim of trafficking;

International protection applicants are not required to choose between identification as a victim of trafficking and international protection. Annual Reports produced by Ireland have always included statistics on all suspected victims of trafficking, identified as such and accessing a range of services through the National Referral Mechanism. These include those who are in the asylum process, those who are EEA nationals, and non-EEA nationals to whom the Administrative Immigration Arrangements apply. Human trafficking victims within the International Protection System are admitted to the National Referral Mechanism on the same terms and receive the same supports as all other identified victims.

The only difference in treatment is that, since they already have a residence permission arising from their status in the International Protection System, they are not given a residence permission under the Administrative Immigration Arrangements. The International Protection Office continues to improve its capacity to detect indicators of human trafficking in persons within its remit and refer them to AGS for possible identification and entry into the National Referral Mechanism, and takes the possible risks to victims into account in its consideration of applications for International Protection.

Improve the provision of assistance to victims of trafficking, and in particular:

- Improving the identification of victims of trafficking in detention centres, by giving access to such centres to specialised NGOs and lawyers, and ensuring that following a positive reasonable grounds decision, presumed victims of trafficking are speedily removed from detention and offered assistance and protection as provided in the Convention;

- Review as a matter of priority the policy of accommodating presumed victims of trafficking in accommodation centres for asylum seekers, with a view to ensuring that the accommodation is gender-sensitive, appropriate and safe, and that victims are provided with specialised services. As a first step, the authorities should set up as a pilot a specialised shelter, with dedicated, trained personnel. In addition to better support and protection of the victims, this would also be in the interest of the investigation;

The AHTU has engaged with the Reception and Integration Agency in relation to the possibility of providing a specialised shelter for victims of trafficking. Consultations in this regard continue. Consultation is also underway with concerned NGOs to identify whether there is a role that they can play in delivery of specialised accommodation.

The accommodation criticism comes against the background of real improvements to the system of Direct Provision which is the means through which services, including accommodation, are provided to asylum seekers and is available to victims of trafficking. The general improvements in direct provision centres, were complemented by targeted funding aimed at improving the experience of victims of trafficking within these centres.

2017 also saw the publication of the third and final progress report of the Working Group on Improvements to the Protection process, including Direct Provision, with 133 recommendations implemented and another 36 either partially implemented or in progress, representing 98% of total recommendations. Also this year, the remit of the Ombudsman was extended to provide independent redress to those living in Direct Provision accommodation. (The First Report of the Ombudsman on Direct Provision was published in January 2018).

The AHTU funded the Immigrant Council of Ireland (ICI), through the Dormant Accounts Fund, to develop the Moving On Project; a training programme aimed towards Reception and Integration Agency (RIA) Centre Staff, Department of Employment Affairs and Social Protection (DEASP) personnel and victims of human trafficking. Their aims were to increase awareness and competence on Human Trafficking, its signs and the provision of assistance and protection of victims.

The ICI delivered trainings nationally, as well as conducting information sessions with residents in RIA accommodation to raise awareness of the crime of trafficking and supports available to victims.

Project TRACKS – Identification of Trafficked Asylum Seekers’ Special Needs was also carried out by the Immigrant Council of Ireland, and funded by the European Commission under the HOME/2014/AMIF/AG/ASYL funding programme. This resulted in a Toolkit intended for practitioners who have direct contact with asylum seekers and victims of trafficking, including identified and potential victims, in their everyday work. It advises how to detect trafficking victims in the asylum process; how to react when such suspicions arise; and to offer suggestions for referring victims.

Take measures to ensure that avenues for compensation are easily accessible to trafficked people, and in particular:

- **Encourage prosecutors to request compensation orders in all relevant cases;**
- **Make the State compensation scheme effectively accessible to victims of trafficking, which would require a review of the current conditions for eligibility;**
- **Enable victims of trafficking to exercise their right to compensation, by building the capacity of legal practitioners to support victims to claim compensation;**
- **Include victim compensation into training programmes for law enforcement officials, prosecutors and judges;**
- **Make full use of the existing legislation on the freezing and forfeiture of assets to secure compensation to victims of trafficking;**

With regard to the possibility of court ordered compensation, the Anti-Human Trafficking Unit has written to the Office of the Director of Public Prosecutions to highlight the need for prosecutors to be aware of compensation possibilities associated with prosecutions. It should be kept in mind that the Office is independent in the performance of its functions. To date, we are not aware of any instances where such an opportunity may have arisen.

The State system of direct support to victims of trafficking through the provision of accommodation and services and generous NGO funding, continues to be the principal means of compensation made available to victims of trafficking in Ireland.

The lack of prosecutions, including, in many cases, the lack of sufficient basic information to detect and identify any perpetrator, mitigates against access to formal compensation schemes as detailed below. There are a number of methods of obtaining compensation currently available to victims in Ireland as follows:

- Court Order for payment of compensation under Section 6 of the Criminal Justice Act 1993;
- Civil Action to claim damages taken either under legislative or common law rules which may relate to an employment situation or personal injuries;
- State bodies dealing specifically with work related rights and entitlements;

- Criminal Injuries Compensation Tribunal.

Human trafficking victims in Ireland can file civil suits against trafficking offenders. Victims of trafficking may also initiate a civil claim for damages and compensation from their country of origin. The Employment Permits (Amendment) Act enacted in July 2014 seeks to address the deficiency where a foreign national could not enforce employment rights if a contract of employment was unlawful due to a failure to have an employment permit. The Act provides that it is a defence for the foreign national to the charge of having being without an employment permit where the foreign national can show that all reasonable steps to comply with the requirement to have an employment permit were taken by him/her. The Act also provides that the Minister may take a civil action on the foreign national's behalf for compensation for work done or services rendered as well as responsibility for the cost of such action.

In consideration of our obligations under the Convention, we are satisfied that victims' needs are sufficiently met through a system of statutory services backed up by generous funding to NGO partners. The system of social supports, including not only Direct Provision, healthcare and education, but also generous funding of services through NGOs, functions as a form of benefit-in-kind for victims. Channelling funding in this way meets the same end-goal of assisting in the recovery and reintegration of victims.

Take further measures to ensure compliance with Article 26 of the Convention, including by:

- **Adopting a specific legal provision on the non-punishment of victims of trafficking for their involvement in unlawful activities, to the extent that they were compelled to do so, and/or developing detailed, updated guidance for police officers and prosecutors on the aims and scope of the non-punishment provision;**
- **Encouraging prosecutors to consider trafficking in human beings as a serious violation of human rights when assessing the public interest of prosecuting identified victims of trafficking;**
- **Including the non-punishment provision in the training of police officers, prosecutors, judges and lawyers;**

Garda guidance put in place since the case of *P. v. The Chief Superintendent of the Garda National Immigration Bureau & Ors* provides for the separation of the criminal investigation and the trafficking identification procedure.

The position remains that during the investigation into trafficking, the criminal investigation can proceed to trial. The Office of the Director of Public Prosecutions has extensive guidance for prosecutors on the public interest in pursuing prosecutions. They cite human trafficking as a specific example and list specific factors to be taken into account in deciding whether to commence or continue a prosecution. Training for all frontline officers in the police focus on the safety and care of suspected victims of trafficking, including where suspected victims are found in criminal situations. The state's response meets EU obligations in ensuring our authorities are 'entitled not to prosecute or impose penalties' in such scenarios.

In this regard it is worth highlighting that in one criminal prosecution in 2018 the question of whether the defendants were trafficked was addressed by the court, and the case itself was adjourned in order to allow the parallel investigation into the trafficking allegation to be concluded. While ultimately the court concluded that the allegations had been sufficiently borne out, it was a clear demonstration of the improved investigatory mechanisms being put into practice and of judicial awareness of the issues surrounding trafficking, including in the way in which the Court addressed vulnerability issues in final sentencing.

Take measures to ensure that human trafficking offences are investigated and prosecuted effectively, leading to proportionate and dissuasive sanctions, in particular by:

- **Encouraging the Office of the Director of Public Prosecutions to further develop their specialism in human trafficking with a view to successfully prosecuting more traffickers;**
- **Ensuring that units investigating human trafficking offences are properly resourced;**
- **Continuing to improve the knowledge of investigators, prosecutors and judges about the seriousness of trafficking in human beings, the severe impact of exploitation on the victims and the need to respect their human rights.**
- **Reviewing the legislation and the investigation/prosecution procedure with a view to identifying and addressing gaps (e.g. in relation to trafficking for the purpose of labour exploitation/forced labour and the setting up Joint Investigation Teams);**
- **Strengthening efforts to investigate and prosecute cases of trafficking for the purpose of labour exploitation.**

Resourcing increased significantly within An Garda Síochána in 2017. As part of the Transformation and Renewal Programme, Divisional Protective Service Units were formed in 3 Garda Divisions, with plans proceeding to put in place these Units in the remaining 25 Garda Divisions. Additional research and clerical staff bolstered the investigative capacity of the Human Trafficking Investigation and Coordination Unit. Further increases in resources are planned before the end of 2018.

The Policing Authority's [Code of Ethics for the Garda Síochána](#) (published in 2017) further emphasises the importance of a human rights-based approach to policing in Ireland and notes that the responsibilities relating to human rights are underpinned by the Irish Constitution, and human rights law including the European Convention of Human Rights.

The October 2018 [Report on the Future of Policing in Ireland](#) proceeds from the premise that human rights is the foundation of policing and the perspectives underpinning this report will be central to the continuing reform of An Garda Síochána in coming years.

The commitment of the organisation is to delivery of services which ensure compliance with, reinforce and enhance human rights standards at all levels and in all areas in An Garda Síochána. In this regard Section 7 (1) of the Garda Síochána Act 2005 sets out one of the core functions of An Garda Síochána vindicating the human rights of each individual and places the protection and vindication of human rights at the heart of the policing function.

An Garda Síochána's approach is currently led by Deputy Commissioner Policing and Security and focuses on the following areas:

- Development of a Human Rights Framework and Human Rights Compliance Process which provides a structure for the development, implementation and monitoring of human rights compliance consistently across policy, training and operations
- Establishment of a human rights advisory unit within the organisation, with specific human rights legal expertise to provide advice and guidance on human rights issues (see below)
- Provision of a Garda Síochána Decision Making model, focused on ethical and human rights standards, to ensure that Gardaí and Garda Staff accurately document all relevant information including the rationale for decisions and action taken to ensure compliance with ethics and human rights standards
- Provision of a Policy framework to ensure that all policies, procedures and guidance issued by An Garda Síochána are human rights proofed. The policy framework particularly
- Incorporation of human rights standards in all training and learning programmes
- Adopting a consultative process with statutory and non-governmental agencies who have a remit in the area of human rights under the Strategic Human Rights Advisory Committee.

The 5 critical elements of An Garda Síochána's approach are currently under implementation and their remit extends through the development of policy and training for all operational policing functions

including the development of policy, operational process and training interventions to address human trafficking and exploitation of victims.

The human rights advisory unit within the organisation, with specific human rights legal expertise to provide advice and guidance on human rights issues is a stand-alone Human Rights Division located within Garda Legal under Chief Superintendent Crime Legal, who in turn reports to the Executive Director (Legal). Staffing of this Division has commenced, and the business case for its full resourcing has been submitted and is under active consideration by the Policing Authority.

The Santa Marta North Atlantic Maritime Group has established a project to increase knowledge of human trafficking in general, with one of its core objectives to help put the care of victims at the centre of law enforcement approaches to trafficking. This should aid in increasing investigators knowledge and understanding of criminal exploitation of victims of human trafficking.

In recognition of the need to raise awareness and engagement by prosecutors in the area of human trafficking, prosecutors from the Office of the Director of Public Prosecutions have attended training seminars on human trafficking (April 2017, December 2017 and June 2018). These international seminars, hosted by the ERA (Academy of European Law) focused on financial investigations in human trafficking; assisting victims of trafficking for sexual exploitation; and demand reduction in relation to trafficking in human beings for sexual exploitation.

Appendix 2 - Significant developments in Ireland's response to human trafficking

Enactment of the Criminal Law (Sexual Offences) Act

The Criminal Law (Sexual Offences) Act 2017 is a major piece of reforming legislation with substantial amendment to the law as it relates to the purchase of sexual services, and new and reforming legislation concerning the sexual exploitation of children. Enacted on 22 February 2017, Part 4 of the Act criminalises the purchase of sexual services while removing those who provide sexual services from the existing offences of soliciting or loitering for the purpose of prostitution.

The Act itself and the provisions referred to above, recognise the exploitation experienced by those involved in prostitution and decriminalises them. Decriminalising the seller allows people to exit prostitution without being criminalised, and encourages them to come forward and seek the assistance and supports that they may require. The aim of criminalising the purchase of sexual services is to reduce demand for both those in prostitution, and for sexually exploited victims of trafficking.

With the passing of this Act, the AHTU has taken on new responsibilities for prostitution policy in addition to that of trafficking in human beings. This new role includes liaising with concerned stakeholders, An Garda Síochána, and a variety of NGOs.

Part 4 of the Act concerning the criminalisation of the purchase of sex is due to be reviewed in 2020 and will include an assessment of the impact on the welfare of those who engage in sexual activity for payment, as well as statistics on prosecutions and convictions. The AHTU has made invited applications for funding for research into the welfare effects of the legislation and expects to be in a position to award grants for research projects in the very near future.

Reclassification of Victim Data

Since 2009, victims of crimes prosecuted under section 3(2) of the Child Trafficking & Pornography Act 1998 [as amended by Criminal Law (Human Trafficking) Act 2008], had been reported as victims of human trafficking. Having reviewed both reporting practice elsewhere and the specific details of the cases in question, we have realigned our classifications beginning with our [Annual Report for 2017](#).

Charges brought under the above section relate to offences of sexual exploitation. Generally, the offence has been committed against an Irish child, without the involvement of a third party and without any commercial element. Furthermore, the offender is usually somebody known to the victim, and the offence has occurred without any significant movement or 'Act' as outlined above. As international

evaluations have consistently queried the inclusion of child sexual exploitation statistics, not generally deeming them to amount to trafficking, we have decided to exclude these cases from our reports of trafficking in children. This is intended to provide a more accurate picture of the extent of trafficking in Ireland, while making Irish data more comparable to that of other jurisdictions.

UNODC Research

In 2017, the AHTU participated in a UNODC (United Nations Office of Drugs and Crime) multi-country research project aimed at estimating the number of trafficking victims. The aim of the research was to develop a better understanding of the variance in numbers between victims who are known to the Authorities and/or NGOs, and the large number of victims who are not discovered. The researchers found that the 'hidden' figure for victims of trafficking in Ireland may be twice the number of identified victims. This compares very favourably with other jurisdictions where hidden figures were estimated to be a much greater multiple of the identified number. This was a significant data-sharing and cooperation exercise over a number of months with publication of these results is expected in October 2018.

Human Trafficking Research Project

A new research project titled 'Human Trafficking and Exploitation in Ireland' (HTEPII) is currently taking place at Mary Immaculate College of Education. The project, as part of the Santa Marta group's activities, aims to identify, create, and analyse databases relating to information on human trafficking into and within Ireland, as well as assembling existing high-quality Irish and European data relating to this topic. In addition The HTEPII will contribute to the "practical actions" of the Santa Marta Group, specifically through objectives including designing workshops for data and information dissemination, including dissemination through and within business and community sectors, schools and HEIs, and producing an analysis of training and awareness needs across different groups and some element of curricular programming to incorporate at 2nd and/or 3rd level which would complement or update existing materials.

Awareness Campaigns

The UN GIFT box toured Ireland throughout the month of March 2017 to raise public awareness of human trafficking and modern day slavery. The exterior of the box appears as a wrapped gift covered with promises of work and education, and once inside, visitors learned about the realities behind the false promises used by criminals to lure people into trafficking. GIFT, or Global Initiative to Fight Trafficking, is an initiative of the United Nations and anti-human trafficking NGOs. Act to Prevent Trafficking (APT) is the Irish NGO which coordinated the delivery of the GIFT Box to more than a dozen locations around Ireland. The initiative was supported by the Anti-Human Trafficking Unit and by An Garda Síochána through the Human Trafficking Investigation and Coordination Unit.

In 2018 the Anti-Human Trafficking Unit is hosting a public screening of the award winning documentary "The Price of Sex" to mark EU Anti Human Trafficking Day. This documentary showcases stories from victims of sex trafficking, as told through their own words. A survivor of sex trafficking will also be in attendance to give a talk on her experiences alongside with a Q & A session with the audience. This event is seen as valuable opportunity to raise awareness among companies working in industries that would come directly in contact with victims of human trafficking, such as hotels, taxi companies, pharmacies, doctors, etc.