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## **G R E T A**

Group of Experts on Action  
against Trafficking in Human Beings

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# **Reply from Ireland to the questionnaire for the evaluation of the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings**

Fourth evaluation round

## **Thematic focus: Addressing vulnerabilities to trafficking in human beings**

Adopted by the Group of Experts on Action against  
Trafficking in Human Beings (GRETA) on 30 June 2023

**Reply submitted on 31 July 2025**

## Introduction

In accordance with Article 38, paragraph 1, of the Convention on Action against Trafficking in Human Beings (“the Convention”), GRETA evaluates the implementation of the Convention following a procedure divided into rounds. At the beginning of each round, GRETA selects the specific provisions on which the evaluation procedure is based.

The first round of monitoring of the Convention provided an overview of its implementation by States Parties. The second evaluation round of the Convention examined the impact of legislative, policy and practical measures on the prevention of trafficking in human beings (THB), the protection of the rights of victims of trafficking, and the prosecution of traffickers, paying particular attention to measures taken to address new trends in human trafficking, in particular trafficking for the purpose of labour exploitation, and the vulnerability of children to trafficking. The third evaluation round focused on trafficking victims’ access to justice and effective remedies.

GRETA has decided that the fourth evaluation round of the Convention will focus on **vulnerabilities to human trafficking** and measures taken by States Parties to prevent them, detect and support vulnerable victims, and punish the offenders. This includes a focus on the use of information and communication technology (ICT), which brings structural changes to the way offenders operate and exacerbates existing vulnerabilities.<sup>1</sup>

A number of provisions of the Convention establishing substantive and procedural obligations are relevant to this topic. The concept of “vulnerability” appears in Articles 4 (definitions), 5 (prevention of trafficking in human beings) and 12 (assistance to victims) of the Convention. According to paragraph 83 of the Explanatory report to the Convention, “by abuse of a position of vulnerability is meant abuse of any situation in which the person involved has no real and acceptable alternative to submitting to the abuse. The vulnerability may be of any kind, whether physical, psychological, emotional, family-related, social or economic. The situation might, for example, involve insecurity or illegality of the victim’s administrative status, economic dependence or fragile health. In short, the situation can be any state of hardship in which a human being is impelled to accept being exploited. Persons abusing such a situation flagrantly infringe human rights and violate human dignity and integrity, which no one can validly renounce.”

GRETA refers to the ICAT Issue Brief No. 12/2022 on Addressing vulnerability to trafficking in persons which refers to vulnerability as “those inherent, environmental or contextual factors that increase the susceptibility of an individual or group to being trafficked”. It classifies vulnerability factors in three categories: personal (e.g. age, gender, ethnicity, disability), situational (e.g. destitution, unemployment, legal status) and contextual (e.g. discriminatory laws, policies and social norms, armed conflicts, crises) factors, which interact and may increase the risk of human trafficking for certain individuals, groups and/or communities.<sup>2</sup> Vulnerability to human trafficking is also subject to intersectional factors, such as gender, belonging to a minority group and socio-economic status.

<sup>1</sup> [Paolo Campana, Online and Technology-Facilitated Trafficking in Human Beings, Council of Europe, April 2022.](#)

<sup>2</sup> [ICAT Issue Brief No. 12 on Addressing vulnerability to trafficking in persons - Search \(bing.com\)](#)

Applying a socio-ecological approach to the analysis of vulnerability to human trafficking demonstrates how different risk factors influence vulnerability, and how protective factors may reduce the risk of victimisation by increasing resilience.<sup>3</sup> The socio-ecological model considers the complex interplay between individual, relationship, community and societal factors. It helps to understand how anti-trafficking strategies should: (a) reduce the vulnerability of individuals, (b) work with the communities (which may also include relationships) concerned to ensure that their practices or current dynamics do not exacerbate or contribute to vulnerabilities to human trafficking and, (c) change a number of system-driven or structural elements (such as policies) so that they do not facilitate but discourage an environment conducive to human trafficking.

In addition to the thematic focus on vulnerabilities to human trafficking, GRETA has decided that each State Party will receive **country-specific follow-up questions** related to recommendations not implemented or partially implemented after the third evaluation round.

States Parties are requested to transmit to GRETA a reply to this questionnaire **within four months** from the date it was sent. The reply to the questionnaire should be submitted in one of the official languages of the Council of Europe (English and French), and preferably also in the original language. Where appropriate, in order to avoid unnecessary repetition, the reply may refer to information contained in the report submitted by the national authorities on measures taken to comply with the Committee of the Parties' recommendation concerning the implementation of the proposals made in GRETA's third evaluation report. States Parties should provide links, copies or extracts of relevant legislation, regulations, national action plans and case law mentioned in the reply to the questionnaire, in the original language and, wherever possible, also in one of the official languages of the Council of Europe.

A variety of stakeholders and civil society representatives should be effectively consulted in the preparation of the reply to the questionnaire, to ensure that the information provided is as comprehensive as possible.

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<sup>3</sup> [https://www.avoiceforcentraloregon.com/uploads/1/3/9/9/139904528/socio\\_ecological\\_model\\_and\\_trafficking.pdf](https://www.avoiceforcentraloregon.com/uploads/1/3/9/9/139904528/socio_ecological_model_and_trafficking.pdf)

## Part 1 – Addressing vulnerabilities to trafficking in human beings

### I. PREVENTION (Articles 5, 6 and 7)

**1. Do you have specific data/research/analysis of what makes people vulnerable to trafficking in human beings (THB) in your country? Please provide information on the categories/groups of people identified as being at risk of becoming victims of human trafficking, and how they are addressed in the national anti-trafficking strategy and/or action plan. Have you identified geographical regions or economic sectors in your country as particularly vulnerable to THB, and how do you address them in your strategy or policy?**

#### Data and Analysis of Vulnerability to THB in Ireland

Ireland's understanding of what makes individuals vulnerable to trafficking is informed by data and insights from An Garda Síochána (the Irish Police force), the Health Service Executive (HSE), International Protection Office, International Protection Accommodation Services, and NGOs such as the Migrant Rights Centre Ireland. These stakeholders work directly with potential and identified victims and provide the foundation for ongoing policy and operational responses.

The primary vulnerabilities identified relate to socio-economic disadvantage. The key "push factors" include poverty, conflict, discrimination, and a lack of economic or educational opportunities. "Pull factors" include demand for cheap labour and sexual services, and perceived opportunities for a better quality of life. Social media is a major tool used to recruit and deceive victims.

Of the 67 victims formally identified in 2024, 48 were trafficked for sexual exploitation. In the same year, 57% of victims identified by An Garda Síochána were Nigerian nationals and only 12 of the identified 38 Nigerian victims reported being trafficked directly to Ireland. The remainder were trafficked elsewhere and subsequently arrived in the State. Cross border movement through Northern Ireland continues to be a factor, requiring close cooperation with the Police Service of Northern Ireland.

#### Risk Groups and How They Are Addressed in National Strategy

Foreign nationals, particularly women from West Africa, are disproportionately represented among victims. Women and girls are the main group trafficked for sexual exploitation, while men are more often found in labour exploitation cases. Trafficking for forced criminality is less common, with four cases recorded in 2024.

[Ireland's Third National Action Plan to Prevent and Combat Human Trafficking \(2023–2027\)](#) (NAP) adopts a whole-of-government approach, structured around four pillars: Prevention, Protection, Prosecution, and Partnership & Policy Coordination. Specific actions to address vulnerable groups include:

- Awareness campaigns (e.g. the "[Anyone](#)" campaign with IOM) targeting both potential victims and demand.
- Legal reform, such as the [Criminal Law \(Sexual Offences\) Act 2017](#), which criminalises the purchase of sex from trafficked persons and decriminalises those selling sex.
- [Labour protections](#), including changes to the Employment Permits system to untie migrants from a single employer, reducing dependence and risk of exploitation.

- Dedicated legal and care supports via the [Legal Aid Board's Human Trafficking Legal Team](#) and the HSE Anti-Human Trafficking Team.

In addition, Ireland funds preventative work abroad. For example, a three-year €400,000 grant to ECPAT International supports anti-trafficking work across Burkina Faso, Côte d'Ivoire, Niger, and Guinea to help reduce child exploitation and cross-border trafficking.

### **Vulnerable Economic Sectors and Geographical Risk Areas**

The sectors most associated with THB in Ireland are:

- Sexual exploitation (most prevalent)
- Labour exploitation in agriculture, fishing, beauty, domestic work, hospitality, and retail
- Forced criminality (less frequent)

Sector specific interventions have been implemented. For example, following a 2022 review, the [Atypical Working Scheme for non-EEA fishers was closed](#) due to concerns about exploitation. New recruitment is now processed through the Employment Permits Scheme, which offers greater oversight and protection.

### **Coordination and Monitoring Structures**

To ensure a co-ordinated and comprehensive response to human trafficking in Ireland, the State has dedicated units within Government Departments and state agencies:

- The Criminal Justice Policy Function in the Department of Justice has both a co-ordinating and implementation role in relation to the State's response to trafficking in human beings.
- The Human Trafficking Investigation and Co-ordination Unit (HTICU) within An Garda Síochána has responsibility for policy development, the co-ordination and implementation of policing methods and the management and co-ordination of investigations within the unit and with divisions throughout the country.
- The Office of the Director of Public Prosecutions (ODPP), which is independent in the exercise of its functions, has a specific unit to deal with cases referred by An Garda Síochána with a view to initiating a prosecution.
- A specialised Human Trafficking Legal Team in the Legal Aid Board (LAB) was established in 2009 providing legal aid and advice to victims and the Anti-Human Trafficking Team in the Health Service Executive (HSE), established in 2010, provides an individual care plan for each potential or suspected victim of THB.

Beyond the functions embedded within individual departments and agencies, the Third National Action Plan to Prevent and Combat Human Trafficking (2023–2027) (the NAP) also provides for the establishment of targeted working groups focused on emerging or persistent risks in particular sectors or cohorts. This includes a Human Trafficking Oversight Group and Stakeholders' Forum, convened under the NAP. In addition, there is a Human Trafficking Labour exploitation group that has evolved from the Trafficking Oversight Group. This group provides an opportunity for stakeholders ranging from Unite the Union to Migrant Rights Centre Ireland (MRCI), the Department of Enterprise, Trade and Employment (DETE), and the Office of the Director of Public Prosecutions (ODPP) to discuss areas of concern.

**2. What specific measures are taken to reduce children’s vulnerability to THB by creating a protective environment for children? Please provide information in the following areas:**

**a. protecting children’s rights from attitudes, customs, behaviour and practices that can have an adverse effect (including child, early and forced marriage, and illegal adoption);**

Ireland has taken legal and policy steps to address harmful practices that may facilitate child trafficking.

In June 2024, [Directive \(EU\) 2024/1712](#) amending Directive 2011/36/EU was entered into force on 14 July 2024. It explicitly expands the scope of THB to include forced marriage, illegal adoption, and surrogacy-related exploitation. Ireland opted into the Directive in April 2023, and the Department of Justice is currently working on transposition, due by 15 July 2026. Ireland already criminalises forced marriage under Section 38 of the [Domestic Violence Act 2018](#), including acts committed abroad.

Raising awareness of what constitutes human trafficking is key to our [Third National Action Plan to Prevent and Combat Human Trafficking 2023- 2027](#). The [Blue Blindfold website](#) provides a user-friendly overview of how the crime of human trafficking manifests in Ireland, how members of the public can spot and report the signs of trafficking, and how the State supports these victims once identified. The Blue Blindfold website provides a list of the important signs that may indicate a person has been trafficked and this includes forced marriage.

**b. developing children’s life skills (including media literacy and online safety skills), knowledge and participation;**

Recognising that online platforms are a key tool in recruitment for trafficking, Ireland has strengthened digital literacy and safety initiatives for children:

- The Online Safety and Media Regulation (OSMR) Act 2022 established Coimisiún na Meán, the State’s online safety and media regulator, which leads public awareness campaigns and resources on children's online rights and risks.
- The Department of Education’s Digital Strategy for Schools prioritises safe and ethical technology use and supports training via [Webwise.ie](#), Ireland’s Internet Safety Awareness Centre.

Webwise, funded by the Department and the EU Internet Safety Initiative, is part of the Irish Safer Internet Centre, along with Hotline.ie, ISPCC Childline and the National Parents Council. It promotes the autonomous, effective and safe use of the internet by young people through a sustained information and awareness strategy targeting school leaders, teachers, parents and children themselves, with consistent and relevant messages. It develops and disseminates resources that help teachers integrate digital citizenship and online safety into teaching and learning in their schools. The webwise.ie resource includes a dedicated School/Teachers Hub, a Parents Hub and a Youth Hub.

### **c. putting in place a system for monitoring and reporting cases of abuse**

Ireland's child protection system includes multiple legal and operational safeguards. The identification and protection of child trafficking victims in Ireland is a key priority of our anti-trafficking efforts. This is supported both by actions in the Third National Action Plan to Prevent and Combat Human Trafficking 2023 – 2027 (the NAP), and legislation.

In the prevention pillar of the NAP, Ireland has committed to ensuring that all professionals in contact with children, and working on child related matters, are aware of the indicators of human trafficking. There is ongoing collaboration between An Garda Síochána and Tusla, our dedicated Child and Family Agency, to raise awareness of these indicators.

#### **Legislative framework**

The [Children First Act 2015](#), commenced in full on December 2017 and mandates reporting by professionals, enhances safeguarding obligations, and promotes inter-agency cooperation. These provisions operate in conjunction with the [Children First: National Guidance for the Protection and Welfare of Children \(2017\)](#). The legislation places a number of statutory obligations on specific groups of professionals and on particular organisations providing services to children. These include:

- mandatory reporting by key professionals
- improving child safeguarding arrangements in organisations providing services to children
- providing for cooperation and information-sharing between agencies when Tusla is undertaking child protection

The [Criminal Justice \(Withholding of Information on Offences against Children and Vulnerable Persons\) Act, 2012](#) and the National Vetting Bureau (Children and Vulnerable Persons) Acts, 2012 - 2016 are additional key pieces of complementary legislation designed to improve child safety and protection.

#### **International Protection Vulnerability Assessments**

As of November 2024, the International Protection Accommodation Service (IPAS) offers vulnerability assessments to all children and families seeking International Protection, in accordance with Regulation 8 of the European Communities (Reception Conditions) Regulations 2018 (S.I. 230 of 2018). Under the Regulations, IPAS is obliged to assess whether a recipient has special reception needs, and if so, the nature of those needs. This includes a person who has declared themselves a victim of trafficking.

#### **The work of Tusla, the Child and Family Agency**

Tusla has established a multiagency working group to coordinate a Tusla response to responsibilities under the NAP. In addition to Tusla professionals, the group includes An Garda Síochána, the Irish Human Rights and Equality Commission (IHREC), and MECPATHS (an NGO who provide training on awareness of child trafficking). To date, over 800 staff, from various services across Tusla (e.g. child protection, residential care staff, separated children seeking international protection) have availed of the training provided in collaboration with MECPATHS.

Tusla has also implemented a dedicated Child Sexual Exploitation (CSE) procedure since 2011. This procedure supports joint safeguarding responses with An Garda Síochána under Operation Cosnaim, for the investigation of child sexual exploitation. As of April 2025, Tusla has made 115 formal referrals to An Garda Síochána under Operation Cosnaim.

Tusla is currently developing a procedure to include the identification of potential child victims of trafficking within its data recording system, TCM (Tusla case management). The initial focus is to identify and respond to child victims of trafficking and provide the number of potential child victims and the type of trafficking suspected.

### **The work of An Garda Síochána**

Ireland has undertaken public awareness raising measures to encourage reporting of trafficking of children. In June 2024, An Garda Síochána's Human Trafficking Investigation and Co-ordination Unit (HTICU) launched a nationwide public awareness campaign, targeting trafficking for the purposes of forced begging, a form of exploitation that often involves vulnerable children. This campaign formed part of the [EMPACT Operation Global Chain](#), a co-ordinated EU wide effort. Branded "Hidden in Plain Sight", the campaign featured presentations at senior schools to raise awareness of child trafficking. The public can also report concerns and access information through the [Blue Blindfold website](#), which provides educational resources and a self-referral mechanism for victims of trafficking.

An Garda Síochána's Online Child Exploitation Unit (OnCE) is the National Central point of contact for receiving referrals in relation to Child Sexual Exploitation/Abuse Material online. Referrals are received from a number of sources which include NCMEC (National Centre for Missing and Exploited Children), Europol, Interpol, FBI and NCA (National Crime Agency). The role of the Online Child Exploitation Unit also includes the investigation and co-ordination of cases relating to the possession, distribution and production of child sexual abuse material and any related sexual abuse/exploitation of children.

The OnCE Unit also proactively investigates intelligence concerning paedophiles and their use of technology, including through the targeting of suspects for the production, distribution, and possession of child abuse images on the internet.

To encourage public reporting of any suspected child sexual abuse material online, the Department of Justice, Home Affairs and Migration and An Garda Síochána partner with [Hotline.ie](#). Hotline.ie examines all reported material and, where relevant, refers reported material to An Garda Síochána for further examination and investigation.

#### **d. providing training to childcare professionals, legal guardians, education professionals;**

Training is delivered across multiple sectors to improve identification, response, and referral of child victims:

##### **Tusla**

Tusla works with MECPATHS to train over 800 frontline staff, particularly in child protection, residential care, and services for separated children. Training is currently focused on introducing what child trafficking is and ensuring that staff are aware of the possibility of child trafficking. This training plan is managed by Tusla's national interagency working group established to co-ordinate and plan Tusla's response to suspected child victims of trafficking. More detailed workshops have been delivered to specific staff groups, such as those working with separated children seeking international protection (SCSIP) and staff working in Intake.

##### **International Protection Accommodation Service (IPAS)**

All staff working in International Protection Accommodation Services (IPAS) centres where children reside are required to complete 'Children's First Training' and are offered training from IPAS on signs and indicators of abuse. If there is a concern raised that a resident in IPAS accommodation is a potential victim of trafficking, this matter would be referred to An Garda Síochána and Tusla, as appropriate.

##### **E-Learning**

The Children First e-learning programme, developed with the Department of Children and the Health Service Executive (HSE), supports wider awareness of abuse and safeguarding obligations. The e-learning programme called 'Introduction to Children First' was developed to support people of all backgrounds and experience in recognising concerns about children and reporting such concerns if they arise. The programme takes approximately 1.5 hours to complete and covers topics including:

- Recognising and reporting child abuse;
- The role of mandated persons;
- The responsibilities of organisations working with children to safeguard children;
- The role of designated liaison persons.

##### **Education Providers**

The Department of Education's Digital Strategy for Schools supports an extensive array of training material and resources developed and provided to support teachers in online safety. Resources are also developed and disseminated that help teachers integrate digital citizenship and online safety into teaching and learning in their schools.

##### **Additional Training**

In 2024, 524 officials received anti trafficking training from An Garda Síochána's Human Trafficking Investigation Unit (HTICU) and the Organised Prostitution Investigation Unit (OPIU). An Garda Síochána provided this training, on occasion in collaboration with Ruhama, an NGO that works on a national level with women affected by prostitution and other forms of commercial sexual exploitation.

The training was delivered to international protection agencies; schools, nursing courses, doctors' courses, legal courses and crime prevention agencies, as detailed below:

- International Protection Accommodation Services: Human Trafficking Basics
- Ukrainian Migrant Refugee Centre Staff: Human Trafficking Basics
- cAPTives Anti-HT Education Programme: Human Trafficking
- Schools Transition / Senior Level: Human Trafficking Basics
- Trinity Midwives Nurses: Human Trafficking Basics and Healthcare Indicators
- Saint James Hospital, Dublin, Doctors and Nurses: Human Trafficking Basics and Healthcare Indicators
- Temple Street Hospital Nurses and Doctors: Human Trafficking Basics and Healthcare Indicators
- Kings Inns Legal Students: Human Trafficking Legislation
- Divisional Protective Services An Garda Síochána: Human Trafficking and Organised Prostitution
- Airport Police and Garda Members: Human Trafficking Indicators
- Garda Members attached to the Behavioural Detective Unit: Human Trafficking Indicators
- Crime Prevention Officers Garda Members: Human Trafficking Organised Prostitution

**e. access to education and health care for vulnerable children, including from minority groups, unaccompanied migrant children, and children of migrant workers;**

**Education**

All children in Ireland, including international protection applicants, unaccompanied minors, and children of migrant workers, are entitled to free primary and post-primary education up to age 18.

In response to the war in Ukraine, the Department of Education established a system of Regional Education and Language Teams ([REALT](#)), hosted by the 16 regional Education and Training Boards (ETBs), to support the education needs of children from Ukraine arriving in Ireland. The primary role of REALT is to assist in allocating children to school places and to support schools in meeting the needs of children as they arise. In November 2022, the remit of the REALT was expanded to include supporting the school enrolment of International Protection arrivals in addition to their original role in supporting Ukrainian Beneficiaries of Temporary Protection (BOTPs).

**Healthcare**

Access to healthcare for children of International Protection Applicants who reside in International Protection Accommodation Services (IPAS) accommodation, is mainstreamed and they can access health services through the same referral pathways as Irish citizens.

Children in the care of Tusla can also access health services through the same referral pathways as Irish citizens. A child's care plan or placement plan will outline their health care needs.

#### **f. birth registration for all children born in the country.**

All children born in the State must be registered with the Civil Registration Service under the HSE. In August 2024, the General Register Office (GRO) introduced an online birth registration system for those with a verified MyGovID account (a single account that enables the holder to access government services in Ireland).

### **3. What measures are taken in your country to address vulnerabilities related to the gender dimension of human trafficking?**

Ireland recognises that gender is a significant factor in human trafficking, particularly in cases of sexual exploitation. Based on national experience, women and girls (especially foreign nationals) are overwhelmingly the primary victims of trafficking, though men are also impacted, particularly in labour exploitation. The full extent of trafficking remains difficult to quantify due to its hidden nature.

#### **Legal and Policy Framework**

The Third National Action Plan to Prevent and Combat Human Trafficking 2023- 2027 (the NAP) undertakes to ensure supports do not discriminate on the basis of gender, age, race, disability, religion, sex, sexuality, occupation, immigration status, family status, membership of the Roma or Travelling community or status as a victim of trafficking or the type of exploitation which has been experienced. Ireland has criminalised the purchase of sexual services under the Criminal Law (Sexual Offences) Act 2017, aiming to reduce demand and disrupt the market for sexual exploitation.

#### **Healthcare services – Support and training**

The Health Service Executive (HSE) Women's Health Service provides healthcare and support, to women, cis and transgender in the sex industry. The team carry out welfare visits with the Garda National Protective Service Bureau's Organised Prostitution Investigation Coordination Unit, to promote access to health care and awareness of supports available.

The HSE Anti Human Trafficking Team supports the HSE staff and partner agencies in identifying and responding to potential victims of trafficking. When indicators of trafficking are observed, a screening tool is used, followed by a preliminary assessment. Where appropriate, and with the individual's consent, a referral is made to An Garda Síochána for formal identification that the individual is a victim of trafficking.

Under Action 1.1.6 of the Third National Action Plan to Prevent and Combat Human Trafficking, the HSE is responsible for developing a training plan for health and social care professionals and Civil Registration Service staff to support the identification of potential victims of trafficking and promote the awareness of available supports and care pathways.

To inform the development of this training, the HSE National Social Inclusion Office conducted a Training and Resource Needs Analysis in January–February 2024. A total of 602 professionals from HSE and HSE-funded services participated. Launched in December 2024, the training aims to:

- Increase awareness of human trafficking in all its forms
- Provide information on the national and international policy and legal framework

- Clarify the HSE's role under the NAP and revised National Referral Mechanism
- Promote understanding of the HSE Anti-Human Trafficking Team's support functions

To date, 634 professionals across HSE and its funded services have completed the module.

### **Gender-Specific Supported Accommodation**

In November 2023, International Protection Accommodation Service (IPAS) as part of the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) - now Department of Children, Disability and Equality (DCDE) - opened a dedicated accommodation centre for female victims of trafficking who are International Protection Applicants.

The facility provides eight beds for women who are identified as victims of trafficking, including those trafficked for the purpose of sexual exploitation. Each service user has an assigned case manager providing individualized assessment and support planning. The centre is currently operating as a pilot program. The pilot is overseen by a steering group which include representatives from DCDE; the HSE; An Garda Síochána and DePaul, an NGO.

## **4. What specific measures are taken to reduce the vulnerability to trafficking of persons from disadvantaged minorities? Please provide information on policies and measures in the following areas:**

### **a. research;**

Insights on vulnerabilities among minority and migrant communities are attained from frontline operational actors such as An Garda Síochána, Tusla, IPAS, and NGO partners. These insights are shared through the Human Trafficking Stakeholders' Forum and Tusla's multi-agency working groups, which provides a structured space for engagement across sectors.

The Government also provides funding to civil society organisations and NGOs, including RUHAMA, the International Organization for Migration (IOM), and the Migrant Rights Centre Ireland (MRCI), who have undertaken research and analysis on vulnerabilities to trafficking among disadvantaged and minority populations. This research, alongside operational insight, contributes to the national understanding of risk factors and informs policy and service responses.

### **b. information, awareness-raising and education campaigns;**

A wide range of State-led and NGO-supported awareness and education initiatives have been implemented to raise public understanding of human trafficking and support the identification of victims, including those from disadvantaged and minority communities.

#### **National Campaigns**

The [Blue Blindfold website](#) provides accessible information on how trafficking manifests in Ireland, how to recognise potential victims, and how to report concerns. It is designed for broad public use and includes information relevant to both sexual and labour exploitation.

Under the Third National Action Plan to Prevent and Combat Human Trafficking 2023–2027, targeted awareness actions have been implemented, including collaboration with the International Organization for Migration (IOM) on the multilingual “[Anyone](#)” campaign. This initiative focuses on the concept of trafficking being “hidden in plain sight” and includes videos and outreach in transport hubs and on social media, available in multiple languages via [anyonetrafficked.com](http://anyonetrafficked.com).

### **Child Specific Education and Awareness**

The Department of Education’s Digital Strategy for Schools, along with the Webwise programme, promotes online safety and digital literacy for young people. Webwise delivers training materials and awareness resources for schools, parents, and children, contributing to prevention efforts related to grooming and online recruitment for trafficking.

Tusla collaborates with MECPATHS (an NGO focused on child trafficking) to deliver staff training and awareness in residential care settings. The training introduces trafficking indicators and focuses on identification, assessment, and response.

There is ongoing interagency collaboration between Tusla and An Garda Síochána to raise awareness among child protection professionals, including joint planning, training, and child-specific safeguarding actions.

### **Health Focused Awareness**

As part of a joint initiative, the HSE Women’s Health Service and the HSE Anti-Human Trafficking Team are participating in an awareness-raising campaign on human trafficking and sexual exploitation, in collaboration with the Garda National Protective Services Bureau, Ruhama, IOM, and the Border Management Unit. The first activation took place on 22 May 2025 at Dublin airport.

### **Law Enforcement Campaigns**

#### EMPACT Operational Days of Action – Global Chain

In June 2024, The Human Trafficking Investigation and Co-ordination Unit (HTICU) led a nationwide public awareness campaign as part of Operation Global Chain, a Europe wide EMPACT initiative. The focus was in targeting trafficking for the purposes of forced begging. This is often an area where vulnerable people including children are exploited.

From June 3 - 9, 2024, the campaign aimed to raise awareness of the indicators of trafficking and the potential identification of victims. The HTICU engaged Divisions across Ireland to identify and collate details of persons engaged in begging and to identify any potential victims of forced begging and provide them with information on the supports available. Key features of the campaign included:

- the distribution of a credit card sized information card with emergency and anonymous contact details to report suspected trafficking
- 16 inspections across Ireland
- HTICU members supported by the Garda National Immigration Bureau (GNIB) members monitored flights and provided a visible presence at airports, seaports and train stations in the state.
- Welfare visits carried out by the Organised Prostitution Investigation Unit (OPIU)

This was an inter-agency operation involving the Garda National Protective Services Bureau, the Garda National Immigration Bureau, the Workplace Relations Commission (WRC), the Revenue Commissioners and the Department of Social Protection.

#### Awareness campaign at Ploughing Championships

In September 2024, the Human Trafficking Investigation and Co-ordination Unit (HTICU) together with members from the Organised Prostitution Investigation Unit (OPIU) were present at this year's National Ploughing Championships in Co. Laois. The HTICU had been invited by the Department of Justice to have a stand within the Victims Journey Marquee. The National Ploughing Championships is Europe's leading outdoor agricultural trade exhibition and in 2024 almost a quarter of a million people attended. An Garda Síochána also attended the Ploughing Championship in 2023 and 2022.

At the National Ploughing Championships in 2024, An Garda Síochána launched a new impactful marketing campaign, "Hidden in Plain Sight". Members from The Human Trafficking Investigation and Co-ordination Unit (HTICU) and Organised Prostitution Investigation Unit (OPIU) engaged with members of the public to raise awareness of Human Trafficking and how this crime is often hidden in plain view. Below are the images of the banners used:



#### Global Week of Action: Operation Liberterra II – September 2024

Ireland also participated in Operation Liberterra II, a global week of action from the 29 September to the 4 October 2024, tackling both Human Trafficking and Migrant Smuggling. The main aim of this operation was to identify and dismantle criminal organisations involved in the smuggling of migrants, the trafficking in human beings, and other related crimes and also ensure that assistance be provided to the victims of trafficking and migrants in vulnerable situations.

Members of the GNIB and HTICU were overtly present at Dublin Airport and conducted document checkpoints. A total of 120 flights were monitored and 16,472 people checked during the week. Two people were arrested and charged with migrant smuggling.

#### Santa Marta Leadership Summit Cork 26th – 27th June 2024

On the 26 and 27 June 2024, Ireland hosted the Santa Marta Senior Leadership Summit on collectively combating human trafficking at University College Cork conference centre in Cork City. The two-day event was jointly hosted by An Garda Síochána and the Santa Marta Group.

The Santa Marta Group was established in 2014, under the patronage of Pope Francis, to, ‘act as a catalyst to bring systemic change to end human trafficking, together with law enforcement, civil society and the Church.’ The focus of the event is to highlight a unified commitment to identifying and supporting victims of Human Trafficking along with identifying methods to disrupt, dismantle and prosecute the Organised Crime Groups involved in these crimes.

The summit was attended by Minister for Justice, Helen McEntee TD, Garda Commissioner Drew Harris, Chief Constable of the PSNI Jon Boutcher and Cardinal Vincent Nichols, President of the Santa Marta Group, MEP Frances Fitzgerald and Director James C. Harris III of the Department of Homeland Security’s Centre for Countering Human Trafficking (HSI) in the United States of America. In addition to Cardinal Vincent Nichols, the Santa Marta group were represented by a number of their executive board including Sir Iain Livingstone (former Chief Constable of Police Scotland), Ms Donna Edwards, first lady of Louisiana (USA) and her husband outgoing Governor of Louisiana, Mr John Bel Edwards amongst other distinguished guests.

In addition, International Police Services including the Metropolitan Police, the PSNI, West Midlands Police (WMP), Greater Manchester Police (GMP), Police Scotland and the Lithuanian Police were also in attendance. Representatives from the Catholic Church, NGOs such as Ruhama and Mecpaths, charitable partners and other stakeholders from the Workplace Relations Commission and Department of Justice officials working to combat human trafficking locally and internationally also attended the event.

The summit centred around the theme Human Trafficking being ‘Hidden in Plain Sight’ in our communities and centred around four themed presentations followed by a panel discussion moderated by Mr. Enda Brady formerly of Sky News in the U.K. The four themes discussed were:

- Victim Survivor Story
- Sexual Exploitation Investigation
- Labour Exploitation Investigation
- Forced Criminality

The event resulted in positive feedback and a commitment to continue with the important work to combat Human Trafficking in all its forms.

### **c. socio-economic initiatives targeting underlying and structural causes;**

Ireland recognises that one of the underlying causes of human trafficking is a lack of awareness of how traffickers operate and how they exploit vulnerable people.

In 2022 the Department of Foreign Affairs awarded a grant amounting to €400,000 over three years to Every Child Protected Against Trafficking (ECPAT) International. The funding supports a project aimed at increasing the protection of children against the changing nature of threats related to sexual exploitation in four pilot countries in West Africa - Burkina Faso, Cote d’Ivoire, Niger and Guinea. These countries share a border and are known routes for cross border child trafficking.

This initiative reflects Ireland's recognition that supporting local resilience and reducing socio-economic vulnerability abroad contributes to tackling the root causes of trafficking at source.

In addition, Irish Aid, the Irish Government's Overseas Development Programme, funds initiatives that build the capacity of vulnerable groups to address the factors that can make them vulnerable to human trafficking.

Ireland's Defence Forces play a role in international peacekeeping and the National Action Plan to Prevent and Combat Human Trafficking recognises that, where appropriate, training in anti-trafficking measures should continue to be provided to those who serve in these roles abroad.

#### **d. education, vocational training and job placement programmes**

A key aspect of any response to combating trafficking is to seek to reduce the vulnerability of groups who are considered at risk of trafficking. We recognise that these vulnerable groups include individuals impacted by prostitution, undocumented migrants and unaccompanied children.

##### **Access to Primary and Post Primary Education**

In Ireland, all migrant children, including children of international protection applicants, children of migrant workers and unaccompanied minors, can access primary and post-primary education in a manner similar to Irish nationals, until they have reached 18 years of age.

##### **Further Education and Training (FET)**

Ireland has a programme for Further Education and Training (FET) for adults. There are a range of supports available for learners in FET. These include courses being free or heavily subsidised, financial supports, training allowances, and adult education guidance support and supports for learners with additional needs.

FET includes both labour market focused programmes and programmes with a strong social inclusion dimension. The programmes are available on both a full and part-time basis, including evenings and weekends, as well as blended and online options, which in turn suits the lives of learners of all ages and from all backgrounds. FET is available in every community in Ireland through the local Education and Training Board (ETB). ETBs also have Adult Education Guidance Services which offer free, impartial adult education information to help people make informed educational, career and life choices.

In order to assist victims of trafficking and prevent them from being re-trafficked, supports are also available to them where the eligibility criteria are met. Victims of trafficking who are not citizens of Ireland, Switzerland, The United Kingdom, or a European Economic Area (EEA) member state can access free adult literacy or English for Speakers of Other Languages (ESOL) through their local ETB. Victims of trafficking who are in the International Protection system and have received a Labour Market Access Permission Letter from the Department of Justice, Home Affairs and Migration can access FET once they meet standard programme eligibility criteria. Victims of trafficking with refugee or subsidiary protection status can access FET and related supports (e.g., Training Allowances, Student Universal Support Ireland (SUSI) grants) on the same basis as Irish citizens.

Since 2021, victims of trafficking who are awaiting the outcome of an International Protection application and are on a post-leaving certificate (PLC) course no longer need to pay the international fee. They can also apply for financial support through the International Protection Student Scheme (for Further Education /Higher Education Students) 2024/2025 if they have been resident in the State for a continuous period of three years or more.

**5. What specific measures are taken to reduce the vulnerability to THB of persons with disabilities? Please provide information in the following areas:**

**a. deinstitutionalisation, including community and family-based services for children and support for independent living;**

Persons with disabilities may face increased risk of trafficking due to factors such as social isolation, reliance on carers, and residence in institutional settings with limited external oversight. Ireland recognises these risks and has implemented a range of measures to reduce the vulnerability of persons with disabilities, in line with its obligations under the UN Convention on the Rights of Persons with Disabilities (CRPD) and national frameworks such as the National Disability Inclusion Strategy.

The Health Information and Quality Authority (HIQA) is the independent authority established to drive continuous improvement in Ireland's health and personal social care services, monitor the safety and quality of these services and promote person-centred care for the benefit of the public.

Ireland's framework is further strengthened by the role of the Irish Human Rights and Equality Commission (IHREC), which serves as the independent monitoring body under Article 33 of the CRPD. IHREC monitors State compliance with disability rights obligations and has highlighted how institutionalisation, segregation, and lack of access to community-based supports can increase vulnerability to abuse and exploitation, including trafficking. IHREC continues to advocate for stronger accountability, inclusive service design, and investment in supports that promote autonomy and independent living.

**Children**

All children in the care of Tusla, the child and family agency, are subject to child-in-care regulations, both in foster care and residential care. The Child Care Act 1991 and 1995 Regulations set out clear statutory obligations on Tusla to take specific measures to ensure the welfare of the child is paramount. These include:

- the allocation of an authorised worker to oversee the placement of the child and ensure that the needs of the child are met in placement
- statutory visits to the child in placement
- statutory planning meetings - Child in Care Reviews

When children come into Tusla's care, an assessment of needs is completed by a social worker. This assessment supports decision making regarding whether an alternative care placement best meets the needs of a child. Alternative care placements are governed by the Child Care Act 1991 and subsequently the Placement of Children in Foster Care Regulations, 1995, the Placement of Children with Relative Regulations, 1995 and the Placement of Children in Residential Care Regulations, 1995. These placements can include disability services, psychiatric services, supported lodgings etc.

In 2024, 543 children (9.3% of all children in care) were placed in residential care including 13 in special care and 203 in other care placements. The majority of children in the care of Tusla are in foster placements with foster families. At the end of 2024, 5823 children were in care, of those 5077 were placed in family-type care, referred to as foster care. Of the 5077 children living in foster care 1,516 were living with relatives, referred to as relative foster care.

This strong emphasis on family-based placements reflects a national policy of deinstitutionalisation, reducing the isolation and systemic vulnerabilities that traffickers may exploit.

## **b. monitoring institutions and foster families accommodating persons with disabilities;**

### **Designated centres for adults and children with a disability**

The Health Information and Quality Authority (HIQA) disability inspection team is legally responsible for the monitoring, inspection, and registration of designated centres for adults and children with a disability.

Any person with a disability living in a designated centre is afforded protection with the care and welfare regulations 'S.I. No. 367/2013 - Health Act 2007 (Care and Support of Residents in Designated Centres for Persons (Children and Adults) with Disabilities) Regulations 2013. A provider is also obligated to have a Resident's Guide in place which, again, would signpost the Provider's Complaints Management Process. The Health Service Executive (HSE) has a national policy '[your service your say](#)' which can be used to register complaints or concerns. In centres where the quality of support is insufficient or inadequate, inspection and monitoring of centres by inspectors ensures that providers are required to take action to rectify issues in relation to the safety and quality of life for people with disabilities by means of a regulatory programme.

The legal framework for the provision of residential care services in Tusla does not encompass the registration and inspection of disability services. Residential disability services are provided by the HSE and are governed by a different legal framework. Where children in care with disabilities are placed in a HSE disability service they remain subject to the 1995 Regulations and their allocated worker will undertake statutory visits and child in care reviews to ensure that their needs are being met in their placement.

### **Foster Families**

The Child Care Act 1991 also sets out a legal obligation on the Agency to assess and approve potential foster carers. This is further supported by the National Standards for Foster Care, 2023 which sets out clear criteria for assessment, approval, support and supervision of potential foster carers and approved foster carers. This includes a requirement to have a dedicated worker, assigned to the foster carers, who undertake home visits and provide supervision and support to the foster carers.

Tusla monitor fostering services at local level, with the provision of dedicated workers both for children in care and foster carers, and at a national level through regular auditing by Tusla's internal inspection service. These provide Tusla staff and managers at area and regional levels with reports on safeguarding, compliance matters, in line with the National Standards for Foster Care.

Fostering services are also audited and monitored independently of Tusla by HIQA. Residential Care Services are also monitored and audited internally by Tusla. In this process the National Standards for Residential Care report on practices in centres and make recommendations on areas requiring action. Residential care services are also monitored independently of Tusla by HIQA.

### **c. procedure for the selection and appointment of legal guardians and monitoring of their work;**

Tusla endeavours to ensure that all children in their care have an allocated worker to oversee their care and placement plan. A social worker is responsible for the care arrangements for the child as well as for working with the child's family. The appointment of a legal guardian will depend on the circumstances under which the child is admitted into care:

- When a child is admitted into care by voluntary agreement, the legal guardians are the child's parents
- When a child is admitted into care subject to a full care order (Order of the District Court), Tusla are the legal guardians for the child

As legal guardianship is appointed by the courts, any persons wishing to become a legal guardian of a child in care must apply for guardianship through the courts.

#### **Legal Guardians for unaccompanied children**

Tusla is responsible for appointing legal guardians to unaccompanied children. Tusla assumes the role of the guardian but is not the legal guardian of the child unless they are subject to a Full Care Order (decision made by the District Courts). Children without a legal guardian are placed in the care of an appropriate state agency (foster family) with an assigned social worker who is specifically trained to assist and support child victims of trafficking. A statutory care plan is developed and, if appropriate, an application for International Protection will be made on behalf of the child. The Court has the power to appoint a legal guardian to act for the child who can establish the wishes and feelings of the child. Tusla provides child trafficking training to its staff and funded residential care staff and some foster carers have received this training.

#### **Guardian ad Litem**

A Guardian ad Litem is responsible for representing the wishes, feelings and interests of the child to court. Guardians Ad Litem are appointed by judges in child-care proceedings under Section 26 of the Child Care Act, 1991. The role and function of a Guardian ad litem is to inform the court of the child's views and to advise the court of what, in the Guardian Ad Litem (GAL)'s professional opinion, is in the best interests of the child.

The Child Care Act 1991 Act obliges Tusla, the Child and Family Agency to pay costs (fees, travel, and legal representation) incurred by Guardians ad litem in the performance of their functions but does not prescribe any role, function or qualification for the GAL. The role of the GAL is outlined in [Tusla Court Report Best Guidance document](#) and includes:

- bringing to the attention of the HSE any risks which he or she believes may adversely affect the best interests of the child, and if not satisfied with the response may bring the matter to the attention of

the Court. The GAL should take steps where necessary to cooperate with, and where possible share relevant information with, other care professionals engaged with the minor.

- Where a minor has absconded from special care and the GAL is aware of this, the GAL should be satisfied that steps are being taken to address the problem. If the issue persists, then the GAL should take steps to inform the Court of the minor's absence, having first informed the HSE that they are about to do so.

#### **d. access to adequate accommodation, education and work;**

The Health Information and Quality Authority (HIQA) disability inspection team is legally responsible for the monitoring, inspection, and registration of designated centres for adults and children with a disability. In centres where the quality of support is insufficient or inadequate, inspection and monitoring of centres by inspectors ensures that providers are required to take action to rectify issues in relation to the safety and quality of life for people with disabilities by means of a regulatory programme. Any person residing in a designated centre for people with disabilities as inspected by HIQA, is entitled to a complaints process, information and support for their communications needs.

Victims of trafficking including those with disabilities are provided with accommodation by International Protection Accommodation Service (IPAS), as part of the Department of Justice, Home Affairs and Migration. Currently all victims of trafficking who require accommodation via the National Referral Mechanism are referred to IPAS. In addition to the online resources available to IPAS residents, centre staff and management are available to assist residents through the signposting of services and supports available to them. Additionally, residents can contact the Helpdesk to request transfers on medical grounds. These queries are assessed through the Medical Transfer Protocol and decisions are made in consultation with an independent medical referee. However, offers of accommodation can only be made within the available IPAS portfolio.

IPAS have continued ongoing engagement with the Health Service Executive (HSE) National Social Inclusion Office and the HSE Anti Human trafficking team regarding the access to health services including psychological assistance to those who reside in IPAS accommodation.

#### **Victims of Trafficking with Disabilities**

It is recognised that victims of trafficking are at risk of being re-trafficked. If the Health Service Executive Woman's Health Service/Anti Human Trafficking Team (AHTT) identify or suspects that a person has a disability, the psychologist is consulted. Where possible, an initial screening takes place to determine the level of need and an onward referral for full assessment is undertaken. Informed consent is sought from the person. In this case, all information is made available to the person in an accessible format (clear language, use of visual / picture cues). The identification of any specific need forms part of the care plan for the person and will be notified to any services that may be supporting the person.

### **e. access to information and reporting/complaints mechanisms which are accessible to persons with disabilities.**

To reduce the vulnerability of persons with disabilities to trafficking and human exploitation measures are taken by An Garda Síochána, including increased monitoring, accessible communication, and specialized training for members. These measures aim to safeguard individuals, promote their rights, and ensure their safety and well-being.

An Garda Síochána is committed to providing accessible information and reporting/complaints mechanisms for persons with disabilities. This is in line with Criminal Justice (Victims of Crime) Act 2017, and S.I. No. 358/2020 - European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies). Measures taken by An Garda Síochána includes ensuring that website and other communication channels are accessible, offering alternative formats for information, and having dedicated access officers to assist with queries and complaints related to accessibility.

An Garda Síochána's Victim Information booklet is translated into 39 different languages including Ukrainian. Audio and Braille copies of the Victim Information booklet are also available. The victim information booklet sets out the rights of all victims of crime in Ireland and is contained under the Criminal Justice (Victims of Crime) Act 2017. All victims including those with disabilities are treated equally.

#### **Reporting/Complaints mechanisms**

The Health Service Executive (HSE) has a process to listen and respond to feedback about their services. This process is called '[Your Service Your Say](#)'. The HSE vision for this process is to ensure that the fundamental right for people to voice opinions, provide comment, and to complain, is to the fore, with the focus on creating a positive environment and culture to encourage and learn from feedback.

In cases where a person with disabilities is unable to make a complaint, the complaint may be made on that person's behalf by:

- A close relative or carer of the person
- Any person who, by law or by appointment of a court, has the care of the affairs of that person
- Any legal representative of the person
- Any other person with the consent of the person, or
- Any other person who is appointed as prescribed in the regulations

Information on how to make a complaint or provide feedback regarding a service can be obtained found at <https://www.hse.ie/eng/about/who/complaints/ysysguidance/supporting-the-service-user/complaint.html>. Complaints can also be made to the Ombudsman [Ombudsman.ie - Make a Complaint about Health or Social Services](#)

Victims of trafficking, including those with disabilities who are provided with accommodation by the International Protection Accommodation Service have access to clear complaints procedure set out in the house rules booklet that is provided to every resident. In cases where residents feel that complaints have not adequately been dealt with locally, they can contact IPAS directly via the Helpdesk ([ipasinbox@equality.gov.ie](mailto:ipasinbox@equality.gov.ie)).

**6. How do you ensure in practice that an assessment of the vulnerability and special needs of asylum seekers is carried out at an early stage? What procedures are followed when vulnerability to THB is detected? Please provide information on policies and measures in the following areas:**

**a. provision of comprehensive and accessible information, in a range of relevant languages, on the rights of asylum seekers, indicators of THB, rights of victims of THB, and contacts of relevant organisations;**

Ireland has taken a number of steps to ensure that asylum seekers are provided with comprehensive, accessible, and multilingual information at an early stage of the international protection process. These measures are aimed at supporting informed engagement with the system, promoting early identification of vulnerability (including to human trafficking) and directing applicants to appropriate assistance.

**Information on Rights and Supports Services**

Upon arrival and registration with the International Protection Office (IPO), all applicants are provided with an information booklet explaining the asylum process, their rights and entitlements and access to services. This includes details on:

- The purpose and steps of the International Protection Process
- Rights and entitlements, including reception conditions, access to legal aid and healthcare
- Access to interpretation and translation
- The right to confidentiality and protection of personal data.

This booklet ([Information booklet for new applicants](#)) IPO is available in 21 languages. While the IPO booklet does not include trafficking indicators per se, additional trafficking related information is made available through:

- NGO outreach (e.g. Ruhama, MRCI, [DORAS](#), [IHREC](#))
- The Blue Blindfold website which contains multilingual resources and clear guidance on self-referral and support for potential victims of trafficking

**b. access to legal assistance and representation.**

Access to legal assistance is a key safeguard for applicants in the International Protection process

The Legal Aid Board provides staff training on trafficking indicators. This enables staff who come into contact with applicants for International Protection to identify at an early stage if the applicant has been trafficked.

If staff suspect an applicant has been trafficked, they can refer the client to the Human Trafficking Unit at the Legal Aid Board. A dedicated solicitor in the human trafficking unit is assigned a caseload of International Protection cases which involve elements of trafficking. Other solicitors and caseworkers in the wider team who have extensive experience in dealing with clients who have been trafficked also work with International Protection applications.

### **c. access to decent accommodation, health (including psychological) care, work and education.**

The remit of the International Protection Accommodation Service (IPAS), as part of the Department of Justice, Migration and Home Affairs, is to provide accommodation for International Protection Applicants. This may include victims of trafficking.

All families who make an application for International Protection and require IPAS International Protection Accommodation Service (IPAS) accommodation are offered a vulnerability assessment on the day of application, in accordance with Regulation 8 of the European Communities (Reception Conditions) Regulations 2018 (S.I. 230 of 2018). Under the Regulations, IPAS is obliged to assess — (i) whether a recipient is a recipient with special reception needs, and (ii) if so, the nature of his or her special reception needs. All single men who make an application for international protection are offered a vulnerability triage on the day they make an application.

Health Service Executive (HSE) Social Inclusion have a social work team in the medical centre in IPAS's main reception centre, Baleskin. This team accept referrals from the IPAS Resident and Welfare Team when vulnerability to human trafficking has it has been identified that the applicant has been trafficked. A Health Service Executive staff member is co-located with the National Social Inclusion Office (NSIO) and Resident Welfare Team in IPAS to assist in addressing cases where IP applicants have complex medical needs and provides support and guidance to IPAS as required where a priority medical condition is identified. All International Protection applicants who are identified as potential victims of trafficking are offered accommodation by IPAS. This accommodation is subject to ongoing internal review and oversight by IPAS to maintain standards. The European Communities (Reception Conditions) (Amendment) Regulations 2023 give the Health Information and Quality Authority (HIQA) the powers to monitor and inspect permanent international protection accommodation centres. HIQA monitors the quality of IPAS centres by inspecting permanent IPAS centres against the National Standards. All HIQAs inspection reports are published on [www.hiqa.ie](http://www.hiqa.ie).

Applicants who reside in IPAS accommodation are entitled to a range of supports and services including accommodation, food and meals, a weekly social welfare payment, access to health care, access to education, legal assistance, social supports. International Protection Applicants can apply for permission to access the labour market after six months and once granted can access public employment services via Intreo such as job seeking support and job matching. Children aged 4-18 living in IPAS accommodation are entitled to free primary and post primary education provided by the State. International Protection Applicants over 16 years of age are eligible to apply to a wide range of Further Education and Training (FET) courses, subject to availability.

#### **Gender specific accommodation**

While the housing situation in Ireland is quite challenging at present, actions under the National Action Plan to Prevent and Combat Human Trafficking 2023 - 2027 link to the commitment under the Third National Strategy on Domestic, Sexual and Gender Based Violence to provide gender-specific accommodation for trafficked women.

Ireland is committed to establishing gender-specific accommodation with associated support structures for victims of trafficking for sexual exploitation. In November 2023, a specialised accommodation centre (Rosa's Place) opened for referrals of female victims of trafficking who are also applicants for International Protection. In 2024 this operated as a pilot programme. It is an 8-bed accommodation unit, providing specialist, individualised support for women who are identified as victims of trafficking, including those trafficked for the purpose of sexual exploitation.

In addition to the supports provided by the Health Service Executive Anti Human Trafficking Team, each service user has an assigned case worker providing individualised assessment and psychosocial supports. Residents of Rosa's Place highlight the benefit of own room accommodation and the location of the service. The centre is currently operating as a pilot program overseen by a steering group which include representatives from the International Protection Accommodation Service; the HSE; An Garda Síochána and the DePaul Trust. An evaluation of this pilot is planned for 2025. Further to that evaluation IPAS will make a determination on future service models for victims of trafficking who are also applicants for International Protection.

International Protection applicants who are eligible for accommodation via IPAS, who do not meet the criteria for Rosa's Place are accommodated within the broader IPAS accommodation network. Accommodation is assigned to best meet the needs of individuals within the network, depending on availability at the time, particularly where the victim of trafficking is recovering from sexual violence.

**7. What specific measures are taken to reduce the vulnerability to THB of migrant workers (including seasonal workers, seconded/posted workers, domestic workers, diplomatic household employees)? Please provide information on policies and measures in the following areas:**

**b. provision of comprehensive and accessible information, in a range of relevant languages, on migration and labour laws, worker protection and contacts of relevant organisations;**

The Department of Justice and Home Affairs maintains a dedicated website, [Coming To work in Ireland](#) which outlines various routes to living and working in Ireland and the associated permissions

The [Workplace Relations Commission](#) (WRC), an independent, statutory body established on 1<sup>st</sup> October 2015 under the Workplace Relations Act 2015 (No. 16 of 2015) provides further information on migration and labour laws. The WRC's core services include the inspection of employment rights compliance, the provision of information, the processing of employment agency and protection of young persons (employment) licences and the provision of mediation, conciliation, facilitation and advisory services. The WRC also operate a dedicated Information and Customer Services line to support both employers and employees on their rights and entitlements under employment and employment permits law. In 2024, the WRC provided information on employment rights to almost 60,000 telephone callers. In addition, over 1.5 million users visited the WRC website. Additionally, the WRC conducts outreach activities and made 51 presentations and information sessions on employment rights to relevant groups. This outreach informs and

assists WRC service users, the public, employers and employees of the rights and obligations provided under employment and employment permits law.

The WRC website provides a comprehensive range of information on employment rights and redress options. Specific vulnerable groups (including fishers, seasonal workers, posted workers and domestic workers) have bespoke information relevant to their sector and this is available in the predominate languages of the workers in these sectors.

The availability and dissemination of knowledge and information about individual's employment rights reduce opportunities for exploitation and expose non-compliant employers. The WRC will continue to work with all stakeholder groups in terms of providing information and supports to prevent labour exploitation.

### **c. provision of clear employment contracts;**

The [Workplace Relations Commission](#) (WRC) provides extensive information via its website and online publications for employers and employees in relation to rights and obligations under the Terms of Employment (Information) Act 1994.

This Act requires employers to provide employees with a written statement of certain particulars of their employees' terms of employment and provides a right of complaint to the WRC where an employee believes that their employer has failed to provide such a written statement or failed to notify the employee of changes to the particulars contained in the statement.

Foreign nationals working legally in Ireland are entitled to the full range of statutory employment rights and protections in exactly the same manner as an Irish worker.

### **c. access to decent work and housing, health care, social services and education;**

A migrant worker's access to work, housing, health care, social services and education are dependent on their permission type; their nationality (whether they are EU/EEA/UK citizens or not) and how long they have been residing and working in the State. For example, people in Ireland on a student visa in Ireland may work for up to 20 hours a week – with 40 hours a week possible over the Christmas/New Year period and during the summer break.

Health Service Executive's National Social Inclusion Office has a webpage aimed at migrants - [About the Irish Health System: A guide for refugees and other migrants - HSE.ie](#) - outlining their entitlements.

### **d. possibility to change employers;**

The Employment Permits Act 2024 provides a simplified process enabling permit holders to change employers after a prescribed period has passed from the start of their first employment in the State. This period is currently prescribed as 9 months. The provision allows these permit holders to transfer employer without the requirement to apply for a new employment permit and without the need for a Labour Market

Needs Test. This strengthens the rights and working conditions of employment permit holders in the State and encourages employers to provide adequate terms and conditions.

Exceptions to the 9-month timeframe are considered by the Department of Enterprise, Trade and Employment on a case-by-case basis where the permit holder may have experienced employment rights violations.

**e. access to confidential complaints mechanisms;**

Complaints in relation to alleged contraventions of employment and equality legislation may be presented to the Workplace Relations Commission (WRC). The relevant complaint form is available on [www.workplacerelations.ie](http://www.workplacerelations.ie) or by contacting the Commission's Information and Customer Services on 0818 80 80 90. Depending on the nature of the complaint, the matter will be referred for either investigation or adjudication. There is a right of appeal by either party to the Labour Court from a decision of a WRC Adjudication Officer.

**f. right to join trade unions and to engage in collective bargaining;**

In Ireland, Migrant workers, regardless of immigration or visa status, have the legal right to join a trade union in Ireland.

**g. legal avenues for regularising their stay in the country**

**Reactivation Employment Permit Scheme**

The Reactivation Employment Permit Scheme (REP), operational since 2014 is designed for non-EEA nationals who previously held an employment permit but lost their legal status involuntarily. Applicants must have held an employment permit in Ireland and must have lost immigration or work status through no fault of their own. This scheme offers a pathway to status for individuals recovering from labour exploitation or trafficking, allowing them to legitimise their presence and work legally, especially where prior permits were withheld or revoked. Support organisations such as the Migrant Rights Centre Ireland (MRCI) continue to refer clients and assist with REP applications. The Reactivation Employment Permit is less restrictive in that the income threshold is minimum wage and there are no ineligible jobs.

**Regularisation of Long-term Undocumented Migrants Scheme (2022)**

Ireland also implemented a once-off regularisation scheme for long-term undocumented residents, which ran from 31 January to 31 July 2022. Successful applicants received Stamp 4 permissions valid for two years, granting unrestricted access to the labour market, rights to renew the status, and eligibility to count residence towards naturalisation.

As of February 2025, 8,284 decisions have been issued to applicants of the scheme, of which 6,519 are positive decisions, 1,645 are negative decisions, and 120 applications have been withdrawn by the applicants for various reasons.

The scheme was developed following a consultation process with key stakeholders including NGOs that work directly with people and families who are in vulnerable immigration-related circumstances, as well as inter-Departmental and operational stakeholders.

**8. Do labour inspectorates and other authorities checking workplace conditions possess a comprehensive mandate, and adequate human, financial and technical resources, to conduct regular, proactive workplace inspections in all economic sectors, with a particular emphasis on high-risk sectors prone to exploitation? How do labour inspectors co-operate with other authorities and trade unions? Is there a separation between labour inspection and immigration control functions?**

**Role and mandate of Workplace Relations Commission (WRC) Inspection and Enforcement Services**

The WRC's Inspection and Enforcement Services promote, encourage and enforce compliance with a range of employment and employment permits legislation. Workplace inspections to ensure employers' compliance with employment law in the State. The majority of inspection cases concluded by the WRC are based on risk assessments including high risk sectors which are susceptible to labour exploitation. These inspections are carried out by appointment but can also be unannounced. Inspectors are legally entitled to enter any workplace to carry out their work and obstruction or providing misleading information to an Inspector is a criminal offence.

**Risk based inspections**

Inspection activity, in general, is focused on sectors where a risk of non-compliance has been identified or where previous non-compliance has been detected. Potential non-compliance is identified through the gathering of intelligence and information provided by other bodies or persons (including other State bodies) or in response to specific complaints received regarding alleged non-compliance by specific employers.

**Inspections during EMPACT Joint Action Days**

The WRC actively participates in dedicated campaigns to detect and combat labour exploitation including EMPACT Joint Action Days (JAD's) focused on labour exploitation and human trafficking, which involves labour inspectorates and police forces across Europe.

**Staffing Resources**

Currently the WRC has 70 inspector posts (including 8 Inspection Team Managers) organized in five regional offices across Ireland. Sanction has been obtained for 10 additional inspector posts and a recruitment campaign for inspectors is currently ongoing. This will bring the total allocation to 80 posts.

**Training in Trafficking in Human Beings**

Training in the identification of the indicators of THB has been provided to all current inspectors, and. The WRC also regularly updates Inspectors on trends and new developments relating to labour exploitation.

**Cooperation with other statutory enforcement authorities**

The WRC Inspectorate has wide ranging powers to exchange information with other State bodies and carries out inspections with other State enforcement bodies where such joint operations would enhance the

effectiveness of the participating bodies. The WRC regularly conducts joint inspections with other statutory authorities such as An Garda Síochána (including the Human Trafficking Investigation and Coordination Unit), Revenue and the Department of Social Protection.

#### **Separation between WRC inspectorate and immigration control functions**

The WRC is satisfied that there are sufficient firewalls in place in terms of any joint inspection activity that it carries out in conjunction with the State's immigration enforcement authorities (namely, the Garda National Immigration Bureau). The WRC implements a policy of not initiating prosecutions against an employee when detected working without a valid employment permit. In such circumstances, any prosecution proceedings are initiated against the employer only.

The WRC is also a partner in the State's response to THB and has been designated as a Competent Authority under the revised National Referral Mechanism (NRM) and a member of the NRM Operational Committee. The WRC also participates in the Human Trafficking Oversight Group, the Human Trafficking Governance and Strategy Group and the Human Trafficking Stakeholders Forum. All three groups were established in 2024 by the Department of Justice to support the practical implementation of the Third National Action Plan to Prevent and Combat Human Trafficking 2023 – 2027. In addition, the WRC participates in the Labour Exploitation Subgroup, a subgroup derived from the membership of the Oversight Group mentioned above.

### **9. How are employment and recruitment agencies regulated and monitored? Are all stages of the recruitment process, including advertisements, selection, transport, and placement, subject to regulation? Are recruitment fees and related costs prohibited from being borne by workers or jobseekers?**

Under Irish law, the Employment Agency Act 1971 provides for the control and regulation of employment agencies. The definition of an "employment agency" in the 1971 Act includes an employment agency within the meaning of the Protection of Employees (Temporary Agency Work) Act 2012. The 1971 Act provides that any person carrying on the business of an employment agency must obtain a licence to do so from the Minister for Enterprise, Trade and Employment. It is an offence under the 1971 Act for an employment agency to carry on business in Ireland without an employment agency licence. Under section 10(1) of the 1971 Act, a person guilty of an offence under the Act shall be liable on summary conviction to a Class C fine not exceeding €2,500 and in the case of a continuing offence to a further Class D fine not exceeding €1,000 a day.

Applications for employment agency licences are received and processed, on behalf of the Minister for Enterprise, Trade and Employment, by the Workplace Relations Commission (WRC). Before an employment agency can be registered the person involved must be vetted by An Garda Síochána.

On receipt of an application the Minister shall grant to the applicant an employment agency licence permitting them to carry on the business of an employment agency and provide employment agency services in the State. The Minister shall refuse to grant an employment agency licence if the applicant has failed to comply with some of the requirements or if the application is false or misleading. The Minister may refuse to grant an employment agency licence in circumstances such as where the applicant has been

convicted on indictment of an offence in the three-year period prior to making the application. An employment agency licence shall remain in force for a period of three years.

A licence may be revoked by the Minister if the holder a) has been convicted of an offence under the Act, or b) has given false information in their application, or where, in the opinion of the Minister the holder is no longer a suitable person to carry on the business of an employment agency, or the premises where the holder is carrying out the business of an employment agency no longer conforms to the prescribed standards.

### **Register of Employment Agencies**

The Minister is obliged to publish on the internet a list of licensed employment agencies and recognised employment agencies. This register is available on the website of the WRC - [Updated Employment Agencies List - Workplace Relations Commission](#). This register includes the name of the agency and the address of the principal office or principal place of business in the State. In the case of an employment agency that is established in an EEA State and does not have a principal office or place of business in Ireland, then the address of the principal office in that EEA State is included. A list of employment agencies whose licence stands revoked or where the agency is prohibited from carrying on business in Ireland is also published on the WRC's website.

### **Compliance**

In order to ensure holders of Employment Agency Licences are in compliance with relevant legislation, Inspectors of the Workplace Relations Commission may, at all reasonable times, enter and inspect any premises in which the business of an employment agency is being carried out or in respect of which an application for a licence under the Act has been made.

## **10. How do you prevent and sanction abuses of legal constructions such as self-employment, letter-box companies, sub-contracting, and posting of workers, which may be used to commit THB?**

The Workplace Relations Commission (WRC) Inspection and Enforcement Services has primary responsibility for driving compliance with employment and employment permits legislation. This is achieved through a combination of targeted inspections, assisting non-compliant employers in becoming compliant and robust prosecution and enforcement where they do not, and direct and indirect information provision for employers and employees in relation to employment rights and responsibilities.

The WRC Inspectorate has wide ranging powers to exchange information with other State bodies and carries out inspections with other State enforcement bodies where such joint operations would enhance the effectiveness of the participating bodies. Joint Investigation Units (JIUs) have been established between the WRC, Revenue and the Department of Social Protection. Work carried out by the JIUs includes monitoring and compliance activity associated with sectors where tax compliance, social welfare fraud and labour exploitation are common.

The WRC operates a compliance model, and employers are generally given an opportunity to rectify breaches of employment law and repay arrears of wages owed to employees. However, for serious or

repeat breaches, or where the employer fails to co-operate, a prosecution may be initiated. Prosecutions are normally taken in the District Court under summary jurisdiction however in certain circumstances prosecutions may be taken under indictment and these would attract a higher penalty. The penalties set out below are for summary offences.

For employment law breaches, penalties are set out in the individual Acts and are generally (but not always) Class C fines (up to €2,500 and/or 6 months in prison). Under the Employment Permits Acts, it is a criminal offence to work without an employment permit when a person is a non-EU/non-EEA national without any other type of lawful immigration permission allowing them to work in Ireland. Penalties range from up to €3,000 to €250,000, and terms of imprisonment range from up to 12 months to five years depending on whether it is a summary conviction or conviction on indictment in respect of breaches of breach Employment Permit legislation.

Offences under the Workplace Relations Act 2015, including obstructing, failing to comply with or provision or false information or records to an inspector and failure to comply with a Compliance Notice are Class A fines (€5,000 and/or 6 months in prison). Employers may also be served a Fixed Penalty Notices (Section 36, Workplace Relations Act 2015) for specified offences range from €1,500 to €2,000 depending on the offence.

## **11. How do your country's migration legislation and policies seek to prevent THB by enabling lawful migration and legal employment opportunities accompanied by decent work conditions?**

The Employment Permits Act 2024 was commenced in September 2024. This Act consolidates and reforms the previous Employment Permits Acts. Reforms made in the 2024 Act ensure a more flexible employment permits system capable of adaptation to the needs of the labour market. These changes include a simplified process enabling permit holders to change employers after nine months in the State, ensuring they can seek more favourable employment conditions and encouraging employers to provide such conditions. The 2024 Act also allows a permit holder to be promoted within an existing permit and introduces a rights-based seasonal employment permit. Additionally, the 2024 Act introduced provisions which allow the Minister to set out, in regulations, any accommodation, training or expenses that must be provided to a foreign national to whom an employment permit has been granted.

Under the Employment Permits Act 2024, all employers seeking to hire non-EEA/Irish/UK/Swiss Confederation Nationals must first carry out a Labour Market Needs Test (LMNT). This must include the job title, the description of the role, the minimum annual remuneration and the locations of work. Employment permit applications can be refused if the details on the LMNT do not match the proposed contract for the migrant worker.

Ireland has a robust suite of employment legislation in place to provide protections and decent working conditions for employees employed legally in the State. This legislation includes, among others:

- The Organisation of Working Time Act 1997 – providing protections regarding working time
- Terms of Employment (Information) Act 1994 – regulating an employer's obligation to inform employees of the conditions applicable to the contract or employment relationship

- Minimum Notice and Terms of Employment Act 1973 – providing protections for both employers and employees regarding notice periods
- Part 3 and 4 of the Work Life Balance and Miscellaneous Act 2023 – providing the right to request a remote working arrangement
- The Sick Leave Act 2022 – providing statutory sick leave protections for employees
- Unfair Dismissals Acts 1977 – 2021 – providing redress for employees who have been unfairly dismissed
- Protection of Employees (Fix-Term Work) Act 2023
- Protection of Employees (Temporary Agency Work) Act 2012
- Protection of Employees (Part-Time Work) Act 2001
- Payment of Wages Act 1991 and the Payment of Wages Amendment (Tips and Gratuities) Act 2022 – provides protection in relation to the payment of wages, including statements of wages and voluntary payments made to or left for employees i.e. tips and gratuities

The Government is committed to supporting workers and our laws in this area are kept under review to reflect both national and international developments, including at European Union, Court of Justice, and International Labour Organisation level. The Government is committed to a safe working environment, fair treatment and fair wages for the lowest paid workers in our economy.

## **12. How do your country's law and policies to discourage demand that leads to THB address particular vulnerabilities and groups at risk of THB?**

The Criminal Law (Sexual Offences) Act 2017 criminalised the purchase of sex and removed those who offer their services as a prostitute from the existing offences of soliciting for the purpose of prostitution. The Act also created a specific offence of paying for sexual activity with a trafficked person. A key purpose of the Act was to provide additional protection to persons involved in prostitution, especially vulnerable persons and victims of human trafficking. It allows those engaged in prostitution to provide information to An Garda Síochána, for instance if they were subjected to violence by clients, without fear of prosecution for selling sexual services.

The 2024 Employment Permits Act retains the prohibition on the unauthorised employment of third country nationals and the ability to refuse access to or revoke employment permits for employers who have been convicted of employment or immigration law offences. The Act is designed to create a more flexible, responsive and streamlined employment permit system. This includes a simplified process enabling permit holders to change employers after nine months in the State. This measure allows workers to leave exploitative employers without risking their legal status, addressing a key trafficking vulnerability. In cases where a permit holder has experiences employment rights violations, exceptions to the nine-month timeframe for change of employer are considered by the Department of Enterprise, Trade and Employment (DETE) on a case-by-case. Where employment rights violations are reported to DETE or the Workplace Relations Commission (WRC), the WRC can carry out targeted inspections. In addition, the Act introduces seasonal employment permits. Legalising short term migration in sectors like agriculture, reduces reliance on informal or illegal labour routes

Ireland is in the process of developing its Second National Action Plan on Business and Human Rights. It will reflect the three pillars in the United Nations Guiding Principles. The finalised plan will cover a multi-annual timeframe and will reflect new developments in the international understanding of business and human rights, including new EU instruments. It will have key performance indicators which will have assigned responsibilities and timelines to adhere to.

Ireland is an adhering country to the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. The Guidelines provide non-binding recommendations to enterprises on how to operate responsibly. As an adhering country, Ireland has a [National Contact Point \(NCP\)](#) which promotes the Guidelines and related due diligence guidance and handles complaints alleging non-observance of the recommendations contained in the Guidelines. The Ireland NCP offers a non-judicial grievance mechanism to help parties resolve issues relating to the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the Guidelines).

### **13. How do your country's legislation and practice ensure that there is an individual assessment of protection needs at the borders prior to any refusals of entry or expulsions?**

When a person arrives in Ireland an Immigration Officer will ensure that the individual is legally entitled to enter the State. In performing their duties, an Officer is required to consider all circumstances of the individual at the time of entry which includes any concerns that may arise in respect of THB.

All Immigration Officers in the Border Management Unit (BMU) receive Human Trafficking Awareness training, delivered as part of their initial training programme. The BMU works closely with colleagues in An Garda Síochána on the issue of human trafficking, and also cooperates with UK colleagues in relation to ongoing training and knowledge-sharing in this area.

### **14. What measures are taken to prevent THB in sports? What sectors and categories/groups of people have been identified as being at risk?**

There have been no recorded cases of THB in sports in Ireland.

[Sport Ireland](#) is a development agency providing guidance and funding to the sport sector. Safeguarding workshops are delivered to all sports leaders who deliver activities to children and young people. The workshops inform and educate sports leaders to recognise where a child is at risk of harm and informs them of the appropriate reporting processes in line with the Children First Act 2015.

### **15. Have you identified online practices that may increase the risk of becoming a victim of THB for different forms of exploitation? What mechanisms have been developed to prevent the misuse of information and communication technology for THB purposes? What is the practical effect of their implementation?**

An Garda Síochána recognises that there continues to be an increase in the number of individuals and Organised Crime Groups (OCGs), who are integrating technology into their operations, thus taking advantage of the benefits and opportunities various platforms offer to maintain and advance their criminal enterprise. The use of Social Media Platforms (SMPs) by Traffickers is becoming more and more prevalent in the recruitment of victims of THB for both sexual and labour exploitation. Messaging services such as Telegram and We Chat are increasingly used by OCGs involved in this type of crime due to the level of encryption that these platforms provide. This presents both a challenge and a threat to tackling THB.

The use of short terms leases such as Airbnb and Booking.com is becoming a more preferred option for traffickers and organisers operating brothels as it is easier to avoid detection from Law Enforcement. An Garda Síochána employ the use of online scraping tools such as “trafficJam” and “voyager” and work closely with the (National Consumer Agency) NCA on operations that use the internet as an enabler for THB. An Garda Síochána also work with companies like Airbnb and Booking.com to highlight this new crime trend.

### **Coimisiún na Meán’s Online Safety Framework: Holding Regulated Entities to Account**

Coimisiún na Meán is Ireland’s Digital Services Coordinator and a member of the European Board for Digital Services, an independent advisory group of digital services coordinators. As the agency for developing and regulating a thriving, diverse, creative, safe and trusted media landscape, its Strategy Statement 2025-2027 provides a framework to ensure a media landscape that serves the public interest and underpins fundamental rights. In this Strategy, Coimisiún na Meán identified a range of delivery tools including "Holding Regulated Entities to Account". Coimisiún na Meán uses direct regulatory tools such as codes and rules, licensing, supervision, enforcement and sanctions to hold regulated entities to account. This will help enable Coimisiún na Meán to implement and enforce their Online Safety Framework. Coimisiún na Meán’s Online Safety Framework is made up of three key pieces of legislation:

- the Digital Services Act,
- the OSMR Act, which allows Coimisiún na Meán to develop binding Online Safety Codes
- the EU-wide Terrorist Content Online Regulation (TCOR).

### **The Digital Services Act (DSA)**

The Digital Services Act (DSA) is a harmonised EU-wide law that establishes a framework for regulating illegal content, including THB. It requires online platforms to swiftly remove illegal content, once it is reported or identified. In addition, the largest platforms are required to provide transparency reports and undergo risk assessments with regard to the design and functioning of their services and implement risk mitigation measures in respect of risks identified.

On September 12th 2024 Coimisiún na Meán opened a focused review of platforms’ compliance with two articles of the DSA – providing points of contact for users (Art 12) and providing user-friendly and effective reporting mechanisms (Art 16). Under this review, information requests were issued to multiple platforms based in Ireland. Coimisiún na Meán is currently undertaking an assessment of the responses received and will engage with the platforms to ensure that their reporting mechanisms and point of contacts comply with the requirements of the DSA.

Where concerns remain, Coimisiún na Meán can issue a compliance notice directing platforms to address any shortcomings identified in their systems and processes. If this does not lead to changes and improvements, Coimisiún na Meán can open a formal investigation. If the investigation leads to a finding of non-compliance, Coimisiún na Meán can impose sanctions, such as a fine. Coimisiún na Meán can also enter into a binding commitment agreement with a platform, in which the platform gives undertakings to bring its behaviour into line with the law.

On September 26th 2024 Coimisiún na Meán certified 'Appeals Centre Europe (ACE)' as an Out-of-Court Dispute Settlement (ODS) Body, under Article 21 of the DSA. The area of expertise for which the certification is granted is the application and enforcement of terms and conditions of online platforms.

Pursuant to Article 22 of the DSA, Coimisiún na Meán can award the Trusted Flagger status to entities who meet the accreditation conditions. An accredited Trusted Flagger's role is to flag illegal content to online platforms (including flags related to THB). Online platforms are obligated to give priority to notices (flags) received from accredited Trusted Flaggers and process and decide upon the flags received without undue delay. The Central Bank of Ireland have been granted the Trusted Flagger status for three years, from 2 April 2025 to 2 April 2028. Their designated area of expertise is financial scams and fraud, including the provision and/or offer of financial services without authorisation.

### **The Online Safety Code**

On October 21<sup>st</sup> 2024 Coimisiún na Meán published the finalised Online Safety Code under the 2009 Broadcasting Act (the Act) and Article 28b of the EU Audiovisual Media Services Directive 2018 (AVMSD).

#### **The Online Safety Code comprises two parts:**

Part A of the Code sets out the legislative and regulatory context for the Code and provides for the general obligations of Video Sharing Platforms (VSPs), pursuant to Section 139K of the Act and Article 28b of the EU Audiovisual Media Services Directive 2018 (AVMSD). The Code applies specific rules to Video Sharing Platforms (VSPs), which are a subset of relevant online platforms as defined under the Act, on how they handle user-generated video (and associated) content, as well as audiovisual commercial communications (video advertising).

Part B of the Code sets out specific obligations of Video Sharing Platforms (VSPs) and sets out appropriate measures that VSPs must take to provide the protections for children and the general public required by Article 28b(1)(a), (b) and (c) of the EU Audiovisual Media Services Directive 2018 (AVMSD).

Part A of the Code became effective after 28 days, from 19 November 2024. For Part B, there is an implementation window of up to nine months to allow platforms to become compliant with the Code if platforms need time to design internal systems to comply with the relevant obligations Part B of the Code shall come into effect on 21 July 2025.

The Online Safety Code includes actions VSPs must take to protect users, in particular, younger users, including from illegal and harmful online content, such as content which may impair the physical, mental, or moral development of children. VSPs must address video content which gives rise to any risk to life or risk of significant harm to physical or mental health. Measures include prohibiting upload of such content in their Terms and Conditions and suspending users who frequently infringe these. The obligations of VSPs under

the Code relating to audiovisual commercial communications encompass the provision of protections which shall not market, sell or arrange:

- audiovisual commercial communications harmful to the general public as defined in this Code,
- audiovisual commercial communications harmful to children as defined in this Code,
- restricted audiovisual commercial communications as defined in this Code.

**16. What measures are taken to raise awareness of the risks of technology-facilitated THB, including among children, parents, teachers, child care professionals and social workers? What technology-based initiatives exist in your country to disseminate information to groups/communities at risk of THB?**

Please see response to Question 2b above on measures to reduce children's vulnerability to THB such as improving their media literacy and online safety skills.

With regard to technology facilitated THB, as stated above in response to Question 15, An Garda Síochána maintain a co-operative relationship with companies such as booking.com and AirBnb. As detailed in response to Question 4b, An Garda Síochána, carry out regular training and give presentations to healthcare and education sectors.

The Department of Education's Digital Strategy for Schools supports an extensive array of training material and resources on online safety that were developed and provided to teachers. Resources are also developed and disseminated that help teachers integrate digital citizenship and online safety into teaching and learning in their schools.

Ireland's new independent online safety and media regulator Coimisiún na Meán (referenced in response to Question 2b and 15) works collaboratively with An Garda Síochána in areas of illegal content and content that is harmful to the public. Coimisiún na Meán is currently discussing incorporating online safety messaging into the Garda schools programme with a potential reach of a significant cohort of young audiences across Ireland. Through a "Collaborating & Cooperating for Impact" approach partnerships with civil society can be utilised to increase impact.

Coimisiún na Meán's Strategy Statement 2025-2027 provides a foundation for future initiatives through our "Empowering & Supporting the Public" delivery tool, which employs "media literacy, education, outreach and complaint handling to educate and empower the public." This aligns with its "Children" outcome, which aims for "better informed parents and children, confident in making safe media choices."

**17. How do you cooperate with ICT companies and Internet service providers, including content hosts and social media, in preventing THB?**

Please see response to Question 15 above on Coimisiún na Meán's Online Safety Code and The Digital Services Act (DSA).

Coimisiún na Meán adopted and applied its first binding Online Safety Code in October 2024. This code sets out what designated video-sharing platforms like Facebook, TikTok and Instagram must do, at a systemic level, to protect users from certain illegal and harmful online content.

The Digital Services Act (DSA) is a harmonised EU-wide law that establishes a framework for regulating illegal content, including THB. It requires online platforms to swiftly remove illegal content once it is reported or identified and, in the case of the largest platforms, provide transparency reports and undergo risk assessments with regard to the design and functioning of their services and implement risk mitigation measures in respect of risks identified.

To ensure that regulated Platforms comply with the Online Safety Code (the Code) and the Digital Services Act (DSA), Coimisiún na Meán has a Platform Supervision team that frequently engages with Platforms to raise issues of concern and to encourage early change that prioritises user safety. This includes engaging with platforms and assessing their role in responding to illegal content, such as THB. If issues emerge in regard to compliance, Coimisiún na Meán may move to investigation and enforcement, as outlined in the Code and the DSA.

The Human Trafficking Investigation and Co-ordination Unit (HTICU) and Organised Prostitution Investigation Unit (OPIU) hold reciprocal meetings with companies like Revolut, AirBnB and booking.com. In addition, HTICU Sergeants are involved in a co-operative working group with Ernst and Young accounting firm.

## **18. How are policies and practices aimed at preventing THB informed by the experiences of victims and at-risk individuals?**

Policies and practices aimed at preventing exploitation, particularly in the areas of human trafficking, victim support and migration are increasingly shaped by the lived experience of victims and those at risk. Victims insights are gathered and applied through a combination of formal consultation processes, operational learning from frontline agencies, and structured engagement with NGOs and civil society organisation.

The Third National Action Plan to Prevent and Combat Human Trafficking (2023-2027) was developed following stakeholder engagement with civil society organisations working directly with victims. Civil society has a crucial role to play and the support and expertise of various NGOs who are experts on the ground is used for many of the actions in the plan. A Stakeholders' Forum, drawn from civil society, and a more focused Labour Exploitation Subgroup, which includes representatives from civil society, are convened. The Irish Human Rights and Equality Commission (IHREC) has places for its representatives on both groups and several of its staff have attended.

In addition to engaging with the Council of Europe evaluation process, Ireland continues to work actively with all our partners in multilateral international organisations who are active in tackling human trafficking, e.g. the European Union, the Organization for Security and Cooperation in Europe (OSCE) and the UN. These organisations periodically conduct country visits and make recommendations for areas of improvement.

## **II. IDENTIFICATION OF VICTIMS AND PROTECTION OF THEIR RIGHTS (Articles 10, 11, 12, 14 and 16)**

**19. Among the victims of THB identified, were any subjected to exploitation on the basis of their sexual orientation and/or gender identity (LGBTI+: lesbian, gay, bisexual, transgender or intersex), especially teenagers and young adults? If yes, did any of them report on police misconduct?**

An Garda Síochána pursue strict adherence to their code of Ethics and non-discrimination. An Garda Síochána have engaged with foreign national victims who report discrimination or victimisation based on LGBTI+ but that discrimination is not reported to have taken place in Ireland.

**20. What specific measures are taken to ensure that trafficked persons who are migrant workers, including in an irregular situation, are identified as victims of THB and have access to the rights provided for in the Convention? Is there cooperation with specialised NGOs, trade unions, and employers to enhance the identification and protection of potential victims within these at-risk groups?**

An Garda Síochána is the relevant authority for the investigation and prosecution of human trafficking. They are also currently the sole competent authority for the identification of victims of THB. Victims of THB can self-refer to An Garda Síochána via the [Blue Blindfold website](#).

An Garda Síochána have been proactive in working to identify victims through Action Days. Trafficked persons who are migrant workers, including those in an irregular situation, have been identified through Multi Organisation Labour Exploitation Joint Action Days. These are joint operations undertaken by The Human Trafficking Investigation and Co-ordination Unit (HTICU) of An Garda Síochána, the Workplace Relations Commission (WRC) and Garda National Immigration Bureau (GNIB). Throughout 2024, there were five such joint operations. These operations target premises potentially in breach of Employment or Immigration legislation and where Labour Exploitation is happening. These actions are deliberately high visibility, designed to engage and raise awareness in respect of Human Trafficking, immigration and workplace vulnerabilities.

During the course of its workplace inspections, Workplace Relations Commission (WRC) may have opportunities to detect indicators of THB. Where this arises, the WRC will refer the matter to An Garda Síochána as the WRC has no statutory function or responsibility in relation to the investigation and prosecution of THB. The WRC's statutory responsibilities relate to, among other matters, ensuring compliance with, and providing information and awareness initiatives in relation to, employment law entitlements and obligations. WRC officials receive training in the identification of the indicators of human trafficking.

Under the revised National Referral Mechanism (NRM) the WRC will be a designated Competent Authority and a member of the NRM Operational Committee. As part of that role it will have the authority to designate

an applicant a 'presumed victim of human trafficking', and enter that applicant into the revised National Referral Mechanism as such, and refer the application to the Operational Committee for decision.

The Department of Justice, Migration and Home Affairs convenes a Labour Exploitation Sub-Group. This is a sub-group for the Human Trafficking Oversight Group, provided for in the Third National Action Plan to Prevent and Combat Human Trafficking 2023 – 2027 (the NAP). This subgroup provides the opportunity for NGOs, members of An Garda Síochána, the Workplace Relations Commission and the Department of Enterprise, Trade and Employment, Office of the Director of Public Prosecutions as well as Unite the Union to discuss together emerging trends in Human Trafficking in Ireland. The Human Trafficking Stakeholders' Forum, also convened under the NAP, enables NGOs working in the area to share their knowledge.

## **21. What measures are in place to encourage victims of THB to report their situation to the authorities and/or civil society organisations?**

The International Protection Office (IPO) has procedures in place when dealing with potential victims of Human Trafficking and also has an internal guidance paper on this. The Officer who first notes the allegation of Trafficking, at whatever stage of the IPO process, will inform the applicant that they are taking a note of what the applicant has alleged and that this information will be shared with the Human Trafficking Investigation and Co-ordination Unit (HTICU) of an Garda Síochána. The Officer should also advise the applicant to contact the Legal Aid Board (LAB) to seek guidance and make a complaint to An Garda Síochána about being trafficked into the State.

The Health Service Executive (HSE) has increased its online presence through the development of their Human Trafficking site directed towards potential victims of human trafficking, signposting access to identification and support. This includes the online presence of the HSE Women's Health Service which has been developed to reach out to women vulnerable to human trafficking and exploitation.

An Garda Síochána's [Blue Blindfold Website](#) provides a facility for the reporting to them of suspicious activity that may amount to Human Trafficking.

The National Media has reported on Workplace Relations Commission investigations of human trafficking, particularly in the restaurant field, bringing awareness of THB to a wider audience and the potential for redress for labour exploitation. The awareness-raising campaigns of An Garda Síochána are reported in Question 4.

## **22. What specific measures are taken in your country to detect/identify and refer to assistance possible victims of THB at the borders? What measures are taken in your country to identify victims of THB during the examination of asylum applications and prior to the return of persons whose applications are rejected?**

All Immigration Officers in the Border Management Unit (BMU) receive Human Trafficking Awareness training, which is delivered as part of their initial training programme. The BMU works closely with colleagues in An Garda Síochána and their The Human Trafficking Investigation and Co-ordination Unit (HTICU) to refer cases identified at the Border where concerns relating to human trafficking arise. The BMU

also cooperates with a number of stakeholders on targeted operations to identify potential victims of Human trafficking.

The BMU also cooperates with UK colleagues in relation to ongoing training and knowledge-sharing in this area.

### **23. What measures are taken in your country to identify victims of THB in immigration detention centres and prisons?**

Ireland does not have immigration detention centres.

### **24. What services are available in your country to provide specific assistance to particularly vulnerable victims, such as:**

- a. persons with disabilities;**
- b. LGBTI+ persons;**
- c. victims with children;**
- d. victims with severe mental and physical trauma;**
- e. homeless persons;**
- f. other.**

The remit of the Department of Justice, Migration and Home Affairs' International Protection Accommodation Services (IPAS) is accommodation for International Protection Applicants. This may include victims of trafficking.

IPAS's role primarily involves the provision of material reception conditions for International Protection Applicants while in the process of making their applications. IPAS offer to assess the vulnerability of all families making an application for International Protection, in accordance with Regulation 8 of the European Communities (Reception Conditions) Regulations 2018 (S.I. 230 of 2018). Under the Regulations, IPAS is obliged to assess — (i) whether a recipient is a recipient with special reception needs, and (ii) if so, the nature of his or her special reception needs, this includes a person who has declared themselves a victim of trafficking.

In November 2023, IPAS opened a dedicated accommodation centre for female victims of trafficking who are International Protection Applicants. It is an 8-bed accommodation unit for women who are identified as victims of trafficking, including those trafficked for the purpose of sexual exploitation. Each service user has an assigned case manager providing individualised assessment and support planning. The centre is currently operating as a pilot programme. The pilot is overseen by a steering group which include representatives from the Department of Children, Disability and Equality; the Health Service Executive; An Garda Síochána and the DePaul Trust.

Health services for International Protection applicants are mainstreamed and applicants can access them through the same referral pathways as Irish citizens. For health services, including referrals to disability and mental health services, this is through primary care, GP referral and emergency services. IPAS have continued ongoing engagement with the HSE National Social Inclusion Office and the HSE Anti Human

trafficking team regarding the access to health services including psychological assistance to those who reside in IPAS accommodation. Specific assistance is available for:

- **persons with disabilities** – Health Service Executive (HSE) Disability services provide direct services to adults and children with disabilities also through funding of non-statutory organisations. HSE Safeguarding Protection Teams for protection of vulnerable adults are in place all over the country: [Safeguarding and Protection Teams - HSE.ie](https://www.hse.ie/eng/health/protect/protect.htm)
- **LGBTI+ persons** - Services are provided by agencies funded through Department of Health and and NGO sector
- **victims with children** – Services are provided by TUSLA Child and Family Services.
- **victims with severe mental and physical trauma** - Access to a range of health care is through GP services, and HSE Social inclusion teams.
- **homeless persons** - HSE National Social Inclusion Office (NSIO) oversees and manages a range of services and supports to address homelessness, focusing on improving the health and wellbeing of those affected. These services are delivered through in-reach and outreach programs. Many are provided by voluntary organisations working on behalf of the HSE to support people from diverse backgrounds.

**25. How do you support the (re)integration of victims of THB? What processes are in place in your country to provide assistance to victims of THB exploited abroad after their return?**

Health Service Executive Anti-Human Trafficking Team are available to all identified victims of human trafficking once identified by the current competent authority, An Garda Síochána.

**26. If there is a provision in your country's law that provides for the possibility of issuing a residence permit owing to the victim's personal situation, how is this interpreted in practice? Please provide examples.**

Yes, current arrangements can be found in the [Administrative Immigration Arrangements for the Protection of Victims of Human Trafficking](#). These arrangements are currently under review in the context of implementation planning for the revised National Referral Mechanism, as well as broader immigration and legislative reforms.

**27. What measures are in place to ensure that the identity, or details allowing the identification, of a child victim of trafficking are not made publicly known?**

As part of the Children's Act, the identification of Child Victims is never released by An Garda Síochána or Tusla or the Courts.

## **28. What measures are in place aimed at encouraging the media to protect the private life and identity of victims? DOJ**

In Ireland it is an offence for the media or other person to publish the identity of a human trafficking victim. Section 11 of the Criminal Law (Human Trafficking) Act 2008 provides:

*“11.— (1) Where a person is charged with an offence under section 2 or 4, or section 3 (other than subsections (2A) and (2B)) of the Act of 1998, **any person who publishes or broadcasts any information, including—***

*(a) any photograph of, or that includes a depiction of, the alleged victim of the offence, or*

*(b) any other representation of the physical likeness, or any representation that includes a depiction of the physical likeness, of the alleged victim of the offence, **that is likely to enable the identification of the alleged victim of the offence**, shall, subject to any direction under subsection (2), be guilty of an offence and shall be liable upon conviction on indictment to a fine, or imprisonment for a term not exceeding 10 years, or both.”*

Thus, it is an offence for the media or other person to publish the identity of a human trafficking victim. Subsection (2) allows for the judge to direct publication of certain information such as in circumstances where the victim waives their right to anonymity.

## **29. Have there been cases of diplomatic households (of your country’s diplomats abroad and of foreign diplomats in your country) employing domestic staff in conditions which could be forced labour or human trafficking? If yes, how was the issue of diplomatic immunity addressed? How were the victims identified, assisted and protected?**

The Department of Foreign Affairs have measures in place to inform diplomatic staff about human trafficking and they liaise with the embassies in relation to that. No trafficking or forced labour case has come to the Department of Foreign Affairs attention as far as Private Domestic Employees (PDEs) are concerned since the last report in 2021. The Department of Foreign Affairs is committed to continuously strengthening their policy on PDEs by reviewing and updating their guidelines. They updated their guidelines in 2023 and their objective in introducing two changes was to limit the overall number of PDEs, with a view to reducing the risk of cases of alleged mistreatment and to make the overall management of the caseload of PDEs more manageable and sustainable, given the intensive workload involved in managing each PDE application. *Procedures relating to the employment of private domestic employees by accredited members of the mission* (available [here](#)) were originally introduced in 2014 to help prevent exploitation of domestic workers in diplomatic households. In 2023, the following changes were introduced to further strengthen the policy:

- Heads of Missions only will be entitled to bring a PDE to Ireland to take up employment (other VCDR grades will no longer be entitled to bring a PDE to Ireland)
- Limit of 1 PDE per Heads of Mission unless there are very exceptional circumstances.

### **30. What specific steps are taken in your country to identify victims of THB amongst persons recruited and exploited by terrorist/armed groups?**

All potential victims are assessed on a case by case basis by An Garda Síochána. There is no specific policy to identify persons requirement by terrorist/armed groups.

### **31. Are there requirements in your country's legal framework for the detection and removal of THB-related Internet content, and what are the sanctions for non-compliance? Is there a code of conduct for providers? If a person is detected as a presumed victim of THB in the process, how is this person referred to assistance?**

Since its establishment in March 2023, Coimisiún na Meán has taken positive steps to impose effective, binding regulation on online services through the implementation of the Online Safety Framework. The Framework consists of the Online Safety Code, the EU Digital Services Act (DSA), and the EU Terrorist Content Online Regulation. This Framework gives Coimisiún na Meán the tools to address the root causes of harm online, including the availability of illegal content, the harmful impacts of recommender systems, and inadequate protections for children on social media services.

Harmful online content is categorised and addressed within several legislative and regulatory frameworks. The Online Safety and Media Regulation (OSMR) Act 2022 primarily concerns 'offence-specific' as well as harmful forms of online content. 'Offence-specific' includes content that already aligns with 44 existing criminal definitions such as distribution of intimate images without consent, child sexual abuse materials, and content designed to intimidate a person associated with sexual offences proceedings. Offence-specific harmful online content also includes the Child Trafficking and Pornography Act 1998, which addresses offences that include the production, distribution, and possession of child pornography, and the trafficking and use of children for the production of child pornography.

The OSMR Act also provides for non-offence specific categories of harmful online content in relation to:

- Content involving the promotion of self-harm and suicide
- Cyberbullying or cyber-humiliation of another person
- Content involving the promotion of eating disorders

On 21 October 2024, Coimisiún na Meán adopted and applied its first binding Online Safety Code under the Act, setting out what designated video-sharing platforms like Facebook, TikTok and Instagram must do, at a systemic level, to protect users from certain illegal and harmful online content. Part A of the code was applied with effect from 19 November 2024 and sets out the broad actions that those services must take to protect users, in particular, children from content which may impair physical, mental or moral development, or to the general public from content which incites hatred or violence, is racist or xenophobic. Part B of the code will apply from 19 July 2025 and provides more prescriptive obligations such as operating appropriate age-verification systems, and establishing parental controls, content rating systems, and effective complaint mechanisms.

The OSMR Act also provides An Coimisiún with robust monitoring and enforcement powers to ensure that platforms implement compliant systems and processes. As part of these powers, it may issue notices requiring online platforms to take down specifically defined harmful content and conduct investigations of suspected non-compliance and, if appropriate, impose sanctions, including of a financial nature. As set out in OSMR Act, a failure to comply with the Code can lead to significant fines of up to €20m or 10% of turnover, whichever is higher. In addition, continued non-compliance can lead to criminal sanctions for senior management.

An Garda Síochána also has powers of investigation that may result in content removal notices for serious illegal content targeting children, like child sexual abuse materials (CSAM). In addition, Courts in Ireland can issue orders to remove or block content in several instances such as the removal of specific content associated with criminal offences related to children. Orders under laws like the Harassment, Harmful Communications, and Related Offences Act 2020 may also result in blocking or taking down harmful content like cyberbullying and non-consensually shared intimate images and seizure of child sexual abuse material under the Child Trafficking and Pornography Act 1998.

Coimisiún na Meán has also been designated as Ireland's Digital Services Coordinator under the EU Digital Services Act (DSA). Under this EU Regulation, and among many other things, the Very Large Online Platforms and Search Engines across the EU must assess and mitigate against risks of exposure to illegal and certain harmful online content, including by means of age-verification or age-assurance. The regulation of these larger services is primarily led by the European Commission, with the support of Digital Services Coordinators across the EU, including Coimisiún na Meán in Ireland.

Coimisiún na Meán has been provided with the necessary powers for supervision and enforcement of the DSA, including the ability to impose administrative fines and penalties. Financial penalties for a breach of the DSA are up to 6% of global turnover. Coimisiún na Meán does not currently have a specific referral mechanism for presumed THB victims and is still developing operational procedures in our Contact Centre, setup in 2024, which engages with members of the public. There is however an established 'red flag' escalation process for correspondence which indicates that there is an imminent risk to life/health/safety, with established channels of communication with emergency services such as AGS.

Furthermore, Coimisiún na Meán's Strategy Statement 2025-2027 provides a framework for future action through our 'Collaborating & Cooperating for Impact' delivery tool, which emphasises working with relevant partners. As it implements this strategy through annual work programs for 2025-2027, Coimisiún na Meán will potentially develop work in line with its 'Public Safety' outcome, which aims for 'a media landscape that strengthens public health and safety'. This may include working with An Garda Síochána through the establishment of a co-ordination hub and co-operation agreement as well as organisations such as TUSLA and IHREC. Any actions will be grounded in its Online Safety framework namely, the OSMR Act, DSA, and Terrorist Content Online Regulation (TCOR).

### III. INVESTIGATION, PROSECUTION, SANCTIONS AND MEASURES (Articles 4, 18, 19, 23, 24, 27, 28 and 30)

#### 32. Is the abuse of a position of vulnerability part of the human trafficking offence in your country's law? How are the concepts of "vulnerability" and "abuse of a position of vulnerability" defined in law? Have they been subject to judicial interpretation? If yes, please provide relevant case-law.

The abuse of a person's position of authority or taking advantage of a person's vulnerability are elements of the offence of human trafficking under section 4(1)(c) of the [Criminal Law \(Human Trafficking\) Act 2008](#). The concept of 'vulnerability' is not defined within the legislation which affords the Court discretion in assessing the vulnerability of a victim on a case by case basis. Reference to the 'abuse of a position of vulnerability' is not defined in the legislation for the same reason, allowing judicial discretion to look at the facts of the case and the relationship of the offender to the victim. Section 4(1)(c) provides:

*"A person (in this section referred to as the "trafficker") who trafficks another person (in this section referred to as the "trafficked person"), other than a child or a person to whom subsection (3) applies, for the purposes of the exploitation of the trafficked person shall be guilty of an offence if, in or for the purpose of trafficking the trafficked person, the trafficker—*

...

*(c) abused his or her authority or took advantage of the vulnerability of the trafficked person to such extent as to cause the trafficked person to have had no real and acceptable alternative but to submit to being trafficked..."*

Currently, vulnerability for the purposes of Human Trafficking prosecutions, is interpreted broadly in line with the United Nations Office in Drugs and Crime issue paper. Vulnerable persons are those who, due to reasons of age, gender, physical or mental state, or due to social economic, ethics or cultural circumstances find it especially difficult to fully exercise their rights before the justice system recognised by law (see [https://www.unodc.org/unodc/en/evaluation/reports\\_year\\_2019.html](https://www.unodc.org/unodc/en/evaluation/reports_year_2019.html)).

The definitions have not been subject to judicial interpretation and there is no relevant case-law in this area. However, in [DPP v Edosa & Anor \[2023\] IECA 38](#), one of the grounds of appeal relied upon by the defence was that the trial judge had erred in describing the victims as being in a position of vulnerability. The Court of Appeal did not engage with this ground of appeal, focusing instead on other grounds raised by the defence and as such the judgment does not provide judicial interpretation of the term.

#### 33. Is the special vulnerability of the victim considered as an aggravating factor for the offender's sentence?

The Irish Constitution 1937 sets out a separation of powers between the Judiciary, Legislature and Executive. Judges retain a broad discretion in Ireland to impose a sentence in accordance with the particular facts of an individual case. Judges must pass sentences that are proportionate to the offence and the personal circumstances of the offender. Within the remit of these factors, the court has discretion to sentence an accused taking into consideration all the facts of the case before him or her. The judge will consider both

aggravating and mitigating factors to include facts regarding how the offence was committed. This would include any special vulnerability of the victim. The Court will also take into account and may receive into evidence a victim impact statement outlining any effect of the offence on the victim. The special vulnerability of the victim will be considered in the context of the facts of the offence and impact on the victim and will be an aggravating factor in sentencing the offender. Further information in relation to the sentencing process for judges is available at this link [Judicial Council Sentencing Guidelines](#)

**34. According to national case-law, what forms of vulnerability are mostly abused by offenders in human trafficking cases? Please provide specific examples that show how the concept of “abuse of a position of vulnerability” is used in practice. What are the challenges in its application? Is it sufficient to prove the existence of a position of vulnerability of the victim, or must it also be proven that the defendant knew or should have known of the victim’s vulnerability, and intentionally manipulated the victim on this basis?**

The forms of vulnerability dealt with in previous cases involve sexual exploitation, whereby the victim has no other ties to the country, and labour exploitation, whereby the victim is reliant on the accused for wages or sourcing employment. The form of vulnerability generally arises through the nature of the relationship and reliance upon the person in authority. This could be by way of reliance on the person for accommodation, food, transport or communication, for example.

As set out in Ireland’s GRETA 2022 report, in [DPP v Edosa & Anor \[2023\] IECA 38](#), two Nigerian nationals were convicted of trafficking four individuals for the purpose of sexual exploitation. Since that report, these convictions have been confirmed on appeal. Related to this case, one Nigerian national has been prosecuted for conspiracy to traffic three individuals for the purposes of sexual exploitation. In December 2024 this accused was convicted and sentenced to 4.5 years imprisonment.

Since the GRETA report 2022, there has been a case involving an Irish accused who was convicted of trafficking a child for the purposes of sexual exploitation, in addition to other offences including rape and sexual assault. The accused was convicted and was sentenced to 13 years imprisonment, with the final year suspended. That sentence is currently under appeal.

Two Brazilian nationals were previously prosecuted for trafficking two individuals for the purposes of sexual exploitation. Due to witness difficulties, including one witnesses going into labour at the time of trial, a *nolle prosequi* was entered on the trafficking charges and the accused pleaded guilty to other related offences including organised prostitution and money laundering.

One Romanian national has been prosecuted for human trafficking one individual for the purpose of sexual exploitation. Other charges included organised prostitution and coercive control. The jury were unable to reach a verdict, however following a re-trial in April 2025, the accused was found guilty by a jury and is awaiting sentence.

In a current case, two Slovakian nationals have each been charged with five counts of human trafficking for the purposes of labour exploitation in County Cork. One accused has been further charged with 25 counts of

money laundering relating to the theft of wages from the trafficking victims. Another accused has been charged with 1 count of money laundering relating to the theft of wages.

In a 2024 case, two Turkish nationals were investigated for alleged human trafficking for the purposes of labour exploitation. While there was insufficient evidence to prosecute for the trafficking offences, one of the suspects was prosecuted summarily for three breaches of section 23 of the Employment Permits Act 2006.

Two Romanian nationals are to be prosecuted for allegedly trafficking three individuals (including 1 child) for the purpose of labour exploitation. Extradition proceedings are currently in being for both suspects who are outside the jurisdiction.

In all human trafficking cases, the abuse of a victim's vulnerability will be a factor to some degree as 'exploitation' requires taking advantage of someone for personal gain. While the prosecution does not specifically have to prove the accused's knowledge of the victim's vulnerability and intentional manipulation of this vulnerability, the facts should establish exploitation as a result of the victim's vulnerability or the accused's position of authority.

**35. Is the concept of "abuse of a position of vulnerability" addressed in criminal justice training? Is there any specific guidance on applying this concept? Please provide copies of guidance and/or training materials that shed light on how this concept should be applied in practice.**

The Office for the Department of Public Prosecutions (ODPP) Human Trafficking Unit has undertaken training with the lead for modern slavery for the Crown prosecution Services (CPS) in the UK. This covered the UK experience of the expanded National Referral Mechanism (NRM) which provides for the referral of potentially trafficked victims and the 'county lines' prosecutions for trafficking juveniles for the purpose of forced criminality. The ODPP Human Trafficking Unit has also received training from international experts, including specialized prosecutors from UK, USA, and Romania.

**36. What procedures and measures exist in your country to take into account the specific needs of vulnerable victims at the different stages of criminal proceedings?**

Special measures are considered in every prosecution where vulnerable witnesses and complainants are giving evidence. It is acknowledged that victims of human trafficking will generally be considered vulnerable individuals.

Section 15 of the [Criminal Justice \(Victims of Crime\) Act 2017](#) is concerned with Assessment of the Victim, Section 16 with Application of protection measures and special measures during investigations and Section 17 with Special measures during investigations. To date special measures have been used in two trafficking prosecutions.

The use of video link for witnesses to give their evidence, court room screens in the witness box or the assistance of registered intermediaries are provided for under the [Criminal Evidence Act 1992](#) and [Criminal Justice \(Victims of Crime\) Act 2017](#). This was employed in the case involving two adult Brazilian victims referred to in response to Question 34. Both complainants were permitted to give their evidence via video link.

The use of a Registered Intermediary is provided for under [section 14 of the Criminal Evidence Act, 1992](#). A Registered Intermediary is a professional skilled in communication with a professional background such as speech and language therapy, social work, clinical psychology or occupational therapy. In the case of the prosecution of an Irish accused (referred to in response to Question 34), involving a child victim of trafficking for the purpose of sexual exploitation, the use of a registered intermediary was availed of due to the child victim's vulnerabilities.

Additional relevant provisions are provided for under [Sections 10 of the Criminal Law \(Human Trafficking\) Act 2008](#), which provides for exclusion of members of the public from proceedings and [Section 11 of the 2008 Act](#), which provides for the anonymity of the victim. [Section 55 of the Criminal Justice \(Miscellaneous Provisions\) Act 2023](#) provides further assistance in relation to anonymity measures the court may order.

Court accompaniment is also provided to victims of crime, their families and witnesses. Ireland's Victim Support at Court service, VSAC (<https://www.vsac.ie/>), is a voluntary service working closely with An Garda Síochána and the Courts Service of Ireland to support victims by providing information before and during the trial, and attending court with the victim. Interpreters and translators are also available.

### **37. If you have criminalised the use of services of a victim of THB, how is this provision applied in practice? Please provide any relevant case-law.**

In relation to sexual exploitation, the sale of sexual services is no longer a criminal offence however the purchase of sexual services is a criminal offence.

[Section 5 of Criminal Law \(Human trafficking\) Act 2008](#) makes it an offence to solicit or importune a trafficked person for the purposes of prostitution. A person (other than the trafficked person) who accepts or agrees to accept payment or benefit from a person who solicits or importunes the trafficked person, is also guilty of an offence. In proceedings for an offence under this section, it is a defence for the defendant to prove that he or she did not know and had no reasonable grounds for believing that the person in respect of whom the offence was committed was a trafficked person.

[Under section 6 of the 2008 Act](#), where an offence of trafficking is committed by a corporate body and is proved to have been committed with the consent or connivance of or to be attributable to any neglect on the part of any person, being a director, manager, secretary or other officer of the corporate body, or a person who was purporting to act in such capacity, that person, as well as the corporate body, can be charged with an offence and will be proceeded against and punished as if he or she were guilty of the first-mentioned trafficking offence.

Aside from the above, there is no other legislation in place criminalising the use of labour of a trafficked person and no relevant case law in this area. The Corporate Sustainability and Due Diligence Directive (CSDDD) when it is transposed into national law, will require companies within the scope of the Directive to apply due diligence in relation to their employees and supply chain.

**38. What technology-based tools and initiatives exist in your country to support investigations and enhance prosecution of THB cases? What training is provided to law enforcement officials, prosecutors and judges on THB facilitated by information and communication technology?**

Both The Human Trafficking Investigation and Co-ordination Unit and Organised Prostitution Investigation unit (OPIU) employ the use of online scraping tools such as ‘trafficJam’ and ‘voyager’ and work closely with the NCA on operations that use the internet as an enabler for THB. They also give regular training to Legal Graduates.

In criminal prosecutions, the use of special measures such as video link for witnesses to give evidence from abroad or from outside the courtroom are provided for under the Criminal Evidence Act 1992 and Criminal Justice (Victims of Crime) Act 2017 as referred to above. These allow prosecutions to proceed where a witness is unable to attend from another country, or a victim is at risk of re-victimisation should they be required to attend court to give their evidence.

In 2024 a member of the ODPP Human Trafficking Team attended an OSCE policy brief on the ‘Bali Process’ and the use of generative AI to facilitate the trafficking of persons. This prosecutor then published a training article in an internal office publication outlining how generative AI can generate content, culture, language models, pictures, speech, and videos to upscale trafficking processes. The article highlighted the role of certain apps, Telegram, astroturfing and escort sites in human trafficking and the need for a comprehensive AI regulatory framework.

**39. In what ways, if any, does your country utilise provisions from the Council of Europe Cybercrime Convention (Budapest Convention) to fight THB? If not, why is that the case?**

Ireland signed the Budapest Convention in February 2002. However, while it has not yet been ratified, Ireland does provide mutual legal assistance to other member states and signatories to the Convention. The current legal framework for mutual legal assistance between Ireland and other states is set down in the [Criminal Justice \(Mutual Assistance\) Act 2008](#). Section 2 of the Act defines ‘relevant international instrument’ as the international instrument in accordance with which a request for assistance is made. The listed international agreements include the following treaties which have been ratified by Ireland and form the basis of the vast majority of both incoming and outgoing mutual assistance requests:

- The Council of Europe Convention on Mutual Assistance in Criminal Matters (1959)
- The Additional Protocol to the Council of Europe Convention on Mutual Assistance in Criminal Matters (1978)

- 
- The Second Additional Protocol to the Council of Europe Convention on Mutual Assistance in Criminal Matters (2001)
  - The United Nations Convention against Transnational Organised Crime (Articles 13, 14, 18, 19 and 20) (2000)
  - The United Nations Convention against Corruption (Articles 46, 49, 50 and 54 to 57) (2003)

In relation to the gathering of electronic evidence, harmonizing laws and increasing cooperation across borders, Ireland is preparing to transpose into domestic legislation by February 2026 Directive 2023/1544 on laying down harmonised rules on the designation of designated establishments and the appointment of legal representatives for the purpose of gathering electronic evidence in criminal proceedings.

Regulation 2023/1543, concerning European Production Orders and European Preservation Orders for electronic evidence in criminal proceedings and execution of custodial sentences following criminal proceedings, will also be implemented into Irish law by August 2026. The ODPP is engaged in several international networks of prosecutors specialised in human trafficking, including:

- Eurojust Focus Group on Human Trafficking
- Eurojust Focus Group on Migrant Smuggling
- Council of Europe Network of Prosecutors on Migrant Smuggling
- McCain Institute Global Consortium of Prosecutors in Human Trafficking

Ireland also participates in joint investigation teams with other member States and signatories to the Budapest Convention through Europol and other organisations.

## Part II – Country-specific follow-up questions

### 40. Please provide information on measures taken in your country in respect to the following recommendations made in GRETA's previous reports:

- **ensure that legal assistance is provided systematically as soon as there are reasonable grounds for believing that a person is a victim of human trafficking, and that victims are appointed a lawyer with specialised knowledge to represent them in judicial and administrative proceedings, including to claim compensation;**

The Legal Aid Board generally receives referrals in from An Garda Síochána, notifying the Legal Aid Board that a person has been identified as a potential victim of trafficking.

Once a referral is received, it is very quickly assigned to a solicitor in the human trafficking unit and a file is opened. The solicitor makes contact, usually that same day, with the Health Service Executive Anti-Human Trafficking Team (HSE AHTT) or Tusla (if the new client is a minor) to arrange an initial consultation.

Since 2022, the Legal Aid Board has been holding a monthly clinic at the HSE AHTT offices. This was introduced as the HSE AHTT office is usually a more familiar environment for clients and thus a more appropriate setting in which to meet these vulnerable people. Clients are more comfortable there and their HSE AHTT caseworker also attends these meetings for support. The Legal Aid Board also regularly facilitates consultations outside of this monthly clinic for clients who are not able to attend certain dates or who have urgent issues to be addressed. The Legal Aid Board also facilitates remote consultations for clients who are not able to travel to Dublin. The Legal Aid Board arranges an interpreter if required for these consultations and requests a female or male interpreter as appropriate. The Legal Aid Board has recruited a new solicitor to the human trafficking unit, who has been able to dedicate more time to the case load.

Where there is a personal injury matter then this will be referred to our own personal injury unit within the Board. We made such a referral in one case during 2024.

The Legal Aid Board provides advice on seeking compensation, where relevant. The compensation scheme covers financial losses such as direct expenses or lost earnings. Clients rarely satisfy these conditions and the Legal Aid Board did not have any appropriate cases in which to provide advice on compensation in.

- **take steps to strengthen the criminal justice response to human trafficking and ensure that human trafficking offences for different forms of exploitation are proactively and promptly investigated, and that prosecutions lead to effective, proportionate and dissuasive sanctions;**

The Criminal Law (Human Trafficking) Act 2008 and the Criminal Law (Human Trafficking) (Amendment) Act 2013 govern the area of human trafficking in this jurisdiction. This legislation has now been augmented by the introduction of the Criminal Justice (Sexual Offences and Human Trafficking) Act 2024. This new act

enshrines in legislation, for the first time in this jurisdiction, the revised National Referral Mechanism (NRM) and allows other state agencies and 'Trusted partners' in addition to An Garda Síochána, to recognise Victims of Human Trafficking. It is envisaged that this revised NRM created by the legislation will result in the identification of more victims of Human Trafficking and allow all agencies including An Garda Síochána to tackle the heinous crime of human trafficking.

Where human trafficking is discovered by An Garda Síochána, particular emphasis is placed on identification of victims and prioritising their removal from circumstances of vulnerability, control and threat imposed by those who have engaged in the criminal offences concerned.

An Garda Síochána undertakes a significant role in attempting to achieve the aims of the Third National Action Plan to Prevent and Combat Human Trafficking launched by the Minister for Justice in 2023. The National Action Plan involves a victim-centred and human-rights-based approach with the ultimate aim of preventing human trafficking, ensuring an effective criminal justice response and delivery of supports to victims. The Third National Action Plan to Prevent and Combat Human Trafficking runs from 2023 to 2027.

In [DPP v Edosa & Anor \[2023\] IECA 38](#), following a trial at Mullingar Circuit Criminal Court which lasted 25 days, Ms. Alicia Edosa and Ms. Edith Enoghaghase were convicted of various offences. They were each convicted of two counts of trafficking of persons other than children contrary to s.4(1) and (7) of the Criminal Law (Human Trafficking) Act 2008, as well as one count of organisation of prostitution contrary to s. 9 of the Criminal Law (Sexual Offences) Act 1993. Ms. Edosa was convicted of 34 counts of money laundering contrary to s.7 of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, while Ms. Enoghaghase was convicted of four counts thereof.

Ms. Edosa appealed against conviction, while Ms. Enoghaghase appealed against severity of sentence, having withdrawn an appeal against conviction. The Director of Public Prosecutions sought to review the sentences imposed in each case on grounds of undue leniency. Ms. Edosa received an effective sentence of five years and eight months imprisonment, while Ms. Enoghaghase received one of five years and one. On appeal the sentences were increased to 7.5 years for Ms. Edosa, and 7 years and 1 month for Ms. Enoghaghase. The Court of Appeal sent an unequivocal message of intolerance and deterrence to those engaged in trafficking of people.

- **finalise the introduction of a revised National Referral Mechanism which ensures multi-agency involvement in the identification of victims of trafficking and gives a formal role in the identification process to a series of frontline actors, including specialised NGOs and labour inspectors;**

#### [Criminal Justice \(Sexual Offences and Human Trafficking\) Act 2024](#)

Part 3 of the Act establishes a revised National Referral Mechanism (NRM) for the identification and support of victims of human trafficking. When commenced, it will make it easier for victims of trafficking to come forward, be identified and access services, accommodation, and support. The revised NRM provides for a more robust and streamlined response, encompassing additional competent authorities and trusted partners, a further role for key NGO stakeholders.

Under section 20 of the Act the following agencies will become competent authorities for the identification of victims of human trafficking:

- (a) the Garda Síochána
- (b) the Minister for Justice
- (c) the Minister for Children, Equality, Disability, Integration and Youth
- (d) the Minister for Social Protection
- (e) the Child and Family Agency
- (f) the Health Service Executive
- (g) the Workplace Relations Commission.

Under Section 21 of the Act, other relevant bodies may apply to the Minister for Justice to be designated as a trusted partner for the purpose of referring a suspected victim of human trafficking to the NRM. They will provide an alternative and trusted pathway to recognition by the NRM, the advantages being that many victims will find it easier to approach an NGO or other agency to seek protection. The priority of the new NRM is to ensure that as many victims as possible come forward to seek protection while providing a way for all agencies both State and civil society, to co-operate, share information about potential victims, identify those victims and facilitate access to services, accommodation and supports.

Section 22 makes provision for an NRM Operational Committee ('the Committee') with the competent authorities and trusted partners as members to be established. The Committee, as a multi-disciplinary team, will make decisions on the formal recognition of victims based on the recommendations of the individual competent authorities or authorised referral partners. The criteria for identification as a victim of human trafficking is provided for under Section 25 of the same Act.

Section 33 makes provision for an applicant whose application for identification as a victim of human trafficking is refused by the operational committee to appeal the decision and request the committee to arrange for his or her application to be reviewed by an appeals officer appointed by the Minister for Justice.

Implementing the Human Trafficking Action Plan to identify and safeguard victims of human trafficking effectively through the introduction of a new National Referral Mechanism is a Programme for Government commitment.

Discovery and Implementation planning for the revised National Referral Mechanism are now underway within the Department of Justice, Home affairs and Migration. We are mapping existing process, identifying gaps and working towards a coordinated, practical framework that reflect both legal obligations and frontline realities.

Preparations include, assessing operational readiness across partners, resource scoping, establishing clear operational processes, training to ensure a victim centred assessment process and ensuring alignment to parallel reforms such as the EU Migration PACT.

- **guarantee effective access to compensation for victims of human trafficking, including by ensuring that non-pecuniary damages are eligible for compensation in criminal and civil proceedings as well as under the state compensation scheme.**

Section 7(1) of the [Criminal Justice \(Victims of Crime\) Act 2017](#) states that where a victim first contacts or is contacted by the Garda Síochána or the Ombudsman Commission in relation to an alleged offence, the Garda Síochána or the Ombudsman Commission, as the case may be, shall offer the victim information relating to the following

- (i) any scheme relating to compensation for injuries suffered as a result of a crime, and
- (j) the power of a court to make a compensation order under section 6 of the Act of 1993

Under Section 6 of the Criminal Justice Act 1993, a victim can avail of a court ordered Compensation Order requiring the convicted person to pay compensation in respect of any personal injury or loss resulting from the offence the individual was convicted of to any person who has suffered such injury or loss.

The Employment Permits (Amendment) Act, commenced 1<sup>st</sup> September 2024 provides that the Minister for Justice may take a civil action on the foreign national's behalf for compensation for work done or services rendered. This Act provides that it is a defence for the foreign national to the charge of having been 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 EU Anti-Trafficking Directive (2011/36/EU), Article 17 requires Ireland to ensure that '*victims of trafficking have access to existing schemes of compensation to victims of violent crimes of intent*'. Victims of trafficking, no matter what their nationality or location, have access to the non-judicial compensation avenue in the same manner as a citizen of the State. THB victims can file civil suits against trafficking offenders. It is also possible to initiate a civil claim for damages and compensation from their country of origin. General Damages and Special Damages can be awarded.

Victims have access to legal services regardless of their immigration status. There are no conditions to accessing legal aid by victims of human trafficking. Legal Aid available if victim is a party in civil proceedings. The Legal Aid Board's Human Trafficking Specialised Unit provides free legal assistance to victims of trafficking including provision of free legal advice in relation to information on compensation. Ireland's provision of compensation to all victims of crime, including victims of trafficking, is through the Scheme of Compensation for Personal Injuries Criminally Inflicted, administered by the Criminal Injuries Compensation Tribunal. Applications to the scheme are not dependent on residence status, nationality and, in the majority of cases, the nature of the offence.

State compensation does not depend on the outcome of the criminal case and/or the failure to obtain compensation from the offenders. Victims may seek compensation under both a civil action court order and the Tribunal's Scheme of Compensation. Criminal cases where a compensation order may be awarded may be taken regardless of the victim's participation or current jurisdiction. Persons who are legally employed in

the state may seek redress for loss of earnings and other employment rights breaches through the Workplace Relations Commission's adjudication service.

### **Awareness raising**

On 10 July 2024 the Criminal Injuries Compensation tribunal presented to the Victims Forum which is made up of frontline services that support victims. At this meeting Calling Cards with information on the Criminal Injuries Compensation Scheme (CICS) and a QR code were distributed in bulk to members to provide to clients. Feedback was invited from members as to other appropriate ways to promote the scheme, including additional languages to produce materials in.

In addition, work is being undertaken by the Victim Liaison Officers Network to streamline and reinforce the information given by each agency, including regarding CICS.

### **Asset Recovery and Confiscation Directive**

Unlike other countries, it is not common practice in Ireland for assets to be seized and victims to receive direct compensation from this. Traffickers tend not to have property in this jurisdiction to seize. However, through co-operation with Europol AP Asset Recovery, it has been possible to identify assets in other countries. Work is underway through existing structures and Mutual Legal Assistance agreements to support this.

Ireland opted in to the EU Directive on Asset Recovery and Confiscation. This Directive reached political agreement in December 2023 and confirmation of the final compromise text was received on the 12 January 2024. The Directive intends to establish minimum rules on the tracing and identification, freezing, confiscation and management of property in criminal matters.

There was no compensation awards made to victims of trafficking under the Criminal Injuries Compensation Scheme during the reporting period, albeit a number of claims relating to this offence remain to be finalised. However, there have been a number of cases before the Workplace Relations Commission. In 2024 Migrants Rights Centre Ireland supported 66 people who reported severe labour exploitation including 9 suspected trafficking situations.

## **41. Please provide information on developments in your country since GRETA's third evaluation report concerning:**

### **➤ emerging trends of trafficking in human beings;**

The predominant trend in Ireland is the predominance of Nigerians who (1) request to be identified and (2) are identified as victims of THB.

In 2024, in Ireland, 42% of all victims who were referred to An Garda Síochána for identification as victims of THB were Nigerian. In terms of positively identified cases of victims of THB, Nigerians accounted for 27% in 2022, 32% in 2023 and 57% in 2024. By contrast, other nationalities are typically represented by very low numbers, often one or two victims per year.

The numbers below include both victims who were trafficked to Ireland and those who were trafficked to countries other than Ireland and have presented in Ireland and were identified as victims of THB.

<b>Identified Victims of Trafficking</b>			
<b>Country</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
<b>Number of Nigerian victims of THB</b>	11	17	38
<b>Total number of victims of THB</b>	42	53	67
<b>% of Nigerians of total number of victims</b>	27%	32%	57%

The majority of victims of sexual exploitation in Ireland in 2024 were Nigerian. Of the 48 identified victims of sexual exploitation (adult and child combined), 34 were Nigerian. This trend was also evident in previous years, with 16 of 28 victims in 2023 and 11 of 24 in 2022 being Nigerian. Sexual exploitation accounted for the vast majority of trafficking cases involving Nigerian nationals. In 2024, 34 of the 38 Nigerian victims identified were trafficked for sexual exploitation; in 2023, the figure was 16 of 17; and in 2022, all 11 Nigerian victims were trafficked for this purpose.

<b>Identified Victims of Trafficking</b>			
<b>Country</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
<b>Nigeria</b>	11	17	38
<b>Romania</b>	3	6	2
<b>South Africa</b>	2	5	2
<b>Latvia</b>	4	4	2
<b>Vietnam</b>	3	2	2
<b>DR Congo</b>	1	2	
<b>China</b>	1	2	1
<b>Ukraine</b>	1	2	
<b>India</b>	1	2	2
<b>Kenya</b>	1	1	
<b>Nicaragua</b>	-	1	
<b>Albania</b>	-	1	2
<b>Bangladesh</b>	-	1	
<b>Pakistan</b>	1	1	
<b>Brazil</b>	-	1	4
<b>England</b>	-	1	
<b>Norway</b>	-	1	
<b>Czech Republic</b>	3	1	
<b>Zimbabwe</b>	2	1	2
<b>Sudan</b>	-	1	
<b>Turkey</b>	1		
<b>Ghana</b>	2		
<b>Somalia</b>	1		
<b>Iraq</b>	1		
<b>Uganda</b>	1		1

<b>Indonesia</b>			2
<b>Mauritius</b>			1
<b>Bulgarian</b>			1
<b>Slovakia</b>			1
<b>Zambia</b>			1
<b>Cameroon</b>			1
<b>Botswana</b>			1
<b>Ireland</b>	2		
<b>Morocco</b>			1
<b>Total</b>	<b>42</b>	<b>53</b>	<b>67</b>

A sizeable number of Human Trafficking victims enter via Ireland's northern border and we work closely with the Police Service Northern Ireland on cross co-operation. The sectors where victims of trafficking are encountered most frequently include prostitution, agriculture, forestry, beauty industry, domestic servitude, hospitality and retail.

The demographic of victims can vary depending on the exploitation type, for example, younger women would be the most common demographic for sexual exploitation, however, for other exploitation types this can vary to both older male and female victims.

The main drivers appear to be economic. However, social disadvantage and religious and social persecution are also seen as drivers, as is conflict. Pull factors include demand for cheap labour or demand for provision of sexual services, improved social position and expectation of employment.

With regard to methods, social media continues to be a core form of recruitment with vulnerable people targeted.

➤ **the legislation and regulations relevant to action against THB;**

[Criminal Law \(Sexual Offences and Human Trafficking\) Act 2024](#)

Criminal Law (Sexual Offences and Human Trafficking) Act 2024 puts the revised National Referral Mechanism (NRM) on a statutory footing. The revised NRM will enable victims of trafficking to seek assistance from bodies other than An Garda Síochána. With an increase in the number of competent authorities that a VOT can contact for assistance, it is anticipated that there will be an increase in the number of people applying to be recognised as VOTs.

Additional existing legislation and regulations are detailed below:

[Criminal Law \(Human Trafficking\) Act 2008](#)

The Criminal Law (Human Trafficking) Act 2008 introduced the crime of trafficking into Irish criminal law for the first time. This law was amended and expanded in 2013 to significantly broaden the scope of what is meant by exploitation and to define forced labour in line with international norms. In addition, laws on sexual exploitation have been strengthened with the Criminal Law (Sexual Offences) Act 2017. The 2008 Act

provides for penalties of, up to, life imprisonment and, at the discretion of the court, an unlimited fine for trafficking of persons for the purposes of labour or sexual exploitation or for the removal of a person's organs. The 2008 Act also builds on the Child Trafficking and Pornography Act 1998.

#### [Criminal Law \(Human Trafficking\) \(Amendment\) Act 2013](#)

The Criminal Law (Human Trafficking) (Amendment) Act 2013 amends the Act of 2008 and gives effect to EU Directive 2011/36/ EU on preventing and combating trafficking in human beings and protection of its victims. The Act

- broadens the scope of the definition of 'exploitation' in the 2008 Act to include exploitation consisting of forcing a person to engage in criminal activities (inside or outside the State)
- expands the definition of the term 'labour exploitation' to include forced begging
- for clarity, defines the term 'forced labour' in line with the definition based on that which is set out in International Labour Organisation (ILO) Convention No. 29 of 1930 on Forced or Compulsory Labour
- provides that where a trafficking offence (for sexual or labour exploitation) is committed by a public official during the performance of his/ her duties, that fact shall be treated as an aggravating factor for the purpose of determining sentence
- amends child evidence rules by increasing, from 14 to 18 years, the upper age threshold for out-of-court video recording of a complainant's evidence and makes provision for video recording the evidence of a child witness (other than an accused) who is under the age of 18 years.

#### [Criminal Law \(Sexual Offences\) Act 2017](#)

The Criminal Law (Sexual Offences) Act 2017 enhances and updates laws to combat the sexual exploitation and sexual abuse of children, including new offences relating to child sexual grooming and new and strengthened offences to tackle child pornography. The Act also criminalises the purchase of sexual services, including a specific offence of paying for sexual activity with a trafficked person, introduces new provisions regarding the giving of evidence by victims in sexual offence trials and introduces a new offence addressing public indecency.

#### [Child Trafficking and Pornography Act 1998](#)

The Child Trafficking and Pornography Act 1998 makes provision for trafficking of children for the purposes of sexual exploitation. The Criminal Law (Human Trafficking) Act 2008 amends the 1998 Act by amending the definition of a child to a person under the age of 18. It also raised the maximum penalty on conviction from 14 years to life imprisonment.

#### [Sexual Offences \(Jurisdiction\) Act 1996](#)

The Sexual Offences (Jurisdiction) Act 1996 allows for the prosecution of an Irish citizen, or a person ordinarily resident in the State, who commits an act in another country which is a sexual offence against a child in that other country and, if done within the State, would constitute a sexual offence against a child in the State. The penalties are a maximum of 5 years imprisonment on conviction on indictment.

#### [Criminal Justice Act 1999](#)

Under Section 41 of the Criminal Justice Act 1999, it is an offence to harm, threaten, menace, in any other way intimidate or frighten any person who is assisting An Garda Síochána in the investigation of an offence with the intention of causing the investigation or course of justice to be obstructed, interfered with or perverted.

#### [Criminal Justice \(Victims of Crime\) Act 2017](#)

The Criminal Justice (Victims of Crime Act) 2017 transposes Directive 2012/29/EU - the EU Victims' Rights Directive. The Act was passed into law in November 2017. The Act introduces, for the first time, statutory rights for all victims of crime, including victims of human trafficking. The legislation gives all victims of crime an entitlement to information about the system and their case and supports and special measures during investigation and court proceedings, if necessary.

#### [Domestic Violence Act 2018](#)

The Domestic Violence Act 2018 is an important piece of legislation, which was commenced on 1 January 2019 and represented a significant improvement in legal protections available to victims of Domestic Violence. The legislation enhanced the legislative measures available within the civil law system to support and protect victims including measures required to ratify the Istanbul Convention on preventing and combating violence against women and domestic violence. In the context of human trafficking, section 38 of the Act provided for a new criminal offence of forced marriage.

#### [Criminal Justice \(Smuggling of Persons\) Act 2021](#)

The Criminal Justice (Smuggling of Persons) Act 2021 serves to prevent and combat the smuggling of persons and, for those purposes, to facilitate cooperation with other states. It gave effect to Directive 2002/90/EC and Framework Decision 2002/946/JHA of 28 November 2002, defining the facilitation of unauthorised entry, transit and residence and strengthening the penal framework to prevent this. It also gave effect, in part, to the Protocol against the Smuggling of Migrants by Land, Sea and Air, supplementing the United Nations Convention against Transnational Organised Crime, made in New York on 15 November 2000, and repealed certain provisions of the Illegal Immigrants (Trafficking) Act 2000. Sections 11, 14 and 15 of the Act designate members of An Garda Síochána as 'enforcement officers' and grant them enforcement powers to detain a person who has been arrested under subsection (2)(a) and the power to detain vehicles if they suspect that one was used by a person arrested for an offence under section 6 or 7 for the purpose of the commission of the offence. They also use this Act as a point of reference when compiling files related to such offences.

#### [Criminal Justice Act 2006](#)

Section 72 of the Criminal Justice Act 2006 makes provision for participation in or facilitation of organised crime. Under this act, individuals who knowingly participate in or contribute to any activity of a criminal organisation that leads to the perpetration of an offence either within or outside the State (if doing so would constitute a serious offence if done in the State) are themselves guilty of an offence. Members of An Garda Síochána routinely draw on the provisions set out in this section of the Act to make arrests for human trafficking offences.

- **the institutional and policy framework for action against THB (co-ordinating bodies, specialised entities, national rapporteur or equivalent mechanism, involvement of civil society, public-private partnerships);**

The [Third National Action Plan to Prevent and Combat Human Trafficking 2023-2027](#) (the NAP) was launched in November 2023. The NAP builds on the progress achieved under the first and second action plans. The NAP outlines the priorities identified for a whole-of-Government response.

The actions in the NAP's implementation plan are arranged over the four pillars of prevention, protection, prosecution and, finally, partnership and policy. The actions ensure that the policy approach will be primarily victim focused.

The implementation of the actions contained within the NAP is monitored by the Department of Justice, Home Affairs and Migration. This is guided by the Human Trafficking Governance and Strategy Group comprising senior officials from Departments and Agencies and with relevant expert participation as appropriate. A Human Trafficking Oversight Group informs the work of the Governance and Strategy Group with representatives drawn from key agencies. These two groups are supported by the Human Trafficking Stakeholders' Forum, established by the Department of Justice and which comprises representatives from the community and voluntary sector and other expert stakeholders. In addition, a Labour Exploitation subgroup has evolved from the Human Trafficking Oversight Group to look specifically at emerging trends in labour exploitation.

The Health Service Executive (HSE) National Social Inclusion Office (NSIO) has established two governance structures to coordinate the implementation of HSE actions under the NAP - The HSE Human Trafficking Subgroup and the HSE Human Trafficking Training Working Group. These structures include membership from different areas of the HSE – including but not limited to:

- HSE National Social Inclusion Office
- Anti-Human Trafficking Team
- The Office of the Nursing and Midwifery Services Director (ONMSD)
- Sexual Assault Treatment Units (SATUs)
- Emergency Medicine Programme
- Sexual Health and Crisis Pregnancy Programme
- Public Health
- Civil Registration Service
- National Women and Infants Health Programme
- Acute Hospital Service
- the National Safeguarding Office

Within An Garda Síochána, The Human Trafficking Investigation and Co-ordination Unit (HTICU) operates to combat human trafficking. The unit engages in wide consultation with a number of agencies including Customs, State Agencies such as the Health Service Executive (HSE), the Workplace Relations Commission (WRC), and NGOs such as Ruhama, the Migrant Rights Centre of Ireland (MRCI), the Immigrant Council of

Ireland (ICI), the International Organisation of Migration (IOM) and Doras. The unit's role includes the following:

- assuming national responsibility for policy development, the co-ordination and implementation of policing methods and the management and co-ordination of investigations within the unit and with divisions throughout the country
- providing advice, support and, where necessary, operational assistance to investigations undertaken at District level
- working in partnership with Organised Prostitution Investigation Unit (OPIU) in the investigation of trafficking in human beings for the purposes of sexual exploitation
- delivery of training and awareness to An Garda Síochána on all aspects of trafficking in human beings

The Workplace Relations Commission (WRC) is an independent, statutory body which was established on 1<sup>st</sup> October 2015 under the Workplace Relations Act 2015 (No. 16 of 2015). The Commission's core services include the inspection of employment rights compliance, the provision of information, the processing of employment agency and protection of young persons (employment) licences and the provision of mediation, conciliation, facilitation and advisory services.

The National Rapporteur is The Irish Human Rights and Equality Commission (IHREC).

- **the current national strategy and/or action plan for combating trafficking in human beings (objectives, main activities, budget, bodies responsible for the implementation, monitoring and evaluation of results);**

The Third National Action Plan to Prevent and Combat Human Trafficking 2023-2027 was launched in November 2023. Key actions include:

- Establishment of a new National Referral Mechanism which will make it easier for victims to come forward, be identified and access support. It will ensure that victims can come forward to a range of agencies and not just An Garda Síochána, as is currently the case. This is in recognition of the fact victims may, due to experiences in their own countries, not trust police services.
- New and widespread training for all who may come into contact with victims of human trafficking across Departments and State agencies. This will include the Border Management Unit of the Department of Justice, as well as health and social care professionals, professionals in contact with children and working on child-related matters, and Civil Registration Services staff working in the HSE.
- Ongoing development of training through NGOs targeting front line staff in industries such as hospitality, airline and shipping who may come into contact with trafficked persons.
- Ensuring effective anti-trafficking screening measures are in place at point of entry to the State.
- Establishing dedicated accommodation for victims of trafficking ensuring that victims of trafficking for sexual exploitation are provided with gender-specific accommodation.

➤ **recent case-law concerning THB for different forms of exploitation.**

The case of Alicia Edosa and Edith Enoghaghase [2023] IECA 38, mentioned above in response to Question 40, involved an appeal of both conviction and sentence. The Court of Appeal addressed the proofs required for a human trafficking offence. The first labour exploitation cases in Ireland are due to be heard later this year.

### Part III - Statistics on THB

**42. Please provide the following statistics, per year starting with 2022, where available disaggregated as indicated below:**

- **Number of presumed victims and identified victims of THB in the sense of having been recognised by a state institution or mandated NGO as bearers of rights to services provided for by the Convention (with breakdown by sex, age, nationality, form of exploitation, internal or transnational trafficking, and body which identified them).**

All Victims of Human Trafficking are offered services and assistance under the national referral mechanism. An Garda Síochána is currently the sole competent authority for the identification of victims of THB.

**Victims of THB - Disaggregated by sex and age:**

	2022			2023			2024		
	Female	Male	TOTAL	Female	Male	TOTAL	Female	Male	TOTAL
<b>Adult</b>	23	14	37	38	10	48	42	15	57
<b>Child</b>	4	1	5	4	1	5	8	2	10
<b>TOTAL</b>	27	15	42	42	11	53	50	17	67

**Victims of THB - Disaggregated by form of exploitation :**

Year	Sexual Exploitation	Labour Exploitation	Forced Criminality	Other (both Forced Criminality and Sexual Exploitation)	Total
<b>2022</b>	24	15	2	1	42
<b>2023</b>	28	16	7	2	53
<b>2024</b>	48	15	4	0	67

**Victims of THB - Disaggregated by nationality:**

2022	Adult					Child				Total
	Forced Criminality	Labour	Organ Removal	Sexual	Total	Forced Criminality	Labour	Sexual	Total	
Chinese		1			1					1
Congolese				1	1					1
Czech		3			3					3

Ghanaian		2			2				2
Indian		1			1				1
Iraqi				1	1				1
Ireland							2	2	2
Kenyan				1	1				1
Latvian		4			4				4
Nigerian				11	11				11
Pakistani				1	1				1
Romanian		2			2		1	1	3
Somalian				1	1				1
South African				2	2				2
Turkish		1			1				1
Ugandan			1		1				1
Ukrainian							1	1	1
Vietnamese	1				1	1	1	2	3
Zimbabwean				2	2				2
<b>Grand Total</b>	<b>1</b>	<b>14</b>	<b>1</b>	<b>20</b>	<b>36</b>	<b>1</b>	<b>1</b>	<b>4</b>	<b>42</b>

2023	Adult				Child			Total
	Forced Criminality	Labour	Sexual	Total	Forced Criminality	Sexual	Total	
Albanian			1	1				1
Bangladeshi		1		1				1
Brazilian		1		1				1
Chinese		2		2				2
Congolese			1	1		1	1	2
Czech		1		1				1
English		1		1				1
Indian		2		2				2
Kenyan			1	1				1
Latvian		4		4				4
Nicaraguan		1		1				1
Nigerian	1		15	16		1	1	17
Norwegian			1	1				1
Pakistani		1		1				1
Romanian	3		1	4	2		2	6
South African	1		4	5				5
Sudanese		1		1				1
Ukrainian		1	1	2				2
Vietnamese	1			1	1		1	2
Zimbabwean			1	1				1
<b>Grand Total</b>	<b>6</b>	<b>16</b>	<b>26</b>	<b>48</b>	<b>3</b>	<b>2</b>	<b>5</b>	<b>53</b>

<b>2024</b>	<b>Adult</b>				<b>Child</b>				<b>Total</b>
<b>Row Labels</b>	<b>Forced Criminality</b>	<b>Labour</b>	<b>Sexual</b>	<b>Total</b>	<b>Forced Criminality</b>	<b>Labour</b>	<b>Sexual</b>	<b>Total</b>	
Nigerian	1	1	28	30		2	6	8	38
Brazilian	1	1	2	4					4
Romanian		1	1	2					2
Vietnamese		1		1	1			1	2
Albanian	1		1	2					2
Indian		2		2					2
South African			1	1			1	1	2
Indonesian		2		2					2
Zimbabwean			2	2					2
Latvian		1	1	2					2
Zambian			1	1					1
Ugandan			1	1					1
Cameroon			1	1					1
Botswanan		1		1					1
Chinese		1		1					1
Bulgarian			1	1					1
Moroccan			1	1					1
Slovakian		1		1					1
Mauritian		1		1					1
<b>Grand Total</b>	<b>3</b>	<b>13</b>	<b>41</b>	<b>57</b>	<b>1</b>	<b>2</b>	<b>7</b>	<b>10</b>	<b>67</b>

➤ **Number of victims of THB identified as part of the asylum procedure (disaggregated by sex, age, nationality, form of exploitation).**

Currently, An Garda Síochána is the sole competent authority for the identification of victims of THB .

The International Protection Office (IPO) and the International Protection Accommodation Services (IPAS) have referred suspected victims to An Garda Síochána. An Garda Síochána has regular contact with the IPO and IPAS in respect of suspected trafficking victims.

While IPO and IPAS may notify An Garda Síochána when an International Protection applicant claims, as part of their application for International Protection, to have been a victim of THB the IPO is not a competent authority and cannot designate a person as a victim of THB.

The data from IPO on the number of people who claim, as part of their application for International Protection, to have been a victim of THB will not correlate to the data from An Garda Síochána of identified victims of THB who had been referred to them by IPO for example:

- A victim of THB may have been recognised as meeting the indicators of Human Trafficking during the asylum procedure but then not given consent to engage with An Garda Síochána.
- A victim of THB may have been recognised as meeting the indicators of Human Trafficking during the asylum procedure but have already been referred to An Garda Síochána by another NGO or have self referred to An Garda Síochána themselves, in which case IPO / IPAS would not be the referrer.

Of the 67 victims of trafficking identified in Ireland in 2024, 22 were referred by the International Protection Office and one was referred by International Protection Accommodation Services.

➤ **Number of victims of THB who received assistance (disaggregated by sex, age, nationality, form of exploitation, internal or transnational trafficking).**

All identified victims of THB receive assistance. For data, please see answer to Question 42 above.

➤ **Number of child victims of THB who were appointed legal guardians.**

Any victim of trafficking under the age of 18 years is referred to as a child victim. All child victims are appointed Tusla workers. As can be seen in the chart below - which shows the break-down of child to adult victims of THB - from 2022 to 2024, 20 child victims of THB were identified in Ireland.

Year	Child	Adult	Total
2022	5	37	43
2023	5	48	53
2024	10	37	67

➤ **Number of victims of THB granted a recovery and reflection period (disaggregated by sex, age, nationality, form of exploitation).**

All identified victims of THB are granted a recovery and reflection period. For data, please see answer to Question 42 above.

➤ **Number of victims of THB granted a residence permit, with an indication of the type of the permit (for the purpose of co-operation in the investigation/proceedings, on personal grounds, other) and its duration (disaggregated by sex, age, nationality, form of exploitation).**

Any identified victims of trafficking in human beings (THB) who do not already hold a current immigration permission or have an ongoing international protection application, and who are cooperating with An Garda Síochána's investigation, may be granted a residence permission at the request of An Garda Síochána. In practice, this has been done through the granting of a Stamp 4 permission for an initial period of six months, which can be extended upon request.

➤ **Number of persons given refugee status or subsidiary/complementary protection on the grounds of being victims of THB (disaggregated by sex, age, nationality, form of exploitation).**

In Ireland, the International Protection Office (IPO) assesses each application on an individual basis, taking into account the applicant's full personal circumstances, including any experiences of trafficking, but also broader risk factors and country-of-origin information.

Being a victim of trafficking in itself does not automatically confer entitlement to refugee or subsidiary protection status under Irish or EU law. Instead, the IPO evaluates whether the applicant meets the definition of a refugee under the 1951 Geneva Convention or qualifies for subsidiary protection under Directive 2011/95/EU (the Qualification Directive), based on risk of serious harm upon return.

This approach is consistent with guidance from UNHCR and the EU Anti-Trafficking Directive (2011/36/EU), both of which emphasise that trafficking should be considered as part of the overall protection needs assessment, particularly where return would expose the individual to a real risk of re-trafficking or serious harm. However, protection status is granted only where the legal thresholds for refugee or subsidiary protection are met.

➤ **Number of victims of THB who claimed compensation, who were granted compensation and who effectively received compensation (disaggregated by sex, age, nationality, form of exploitation, with an indication of whether the compensation was provided by the perpetrator or the State, and the amount awarded).**

There were no compensation awards made to victims of trafficking under the Criminal Injuries Compensation Scheme during the reporting period, albeit a number of claims relating to this offence remain to be finalised. However, there have been a number of cases before the Workplace Relations Commission. In

2024, Migrants Rights Centre Ireland supported 66 people who reported severe labour exploitation including 9 suspected trafficking situations.

➤ **Number of victims of THB who received another form of financial support from the State, with the indication of the amount received.**

All Victims of Trafficking are entitled to state supports. For data, please see answer to Question 42 above.

➤ **Number of victims of THB who received free legal aid.**

The figures below have been provided by the Legal Aid Board.

YEAR	NEW REFERRALS
2022	27
2023	38
2024	35

➤ **Number of victims of THB who were returned or repatriated to/from your country (disaggregated by sex, age, country of destination, form of exploitation).**

In order to protect the anonymity of the victims of THB who have been returned/repatriated we are not specifying the country of return.

Year	Number	Sex	Age	Form of Exploitation	Type of Support
<b>2022</b>	No returns for this year				
<b>2023</b>	1	Female	25 33	Sexual exploitation	Return and reintegration
<b>2023</b>	1	Female	33	Sexual exploitation	Return and reintegration
<b>2024</b>	1	Female	31	Both Sexual and labour exploitation	Return and reintegration
<b>2024</b>	1	Female	34	Both Sexual and labour exploitation	Return and reintegration

We are not aware of any victims of THB being repatriated to Ireland.

➤ **Number of investigations into THB cases (disaggregated by type of exploitation, with an indication of the number of victims concerned).**

The chart below shows the number of THB cases recognised by An Garda Síochána. An Garda Síochána conduct investigations on all identified THB cases. An Garda Síochána is the sole competent authority for the identification of victims of THB.

Year	TYPE OF EXPLOITATION				Total
	Sexual Exploitation	Labour Exploitation	Forced Criminality	Other (both Forced Criminality and Sexual Exploitation)	
2022	24	15	2	1	42
2023	28	16	7	2	53
2024	48	15	4	0	67

➤ **Number of prosecutions in THB cases (disaggregated by type of exploitation, with an indication of the number of victims and defendants concerned).**

**2022:** 13 victims in total, 10 sexual exploitation and 3 labour exploitation.

- 9 individuals prosecuted in total (5 new prosecutions, 4 ongoing prosecutions).
- 7 individuals prosecuted for trafficking for the purpose of sexual exploitation.
- 2 individuals prosecuted for trafficking for the purpose of labour exploitation.

**2023:** 18 victims in total, 11 sexual exploitation and 7 labour exploitation

- 11 individuals prosecuted in total (2 new prosecutions, 9 ongoing prosecutions).
- 7 individuals prosecuted for trafficking for the purpose of sexual exploitation.
- 4 individuals prosecuted for trafficking for the purpose of labour exploitation.

**2024:** 23 victims in total, 10 sexual exploitation and 13 labour exploitation.

- 16 individuals prosecuted in total (8 new prosecutions, 8 ongoing prosecutions).
- 4 individuals prosecuted for trafficking for the purpose of sexual exploitation.
- 4 individuals prosecuted under non-trafficking laws related to investigations of trafficking for the purpose of sexual exploitation.
- 6 individuals prosecuted for trafficking for the purpose of labour exploitation.
- 2 individuals prosecuted under non-trafficking laws related to investigations of trafficking for the purpose of labour exploitation.

➤ **Number of convicted perpetrators of THB (disaggregated by sex, age, nationality, form of exploitation)**

**2022:** 0 convictions.

**2023:** 4 total convictions.

- 1 Irish male convicted of trafficking for the purpose of sexual exploitation.
- 2 Nigerian women convicted in 2021 for trafficking for the purpose of sexual exploitation had their convictions upheld on appeal.
- 1 Brazilian woman was prosecuted for trafficking for the purpose of sexual exploitation and convicted for offences of organised prostitution and money laundering. The trafficking charges were withdrawn after witness difficulties.

**2024:** 6 total convictions.

- 1 Irish male (referenced above) was convicted in 2023 for trafficking a child for the purpose of sexual exploitation. The accused was sentenced to 13 years imprisonment, with the final year suspended.
- 1 Nigerian male was convicted for three counts of conspiracy to commit human trafficking. The accused was sentenced in March 2025 to 4.5 years imprisonment.
- 1 Brazilian woman was prosecuted for trafficking an adult for the purpose of sexual exploitation. The trafficking charges were withdrawn after witness difficulties. The accused was convicted of money laundering offences and received a sentence of 4 years imprisonment, with the final 2 years suspended.
- 1 Romanian male was prosecuted for trafficking an adult for the purpose of sexual exploitation. The accused was convicted of harassment, with a jury unable to reach a verdict on the trafficking offences. The accused has since been convicted of trafficking in 2025 and is awaiting sentence.
- 1 Brazilian male was prosecuted in relation to a previous investigation of trafficking an adult for the purpose of sexual exploitation. The accused was convicted for offences of organised prostitution, brothel keeping, money laundering, deception, using a false instrument, and an unrelated offence of possession of child pornography. The accused received a sentence of 10.5 years imprisonment with the final 18 months suspended.
- 1 Irish male was prosecuted in relation to a previous investigation of trafficking of an adult for the purpose of sexual exploitation. The accused was convicted for offences of rape and received a sentence of 20 years imprisonment with the final 2 years suspended.

\* The case management system does not provide details pertaining to the age of the offender at the time of conviction.

➤ **Number of convictions for THB, with an indication of the form of exploitation, whether the victim was adult or child, the type and duration of the penalties, and whether they were effectively enforced or suspended.**

This information, where available, has been included under the previous heading.

➤ **Number of judgments in THB cases resulting in the confiscation of assets.**

There have been no judgments resulting in the confiscation of assets. However, we currently have one case confiscation proceedings are ongoing, with a freezing order obtained over assets belonging to the accused. As the confiscation proceedings are ongoing it is not possible to provide any more details.

➤ **Number of convictions of legal entities for THB.**

No legal entities have been prosecuted or convicted for trafficking in this jurisdiction