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**ANTI-CED_{MALTA}
TRAFFICKING**

NATIONAL STRATEGY AND ACTION PLAN ON COMBATTING TRAFFICKING IN HUMAN BEINGS IN MALTA (2024-2030)



GOVERNMENT OF MALTA
PARLIAMENTARY SECRETARIAT
FOR REFORMS AND EQUALITY

**HUMAN
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DIRECTORATE**



NATIONAL STRATEGY AND ACTION PLAN **ON COMBATTING TRAFFICKING IN HUMAN BEINGS IN MALTA** (2024-2030)

as adopted by the
Human Trafficking Monitoring Committee
and the Inter-Ministerial Committee
on 8 July 2024

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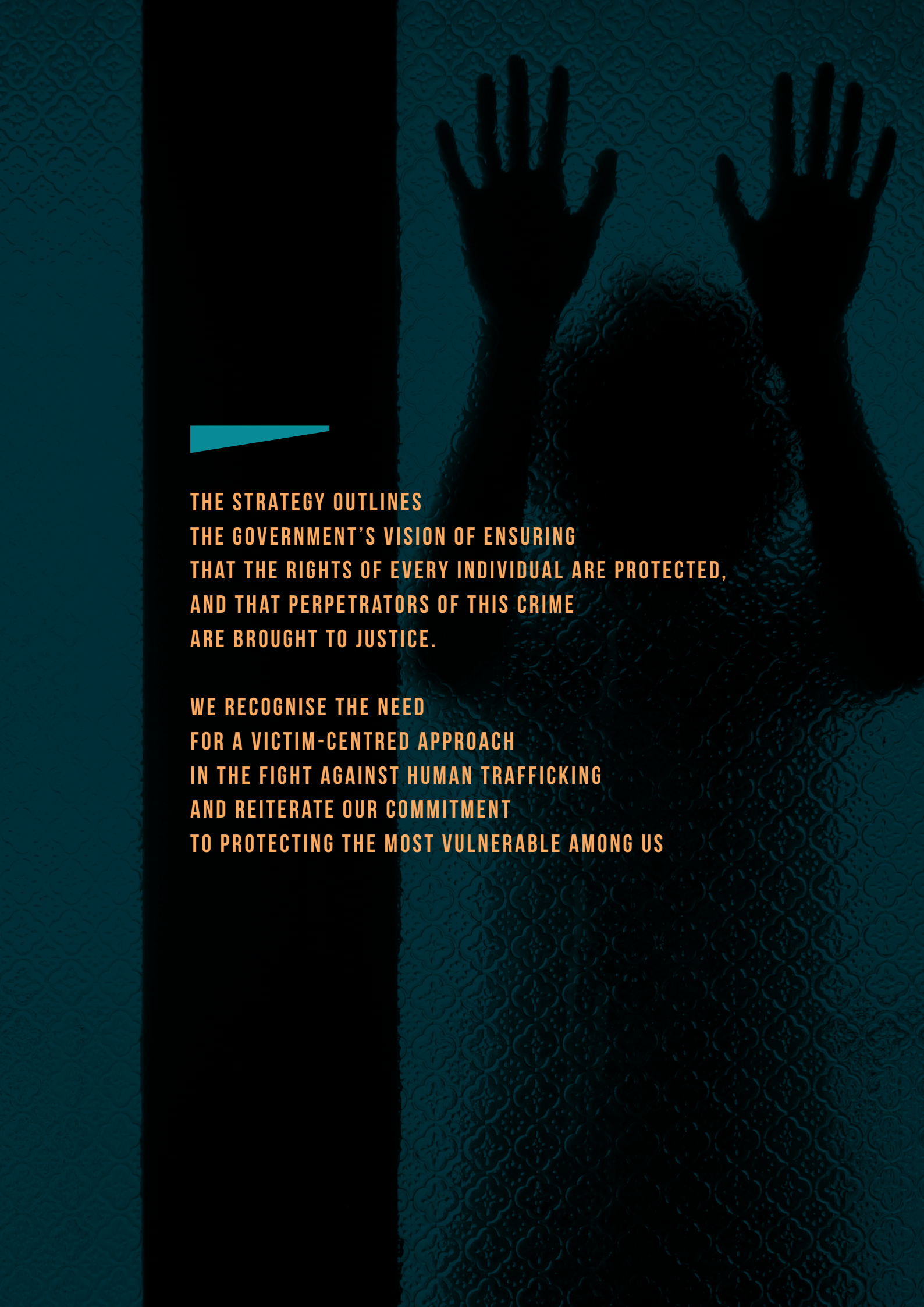
CONTENTS

MESSAGE FROM THE HON. REBECCA BUTTIGIEG, PARLIAMENTARY SECRETARY FOR EQUALITY AND REFORMS.....	7
1. INTRODUCTION	8
2. BACKGROUND	10
3. PROCESS OF DEVELOPING THE STRATEGY	18
4. MISSION AND LEADING PRINCIPLES	20
5. ADDED VALUE OF THE STRATEGY	22
6. IMPLEMENTATION, MONITORING AND EVALUATION	23
7. NATIONAL STRATEGIC FRAMEWORK 2024-2030.....	25
8. NATIONAL ACTION PLAN FOR YEARS 1, 2, 3 AND 4 2024-2027	41

ABBREVIATIONS

AGO	Attorney General Office
ARB	Asset Recovery Bureau
AWAS	Agency for the Welfare of Asylum Seekers
CC	Criminal Code
CGBVDV	Commission on gender-based Violence and Domestic Violence
CJLA WG	Criminal Justice and Legislative Amendments Working Group
CPN	Child Protection Network (MHA, MEYR, MHSE/MPF, MSPC/CPS)
CSA	Court Services Agency
DIER	Department of Industrial and Employment Relations
EU	European Union
FIAU	Financial Intelligence Analysis Unit
FSWS	Foundation for Social Welfare Services
GRETA	Council of Europe Group of Experts on Action against Trafficking in Human Beings
HRD	Human Rights Directorate
HRIU	Human Rights Initiatives Unit
HTMC	Human Trafficking Monitoring Committee
ICAT	Inter-Agency Co-ordination Group against Trafficking in Persons
IMC	Anti-Human Trafficking Inter-Ministerial Committee
IPA	International Protection Agency
JRS	Jesuit Refugee Service Malta
MAFA	Ministry for Agriculture, Fisheries and Animal Rights
MCA	Malta Communication Authority
MCCAA	Malta Consumer and Competition Affairs Authority
MEEP	Ministry for the Economy, Enterprise and Strategic Projects
MEER	Ministry for the Environment, Energy and Regeneration of the Grand Harbour
MEYR	Ministry for Education, Sport, Youth, Research and Innovation
MFET	Ministry for Foreign and European Affairs and Trade
MFIN	Ministry for Finance
MGP	Ministry for Gozo and Planning
MHA	Ministry for Health and Active Ageing
MHAL	Ministry for the National Heritage, the Arts and Local Government
MHSE	Ministry for Home Affairs, Security and Employment
MIV	Ministry for Inclusion and the Voluntary Sector
MJR	Ministry for Justice and Reform of the Construction Sector
MLI	Ministry for Lands and the Implementation of the Electoral Programme
MoU	Memorandum of Understanding

MPF	Malta Police Force
MSA	Malta Statistics Authority
MSAA	Ministry for Social and Affordable Accommodation
MSPC	Ministry for Social Policy and Children's Rights
MTIP	Ministry for Transport, Infrastructure and Public Works
MTP	Ministry for Tourism and Public Cleanliness
NAP	National Action Plan
NGO	Non-governmental Organisation
NREM	National Rapporteur or Equivalent Mechanism
NRM	National Referral Mechanism
NRM Team	National Coordinator, Stakeholders and Staff
NSO	National Statistics Office
OPM-EES	Office of the Prime Minister, European Funds, Equality, Reforms and Social Dialogue
SDGs	Sustainable Development Goals
SL	Subsidiary Legislation
SWOT	Strengths, Weaknesses, Opportunities and Threats
THB	Trafficking in Human Beings
TIP	Trafficking in persons
TSI	Technical Support Instrument
UM	University of Malta
VCA	Victims of Crime Act
VSA	Victim Support Agency
WGs	Working Groups

The background of the entire page is a dark teal color with a repeating, intricate geometric pattern. On the right side, there is a large, dark silhouette of a person's arms and hands raised, palms facing forward, against the patterned background. On the left side, there is a solid black vertical bar. A small, light blue trapezoidal shape is positioned to the left of the first text block.

**THE STRATEGY OUTLINES
THE GOVERNMENT'S VISION OF ENSURING
THAT THE RIGHTS OF EVERY INDIVIDUAL ARE PROTECTED,
AND THAT PERPETRATORS OF THIS CRIME
ARE BROUGHT TO JUSTICE.**

**WE RECOGNISE THE NEED
FOR A VICTIM-CENTRED APPROACH
IN THE FIGHT AGAINST HUMAN TRAFFICKING
AND REITERATE OUR COMMITMENT
TO PROTECTING THE MOST VULNERABLE AMONG US**



MESSAGE FROM THE HON. REBECCA BUTTIGIEG, PARLIAMENTARY SECRETARY FOR EQUALITY AND REFORMS

Human trafficking is a global issue that transcends international borders. It violates fundamental rights and freedoms and affects millions of people across the world, regardless of age, gender, or nationality. Over the recent years, Malta has made significant efforts to address human trafficking, however, more work needs to be done to effectively combat this crime. In this context, it is with great pleasure that Malta launches its first National Strategy on Combatting Trafficking in Human Beings in Malta.

This document has been drafted with the aim of setting up the necessary national framework required to prevent human trafficking, protect victims, and prosecute offenders of this crime. Assistance from the Council of Europe and the European Commission has been pivotal in ensuring that this Strategy and its objectives are in line with international standards.

The Strategy outlines the Government's vision of ensuring that the rights of every individual are protected, and that perpetrators of this crime are brought to justice. We recognise the need for a victim-centred approach in the fight against human trafficking and reiterate our commitment to protecting the most vulnerable among us. This can only be achieved through the solidified collaboration of key stakeholders within the government, the private sector and civil society. Human rights remain at the forefront of this document, with the implementation of this Strategy to take on a gender-specific, non-discriminatory, and sustainable approach to combatting human trafficking.

The public has an important role to play in the fight against this crime and I urge you all to stay informed and report any suspicious activity. Together, we can foster a society where every individual can live free from exploitation and ensure that Malta becomes a beacon of hope in the fight against human trafficking.

1. INTRODUCTION

Trafficking in human beings (THB) is a global criminal phenomenon that does not respect borders and demands a coordinated national and international response. It is also one of the most pressing and complex human rights challenges of our age. As stated in the Preamble of the Council of Europe Convention on Action against Trafficking in Human Beings (hereinafter the 'Anti-Trafficking Convention'), trafficking in human beings constitutes a violation of human rights and an offence to the dignity and the integrity of the human being. The human rights-based approach to action against THB requires States to set up a comprehensive framework for the prevention of THB, the protection of trafficked persons as victims of a serious human rights violation, and the effective investigation and prosecution of traffickers.

Recognising the magnitude of this issue, European countries continue to strengthen their mechanisms and actions to counteract the spread and impact of THB. This is done particularly under the umbrella of the Council of Europe Anti-Trafficking Convention and the EU Directive 2011/36/EU on Preventing and Combatting Trafficking in Human Beings and Protecting its Victims.¹ The Strategy on Combatting Trafficking in Human Beings of the European Union (2021-2025) calls on governments to continue to identify victims, and develop protection and prevention responses as well as robust, effective, and evidence-based investigations and prosecutions of THB cases. The key way for States to achieve this is through partnerships and collaboration with a wide range of stakeholders both within and outside their country.

Since 2008, Malta has been a Party to the Council of Europe Anti-Trafficking Convention. In line with the requirements of the Convention, State Parties must adopt a coordinated and multidisciplinary approach, incorporating the prevention of THB, the protection of victims' rights and the prosecution of traffickers. The Convention contains various provisions in each of these three areas, placing obligations on States to take appropriate measures, in partnership with civil society and in co-operation with other States. The Convention provides for a series of rights for victims of trafficking, in particular the right to be identified as a victim, to be granted a renewable residence permit, and to receive compensation for damages suffered.


The Council of Europe Group of Experts on Action against Trafficking in Human Beings (GRETA), which monitors the implementation of the Anti-trafficking Convention, has conducted three evaluation rounds of Malta. The third evaluation, focusing on trafficking victims' access to justice and effective remedies, took place in 2020 and GRETA's third report on Malta was published in November 2021.² According to this report, the national anti-trafficking legislation and policies have evolved, and the main anti-trafficking institutions have been further strengthened.

Since 2020 the Human Rights Initiatives Unit (HRIU) within the Human Rights Directorate (HRD) under the Office of the Prime Minister, European Funds, Equality, Reforms and Social Dialogue (OPM-EES), has been entrusted to lead the reform of the anti-trafficking system and policy and to streamline co-ordination with ministries, national authorities, social partners, non-governmental organisations and other stakeholders.

¹ The Directive of the European Parliament and of the Council amending Directive 2011/36/EU on Preventing and Combating Trafficking in Human Beings and Protecting its victims was adopted on 27 May 2024 by the Council of the European Union and will enter into force on the twentieth day following its publication on the EU Official Journal.

² See GRETA's third report on Malta, paragraphs 15-26.

In this context, the HRD has led the development of a new National Anti-Trafficking Strategy (hereinafter “the Strategy”) for 2024-2030 that will equip Malta with more effective tools for the prevention of THB, the protection of victims of trafficking and the prosecution of offenders. The National Strategy on Gender-Based Violence and Domestic Violence 2023-2028, developed and led by the Commission for Domestic Violence and Gender-Based Violence, also provides a measure which refers explicitly to the need to “develop a strategy to address human trafficking, addressing issues related to forced prostitution and exploitation for sexual purposes as a crime”. The National Anti-Trafficking Strategy will contribute to strengthening a human rights-based, gender and child-sensitive, interdisciplinary, and cross-sectoral approach to combatting THB, developing a system for the early identification of victims, and the provision of timely assistance to victims and their access to justice, including compensation.



**THE STRATEGY ON COMBATTING TRAFFICKING
IN HUMAN BEINGS OF THE EUROPEAN UNION (2021-2025)
CALLS ON GOVERNMENTS TO CONTINUE TO IDENTIFY VICTIMS,
AND DEVELOP PROTECTION AND PREVENTION RESPONSES
AS WELL AS ROBUST, EFFECTIVE, AND EVIDENCE-BASED
INVESTIGATIONS AND PROSECUTIONS OF THB CASES**

2. BACKGROUND

2.1 LEGAL FRAMEWORK

Malta has, overall, an adequate domestic legislative framework for combatting trafficking in human beings, comprising:

- **The Criminal Code (CC)** - Chapter 9 of the Laws of Malta - which criminalises THB and which was subject to important legislative reforms in accordance with the Council of Europe Anti-Trafficking Convention.³
- **The White Slave Traffic (Suppression) Ordinance**, Chapter 63 of the Laws of Malta 1930 criminalises forced prostitution. It is still applicable to trafficking in human beings and overlaps with the CC with regards to sexual exploitation, even if both laws have their own specificities. The CC is the instrument to be used to prosecute traffickers.
- **Subsidiary Legislation (S.L.) 217.07** which transposes into Maltese law EU Directive 2004/81/EC on the residence permit issued to third-country nationals who are victims of trafficking in human beings or who have been the subject of an action to facilitate illegal immigration, who cooperate with the Principal Immigration Officer in the fight against trafficking of human beings, which permission shall be renewable if and while the conditions stipulated in SL 217.07 continue to subsist. It establishes that victims of trafficking or illegal immigrants who co-operate with the Principal Immigration Officer may obtain permission to reside in Malta for a period of six months. This legislation also provides for a reflection period to victims of trafficking, to give them the opportunity to detach themselves from the influence of the perpetrators and enable them to make an informed decision on whether to co-operate with the Principal Immigration Officer.
- **The Victims of Crime Act (VCA)** which provides for the access of victims of trafficking and their families to assistance services and compensation for victims who actively participate in criminal proceedings. It refers to **the Criminal Injuries Compensation Scheme (S.L. 9.12)** which includes THB among the offences for which a victim may seek State compensation.
- **The Minor Protection (Alternative Care) Act** which covers various child protection measures, including those provided during judicial proceedings, and those addressing issues related to foster care.
- **S.L. 601.03 on Public Procurement Regulations** which provides for the exclusion of economic operators convicted of human trafficking from public procurement procedures.
- **The Passports Ordinance, Chapter 61 of the Laws of Malta** which prohibits the unauthorised use or attempted use of a passport issued to someone other than the person entitled to use it. It prevents fraudulent or illegal activities, including the potential exploitation by human traffickers who may take control of passports belonging to their victims.
- **The Police Act, Chapter 164, of the Laws of Malta** which offers protection under witness protection programmes and agreements with other countries, including in relation to evidence received by video conferencing.
- By virtue of **Act V of 2024 Criminal Code (Amendment No. 2) Act**, Article 55(1) of the Police Act has been amended in the sense that a '*vulnerable victim or witness*' shall have the interview/statement recorded by audio-visual means, which is admissible as evidence. This makes it clear that the provisions of sub-

³ See Third Monitoring Report of the GRETA on Malta p 14-15.

article 3A of Article 646 of the Criminal Code shall apply.⁴ Act V of 2024 further focuses on providing enhanced protection for victims of sexual offenses who are minors, including non-prosecution or exemption from punishment for acts they were compelled to commit in the context of sexual offenses and child prostitution. The Act also provides increased protection to vulnerable witnesses when making declarations to the police or giving evidence in a court of criminal judicature. Article 6 of Act V of 2024 amends Article 391(3) of the Criminal Code to state that “Where the witness is a minor under the age of eighteen (18) years the witness shall be examined and cross-examined in one sitting and his testimony shall be recorded by audio-visual means”. Article 7 of the Act amends Article 646(2) of the Criminal Code to state that where the witness is a minor under eighteen (18) years of age, and an audio and videorecording of the testimony of the minor is produced in evidence, the minor shall not be required to be examined *viva voce*.

- **The Protection of Whistleblower Act (Chapter 527 of the Laws of Malta)** which protects employees who disclose information, including on THB, in both public and private sectors.
- **Legal Notice 270/2023 - Employment and Industrial Relations Act CAP. 452 of the Laws of Malta, Employment Agencies Regulations, 2023** which came into force on 1 April 2024 to increase public awareness regarding the employment conditions in Malta prior to recruitment and to protect vulnerable foreign workers.

Furthermore, Malta has ratified the following international instruments for combatting trafficking in human beings:

- **the Council of Europe Convention on Action against Trafficking in Human Beings**
- **the United Nations Convention on Transnational Organized Crime and its Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocol)**

Malta is bound by the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR) and has ratified a number of other Council of Europe Conventions which are relevant to the fight against THB.⁵ Further, it is a party to relevant UN Conventions.⁶

4 Article 646 (3A) states that “An audio-visually recorded interview or statement of a minor, of any victim of a sexual offence, or of any vulnerable victim or witness made in accordance with sub-article (4) of article 346 shall be admissible as evidence: Provided that where the person so interviewed or who makes the statement gives evidence *viva voce* as a witness before a court during a trial, the said evidence shall be given by video conference from a place other than the courtroom where the trial is being held and shall be recorded by audio-visual means.” Criminal Code, accessed 26 April 2024, <<https://legislation.mt/eli/cap/9/20240223/eng>>.

5 Other relevant Council of Europe conventions ratified by Malta include: Convention on Laundering, Search, Seizure and confiscation of the Proceeds from Crime and on the Financing of Terrorism, ratified on 30/01/2008; Convention against Trafficking in Human Organs, ratified on 07/11/2018; Convention on Preventing and Combatting Violence against Women and Domestic Violence, ratified on 29/07/2014; Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, ratified on 06/09/2010; Convention on Cybercrime, ratified on 12/04/2012; Civil Law Convention on Corruption, ratified on 31/03/2004; Criminal Law Convention on Corruption, ratified on 15/05/2023; Convention for the Protection of Individuals with regards to Automatic processing of Personal Data, ratified on 28/02/2003; Second Additional Protocol to the European Convention on Mutual Assistance in Criminal Matters, ratified on 12 April 2012, European Convention on Extradition ratified on 19 March 1996 and its two Additional Protocols ETS No.086 and ETS No.098. Malta has also signed the following relevant partial agreements of the Council of Europe: European Commission for Democracy through Law (Venice Commission) and Group of States against Corruption (GRECO).

6 Other relevant conventions include: UN Convention on the Rights of the Child and its Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography, ratified on 30 September 1990; Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, ratified in 1991; Convention on the Elimination of All Forms of Discrimination against Women ratified 8 March 1991; Convention on the Rights of Persons with Disabilities and its optional protocol, ratified on 10 October 2012; ILO Convention on Forced or Compulsory Labour (No. 29) ratified on 4 January 1965; ILO Convention concerning the Abolition of Forced Labour, ratified on 4 January 1960 (No. 105); ILO Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, ratified on 15 June 2001).

Malta has transposed relevant EU Directives, including:

- **Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims, and replacing council Framework Decision 2002/629/JHA⁷**
- **Directive 2004/81/EC of 29 April 2004 on the residence permit issued to third-country nationals who are victims of trafficking in human beings or who have been the subject of an action to facilitate illegal immigration, who cooperate with the competent authorities.**
- **Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA.**

2.2 STAKEHOLDERS

The Office of the Prime Minister, European Funds, Equality, Reforms and Social Dialogue (OPM-EES) is entrusted with the reform of the anti-trafficking system and policy and the coordination of public bodies, non-governmental organisations (NGOs) and other stakeholders. It launched Malta's sixth National Action Plan (NAP) on Human Trafficking (2020-2023).

The Permanent Secretary (PS) of the OPM-EES is chairing the Human Trafficking Monitoring Committee (HTMC) which is composed of the Malta Police Commissioner, the Attorney General, the State Advocate, the Permanent Secretaries for the Ministry for Home Affairs, Security and Employment, the Ministry for Justice and Reform of the Construction Sector and the Ministry for Social Policy and Children's Rights, and the NGO Caritas Malta. It represents the highest-level decision-making body in the field of human trafficking which monitors domestic human trafficking trends and anti-trafficking measures, including by analysing the suitability of these measures within the domestic context. In addition, it is responsible for the adoption of the Anti-trafficking Strategy and the new National Action Plan and for monitoring its implementation.

The Human Rights Directorate (HRD) was established in 2015 to address national objectives in the areas of civil liberties, equality and non-discrimination, as well as the integration of migrants. It became part of OPM-EES in May 2024. The HRD was designated as National Rapporteur on THB in 2020 with the tasks of:

- a. Assessing trends in THB;
- b. Measuring the results of anti-trafficking actions and gathering statistics in close cooperation with relevant civil society organisations;
- c. Reporting.

The Human Rights Initiatives Unit (HRIU) was established in 2020 as part of the HRD and is leading the anti-trafficking reform by fulfilling the national coordination and reporting functions in the field of THB. The HRIU also chairs the Anti-Human Trafficking Inter-Ministerial Committee (IMC), which is composed of focal points of all Ministries. The IMC meets on a quarterly basis.

In addition, the institutional framework for combatting THB in Malta comprises the following bodies:

- **The Malta Police Force (MPF) and its Vulnerable Victims Unit within Public Protection Department**, which comprises a dedicated Anti-Trafficking Unit, established in October 2023.

⁷ The Directive of the European Parliament and of the Council amending Directive 2011/36/EU on Preventing and Combating Trafficking in Human Beings and Protecting its victims was adopted on 27 May 2024 by the Council of the European Union and will enter into force on the twentieth day following its publication on the EU Official Journal.

- **The Foundation for Social Welfare Services (FSWS) and its Aġenzija Appoġġ** which is the main provider of assistance to victims of trafficking. It has a sub-unit to address THB for the purpose of sexual exploitation and runs a safehouse for victims of trafficking. The Agency performs outreach activities for professionals, the general public, and vulnerable groups, and maintains a data collection system on potential and formal victims. **FSWS Child Protection** is the referral point of cases concerning children.
- **The Agency for the Welfare of Asylum Seekers (AWAS)** which is responsible for the management of reception facilities and the support to refugees, persons enjoying international protection, and asylum seekers.
- **The Victim Support Agency (VSA)** which seeks to strengthen victim protection measures by offering a 'one stop shop' for victims of crime including those who have been trafficked.
- **The Office of the Attorney General (AGO)** which stands as the primary public prosecutor, and can prosecute cases of THB offences since October 2021. The AGO has adopted its own operational Anti-Trafficking Strategy which was taken into account during the preparation of this Strategy.
- **Jobsplus**, which is the public employment service in Malta, has a role in identifying potential cases of THB through its work with job seekers and employers. This includes identifying job vacancies that may be linked to trafficking, as well as identifying job seekers who may be at risk of exploitation. It also offers training and has its own data collection system.
- **The Migrant Health Liaison Office (Primary Health Care services) and the GU Clinic (Mater Dei Hospital)** set up a network of health clinics across Malta to provide health care services to all, including vulnerable populations and victims of trafficking.
- **the Department of Industrial and Employment Relations (DIER)** which conducts inspections to ensure that employers are complying with labour laws, promotes labour rights and provides guidance to employers and workers on labour laws and regulations.
- **The Financial Intelligence Analysis Unit (FIAU)** which identifies, monitors, and analyses financial transactions that may be linked to trafficking in human beings activities when addressing suspected money laundering activities and funding of terrorism.
- **The International Protection Agency (IPA)** is responsible for receiving, examining and taking decisions on applications for international protection. The IPA also provides asylum seekers with information pertaining to the asylum procedure, and on their rights and obligations. Given the existing vulnerabilities of asylum seekers and their particular exposure to trafficking in human beings, the IPA should be further empowered to detect possible victims and ensure that information is made available on existing risks of THB and on means to report.
- **Identita** which is the agency entrusted with the verification of passports, visas, identity documents, as well as with issuing or renewing work and residence documents and the registration of public deeds and acts of civil status.
- **The Legal Aid Agency** which manages the provision of legal aid in accordance with S.L. 595. 11 on the Legal Aid Agency (Establishment) Order and is funded from the national budget. In criminal cases, no means testing is carried out for victims of crime. In civil cases, the Legal Aid Agency carries out merit and means tests to decide if a person is eligible (Article 912 of the Code of Organisation and Civil Procedure (COCP)). The legal aid roster does not include specialised lawyer on THB. The Legal Aid Agency has so far never received a direct request to provide services to victims of human trafficking.
- **National School Support Services (NSSS)** within MEYR, provides support to schools in various ways, including through school visits, training sessions for educators, and individual or group interventions. NSSS has two sections: Educational Psycho-social Services and Inclusive Education Support.
- **Civil society organisations** such as the Women's Rights Foundation, Dar Hosea, the Aditus Foundation, Jesuit Refugee Status (JRS) and Kopin, which have an important role to play among at-risk groups and sectors, and in providing assistance and support to victims of THB.

2.3 CHALLENGES RELATED TO THE LACK OF DATA AND RESEARCH

Malta is currently lacking the appropriate tools to gather data on THB based on common indicators for national reporting purposes. This is coupled with low victim identification rates, which implies that available evidence is limited. This means that there is not a reliable measure of the scale and characteristics of trafficking in Malta.

In parallel to the official mandate of the National Statistics Office (NSO), data collection processes are carried out by multiple entities from various sectors (e.g., social services, health, justice) and NGOs. These entities collect data and produce their own statistics according to their own indicators. This leads to a lack of consistency and reliability of the data and information.⁸ Currently there is no single place where all trafficking-related research and data can be compiled and used to monitor trends and gather insight into the realities of THB in Malta.

Therefore, caution needs to be taken in the following observations as the data is considered not sufficiently consistent and reliable.

2.4 TRENDS IN TRAFFICKING IN HUMAN BEINGS IN MALTA

The third GRETA report noted that Malta is a country of destination for trafficked persons. The 2023 US Trafficking in Persons (TIP) Report states that in 2022, the MPF and Aġenzija Appoġġ identified 14 foreign trafficking victims (12 for the purpose of sexual exploitation and 2 for forced labour), compared to 18 victims identified in 2021. According to the statistics communicated by the Maltese authorities for the purpose of the third GRETA report, the total number of formally identified victims of THB in 2017-2020 was 44: 5 in 2017 (all women), and 35 in 2018 (13 men, 22 women, 1 child).

To date, the adult victims who were formally identified were foreign nationals, mainly from Ukraine and the Philippines, Nepal, China, and more recently from South America, including Columbia. The police recently started to put more emphasis on the identification of possible victims of trafficking among Maltese nationals.

There is currently little data on the nexus between asylum and trafficking. At the same time, it is acknowledged that the approximate 9,000 refugees, 4,000 asylum-seekers, and 5,000 irregular migrants from African countries residing in Malta are vulnerable to trafficking in the country's informal labour market.⁹

The 2023 US TIP report also highlights certain limits to the identification of child victims in Malta in 2022. In 2018, the Maltese authorities formally identified for the first time a child victim of trafficking who had arrived in Malta in 2018 as an unaccompanied child and was subsequently sexually exploited. Furthermore, in 2020, 3 Maltese children were identified as victims of trafficking. Unaccompanied children are a real concern, and it is likely that the true scale of child trafficking is much higher.

In addition to these statistics on formally identified victims by the police, there are a number of potential victims of trafficking in human beings who have refused to report to the police and have been assisted by NGOs.

⁸ See the IMC Terms of Reference, 4.1.e, page 3.

⁹ TIP Report.

TYPES OF EXPLOITATION

During the period of 2017-2020, the predominant form of exploitation of the identified victims was labour exploitation (77% of the victims), followed by trafficking for the purpose of sexual exploitation.¹⁰ The third GRETA report highlights that several measures¹¹ were adopted to minimise risks of labour exploitation. However, civil society organisations reported an increasing number of cases of labour exploitation in various sectors, particularly in construction, hospitality cleaning, domestic work and fishing, facilitated by the lack of control by the authorities over employment agencies. In addition, there is a lack of regular control of at-risk areas, such as massage parlours.¹²

There are concerns about abusive recruitment practices by recruitment and temporary work agencies, which are not regulated and use deceptive recruitment practices and debt bondage as a means of control. On 23 November 2023, the new Employment Agencies Regulations were published and came into force on 1 April 2024. The Regulations are more stringent in its licencing process for employment agencies that act as recruitment agencies for employment in or outside of Malta, temporary work agencies and outsourcing agencies.

Victims of THB in Malta qualify for residence permits under S.L 217.07, granting 6 months leave to remain in Malta, and is renewable for successive periods of 6 months if the police, specifically the Principal Immigration Officer, confirms that the victim is still cooperating. If a victim of THB no longer satisfies the conditions of S.L 217.07, they are freely allowed to change to another permit under national legislation, such as the Single Permit (S.L 217.17),¹³ provided that they meet the eligibility criteria of such permits. However, it is unclear whether victims of THB are in practice able to be considered under S.L 217.17. This permit would grant them residence and work permits and would result in victims of trafficking having the right to remain in Malta for the length of their employment contract, which could offer longer term stability. Currently, procedures for approval under SL 217.07 can take several months, which create a lot of distress and uncertainty for victims of THB.

Additionally, the direct link between obtaining residence permits and employment contracts in Malta via the Single Work Permit under S.L 217.17 seems to contribute to increase the vulnerability of the migrant workers who are unlikely to report abusive working conditions because of fear of losing their residence permit which is tied to the work permit. Despite the fact that under S.L 217.17 all third country nationals are permitted to change employment without providing a reason or any other previous employment tenure, in practice, this does not seem to take place easily. In this context, the Council of Europe Recommendation CM/Rec(2022)21 on preventing and combatting trafficking in human beings for the purpose of labour exploitation asks member States to establish mechanisms that enable migrant workers to leave an employment relationship, to take up another job with another employer, and to use available complaint mechanisms without fear of losing their residence status.¹⁴

10 Third GRETA Report, paragraph 12.

11 Third GRETA Report, page 36, paragraph 152.

12 Project findings of the inception phase.

13 **SL 217.17** on Single Permit regulations transpose the provisions of Council Directive 2011/98/EC of 13 December 2011 regarding a single application procedure for a single permit for third-country nationals to reside and work in the territory of a Member State and on a common set of rights for those third-country workers legally residing in a Member State. It regulates the temporary-type permit which authorises third country nationals to legally reside and take up employment in Malta for a defined period of over 6 months which may be further renewed. The single application procedure incorporates an employment license and residence permit. *Subsidiary legislation 217.17*, accessed 26 April 2024, <<https://legislation.mt/eli/sl/217.17/eng/pdf>>.

14 See para. 16 of the Explanatory Memorandum.

INVESTIGATION AND PROSECUTION

In the period 2017-2020, 16 investigations were conducted into human trafficking cases (9 for labour exploitation and 7 for sexual exploitation). In 2022, the Malta Police Vice Squad¹⁵ initiated 12 new investigations: 7 for sexual exploitation and 5 for labour exploitation.¹⁶

In October 2021, the Office of the Attorney General took a more direct role in trafficking cases and became the main prosecutor for such cases. In 2022, prosecutors initiated criminal proceedings against 6 suspects for sexual exploitation; this was an increase compared to the 0 prosecutions in 2021, 2 in 2020, and 0 in 2019 prior to the AGO taking responsibility for THB prosecutions.¹⁷ Further, in March 2023, the AGO initiated criminal proceedings against two persons for THB for the purpose of labour exploitation. In May 2024 charges of labour and sexual trafficking combined with money laundering charges were filed against three perpetrators. For the first time, THB was prosecuted along with money laundering.

In the period 2017-2020, judgments were issued in five cases, resulting mostly in acquittals of the accused. In 2023, the Court of Appeal found two persons guilty of THB for the purpose of labour exploitation, who were sentenced to a term of effective imprisonment. The Criminal Court in a separate case also sentenced two persons to nine years and ten years effective imprisonment respectively in relation to THB for the purposes of sexual exploitation amongst other offences.

The use of information and communication technologies (ICTs) by traffickers to conduct their activities is advancing at a fast pace while law enforcement struggles to keep up. Despite a substantial increase in THB prosecutions and convictions, Malta still faces legal and operational obstacles in detecting, investigating, and prosecuting cases of THB. The constantly evolving volume of online activities, the use of encrypted communication and anonymous software, requires intensive technological and human resources. The objectives of the Strategy in this area were built on the GRETA's Study on Online and technology-facilitated trafficking in human beings.¹⁸

Convicting traffickers and issuing effective, proportionate and dissuasive sanctions is essential to combat THB and guarantee victims' access to justice. Proceedings in criminal cases are very lengthy in Malta. This negatively impacts victims of trafficking, who might be exposed to repeated confrontation and repeated victimisation and creates important distrust in the criminal justice system.¹⁹

PREVENTION

The National Action Plan for 2020-2023 has a strong focus on coordinated efforts to raise awareness on THB in Malta, involving multiple stakeholders and targeting different groups of the population, using various media platforms. This includes a national awareness raising campaign addressed to the general public on what constitutes THB and its indicators. GRETA stressed the importance of designing awareness raising actions in light of the assessment of previous activities and of focusing on the needs.

¹⁵ Now named Vulnerable Victims Unit.

¹⁶ TIP Report on Malta, 2023

¹⁷ TIP Report on Malta, 2023

¹⁸ The Study offers an assessment of the extent to which technology impacts THB as well as an exploration of the traffickers' modus operandi in the context of online and technology-facilitated THB. At the core of this study is an exploration of the operational and legal challenges that State Parties – and to some extent NGOs – face in detecting, investigating and prosecuting online and ICT-facilitated THB, as well as identifying victims and raising awareness among at-risk groups. Crucially, the study also explores the strategies, tools and 'good practices' adopted by State Parties and NGOs to overcome such challenges and enhance their response to online and technology-facilitated THB

¹⁹ Third GRETA Report, paragraph 104

There is currently no work undertaken in Malta to address the risks of trafficking in supply chains, however, this could be an important way to prevent human trafficking. More needs to be done in relation to wider awareness raising, and efforts to address root causes such as poverty.

The US TIP report specifically identifies that the government initiative to increase economic growth has meant a significant growth in the presence of foreign national workers, most of whom were employed in low-earning vocations. However, the government did not correspondingly report efforts to proactively inform foreign workers of their rights and responsibilities and to create resources for victim assistance. The report notes that while charging recruitment fees is illegal, this was still taking place across Malta.²⁰

PROTECTION

Improving the identification of victims of THB, including children, is considered as a high priority. This is particularly important with the increase of online recruitments and exploitation. Malta's current National Referral Mechanism is not fully functioning and therefore requires improvement regarding its end-to-end referral pathway and its formal set up and use. Additionally, Malta lacks a specialised NRM for children. The main provider of support to victims of THB is Aġenzija Appogg, which runs one safehouse with very limited resources and staff. There is currently a two-month recovery and reflection period in law.²¹

PROSECUTION

Several reforms and efforts have taken place over the years to address the low number of prosecutions of human trafficking cases, such as the police transformation project and the establishment of a specialised anti-trafficking unit, training of the judiciary, and a reform of the AGO including the specialisation of prosecutors and the adoption of the AGO anti-trafficking strategy. One significant challenge is that the non-punishment principle is not consistently applied, and victims who were compelled to commit criminal offences as a result of being trafficked are punished.²² The Maltese Electoral Manifesto Measures 663 and 664 refer to the importance of finding solutions to protect the most vulnerable rather than resorting to imprisonment, particularly in the context of forced prostitution. The implementation of these Measures can be supported through the identification, analysis, and communications regarding patterns of trafficking, in order to ensure that potential victims who are also involved in criminal activities are firstly considered as victims of trafficking and not immediately arrested, prosecuted or deported.

Malta has an overall adequate legal framework for combatting human trafficking, except for two areas which require action: to introduce as an aggravating circumstance the offence of THB committed against a child regardless of the means used, and to ensure victims' access to compensation. However, despite the legal framework and two recent convictions in THB cases, challenges of delays in the court proceedings and high acquittal rates means that very few victims currently see their traffickers prosecuted.

²⁰ TIP report

²¹ TIP Report

²² Third GRETA Report. In particular see Chapter 8, page 28

3. PROCESS OF DEVELOPING THE STRATEGY

3.1 BASIS

The 2024-2030 Strategy is based on:

- the provisions the Council of Europe Convention on Action against Trafficking in Human Beings, the findings and conclusions of the Council of Europe Group of Experts on Action against Trafficking in Human Beings (GRETA) in its third evaluation report on Malta (herein after “third GRETA report”), and the recommendations issued by the Committee of the Parties to the Convention to Maltese authorities on the basis of the GRETA report;
- the Strategy on Combatting Trafficking in Human Beings of the European Union (2021-2025) and the Fourth Report of the European Commission to the European Parliament on the progress made in the fight against trafficking in human beings (the Fourth Report) which was published on 19 December 2022 concerning on-going developments regarding the recent proposal of the European Parliament and of the Council amending Directive 2011/36/EU on preventing and combatting trafficking in human beings and protecting its victims;
- the Strategy and Action Plan established by the Inter-Agency Co-ordination Group against Trafficking in Persons (ICAT) in 2020;
- the relevant Sustainable Development Goals (SDGs), in particular: eliminating all forms of violence against women and girls, including sexual exploitation (SDG 5.2), eradication of trafficking and forced labour (SDG 8.7) and eradication of trafficking of children (SDG 16.2);
- Relevant recommendations of the Committee of Ministers of the Council of Europe, in particular Recommendation CM/Rec(2022)21 of the Committee of Ministers to member States on preventing and combating trafficking in human beings for the purpose of labour exploitation and Recommendation CM/Rec(2023)2 of the Committee of Ministers to member States on rights, services and support for victims of crime;
- the annual US Department of State Trafficking in Persons (TIP) reports on Malta;
- consultations with relevant actors in bilateral and roundtable meetings at different stages of the project and the findings of the analysis of the current anti-trafficking patterns in Malta and national responses to address them, a SWOT analysis, an analysis of needs and gaps and research on victims of trafficking in Malta regarding their experiences during the identification process and of services received.

3.2 STRATEGY DESIGN AND PROCESS

The Strategy was developed in the context of the Joint EU DG Reform-Council of Europe Project (hereinafter the Project) **“Supporting Malta in the design and implementation of a new national Anti-Trafficking Strategy”** (September 2022 - January 2025), which was implemented by the Anti-Trafficking Division of the Council of Europe, with the involvement of a series of consultants engaged for the purpose of the project, and in close collaboration with the HRIU within the HRD of the OPM-EES. The action was co-funded by the EU via the Technical Support Instrument (TSI).

The Strategy was prepared in four different Working Groups (WGs) on: Anti-Trafficking Supporting Framework (WG1); Prevention and Protection (WG2); Prosecutions and Investigations (WG3); and International Partnerships (WG4). They were chaired by the HRD and moderated by the Council of Europe consultants. The WGs followed a multi-disciplinary approach and were composed of at least one representative of relevant governmental entities, civil society organisations, private companies, trade unions and researchers who contributed to the preparation of the Strategy and its first National Action Plan with their expertise and knowledge.

Issues related to the prevention of child trafficking, the protection of children who are victims of trafficking, the investigation and prosecution of THB cases involving children, as well as international partnerships to tackle child trafficking were addressed in the different WGs with child protection specialists.

The recommendations made by victims and survivors of human trafficking on the basis of their experience of the identification process and the services provided to them were integrated in the preparation of the Strategy.


3.3 STRATEGIC PRIORITY AREAS

The following five priority areas were identified as key to improving strategic actions to combat human trafficking in Malta:

- Strategic Area 1: Strengthening the supporting anti-trafficking framework
- Strategic Area 2: Ensuring targeted prevention and early identification of potential victims and persons at risk
- Strategic Area 3: Increasing reporting by victims, effective investigation and prosecution of traffickers
- Strategic Area 4: Comprehensive victim protection, justice and remedies
- Strategic Area 5: Strategic partnerships at regional and international levels to tackle human trafficking

3.4 ADOPTION OF THE STRATEGY

The Anti-Human Trafficking Inter-Ministerial Committee (IMC) approved the content of the Strategy in relation to the relevant Ministries which will have a direct role in implementing its strategic objectives and actions out of the National Action Plan. During a Joint IMC and HTMC Meeting held at Aula Magna, University of Malta, Valletta, on 8 July 2024, the Human Trafficking Monitoring Committee (HTMC) adopted the final draft of the Strategy before communicating it to the Cabinet.



THE WGS FOLLOWED A MULTI-DISCIPLINARY APPROACH AND WERE COMPOSED OF AT LEAST ONE REPRESENTATIVE OF RELEVANT GOVERNMENTAL ENTITIES, CIVIL SOCIETY ORGANISATIONS, PRIVATE COMPANIES, TRADE UNIONS AND RESEARCHERS WHO CONTRIBUTED TO THE PREPARATION OF THE STRATEGY

4. MISSION AND LEADING PRINCIPLES

4.1 MISSION STATEMENT

The mission of the Strategy is to ***mobilise institutional and societal efforts to dismantle the trafficking chain*** by addressing risks of recruitment with effective, targeted prevention, equipping relevant agencies with the right tools and intelligence to reduce identified threats, ensuring that perpetrators are brought to justice, and providing the necessary support and protection to all victims.

4.2 LEADING PRINCIPLES

- **Government ownership:** The Strategy was drafted under the leadership of the Human Rights Directorate within the OPM-EES with the active participation of the IMC and of all other relevant institutions. Representatives from each Ministry have validated the analysis that serves as a backbone of the Strategy and have assumed responsibility in defining the overarching goals and specific objectives of the Strategy. The ministries and other government agencies will be responsible for implementing the activities of the National Action Plan.
- **Civil society participation:** Civil society has played a vital role in the development of the Strategy. The views of civil society have been incorporated through their participation in validation workshops and a specific roundtable for civil society actors. Civil society will continue to play an active role in the decision-making process regarding anti-trafficking actions, as well as for the implementation of the measures envisaged in the National Action Plan. Civil society will also play a role in the monitoring and evaluation of the Strategy.
- **Human rights-based approach:** The Strategy ensures that the human rights of victims are at the heart of all anti-trafficking responses. The Strategy is based on international human rights standards, most notably the Council of Europe Convention on Action against Trafficking in Human Beings and the case-law of the European Court of Human Rights. All operational measures adopt a victim-centred approach to ensure that the rights of victims are protected at all stages and that they are not subject to re-victimisation.
- **The principle of the best interests of the child:**²³ This principle is observed in all priorities and objectives related to children at risk and child victims of trafficking measures. It should guide all decisions related to children made by national authorities and civil society actors in the implementation of the Strategy.
- **Gender-specific approach:** The specificities of trafficking in human beings are reflected in differences of recruitment, control and exploitation of women and men. THB can also have specific and different impacts on women and men. For this reason, prevention strategies, as well as assistance and support measures for victims should be gender-specific, considering the different needs of male and female victims.

²³ See Article 3(1) of the UN Convention on the Rights of the Child.



THE STRATEGY ENSURES THAT THE HUMAN RIGHTS OF VICTIMS
ARE AT THE HEART OF ALL ANTI-TRAFFICKING RESPONSES.

THE STRATEGY IS BASED ON INTERNATIONAL HUMAN RIGHTS
STANDARDS, MOST NOTABLY THE COUNCIL OF EUROPE CONVENTION
ON ACTION AGAINST TRAFFICKING IN HUMAN BEINGS
AND THE CASE-LAW OF THE EUROPEAN COURT OF HUMAN RIGHTS

- **Interdisciplinary and cross-sectoral approach:** Trafficking in human beings is a complex issue and addressing it calls for a coordinated, interdisciplinary, and multi-sectoral approach relying on expertise and knowledge from diverse disciplines and actors. In addition, anti-trafficking actions need to address root causes, risks, threats, and new methods used by traffickers, as well as to ensure effective criminal justice response and comprehensive care and protection for victims.
- **Non-discrimination:** Different forms of discrimination (e.g., discrimination against minorities and vulnerable social groups, migration policies of discriminatory and restrictive nature, gender-based discrimination) are very often root causes of trafficking in human beings. The Strategy ensures that the recommended measures apply to all victims in a non-discriminatory manner, in accordance with Article 3 of the Convention – women, men and children, including persons with disabilities, whether subjected to transnational or national trafficking, regardless of the form of exploitation and the country where they were exploited.
- **Sustainability:** The Strategy envisages the strengthening or the establishment of coordination structures that will ensure the sustainability of the inter-disciplinary approach. The coordination structures will also ensure that all anti-trafficking actions remain relevant to changing political contexts and will be sustainable over time.

5. ADDED VALUE OF THE STRATEGY

The conception of this Strategy is rooted in the acknowledgment that human trafficking is a complex and cross-cutting issue, demanding a holistic approach to effectively address its multifaceted challenges. The Strategy fosters a confluence of ideas, expertise and resources, aimed at developing a common reference framework that is not only articulated with specific, time-bound processes but also mobilises all relevant stakeholders that play a pivotal role in the fight against THB.

The Anti-Trafficking Strategy goes beyond mere procedural intervention, serving as a tool that highlights existing needs, catalyses transformative responses, and triggers substantive change across all relevant dimensions of society and governance. It aims to dissolve the tendency to work in silos, fostering an environment that supports collaborative efforts and collective ownership through an inclusive process that empowers every stakeholder.

Transparency and adaptability stand at the forefront of Malta's Anti-Trafficking Strategy, presenting a clear, actionable framework for the coming years which also provides a robust structure to evaluate the impact and effectiveness of all initiated actions. This dynamic adaptability ensures that the Strategy remains continuously relevant, reflecting the evolving landscape of trafficking and the consequent counteractive measures required.

The Anti-Trafficking Strategy creates a common understanding of combatting human trafficking in Malta and the roles of government bodies and civil society. It is a testament to Malta's commitment to continue to strengthen its anti-trafficking system and to maintain the fight against trafficking in human beings high on the political agenda in Malta.

6. IMPLEMENTATION, MONITORING AND EVALUATION

6.1 IMPLEMENTATION

The Strategic Framework in Section 7 and the National Action Plan in Section 8 establish which institutions are responsible for each specific objective and related actions according to existing roles in the relevant fields. Different institutions may be concerned as there are various tasks that are complementary or sometimes overlap and therefore cooperation among them is instrumental. Cooperation between government agencies and NGOs is particularly encouraged because of their experience and knowledge. In cases where the actions fall under the mandate of several authorities, the authority having the prevailing role will assume a leading role (herein after “lead”) while others will be referred to as “supporting” partners.

Implementing all the actions of the National Action Plan requires both human and financial resources that can vary considerably depending on the action in question which may be carried out in the context of existing functions. This was sought throughout the development of the Plan to ensure cost-effective results. Nevertheless, additional funds and human resources will be necessary to implement the Strategy and the National Action Plans.

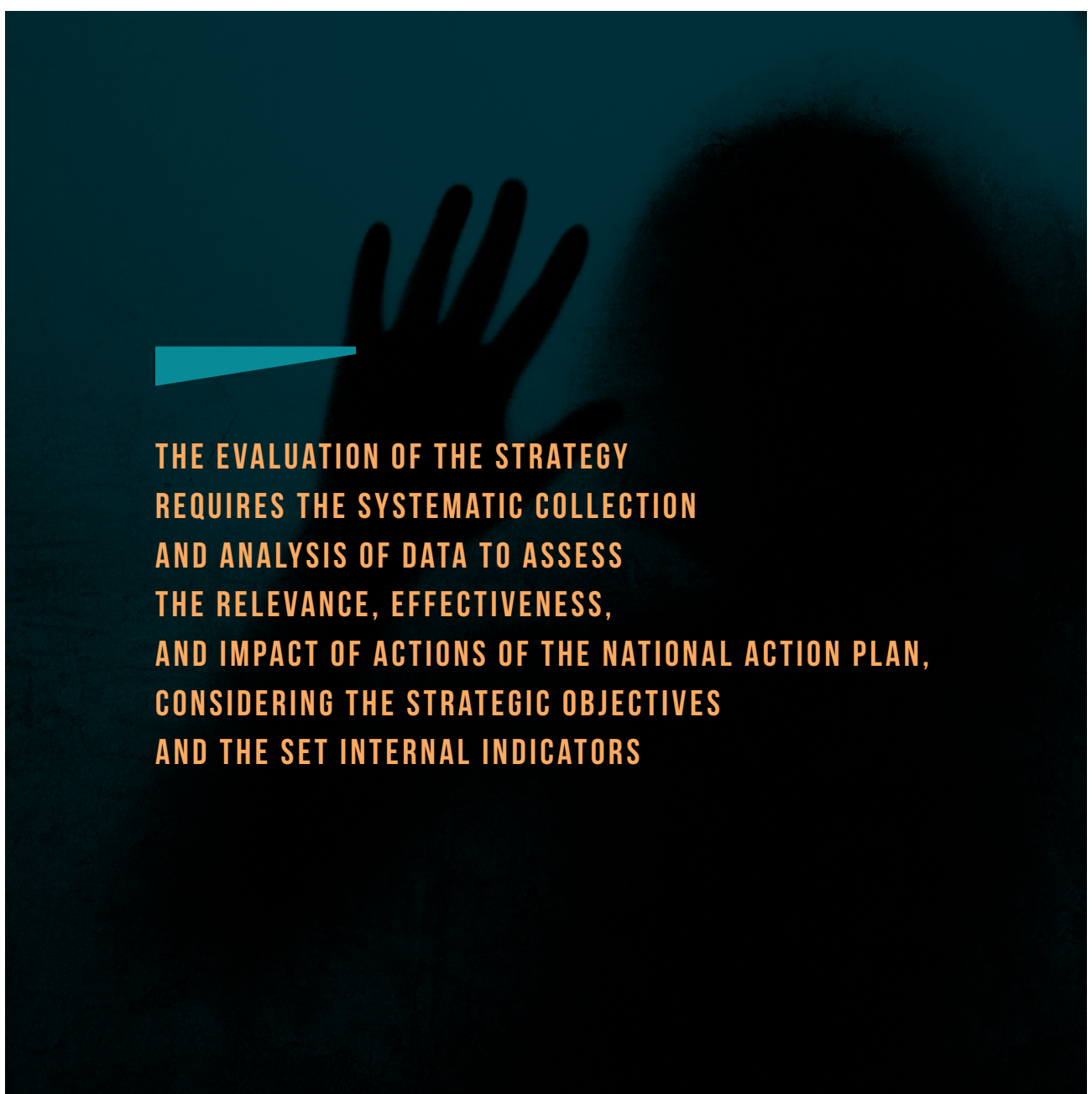
The implementation of Strategic Area 1 on strengthening the supporting anti-trafficking framework is considered as of highest priority and will be firstly addressed with the support of the Council of Europe to ensure the effective implementation of all other strategic objectives and related actions.

6.2 MONITORING

The Strategy will be implemented for a period of seven years with actions of its first National Action Plan over a time frame of four years which will be subject to a continuous examination of progress achieved to track compliance with the Plan. The monitoring of the Strategy will check on how planned activities are progressing, identify operational difficulties and recommend actions. This will ensure that adjustments are made according to national developments and that the allocated resources and delivered results are making the intended difference on target groups. The HRD will monitor and present progress results in reports which will be prepared in cooperation with other responsible institutions on the basis of a pre-defined template via Working Groups. The responsible institutions will be required to annually produce information in accordance with the template. Progress in the implementation will also be discussed in meetings summoned by the HRD. The Council of Europe will continue to offer its support, in the first months of Year 1, to develop a Monitoring and Evaluation framework with tools, processes and guidelines prepared in cooperation with relevant actors for which training and coaching sessions will also be provided.

6.3 EVALUATION

Two evaluations will take place: a mid-term evaluation of the Strategy at the end of its first National Action Plan and a final evaluation. The evaluation of the Strategy requires the systematic collection and analysis of data to assess the relevance, effectiveness, and impact of actions of the National Action Plan, considering the strategic objectives and the set internal indicators. This will be done using various sources of information, including annual reports as a baseline. Evaluations will enable stakeholders to identify where adjustments are needed on the approach taken to address the specific strategic areas and to decide on future objectives and actions. The evaluation should be outsourced to obtain an independent and objective assessment of the results of the Strategy. Once established, the National Rapporteur should play a pivotal role in the evaluation of the Strategy.



**THE EVALUATION OF THE STRATEGY
REQUIRES THE SYSTEMATIC COLLECTION
AND ANALYSIS OF DATA TO ASSESS
THE RELEVANCE, EFFECTIVENESS,
AND IMPACT OF ACTIONS OF THE NATIONAL ACTION PLAN,
CONSIDERING THE STRATEGIC OBJECTIVES
AND THE SET INTERNAL INDICATORS**

7. NATIONAL STRATEGIC FRAMEWORK 2024-2030

STRATEGIC AREA 1: STRENGTHENING THE SUPPORTING ANTI-TRAFFICKING FRAMEWORK

Strategic Goal	Specific objectives	Competent Institutions	Expected results
1.1 Strengthen national anti-trafficking bodies	1. Identify which entity should fulfil the role of National Coordinator (currently the IMC) and National Rapporteur (currently the HTMC).	Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC)	OPM-EES and MHSE, with the support of the National Coordinator (IMC) and National Rapporteur adopts and implements comprehensive anti-trafficking policies.
	2. Define the roles of the National Coordinator (IMC) and the National Rapporteur to increase clarity, sustainability and authority of the institutions.	Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC)	OPM-EES and MHSE, with the support of the National Coordinator (IMC) and the National Rapporteur, adopts and implements comprehensive anti-trafficking policies.
	3. Address Strategic goal 4.1/Specific Objective 1 and identify and legally define which entity/ies should be responsible for the National Referral Mechanism and who should manage it.	Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC)	The NRM is established and operational.
1.2. Strengthen institutional capacities	1. Ensure inter-agency cooperation through thematic Working Groups to support the National Coordinator (IMC) in devising and implementing national action plans.	Lead: OPM-EES/HRD, National Coordinator (IMC)	Authorities gain clearer insights in specific areas of the national action plan in particular in the field of prevention and protection including with regards to child trafficking, international partnerships and formulating targeted measures to form part of the NAP accordingly.

1.3 Improve the legal and regulatory framework	1. Plan reforms , with a view to addressing the urgent recommendations made by GRETA.	Lead: OPM-EES/ National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC) Supporting: OPM-EES/HRD, MJR	National authorities continue to improve the legislative framework according to international standards.
	2. Evaluate the possibility to introduce as an aggravating circumstance the offence of THB committed against a child regardless of the means used.	Lead: OPM-EES/ National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC) Supporting: OPM-EES/HRD, MJR	National authorities should consider proposals to continue to improve the legislative framework according to international standards, child trafficking cases are prosecuted and dissuasive penalties are imposed.
	3. Review laws and regulations, and make proposals as necessary, to facilitate financial investigations, asset seizures, and forfeitures in human trafficking cases.	Lead: OPM-EES/ National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC) Supporting: OPM-EES/HRD, MJR	National authorities should consider proposals to continue to improve the legislative framework according to international standards. Increased number of financial investigations are conducted and data is kept of the amount of assets seized.
	4. Evaluate the possibility of strengthening legislation to use confiscated assets for victim compensation.	Lead: OPM-EES/ National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC) Supporting: OPM-EES/HRD, MJR	National authorities should consider proposals to continue to improve the legislative framework according to international standards.
	5. Amend/repeal the White Slave Traffic Ordinance Act and remove it from the statute.	Lead: OPM-EES/ National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC) Supporting: OPM-EES/HRD, MJR	Assess whether any legislation should be repealed.
	6. Ensure that the legal framework is in place to allow the police to investigate and inspect licenced as well as unlicenced premises where there are reasonable grounds to believe that human trafficking and exploitation are taking place.	Lead: OPM-EES/HRD, National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC) Supporting: MEEP/ Trade Licencing Unit, MHSE/MPF	Improved capabilities and response of police officers to combat THB.

STRATEGIC AREA 2:

ENSURING TARGETED PREVENTION AND EARLY IDENTIFICATION OF POTENTIAL VICTIMS AND PERSONS AT RISK

Strategic Goal	Specific objectives	Competent institutions	Expected Results
2.1 Increase capacities in addressing root causes and reducing vulnerabilities and conducting targeted awareness/outreach activities	1. Increase and utilise knowledge of THB by drafting biannual situation reports on the latest developments and threats.	Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC) Supporting: CGBVDV, MEYR/UM, MIV/NGOs, IOs	Situation reports based on statistics, NRM data, operational intelligence, surveys, other relevant reports, open-source information are available and updated regularly.
	2. Improve understanding of THB through research on at-risk groups and root causes .	Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC) Supporting: CGBVDV, MEYR/UM, MCAST, MIV/NGOs, IOs	Improved prevention policies and measures targeting key risk factors and at-risk groups.
	3. Ensure synergies with sectors working on combatting and eliminating the root causes of THB such as poverty, discrimination, and early school leave, by increasing awareness on the related risks of human trafficking and formulating cross-sectoral policy priorities.	Lead: OPM-EES/HRD, National Coordinator (IMC) Supporting: MIV/NGOs, IOs, MSPC/FSWS	National authorities collaborate better and work regularly with NGOs to target root causes and work on reducing them effectively. Respective policies on diminishing poverty, discrimination, and early school leave positively impact and decrease the root causes of THB.
	4. Promote and facilitate pathways for legal migration .	Lead: OPM-EES/HRD, MHSE/Identita Supporting: MHSE/IPA, AWAS, Jobsplus, OPM-EES/DIER/MCESD, and EU National Liaison Officers, Chamber of Commerce, Chamber of SMEs, private sector, Trade Unions, MIV/NGOs, IOs	Labour migrants have legal migration opportunities and enhanced knowledge about legal pathways and their rights in Malta.

5. Address existing risks of THB of labour migrants .	<p>Lead: OPM-EES/HRD, MHSE/Identita, Jobsplus</p> <p>Supporting: OPM-EES/DIER, MCESD, Chamber of Commerce, Chamber of SMEs, Trade Unions, private sector, MIV/NGOs, IOs</p>	Labour migrants are better protected from risks of trafficking for the purpose of labour exploitation through improved information on their rights, strengthened reporting mechanisms, and more flexibility in leaving employment in case of abuse and supporting measures to find new employment.
6. Continue to raise public awareness on THB , its manifestation and risks, and where to report cases and seek assistance.	<p>Lead: OPM-EES/HRD, National Coordinator (IMC), MEYR/UM, MCAST</p> <p>Supporting: MIV/NGOs, National & Private Media Service Providers, MSPC/FSWS</p>	Increased societal recognition of THB and its signs.
7. Evaluate and improve the impact of awareness-raising campaigns .	<p>Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC), MEYR/UM, MCAST</p> <p>Supporting: MEYR, Commissioner for Children, schools, OPM/Office of the Communication Coordinators</p>	The general public is more aware of trafficking and how it manifests in Malta and is aware of the ways to report their concerns.
8. Discourage demand that fosters human trafficking through awareness sessions carried out in schools.	<p>Lead: OPM-EES/HRD, CGBVDV, MEYR/MCAST, MSPC/FSWS, CPS</p>	School children are educated about trafficking, exploitation, gender equality and the importance of human rights.
9. Collaborate with tech companies to combat online recruitment and exploitation of victims of THB.	<p>Lead: OPM-EES/National Coordinator (IMC), MEEP/MCA, Private Sector (IT companies)</p> <p>Supporting: OPM-EES/DIER/MCESD, Chamber of Commerce, Chamber of SMEs, MHSE/Jobsplus, MHSE/MPF</p>	National authorities establish stronger public-private partnerships to address online THB.

10. Enhance awareness raising efforts for high-risk groups.	<p>Lead: OPM-EES/HRD</p> <p>Supporting: MHSE/ AWAS, MPF, VSA, Jobsplus OPM-EES, DIER, CGBVDV, Trade Unions, MSPC/ FSWS, CPS, MIV/ NGOs, IOs</p>	At-risk groups are better informed and empowered to recognise, evade, and report THB.
11. Equip frontline professionals for early identification of potential victims.	<p>Lead: MHSE/Identita, AWAS, VSA, IPA, MPF</p> <p>Supporting: MSPC/ FSWS, MHSE/ Jobsplus, OPM-EES/ DIER, MHA, MIV/ NGOs, immigration officials at MIA/ports</p>	Frontline professionals are trained and better resourced to identify potential victims of THB at an early stage.
12. Ensure that labour standards and the institutional framework are in place to allow Jobsplus and DIER to carry out inspections in a complementary manner to identify victims of labour trafficking.	<p>Lead: OPM-EES/ National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC), MHSE/ Jobsplus, OPM-EES/ DIER</p> <p>Supporting: MJR</p>	Jobsplus, DIER and other agencies involved in upholding labour standards have sufficient mandate and capacity to identify victims of labour trafficking.
13. Increase outreach work in high-risk sectors	<p>Lead: OPM-EES/ HRD, National Coordinator (IMC), National Rapporteur (HTMC)</p> <p>Supporting: MHSE/ AWAS, MPF, Jobsplus, OPM-EES/DIER, MSPC/ Appoġġ, MHA, MIV/ NGOs</p>	The community police collaborate more efficiently and regularly with labour inspectors, NGOs and other relevant actors and identify more victims of THB in high-risk sectors such as construction, cleaning, domestic work, fishing, massage parlours, and adult entertainment and criminal exploitation with increased intelligence and data.
14. Tackle sexual exploitation in high-risk operations including massage parlours, adult entertainment and other areas, through licencing and oversight.	<p>Lead: OPM-EES/ HRD, National Rapporteur (HTMC), MEEP/Trade Licencing Unit MHSE/Jobsplus</p> <p>Supporting: OPM-EES/DIER, MHSE/ MPF</p>	National authorities licence massage parlours and other high-risk operations which can be more effectively monitored to detect more trafficking cases.

	15. Protect migrant workers, especially third-country nationals, from labour trafficking by enforcing stringent regulations and oversight of recruitment agencies.	Lead: MHSE/ Jobsplus Supporting: MHSE/ MPF, OPM-EES/DIER	National authorities regulate more efficiently and effectively recruitment companies, safeguarding the rights of labour migrants.
	16. Businesses undertake due diligence throughout their operations and supply chains to reduce risks of THB, particularly in sectors known for exploitative practices.	Lead: OPM-EES/ HRD, National Coordinator (IMC), National Rapporteur (HTMC) Supporting: MHSE/ Jobsplus, OPM-EES/ DIER, MFIN/FIAU and regulatory authorities (Malta Financial Services Authority, Malta Business Registry), Chamber of Commerce, Chamber of SMEs, OPM-EES/ MCESD, Business associations, trade unions, individual businesses (who may work with auditing firms, legal firms and risk assessment companies)	Businesses introduce anti-trafficking measures in their supply chains, such as control mechanisms, fair trade and other responsible measures and sanctions, and use due diligence and risk assessment measures to lower the risks of being involved, directly or indirectly, in trafficking for labour exploitation and report publicly about these measures.

2.2 Implement specific measures to address child trafficking	<p>1. Improve public awareness on the different manifestations of child trafficking</p> <p>by elaborating dedicated campaigns in cooperation with specialised child rights' institutions and NGOs.</p>	<p>Lead: MSPC/FSWS, CPS, Commissioner for Children, MEYR/MCAST</p> <p>Supporting: MHSE/AWAS, MPF, MIV/NGOs working on child rights' issues, children and youth groups including from different communities</p>	Increased public awareness of child trafficking and its indicators and early identification of children at risk.
	<p>2. Improve the awareness of THB among children and young people,</p> <p>in particular of the risks related to social media and the Internet through education and targeted child-friendly campaigns.</p>	<p>Lead: MSPC/FSWS, CPS, Commissioner for Children, MEYR</p> <p>Supporting: MHSE/AWAS, MPF, MIV/NGOs working on child rights' issues, children and youth groups including from different communities</p>	Children are empowered to recognise, avoid and report trafficking risks.
	<p>3. Improve reporting mechanisms for children at risk.</p>	<p>Lead: MSPC/FSWS, CPS, Commissioner for Children</p> <p>Supporting: MIV/NGOs</p>	Children at risk can easily access a helpline managed by trained professionals to seek assistance, leading to better protection and early identification of potential victims.
	<p>4. Increase collaboration with the education system to include human trafficking topics.</p>	<p>Lead: OPM-EES/HRD, MSPC/FSWS, CPS, MEYR</p>	Children in schools are better informed about trafficking risks.
	<p>5. Improve early identification of children at risk of trafficking by training education psycho-social services professionals, teachers and other education staff, social workers, healthcare professionals and legal guardians, on indicators of child trafficking.</p>	<p>Lead: MSPC/FSWS, MEYR/National School Support within MEYR, MCAST, MHA</p> <p>Supporting: OPM-EES/HRD, MEYR/UM</p>	Professionals can better identify children at risk and take appropriate actions to prevent exploitation.

STRATEGIC AREA 3:

INCREASING REPORTING BY VICTIMS, EFFECTIVE INVESTIGATION AND PROSECUTION OF TRAFFICKERS

Strategic Goals	Specific objectives	Competent institutions	Expected results
3.1 Modernise the MPF	1. Strengthen the specialisation, organisation, and functioning of the MPF to effectively counter THB.	Lead: MHSE/MPF, VSA, MSPC/FSWS Supporting: MEYR/UM	Enhanced capability leading to: <ul style="list-style-type: none"> - Improved victim identification. - Improved treatment of victims. - Increased number and quality of human trafficking investigations. - Increased confidence of partners and the public.
	2. Implement advanced intelligence systems and methodologies for enhanced data collection including by introducing a modern, full-featured police records management system.	Lead: MHSE/MPF Supporting: MEYR/UM	The MPF addresses cases of THB more effectively, assessing the investigators' workload, adopts investigation strategies and monitors trends of THB with accurate data collection on crime, and intelligence.
	3. Strengthen intelligence-led investigations with a National Intelligence Model (NIM) and effective use of advanced techniques.	Lead: MHSE/MPF Supporting: MEYR/UM	All operational officers and staff of the MPF collect, develop and disseminate systematically intelligence to make intelligence-led decisions about priorities and tactical options (regarding THB and all other crime).
	4. Develop and implement a Force-wide Tasking & Coordination Group (TCG) in line with the NIM.	Lead: MHSE/MPF Supporting: MEYR/UM	Tasking is intelligence led and prioritised in line with strategic priorities.
	5. Improve intelligence-led investigations with electronic intelligence and evidence and enhance identification of victims recruited and exploited online .	Lead: MHSE/MPF Supporting: private sector, MEYR/UM	The MPF increases the collection of IT intelligence and evidence to support THB investigations. Increased rates of identification of victims of trafficking through proactive use of the internet.
	6. Improve proactive investigation capability through intelligence-led operations supported by effective use of covert techniques, financial investigations, forensic strategies and analysis.	Lead: MHSE/MPF	The MPF improves the quality of evidence obtained against THB suspects to increase evidence led prosecutions with less reliance on victim testimony.

3.2 Modernise the Criminal Justice System within the systems of the AGO, MPF and CSA	1. Improve the efficiency and the quality of the criminal justice system in managing cases of THB with Case Management Systems for MPF, AGO and CSA which should be integrated.	Lead: MJR/ CSA Supporting: MHSE/ MPF, MJR/AGO, MEYR/UM	Integrated system ensures the integrity of data in managing THB cases during the criminal trial.
	2. Provide more training opportunities to the judiciary on the subject of THB.	Lead: MJR Supporting: Judicial Studies Committee	Trained judges have better capacity, skills and understanding of THB forms and crimes.
3.3 Improve Strategic Management and Partnership	1. Enhance coordination and cooperation within the criminal justice system to address gaps and needs in THB cases.	Lead: MJR Supporting: MJR/ AGO, CSA, MHSE/ MPF, MEYR/UM	Regular strategic initiatives improve the responses of the criminal justice system to THB cases.
	2. Boost coordination and cooperation between frontline professional, notably from civil society and law enforcement , to enhance engagement, cooperation and trust needed to combat THB effectively.	Lead: MHSE/MPF, MSPC/FSWS, MHSE/ Jobsplus, AWAS, OPM-EES/DIER, MIV/ NGOs Supporting: National Coordinator (IMC)	Improved stakeholder engagement, cooperation, and trust form a genuine partnership and provide diverse perspectives on all aspects of THB.
3.4 Enhance Financial Investigations to Disrupt Trafficking Networks	1. Improve capacities in the area of financial investigations and asset recovery in THB cases.	Lead: MHSE/MPF Supporting: MFIN/ FIAU, MJR/ARB, MEYR/UM	Strengthened capacity of competent institutions to conduct effective financial investigations to improve THB investigations and asset recovery leading to better positive outcomes and compensation awarded to victims. Increased seizures of financial assets of traffickers.
	2. Work with financial institutions to identify suspected money laundering of proceeds of THB .	Lead: MFIN/FIAU Supporting: MJR/ ARB, MHSE/ MPF, Financial institutions, supervisory bodies and international partners	Improved detection of suspicious financial activities, improved tracing of criminal assets and confiscation of criminal property.

STRATEGIC AREA 4:

COMPREHENSIVE VICTIM PROTECTION, JUSTICE AND REMEDIES

Strategic Goal	Specific objectives	Competent institutions	Expected Results
4.1 Improve victim identification and protection	1. Develop and put into place a formalised National Referral Mechanism for victim identification, referral, assistance and protection, which follows a multi-disciplinary approach to victim identification.	Lead: OPM-EES/HRD, National Coordinator (IMC) Supporting: MHSE/MPF, VSA, AWAS, IPA, Jobsplus, OPM-EES/DIER, MSPC/FSWS, MHA/Environmental Health Officer, Trade Unions, MIV/NGOs	All frontline professionals are required to effectively use the NRM, more victims are identified and provided assistance, and specific, reliable and up-to-date data on the situation of THB in Malta is centralised and used.
	2. Identify and train 'first responders' qualified and authorised to submit referrals of potential victims.	Lead: OPM-EES/HRD, National Coordinator (IMC) Supporting: MHSE/MPF, VSA, AWAS, IPA, Jobsplus, OPM-EES/DIER, MSPC/FSWS, MHA/Environmental Health Officer, Trade Unions, MIV/NGOs	All relevant actors, which are part of the NRM, use the NRM and cooperate better in increasing numbers of identified victims and providing them with appropriate assistance and protection measures, in accordance with their respective mandates.
	3. Through the NRM, develop a centralised system for data collection on victims of THB, disaggregated by gender, age, country of origin and form of exploitation.	Lead: NRM Team, National Coordinator (IMC) Supporting: possible working group on data collection (MHSE/MPF, MSPC/FSWS, MFIN/NSO, MEYR/UM, MIV/NGOs, IOs)	National authorities use reliable data to understand the realities and trends of THB and develop and monitor more effective and targeted anti-trafficking measures and policies.
	4. Enhance the identification of victims of trafficking among asylum seekers and irregular migrants by building the capacity of asylum and migration officials.	Lead: OPM-EES/HRD, National Coordinator (IMC) Supporting: MHSE/MPF, VSA, AWAS, IPA, Jobsplus, OPM-EES/DIER, MSPC/FSWS, MHA/Environmental Health Officer, Trade Unions, MIV/NGOs	Increased capacities and skills of all relevant professionals (asylum officials, migration officials, as well as social workers, medical and other staff working at facilities for asylum seekers and detained migrants) working with and for third-country nationals including children, on indicators of human trafficking and the procedures to be followed. Keep record and find ways to improve rates of identification of victims of THB among third country nationals.

4.2 Strengthen the system of assistance to all victims (including potential victims) of trafficking	1. Set up specialised accommodation facilities for victims of THB with a sufficient number of places, adapted to the specific needs of women, men and children, and provided with adequate and sustainable funding.	Lead: NRM Team, OPM-EES/HRD, MSAA Supporting: MHSE/VSA, MSPC/FSWS, CPS, MIV/NGOs	National authorities establish additional specialised shelters for victims of human trafficking, which offer adequate and more effective care and protection according to the specific needs of victims and which also focus on ensuring the effective and sustainable reintegration of victims of THB in society and instigate more incentives for victims to cooperate with the police.
	2. Institutionalise co-operation with specialised NGOs providing support to victims by including NGOs in the NRM, establishing Memoranda of Understanding, and securing sustainable funding for the services provided.	Lead: OPM-EES/HRD, National Coordinator (IMC), NRM Team Supporting: MHSE/VSA, MSAA, MSPC/FSWS, MIV/NGOs	National authorities cooperate effectively with NGOs to develop or strengthen measures and policies to protect victims of THB, prevent risks of being re-trafficked and ensure effective and sustainable reintegration of victims of THB in society.
	3. Ensure that interpreters working with asylum seekers and victims of crime are sensitised to THB.	Lead: MHSE/AWAS, IPA Supporting: MSPC/FSWS, MIV/NGOs.	Interpreters working with asylum seekers and victims of crime understand the specific needs and vulnerabilities of victims of THB.
	4. Ensure that potential victims of THB are given information on their rights in a proactive manner, regardless of their willingness to cooperate in the criminal investigation, taking into account the victim's age, maturity, intellectual and emotional capacity, literacy and any mental, physical, or other disability which may affect the ability to understand.	Lead: National Coordinator (IMC), First Responders (once they are appointed) Supporting: OPM-EES/HRD, DIER, MHSE/MPF, VSA, AWAS, IPA, Jobsplus, MSPC/FSWS, MHA/Environmental Health Officers, Trade Unions, MIV/NGOs	National authorities and frontline professionals are aware of all the rights of potential victims of THB and inform them properly and as early as possible on these rights and on how to access them.

4.3 Facilitate temporary residency permits	1. Assess the possibility of expanding the grounds for granting temporary residence permits to victims of THB based on their personal situation in accordance with the Council of Europe Convention on Action against Trafficking in Human Beings.	Lead: MHSE/Identità Supporting: MHSE/MPF, MJR	Victims of THB who cannot co-operate with the authorities in the investigation/prosecution are enabled to stay in Malta when their safety, state of health, family situation or some other factors require it.
4.4 Enhance legal assistance and free legal aid	1. Ensure accessibility and build capacity within the legal aid system to support victims of THB adequately.	Lead: MHSE, NRM Team, MJR/Legal Aid Agency, Supporting: MSPC/FSWS, private law firms which provide pro bono services MIV/NGOs, Chamber of Advocates	The Legal Aid Agency ensures it has the capacity to provide free legal aid which is accessible.
	2. Ensure adequate funding for legal assistance and free legal aid for victims of THB through the legal aid structure or any other government entities supporting victims of human trafficking.	Lead: MJR/Legal Aid Agency, MHSE/VSA Supporting: MIV/NGOs	Lawyers are made available to victims of trafficking before, during and after criminal proceedings through the legal Aid structure or any other government entities supporting victims of human trafficking.
4.5 Guarantee effective access to compensation	1. Increase the availability of training for Judges and lawyers.	Lead: MJR/Legal Aid Agency, National Coordinator (IMC) Supporting: MJR/Judicial Studies Committee, Chamber of Advocates	Increased knowledge of the importance of compensation awards to victims of trafficking through criminal and civil proceedings.
	2. Envisage the adoption of a procedure through which victims of THB are entitled to obtain a decision on compensation by the offender, for material (including lost earnings) and non-material damage as part of the criminal trial.	Lead: MHSE/VSA Supporting: OPM-EES/National Coordinator (IMC)/CJLA WG	Increased knowledge by Judges of possible measures to ensure that decisions on victim compensation by offenders are prioritised during the criminal proceedings rather than referring them to civil proceedings as encouraged by GRETA.

	3. Build the capacity of lawyers to seek compensation on behalf of the victims in criminal and civil proceedings and through the state fund in terms of the Criminal Injuries Compensation Scheme Regulations (S.L 9.12).	Lead: MHSE/VSA, MJR/Legal Aid Agency Supporting: Chamber of Advocates, MIV/NGOs	Keep data of requests for compensation.
4.6 Improve victim and witness protection	1. Identify procedural gaps in protecting victims and witnesses in cases of THB.	Lead: MHSE, OPM-EES/National Coordinator (IMC)/CJLA WG National Rapporteur /HTMC Supporting: MJR, MEYR/UM, MIV/NGOs	Strengthened procedural safeguards for victims and witnesses.
4.7 Provide opportunities for victims to rebuild their lives, reducing risk of re-trafficking	1. Strengthen effective access to the labour market for victims of THB and their economic and social inclusion through the provision of vocational training, language courses, mentorship, and job placement.	Lead: OPM-EES/HRD, MHSE/Identita, Jobsplus Supporting: MSPC/FSWS, CGBVDV, MIV/NGOs	Sustainable economic and social inclusion for victims of THB.
	2. Raise the awareness of the private sector and provide incentives for the creation of appropriate work opportunities for victims of trafficking.	Lead: OPM-EES/HRD, MHSE Supporting: MSPC/FSWS, MIV/NGOs, Chamber of Commerce, Chamber of SMEs, OPM-EES/MCESD, private sector, MEYR/MCAST	Increased employment opportunities for victims and reduced risk of re-victimisation.

4.8 Improve the comprehensive, multidisciplinary and proactive approach to child trafficking	1. Enhance knowledge of child trafficking .	Lead: MSPC/FSWS, CPS and its Child Protection Network (CPN), Commissioner for Children Supporting: OPM-EES/HRD, MHSE/AWAS, MPF, MIV/NGOs, MEYR/UM, MCAST	Improved understanding and detection of child trafficking.
	2. As part of the NRM, establish procedures for the identification and referral assistance of child victims of trafficking , which involve child specialists and ensure that the best interests of the child are the primary consideration in all proceedings relating to child victims of THB.	Lead: MSPC/FSWS, CPS and its CPN, Commissioner for Children Supporting: OPM-EES/HRD; MIV/NGOs, MEYR/UM, MCAST. MHSE/AWAS, MPF	National authorities and institutions as well as NGOs working in the field of children's rights act in a coordinated manner to prevent child trafficking and provide protection and support to child victims.
	3. Carry out systematic and appropriate risk assessments of vulnerabilities of unaccompanied and separated children and ensure access to accommodation that is safe, child-friendly and with services that respond to their needs.	Lead: MHSE/AWAS Supporting: OPM-EES/HRD, MHSE/MPF, MIV/NGOs, MEYR/UM, MCAST, Commissioner for Children, MSPC/FSWS, CPS and its CPN	AWAS has more capacity to provide adequate and immediate support and protection to unaccompanied children which have access to specialised and child-friendly facilities.
	4. Strengthen the legal guardianship system for child victims of THB.	Lead: MSPC/FSWS, CPS and its CPN, SCSA/ Central Authority Supporting: OPM-EES/HRD, MHSE/AWAS, MPF MSPC/ Commissioner for Children, MIV/NGOs, MEYR/UM	National authorities and practitioners promptly appoint legal guardians to act in the best interests of unaccompanied children who are at particular risk of being trafficked or are being trafficked and take measures to continue to reinforce the system of guardianship in light of Recommendation CM/Rec (2019)11 on Effective guardianship for unaccompanied and separated children in the context of migration .

	<p>5. Improve the system for age assessments using the Council of Europe standards and tools in this area.</p>	<p>Lead: OPM-EES/HRD, MHSE/AWAS, MPF, MSPC/FSWS, CPS and its CPN, Commissioner for Children</p> <p>Supporting: MIV/NGOs, MEYR/UM</p>	<p>National authorities and practitioners implement international standards when assessing the age of a potential victim of THB whose age is uncertain.</p>
	<p>6. Increase the understanding of children victims of THB of their rights with the help of interpreters who are sensitised to human trafficking and cultural mediators who are trained on children's rights, child safeguarding measures and on child trafficking.</p>	<p>Lead: OPM-EES/HRD, MHSE/AWAS, MSPC/FSWS, CPS</p> <p>Supporting: MHSE/MPF, Commissioner for Children, MIV/NGOs, MEYR/UM</p>	<p>National authorities ensure that child-friendly information is provided promptly to child victims of trafficking, who are foreign nationals, on their rights in a language they can understand, taking into account their maturity, intellectual and emotional capacity, literacy, and any mental, physical, or other disability which may affect the ability to understand.</p>

STRATEGIC AREA 5:

STRATEGIC PARTNERSHIPS AT REGIONAL AND INTERNATIONAL LEVELS TO TACKLE HUMAN TRAFFICKING

Strategic Goals	Specific Objectives	Competent institutions	Expected Results
5.1 Strengthen strategic partnerships at regional and international levels	1. Strengthen bilateral agreements with neighbouring countries, key source, and destination countries for THB to exchange information, promote exchanges of experience and dialogue, and support measures in specific geographical contexts.	Lead: MFET Supporting: MHSE/MPF, OPM-EES/ National Coordinator (IMC)/CJLA WG; MFIN/FIAU	National authorities organise and improve the exchange of information, and the sharing of intelligence, best practices and resources with the victims' country of origin, and of transit and/or exploitation.
	2. Make full use of all relevant EU agencies (Europol, Eurojust, Cepol, European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (eu-LISA), EU Judicial Cooperation Unit (Eurojust), European Border and Coast Guard Agency (Frontex), European Labour Authority to enhance capacity of operational actors, systematically exchange data to facilitate investigations in transnational cases of THB.	Lead: MHSE/MPF, MJR/AGO, any other competent Authority Supporting: MFIN/FIAU	National authorities activate existing partnerships and their resources to prevent human trafficking, protect victims, investigate cases and prosecute perpetrators including in the context of organised crime. The MPF and AGO, when there is willingness from other jurisdictions, launch joint investigation teams to disrupt organised crimes groups (OCGs) in the field of THB.
	3. Continue to strengthen and use multi-lateral diplomacy instruments to promote a human rights-based approach to combat human trafficking (CoE, OSCE, EC, ICMPD, UNODC) and improve legal standards, build capacities and exchange of good practices, and find support in developing policies and tools.	Lead: MFET Supporting: MHSE/MPF, MJR/AGO, MFIN/FIAU, OPM-EES/ National Coordinator (IMC)/CJLA WG	The Maltese authorities use multi-lateral instruments to further develop and strengthen international standards, ensure that all sectors benefit from capacity building opportunities and strengthen the comprehensive multi-agency response to THB.
	4. Improve the referral, return and assistance of foreign victims of trafficking through the development of a Transnational Referral Mechanism (TRM) with formalised standard operating procedures for cross-border THB cases.	Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC) Supporting: MHSE/MPF, MSPC/FSWS, NRM team	National authorities improve their assistance to victims of THB at all stages (identification, first assistance and protection, long term assistance and social inclusion, criminal and civil proceedings), and ensure the safe and voluntary return of victims of THB to countries of origin.

8. NATIONAL ACTION PLAN FOR YEARS 1, 2, 3 AND 4 2024-2027

STRATEGIC AREA 1:

STRENGTHENING THE SUPPORTING ANTI-TRAFFICKING FRAMEWORK

Strategic Goal 1.1:

Strengthen national anti-trafficking bodies

Specific objectives	Expected result	Concrete action	Responsible institutions and partners	Target date
1. Identify which entity should fulfil the role of the National Coordinator (currently the IMC) and the National Rapporteur (currently the HTMC)	OPM-EES and MHSE, with the support of the National Coordinator and National Rapporteur adopts and implements comprehensive anti-trafficking policies.	1. Conduct an analysis of international practices on establishing a National Coordinator and NREM bodies, in line with different requirements. 2. Conduct internal consultations and assessments of possible bodies who could play the role of NREM. 3. Conduct impact assessments on several identified options establishing NREM and National Coordinator. 4. Propose legislative changes in line with impact assessment. 5. Equip NREM and National Coordinator with human and technical resources.	Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC)	YEAR 1-2 YEAR 1-2 YEAR 1-2 YEAR 1-3 YEAR 2-4
2. Define the roles of the National Coordinator and the National Rapporteur to increase clarity, sustainability, and authority of the institutions.	OPM-EES and MHSE, with the support of the National Coordinator and the National Rapporteur, adopts and implements anti-trafficking policies.	1. Conduct a legal review of possible ways of establishing both bodies in legislation and by-laws to identify the best possible option with an impact assessment. 2. Prepare legal proposals (legal amendments/by-laws etc) in line with impact assessment. 3. Prepare terms of reference for members of each institution in consultation with the relevant authorities.	Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC)	YEAR 2-3
3. Address Strategic goal 4.1/ Specific Objective 1 and identify and legally define which entity/ies should be responsible for the National Referral Mechanism and who should manage it.	The NRM is established and operational.	1. Carry out a mapping of the different options of where the NRM could be established and conduct a legal review and impact assessment of what this would entail. 2. Prepare legal proposals (legal amendments/by-laws etc) in line with impact assessment.	Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC)	YEAR 2-4

Strategic Goal 1.2:**Strengthen institutional capacities**

Specific objectives	Expected result	Concrete action	Responsible institutions and partners	Target date
1. Ensure inter-agency cooperation through thematic Working Groups to support the National Coordinator in devising and implementing national action plans.	Authorities gain clearer insights in specific areas of the national action plan in particular in the field of prevention and protection including with regards to child trafficking, international partnerships and formulating targeted measures to form part of the NAP accordingly.	1. Identify the scope of such Working Groups. 2. Identify the topics to be discussed and the material which is to be presented to target the scope of the Working Groups. 3. Designate authorities and agencies and other relevant stakeholders as members of the working groups. 4. Determine Chair of each WG and frequency of the meeting.	Lead: OPM-EES/HRD, National Coordinator	YEAR 1-4

Strategic Goal 1.3:**Improve the legal and regulatory framework**

Specific objectives	Expected result	Concrete action	Responsible institutions and partners	Target date
1. Plan reforms, with a view to addressing the urgent recommendations made by GRETA.	National authorities continue to improve the legislative framework according to international standards.	1. Convene CJLA WG as necessary. 2. Continue to review the relevant GRETA recommendations and the action of the NAP which require legislative changes as outlined in the NAP (establishment of the NRM, identify the national coordinator and national rapporteur; address the legislative and administrative loopholes to address online recruitment and the monitoring of IT platforms; improve the labour standards institutional framework and ensure that both DIER and Jobsplus have a clear mandate with regards to THB and assess the different options for legislative changes. 3. Agree on the best option per need and produce a roadmap with the set priorities, expected results, and milestones. 4. Review recommendations and establish priority legislative changes.	Lead: OPM-EES/National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC) Supporting: OPM-EES/HRD, MJR	YEAR 1-2

2. Evaluate the possibility to introduce as an aggravating circumstance the offence of THB committed against a child regardless of the means used.	National authorities should consider proposals to continue to improve the legislative framework according to international standards, child trafficking cases are prosecuted and dissuasive penalties are imposed.	1. Conduct the legislative review of the respective provisions of the Criminal Code. 2. Prepare the draft law with supporting documents (impact assessment, justification to harmonise legislation with international standards).	Lead: OPM-EES/National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC) Supporting: OPM-EES/HRD, MJR	YEAR 1-2
3. Review laws and regulations, and make proposals as necessary to facilitate financial investigations, asset seizures, and forfeitures in human trafficking cases.	National authorities should consider proposals to continue to improve the legislative framework according to international standards. Increased number of financial investigations are conducted, and data is kept of the amount of assets seized.	1. Conduct the legislative review of the respective provisions of the Criminal Code. 2. Make recommendations to legislation if deemed necessary on the basis of the review.	Lead: OPM-EES/National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC) Supporting: OPM-EES/HRD, MJR	YEAR 1-3
4. Evaluate the possibility of strengthening legislation to use confiscated assets for victim compensation.	National authorities should consider proposals to continue to improve the legislative framework according to international standards. Confiscated assets are used to compensate victims of THB.	1. Conduct the legislative review of the respective provisions of the Criminal Code. 2. Prepare the draft law with supporting documents (impact assessment, justification to harmonise legislation with international standards).	Lead: OPM-EES/National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC) Supporting: OPM-EES/HRD, MJR	YEAR 1-3

5. Amend/Repeal the White Slave Traffic Ordinance Act and remove it from the statute.	Assess whether any legislation should be repealed.	<p>1. Compare and analyse the value of the provisions of the White Slave Traffic Ordinance Act against the Criminal Code.</p> <p>2. Seek ways to change the name of the Act and avoid duplications with the CC with a consolidated legislative proposal.</p>	<p>Lead: OPM-EES/National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC)</p> <p>Supporting: OPM-EES/HRD, MJR</p>	YEAR 1-2
6. Ensure that the legal framework is in place to allow the police to investigate and inspect licenced as well as unlicenced premises where there are reasonable grounds to believe that human trafficking and exploitation are taking place.	Improved capabilities and response of police officers to combat THB.	<p>1. Analyse the existing legislation in light of needs and practices and make proposals.</p> <p>2. Regularise/Licence high-risk operations including massage parlours, adult entertainment and other areas.</p>	<p>Lead: OPM-EES/HRD, National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC)</p> <p>Supporting: OPM-EES/Trade Licencing Unit, MHSE/MPF</p>	<p>YEAR 1-2</p> <p>YEAR 2</p>

STRATEGIC AREA 2:

ENSURING TARGETED PREVENTION AND EARLY IDENTIFICATION OF POTENTIAL VICTIMS AND PERSONS AT RISK

Strategic Goal 2.1:

Increase capacities in addressing root causes and reducing vulnerabilities and conducting targeted awareness/outreach activities

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Increase and utilise knowledge of THB by drafting biannual situation reports on the latest developments and threats.	Situation reports based on statistics, NRM data, operational intelligence, surveys, other relevant reports, open-source information, are available and updated regularly.	<p>1. Develop the NRM database with a 'duty to notify' system.</p> <p>2. Establish a dedicated team to compile and analyse data for the situation reports based on the information of the NRM and outside sources.</p> <p>3. Set up regular data sharing agreements with key stakeholders for timely information.</p> <p>4. Organise quarterly coordination meetings among the competent institutions to review the data and with end-users of the reports to ensure relevance and usefulness.</p>	<p>Lead: OPM-EES/ HRD, National Coordinator (IMC), National Rapporteur (HTMC)</p> <p>Supporting: CGBVDV, MEYR/ UM, MIV/NGOs, IOs.</p>	YEAR 2, 4 (for all actions)
2. Improve understanding of THB through research on at-risk groups and root causes.	Improved prevention policies and measures targeting key risk factors and at-risk groups.	<p>1. Carry out a desk review of research in the field of THB and develop a legal framework to fulfil the national functions through a research strategy and include possible partnerships (University of Malta). Possible topics for the research strategy:</p> <ul style="list-style-type: none"> - child trafficking (Maltese and foreign victims) including in the context of cases of sexual exploitation and sexual abuse of children; - vulnerabilities to THB in Malta including risks for persons with physical and mental disabilities; - on Maltese national who are victims of trafficking; - the potential risks of human trafficking, exploitation, and abuse through existing migration channels with proposed measures to reduce these risks; - the nexus between asylum and THB; - online recruitment and exploitation; - access to compensation. <p>2. Envisage the establishment of a specific funding process (commissioning fund) to commission specific research in line with the research strategy.</p> <p>3. Envisage ways to gather insights and contributions from victims (experts by experience) of VoT with, for example, the establishment of an advisory panel.</p> <p>4. Implement the research strategy.</p>	<p>Lead: OPM-EES/ HRD, National Coordinator (IMC), National Rapporteur (HTMC)</p> <p>Supporting: CGBVDV, MEYR/ UM, MCAST, MIV/NGOs, IOs.</p>	<p>YEAR 1-4</p> <p>YEAR 1-2</p> <p>YEAR 1-2</p> <p>YEAR 3</p>

3. Ensure synergies with sectors working on combatting and eliminating the root causes of THB such as poverty, discrimination and early school leave, by increasing awareness on the related risks of human trafficking and formulating cross-sectoral policy priorities.	National authorities collaborate better and work regularly with NGOs to target root causes and work on reducing them effectively. Respective policies on diminishing poverty, discrimination, and early school leave positively impact and decrease the root causes of THB.	1. Identify and use relevant strategies and policies which could be used for more transversal actions by integrating THB in these strategies and policies.	Lead: OPM-EES/HRD, National Coordinator (IMC)	On-going
		2. Issue a clear joint statement articulating why these factors create risks of THB.	Supporting: MIV/NGOs, IOs, MSPC/FSWS	On-going
4. Promote and facilitate pathways for legal migration.	Labour migrants have legal migration opportunities and enhanced knowledge about legal pathways and their rights in Malta.	1. Prepare information materials (leaflets) about work rights in Malta (co-produced with people with lived experience of migration and/or experience) in different relevant languages using the outputs of the DG REFORM project with IOM on Pre departure Information Measures.	Lead: OPM-EES/HRD, MHSE/Identita	YEAR 1-2
		2. Identita disseminates leaflets to the migrant population upon entry into Malta, employers, and further on to targeted vulnerable groups.	Supporting: MHSE/IPA, AWAS, Jobsplus, OPM-EES/DIER, MCESD, and EU National Liaison Officers, Chamber of Commerce, Chamber of SMEs, private sector, Trade Unions, MIV/NGOs, IOs.	YEAR 2-3
		3. Seek ways to disseminate these leaflets to existing embassies.		YEAR 2-4
		4. Organise regular information sessions for labour migrants about their legal migration rights when travelling across Europe to prevent THB from Malta into Europe/elsewhere.		On-going
		5. Train and support all relevant entities such as border officials, Identita, Jobsplus, DIER, trade unions, employers, on migration channels to ensure that people are correctly advised about their options. CGBVDV to consider including THB in its training for professionals working with migrants on identifying violence and abuse.		On-going

5. Address existing risks of THB of labour migrants.	Labour migrants are better protected from risks of trafficking for the purpose of labour exploitation through improved information on their rights, strengthened reporting mechanisms, and more flexibility in leaving employment in case of abuse and supporting measures to find new employment.	1. Create accessible channels for anonymous reporting by migrant workers and ensure that these are known and communicated in relevant languages to the migrant population.	Lead: OPM-EES/HRD, MHSE/Identita, Jobsplus	YEAR 2-3
		2. Review the timeframe of 10 days to find a new employment for migrant workers with an impact assessment.	Supporting: OPM-EES/DIER, MCESD, Chamber of Commerce, Chamber of SMEs, Trade Unions, private sector, MIV/NGOs, IOs	YEAR 3-4
6. Continue to raise public awareness on THB, its manifestation and risks, and where to report cases and seek assistance.	Increased societal recognition of THB and its signs.	<p>1. Prepare a communication strategy which outlines the key messages that need to be shared to different target groups.</p> <p>2. Cooperate with the University of Malta to identify communication patterns used by at-risk groups identified to select the most effective communication means.</p> <p>3. Develop/continue campaigns using a variety of medium accordingly by allocating the necessary resources.</p>	<p>Lead: OPM-EES/HRD, National Coordinator (IMC), MEYR/UM, MCAST</p> <p>Supporting: MIV/NGOs, National & Private Media Service Providers, MSPC/FSWS</p>	YEAR 2
7. Evaluate and improve the impact of awareness-raising campaigns.	The general public is more aware of trafficking and how it manifests in Malta, and is aware of the ways to report their concerns.	1. Develop a Monitoring and Evaluation Framework for awareness raising campaigns in cooperation with the University of Malta and/or other academic institutions.	Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC), MEYR/UM, MCAST	YEAR 1
		2. University of Malta to carry out an evaluation of the campaigns via surveys/hotlines/an assessment of the data gathered under the NRM etc/consultations including with victims.	Supporting: MEYR, Commissioner for Children, schools, OPM/Office of the Communication Coordinators	YEAR 2
8. Discourage demand that fosters human trafficking through awareness sessions carried out in schools.	School children are educated about trafficking, exploitation, gender equality, and the importance of human rights.	<p>1. Assess opportunities to integrate human trafficking in a human rights curriculum which would be adapted to specific age groups.</p> <p>2. Develop education materials on gender-based violence, trafficking, exploitation adapted to specific age groups, and integrate them in the school curricula.</p>	Lead: OPM-EES/HRD, CGBVDV, MEYR/MCAST, MSPC/FSWS, CPS.	<p>YEAR 2</p> <p>YEAR 3-4</p>

9. Collaborate with tech companies to combat online recruitment and exploitation of THB.	National authorities establish stronger public-private partnerships to address online THB.	1. Explore partnerships with various tech companies on the basis of the research carried out in 2.1/2 above.	Lead: OPM-EES/National Coordinator (IMC), OPM-EEP/MCA, Private Sector (IT companies) Supporting: OPM-EES/DIER, MCESD, Chamber of Commerce, Chamber of SMEs, MHSE/Jobplus, MHSE/MPF	YEAR 2-4
10. Enhance awareness raising efforts for high-risk groups.	At-risk groups are better informed and empowered to recognise, avoid, and report THB.	1. FSWS continues to carry out information sessions for migrants via their communities, sex workers and other identified at-risk groups using cultural mediators and consider seeking IOM's support. 2. Develop information materials with the support of people with lived experience, using different mediums (electronic and printed) and using communication patterns identified in the research carried out for Strategic Goal 2.1/Specific Objective 4. 3. Jobplus continues to distribute information materials and the dissemination of anonymous reporting hotline. 4. Identify where else these information materials should be disseminated and by whom, and in which languages they should be translated (Spanish, Portuguese etc) via NGOs – special consideration should be given to language schools and detention centres (UNHCR).	Lead: OPM-EES/HRD Supporting: MHSE/AWAS, MPF, VSA, Jobplus, OPM-EES/DIER, CGBVDV, Trade Unions, MSPC/FSWS, CPS, MIV/NGOs, IOs	YEAR 2-4
11. Equip frontline professionals for early identification of potential victims.	Frontline professionals are trained and better resourced to identify potential victims of THB at an early stage.	1. Carry out a training needs assessment and consider identifying a training focal point per sector. 2. Carry out a mapping of existing sector-specific indicators of THB, fine tune them and develop new ones where necessary. 3. Plan/Initiate training on identifying and communicating with victims of human trafficking using existing training curricula (e.g: IOM, CGBVDV).	Lead: MHSE/Identita, AWAS, VSA, IPA, MPF Supporting: MSPC/FSWS, MHSE/Jobplus, OPM-EES/DIER, MHA, MIV/NGOs MPF/immigration officials at MIA/ports	YEAR 1-4

12. Ensure that labour standards and the institutional framework are in place to allow Jobsplus and DIER to carry out inspections in a complementary manner to identify victims of labour trafficking.	Jobsplus, DIER and other agencies involved in upholding labour standards have sufficient mandate, and capacity to identify victims of labour trafficking.	<p>1. Assess the existing labour standards institutional framework and ensure that both DIER and Jobsplus have a clear mandate with regards to THB.</p> <p>2. Create a common coordination framework between DIER and Jobsplus to ensure a consistent and complimentary approach to inspections to identify cases of THB for the purpose of labour exploitation (a working group).</p> <p>3. Jobsplus collaborates and trains other inspectorates/entities with inspectorate functions (DIER) to carry out inspections.</p>	<p>Lead: OPM-EES/National Coordinator (IMC)/CJLA WG, National Rapporteur (HTMC), MHSE/ Jobsplus, OPM-EES/DIER</p> <p>Supporting: MJR</p>	YEAR 1-4
13. Increase outreach work in high-risk sectors.	The community police collaborate more efficiently and regularly with labour inspectors, NGOs and other relevant actors and identifies more victims of THB in high-risk sectors such as construction, cleaning, domestic work, fishing, massage parlours, and adult entertainment and criminal exploitation with increased intelligence and data.	<p>1. Identify high-risk groups through a police-led 'Tactical Tasking & Coordination Group (TTCG).</p> <p>2. Prepare a strategy for outreach work and inspections.</p> <p>3. Through the TTCG, relevant units within the MPF, including District and Community Officers, and other relevant bodies (Jobsplus, DIER, NGOs etc) undertake outreach work in identified high risk sectors.</p> <p>4. Outcomes of all outreach work is passed back into the Malta Police intelligence system.</p>	<p>Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC)</p> <p>Supporting: MHSE/AWAS, MPF, Jobsplus, OPM-EES/DIER, MSPC/ Appoġġ, MHA, MIV/NGOs</p>	YEAR 1-4
14. Tackle sexual exploitation in high-risk operations including massage parlours, adult entertainment and other areas, through licencing and oversight.	National authorities licence massage parlours, and other high-risk operations, which can be more effectively monitored to detect more trafficking cases.	<p>1. Conduct a risk assessment to make a statement for a licencing regime taking into account the risk assessment of money laundering related to organised crime risks in Malta of 2021.</p> <p>2. Identify which body would be responsible for the licencing of massage parlours and which body would carry out visits and monitor compliance.</p> <p>3. Prepare a legislative and administrative proposal.</p> <p>4. Training delivered to relevant officers within MPF and Jobsplus on conducting licencing visits to massage parlours (and other legislated establishments), and on how to identify THB.</p>	<p>Lead: OPM-EES/HRD, National Rapporteur (HTMC), MEEP/ Trade Licencing Unit, MHSE/ Jobsplus</p> <p>Supporting: MHSE/MPF, OPM-EES/DIER</p>	<p>YEAR 1-2</p> <p>YEAR 1-2</p> <p>YEAR 2-4</p> <p>YEAR 2-4</p>

15. Protect migrant workers, especially third country nationals, from labour trafficking by enforcing stringent regulations and oversight of recruitment agencies.	National authorities regulate more efficiently and effectively recruitment companies, safeguarding the rights of labour migrants.	1. Support the implementation of the new draft regulation on recruitment companies with training and disseminating information on its impact among all relevant target groups including in sending countries.	Lead: MHSE/ Jobsplus Supporting: MHSE/MPF, OPM-EES/DIER	YEAR 2-4
16. Businesses undertake due diligence throughout their operations and supply chains to reduce risks of THB, particularly in sectors known for exploitative practices.	Businesses introduce anti-trafficking measures in their supply chains, such as control mechanisms, fair trade and other responsible measures and sanctions, and use due diligence and risk assessment measures to lower the risks of being involved, directly or indirectly, in trafficking for labour exploitation and report publicly about these measures.	<p>1. The FIAU in collaboration with the FAST initiative issues a guidance publication for the private sector to raise awareness on THB.</p> <p>2. Analyse the mapping report of private sector entities and identify companies which have been identified in scope of the EU Corporate Sustainability Reporting Directive (EU CSRD) and in line with the newly adopted EU Corporate Sustainable Due Diligence Directive (EU CSDDD), establish collaboration with the Chamber of Commerce and of SMEs and invite relevant companies to produce statements on their engagement to combat THB with concrete proposals for actions.</p> <p>3. Launch a campaign to inform and encourage both businesses and the public on the advantages and benefits of fair trade and responsible measures.</p> <p>4. Collaborate with business associations to develop templates businesses can use to assess risks in their supply chain and report on their efforts. The checklist developed by IOM for the private sector can be used.</p>	<p>Lead: OPM-EES/ HRD, National Coordinator (IMC), National Rapporteur (HTMC)</p> <p>Supporting: MHSE/Jobsplus, OPM-EES/DIER, MFIN/FIAU and regulatory authorities (Malta Financial Services Authority, Malta Business Registry), Chamber of Commerce, Chamber of SMEs, OPM-EES/MCESD, Business associations, trade unions, individual businesses (who may work with auditing firms, legal firms and risk assessment companies)</p>	<p>YEAR 1-2</p> <p>YEAR 1-2</p> <p>YEAR 2-4</p> <p>YEAR 2-4</p>

Strategic Goal 2.2:

Implement specific measures to address child trafficking

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Improve public awareness on the different manifestations of child trafficking by elaborating dedicated campaigns in cooperation with specialised child rights' institutions and NGOs.	Increased public awareness of child trafficking and its indicators and early identification of children at risk.	1. Include 'child trafficking' in the communications strategy developed under Strategic Goal 1.1/Specific Objective 6. 2. Elaborate dedicated campaigns in collaboration with specialised child rights' institutions and NGOs.	Lead: MSPC/ FSWS, CPS, Commissioner for Children, MEYR/MCAST Supporting: MHSE/AWAS, MPF, MIV/NGOs working on child rights' issues, children and youth groups including from different communities	YEAR 1-2 YEAR 2-4
2. Improve the awareness of THB among children and young people, in particular of the risks related to social media and the Internet, through education and targeted child-friendly campaigns.	Children are empowered to recognise, avoid and report trafficking risks.	1. Develop a national framework for age-appropriate messaging on trafficking, across all school levels and ages. 2. Create child-friendly education resources for use in schools, integrating materials into the standard curriculum. 3. Explore partnerships with tech companies to incorporate anti-trafficking messages into child-targeted apps, social media, and online games.	Lead: MSPC/ FSWS, CPS, Commissioner for Children, MEYR Supporting: MHSE/AWAS, MPF, MIV/NGOs working on child rights' issues, children and youth groups including from different communities	YEAR 1-2 YEAR 2-4 YEAR 1-2
3. Improve reporting mechanisms for children at risk.	Children at risk can easily access a helpline managed by trained professionals to seek assistance, leading to better protection and early identification of potential victims.	1. Map existing reporting mechanisms used by child victims. 2. Conduct an impact assessment on the effective use of existing reporting mechanisms, especially hotlines. 3. Develop materials for children to report abuse, including child trafficking. 4. Launch training based on the assessment.	Lead: MSPC/ FSWS, CPS, Commissioner for Children Supporting: MIV/NGOs	YEAR 1-2 YEAR 1-2 YEAR 2-4 YEAR 2-4
4. Increase collaboration with the education system to include human trafficking topics.	Children in schools are better informed about trafficking risks.	1. Identify a dedicated focal point within MEYR to address human trafficking by improving support to teachers, reporting mechanisms in schools, awareness curriculum for children in schools. 2. Address the associated actions under specific goal 2.1/specific objective 8.	Lead: OPM-EES/ HRD, MSPC/ FSWS, CPS, MEYR	YEAR 1-2 YEAR 2-4

<p>5. Improve early identification of children at risk of trafficking by training education psycho-social services professionals and teachers and other education staff, social workers, healthcare professionals and legal guardians, on indicators of child trafficking.</p>	<p>Professionals can better identify children at risk and take appropriate actions to prevent exploitation.</p>	<ol style="list-style-type: none"> 1. Conduct a training needs assessment to train on indicators of child trafficking. 2. Launch training based on the conducted assessment. 3. Introduce safeguarding leads in schools and include trafficking within their remit. 4. Introduce mandatory reporting by teachers to these safeguarding leads. 	<p>Lead: MSPC/ FSWS, MEYR/ National School Support within MEYR, MCAST, MHA</p> <p>Supporting: OPM-EES/HRD, MEYR/UM</p>	<p>YEAR 1-2</p> <p>YEAR 2-4</p> <p>YEAR 2-4</p> <p>YEAR 2-4</p>
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STRATEGIC AREA 3:

INCREASING REPORTING BY VICTIMS, EFFECTIVE INVESTIGATION AND PROSECUTION OF TRAFFICKERS

Strategic Goal 3.1: Modernise the MPF

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Strengthen the specialisation, organisation, and functioning of the MPF to effectively counter THB.	Enhanced capability leading to: <ul style="list-style-type: none"> - Improved victim identification. - Improved treatment of victims. - Increased number and quality of human trafficking investigations. - Increased confidence of partners and of the public. 	<p>1. Create a dedicated human trafficking team within the Malta Police Force whose primary focus is improved investigation and prosecution of THB.</p> <p>2. Ensure that any staff investigating THB receive ongoing specialist training to improve performance on investigative outcomes.</p> <p>3. Improve training for all MPF staff in victim identification and basic skills in countering human trafficking leading to more victims being identified, protected and an increased number of investigations and prosecutions.</p> <p>4. Through internal processes and procedures, the MPF to ensure that all allegations of THB are:</p> <ul style="list-style-type: none"> • Recorded and thoroughly checked for elements of crime. • Referred to and investigated by the Human Trafficking Team (or supporting officers). <p>5. In line with legislation & convention, the MPF should investigate allegations of human trafficking irrespective of a named victim.</p> <p>6. The MPF to conduct a 'historical case review' of THB prosecutions currently within the judicial process, to identify areas of both good practice and that requiring improvement – and for intelligence exploitation.</p> <p>7. The MPF create a strategic Action Plan, identifying short, medium- and long-term objectives to deliver effective change in the areas of intelligence gathering, investigation and prosecution (of THB) and engagement.</p> <p>8. The MPF (Community Policing Teams), working in partnership with other State bodies and Civil Society engage in proactive engagement and welfare outreach visits to establishments where THB may be present.</p> <p>9. To support modernisation and effective operational impact on human trafficking, the MPF submit a funding bid to the EU Internal Security Fund (ISF), to deliver:</p> <ul style="list-style-type: none"> • Training. • On-going mentoring. • Provision of IT to support implementation of a NIM. 	<p>Lead: MHSE/MPF/VSA, MSPC/FSWS</p> <p>Supporting: MJR/AGO, MEYR/UM</p>	<p>Year 1-2</p> <p>Ongoing for all</p>

2. Implement advanced intelligence systems and methodologies for enhanced data collection including by introducing a modern, full-featured police records management system.	The MPF addresses cases of THB more effectively, assessing the investigators' workload, adopts investigation strategies and monitors trends of THB with accurate data collection on crime, and intelligence.	1. Review the National Intelligence Model (NIM) against the structures and demand of the MPF. 2. Implement the NIM, or relevant aspects, within the MPF.	Lead: MHSE/MPF Supporting: MEYR/UM	YEAR 1-2 YEAR 2-4
3. Strengthen intelligence-led investigations with a National Intelligence Model (NIM) and effective use of advanced techniques.	All operational officers and staff of the MPF collect, develop and disseminate systematically intelligence to make intelligence-led decisions about priorities and tactical options (regarding THB and all other crime).	All MPF staff trained in: <ul style="list-style-type: none"> • An intelligence led approach to policing. • NIM. 	Lead: MHSE/MPF Supporting: MEYR/UM	YEAR 3-4
4. Develop and implement a Force-wide Tasking & Coordination Group (TCG) in line with the NIM.	Tasking is intelligence led and prioritised in line with strategic priorities.	1. Implement a police-led 'Tactical & Tasking Coordination Group' (outcome of NIM), that includes relevant police units and government bodies.	Lead: MHSE/MPF Supporting: MEYR/UM	YEAR 3-4
5. Improve intelligence led investigations with electronic intelligence and evidence and enhance identification of victims recruited and exploited online.	The MPF increases the collection of IT intelligence and evidence to support THB investigations. Increased rates of identification of victims of trafficking through proactive use of the internet.	1. Needs analysis undertaken re capacity & capability – IT provision (hardware & software); skills, and training need and on existing blockages to online covert investigations in light also of the relevant provisions of the Council of Europe Cybercrime Convention. 2. IT uplift as per Needs Analysis. 3. MPF Intelligence Unit and THB Team trained in intelligence led on-line intelligence gathering and evidence gathering.	Lead: MHSE/MPF Supporting: private sector, MEYR/UM	YEAR 1-2 YEAR 1-3 YEAR 2-4

6. Improve proactive investigation capability through intelligence-led operations supported by effective use of covert techniques, financial investigations, forensic strategies and analysis.	The MPF improves the quality of evidence obtained against THB suspects to increase evidence led prosecutions with less reliance on victim testimony.	1. Needs Analysis undertaken concerning provision, capability, and training needs related to proactive investigations.	Lead: MHSE/MPF	YEAR 1-2
		2. FI embedded within THB Team.		YEAR 1-2
		3. Deliver training concerning improved skill set on proactive policing and related opportunities – FI, forensic, etc.		YEAR 2-4

Strategic Goal 3.2:

Modernise the Criminal Justice System within the systems of the AGO, MPF and CSA

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Improve the efficiency and the quality of the criminal justice system in managing cases of THB with Case Management Systems for MPF, AGO and CSA which should be integrated.	Integrated system ensures the integrity of data in managing THB cases during the criminal trial.	1. Scope current systems and needs, focusing on interoperability of a paperless system using opportunities of the new TSI project with the Ministry for Justice. 2. Consider options for, and deliver, interoperability including procurement of paperless case management system.	Lead: MJR/CSA Supporting: MHSE/MPF, MJR/AGO, MEYR/UM	YEAR 2-4
2. Provide more training opportunities to the judiciary on the subject of THB.	Trained judges have better capacity, skills, and understanding of THB forms and crimes.	1. Training needs analysis of judiciary undertaken. 2. Training of judiciary, using also the new updated version of the Council of Europe HELP course on trafficking in human beings for legal professionals.	Lead: MJR Supporting: Judicial Studies Committee	YEAR 1-2 YEAR 1-2

Strategic Goal 3.3:**Improve Strategic Management and Partnership**

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Enhance coordination and cooperation within the criminal justice system to address gaps and needs in THB cases.	Regular strategic initiatives improve the responses of the criminal justice system to THB cases.	1. Gap Analysis conducted on the criminal justice system in context of THB. 2. Establish a plan for the implementation of recommendations delivered by the National Coordinator (IMC)/CJLAWG on aspects identified in the Gap Analysis.	Lead: MJR Supporting: MJR/AGO, CSA; MHSE/MPF; MEYR/UM	YEAR 1-2 YEAR 2-4
2. Boost coordination and cooperation between frontline professionals, notably from civil society and law enforcement, to enhance engagement, cooperation and trust needed to combat human trafficking effectively.	Improved stakeholder engagement, cooperation, and trust form a genuine partnership and provide diverse perspectives on all aspects of THB.	1. Establish an effective independent advisory group composed of frontliners including civil society organisations.	Lead: MHSE/MPF, MSPC/FSWS, MHSE/ Jobsplus, AWAS OPM-EES/ DIER, MIV/ NGOs Supporting: National Coordinator (IMC)	YEAR 1-4

Strategic Goal 3.4:**Enhance Financial Investigations to Disrupt Trafficking Networks**

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Improve capacities in the area of financial investigations and asset recovery in THB cases.	<p>Strengthened capacity of competent institutions to conduct effective financial investigations to improve THB investigations and asset recovery leading to better positive outcomes and compensation awarded to victims.</p> <p>Increased seizures of financial assets of traffickers.</p>	<p>1. Continue training efforts in relation to financial intelligence to the Malta Police Force by the FIAU as required. Deliver training and investigation methodologies and opportunities, including on identifying criminal assets linked to this crime and the perpetrators between the concerned and the competent authorities.</p> <p>2. Collect and share international good practices on 'personal impact assessments' which concerns the harm the victim has suffered, including the financial gain from the exploitation of the victim, with a view to supporting compensation claims in court.</p>	<p>Lead: MHSE/MPF</p> <p>Supporting: MFIN/FIAU, MJR/ARB, MEYR/UM</p>	YEAR 1-4 (all actions)
2. Work with financial institutions to identify suspected money laundering of proceeds of THB.	Improved detection of suspicious financial activities, improved tracing of criminal assets and confiscation of criminal property.	1. The FIAU sets up an HT/MS Public-Private Partnership (PPP) which will increase co-operation with financial and credit institutions to share information, modus operandi and good practices, to improve knowledge on THB and how financial and credit institutions can better report suspicious activity.	<p>Lead: MFIN/ FIAU</p> <p>Supporting: MJR/ARB, MHSE/MPF, Financial institutions, supervisory bodies and international partners</p>	YEAR 1-4

STRATEGIC AREA 4:

COMPREHENSIVE VICTIM PROTECTION, JUSTICE AND REMEDIES

Strategic Goal 4.1:

Improve victim identification and protection

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Develop and put into place a formalised National Referral Mechanism for victim identification, referral, assistance and protection, which follows a multi-disciplinary approach to victim identification.	All frontline professionals are required to effectively use the NRM, more victims are identified and provided assistance and specific, reliable and up-to-date data on the situation of THB in Malta is centralised and used.	<p>1. Establish a multidisciplinary Working Group that includes government agencies, NGOs, international organisations, and experts on human trafficking to collaborate on the development of the NRM.</p> <p>2. Use good practice models of NRMs and adapt it to the Maltese context by:</p> <ul style="list-style-type: none"> - identifying which will be the competent authority to operate the NRM and within the competent authority who will be the NRM decision makers and train them. - identifying what will be the agreed process of referrals and recording which will be operated by the competent authority. - assessing how to ensure a strong legal basis for the NRM which might require drafting new legislation. (See strategic area 1). <p>3. Develop clear guidelines and protocols that outline the procedures for identifying, referring, assisting, and protecting trafficking victims.</p> <p>4. Allocate appropriate resources, both financial and human, to support the functioning of the NRM.</p>	<p>Lead: OPM-EES/HRD, National Coordinator (IMC)</p> <p>Supporting: MHSE/MPF, VSA, AWAS, IPA, Jobsplus, OPM-EES/ DIER, MSPC/ FSWS, MHA/ Environmental Health Officer, Trade Unions, MIV/NGOs</p>	YEAR 1-4
2. Identify and train 'first responders' qualified and authorised to submit referrals of potential victims.	All relevant actors which are part of the NRM use the NRM and cooperate better in increasing numbers of identified victims and providing them with appropriate assistance and protection measures, in accordance with their respective mandates.	<p>1. Within the WG outlined above, discuss and decide which professionals should become 'first responders'.</p> <p>2. Conduct a training needs assessment to ensure that all first responders are regularly trained on THB, its indicators, high-risk groups and sectors.</p> <p>3. Train all first responders and develop a sustainable training plan.</p> <p>4. Establish supporting measures for 'first responders' against vicarious trauma.</p>	<p>Lead: OPM-EES/ HRD, National Coordinator (IMC)</p> <p>Supporting: MHSE/MPF, VSA, AWAS, IPA, Jobsplus, OPM-EES/ DIER, MSPC/ FSWS, MHA/ Environmental Health Officer, Trade Unions, MIV/NGOs</p>	<p>YEAR 1-2</p> <p>YEAR 1-2</p> <p>YEAR 1-2</p> <p>YEAR 2-4</p>

3. Through the NRM, develop a centralised system for data collection on victims of THB, disaggregated by gender, age, country of origin and form of exploitation.	National authorities use reliable data to understand the realities and trends of THB and develop and monitor more effective and targeted anti-trafficking measures and policies.	<p>1. The data gathered from the NRM is made accessible and useful for all relevant entities to use in their own work in response to THB.</p> <p>2. With the advice of researchers/data analysts, determine the data sets that would be useful to generate a wider picture of THB in Malta.</p> <p>3. Plan to publish NRM data twice a year using excel so that the data is more easily used by researchers and practitioners.</p>	<p>Lead: NRM Team, National Coordinator (IMC)</p> <p>Supporting: possible working group on data collection (MHSE/MPF, MSPC/FSWS, MFIN/NSO, MEYR/UM, MIV/NGOs, IOs)</p>	YEAR 2-4
4. Enhance the identification of victims of trafficking among asylum seekers and irregular migrants by building the capacity of asylum and migration official.	<p>Increased capacities and skills of all relevant professionals (asylum officials, migration officials, as well as social workers, medical and other staff working at facilities for asylum seekers and detained migrants) working with and for third country nationals including children, on indicators of human trafficking and the procedures to be followed.</p> <p>Keep record and find ways to improve rates of identification of victims of THB among third country nationals.</p>	<p>1. Develop and use indicators that are specific to this context.</p> <p>2. Develop training courses and supporting materials for asylum/migration related staff at ports, airports, detention and reception centres with an M&E framework, in order to carry out evaluations of the training received.</p> <p>3. Prepare a roadmap for the deployment of the training.</p> <p>4. Launch training.</p> <p>5. Evaluate training.</p>	<p>Lead: OPM-EES/HRD, National Coordinator (IMC)</p> <p>Supporting: MHSE/AWAS, IPA, MPF, MSPC/FSWS, MHA, MIV/NGOs</p>	<p>YEAR 1</p> <p>YEAR 1</p> <p>YEAR 1-2</p> <p>YEAR 2</p> <p>YEAR 3-4</p>

Strategic Goal 4.2:**Strengthen the system of assistance to all victims (including potential victims) of trafficking**

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Set up specialised accommodation facilities for victims of THB with a sufficient number of places, adapted to the specific needs of women, men and children, and provided with adequate and sustainable funding.	National authorities establish additional specialised shelters for victims of human trafficking, which offer adequate and more effective care and protection according to the specific needs of victims and which also focus on ensuring the effective and sustainable reintegration of victims of THB in society and instigate more incentives for victims to cooperate with the police.	<p>1. Through the WG mentioned above, carry out a needs assessment on the basis the caseload and current demand against the capacity of existing infrastructures.</p> <p>2. Develop a framework for accommodation provisions (type of accommodation and specifications with also longer-term needs based on the potential demand once the NRM is fully used).</p> <p>3. Plan for how the various accommodation could be secured (existing shelters/ housing, adapting/purchasing of block accommodation).</p> <p>4. Who will be responsible for oversight and management of the accommodation provision.</p> <p>5. Develop an indicative budget.</p> <p>6. Start developing minimum standards of care with a compliance mechanism for all services for victims of trafficking that receive funding from state budget.</p>	<p>Lead: NRM Team, OPM-EES/HRD, MSAA</p> <p>Supporting: MHSE/VSA, MSPC/FSWS, CPS, MIV/NGOs</p>	YEAR 3 (for all actions)
2. Institutionalise co-operation with specialised NGOs providing support to victims by including NGOs in the NRM, establishing Memoranda of understanding and securing sustainable funding for the services provided.	National authorities cooperate effectively with NGOs to develop or strengthen measures and policies to protect victims of THB, prevent risks of being re-trafficked and ensure effective and sustainable reintegration of victims of THB in society.	<p>1. Develop relationships and partnerships with NGOs to carry out roles in the NRM, with adequate funding to do this work.</p> <p>2. Establish MoUs and minimum standards of care accordingly or contracts where funding is provided.</p>	<p>Lead: OPM-EES/HRD, National Coordinator (IMC), NRM Team</p> <p>Supporting: MHSE/VSA, MSAA, MSPC/FSWS, MIV/NGOs</p>	<p>YEAR 1-2</p> <p>YEAR 2-4</p>

3. Ensure that interpreters working with asylum seekers, and victims of crime are sensitised to THB.	Interpreters working with asylum seekers and victims of crime understand the specific needs and vulnerabilities of victims of THB.	<p>1. IOM trains cultural mediators in particular in its project REVEALED.</p> <p>2. Train interpreters used in all sectors including in courts.</p> <p>3. Identify possible ways to use qualified and well-trained interpreters including from translation phone services.</p>	<p>Lead: MHSE/ AWAS, IPA</p> <p>Supporting: MSPC/FSWS, MIV/NGOs</p>	YEAR 1-4
4. Ensure that potential victims of THB are given information on their rights in a proactive manner, regardless of their willingness to cooperate in the criminal investigation, taking into account the victim's age, maturity, intellectual and emotional capacity, literacy and any mental, physical, or other disability which may affect the ability to understand.	National authorities and frontline professionals are aware of all the rights of potential victims of THB and inform them properly and as early as possible on these rights and on how to access them.	<p>1. Develop information materials explaining the rights of victims of THB including the reflection and recovery period (rights, entitlements and obligations) and on services available during that time and beyond including healthcare and mental health support to be offered as quickly as possible.</p> <p>2. Provide training.</p> <p>3. Disseminate this information in relevant places and during outreach sessions.</p>	<p>Lead: National Coordinator (IMC), First Responders (once they are appointed)</p> <p>Supporting: OPM-EES/ HRD, DIER, MHSE/MPF, VSA, AWAS, IPA, Jobsplus, MSPC/ FSWS, MHA/ Environmental Health Officers, Trade Unions, MIV/NGOs</p>	<p>YEAR 2</p> <p>On-going</p>

Strategic Goal 4.3:

Facilitate temporary residency permits

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Assess the possibility of expanding the grounds for granting temporary residence permits to victims of THB based on their personal situation in accordance with the Council of Europe Convention on Action against Trafficking in Human Beings.	Victims of THB who cannot co-operate with the authorities in the investigation/ prosecution are enabled to stay in Malta when their safety, state of health, family situation or some other factors require it.	1. Conduct an assessment of the pros and cons of granting residence permits on the basis of personal situations and on the possibility of facilitating the process for their renewal.	<p>Lead: MHSE/ Identità</p> <p>Supporting: MHSE/MPF, MJR</p>	YEAR 3

Strategic Goal 4.4:

Enhance legal assistance and free legal aid

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Ensure accessibility and build capacity within the legal aid system to support victims of THB adequately	The Legal Aid Agency ensures it has the capacity to provide free legal aid which is accessible.	<p>1. Include the provision of legal aid in the NRM.</p> <p>2. Continue to improve awareness raising activities on this right by clarifying the kind of legal assistance offered by the Legal Aid Agency, when it commences, and the extent of such legal support offered.</p> <p>3. Training to organisations offering free legal aid to potential victims of THB, including minors.</p> <p>4. Assess the possibility of expanding the existing MoU between Legal Aid/ FSWS/MPF on violence against women to address other areas of human exploitation by developing other similar agreements with other organisations.</p> <p>5. Include the data field in the NRM data collection tool, on access to legal aid. As part of this data collection, there should also be space to provide a reason on why it was not provided (if not provided).</p>	<p>Lead: MHSE, NRM Team, MJR/Legal Aid Agency</p> <p>Supporting: MSPC/FSWS, private law firms which provide pro bono services, MIV/NGOs, Chamber of Advocates</p>	<p>YEAR 2</p> <p>On-going</p> <p>YEAR 3</p> <p>YEAR 3</p> <p>YEAR 4</p>
2. Ensure adequate funding for legal assistance and free legal aid for victims of THB through the legal aid structure or any other government entities supporting victims of human trafficking.	Lawyers are made available to victims of trafficking before, during and after criminal proceedings.	<p>1. Explore avenues to increase/obtain funding internally and externally to train lawyers on THB.</p> <p>2. Provision of legal representation to victims of Human Trafficking.</p>	<p>Lead: MJR/ Legal Aid Agency, MHSE/ VSA</p> <p>Supporting: MIV/NGOs</p>	YEAR 1-2

Strategic Goal 4.5:

Guarantee effective access to compensation

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Increase the availability of training for judges and lawyers.	Increased knowledge of the importance of compensation awards to victims of trafficking through criminal and civil proceedings.	1. Include data field to the NRM database on access to compensation. 2. Plan and launch the development of a training module specifically focusing on compensation for legal professionals.	Lead: MJR/ Legal Aid Agency, National Coordinator (IMC) Supporting: MJR/, Judicial Studies Committee Chamber of Advocates	YEAR 2
2. Envisage the adoption of a procedure through which victims of THB are entitled to obtain a decision on compensation by the offender, for material (including lost earnings) and non-material damage as part of the criminal trial.	Increased knowledge by judges of possible measures to ensure that decisions on victim compensation by offenders are prioritised during the criminal proceedings rather than referring them to civil proceedings as encouraged by GRETA.	1. When reviewing the existing legislation on compensation for THB victims, evaluate whether it is necessary to amend or establish new legislation to ensure that decisions on compensations are taken during the criminal trial within a reasonable time. 2. Prepare clear and comprehensive guidelines on access to compensation which includes guidance for judges on prioritising victim compensation decisions within the criminal trial process and criteria to assess material and non-material damages.	Lead: MHSE/ VSA Supporting: OPM-EES/ National Coordinator (IMC)/CJLA WG	YEAR 1-2 YEAR 2-4
3. Build the capacity of lawyers to seek compensation on behalf of the victims, in criminal and civil proceedings and through the state fund in terms of the Criminal Injuries Compensation Scheme Regulations (S.L 9.12).	Keep data of requests for compensation.	1. Include data field to the NRM database on access to compensation. 2. Plan and launch the development of a training module specifically focusing on compensation for legal professionals.	Lead: MHSE/ VSA, MJR/Legal Aid Agency Supporting: Chamber of Advocates, MIV/NGOs	YEAR 2-4

Strategic Goal 4.6:**Improve victim and witness protection**

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Identify procedural gaps in protecting victims and witnesses in cases of THB.	Strengthened procedural safeguards for victims and witnesses.	The University of Malta/Faculty of Laws: 1. conducts an analysis of the full range of victim protection measures and of procedural gaps including with a case analysis. 2. develops a risk assessment matrix to see if victims need additional protection. 3. provides recommendations for improvement.	Lead: MHSE, OPM-EES/ National Coordinator (IMC)/CJLA WG National Rapporteur / HTMC Supporting: MJR, MEYR/ UM, MIV/NGOs	YEAR 2-3

Strategic Goal 4.7:**Provide opportunities for victims to rebuild their lives, reducing risk of re-trafficking**

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Strengthen effective access to the labour market for victims of THB and their economic and social inclusion through the provision of vocational training, language courses, mentorship and job placement.	Sustainable economic and social inclusion for victims of THB.	1. Information materials developed on rights and entitlement of victims of THB and translated in relevant languages. 2. Identify possible integration and support programmes which could improve the ways victims can access the labour market. 3. Identify ways to enable victims of THB in Malta to access legal and regulated employment through training courses and through regulating their status to make this possible. This should include specific exist programmes for victims of trafficking for the purpose of sexual exploitation.	Lead: OPM-EES/HRD, MHSE/Identita, Jobsplus Supporting: MSPC/ FSWS, CGBVDV, MIV/ NGOs	YEAR 1-2 On-going YEAR 2-3
2. Raise the awareness of the private sector and provide incentives for the creation of appropriate work opportunities for victims of trafficking.	Increased employment opportunities for victims and reduced risk of re-victimisation.	Collaborate with the private sector to: 1. Envisage developing vocational training programmes that can be offered from the reflection and recovery period. 2. Identify ways victims of THB who are Maltese can be supported through more work opportunities. 3. Identify ways to enable victims of THB in Malta to access legal and regulated employment through training courses and through regulating their status to make this possible.	Lead: OPM-EES/HRD, MHSE Supporting: MSPC/FSWS, MIV/NGOs, Chamber of Commerce, Chamber of SMEs, OPM-EES/MCESD, private sector, MEYR/MCAST	YEAR 2-4

Strategic Goal 4.8:

Improve the comprehensive, multidisciplinary and proactive approach to child trafficking

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Enhance knowledge of child trafficking.	Improved understanding and detection of child trafficking.	<p>1. Conduct research on child trafficking in Malta.</p> <p>2. Include child trafficking in the above mentioned 'situational reports' to establish trends, manifestations, and characteristics as well as specific vulnerabilities and risks.</p> <p>3. Establish a Working Group on Child Trafficking (see above) or expand the scope of work and composition of the CPN to address child trafficking and hold quarterly meetings to support the devising and implementation of the action plan with regards to child trafficking.</p> <p>4. Develop training and resources for professionals working with children (see point above).</p>	<p>Lead: MSPC/ FSWS, CPS and its CPN, Commissioner for Children</p> <p>Supporting: OPM-EES/HRD, MHSE/AWAS, MPF, MIV/ NGOs, MEYR/ UM, MCAST</p>	<p>YEAR 1-2</p> <p>On-going</p>
2. As part of the NRM, establish procedures for the identification and referral assistance of child victims of trafficking, which involve child specialists and ensure that the best interests of the child are the primary consideration in all proceedings relating to child victims of THB.	National authorities and institutions as well as NGOs working in the field of children's rights act in a coordinated manner to prevent child trafficking and provide protection and support to child victims.	<p>1. WG on Child Trafficking becomes a sub-group to the NRM Working Group mentioned above to set up formally the NRM for children.</p> <p>2. Decide whether the NRM for children should be part of the NRM system for adults. If separate, both systems connect to each other, and the needs of young people who become adults while in the system, can navigate a smooth transition between systems.</p> <p>3. Follow the steps needed to set up an adult NRM (see above) and establish the necessary MoUs with standards of care.</p>	<p>Lead: MSPC/ FSWS, CPS and its CPN, Commissioner for Children</p> <p>Supporting: OPM-EES/HRD; MHSE/AWAS, MPF; MIV/ NGOs; MEYR/ UM, MCAST</p>	<p>YEAR 1-2</p> <p>YEAR 1</p> <p>YEAR 1-2</p>
3. Carry out systematic and appropriate risk assessments of vulnerabilities of unaccompanied and separated children and ensure access to accommodation that is safe, child-friendly and with services that respond to their needs.	AWAS has more capacity to provide adequate and immediate support and protection to unaccompanied children which have access to specialised and child-friendly facilities.	<p>1. Develop a methodology to develop needs and risks assessments tools that are adapted to unaccompanied children.</p> <p>2. Develop needs and risks assessment tools with guidelines on their use.</p> <p>3. Disseminate and train relevant professionals using the Council of Europe Handbook for frontline professionals on 'How to convey child-friendly information to children in migration'.</p>	<p>Lead: MHSE/ AWAS</p> <p>Supporting: OPM-EES/ HRD, MHSE/ MPF, MIV/ NGOs, MEYR/ UM, MCAST, Commissioner for Children, MSPC/FSWS, CPS and its CPN</p>	<p>YEAR 1-2</p> <p>YEAR 2</p> <p>YEAR 2-4</p>

4. Strengthen the legal guardianship system for child victims of THB	National authorities and practitioners promptly appoint legal guardians to act in the best interests of unaccompanied children who are at particular risk of being trafficked or are being trafficked and take measures to continue to reinforce the system of guardianship in light of Recommendation CM/Rec (2019)11 on Effective guardianship for unaccompanied and separated children in the context of migration .	1. Carry out an assessment of the level of implementation of the CM/Rec (2019) as required by the Recommendation itself, to identify existing gaps and seek improvement measures.	Lead: MSPC/FSWS, CPS and its CPN, SCSA/Central Authority	YEAR 2
		2. WG on Child Trafficking uses this analysis to initiate measures to overcome existing barriers to the immediate appointment of legal guardians.	Supporting: OPM-EES/HRD, MHSE/AWAS, MPF MSPC/Commissioner for Children, MIV/NGOs, MEYR/UM	YEAR 3
		3. Training needs assessment to improve the guardianship system for child victims of THB according to international standards.		YEAR 4
5. Improve the system for age assessments using the Council of Europe standards and tools in this area.	National authorities and practitioners implement international standards when assessing the age of a potential victim of THB whose age is uncertain.	1. Develop and share tools on the basis of the Council of Europe Recommendation CM/Rec(2022)22 of the Committee of Ministers to member States on human rights principles and guidelines on age assessment in the context of migration.	Lead: OPM-EES/HRD, MHSE/AWAS, MPF, MSPC/FSWS, CPS and its CPN, Commissioner for Children	YEAR 2
		2. Establish a monitoring and evaluation mechanism through the WG on Child Trafficking.	Supporting: MIV/NGOs, MEYR/UM	YEAR 2
		3. Conduct continuous training on the Council of Europe standards for age assessments including on ethical considerations and cultural sensitivity.		On-going
6. Increase the understanding of children victims of THB of their rights with the help of interpreters who are sensitised to human trafficking and cultural mediators who are trained on children's rights, child safeguarding measures and on child trafficking.	National authorities ensure that child-friendly information is provided promptly to child victims of trafficking, who are foreign nationals, on their rights in a language they can understand, taking into account their maturity, intellectual and emotional capacity, literacy, and any mental, physical, or other disability which may affect the ability to understand.	1. Train cultural mediators and interpreters on children's rights and child trafficking.	Lead: OPM-EES/HRD, MHSE/AWAS, MSPC/FSWS, CPS	YEAR 1-2
		2. Map and train civil society organisations working with child victims.		On-going
		3. Develop child-friendly materials on children's rights and child trafficking adapted to the needs of different groups.	Supporting: MHSE/MPF, Commissioner for Children, MIV/NGOs, MEYR/UM	Year 2-4

STRATEGIC AREA 5:

STRATEGIC PARTNERSHIPS AT REGIONAL AND INTERNATIONAL LEVELS TO TACKLE HUMAN TRAFFICKING

Strategic Goal 5.1:

Strengthen strategic partnerships at regional and international levels

Specific objective	Expected Result	Concrete action	Responsible institutions/ partners	Target Date
1. Strengthen bilateral agreements with neighbouring countries, key source, and destination countries for THB to exchange information, promote exchanges of experience and dialogue, and support measures in specific geographical contexts.	National authorities organise and improve the exchange of information, and the sharing of intelligence, best practices and resources with the victims' country of origin, and of transit and/or exploitation.	<p>1. Conduct a Strategic Threat Assessment with the support of Europol to identify where trafficking threats to Malta exist and if there are sufficient Mutual Legal Assistance Treaties or bilateral agreements.</p> <p>2. Identify opportunities to develop training programs for law enforcement, border control, and other relevant officials from both Malta and partner countries to enhance their capacity in identifying and combatting human trafficking.</p> <p>3. International agreements are used further to organise joint work/action.</p>	<p>Lead: MFET</p> <p>Supporting: MHSE/MPF, OPM-EES/HRD/National Coordinator (IMC), CJLA WG (IMC), MFIN/FIAU</p>	<p>YEAR 1-2</p> <p>YEAR 3-4</p> <p>On-going</p>
2. Make full use of all relevant EU agencies (Europol, Eurojust, Ceuol, European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (eu-LISA), EU Judicial Cooperation Unit (Eurojust), European Border and Coast Guard Agency (Frontex), European Labour Authority to enhance capacity of operational actors, systematically exchange data to facilitate investigations in transnational cases of THB.	<p>National authorities activate existing partnerships and their resources to prevent human trafficking, protect victims, investigate cases, and prosecute perpetrators including in the context of organised crime.</p> <p>The MPF and the AGO, when there is willingness from other jurisdictions, launch joint investigation teams to disrupt organised crimes groups (OCGs) in the field of THB.</p>	<p>1. Conduct a mapping on the different roles of EU agencies to identify possible partnerships to exchange information, lead joint research and projects and find operational support and identify the relevant governmental agencies which should pursue this work.</p> <p>2. Operational support from EU agencies is used accordingly.</p> <p>3. Identify opportunities for JIJs and prepare a roadmap.</p>	<p>Lead: MHSE/MPF, MJR/AGO, any other competent Authority</p> <p>Supporting: MFIN/FIAU</p>	<p>YEAR 1-4</p> <p>On-going</p> <p>On-going</p>


<p>3. Continue to strengthen and use multi-lateral diplomacy instruments to promote a human rights-based approach to combat human trafficking (CoE, OSCE, EC, ICMPD, UNODC) and improve legal standards, build capacities and exchange of good practices, and find support in developing policies and tools.</p>	<p>The Maltese authorities use multi-lateral instruments to further develop and strengthen international standards, ensure that all sectors benefit from capacity building opportunities and strengthen the comprehensive multi-agency response to THB.</p>	<p>1. Continue to participate actively in international activities and provide feedback to all relevant entities which could not be present.</p> <p>2. Systematically share information received from international organisations with relevant entities in Malta, eventually through the national coordination body (IMC) with regular briefings or training sessions to ensure effective dissemination and utilisation of international insights.</p> <p>3. Contribute to the development and strengthening of international standards related to combatting human trafficking eventually in technical working groups.</p>	<p>Lead: MFET</p> <p>Supporting: MHSE/MPF, MJR/AGO, MFIN/FIAU, OPM-EES/ National Coordinator (IMC)/CJLA WG</p>	<p>YEAR 1-4</p> <p>On-going</p> <p>On-going</p>
<p>4. Improve the referral, return and assistance of foreign victims of trafficking through the development of a Transnational Referral Mechanism (TRM) with formalised standard operating procedures for cross-border THB cases.</p>	<p>National authorities improve their assistance to victims of THB at all stages (identification, first assistance and protection, long term assistance and social inclusion, criminal and civil proceedings), and ensure the safe and voluntary return of victims of trafficking to countries of origin.</p>	<p>1. Identify countries of origin of victims of human trafficking.</p> <p>2. National coordinator (IMC) makes contact with national coordinators of identified countries of origin.</p> <p>3. Once the NRM is in place and operational, identify opportunities to join/establish a regional TRM (South Med project) including in light of the developments at the EU level on the EU NRM.</p>	<p>Lead: OPM-EES/HRD, National Coordinator (IMC), National Rapporteur (HTMC)</p> <p>Supporting: MHSE/MPF, MSPC/FSWS, NRM team</p>	<p>YEAR 1-2</p> <p>YEAR 2</p> <p>YEAR 3-4</p>

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