

Submission to the European Commission

February, 27th 2015

**in response to the Template for National Rapporteurs or Equivalent Mechanisms and
in contribution to the upcoming report according Art.20 of Directive 2011/36/EU**

by

**the Irish Civil Society Organisations (CSO) in the EU Anti-trafficking Platform:
Doras Luimní, Immigrant Council of Ireland and Ruhama**

The Department of Justice and Equality in Ireland assumes the functions of the National Rapporteur or Equivalent Mechanism (NREM). We, the undersigned, hope that these arrangements are temporary and that the State will soon follow the best practice examples in the European Union.

The undersigned organisations strongly recommend the appointment of an independent National Rapporteur in Ireland. The lack of such an independent structure has been the subject of criticism by Civil Society Organisations (CSO herein) in press releases and submissions to the Irish Government focusing on this particular topic¹.

The preferred option for the Irish national context is an independent body with the power to request information and the competence to analyse trends accountable directly to the Irish Parliament. A good example in this regard is the Irish National Rapporteur on Child Protection and his annual reports to the Parliament².

This submission follows the structure of the formal template but provides an independent separate response to the questions originally put to the NREM in Ireland. As such the submission is structured under the following headings:

1. Assessments of trends in trafficking in human beings.
2. Measuring of results of anti-trafficking actions.
 - 2.1 Criminal Law, Investigation and Prosecution.
 - 2.2 Assistance and support (including protection).
 - 2.3 Prevention:
 - Information and awareness raising campaigns, including to curb demand
 - Training and education programmes
 - Legislative measures on prevention and to discourage demand
3. Gathering of statistics in close cooperation with relevant civil society organisations active in this field.

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Ruhama: <http://www.ruhama.ie/>

Immigrant Council of Ireland: <http://www.immigrantcouncil.ie/>

¹ <http://www.immigrantcouncil.ie/images/PDFS/Rappa.pdf>

² http://www.dcy.gov.ie/viewdoc.asp?fn=/documents/Child_Welfare_Protection/SpecialRapporteurChildProtection.htm

1. Assessments of trends in trafficking in human beings.

Measure	Assessment of THB Trends
Timeframe of Assessment Period	
<p>Objectives</p> <p>I. Present and Future-Oriented assessment</p> <p>II. Analyse the different trends of THB (<u>such as</u> on victims and traffickers disaggregated by gender, age and citizenship, various forms of exploitation, new and emerging trends, modus operandi, Organised Crime Groups, national and transnational THB, involvement of legal persons, recruitment of victims, means used, profile trafficker/facilitator, higher risk sectors, estimates of profit and money flows, demand)</p> <p>III. Inform actors working in the field of THB (public and private authorities, civil society organisations, researchers and others) in order to take adequate policy measures.</p>	<p>Response from Irish CSO</p> <p>The present Irish NREM at the Department of Justice provides a present and retrospective analysis of trends in trafficking in human beings (THB). However, the data compiled and presented in the NREM annual report is published with a significant delay after the assessment period. As a result, finding up-to-date information on THB trends or figures in Ireland remains problematic.</p> <p>As indicated by the official NREM report, formal projections of future trends have not yet been included in the NREM report for Ireland, while information is gathered in cooperation with CSOs with considerable expertise. There is scant information in the NREM report on traffickers. The NREM reports do not include sufficient analysis of current and emerging trends, modus operandi of traffickers, organised crime groups, involvement of legal persons, estimates of profit and money flows, or information on higher risk sectors.</p> <p>On the basis of the data available, some trends are easily distinguishable, albeit unacknowledged. These is for instance the prevalence of trafficking for the purposes of sexual exploitation and the disproportionate representation of women in the victim’s statistics. There is also a worrying trend of child trafficking for suspected purposes linked to sexual exploitation, which is a reoccurring trend in the data gathered in Ireland. The undersigned CSOs submit that regardless of the difficulties experienced in data collection, it is safe to conclude based on the knowledge available in Ireland that women and children are the primary target group of the traffickers and that trafficking for sexual exploitation is by far the most prevalent form.</p> <p>While data gathered by the Irish NREM is used to monitor trends and provide an evidence base, it is arguable that with such minimal disaggregated data THB trends cannot be sufficiently understood in all their aspects, and therefore nuanced preventative measures cannot be informed.</p>

<p>Details of assessment – please specify and elaborate in each case</p> <p>I. Methodology</p> <p>II. Inclusion of statistics</p> <p>III. Who carried out the assessment and which organisations and/or stakeholders have been involved?</p> <p>List sources that have been used <u>such as</u> analytical reports of law enforcement services, reports by CSOs, EU agencies, academic studies, international organisations etc?</p>	<p>Response from Irish CSOs</p> <p>The THB figures collated by the NREM for the year 2013 and 2014 have yet to be made available to the general public.</p> <p>Information collection process</p> <p>The CSOs welcome and support the efforts of the AHTU to collate statistics. The three organisations³ making the present submission fill in and submit information in the required format and then engage in further efforts to eliminate any duplications.</p> <p>The Irish NREM cites figures from 2009-2013, which in a collated manner illustrates the main stats at a glance:</p> <p>Types of human trafficking Sex trafficking: 202 (69%) Labour trafficking: 64 (22%) Uncategorised exploitation: 21 (7%) Sex and labour trafficking: 3 (1%) Other: 3 (1%)</p> <p>Gender Female 230 (79%) Male 63 (22%)</p> <p>Age Adults 205 (70%) Children 88 (30%)</p> <p>Regions Various but West Africa and EU are the main source regions.</p>
<p>Dissemination and Use of the Results – please provide details such as publication on website, distribution to parliament for discussion, distribution to stakeholders etc.</p>	<p>Response from Irish CSOs</p> <p>While the annual reports are very welcome, the information is not made available in a timely manner. Presently, the latest published report is for year 2012. Given that centralised information on THB trends in Ireland is not available from alternative sources, these reports are especially important.</p>

³ Please note that the Immigrant Council of Ireland was not included in the original report but the Department of Justice have undertaken to amend it.

2. Measuring of results of anti-trafficking actions

2.1. Criminal Law, Investigation, and Prosecution

Measuring the result of	Financial investigations
Timeframe of the assessment period	
<p>Objectives:</p> <ul style="list-style-type: none"> I. Evaluate the use of financial investigations in THB cases as a tool to detect money flows, as well as enabling the freezing, seizure and confiscation of proceeds of crime II. Develop better gathering of evidence in THB cases with a view to increasing prosecutions and convictions and dismantling Organised Crime Groups (OCGs) III. Improve knowledge on crime patterns in THB cases <p>Expose gaps in anti-money laundering compliance and uncover liability of a financial institution or other professionals</p>	<p>“No formal overall assessment of THB investigations involving financial investigations have been conducted” <i>(official NREM template)</i></p> <p>Response from Irish CSO</p> <p>The lack of investigations and assessment of the financial side of THB in Ireland is of concern - as is the lack of transparency in criminal investigations into human trafficking in general.</p> <p>We recommend regular updates for victims in ongoing cases of the progress of the case or respectively its closure.</p> <p>We recommend that investigations into THB should not be overly reliant on victims’ testimonies.</p>
<p>Organisations and/or Stakeholders involved – please list and explain how they were involved</p> <p>Experts could include those in the fields of trafficking in human beings, financial crime, cybercrime, organised crime, prosecutors, judges where appropriate, private sector (banking, ICT)</p>	
Details of assessment – please specify and elaborate in each	

<p>case These could include the methodology, number of cases evaluated, experts involved etc</p>	
<p>Relevant reports—please provide an exhaustive list</p>	
<p>Output</p> <p>I. Evaluation report on financial investigation in THB cases that includes the mentioning of the number of THB cases evaluated, meetings organised between experts, the model used, number of staff trained (also by CEPOL)</p> <p>II. Conclusions based on the evaluation of the increase of prosecutions (and eventually convictions) because of the use of financial investigations, the number of OCGs dismantled, the information sent to Europol, cooperation with Eurojust</p> <p>Have recommendations been formulated because of the evaluation?</p>	<p>“Internal An Garda Síochána operational assessments of 2 THB investigations resulting in confiscation orders being imposed were conducted” (<i>official NREM template</i>)</p> <p>Response from Irish CSOs We note that the formal report mentions two confiscation orders involving THB cases. These instances are very important.</p> <p>We note with concern that the only available easy-to-access compensation mechanism in Ireland is the Criminal Justice Compensation Tribunal that refunds verifiable expenses, which is not applicable to victims of trafficking in the majority of cases.</p> <p>We recommend the establishment of a fund and a clear procedure that would ensure that part or all of the confiscated assets are used for the compensation of victims of trafficking, in the absence of any other avenues for compensation in Ireland.</p> <p>We recommend the creation of easy to access compensation avenues for victims of trafficking.</p>
<p>Outcome (short and medium term)</p> <p>I. Has financial investigation in THB cases resulted in an increased number of traffickers prosecuted?</p> <p>II. Has it lead to a better detection and dismantling of THB OCGs?</p> <p>III. Has it resulted in an increase of the freezing, seizing and confiscation of proceeds of crime?</p> <p>Has it lead to better collection of</p>	<p>“Operation Abbey – confiscation order for €2 million. OCG primary and 2 accomplices convicted in UK and confiscation order made based on evidence provided by An Garda Síochána. Operation Mast - OCG dismantled, brothel keeping conviction, assets confiscation order made” (<i>official NREM template</i>)</p> <p>Response from Irish CSOs</p> <p>There is a lack of transparency in operations or outcomes of THB detections and prosecutions, and victims of trafficking are rarely updated on their cases.</p>

<p>evidence and in the process lift the burden for victims to testify?</p>	
<p>Impact (long term)</p> <p>I. Has the detection and prosecution of THB cases increased?</p> <p>II. Has the number of convictions increased and have more OCGs been dismantled?</p> <p>Has compensation to victims increased and has THB been better prevented?</p>	<p>“No formal assessment of impacts carried out” <i>(official NREM template)</i></p> <p>THB Related Convictions</p> <p>2010 – 5 2011 – 4 2012 – 6 2013 – 9</p> <p>Response from Irish CSOs</p> <p>Despite the positive trend, we note the low level of convictions for THB and we acknowledge that this is a problem across the EU. The adversarial criminal justice system as well as a lack of understanding of the Non-Punishment principle (Pursuant to Article 26 of the Convention) often sees victim of trafficking prosecuted and even detained.</p> <p>We also note with concern the lack of avenues for compensation for victims of THB as stated above.</p>
<p>Who provided funding for the evaluation, who carried out the evaluation?</p>	<p>“No formal assessment carried out” <i>(official NREM template)</i></p> <p>Response from Irish CSOs</p> <p>The lack of formal evaluations with an independent monitoring body is a concern. For this reason, the CSO in Ireland call for the appointment of an independent Rapporteur on the issues of human trafficking, which would reporting directly to the Parliament, following the good precedent already existing in the area of Child protection.</p>

2.2. Assistance and Support (Including Protection)

Measuring the result of	National referral mechanisms or other coordination mechanisms
Timeframe of the assessment period	2011
<p>Objectives:</p> <ul style="list-style-type: none"> I. Evaluation of the implementation of the mechanism II. Expose gaps and short comings in the mechanisms and changes in patterns on identification, assistance and protection to victims of THB, including children III. Develop or improve the mechanisms in terms of reacting to emerging trends of THB, including new actors, including transnational elements 	<p>“A review of the National Action Plan to Prevent and Combat Trafficking of Human Beings in Ireland 2009-2012 (NAP) was conducted to examine the implementation of the NAP and outlines the measures that have been undertaken in Ireland to prevent human trafficking, support victims and prosecute those responsible for this crime” (<i>official NREM template</i>)</p> <p>Response from Irish CSOs</p> <p>The Irish CSO, including the present submission makers has published a range of reports on the issues of protection and assistance to victims of human trafficking. In addition, the Irish CSO made a joint submission to the Council of Europe (GRETA) in 2012. Many of the issues highlighted in the submission were reflected in GRETA’s country report on Ireland⁴.</p> <p>The CSO analysis and the concerns remain valid to date, as no changes have been implemented in Ireland. These outstanding areas cover:</p> <ul style="list-style-type: none"> 1) Identification of all detected victims regardless of their nationality and legal status, and with formalised input from the CSO specialist organisations. 2) Access to national referral mechanism outside of Dublin area⁵. 3) Ending the practice of excluding victims in the asylum process from the possibility to be identified acknowledged and supported as victims of the crime of trafficking⁶. 4) Providing gender-sensitive assistance to victims, in view of the prevalence of trafficking for sexual exploitation and the female

⁴ <http://www.immigrantcouncil.ie/index.php/research-publications/publications/771-greta-shadow-report-analysis>

⁵ <http://dorasluimni.org/wp-content/uploads/2015/02/No-Chances-No-Choices-Soft-Copy.pdf>

⁶ <http://www.immigrantcouncil.ie/index.php/research-publications/publications/523-asylum-seeking-victims-of-human-trafficking-in-ireland>

	<p>victim profile. Ending the policy of using the asylum accommodation centres for vulnerable female victims.</p> <p>5) Issuing acknowledgement to all identified victims of trafficking, and ensuring access to services equally to non-EU and EU victims of trafficking, through the provision of a Temporary Residence Permit and the exemption of EU citizens from the Habitual Residence Condition. This should not be limited to cases where the victim cooperates in an investigation but also for cases where the personal circumstances of the victims so require.</p> <p>6) Introducing viable avenues for compensations for victims of trafficking, outside of the criminal compensation tribunal, which is unsuitable for most victims, and outside of court orders which have never been made.</p> <p>7) The principle of non-prosecution for victims of trafficking must be adhered to. The guidelines issued to the office of the Director of Public Prosecution (DPP), are insufficient in practice, due to problems with the current identification procedure, as well as a lack of awareness among judiciary and legal practitioners.</p> <p>8) With regard to the efforts in upholding the rights of victims of trafficking, there is a leading EC ISEC funded project in the EU (led by the Immigrant Council of Ireland) that promotes early legal intervention for victims of trafficking, in which Doras Luimní, Ruhama and other leading CSOs and State agencies are included in advisory capacity⁷.</p> <p>We await the publication of the next draft National Action Plan and we are looking forward to participating in the consultations.</p> <p>We anticipate greater input into the victim identification process.</p>
<p>Details of assessment – please specify and elaborate:</p> <p>I. Methodology</p> <p>II. Inclusion of statistics</p>	<p>Response from Irish CSOs</p> <p>We appreciate that the review of the NAP in Ireland in 2012 included feedback from CSOs, international organisations and civil society actors.</p> <p>However, the delay in publication of any new national action plan since</p>

⁷ <http://www.earlylegalintervention.eu/>

<p>III. Who carried out the assessment, what budget was available and which organisations and/or stakeholders have been involved?</p> <p>IV. List sources that have been used <u>such as</u> analytical reports of law enforcement services, reports by CSOs, EU agencies, academic studies, international organisations, etc?</p>	<p>2012 is worrying. In the absence of a new national strategy, the working group consultative meetings, which used to provide an important space for sharing of information and debate on policy and legislation, have also unfortunately discontinued.</p>
<p>Output:</p> <p>I. Evaluation report on the implementation Persons trained.</p>	
<p>Outcome</p> <p>Questions:</p> <p>I. Has the mechanism raised awareness and increased the use by the targeted actors?</p> <p>II. Has it increased the number of victims identified and victims?</p> <p>III. Have victims received better assistance, support and protection to victims?</p> <p>IV. Have more contacts been established with actors in country of origin of victims</p> <p>Were victims better reintegrated?</p>	<p>“No formal evaluation was conducted in regard to the referenced outcomes” <i>(official NREM template)</i></p> <p>Response from Irish CSOs</p> <p>Re I. The mechanism has created greater awareness of THB in Ireland, particularly around media outlets and the general public.</p> <p>Re II. Unfortunately, the increased awareness in Ireland has not translated into an increased number of identified victims of trafficking. We attribute this fact to the serious policy shortcomings in relation to victim identification in Ireland, namely the exclusion of victims in the asylum process as well as EU and Irish nationals from a process of formal identification. We attribute this to the failure to utilise the expertise of the specialist CSO by including them in the identification procedure in a formalised manner.</p> <p>Re III. Services for THB have not improved as the majority of detected victims remain un-identified and consequently do not receive the full range of protections. The number of identified victims has decreased per year in the reporting period.</p> <p>Statistics from 2013 and 2014 have yet to be made available.</p>
<p>Impact</p> <p>Questions :</p> <p>I. Has there been a decrease of</p>	<p>“There has been a year on year decrease in regard to the number of victims of human trafficking however it is not possible on the basis of the current data to state why this is the case” <i>(official NREM template)</i></p> <p>Response from Irish CSOs</p>

<p>victims of THB?</p> <p>II. Were victims of THB less damaged?</p> <p>III. Was quality of assistance and support to victims of THB better?</p>	<p>Re I. We would like to express our reservations in relation to the question of increase or decrease of victims of human trafficking in Ireland. Instead, we note that what could be claimed for sure is the fact that annually, there are only several identification procedures carried out and respectively very few R&R permits granted. Yet there are tens of detected victims featuring on the annual statistical reports who have not been formally identified, while many of them participate in continuous criminal investigations of the crime committed against them. In addition, we would like to raise a point of comparison with Northern Ireland that has half the population of the Republic, but reports similar number of detected victims in 2012.</p> <p>Re II. We are concerned about the process of re-victimisation of victims of trafficking stemming from the necessity to repeat traumatic accounts and also the pressure on victims to appear as a primary source of intelligence in trafficking investigations. In that regard, we would repeat our call for more pro-active investigations that are not heavily reliant on victims' testimonies.</p> <p>Re II. Identification of victims of human trafficking does not involve input from CSOs. There are also issues around detecting certain types of exploitation. Trafficking for forced marriage for example is not recorded and is not legislated for.</p> <p>An upcoming EC ISEC funded project involving the Immigrant Council of Ireland and the Department of Justice and Equality, led by the Latvian Ministry of Interior is expected to provide clarity in the area of 'sham' marriages in the context of human trafficking.</p> <p>Trafficking for criminal activity, particularly in cannabis production⁸ and heroin distribution, is not recognised by the courts or judiciary despite the recent amendment to the Criminal Law (Human Trafficking) Act 2008 that expands the definition of the trafficking crime in Ireland.</p> <p>There is insufficient understanding of the Non-Punishment principle (Article 26 of the Convention) among legal practitioners in Ireland. Trafficking for forced labour insufficiently detected, and relies on the work of CSOs.</p>
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⁸ <http://www.mrci.ie/wp-content/uploads/2014/03/Full-Report-Trafficking-for-Forced-Labour-in-Cannabis-Production-1.pdf>

2.3 Prevention

Measuring the result of	Information and awareness raising campaigns, including to curb demand
Timeframe of the assessment period	
Objectives: <p>I. Evaluation of campaigns</p> <p>II. Better knowledge and effectiveness of campaigns and identify gaps and shortcomings in the campaigns, in reaching out to the target groups, and in the tools used such as social networks through the internet</p> <p>Improved campaign materials and better use of the available tools such as the internet</p>	Response from Irish CSOs <p>There has been a wide range of awareness work carried out in Ireland, some of it sponsored by the Irish Government.</p> <p>The Department of Justice (AHTU) in partnership with Ruhama are currently (2014-15) delivering an EU PROGRESS funded awareness initiative (The REACH Project). There will be several initiatives, with a first strand targeting the most vulnerable in Ireland in the commercial sex trade, who may be victims of THB. A second strand of this project will target men and boys by highlighting the issue of demand as a key contributor to exploitation through the purchase of sex. A third will support awareness raising among professionals who may encounter potential victims of sex trafficking. This project is also in partnership with The Northern Ireland Ministry for Justice as well as the police and key health and Civil Society organisations.</p> <p>The Irish CSO have been particularly active in the field of prevention through awareness and through addressing of demand that fosters human trafficking. Examples of such efforts on the part of the CSO are:</p> <ul style="list-style-type: none"> • The photo exhibition “Not Natasha” in 2011, organised by the Immigrant Council and sponsored partially by the Department of Justice & Equality and Dublin City Council; • Screening of the documentary “The price of Sex” in various venues around Ireland, which was hosted by Immigrant Council, Doras Luimní and many other regional specialist organisations. • Running a national campaign Turn off The Red Light, aimed at the discouragement of demand that fosters the environment of sex trafficking (most prevalent form of trafficking in Ireland). https://www.facebook.com/turnofftheredlight?fref=ts • The poster campaign “Anna Was 14” alerting the public about child trafficking and the young age of people entering prostitution, which was ran by the TORL sponsored by the Community Foundation of Ireland • Research on demand that fosters human trafficking “Stop Traffick”: Under the EC ISEC programme, the Immigrant Council of Ireland led a transnational research based initiative that explored the issue of demand from ‘users of services’ perspective

	and issued practical and widely-applicable recommendations for efficient demand reduction strategies ⁹ .
<p>Details of assessment – please elaborate</p> <p>I. Methodology</p> <p>II. Inclusion of statistics</p> <p>III. Who carried out the assessment, what budget was available and which organisations and/or stakeholders have been involved?</p> <p>IV. List sources that have been used such as analytical reports of law enforcement services, reports by CSOs, EU agencies, academic studies, international organisations etc?</p>	<p>“No formal evaluations have been undertaken” (<i>official NREM template</i>)</p> <p>Response from Irish CSOs</p> <p>Some of the CSO initiatives have been evaluated, which is often a condition for accounting to the funders sponsoring the campaign. For example the EC ISEC project “Stop Traffick” has been evaluated and the recommendations of the project welcomed by the European Commissioner for Home Affairs, the EU Anti-trafficking Coordinator as well as EU and national level politicians¹⁰.</p>
<p>Output:</p> <p>I. Evaluation report</p> <p>II. Persons trained</p> <p>III. Persons reached by campaigns.</p>	<p>“No formal evaluations have been undertaken” (<i>official NREM template</i>)</p> <p>Response from Irish CSOs</p> <p>Due to the fact that no evaluation has been undertaken of the awareness and prevention efforts overall, it would be difficult to assess, their effectiveness.</p> <p>It is hoped that the eventual appointment of an Independent National Rapporteur, in line with the CSO recommendations, would be in a position to provide assessments on the effectiveness of the various initiatives.</p>
<p>Outcome</p> <p>Questions:</p> <p>I. Have the campaigns lead to an increase in the knowledge and awareness of THB of the</p>	<p>“No formal evaluations have been undertaken” (<i>official NREM template</i>)</p> <p>Response from Irish CSOs</p> <p>As per the above, due to a lack of an evaluation it is difficult to assess if the campaigns have been successful in reaching the targeted group.</p>

⁹ <http://www.stoptraffick.ie/>

¹⁰ <http://www.stoptraffick.ie/wp-content/uploads/2013/03/Stop-Traffick-Independent-Evaluation-by-Dr-Jane-Pillinger.pdf>

<p>targeted group?</p> <p>II. How have the campaigns been used by the targeted group?</p> <p>III. Did the targeted group identify more victims?</p> <p>IV. Were victims better referred and assisted?</p> <p>V. Have campaigns prevented THB?</p>	<p>Some campaigns will be delivered in the near future which will contain an evaluation component.</p>
<p>Impact:</p> <p>Questions:</p> <p>I. Has the number of victims of THB decreased?</p> <p>II. Was THB prevented?</p>	<p>“No formal evaluations have been undertaken” (<i>official NREM template</i>)</p> <p>Response from Irish CSOs</p> <p>While detections of THB has decreased it is difficult to ascertain if this is due to awareness raising campaigns. There are on-going issues with the victim identification process.</p>
<p>Dissemination and Use of the Results – Please provide details</p>	<p>None provided</p>

<p>Measuring the result of</p>	<p>Training and education programmes</p>
<p>Timeframe of the assessment period</p>	<p>On-going</p>
<p>Objectives</p> <p>Such as</p> <p>I. Evaluation of the training and education programmes on THB</p> <p>II. Increased knowledge on the effectiveness of these programmes and identification of gaps and shortcomings</p> <p>Improved programmes and materials as well as better use of the available tools such as the internet</p>	<p>Response from Irish CSOs</p> <p>The NREM reports that An Garda Síochána conduct training in conjunction with international organisations and civil society organisations. Feedback forms at the training sessions act as a monitoring mechanism to evaluate the training.</p> <p>A particularly welcome approach adopted by the State authorities is the regular training of police officers from around the country with input from non-governmental organisations. In recent past, the Train-the-Trainer initiative had a wide reach among civil servants and practitioners who could encounter victims of trafficking.</p>
<p>Details of the assessment – please elaborate in each case</p> <p>I. Methodology</p> <p>II. Inclusion of statistics</p> <p>III. Who carried out the assessment, what budget was available and</p>	

<p>which organisations and/or stakeholders have been involved?</p> <p>List sources that have been used <u>such as</u> analytical reports of law enforcement services, reports by CSOs, EU agencies, academic studies, international organisations, etc?</p>	
<p>Output</p> <p>Such as</p> <ul style="list-style-type: none"> I. Evaluation reports II. Persons trained <p>Others</p>	<p>“IOM conducted an evaluation of Garda training. Over 800 police officers have received this training” (<i>official NREM template</i>)</p> <p>Response from Irish CSOs</p> <p>Feedback from training sessions by CSOs were made available but not of the overall evaluation of the entire training.</p>
<p>Outcome</p> <p>Questions :</p> <ul style="list-style-type: none"> I. Has the knowledge and awareness of THB of the targeted group increased? II. To what extent is the targeted group using the acquired knowledge? III. Have more victims been identified by the targeted group? IV. Were victims better referred and assisted? V. Has the communication on the rights of victims improved? <p>Have victims been better protected?</p>	<p>“Improvements to implementation of training course. Initially training consisted of a series of presentations from a range of different stakeholders (law enforcement, government bodies and civil society) however following a review of the feedback and input from course organisers a more interactive approach was adapted which also included panel discussions and more time for questions and debate. Feedback regarding the course has been very positive indicating that participants felt the course delivered on its objectives. Outcomes in terms of victim identification have not been assessed” (<i>official NREM template</i>)</p> <p>Response from Irish CSOs</p> <p>It is difficult to assess whether the knowledge and awareness of THB has been effective with the target group – detections of THB have decreased in the last few years. Additionally, Ruhama conducts more in-depth training with Gardaí on the issue of prostitution.</p>
<p>Impact:</p> <p>Questions:</p> <ul style="list-style-type: none"> I. Have the number of victims of THB decreased? 	<p>“The number of victims detected by/reported to An Garda Síochána has been decreasing in recent years however it is not possible to say with any certainty whether this is related to training” (<i>official NREM template</i>)</p> <p>Response from Irish CSOs</p>

Was THB prevented?	The victim identification process is problematic, particularly among certain forms of THB, such as trafficking for criminal activity (cannabis cultivation, heroin distribution) ¹¹ and for forced labour.
Dissemination and Use of the Results – Please provide details	“Results are not publically available”.

Measuring the result of	Legislative measures on prevention and to discourage demand
Timeframe of the assessment period	
Objectives: <ul style="list-style-type: none"> I. Evaluation of the legislative measures on prevention and to discourage demand II. Expose gaps and short comings Identify best practices and develop and/or improve legislative measures to better prevent THB	Response from Irish CSOs <p>We acknowledge that an analysis of the effectiveness of the Human Trafficking Act in criminalising forced labour was conducted, which was welcome and which subsequently led to an amendment to the definition in 2013 to include a definition of ‘forced labour’.</p> <p>However; an evaluation of the effectiveness of the legal measures to discourage demand for the most widely spread form of exploitation, sex trafficking, has not been carried out.</p> <p>In this regard the absence of any convictions obtained under Art 5 of the Criminal Law (Human Trafficking) Act 2008, specifically aimed at users of services of trafficking victims has not been acknowledged and analysed. Nonetheless, the futility of the provision to penalise users who knowingly purchase services from victims of trafficking is an established fact today. In light of this, the CSOs welcome the Government Approval in November 2014 of the inclusion for unconditional penalties to users in the sex industry, as part of the new Criminal Law Sexual Offences Bill, while the CSOs are mindful that these developments occurred after the completion of the official NREM report by the State and therefore were not included there.</p>
Details of assessment – please specify and elaborate in each case <ul style="list-style-type: none"> I. Methodology II. Inclusion of statistics III. Who carried out the assessment, 	Response from Irish CSOs <p>No formal evaluations of the 2008 or the 2013 acts are available.</p>

¹¹ <http://www.thejournal.ie/imprisoning-slavery-victims-1389053-Mar2014/>

<p>what budget was available and which organisations and/or stakeholders have been involved?</p> <p>List sources that have been used <u>such as</u> analytical reports of law enforcement services, reports by CSOs, EU agencies, academic studies, international organisations, etc?</p>	
<p>Output</p> <p>Evaluation reports</p>	<p>“Neither the Criminal Law (Human Trafficking) Act, 2008 nor the Criminal Law (Human Trafficking) (Amendment) Act, 2013 have been subject to formal evaluation as a whole” <i>(official NREM template)</i></p> <p>Response from Irish CSOs</p> <p>This is would be an area of concern for Irish CSOs.</p>
<p>Outcome</p> <p>Questions:</p> <p>I. How have the legislative measures led to the prevention of THB in all forms of THB?</p> <p>II. Have new measures been introduced and were they implemented correctly?</p> <p>Have relevant actors been informed and trained on the new measures?</p>	<p>“A Report of the examination of the effectiveness of the Criminal Law (Human Trafficking) Act, 2008 Act in criminalising forced labour was published on the web site www.blueblindfold.gov.ie” <i>(official NREM template)</i></p> <p>Response from Irish CSOs</p> <p>An evaluation led to the definition of forced labour being included in the 2013 human trafficking amendment act.</p>
<p>Impact:</p> <p>Questions:</p> <p>I. Has THB decreased?</p> <p>Have all forms of THB been prevented?</p>	<p>Response from Irish CSOs</p> <p>No formal evaluation of either the 2008 and 2013 pieces of legislation.</p>
<p>Dissemination and Use of the Results – Please provide details</p>	<p>There has been no formal evaluation, hence no dissemination of the results.</p>

3. Gathering of statistics in close cooperation with relevant civil society organisations active in this field.

We acknowledge that a designated anonymised template for statistical purposes has been developed, which the CSOs complete and submit. We also understand the efforts made by AHTU to eliminate any instances of duplication. These are welcome efforts and could represent the foundation for a very broad and valuable data collection process in Ireland.

At the same time, we remain focused on the areas that require improvement as previously outlined in this submission.



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