
DIGNITY

Executive Summary of the Formative Evaluation
of an Interagency Initiative working to deliver
quality services for Victims of Sex-Trafficking in Ireland.

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01 Trafficking in Ireland and the origins of the Dignity project

The Dignity Project (2009-2010) was funded under the EU Daphne programme to develop a model of interagency working to deliver best practice approaches to addressing trafficking of women for sexual exploitation in Ireland. It was established by Dublin Employment Pact and the Immigrant Council of Ireland in response to the increasing incidence of trafficking for sexual exploitation in Ireland and an identified need to improve the coordination and integration of services for victims of trafficking¹.

02 Aims and objectives of the Dignity project

Aims of the Dignity project:

- To contribute to efforts to combat trafficking for sexual exploitation;
- To raise awareness and understanding of the problem among EU member states and to improve services to victims of trafficking for sexual exploitation.

Objectives of the Dignity project:

- To examine models of effective inter-agency practice in service provision to victims of trafficking for sexual exploitation;
- Identify and disseminate good practice between partners, in order to mainstream models of inter-agency work with both statutory agencies and NGOs;
- To support improved delivery of good practice services for victims and vulnerable groups (women in prostitution), thereby contributing to improved efforts in combating trafficking in women and children for sexual exploitation across the EU.

03 Overview of the formative evaluation

Two evaluators were appointed to carry out the formative evaluation of the Dignity project. This was carried out through an evaluation of partner roles, project activities and transnational visits and overall project outcomes.

¹ See Ward E and G Wylie. (2007) *"The Nature and Extent of Trafficking of Women into Ireland for the Purpose of Sexual Exploitation: 2000-2006: A Report from Findings"*. SSRC Research Papers and Reports, No 39. SSRC NUI Galway; and Kelleher Associates, O'Connor M and Pillinger J (2009) *"[Globalisation, Sex Trafficking and Prostitution: The Experiences of Migrant Women in Ireland]"*, Immigrant Council of Ireland: Dublin.

The objective was to highlight best practice approaches and the how the learning from the project could be mainstreamed.

An interim report was produced at the end of Year 1, which provided a framework for the development of the Dignity project in the second year².

04 The Irish policy framework and response to trafficking for exploitation

The adoption of the UN Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons especially Women and Children, and the Council of Europe (CoE) Convention on Action Against Trafficking in Human Beings, has led a comprehensive State response to trafficking.

In 2008 an Anti-Human Trafficking Unit was established in the Department of Justice and Law Reform. The National Action Plan to Prevent and Combat Trafficking of Human Beings in Ireland 2009-2012 sets out the measures that the government is putting in place for victims who are trafficked for both sexual and labour exploitation. The Plan covers prevention, protection of victims, prosecution of traffickers and child trafficking, and by the end of 2010 two-thirds of the 144 actions has been implemented or significantly progressed. The Plan has led to the creation of a specialist Counter Human Trafficking Unit of An Garda Síochána, under the Garda National Immigration Bureau (GNIB), a dedicated Anti-Trafficking Team in the Health Services Executive (HSE) and a dedicated team in the Legal Aid Board. A High Level Group and six Working Groups, one of which is on trafficking for sexual exploitation, have also been established. The Plan has led to a process for referral and service provision for Victims of Trafficking (VoT). Referrals to these services take place after a VoT is referred to the GNIB. There is no integration of these provisions to allow for a response to and service provision for women in prostitution, many of whom are migrant women or who are VoT. While the Garda Síochána has established a separate Organised Crime Unit with a specific remit on organised prostitution, the legislative and policy remit of trafficking rests within the policy framework on immigration, within the GNIB.

One of the issues raised in the Dignity project was the growing national and international evidence of the link between trafficking and organised criminal prostitution networks. Another

² *The Interim Dignity evaluation report can be found on [http://www.dublinpact.ie/dignity/PDF/DIGNITY %20 EVALREPORT%20March%202010.doc](http://www.dublinpact.ie/dignity/PDF/DIGNITY%20EVALREPORT%20March%202010.doc)*

core issues is that the focus on trafficking as an immigration policy issue results in gaps in provision for women who are internally trafficked for prostitution or in providing services for women who are EU citizens.

Currently services for VoT, including legal assistance, health, counselling and accommodation services are conditional on a VoT reporting a case to the GNIB. It is only then that they can avail of the services and supports.

The first report issued by the AHTU Summary Report of Trafficking in Human Beings in Ireland for 2009, reported that 66 potential and suspected VoT came to the attention of the GNIB, 49 of whom were adults and 17 were minors. Of these cases just over 80% were under investigation. In 10 of the 66 cases a 60-day Recovery and Reflection (R&R) permit had been granted, and of these 6 were VoT for sexual exploitation. Forty of the 66 potential or suspected VoT were in the asylum process during this time.

Between November 2009 and December 2010, 39 cases of potential or suspected VoT were referred by the GNIB to the dedicated team in the Legal Aid Board for legal assistance³. In 2010, 36 referrals were made, of whom 24 were VoT for sexual exploitation.

Up to December 2010, 56 referrals were made HSE dedicated Anti-Trafficking Team for support and assistance, including care plans⁴.

05 The Dignity partners

All partners brought different and valuable organisational roles, capacities and expertise to the inter-agency partnership established in Dublin. The following statutory agencies and NGOs made up the Dignity Dublin interagency partnership:

- Dublin Employment Pact
- Immigrant Council of Ireland
- Garda National Immigration Bureau (Counter Human Trafficking Unit - CHTU) (in an observer capacity in Year 1)

3 *Written Answer to Parliamentary Question issued by Lucinda Creighton, No 585, Minister for Justice and Law Reform, 12 January 2011*

4 *Ibid*

- Anti-Human Trafficking Unit (Department of Justice and Law Reform) (in an observer capacity)
- Women's Health Project (HSE) (Year 1 and 2), Anti-Trafficking Unit (HSE) (Year 2)
- Sonas Housing Association
- Ruhama (joined at the end of Year 1)
- Legal Aid Board (joined at the end of Year 1)

In addition, the project had three transnational partners which included:

- Glasgow Community & Safety Services (Glasgow City Council, linked to the TARA project, Scotland)
- Klaipeda Social and Psychological Services Centre (NGO, linked to a municipal inter-agency partnership, based in Klaipeda, Lithuania)
- AE Madrid City Council and APRAMP (City Council and NGO, Madrid, Spain)

Transnational study visits and seminars took place with each of the partner projects in Year 1, including a Dublin transnational seminar. In Year 2 an additional study visit was organised to Sweden to examine the outcomes of the legislation on demand for prostitution for its applicability in an Irish and other partner context.

More detailed information about the Dignity project and the profiles of the partners can be found in the full evaluation report: <http://www.dublinpact.ie/dignity>

Overview of the organisation and management of the Dignity project

A Project Coordinator was appointed to oversee and manage the project, and act as an independent Chair of the Dignity project groups, and was assisted through administrative support part funded by the Dublin Employment Pact. The project was managed through the following groups:

- A Dignity Steering Group (Immigrant Council of Ireland, Dublin Employment Pact and the Project Coordinator).
- A transnational Steering Group (three transnational partners, the Dignity Coordinator, the Immigrant Council of Ireland and Dublin Employment Pact).
- In 2010, following a successful application for funding to FAS, a pre-training pilot project was established with an Advisory Group (Dublin Employment Pact, Ruhama, FAS, Department of Social Protection and the Dignity Coordinator) and a Steering Group (Ruhama, Dublin Employment Pact and the Dignity Coordinator).

06 Summary of project activities

The Dignity project ran for two years 2009 and 2010.

Year 1 focussed on two specific objectives:

- The development of an inter-agency partnership;
- The establishment of a Dignity model of practice for service provision, informed by learning and good practice from transnational study visits, research and models established elsewhere.

Year 2 focussed on four main areas:

- Consolidating and extending the Dignity partnership and through this the learning between transnational partners;
- Acquiring funding for the development and piloting of a pre-training project for victims of trafficking for sexual exploitation, funded by the national training agency FAS;
- Developing greater understanding of the role and impact that legislation on demand could have in an Irish context;
- To disseminate the learning from Dignity to a wider network of agencies and service providers in Ireland.

All of the actions identified in the original Dignity plan were implemented in full. The main actions can be summarised as follows:

Dublin Dignity Inter-agency partnership

- The Dublin Dignity inter-agency partnership brought together statutory organisations (AHTU, GNIB in the Year 1, Legal Aid Board and the HSE) and NGOs (Immigrant Council of Ireland, Dublin Employment Pact, Sonas Housing Association and Ruhama). Thirteen inter-agency meetings were held in Dublin during the project (seven in 2009 and six in 2010).

Steering Committee meetings

- Regular Project Steering Committee meetings were held in Dublin and five transnational Steering Group meetings were held with the transnational partners.

Transnational study visits, seminars and bi-lateral staff exchanges

- In 2009, four transnational study visits, which included a two-day seminar and visits to

service providers, took place to examine models of service provision visits in Scotland, Lithuania and Spain. A Dublin transnational seminar provided an opportunity to share models of practice and disseminate the findings to a wider group of statutory agencies and NGOs.

- In 2010, a study visit to Sweden examined the outcomes of the Swedish legislation to criminalise the buying of sex. All of the Dignity partners participated in the transnational study visits and seminars.
- In 2010, four Dublin-based Dignity partners were involved in bi-lateral staff exchanges with their counterparts in other countries.

Conferences and seminars

- The two-day transnational seminars that were held in Scotland, Lithuania, Spain, Dublin and Sweden provided an exchange of information from a wide network of national statutory agencies and NGOs engaged in providing services to VoT. This provided models of good practice and examples of inter-agency cooperation.
- In Dublin the dissemination of information and good practice models took place through four conferences: a conference to launch the project held in Dublin on 16 June 2009, the 'Dignity and Demand' conference held in Dublin on 5th November 2009, a conference hosted by the Lord Mayor of Dublin on 25 May 2010, and the final Dignity conference held in Dublin on 7 February 2010. Good media coverage was given to these events, which contributed to the visibility and awareness of the project nationally.
- Regular information dissemination of the Dignity project took place through presentations to and meetings with national and international agencies, papers presented to international conferences, and a final briefing for European organisations, NGOs and MEPs in Brussels in February 2010.

Communications and information activities

- A Dignity project website, information leaflets translated into the languages of the project's transnational partners and regular briefing documents enabled there to be a regular flow of information of the Dignity project's activities. This information was also disseminated to a wider network of agencies in Ireland and through the transnational partner countries.

08 Key outcomes of the Dignity project

The five main outcomes of the Dignity project were:

- An inter-agency partnership involving statutory representatives and NGOs, that took a wide remit to examining the context, policy framework and service delivery responses to trafficking for sexual exploitation;
- Sharing of learning and best practice models of legislative and service delivery models and in the light of international obligations, to inform the development of services in Ireland, and the wider EU partners;
- An open forum for discussing the wider context of and models of service responses to both prostitution and trafficking for sexual exploitation through research, transnational study visits and seminars, thereby contributing to the fight against trafficking EU-wide;
- An opportunity for partners to learn about their roles and remits, and thereby facilitate and inform referral mechanisms and service responses and thus contributing to the fight against trafficking.
- Generation of media debate and discussion. Considerable media debate was generated through various Dignity project events in Ireland, creating awareness of the issues. More notable media reactions were obtained on the occasion of the formal launch of the initiative in Dublin, the transnational conference Dignity & Demand at the end of Year 1, and more recently at the Graduation ceremony of trainees of the additional Dignity-FAS-Ruhama pilot training, Significant media debate was created as a result of the Dignity partner trip to Sweden, that prompted parliamentary questions and broader media debate on possible reform of the relevant legislation that affects demand for services of trafficked people.

a) Dublin Dignity inter-agency partnership

The inter-agency partnership formed an integral part of the project and a new form of intervention based on inter-agency working. This was a significant achievement. The process of partnership working led to the sharing of experiences, learning of partner organisational

roles and functions, and through this the development of a Dignity inter-agency model of practice. This outcome led to significant relationship building and shared understanding between the agencies represented on the partnership and an appreciation of the constraints experienced by some partners, as well as the opportunities for providing a more integrated range of support services to victims of trafficking. The inter-agency meetings were also an opportunity to review and evaluate the learning from the transnational visits, to discuss in an open way issues related to referral, victim identification, support services and learning from best practices.

One of the key objectives of the Dignity partnership was to develop a draft Memorandum of Understanding and a model of service provision that can enhance the quality and the access to integrated services that are appropriate to the needs of victims of trafficking. This was a significant element of the work of the Dignity project and led to concrete outcomes and a formalisation of the roles of partners under the AHTU.

In Year 1 the Dublin partners discussed and drafted a Memorandum of Understanding, which informed the first National Statement of Roles and Responsibilities adopted under the coordination of the AHTU in Year 2. Also during the first year, an inter-agency model of service provision was proposed by the Dignity partners. In Year 2 this was further developed under the map of provision established by the AHTU, to which all Dublin partners provided recommendations. The Dignity inter-agency group realised that it was important for the AHTU to take the lead in developing the map, rather than finding themselves in a situation where there were two separate maps; one from the Dignity group and one from the AHTU.

b) Transnational study visits, seminars and bilateral exchanges

The five transnational study visits organised in Scotland, Lithuania, Spain, Ireland and Sweden were attended by all Dublin partners and transnational partners. Separate reports and an evaluation of each transnational study visit were carried out.

Scottish transnational study visit, 11-12 May 2009

The visit focussed on the legislative context in UK, the Glasgow Community & Social Services Project, established by the Local Authority and Police services in Glasgow (in partnership with the Domestic Abuse Advocacy Service and TARA project). Key learning was gained about their Inter-agency model of working, the cooperation and relationship between

the police, the relationship between the police, local authority and NGOs, the provision of support services (including legal services and accommodation) and the development of protocols for victim identification and risk assessment.

Lithuania study visit, 24-25 August 2009

The study visit examined the legislative context in Lithuania, the Lithuanian model of service provision; the inter-agency partnership of statutory and non-statutory organisations established by the Klaipeda municipality; the legal, criminal and prosecution services; and the Klaipeda Social and Psychological Support Project. Key learning included the breath and coordination roles of the municipality led inter-agency group, the model of social and psychological support services, and the approach in a country with a different profile of trafficking.

Spanish study visit, 8-9 October 2009

The study visit examined the legislative context in Spain, the specific programme of 'routes out of trafficking' established in Madrid by AE Madrid City Council and APRAMP. As well as learning about the legal, criminal and service framework for VoT, the key learning included the role of APRAMP in providing outreach and support services for VoT, the work in partnership with the municipal employment agency to develop training and employment opportunities for women in prostitution and VoT, and the role played in coordinating support services and inter-agency work.

Irish transnational study visit, 3-4 November 2009

The Irish transnational seminar provided an opportunity for national and transnational partners to learn about Irish legislation and service provision on trafficking, and to engage in bi-lateral discussions on victim identification and policing, legal services and the role of housing, outreach and support services. A public conference held the day after the transnational seminar, entitled 'Dignity and Demand', provided a forum for an open discussion about trafficking in Ireland, the role of the Dignity project, and the role played by legislation tackling demand for sexual services, with particular reference to Sweden. The conference also provided an opportunity to disseminate the work of the Dignity partnership in Ireland to a wider network of statutory and non-statutory agencies across and also to begin a discussion about the role of legislation in controlling the demand for prostitution, as exemplified by the Swedish model.

Swedish transnational study visit, August 2010

The final transnational study visit took place in Sweden in response to an interest from partner organisations to find out more about implementation and impact of the Swedish legislation to criminalise the purchasing of sex and control demand. The backdrop to this was the Swedish government's high-level Inquiry in 2009⁵, which concluded that the legislation had contributed to the reduction in demand for prostitution and trafficking, and a high level of public support for the approach taken.

Bi-lateral staff exchanges

In 2010 staff from the Immigrant Council of Ireland, the Anti-Trafficking Unit of the Legal Aid Board, the Anti-Trafficking Team in the HSE and Sonas Housing Association participated in staff exchanges to their counterparts in Glasgow and London. The staff exchanges enabled the Dublin partners to engage in more detailed discussions about service provision and to learn from the models developed. This was found to be particularly valuable learning for service provision in Ireland. The NGOs and statutory agency staff found the learning from close cooperation with statutory agencies in processes of identification, legal assistance and specialist accommodation for VoT, to be very valuable.

c) **Dignity/Ruhama pre-training pilot project**

The Dignity project secured funding from the FAS Social Inclusion Unit in 2009 to provide a pre-training support programme to victims of trafficking and women exploited in prostitution. The delivery of training to this vulnerable group supports the Irish State obligation's under the CoE Convention on Action against Trafficking in Human Beings and the UN Palermo Protocol on Trafficking in Persons, which both contain provisions on the delivery of support and training to victims of trafficking. The Irish National Action Plan also includes measures to assist the reintegration of suspected victims into the labour market.

The Dignity project contracted Ruhama, which has over twenty years experience responding to the needs of women in prostitution and trafficked women, to develop and deliver the programme. In recognition of the trauma experienced by VoT a specialised model was developed to provide wrap around support pre-training and introductory training experiences in 'soft' skill development and some FETAC accredited basic skills training, in order to prepare participants to be ready to access mainstream and community services in training, education and employment.

⁵ Government of Sweden (2010) *"The Ban against the Purchase of Sexual Services. An Evaluation 1999-2008"* (English Translation)

Twenty-eight women participated over the year long programme receiving an average number of 241 hours made up of individual tuition, class hours and individual support. The women were overwhelmingly positive about their engagement in the programme. They consistently spoke about having a sense trust again and that for the first time they can imagine a hopeful future. They felt the programme had been highly successful in identifying their needs and delivering appropriate training and support. The key issues they highlighted in interviews and focus groups were the importance of one to one support that Ruhama provided in building trusting relationships which they recognised as critical for surviving the trauma and breakdown of trust they had experienced and participation in group work with women who had similar experience of exploitation, beginning to make friends and breaking isolation. Assertiveness, including Personal Development programme such as the Steps programme were seen to be vital to building confidence, self esteem and communication skills, while practical classes such as English and computers increased capacity for further training and education. Finally, the career path planning has already enabled many women to access further education and employment.

d) Policy outcomes

One of the objectives of the Dignity project has been to influence policy, particularly in the development of appropriate services and protection for victims of trafficking in line with international best practice. In particular, the Project opened up a space to discuss issues of demand as part of an overall strategy to eliminate trafficking for sexual exploitation in Ireland. This was important in the development of the State's framework on trafficking as set out in the Anti-Human Trafficking Action Plan National Action Plan to Prevent and Combat Trafficking in Human Beings in Ireland, 2009-2012 (Department of Justice and Law Reform, 2009).

The Dignity project was instrumental in informing a Private Member's Motion from the Fine Gael Party that was before the Dáil in November 2009, which called for a debate on trafficking for sexual exploitation and the sex industry in Ireland, and the provision of appropriate accommodation and support services for victims. In Year 2, following the transnational visit to Sweden to examine the Swedish legislation on demand, a report on the visit was submitted by the AHTU to the Minister of Justice, and Law Reform Mr. Dermot Ahern T.D. In a response to a Parliamentary Question in the Dáil, Mr Ahern confirmed that "I have asked the Attorney General to examine the report and requested his views on the legal and constitutional implications of introducing such a ban here".

During this time the Immigrant Council of Ireland had been instrumental in establishing and leading a national campaign on demand, to which the Dignity Project was associated, supporting legislative action based on the Swedish model⁶. This provided valuable learning for the Dignity Project partners, which also looked at similar campaigns to address demand in Scotland and England.

09 Conclusions

- The Dignity project has met all aims and objectives set and the methods of working and structures that have worked well. This is particularly evident for the NGOs participating in the project, while statutory partners found the learning of best practice models and of partner roles to be particularly valuable. The inter-agency group was seen by all partners to have provided a good opportunity to share information, learning and approaches, as well as contribute to the emerging model of service provision.
- All partners were of the view that the Dignity project had either strengthened or reinforced their own organisation's role and activities on anti-trafficking. Relationship building, information sharing and better coordination between partners was crucial to the building of a model of service provision. For the NGOs the formalisation of these relationships through the Memorandum of Understanding (MOU) among the Irish partners has been an important step forward to building a lasting inter-agency partnership.
- The cooperation that has been achieved has enabled services to be coordinated more effectively. The formal and informal relationship building has been crucial to ensuring that there are systems of referral and contact between the partners. Overall, all partners saw this as a real added-value to their work.
- The Dignity/Ruhama pre-training pilot project was an important achievement for the project, particularly as there is now a model in place that can be mainstreamed.

⁶ 'Turn off the Red Light' see <http://www.immigrantcouncil.ie/campaigns/combating-trafficking-and-exploitation-in-the-sex-industry/tackling-demand-for-paid-sex>.

Good practice models and transferability of learning

The following are examples of good practices have been identified from the Dignity project's transnational study visits, seminars and activities have provided important learning for the services for Irish and transnational partners:

- Common systems for reporting, for example, in carrying out risk assessments and psychological reports.
- The application of the assessment procedure and National Referral Mechanism developed in Glasgow could have valuable lessons for Ireland and other countries, and particular in promoting NGO and police cooperation.
- Models of inter-agency cooperation and systems for victim identification and referral, found in Scotland, Lithuania, Spain and Sweden, that enable coordination between agencies in providing integrated services to both women and prostitution and VoT. For example, the model of social and psychological support services provided by the Klaipeda Social and Psychological Services Centre, showed how an NGO can take a lead role in integrating services for women and prostitution and VoT. The TARA project in Glasgow showed a good practice model for integrating services for women in prostitution and VoT in the NGO sector, with good cooperation between police and statutory authorities in victim identification and support.
- The learning from the Spanish 'routes out of prostitution' training project showed how outreach, risk assessments and safety planning, and coordination between training and other support services can be provided. This was particularly useful in informing the development of the Dignity/Ruhama pre-training pilot project.
- In Madrid and Glasgow the provision of emergency accommodation / shelters specifically for victims of trafficking was seen to work very well, particularly as these models placed VoT in housing with social supports. Linking into specialist accommodation in the domestic violence sector was welcomed by NGOs in Ireland as a possible model that could be replicated.
- The Swedish approach demonstrated the effectiveness of legislation criminalising the purchasing of sex in tackling prostitution and trafficking, which has been important to

reducing the demand for trafficking overall. There is learning from this approach and from success of the awareness raising campaign carried out in Sweden.

10 Recommendations

a) Continue Interagency Cooperation

- There is wide support for the continuation of an inter-agency partnership approach as a basis for ongoing learning and the continued development of best practice models. The interagency approach should be mainstreamed and extended on a national basis.
- The Map of service provision drawn up by the AHTU indicates the complexity of multi-agency involvement in trafficking cases. It is critical that there are structures of coordination and cooperation in place to support front line responders who will be navigating the mechanisms and referral processes with VOT. There is a real potential to develop an inter-agency case management approach amongst the service providers.
- This should incorporate continuous training for statutory and non-statutory agencies as provided for under the CoE Convention, and a programme for the dissemination of the learning and good practices established under the Dignity Project.
- Funding will need to be sourced for an independent Chair and administrative support for continued inter-agency cooperation, and to develop new ways in which this could take place, for example, regular discussion forums, roundtables or seminars.

b) Improved processes for identification and protection of VOT

- There is a need to further develop and enhance the identification process, establish a clear timeframe and boost transparency in the decision-making process. This requires clarity of procedures in the issuing of R&R and Temporary Residence Permits (TRP), and

to put in place alternative acknowledgements for identified victims who are not granted R&R/TRP due to the fact that they hold another type of permit, or do not have a pending application for asylum or 'humanitarian leave' in the State.

- Clarity is needed in relation to disclosure of reasons not to afford VOT status to potential VOT. An independent review mechanism should be put in place for women who are not formally identified as VOT but believe they are a victim of this crime in Ireland.
- NGOs have a key role to play in the identification process, as seen in the model established by the Dignity partner in Scotland, and as exists in other countries. The CoE Convention, the OSCE guidebook and the TIP indicators established by the US Secretary of State, all state that NGOs should play a continuous role in both the identification process and in providing support for VOT.

c) Legal Rights

- There is an urgent need for all potential VOT to have access to immediate and early legal advice. The provision of such advice should not be made dependent on cooperation or contacts with the GNIB. Full legal representation must be offered to suspected VOT cooperating with the authorities in the investigation and/or prosecution of trafficking offences; this should also include the provision of legal assistance in relation to applications of non-prosecution and compensation. .
- The legal protection of VOT offered in Ireland has to be brought in line with the CoE Convention in relation to the granting of R&R permits, which must be granted without prejudice to any asylum application made by the person concerned. Currently, the linking of the above processes results in different levels of assistance, and could potentially disadvantage those VOT who have also sought asylum in the State,
- Longer term solutions are needed for VOT who have cooperated in criminal investigations and/or prosecutions, or who are too vulnerable, traumatised or endangered to be returned home; this should include the introduction of special humanitarian permits.
- VOT should have the legal right to a Temporary Residence Permit on the basis of humanitarian needs as provided for in the CoU Convention. Currently, VOT will first

receive a notification of intention to deport before they can make an application for permission to remain on humanitarian grounds.

d) Enhance the role of service provision and front-line responders

- Specialised accommodation should be available for all potential VOT as RIA is not always appropriate or safe for VOT. International best practice and learning from the transnational partners is that specialist violence against women service providers have a key role to play in providing safe accommodation, with safety planning, risk assessment and care planning built into the support provided. VOT should be able to access specialist accommodation, irrespective of their legal status.
- There should be a further development and continuation of education and training programmes, and progression routes for VOT and women exiting prostitution, such as those developed in the Dignity/Ruhama pilot project. Again access and progression to mainstream education and training programmes should not be conditional on legal status. It is recommended that partnership be established with service providers outside of Dublin to replicate and mainstream the pilot programme.
- The Dignity project and international evidence has highlighted links between prostitution and trafficking. Therefore it is recommended that a review of the needs of all women in prostitution accessing the WHP and Ruhama should be carried out in order to identify needs in relation to access to legal advice, care planning, access to health, counselling, exit routes, long term support services, and accommodation.

e) Continue to inform policy developments

- There is a need for systematic collection of data and the documentation of cases studies in order to complement the valuable data collected by the AHTU. This will help with the monitoring of the implementation of the mechanisms, decisions and short and long term outcomes of VOT.
- There is a need to continue to develop and monitor the MOU and protocols, in order to develop and progress effective interagency working and best practice service provision.

- It is recommended that the services currently provided for VoT be extended to include women who have been exploited in prostitution, as international best practice demonstrates the need to integrate policy measures in relation in prostitution and VOT.
- An integrated national policy framework and legislation should be introduced for tackling demand for prostitution, given the clear evidence of how effective the Swedish approach has been, legislation in line with the Swedish approach should be introduced and there should be a national education and awareness campaign on reducing the demand for prostitution, especially given its link to trafficking for sexual exploitation.

f) Monitoring and Accountability

- An independent National Rapporteur should be appointed with statutory powers to request information from the police, the immigration authorities, social services and NGOs and to report to the Minister for Justice and the Irish Parliament, as required under the CoE Convention.
- An anti-trafficking and prostitution monitoring group, made up of NGOs and human rights agencies should also be established along the lines of the UK Anti-Trafficking Monitoring Group, to inform and support the work of the Rapporteur.
- Under the 2011 review being carried out by the AHTU all legislation and administrative procedures in place need to be examined to see if they are 'fit for purpose' in relation to the rights of VOT. This would assist in the preparation for the CoE monitoring provision mechanism established under the Group of Experts on Action Against Trafficking in Human Beings (GRETA), due to visit Ireland in 2012.

