An Roinn Dlí agus Cirt,
Gnóthaí Baile agus Imirce
Department of Justice,
Home Affairs and Migration

Strategy to combat Economic Crime and Corruption

gov.ie

Contents

Foreword from Minister

Economic crime and corruption pose a serious and evolving threat to our society, undermining public trust, distorting markets and weakening confidence in our institutions. As Ireland continues to develop as a globally connected and open economy, it is essential that we remain steadfast in protecting the integrity, transparency and fairness that underpin our society.

This National Economic Crime and Corruption Strategy represents a significant step forward in strengthening Ireland's capacity to prevent, detect, investigate and prosecute economic crime and corruption. It has been developed by the Advisory Council against Economic Crime and Corruption, an independent, non-statutory body established by Government in 2022 following a key recommendation of the Hamilton Review. The Advisory Council, independently chaired by James Hamilton, brings together senior representatives from across Government, law enforcement, regulatory bodies, academia, civil society and the business and financial sectors to provide strategic and policy advice to Government through the Minister for Justice, Home Affairs and Migration.

I wish to acknowledge the significant work undertaken by the Advisory Council in developing this Strategy. It reflects extensive deliberation and engagement, including consultation with key stakeholders, a public call for submissions and a dedicated stakeholder forum. This collaborative process has ensured that the Strategy is both ambitious and grounded in practical experience.

At its core, the Strategy sets out a clear and structured framework built around five strategic objectives: strengthening data capture and threat assessment; enhancing information exchange and public-private partnership; improving enforcement and prosecution capabilities; expanding tools for asset recovery and confiscation; and advancing prevention through education and awareness. These objectives will be supported by a detailed, multi-annual action plan to drive delivery and accountability.

Central to this Strategy is a whole-of-government and whole-of-society approach. Economic crime and corruption are complex, adaptive and often transnational in nature. An effective response requires coordinated action across Government departments, enforcement agencies, regulators, the private sector and civil society. We are committed to ensuring that this Strategy is implemented on a cross-departmental basis, with strong leadership and sustained co-operation.

By strengthening our collective response, we will safeguard public trust, protect the integrity of our economy and reinforce Ireland's standing as a trusted international partner. This Strategy sets a clear direction and we are resolute in our commitment to delivering on its ambition.

Jim O'Callaghan TD
Minister for Justice, Home Affairs and Migration

Foreword from Chair

The Advisory Council against Economic Crime and Corruption was established in 2022 as an independent, advisory, non-statutory body. Its principal responsibility is to provide strategic and policy advice, proposals and recommendations relating to economic crime and corruption to the Government through the Minister for Justice, Home Affairs and Migration.

The Advisory Council consists of a chairperson and nineteen "senior persons drawn from relevant Government Departments, State regulators and law enforcement agencies, along with a number of representatives from industry, academia and civil society with an expertise in anti-corruption activities."

I would like to thank all those who have served on the Council since its inception for their hard work and the spirit of co-operation which has marked the work of the Council. I also wish to give particular thanks to the members of the Secretariat who have provided the Council and me personally with an outstanding service, all while still managing to do the day job with numerous other responsibilities.

As Chair of the Council I have the honour to present this Strategy to the Government through the Minister. The Strategy is based on five interlocking strategic objectives which the Council believes should inform Ireland's approach to fighting economic crime and corruption.

The level of economic crime and corruption is notoriously difficult to measure. We know about the cases where crime and corruption is discovered and thwarted but it is more difficult to measure those cases where corruption succeeds. Although Ireland is perceived as a country with low rates of

corruption, constant vigilance is required to ensure that the reality continues to live up to this perception. Both modern states and major institutions in civil society make numerous decisions which affect the lives and fortunes of our citizens and it is to be expected that there will always be those who seek to use unlawful means to secure an unmerited advantage. The increasingly globalised nature both of economic activity and of criminal organisations is a further complicating factor.

We now embark on the process of giving effect to the Strategy through the creation and implementation of a detailed action plan. This will require consultations with a wider group of actors than are at present represented on the Council.

James Hamilton

Executive Summary

The Advisory Council against Economic Crime and Corruption ("the Advisory Council") was established by Government in 2022 with a mandate to provide strategic and policy advice, proposals and recommendations relating to economic crime and corruption to the Government. One of its principal tasks is to draft a national multi-annual strategy for combatting economic crime and corruption ("the Strategy"), together with an accompanying action plan.

Vision

The overall vision driving this Strategy is a whole of society approach to tackle economic crime and corruption, safeguard our society and economy, and uphold the highest standards of integrity.

This Strategy aims to strengthen the mechanisms in place in Ireland in the fight against economic crime and corruption. Given the changing nature of economic crime – the ever-increasing levels of global, transnational fraud in particular – and the necessity to be hyper-vigilant of corruption risks, this Strategy aims to achieve a coherent, collaborative, whole-of-society approach to tackling economic crime and corruption.

Strategic objectives

The Strategy is built on five interlocking strategic objectives which together will constitute a whole of society approach to fighting economic crime and corruption. These objectives are detailed in the chapters below and include:

1. Improve the collection, analysis and use of data to enable policymakers to develop evidence-informed policies to fight economic crime and corruption,
2. Develop a cross-sectoral approach to combat economic crime and corruption including through improved co-operation and information sharing,
3. Ensure we have the specialisation and tools we need for the effective investigation and prosecution of economic crime and corruption,
4. Significantly improve our ability to seize and confiscate criminal assets, and
5. Develop a coordinated approach to prevention through education, better communication and increased compliance.

Consultation and key findings

Given the extraordinary breadth and complexity of the economic crime and corruption landscape, the first phase of development leveraged the expertise of the Advisory Council's membership from across the public sector, business and the financial sector, academia and civil society, with a view to establishing the scope and focus of the Advisory Council's work. This was further informed by engagement with key stakeholders and relevant European and international organisations and counterparts.

A detailed consultation process then took place in order to inform the Strategy's development. At the core of this work was the understanding of the deeply corrosive and impactful effects of economic crime and corruption both to society as a whole, and to individual members of the public. Engagement included an online survey to gauge the public's priorities when tackling such a broad and multi-faceted threat, an open call for written submissions, an in-person stakeholder event, together with bilateral engagement with key stakeholders and relevant European and international organisations and counterparts.

Engagement with the public, industry and other stakeholders (Annex 2) indicated broad agreement with the overarching objectives of this Strategy.

The collection and collation of data, the sharing of information, and the dissemination of information, knowledge and awareness to the public were key themes across each of the consultation stages. Fragmented actions, limited information sharing and a lack of cross-sectoral and cross-functional understanding are the oxygen feeding criminal enterprise. And whilst many submissions acknowledged that there is a lot of important work being pursued across Government, the private sector, and civil society, there was broad consensus on the necessity to break down entrenched silos to foster a truly collaborative environment on a cross-sectoral basis.

The significant threat posed by an increasingly digitalised, online society and advancements in technology, data and artificial intelligence were regularly cited, but so too were the opportunities of these developments to all those committed to tackling economic crime and corruption, including law enforcement, regulators, the private sector and civil society.

Another key finding was the importance of the 'follow the money approach' in prevention, disruption and enforcement of economic crime and corruption offending. These are principally profit driven enterprises and as such, the aggressive pursuit of the proceeds of crime and criminal assets is a vital tool in the broader fight to counter these threats. Stripping criminals of their assets derived from criminal conduct weakens their ability to operate and acts as a strong disincentive from further criminal activity. Whilst Ireland has boasted a pioneering legislative and institutional framework for pursuing domestic criminal assets for close to 25 years now, future success is dependent on the ability to facilitate investigators to identify, trace and seize illicit assets on a transnational basis.

Conclusion

The objectives and recommendations set out in this Strategy are the required measures to deliver on the overall vision. Given the relentlessly evolving nature of economic crime and corruption, particularly having regard to the rapidly changing technological landscape, there is a necessity to build in flexibility to our collective response. As the criminal threat presented by digitalisation and technology evolves to new levels of sophistication, so too must the response. Consequently, this Strategy is designed as a dynamic framework, the implementation of which will require agility and flexibility to enable a potential reprioritisation of our response in order to meet shifting environmental challenges and opportunities.

The Strategy places a strong focus on coherence and alignment, ensuring that national priorities are advanced in tandem with the broader European legislative framework. By emphasising a whole-of-society approach, collaboration, the reduction of duplication and supplementing existing efforts, the Strategy fosters greater impact through collective effort. Central to this approach is the cultivation of cross-sectoral collaboration and partnerships enabling the sharing of knowledge, resources and innovation. These measures aim to position the Strategy to deliver meaningful progress in the fight against economic crime and corruption, while complementing and reinforcing ongoing national strategies, policies, and initiatives.

Recommendations

Strategic Objective 1

Improve the collection, analysis and use of data to enable policymakers to develop evidence-informed policies to fight economic crime and corruption

- Develop a unified approach to the collection, collation and analysis of data relating to incidences of economic crime and corruption to support the identification of strategic priorities.
- Consider how AI could potentially assist with the development of data collection systems and processes for economic crime and corruption.
- Conduct sectoral risk assessments to identify the key economic crime threats that we face in Ireland.
- Introduce specific legislation to enable the CCPC to access and analyse public procurement data in the State to detect and deter bid-rigging in public procurement.

Strategic Objective 2

Develop a cross-sectoral approach to combat economic crime and corruption including through improved co-operation and information sharing

- Pursue a public-private partnership approach to better prevent, detect and pursue economic crime. This should include fintech, online service providers and telecommunications companies as well as the financial sector.
- Review and identify challenges with private-to-private information sharing and consider the necessity of introducing legislation where necessary.
- Develop legislation for a shared fraud database to enhance information and data sharing on a private-to-private basis.
- Enhance corruption policy coordination and knowledge sharing across government, civil society and academia.

Strategic Objective 3

Ensure we have the specialisation and tools we need for the effective investigation and prosecution of economic crime and corruption

- Carry out a study in relation to increasing efficiencies in the investigation and prosecution of economic crime and corruption cases to include a review of the feasibility of non-trial resolution measures such as deferred prosecution agreements.
- Review Ireland's corporate liability framework.
- Consider developing legislation to give effect to an SMS scam filter.
- Ireland should take part, where appropriate, in all EU measures that have an impact on the detection, investigation and prosecution of economic crime and corruption.
- Enhance international judicial and police-to-police co-operation in criminal matters with strategic non-EU countries.
- Carry out a study on the benefits and effectiveness of artificial intelligence (AI) in combatting economic crime and corruption.

Strategic Objective 4

Significantly improve our ability to seize and confiscate criminal assets

- Ratify the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds of Crime.
- Opt-in to the EU's Asset Recovery and Confiscation Directive.
- Participate to the greatest extent possible in international operational initiatives, such as Interpol's Silver Notice and Europol's Project A.S.S.E.T, to bolster operational capabilities and further improve Ireland's asset recovery outcomes.
- Review the Criminal Justice Act 1994 with respect to post-conviction based confiscation.

Strategic Objective 5

Develop a coordinated approach to prevention through education, better communication and increased compliance.

- Consider if campaigns could be coordinated as part of an overall national communications and education strategy in relation to frauds and scams.
- Develop coordinated high-level economic crime and anti-corruption information campaigns.

Chapter 1 Overview

Ireland is a stable and secure place in which to do business and is an attractive place to live and work. Our open society and economy contribute greatly to our prosperity. Whilst an open society brings benefits, it is not without risk. Criminals, organised crime groups and hostile states seek to exploit this openness to move their illicit finances. This damages our economy and undermines the rule of law and the integrity of our institutions. We must ensure a continued robust approach in countering this threat and that we have what we need to do so.

Economic crime and corruption are inextricably linked. Serious and organised crime is often the driver behind fraud, corruption and illicit financing, though not exclusively. These criminal activities, which range from fraud and bribery to money laundering and sanctions evasion cause financial loss to individuals, businesses and the public sector and can undermine trust in our institutions. It does not stop here – economic crime and corruption facilitates further organised crime creating a sustained undermining of the socio-economic system and our rules-based order.

Whilst corruption can have links to serious and organised crime it can, and does, take place at different levels in the private and public sectors. The public service in Ireland is generally perceived as having relatively low levels of corruption by international standards but we must remain vigilant to people using their position to act improperly.[1]

In Ireland, responsibility for tackling economic crime and corruption is managed across several government departments, state bodies and structures. While there is strong co-operation amongst the relevant entities in Ireland, there is a need to strengthen the overall framework for economic crime and corruption to effectively counter these threats. In recent years there have been several initiatives, including the 2020 "Review Group Report on structures and strategies to prevent, investigate and penalise economic crime and corruption" ("the Hamilton Report").[2] The Hamilton Report's recommendations established, among other measures, the Advisory Council, and led to legislative reform to render the investigation of economic crime more efficient and effective. It also set the Advisory Council the task of developing a Strategy to combat Economic Crime and Corruption ("the Strategy").

Economic crime and corruption threats endure, and criminals, organised crime groups and hostile actors continue to adapt and evolve. The level of sophistication of some types of economic crime, involving the weaponising of technology to defraud individuals, institutions, and the State and move illicit funds through the economy, requires a step-change in approach.

Our renewed approach, as outlined in the Strategy, will include enhanced data collection and sharing to help prevent crime and identify economic crime and corruption priorities, effective cross-sectoral coordination, coordinated preventative efforts, all underpinned by the tools and specialisation for implementation.

1. Transparency International, (2024), *Corruption Perceptions Index Ireland*
2. Hamilton Review Group, (2020), *Review of Structures and Strategies to Prevent, Investigate and Penalise Economic Crime and Corruption.*

Chapter 2 Context

Scope

The scope of economic crime and corruption in Ireland is extensive. It encompasses organised crime, financial fraud and money laundering. For the purposes of this Strategy, human trafficking and drugs trafficking – whilst carried out for monetary gain – are not included whilst the laundering of the proceeds of these crimes do come within its scope. Whilst beyond the scope of this Strategy, important work is being progressed across government on these matters, including in successive action plans to prevent and combat human trafficking and through other partnerships to tackle drugs trafficking. The following Advisory Council descriptions of economic crime and corruption will provide a clearer understanding as to what the Strategy is intended to address, and what falls outside its scope.

Economic crime

The Advisory Council refers to economic crime as a broad category of illegal activities involving money, finance or assets, the purpose of which is to unlawfully obtain a profit or a financial or professional advantage. It identifies the principal motive in such crimes to be economic gain. It includes criminal activity which:

- allows criminals to financially benefit from the proceeds of their crimes or fund further criminality;
- damages our financial systems and harms the interests of legitimate business;
- undermines the rule of law and the integrity of Ireland as a place to do business; and
- poses a risk to Ireland's prosperity, national security and international reputation.

This scope is broader than financial and white-collar crime as usually understood, and is intended to enable a holistic and comprehensive response to such types of economic crime as:

- Corruption and bribery
- Fraud against the individual, the private sector and the public sector
- Money laundering
- Terrorist financing
- Sanctions contravention
- Market abuse
- Anti-competitive cartels and bid-rigging

Corruption

The Advisory Council against Economic Crime and Corruption notes that there is no single universal definition of corruption. Given the complexity of behaviour, international bodies such as the UN and OECD use broad, working definitions rather than imposing a single binding one. Indeed, the United Nations Convention against Corruption ("UNCAC") refrains from providing a single definition of corruption. Instead, it focuses on identifying specific acts of corruption that should be established as criminal offences by every State adhering to the Convention.[3]

3. United Nations Office on Drugs and Crime,(no date), *What is Corruption.*

In Ireland, the Criminal Justice (Corruption Offences) Act 2018 ("the 2018 Act") defines 'corruptly' in a broad fashion as:

> Acting with an improper purpose personally or by influencing another person, whether -
> (a) by means of making a false or misleading statement,
> (b) by means of withholding, concealing, altering or destroying a document or other information, or
> (c) by other means.

The 2018 Act identifies and criminalises the following forms of corruption:[4]

- Active and passive trading in influence.
- A corrupt act in relation to an official's office.
- Giving a gift, consideration or advantage knowing that it will be used to commit a corruption offence.
- Creating or using false documents.
- Intimidation where a threat of harm is used instead of a bribe.
- Giving of corrupt gifts to connected persons, such as family members and close business associates.
- Corrupt political donations.
- Liability offence for bodies corporate where any individual connected with the company has been found guilty of corruption.

Threat picture

Fraud

Fraud is a pervasive economic crime familiar to all of us. It varies in its form but uses deceit to steal money, causing financial loss to individuals, businesses and the public sector. Incidents of fraud, deception and related offences were down by 56% in 2022[5] in comparison to the previous year, and fell by a further 3% in 2023.[6] An Garda Síochána reported an increase of over 90% in investment fraud in 2023, amounting to people being deceived out of over €28 million. Between January 2020 and August 2024, over €75 million was reported stolen in Ireland through investment fraud.[7]

Europol's report on decoding the EU's most threatening criminal networks reveals that fraud is the second most common activity of serious criminal networks across the EU.[8] The EU Serious and Organised Crime Threat Assessment ("EU-SOCTA") 2025 noted that online fraud is the most rapidly expanding sector of organised crime.[9] This exponential increase is driven by advancements in automation and Artificial Intelligence ("AI"), which leads to a more efficient and sophisticated fraud network. Business Email Compromise ("BEC") fraud and investment fraud remain the most common types of online fraud schemes, with cryptocurrency often being utilised as both a method of payment and an investment fraud product.

In recognition of the need to counter the fraud threat through better coordination and information sharing, Ireland's National Payments Strategy (2024)[10] established a National Cross-Sector Anti-Fraud Forum to bring together industry, regulators, law enforcement and government to drive a more unified and proactive response to tackling fraud.

Money laundering and terrorist financing

Organised crime generates billions of euros' worth of profits annually. Organised crime groups, terrorist organisations and hostile actors launder the proceeds of crime through legitimate markets in an attempt to conceal the source of these funds.

4. Gov.ie, (2021), *Criminal Justice (Corruption Offences) Act 2018*
5. Central Statistics Office, (2023), *Measuring Irelands Progress, Key Findings*.
6. Central Statistics Office, (2024), Recorded Crime Q4 2024
7. An Garda Síochána, (2024), *'An Garda Síochána warn of staggering amounts stolen in investment fraud so far this year'*.
8. Europol, (2024), *Decoding the EU's worst threatening criminal networks*.
9. Europol, (2025), *EU Serious and Organised Crime Threat assessment*.
10. Department of Finance, (2024), *National Payment Strategy*

Criminals exploit the interconnected nature of the financial sector to move illicit funds across borders. The cross-border nature of money laundering requires a deepening of international co-operation in partnership with our international and EU partners.

Enhanced anti-money laundering measures in the form of successive EU Anti-Money Laundering packages have put stronger rules in place to fight financial crime and illicit financial flows. In May 2024 the European Council adopted a package of new anti-money-laundering ("AML") rules. The EU AML package will protect citizens and the EU's financial system against money laundering and terrorist financing.

Risk assessments are key in identifying the system's vulnerabilities to, and risk from, money laundering and terrorist financing. In 2024 the Department of Justice, Home Affairs and Migration completed a Terrorist Financing Risk Assessment that assessed the risk to a range of financial and non-financial products from terrorist financing.

A wider-ranging national risk assessment, encompassing anti-money laundering, terrorist financing and proliferation financing, was published in June 2026.[11] The National Risk Assessment provides a broad assessment of a number of key priority sectors and evaluates money laundering/terrorist financing (ML/TF) risks, to enhance the understanding and to develop effective strategies to address them.

Sanctions contravention

Eliminating routes for illicit funds to enter the financial system is essential. In response to Russia's full-scale illegal and unprovoked military invasion of Ukraine, the EU introduced a Directive on establishing minimum rules concerning the definition of criminal offences and penalties for the violation of EU restrictive measures.[12] The goal of the Directive is to make it easier to investigate and prosecute violations of EU sanctions. Drafting of specific legislation targeting sanctions contravention (the Violation of Union Restrictive Measures) is currently underway.

Corruption

Corruption subverts the public and private sectors, breeds cynicism in society and undermines democratic institutions. It can cause huge damage to individuals, societies and economies. Whilst it features at all levels in society, Europol notes that corruption is an "indispensable instrument for organised crime" and it estimates that 60% of criminal networks operating in the EU use corrupt methods to achieve their objectives. Europol estimate that 71% of the most threatening criminal networks use some form of corruption, including 28% that use it systematically.[8]

According to Transparency International's Corruption Perception Index 2025, Ireland is perceived to be one of those countries to be least affected by public sector corruption, with Ireland ranking 12th out of 182 countries.[13] The European Commission's 2025 Eurobarometer report "Citizens' attitudes towards corruption in the EU in 2025" also found, in broad terms, that Irish citizens reported lower perceptions of corruption in Ireland than the EU average.[14] These findings are welcome, but it is imperative to avoid complacency. Ireland must continue to prioritise improvement to its anti-corruption framework.

Ireland has introduced legislation and a range of measures in recent times that has helped to embed both preventative and enforcement measures – which are essential elements of international corruption strategies. Legislation updating Ireland's ethics in public life obligations is long overdue, and its introduction will be key to ensuring the system is more resilient through strengthening preventative efforts.

11. Department of Finance, (2026), *National Risk Assessment Ireland 2026 - Money Laundering, Terrorist Financing, and Proliferation Financing.*
12. Directive (EU) 2024/1226 of the European Parliament and of the Council, 24 April 2024 *on the definition of criminal offences and penalties of the violation of Union restrictive measures and amending Directive (EU) 2018/1673, OJ L, 2024/1226*
13. https://www.transparency.org/en/cpi/2025/index/irl
14. EUROBAROMETER 548, (2025), *Citizens attitudes towards corruption in the EU.*

Anti-competitive cartels and bid-rigging

Bid-rigging is a serious form of anti-competitive cartel behaviour in which several suppliers come together and agree secretly not to bid against one another for a tender or contract. As a result, the winning tender price may be higher than the price that would be reached through genuinely competitive tendering. It is difficult to estimate the incidence of bid-rigging cartels as efforts are made to keep it hidden. But research and empirical studies have shown that internationally, the average overcharge in detected cartels is in the order of 20% to 30% and that detected cartels generally last, on average, four to seven years.[15] In Ireland, public bodies spend an estimated €20 billion annually on goods, services, works and capital projects. If even a small percentage of procurement processes were subject to bid-rigging in Ireland, this would mean extra costs for Irish taxpayers of tens or even hundreds of millions annually.

Ireland has recently introduced legislation that has helped to strengthen the enforcement powers available to the Competition and Consumer Protection Commission to combat anti-competitive cartels and bid-rigging. The Competition (Amendment) Act 2022 ("the 2022 Act") created a specific new criminal offence of bid-rigging. Under the 2022 Act, cartels (including bid-rigging cartels) can face prison sentences of up to 10 years. It also increased the maximum criminal fines for cartel and bid-rigging offences to a fine not exceeding the greater of €50 million or 20% of the relevant company's turnover in the previous financial year and introduced a new administrative enforcement regime.

Current structures addressing economic crime and corruption

Responsibility for combatting economic crime and corruption is spread across several government departments, organisations and fora.

A number of government departments are involved in tackling economic crime and corruption, including the Department of Justice, Home Affairs and Migration (which leads on anti-corruption policy and has responsibility for anti-money laundering/countering the financing of terrorism ("AML/CFT") policy with respect to matters within the criminal justice remit), the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation (which has responsibility for public integrity measures), the Department of Finance (which chairs the Government's Anti-Money Laundering Steering Committee ("AMLSC") and leads on wider policy for anti-money laundering and combating the financing of terrorism), the Department of Enterprise, Tourism and Employment (which leads on company law and competition law) and the Department of Foreign Affairs and Trade (which has responsibility for sanctions coordination).

Among the key bodies involved is the cross-sectoral, partnership-based Advisory Council against Economic Crime and Corruption which develops proposals on strategic and policy responses and is responsible for drafting this Strategy. The multi-departmental and multi-agency Anti-Money Laundering Steering Committee provides a national, cross-sectoral forum for the oversight and active review of Ireland's AML/CFT framework. A Cross-Departmental International Sanctions Committee ("CDISC") chaired by the Department of Foreign Affairs and Trade, coordinates the domestic implementation of sanctions in Ireland.

In terms of law enforcement, the Garda National Economic Crime Bureau ("GNECB") investigates serious and complex cases of economic crime and provides specialist support, guidance and training to regional economic crime investigators. An Anti-Corruption Unit tasked with the investigation of allegations of bribery and corruption is

15. Connor, J.M. (2014). *Price-fixing overcharges: Revised 3rd edition (SSRN Scholarly Paper No. 2400780). Social Science Research Network.* JConnor, J.M. Bolotova, Y.(2006) *Cartel overcharges: Survey and meta-analysis, International Journal of Industrial Organization, Volume 24, Issue 6, pp 1109-1137*

housed within the GNECB. The Garda Anti-Bribery and Corruption Unit investigates and prevents instances of bribery and corruption involving Irish citizens and business entities. The Garda Anti-Corruption Unit safeguards the reputation of An Garda Síochána itself by investigating potential corruption within the force. The Office of the Revenue Commissioners has an investigative and prosecutorial role as regards serious cases of tax and duty evasion. The Competition and Consumer Protection Commission has an investigative role regarding anti-competitive cartel activity including bid-rigging.

The Financial Intelligence Unit ("FIU (Ireland)") is a police-based unit located within the Garda National Economic Crime Bureau. FIU Ireland is the central reception point for all suspicious transaction reports from designated persons. It also receives reports from various supervisory bodies. FIU Ireland examines these reports and other information relating to money laundering and terrorist financing to prevent, detect and investigate such offences.

The Financial Crime Unit of the Office of the Director of Public Prosecutions has responsibility for prosecuting serious economic and corporate crimes.

Other bodies have an important compliance role, including the Central Bank of Ireland, which is responsible for the proper and effective regulation of financial service providers and markets, while ensuring the best interests of consumers of financial services are protected. It has specific responsibilities in relation to financial sanctions evasion, market abuse and the unauthorised provision of financial services and is the competent authority in Ireland for the monitoring and supervision of credit and financial institutions' compliance with their obligations under the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010. The Corporate Enforcement Authority has several functions including promoting compliance with company law. The Anti-Money Laundering Compliance Unit ("AMLCU") in the Department of Justice, Home Affairs and Migration is responsible for supervising those designated persons who are not subject to supervision by another competent authority.

Joint Intelligence Groups - informal partnerships between the Garda National Economic Crime Bureau, the FIU (Ireland) and the main financial and credit institutions - are key multi-stakeholder forums for the sharing of financial intelligence.

With responsibility spread across the system, establishing a coordinated cross-sectoral approach in pursuit of key goals is a core aspect of this Strategy and any future iterations of this Strategy.

Review of Structures and Strategies to Prevent, Investigate and Penalise Economic Crime and Corruption

In December 2020, the then Minister for Justice published a cross-government report which examines how best to tackle economic crime and corruption in Ireland: "Review of Structures and Strategies to Prevent, Investigate and Penalise Economic Crime and Corruption" ("the Hamilton Report").

An all-of-government implementation plan to progress the recommendations in the report was published in April 2021.[16] It sets out 22 actions to enhance enforcement and prevention capacity in the criminal justice sphere. The majority of the actions have been completed in full, with the remainder significantly advanced. Completed actions include the establishment of the Advisory Council against Economic Crime and Corruption and the Economic Crime and Corruption Forum, training and resourcing reviews, legislative changes and a review of public ethics legislation.

16. Hamilton Review Group, (2020), *Review of Structures and Strategies to Prevent, Investigate and Penalise Economic Crime and Corruption. Implementation plan.*

Ireland's economic crime and corruption laws

Ireland has a comprehensive legislative and operational framework to deal with economic crime and corruption. Much of Ireland's legislation dealing with economic crime, anti-corruption and bribery has been expanded in recent years. Ensuring that our legislation strives to be not just compliant with international standards but effective in practice is essential.

Significant measures are in place to ensure transparency and accountability in public life, including codes of conduct, access to information, asset declarations and rules around lobbying. The Protected Disclosures (Amendment) Act 2022 substantially strengthened and expanded the regime provided for under the Protected Disclosures Act 2014. It was fully commenced as of 1 January 2023. Among the innovations was the establishment of a new office of the Protected Disclosures Commissioner. In addition, several measures will be introduced to further enhance transparency. Further to the February 2023 publication of the Review of the Statutory Framework for Ethics in Public Life undertaken by the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation, the Government agreed to the preparation of a General Scheme for legislative reform informed by the outcome of the review. Since then, the Department has been developing detailed legislative proposals, with a view to bringing a draft General Scheme to Government for its consideration in the near term. These proposals will reform and consolidate ethics in public life legislation (declarations, cooling off periods, codes of conduct, conflicts of interest).

Recent legislative amendments in the Criminal Justice (Miscellaneous Provisions) Act 2023, states that a person who commits an act outside the state, which would be considered an offence if committed within the state, shall be deemed to have committed an offence under the law of the place where that act occurred. This provision will support the prosecution of foreign bribery cases in Ireland. To date, there have been no prosecutions in Ireland for the crime of bribing a foreign official.

The Criminal Justice (Theft and Fraud Offences) Act 2001, and the additional amendment Act of 2021, cover a range of measures to combat fraud, false accounting and involvement in the possession or laundering of the proceeds of crime. The Companies Act 2014 contains a variety of additional offences designed to combat fraud occurring through the course of business. The establishment of the Corporate Enforcement Authority ("CEA") under the Companies (Corporate Enforcement Authority) Act 2021 promotes compliance with - and enforcement of breaches of - company law.

The Competition Act 2002 prohibits anti-competitive cartels and bid-rigging. The Competition (Amendment) Act 2022 significantly increases the criminal and administrative penalties for companies and individuals that breach the 2002 Act.

The Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 ("the 2010 Act") and the subsequent amendment Act of 2018 provide the structure for Ireland's domestic AML measures. The 2010 Act further establishes the legislative basis for Ireland's FIU.

Ireland's criminal asset forfeiture system is set out in the Criminal Justice Act 1994. The Act provides for post-conviction-based asset confiscation. The Proceeds of Crime Act 1996 sets out the civil asset forfeiture system in Ireland. Under the civil system, a conviction on indictment is not required for an asset to be seized. The Criminal Justice (Mutual Assistance) Act 2008 provides for cross-border asset forfeiture with designated states under the Act.

Measures to expedite the disposal of seized assets and to deprive the holder of the use of such assets are forthcoming under the Proceeds of Crime and Related Matters Bill 2025.

All of these measures are key to ensuring that we have a robust legislative toolkit and supplementing them will be critical to enhancing Ireland's international reputation.

Relevant EU obligations

Ireland plays an active role in shaping EU economic crime and anti-corruption proposals and ensuring Ireland's positions are reflected in them. Ireland has opted into the EU's Combatting Corruption Directive[17], which is designed to tackle corruption through criminal law, allowing for better cross-border co-operation between competent authorities. Ireland has also opted into the Violation of EU Restrictive Measures Directive which aims to, among other things, approximate definitions of criminal offences related to the violation of EU restrictive measures and ensure effective and dissuasive penalties for these offences. Transposing this Directive will provide an opportunity to amend the law to ensure that violating EU sanctions is an arrestable offence, which should make enforcing the sanctions regime more effective.

The new EU AML package refers to a suite of new EU regulations and directives aimed at strengthening the fight against money laundering and terrorist financing (AML/CFT) by creating a unified framework, single rulebook and a new supervisory authority, the Anti-Money Laundering Authority ("AMLA").

The package includes:

- The Regulation establishing AMLA[18]
- The Regulation on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (the "Single Rulebook" or AMLR Regulation)[19]
- The Directive on the mechanisms to be put in place by Member States for the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (the 6th AML Directive)[20]

Trusted Flaggers – EU Digital Services Act ('DSA')

Article 22 of the Digital Services Act ('DSA')[21] gives effect to the statutory Trusted Flagger provision. The role of a Trusted Flagger is to identify, detect and flag illegal content within their area of expertise to online platforms. Online platforms are obligated to ensure that illegal content reported by Trusted Flaggers are given priority and dealt with in a timely manner.

Trusted Flagger status is granted to entities by the Digital Services Coordinator ('DSC') in the Member State in which they are established. Coimisiún na Meán is the DSC for Ireland.

Coimisiún na Meán is responsible for:

- Awarding Trusted Flagger status to entities which meet the accreditation conditions outlined in Article 22 of the DSA.
- Supervising online platform's compliance with obligations arising from Article 22.
- Supervising accredited Trusted Flagger's compliance with status conditions post-award.

17. COM Proposal Directive (EU) 2023/0135/COD of the European Parliament and of the Council *on combatting corruption, replacing Council Framework Decision 2003/568/JHA.*
18. Regulation (EU) 2024/1620 of the European Parliament and of the Council, 31 May 2024, *establishing the Authority for Anti-Money Laundering and Countering the Financing of Terrorism* OJ L, 2024/1620.
19. Regulation (EU) 2024/1624 of the European Parliament and of the Council, 31 May 2024, on the prevention of the use of the financial system for the purpose of money laundering or terrorist financing OJ L, 2024/1624.
20. Directive (EU) 2024/1640 of the European Parliament and of the Council, 31 May 2024, *on the mechanisms to be put in place by Member States for the prevention of the use of the financial system for the purpose of money laundering or terrorist financing*, OJ L 2024/1640.
21. Regulation (EU) 2022/2065 of the European Parliament and of the Council, 19 October 2022, *on a Single Market for Digital Services*, OJ L 277, Art 22

The Central Bank of Ireland ('CBI') has been awarded Trusted Flagger status for a three-year period (from 2 April 2025 to 2 April 2028). The CBI's area of expertise is financial fraud and scams, including the provision and/or offer of financial services without authorisation.

International obligations

Ireland is a party to a number of international anti-corruption conventions, including the Council of Europe Group of States against Corruption ("GRECO"), the UN Convention Against Corruption ("UNCAC"), the UN Convention against Transnational Organised Crime ("UNTOC") and the Organisation for Economic Co-operation and Development ("OECD") Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. Ireland is subject to regular peer evaluations and its compliance with these conventions are important markers of Ireland's progress in tackling corruption and bribery.

Ireland is a member of the intergovernmental Financial Action Task Force ("FATF"), which leads global action to tackle money laundering, terrorist and proliferation financing. FATF promotes global standards to mitigate the risks of money laundering and terrorist financing and assesses whether countries are taking effective action. It conducts peer reviews of members compliance with a series of FATF recommendations.

Chapter 3

Strategic Objective 1

Objective – Improve the collection, analysis and use of data to enable policymakers to develop evidence-informed policies to fight economic crime and corruption.

Overview

In Ireland, a substantial amount of data is collected on economic crime and corruption. Law enforcement, banks, the public and private sectors collect data for different reasons, be it for investigative, regulatory or enforcement purposes. However, there are gaps in our data collection. When data resides in separate systems and is analysed in isolation, it becomes exceedingly difficult to connect the dots and identify broader criminal threats and enterprises.

The clandestine nature of economic crime and corruption and the disparate nature of currently available data means that our current data picture on economic crime and corruption is incomplete. This makes it difficult to make accurate and real-time assessments.

What is required is data that is collected in a format that allows it to be analysed and compared, so that we can develop a strategic view of economic crime and corruption threats in Ireland.

Crime types evolve quickly and data that is collected in a consistent manner and a readable format can take time to emerge. Economic crime and corruption are increasingly organised, sophisticated and transnational in nature. Criminals adapt their methods to exploit vulnerabilities, making use of both mainstream and non-mainstream social media platforms to expand their global reach. To effectively confront this threat, we need to ensure that we have an up-to-date analysis of current and emerging threats.

Better use of current data

Ireland's framework for combating economic crime and corruption can be strengthened through thorough analysis of data that we already collect. One of the most relevant examples is suspicious transaction reports ("STRs"). The Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 places obligations on certain "designated persons" to report suspicious financial transactions to both the FIU (Ireland) and Revenue if they suspect a client has been or is engaged in money laundering or terrorist financing. The FIU also has systems in place on the GoAML portal to identify STRs with potential links to terrorist financing, especially if their origin or destination is linked to high-risk jurisdictions or conflict zones. A detailed analysis of STRs has the potential to be a rich source of information on crime threats, with valuable capability to discern trends.

Public procurement is another area where data should be analysed for signs of suspicious activity. The Hamilton Review recommended the introduction of legislation to allow An Garda Síochána and the Competition and Consumer Protection Commission ("CCPC") to analyse data on bids for public tenders which could help detect cartel behaviour, bid-rigging and any accompanying corruption offences. The CCPC is engaging with the Department of Enterprise, Tourism and Employment on proposed legislation that will provide a legal basis for the CCPC to compel the provision of access to public procurement data and empower the CCPC to screen public procurement data for bid-rigging indicators.

The use of Artificial Intelligence ("AI") systems in processing and analysing large datasets should be explored fully. AI and machine learning can be used by law enforcement to process large data sets, facilitating the interpretation of significant amounts of material more effectively, and in a far quicker timeframe than a human analyst alone. AI has the potential to make investigations more efficient. At present, almost two-thirds of large Irish companies are already using or piloting AI in financial reporting.[22] Whilst AI use may bring potential benefits, these must be balanced against the need to protect rights and ensure safeguards are in place.

The EU Artificial Intelligence (AI) Act[23], which came into force in August 2024, recognises the need for safeguards and has placed controls on the use of machine-based AI systems. The Act is designed to protect health, safety and fundamental rights, while fostering a competitive and innovative market for AI. Work is also well progressed on the development of a standards regime for AI systems, which will mean that AI systems used here in Ireland will be quality assured.

The National AI Strategy Refresh was launched in November 2024 by the Department of Enterprise, Tourism and Employment, and it commits the Department of Higher Education, Research, Innovation and Science to creating a National AI Research Nexus to unify AI research centres on a national scale.[24] The new National Digital and AI Strategy "*Digital Ireland – Connecting our People, Securing our Future*" was published in February 2026.[25] This Strategy is led by the Department of the Taoiseach and contains 20 high-level objectives, supported by 90 specific deliverables, covering public services, enterprise, digital and AI infrastructure, cyber security, digital regulation, online safety, and skills and talent.

The potential for the research ecosystem in Ireland to deliver research and innovation to support the fight against economic crime and corruption should be given due consideration. Using AI for research purposes should be in addition to academic research on economic crime and corruption.

A systemic approach

A systemic approach to the collection and analysis of data is required to establish an evidence base and set strategic priorities. Academia and civil society also have a role to play in contributing to the collection and analysis of public data and in pointing to emerging areas of concern.

By improving our collective understanding, we can identify the key threats that we face in Ireland and develop evidence-informed strategies to mitigate such threats as well as ensuring the system focuses its efforts where they are needed most.

Notwithstanding the challenges faced in the area of economic crime and corruption due to the challenges in data collation, it must be acknowledged that this is a broader issue that affects many areas of the criminal justice system. Further work with a wider range of stakeholders is necessitated to tackle this complex issue.

Intentional data design and integrity is a fundamental element of efficient and intelligent data systems. Data architects design and curate data systems, or data architecture, within organisations to create a cohesive and coherent data infrastructure and plan for future databases informed by the operational uses of the organisation's data. Organisations and agencies across the criminal justice sector should design, manage and deploy their data architecture in a manner which ensures that relevant data collection and collation across the sector can be aligned.

22. Brennan, Joe. The Irish Times, (17 June 2024), *"Nearly Two-Thirds of Large Irish Companies Using AI in Financial Reporting."*
23. Regulation (EU) 2024/1689 of the European Parliament and of the Council, 13 June 2024, *laying down harmonised rules on artificial intelligence*, OJ L 2024/1689.
24. Department of Enterprise, Tourism and Employment, (2024), *National AI Strategy Refresh 2024*.
25. Department of the Taoiseach, (2026), *Digital Ireland – Connecting our People, Securing our Future.*

The establishment of the Data as a Driver subgroup, with its focus upon the codification of criminal offences, is of key importance.[26] This is a significant step in developing a systemic approach to data collection and analysis, and can ensure that data is comparable between organisations and that insights are gathered.

Risk assessments

In addition to collecting data related to economic crime and corruption, risk assessments are a useful tool and should be conducted in specific sectors to ensure that we have a granular understanding of the key corruption and economic crime threats facing Ireland. Such assessments can identify and target national-level threats and ensure that we coordinate our focus on them. Given the uncertain geo-political outlook in the years ahead such assessments will be crucial in ensuring we prioritise action against the right threats.

The National Risk Assessment on AML, Terrorist Financing and Proliferation Financing supports the development and prioritisation of AML/CFT policies and activities through an assessment of the effectiveness and efficiency of the AML/CFT system. It also includes a threat and vulnerability assessment from money laundering and terrorist financing. The NRA was published in June 2026.

Risk assessments are also key to delving deeper into certain sectors, processes and cohorts considered to be at higher risk of corruption. The EU Directive on combatting corruption entered into force in April 2026, and requires Member States to carry out assessments to identify the sectors most at risk of corruption, and develop risk management plans to address the risks identified.[27] Ireland's membership of GRECO commits it to carrying out a risk assessment for people in top executive functions (politicians and law enforcement among others) considered to be at risk of targeting by corrupt actors. Carrying out risk assessments will identify the risks and facilitate the identification of appropriate mitigation measures to be put in place.

Recommendations

- Develop a unified approach to the collection, collation and analysis of data relating to incidences of economic crime and corruption to support the identification of strategic priorities.
- Consider how AI could potentially assist with the development of data collection systems and processes for economic crime and corruption.
- Conduct sectoral risk assessments to identify the key economic crime threats that we face in Ireland.
- Introduce specific legislation to enable the CCPC to access and analyse public procurement data in the State to detect and deter bid-rigging in public procurement.

26. The subgroup is comprised of representatives from the Courts Service, Department of Justice, Home Affairs and Migration, An Garda Síochána, Office of the Director of Public Prosecutions and the Central Statistics Office.

27. Directive (EU), 2026/1021 of the European Parliament and of the Council, 26 April 2026, *on combating corruption.*

Chapter 4

Strategic Objective 2

Objective – Develop a cross-sectoral approach to combat economic crime and corruption including through improved co-operation and information sharing.

Overview

Effectively combatting economic crime and corruption hinges on robust collaboration between public and private sectors. The complex nature of these crimes, often involving networks operating across sectors, and within an increasingly digitised society, necessitates a unified front.

Ireland has mechanisms and bodies that coordinate and share information, including the Advisory Council against Economic Crime and Corruption, the Economic Crime and Corruption Forum and the Joint Intelligence Group (a series of informal partnerships between the Garda National Economic Crime Bureau, the Financial Intelligence Unit (Ireland) and the main financial and credit institutions).

Current laws enable information sharing within the public sector and while it is considered sufficient, information silos between public and private organisations hinder the ability to fully leverage available data to effectively combat economic crime and corruption.

Information sharing

The sharing of information between private institutions, such as banks (private to private), between industry and law enforcement (private to public) and within the public sector (public to public) is critical in preventing fraud, economic crime and corruption.

Public to public

The public sector has mechanisms and bodies in place that coordinate and share information in relation to economic crime and corruption. This information sharing between state agencies significantly improves the efficiency and effectiveness of multi-agency prosecutions and investigations in economic crime and corruption cases and while legislative gateways exist across the sector and appear to be working well, they should be kept under review to ensure that they keep pace with future advancements.

Private to private

The banking sector indicates that it is unable to share information on suspected criminal and fraudulent activity within the banking and financial sectors having regard to data protection and privacy requirements.

Currently, if a bank or regulator has information on suspected criminal and fraudulent activity, the view is that such information cannot be shared with other institutions as there is no legal basis to do so.

Private to private information sharing in the form of a shared fraud database has been key to preventing fraud and economic crime in several jurisdictions. The National Fraud Database (NFD) in the UK, maintained by Cifas, (an independent, not-for-profit fraud prevention organisation), is a cross-sector database where member organisations share information about fraudulent conduct.[28] The NFD holds records of first and third-party fraud risk. To use the database, a Cifas member must operate within the terms of the National Fraud Database Handbook – a guide that sets out eight principles of use with accompanying guidance. Members record instances of fraudulent conduct against

28. CIFAS,(no date), *UK National Fraud Database Principles.*

their organisation to the relevant database, enabling other members to search against their data. When members confirm fraudulent conduct, they file their own case. Members must ensure that the data is interpreted in a proportional manner according to their own risk appetite and the product being assessed to ensure the quality, protection and lawful use of the data submitted and held on the National Fraud Database.

In Ireland, the absence of such a mechanism to share information impedes the effectiveness of Ireland's response to economic crime threats. This deficiency has been recognised by the financial sector and policymakers alike, and the Department of Justice, Home Affairs and Migration has prioritised the development of legislation to provide the necessary legal basis for a shared fraud banking database. Better and earlier information sharing can pre-empt suspicious transaction reports and better prevent fraud, illicit financial flows and related corruption. While the database will share fraud information across participating organisations and help to identify and prevent fraud, it is vital that there are suitable and specific measures in place to safeguard fundamental rights and freedoms. It is also critical that appropriate measures are taken by those operating and utilising the database to ensure that it is used strictly for fraud prevention purposes.

While the shared fraud database will address information sharing on a private-to-private basis for the banking sector, this is addressing one specific challenge in the larger economic crime and corruption landscape. Private-to-private information sharing should extend past financial institutions and should also include fintech, social media companies, online service providers and telecommunication companies. As new technologies emerge, such as generative AI, which are used to develop more realistic fraudulent narratives, it is vital that information sharing and collaboration systems are in place across these sectors to adequately address the increasing digitalisation of economic crime and corruption. For these reasons, implementing privacy preserving technologies and establishing robust data-sharing frameworks is crucial in the fight against economic crime and corruption.

Private to public

Enhanced legislative pathways are also required to allow more intelligence on financial crime to be shared within the economic crime and anti-corruption sector to counter criminal activity.

In Ireland, private to public information sharing mechanisms exist in the form of the Joint Intelligence Groups ("JIGs") which have proven useful in allowing for the identification of emerging typologies and trends. However, those taking part acknowledge the scope of information sharing at JIGs could be improved. Efforts should be made to build on the work of the JIGs to develop a freer flow of information between JIG members to address financial crime and corruption in Ireland.

The National Payments Strategy[10], published in October 2024, established the National Cross-Sector Anti-Fraud Forum to bring together various sectors (telecoms, financial services providers and online platforms) and regulators to share information on evolving trends and fraud prevention initiatives. The National Cross-Sector Anti-Fraud Forum established an information-sharing working group which met for the first time in May 2025. The working group is committed to developing a broad industry-level understanding of common financial fraud types encountered by financial services providers and online platforms. The working group also uses international best practice to inform discussions and agree on approaches of interest for the financial services sector as a whole.

While the National Cross-Sector Anti-Fraud Forum brings together key stakeholders to enhance collaboration in the fight against fraud, as highlighted earlier data protection and privacy concerns hinder the ability to share information freely and legislation is required to overcome these issues whilst ensuring the maintenance of appropriate safeguards.

Additional mechanisms to share information

The Regulation on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing contains a provision for EU-wide partnerships for information sharing on a private to private and public to private basis (Article 75). Other relevant articles of the Regulation are aimed at ensuring better information sharing between FIUs based across the EU.

The proposed EU Payment Services Regulation[29] may also support better information sharing as it envisages information sharing between payment services providers to prevent fraud (Article 83) and the establishment of a dedicated IT platform to allow providers to exchange information.

How other jurisdictions fight fraud

Various jurisdictions have established bodies or mechanisms to exchange information on a public to private and/or private to private basis, and share data in real time with the specific aim of preventing fraud. The Advisory Council has considered a number of approaches that can help coordinate government, law enforcement and the private sector to combat fraudulent scams. The following are some models of best practice internationally and consideration should be given to what mechanism may work in an Irish context.

Australian National Anti-Scam Centre

The Australian Government established the National Anti-Scam Centre in 2023 as a partnership between government, industry, law enforcement and consumer organisations. The centre works with others to find new ways to prevent scams by circulating information on how to spot and avoid scams, highlighting the most harmful scams and improving communication with more at-risk groups. This makes it easier to report scams and for victims to seek support. The centre has noted a downward trend in losses to scams since it was established, and it has suggested that this showed the importance of the public-private partnership model in protecting the citizen from scams.

Australian Financial Crimes Exchange

The Australian Financial Crimes Exchange ("AFCX") was set up in 2016 by Australia's four major banks to assist businesses in combatting financial crime.[30] AFCX is an independent, not-for-profit organisation through which the public and private sector share information for investigation and prevention purposes. It includes members from the financial services sector as well as telecoms and social media platforms. AFCX features a rapid alert system called the Active Threat Library, which provides real-time updates on active threats. Personal information is not shared in the Library; phone numbers and URL links are instead given. This data is analysed to produce broad insights into financial crime trends for all parties involved.

AFCX is funded by its members and is supported by the Commonwealth Attorney-General's Department. It is also a key element of Australia's National Organised Crime Response Plan.

29. Proposal for a Regulation of the European Parliament and of the Council *on payment services in the internal market and amending Regulation (EU) 1093/2010*
30. Information available from their website (Australian Financial Crimes Exchange, 2025)

Canadian Anti-Fraud Centre

The Canadian Anti-Fraud Centre creates and shares timely, accurate fraud-related intelligence and information to educate and assist citizens, businesses, law enforcement and government.[31] It is the central repository for fraud information and intelligence in Canada and is jointly operated by police and the Competition Bureau of Canada.

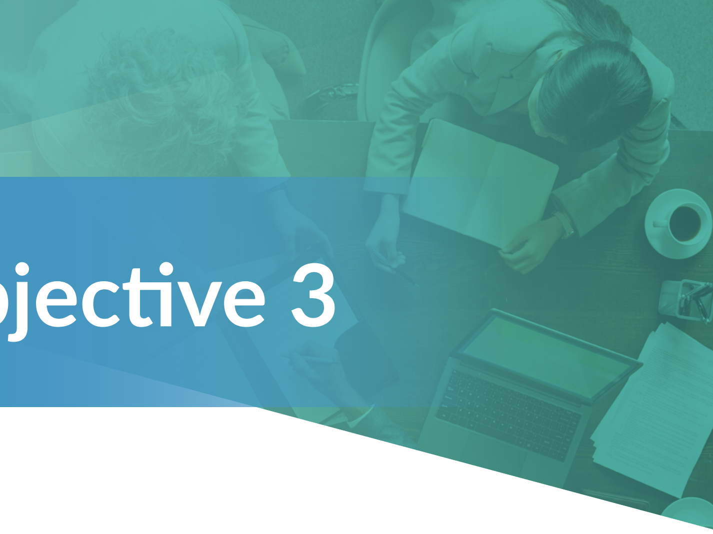
Anti-Corruption policy coordination

While the Department of Justice, Home Affairs and Migration has overall responsibility for corruption policy, many government departments and bodies have policy and implementation responsibilities in this area. Ireland is subject to a number of peer reviews in which countries evaluate each other's implementation of convention obligations, and issue reports and recommendations outlining the steps necessary to improve compliance with Convention obligations. These include GRECO, UNCAC and the OECD Foreign Bribery Convention. To better align corruption policy and implementation in Ireland, it is important to strengthen corruption coordination across government and agencies, and to broaden these efforts to include input from civil society and academia. The latter has a valuable role in bringing diverse perspective, expertise, and accountability, ensuring policies are evidence-based and responsive to public needs.

Recommendations

- Pursue a public-private partnership approach to better prevent, detect and pursue economic crime. This should include fintech, online service providers and telecommunications companies as well as the financial sector.
- Review and identify challenges with private-to-private information sharing and consider the necessity of introducing legislation where necessary.
- Develop legislation for a shared fraud database to enhance information and data sharing on a private-to-private basis.
- Enhance corruption policy coordination and knowledge sharing across government, civil society and academia.

31. Information available from their website (Canadian Anti-Fraud Centre, 2025)



Chapter 5 Strategic Objective 3

Objective – Ensure we have the specialisation and tools we need for the effective investigation and prosecution of economic crime and corruption.

Overview

The digitalisation of finance has provided opportunity for organised crime groups to launder illicit money in increasingly complex ways. Criminals use transaction chains to hide the source of funds and move them rapidly through different jurisdictions to evade law enforcement. They also abuse corporate vehicles and other legal instruments to launder the proceeds of corruption and economic crimes in an attempt to obscure their activity. Consequently, economic crime and corruption cases are often complex, time-consuming and resource-heavy to investigate and prosecute. An increase in specialisation, supplemented with the latest digital forensic tools and robust legislation would improve the effectiveness and efficiency of our approach. Future iterations of this Strategy and Action Plan will ensure that our legislation, technology and resources keep pace with emerging challenges.

Specialisation

The EU noted in its recent EU Rule of Law chapter on Ireland, that while the co-operation among responsible authorities is smooth, insufficient resources and specialisation remain a challenge for investigating and prosecuting corruption cases.[32] Having sufficient specialists in these roles is key to ensuring more disruption of economic crime and corruption. Innovative solutions on workforce planning could involve combining the expertise of the private sector with the experience and know-how of investigators and prosecutors.

Alongside this is the need for specialised training for investigators, prosecutors and others involved to keep pace with the fight against economic crime and corruption.

Increased complexity of economic crime prosecutions

Economic crime and corruption investigations require the analysis of voluminous amounts of digital evidence and often involve multiple jurisdictions. Ensuing prosecutions are document-heavy and reliant on highly technical forensic accounting and digital forensics evidence. Economic crime and corruption cases, which usually take weeks or even months to try, struggle to find sufficient priority and time in court lists. Increasing capacity and resourcing of the Office of the Director of Public Prosecutions and the courts system is not the only answer, as court time will, by necessity, be prioritised in favour of violent and sexual crime cases and/or cases where persons are in custody. However, consideration should be given to examining options to enhance the administration of justice, including increasing efficiencies in economic crime and corruption prosecutions and promoting specialist expertise amongst the judiciary and legal professionals.

Identifying efficiencies in economic crime and corruption cases

The introduction of pre-trial hearings as recommended by the Fennelly Report[33], the Hamilton Report and others, has been impactful in streamlining processes, moving the administrative burden to the start of

32. EU Commission, (2025), *Rule of Law Report Country Chapter on the rule of law situation in Ireland*, pp17.
33. The Working Group on Jurisdiction of the Courts (2003), report on *The Criminal Jurisdiction of the Courts ("The Fennelly Report")*.

the trial and allowing potential issues to be identified in advance, making the running of economic crime trials more efficient.[34]

However, given the volume of material involved in complex economic crime and corruption cases, case management by a specialist list, sitting or court could allow for the greater streamlining of cases. Paperless trials would also increase efficiencies in trials. Consideration should be given to the greater use of technology available and the introduction of such measures in Ireland.

Economic crime and corruption, by nature, is clandestine and can be difficult to uncover. As a result, instances of economic crime and corruption sometimes rely on self-reporting by individuals and/or institutions, considering their statutory compliance obligations. However, in criminal cases, an absence of formal mitigatory measures can be an obstacle to incentivising self-reporting and co-operation by individuals and institutions. Non-trial resolution measures ("NTRs"), such as deferred prosecution agreements, corporate remediation programmes, compliance undertakings, and administrative sanctions, have the potential to offer significant benefits in cases of economic crime, corruption and foreign bribery. Such measures can accelerate the resolution of complex investigations, reduce the financial and administrative burden on the courts, and facilitate resources to be focused on other high-priority cases. Crucially, these measures can also encourage co-operation from offenders, promote the recovery of misappropriated funds, and can provide greater certainty and transparency for both the public and businesses.

Such measures have been contemplated in the Irish context previously, including as part of the Law Reform Commission's Report on Regulatory Powers and Corporate Offences[35], and by the Hamilton Review Group. The latter was not convinced the introduction of a Deferred Prosecution Regime in this jurisdiction would yield any significant benefit given the challenging experience in the United Kingdom with respect to the measures at that time. However, over the past two years, the UK has enhanced its Deferred Prosecution Agreement ("DPA") regime. Notably, in December 2023, the Crown Prosecution Service ("CPS") entered into its first-ever DPA, marking a significant expansion of the mechanism beyond the Serious Fraud Office ("SFO").[36] This move aligns with the UK's broader strategy to encourage corporate self-reporting and co-operation with authorities. The SFO itself has introduced updated corporate self-reporting and co-operation guidance establishing a presumption of a DPA for organisations that voluntarily disclose misconduct, provided they meet specific co-operation criteria.[37]

Many countries beyond the UK have successfully introduced DPAs or similar NTR measures to address economic crime and corruption, particularly in the context of corporate wrongdoing, these include France, Germany, Italy, Switzerland, the United States, Canada, Australia and South Africa. Additionally, the OECD Working Group on Bribery has highlighted the efficacy of NTRs in addressing foreign bribery cases, noting their ability to secure timely enforcement, recover misappropriated funds, and promote corporate compliance.[38]

Critics of NTRs argue that such measures can lack transparency, may allow companies to avoid full accountability and risk creating inconsistent outcomes across cases. Such issues may be countered by structured independent oversight and monitoring, together with public reporting. Accordingly, it is an opportune moment to revisit the potential introduction of NTR measures in Ireland as part of measures to increase efficiencies, encourage self-reporting,

34. Criminal Procedure Act 2021

35. Law Reform Commission of Ireland, (2018), *Report on Regulatory Powers and Corporate Offences*.

36. R v Entain (2023), U20231779.

37. SFO, (2025), *External Guidance on Corporate Co-operation and Enforcement in relation to Corporate Criminal Offending*.

38. OECD (2019), *Resolving Foreign Bribery Cases with Non-Trial Resolutions: Settlements and Non-Trial Agreements by Parties to the Anti-Bribery Convention*

and provide a mechanism for structured compliance, monitoring and remedial measures for corporates.

Reviewing the legal framework

There are several key pieces of legislation under various stages of development that will supplement the fight against economic crime and corruption. Drafting of specific legislation targeting sanctions contravention (the Violation of Union Restrictive Measures) is currently underway and will be in place in 2026. Work on the development of a shared fraud database is currently being progressed. The Garda Síochána (Powers) Bill will fulfil a number of legislative actions outlined in the Hamilton Implementation Plan relating to access of seized electronic devices and technological advancements for warrants.

Beneficial Ownership

The EU AML Package will create a number of changes in relation to beneficial ownership, aimed at enhancing transparency, consistency and effectiveness in identifying beneficial ownership, set out in Regulation (EU) 2024/1624[21] and Directive (EU) 2024/1640[22]. Significantly, the definition of beneficial ownership moves to a directly applicable regulation to address divergent interpretations of the rules in different member states and inconsistent methods of calculating indirect ownership, hampering the transparency that was intended to be achieved. The deadline for transposition of the Directive is 10th July 2027.

Beneficial Ownership Registers in Ireland will be required to verify the beneficial ownership information submitted to the register.[39] This includes the power to request supporting documentation from the entity and carry out on-site inspections at the premises of legal entities if there are doubts about the accuracy of the information provided to the register. Registrars will also have enhanced powers for discrepancy reporting, and greater scope for prosecution. The aim is to ensure that the data is adequate, accurate, and up to date.

The Directive also provides a new standard for public access based on "legitimate interest." Registrars will be required to verify and grant access to a limited set of beneficial ownership information to a wider group of people who can demonstrate a legitimate interest in the data, such as journalists, civil society organisations, and certain individuals involved in transactions, and mutually recognise a legitimate interest claim granted in other Member States. This implements the 2022 Court of Justice of the European Union (CJEU) ruling, which restricted general public access.

Limited Partnerships

The Registration of Limited Partnerships and Business Names Bill will require non-EEA based partners to register beneficial ownership information with the Central Register of Beneficial Ownership of Companies and Industrial and Provident Societies ("RBO"). The intention behind this is to level the playing field with the existing beneficial ownership obligations of EEA-based companies and corporate bodies, whose beneficial ownership information would already be filed with the central register in the EEA country where they are based. The requirements for non-EEA based partners are modelled on existing requirements for companies and ILPs.

SMS filter

The Department of Culture, Communications and Sport is committed to combatting nuisance and unsolicited communications via voice calls or SMS text messages and are considering approaches, including those that would seek consumer consent in advance of the introduction of a SMS filter, along with what legislative instruments may be required to ensure that operators offer this type of service to their customers. Evidence from other jurisdictions shows that SMS scam filters block millions of scam texts thereby preventing a crime and depriving criminal groups of illicit funds.

39. *RBO, The Central Register of Beneficial Ownership of Companies and Industrial and Provident Societies, Central Bank of Ireland, Beneficial Ownership Register of Certain Financial Vehicles , Revenue, Central Register of Beneficial Ownership of Trusts.*

Necessary legislation

Information sharing

As set out in Chapter 4, further enhancements to facilitate private-to-private information sharing to combat economic crime and corruption are necessitated, including primary legislation to bring clarity to this fundamental area.

Corporate Liability

Whilst significant work has been undertaken in Ireland in recent years with respect to the overall enforcement and regulatory framework for tackling corporate offending, the attribution of corporate criminal liability remains an impediment to the successful prosecution of corporate bodies, particularly in relation to offences involving a subjective fault-based element, such as theft and fraud.[40] Necessary reform of corporate criminal liability is also of relevance when considering the potential utility of NTRs in Ireland, as there is no real incentive for corporate entities to engage in such measures in the absence of a real risk of successful prosecution.

The UK's Crime and Corporate Transparency Act 2023 introduced a failure to prevent fraud offence, in which an organisation will be liable where a specified fraud offence is committed by an employee or agent, for the organisation's benefit, and the organisation did not have reasonable fraud prevention procedures in place. Such a 'failure to prevent' approach to attribution of corporate criminal liability has already been introduced in Ireland, for example in s. 18 of the Criminal Justice (Corruption Offences) Act 2018, in which liability will be attributed based on organisational faults in a corporate body's systems or policies.

Adopting measures to tackle corporate offending enhances accountability and ensures that companies are held responsible for failing to prevent economic crimes, aligning with Ireland's approach with international best practices in corporate governance and fraud prevention.

International co-operation

With a view to improving international co-operation on economic crime and corruption with strategic non-EU countries, Ireland should progress extradition and information co-operation arrangements (mutual legal assistance). Furthermore, enhancing international judicial co-operation in criminal matters to effectively tackle cross-border organised crime would be invaluable to combat economic crime and corruption and Ireland should consider supporting all possible EU strategies for enhancing judicial ties with third countries. Of particular note is the European Judicial Crime Network (EJOCN) established by Eurojust. The Network collects information on national contact points, or competent authorities, to facilitate judicial co-operation in criminal matters and provides greater contextual information on national legal systems.

The conclusion of bilateral mutual legal assistance and extradition agreements represents a vital element of Ireland's strategic framework to strengthen its capacity to detect, investigate, prosecute, and deter economic crime and corruption. Such legal instruments facilitate the practical co-operation between Ireland and other states in the prevention and suppression of cross – border criminal activity. By establishing clear, legally binding arrangements for the exchange of information, the gathering of evidence, the tracing and confiscation of assets, and the surrender of fugitives, bilateral MLA and extradition agreements enhance the effectiveness and efficiency of Ireland's criminal justice system. Bilateral agreements facilitate the identification, freezing, seizure, and repatriation of the proceeds of crime, which is critical in addressing the financial incentives that drive economic crime and corruption.

The ability to cooperate effectively with international partners in an increasingly global economy is essential to addressing complex and transnational forms of economic crime

40. Law Reform Commission of Ireland, (2018), *Report on Regulatory Powers and Corporate Offences*.

and corruption. Robust bilateral arrangements complement Ireland's participation in multilateral frameworks and help to ensure that law enforcement and prosecution authorities have the practical tools that they need to protect the State's interest and uphold justice. Continuing to employ a strategically coordinated approach to Ireland's engagement with non-EU countries will be key in combatting cross border organised crime, and as such the Department of Justice, Home Affairs and Migration should continue to develop its work in this area.

Improving our toolkit

Regulators, law enforcement and prosecutors must have state of the art investigative technology and techniques to ensure effective and efficient investigation of economic crime and corruption. This may involve multi-stakeholder collaboration between the public sector and fintech.

A good example of public and private sector collaboration to combat financial crime is the Central Bank's Innovation Sandbox Programme. The theme of the first Innovation Sandbox Programme was Combatting Financial Crime. It aimed to combat financial crime by supporting the development of innovative solutions that minimise fraud, enhance know your customer, AML and counter terrorist financing frameworks and improve day-to-day transaction security for consumers. Seven participants took part in the programme, using new technology and innovative methods to develop solutions that tackle financial crime, for the benefit of both the financial system and consumers. The Central Bank has published a report of its findings during the Combatting Financial Crime Sandbox Programme in 2025.[41]

Criminals and organised crime groups use technology and opportunity to their advantage, which can be seen clearly in their misuse of crypto-assets. Irish law enforcement reports that criminals use virtual currencies to purchase illegal items online, thereby perpetrating further crime. The speed of technological developments in the financial and economic sector provides opportunity for criminals to move money rapidly through cyberspace and multiple jurisdictions. It's not one-way though, technology also provides law enforcement and regulatory bodies with the tools to track illicit finances, seize criminal assets and shut down opportunities for criminals.

Ireland's law enforcement and financial sectors should ensure that they have the tools and expertise they need to tackle current and future misuse of crypto and digital assets. Such an approach would improve the ability to track illicit financial flows and lead to more assets being seized and confiscated.

Artificial Intelligence as a law enforcement tool

Artificial intelligence ("AI") has changed the criminal and law enforcement environment greatly – and will continue to do so. AI augments law enforcement investigations and can make the investigation and prosecution of economic crime much more efficient. It can and should be used to analyse large amounts of data and help prevent, detect and investigate economic crime and corruption. However, its use by law enforcement must be balanced with privacy and ethical considerations and be subject to appropriate oversight. The use of profiling, for example, has been heavily regulated by the new EU AI Act.[23] AI-led criminal profiling without sufficient human intervention is strictly prohibited and AI-supported criminal profiling is considered high risk, depending on the extent of its use. The deployment of artificial intelligence - where appropriate - should be fully explored by all involved in the fight against corruption and economic crime.

While AI can be a useful tool in the fight against economic crime and corruption, it also comes with its threats. AI-driven fraud is a significant concern. It allows criminals to create convincing deepfakes for fraud,

41. Central Bank of Ireland, (2025), *Innovation Sandbox Programme Insights Report.*

romance scams and mimicking the voices of loved ones in danger for phishing. As highlighted by the EU-SOCTA 2025, AI is rapidly evolving and reshaping the organised crime landscape and online fraud schemes, increasingly driven by AI-powered social engineering and access to vast amounts of data including stolen personal information is becoming more sophisticated and dangerous.[9] It is vital that law enforcement understand the nature of AI in criminal conduct, in order to use it to their advantage.

Recommendations

- Carry out a study in relation to increasing efficiencies in the investigation and prosecution of economic crime and corruption cases to include a review of the feasibility of non-trial resolution measures such as deferred prosecution agreements.
- Review Ireland's corporate liability framework[42].
- Consider developing legislation to give effect to an SMS scam filter.
- Ireland should take part, where appropriate, in all EU measures that have an impact on the detection, investigation and prosecution of economic crime and corruption.
- Enhance international judicial and police-to-police co-operation in criminal matters with strategic non-EU countries.
- Carry out a study on the benefits and effectiveness of artificial intelligence (AI) in combatting economic crime and corruption.

42. Law Reform Commission of Ireland, (2018), *'Report on Regulatory Powers and Corporate Offences'*.

Chapter 6

Strategic Objective 4

Objective – Significantly improve our ability to seize and confiscate criminal assets.

Overview

Asset recovery and confiscation mechanisms are essential tools in the fight against economic crime and corruption. By identifying, freezing and confiscating illicitly obtained assets, these measures assist in disrupting criminal networks, deter future wrongdoing, and broader justice objectives. Effective asset recovery also reinforces the credibility and integrity of legal systems, signalling that crime does not pay and ensuring that financial gains from economic crime and corruption cannot be enjoyed with impunity. Notwithstanding, the recovery rate for the proceeds of crime is generally considered to be very low globally. Estimates suggest that the European Union only confiscates a small percentage of estimated criminal profits, around 1 to 2% annually.[43] Such low recovery rates allow criminal organisations to continue their activities and infiltrate legitimate economies.

Ireland's approach to asset recovery

Depriving criminals, organised crime groups and corrupt actors of assets has been a central plank of Ireland's approach to combatting economic crime and corruption since the 1990s. Ireland has a well-established non-conviction-based asset recovery and confiscation framework that continues to be supplemented with updated legislation. Indeed, measures to enhance the efficiency of the disposal of seized assets and to deprive the holder use of such assets are forthcoming under the Proceeds of Crime and Related Matters Bill 2025.

The Criminal Assets Bureau ("CAB") plays a key role in the State's tackling of criminal activity, in particular serious and organised criminal activity. It seeks to deny and deprive criminals of assets acquired through criminal conduct. The range of criminal conduct includes drug trafficking, theft, burglary, fraud and money laundering. CAB uses a multi-disciplinary partnership approach in its investigations into the suspected proceeds of criminal conduct. It works closely with international crime investigation agencies and has successfully targeted proceeds of foreign criminality from countries such as the US and the UK.

Under the Proceeds of Crime Act 1996 to 2016, CAB can freeze and seize assets which it shows to the High Court as the proceeds of criminal conduct, even when no criminal conviction has been obtained against the individual who owns or controls those assets. This is done on the civil standard of proof, which is known as a non-conviction based forfeiture. However, the only non-conviction-based procedure that can be utilised currently is provided for by Sections 38 and 39 of the Criminal Justice Act 1994, which applies only to cash. Bank accounts, art or luxury goods are not accounted for under these Sections. This is particularly relevant where there is an acquittal in a criminal prosecution and the options around the seizure of non-cash assets are limited. A review of the operation of the Criminal Justice Act 1994 would be beneficial in this regard.

Under the Criminal Justice Act 1994, the Office of the Director of Public Prosecutions (ODPP) plays a key role in relation to post-conviction asset recovery and confiscation. The ODPP uses this act to pursue confiscation

43. Report from the Commission to the European Council and Parliament, (2020), *'Asset Recovery and Confiscation'*.

orders, aiming to deprive criminals of the financial benefits gained from their illegal activities.

Ireland's asset confiscation system has been internationally rated to be only of a moderate level of effectiveness by the Financial Action Task Force (FATF).[44] FATF, whilst generally quite positive of the effectiveness of Irish asset forfeiture systems, noted the modest value of criminal proceeds confiscated and forfeited, relative to Ireland's risk profile. It suggested that the volume of criminal proceeds confiscated post-conviction could be improved, given the strength of Irish money laundering legislation. FATF further expressed concern over a lack of clarity regarding the routine tracing of assets abroad, which is necessary to prevent the proceeds of crime moving to other jurisdictions.

Asset recovery at EU/International level

The European Internal Security Strategy (ProtectEU)[45] forms one of the pillars of the EU's security policy, together with the Preparedness Union Strategy, the White Paper for European Defence Readiness 2030, and the planned European Democracy Shield. Protect EU aims to support Member States and includes provisions for a sharper legal toolbox, increased information sharing, and deeper co-operation amongst Member States. It calls on Member States to prioritise in particular the transposition of the recent Asset Recovery and Confiscation Directive.[46]

Currently, Ireland does not participate in several key international initiatives focused on asset recovery and confiscation, which could significantly strengthen future operational efforts in this area. For example, Interpol's Silver Notice allows member countries to issue alerts and request information globally on assets linked to criminal activities such as fraud, corruption, drugs trafficking and other serious offences. Participation in this mechanism would enhance Ireland's ability to trace and recover illicit assets across borders. Similarly, Project A.S.S.E.T., a Europol initiative, plays a vital role in the fight against serious international and organised crime by fostering co-operation among relevant partners. Its goal is to increase the volume of criminal assets seized worldwide.

Ireland is also not participating in EU and international instruments such as the Asset Recovery and Confiscation Directive[46], Regulation EU 2018/1805 on the Mutual Recognition of Freezing and Confiscation Orders[47], and the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds of Crime and on the Financing of Terrorism ('Warsaw Convention')[48]. Irelands non-participation in these instruments renders it significantly more difficult to freeze, confiscate and dispose of assets and the proceeds of crime, particularly on a cross-border and transnational basis. Given the increasing focus at EU and global levels on cross-border asset seizure, Ireland should consider opting in to these measures to improve our asset recovery outcomes.

The EU Directive on Asset Recovery and Confiscation sets out new EU-wide minimum rules on the tracing, identification, freezing, confiscation and management of property. It forms part of the broader effort to combat financial crime and to ensure the effective recovery of criminal assets across Member States. Ireland chose not to opt in to the directive at the early stages of negotiations due to concerns at that stage about its compatibility with Ireland's asset recovery framework but should reconsider opting into this measure.

44. FATF, (2017), *'Anti-money laundering and counter-terrorist financing measures'*, Ireland Mutual Evaluation Report.
45. EU Commission, (2025), *Protect EU: the European Internal Security Strategy.*
46. Directive (EU) , 2024/1260 of the European Parliament and of the Council, 24 April 2024, *on asset recovery and confiscation.* OJ L, 2024/1260
47. Regulation (EU), 2018/1805 of the European Parliament and of the Council, 14 November 2018, *on the mutual recognition of freezing orders and confiscation orders,* OJ L 303 28.11.2018.
48. The Council of Europe, (2005), *Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism,* Council of Europe Treaty Series – No. 198.

The Warsaw Convention provides for the effective recovery and confiscation of criminal assets and for international co-operation in financial crime investigations. Ratifying this Convention is timely as there are negotiations ongoing to add an Additional Protocol to the Convention given what the Council of Europe has identified as the need to have a stronger legal framework in place to facilitate international co-operation regarding asset recovery.

Seeking the return of the proceeds of crime is also a fundamental principle of UNCAC and parties to the convention have committed to ensuring the widest degree of co-operation to facilitate the cross-border return of assets. It was also one of the priorities of the corruption strand of South Africa's G20 Presidency 2025, of which Ireland was a guest country. Ireland's opting in to relevant EU directives and ratification of other conventions must be seen in this context.

Follow the money approach

International organisations such as FATF, UNODC and the OECD have widely endorsed the 'follow the money' approach as best practice for effective asset recovery and confiscation. This approach focuses on tracing, freezing and recovering the financial proceeds of crime to disrupt illicit networks, enhance enforcement, and prevent individual criminals and organised crime gangs from benefitting from their wrongdoing. Whilst Ireland's non-conviction based forfeiture regime has been successful in facilitating the aggressive pursuit of the proceeds of serious and organised crime, in order to effectively implement the 'follow the money' approach, Ireland must enhance its legal framework for conviction based forfeiture and ensure robust co-operation with international judicial authorities, law enforcement and networks.

Recommendations

- Ratify the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds of Crime.
- Opt-in to the EU's Asset Recovery and Confiscation Directive.
- Participate to the greatest extent possible in international operational initiatives, such as Interpol's Silver Notice and Europol's Project A.S.S.E.T, to bolster its operational capabilities and further improve Ireland's asset recovery outcomes.
- Review the Criminal Justice Act 1994 with respect to post-conviction based confiscation.

Chapter 7

Strategic Objective 5

Objective – Develop a coordinated approach to prevention through education, better communication and increased compliance.

Overview

Keeping the public informed about economic crime threats and corruption risks, both generally and in real time, can help protect people and eliminate opportunities for fraudsters and corrupt actors. To do this, a coordinated preventative approach that encompasses three elements is needed: education, information-sharing and wider knowledge of enforcement or other actions taken by regulators to counter economic crime and corruption.

Education

Education is a key element in preventing fraud and corruption. The National Financial Literacy Strategy[49], includes a section on countering fraud. Ensuring that people have sufficient levels of financial literacy and education can help ensure that people are protected against fraudsters. Ensuring the public are educated on corruption risks and norms is key to protecting them and our institutions from corruption.

Information sharing

Fraud and economic crime threats constantly change and are increasing in sophistication. With the increase in reports of investment and romance fraud in Ireland, it is essential that the public is kept informed about emerging economic crime threats and corruption risks. Doing so would provide the public with the information they need to keep them safe from the criminals who seek to deprive them of their earnings, savings and assets.

A rapid alert system to disseminate information on frauds to the public could be a potential model. A body that can analyse and disseminate information on fraud can inoculate the public against fraudulent scams and would complement the good work of FraudSmart, a fraud awareness initiative developed by the Banking and Payments Federation Ireland and several banks that provides advice on how to protect against the latest financial frauds.

The plethora of scams and frauds perpetrated through online platforms, social media and through more traditional telecommunications necessitates the involvement of these sectors in any rapid information sharing mechanism.

Increased information on enforcement action

In consultation undertaken to develop this Strategy, it has become clear that the public's level of awareness of the public ethics regime and the results of enforcement action against individuals and companies can be improved.

Publicising information on enforcement action would highlight publicly what is being done. Communicating this better should also further improve perceptions of the levels of corruption in Ireland and the State's actions to counter it.

Current campaigns

There are a variety of awareness raising campaigns in place as regards ethics obligations which are focused on ensuring

49. Department of Finance, (2025), *National Financial Literacy Strategy 2025-2029*.

public representatives are aware of their responsibilities. Similarly, several information campaigns are in place to ensure that lobbyists are aware of their obligations to file returns. Enterprise Ireland and others have made significant efforts to ensure that Irish businesses overseas are aware of their obligations under anti-bribery laws.

Several An Garda Síochána fraud campaigns are run at certain points of the year to ensure people are aware of specific scams, for example, warning students of fraud accommodation scams. These targeted campaigns continue to be necessary.

The CCPC frequently run public awareness campaigns to increase consumer awareness of the risks and range of scams faced by consumers. The CCPC has been running a dedicated bid-rigging awareness campaign over the last number of years which could be expanded to a joint campaign with An Garda Síochána to raise awareness about bid-rigging.

FraudSMART has launched two campaigns since the beginning of 2025. A campaign supported by Google, 'See the Scam Behind the Screen', focused on the dangers of social engineering tactics, where victims are manipulated or groomed into revealing confidential information. More than three quarters of Irish adults are being targeted with scam text messages, emails, phone calls or online content monthly according to the latest research conducted by FraudSMART.

FraudSMART has also partnered with the Irish SME Association (ISME) to launch an awareness campaign urging small and medium-sized enterprises ("SME") to be on the alert and put measures in place to protect their business. FraudSMART spotlighted the latest scams being targeted at businesses, including CEO impersonation fraud and invoice re-direction fraud, and offered practical fraud prevention tips through events and media appearances.

A coordinated approach to campaigns

Clearly, there is good work ongoing to raise awareness of fraud. However, these are disparate and discrete, targeting certain sectors – and rightly so. To strengthen our collective efforts, a coordinated multi-stakeholder approach to information campaigns is needed.

Any communications campaign must ensure that newcomers can be reached through effective and targeted methods. Ireland's demographics have changed remarkably in the past few decades. In 2024, the number of people who usually live in Ireland but were born elsewhere stood at 20% of the population.[50]

Periodic high level corruption information campaigns targeting specific at-risk sectors or populations may help people avoid corruption risks and strengthen attitudes towards the unacceptability of corruption in Ireland. Such campaigns may flow naturally from risk assessments of specific sectors. Information campaigns in different languages would help reach newcomers.

Given the number of people that are deceived by fraudsters, it is necessary that information campaigns target particularly vulnerable groups. This may include specific outreach to schools, colleges and universities and targeted information for specific cohorts. Information campaigns can also be used to inform members of the public and the private sector about upcoming legislative changes that will affect them.

Any communications campaign should also highlight avenues for reporting fraud and corruption as well as being consistent with the upcoming national literacy strategy.

50. Central Statistics Office, (2023), *Census of Population – Migration and Diversity*.

Recommendations

- Consider if campaigns could be coordinated as part of an overall national communications and education strategy in relation to frauds and scams.
- Develop coordinated high-level economic crime and anti-corruption information campaigns.

Annex 1 International commitments

Council of Europe Group of States against Corruption (GRECO)

Ireland joined GRECO in 1999 and is subject to peer monitoring on its compliance with a range of multifaceted legal instruments designed to improve the capacity of member states to fight corruption. Ireland has been evaluated in five rounds. One round is currently active as regards to Ireland – round five (covering the prevention of corruption and promoting integrity, in central governments (top executive functions) and law enforcement agencies). Ireland's Round four compliance, covering the prevention of corruption in respect of members of parliament, judges and prosecutors closed in June 2025 with the adoption of a final compliance report. Ireland will undergo a sixth-round evaluation on the prevention of corruption in sub-regional governance.

United Nations Convention against Corruption (UNCAC)

In 2011 Ireland ratified the UN Convention against Corruption which is the most comprehensive international legal instrument to combat corruption. Having ratified the convention, Ireland is peer reviewed in its implementation of the Convention. The review mechanism is comprised of two review cycles. Ireland completed the first review in 2014. The second review cycle – which commenced for Ireland in 2016 and is ongoing – covers preventive measures and asset recovery. Ireland will transpose the EU's Combatting Corruption Directive, which aims to tackle corruption through criminal law and improve cross-border co-operation. This Directive replicates many of the provisions of UNCAC (which Ireland has implemented in domestic law).

Organisation for Economic Co-operation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions

The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions was ratified by Ireland in 2003. The Convention is aimed at reducing corruption in developing countries by encouraging sanctions against bribery in international business transactions carried out by companies based in member countries. Ireland is subject to regular peer implementation review and has undergone three phase reviews. Ireland's next review (Phase Four) will take place in 2027. Phase Four will focus more closely on detection, enforcement, and corporate liability, and other major topics relevant to adequate implementation of the Convention's obligations.

Financial Action Task Force

The Financial Action Task Force (FATF) is a global money laundering and terrorist financing body. It sets international standards that aim to prevent these illegal activities. FATF carries out mutual evaluation reports which assess a country's implementation of measures to combat money laundering, terrorist and proliferation financing and their effectiveness. These peer-review reports analyse a country's AML and counter-terrorist financing system and include recommendations to further strengthen its system.

Annex 2

Annex 2: Methodology

The Advisory Council was tasked with drafting a multi-annual strategy and implementation plan. It met quarterly and provided direction, including establishing a number of thematic working groups and a drafting subgroup.

The five working groups considered the following themes: enhancing transparency and accountability; tackling illicit financial flows and responding to technological challenges; meeting international standards and enhancing international co-operation; raising awareness, education and capacity building; information sharing. A small subgroup made up of members of the Advisory Council was subsequently set up to guide the drafting of the strategy. A public consultation was carried out in Autumn 2024.

Pillar subgroups

The Advisory Council carried out a preliminary scoping exercise and established five working groups as a first step in the drafting of the strategy on economic crime and corruption. These working groups considered the following themes: enhancing transparency and accountability; tackling Illicit financial flows and responding to technological challenges; meeting international standards and enhancing co-operation; raising awareness, education and capacity building; and information sharing. Each working group was asked to consider:

- Details of relevant statistics and/or emerging trends for the previous five-year period
- Identification of the strengths and weaknesses in relation to the prevention, detection, investigation, prosecution, and enforcement of economic crime and corruption in Ireland
- Identification of emerging threats, challenges, and development in relation to the prevention, detection, investigation, prosecution, and enforcement of economic crime and corruption over the course of the next three years
- Consideration of solutions and/or developments in other jurisdictions
- Consideration of deliverables and routes to implementation in terms of a multiannual strategy.
- Each subgroup met several times, developing the five strategic objectives outlined in the strategy.

Public and stakeholder engagement

The Advisory Council carried out an online survey in October/November 2023 to ask members of the public about their concerns regarding economic crime and corruption and its impact on society, as well as asking what actions they think the government ought to prioritise when tackling economic crime and corruption. In total 465 people responded to the survey.

As Secretariat to the Advisory Council, the Department of Justice, Home Affairs and Migration worked with the Advisory Council to harness the expertise of council members and carried out an intense information gathering phase in the first six months of 2024, which involved bilateral meetings both domestically and internationally, together with desk-based research.

The Secretariat met with the Department of Finance, the Data Protection Commission, the Artificial Intelligence Advisory Council, the National Cyber Security Centre, ComReg, the Banking Payments Federation of Ireland, Transparency International, the UK Home Office, the National Economic Crime Centre in the UK, Europol and the United Nations Office on Drugs and Crime.

In the second half of 2024, an open call for written submissions was launched, seeking the public's views on what should be addressed in the strategy. The Advisory Council also carried out a stakeholder consultation event which was attended by representatives of the banking, business, telecoms and technology sectors. At this event, stakeholders had the opportunity to discuss issues under four broad strategic objectives – threat and risk, information sharing and co-operation, procedures, tools and capabilities and communication education and awareness.

Annex 3: Case studies

Case study 1: An Garda Síochána action against Black Axe

In early 2020, the Garda National Economic Crime Bureau ("GNECB") uncovered a Business Email Compromise (BEC) fraud scheme which had amassed a total of €1.1 million. The electronic devices seized during this investigation exposed an international criminal network known as Black Axe actively operating within Ireland. Emerging as a secret university society in West Africa in the 1970s, Black Axe has since evolved into a sophisticated, transnational criminal network laundering an estimated €64 million in Ireland alone over a 4-5 year period. Garda action against Black Axe spawned the establishment of the Interpol Operation JACKAL, named Operation SKEIN in Ireland, a cross-border operation currently spanning 21 countries on 5 continents.

The GNECB has coordinated three iterations of Operation SKEIN, commencing on an annual basis since 2022. Local Garda units have also assisted the GNECB in co-ordinating searches and detentions. Money laundering offences have been a particular target of the GNECB investigations, with a total of 96 individuals charged across Operations I and II. Developing sophisticated systems for detecting and reporting money laundering has been made possible through co-operation between the GNECB and various financial institutions. This engagement with financial institutions has been recognised by the GNECB as being vital to the success of an operation. Operation SKEIN II, for example, saw the recovery of over €400,000 from a total stolen cash sum of €475,000 in 7 cases involving Irish companies.

The targeted approach to pursuing Black Axe has also extended into public messaging, which the GNECB has used as an education-prevention tactic. The GNECB investigations have found that the vast majority of money mules, operating at the lowest level of the Black Axe organisation, are young people recruited through social media or social gatherings. The cross-body #dontbeaMule campaign includes both national and international bodies, representing not only a further extension of the GNECB's transnational approach to combatting organised fraud, but also a preventative mechanism to disrupt the chain of money laundering that allows organisations such as Black Axe to operate.

Case study 2: An Garda Síochána Anti-Corruption prosecutions

The Garda Anti-Corruption Unit ("GACU") was established in November 2020, following the Government's 'A Policing Service for our Future' plan, for the purposes of proactively preventing and detecting corruption. Whilst the Garda Síochána Ombudsman Commission (GSOC) plays an independent role in investigating corruption within the Gardaí, concurring internal action serves as an assertion of internal ethics and a reinforcement of police-community trust. As of February 2024, it was reported that there are approximately 20 live criminal investigations by the GACU into members of An Garda Síochána, and these range from burglary offences, to perverting the course of justice and perjury, as far as false imprisonment of a female.

Coercive force has been recognised to have a potentially corrupting influence. According to a briefing document from the Garda Commissioner circulated in 2020, corrupt coercive force may extend to any gain, financial or material, arising from an abuse of authority. To inform police discretion, GACU has published three policies spanning overall Anti-Corruption measures, Professional Boundaries and the Abuse of Power for Sexual Gain, and a Substance Misuse (Controlled Drugs) policy. The latter was recently realised in the Garda Síochána (Functions and Operational Areas) Act 2022, which contained provisions for the introduction of substance misuse testing in An Garda Síochána and is currently obligatory for those entering the force. In 2022, GACU implemented a number of educational measures both internally and externally, engaging with international police forces for the purpose of professional development.

Whilst implementing prevention measures is notable, detection of misconduct poses a separate challenge. Numerous studies have found that police officers across various jurisdictions typically expect their colleagues not to report them. It is also typical to find high levels of co-operation and trust between police officers. To combat this paralysis, the GACU focuses their investigations on what is determined to be sufficiently serious misconduct; such as using coercive control off-duty, sexual offences, and driving under the influence. Focusing on serious incidences avoids alienating officers and the GACU, and it encourages reporting on the basis of maintaining Garda integrity. In cases of serious misconduct, a Garda may be suspended pending the results of a GACU investigation, and in less serious cases, a Garda may be assigned to a non-public facing role during the period of the investigation.

Annex 4

Annex 4: Glossary

Account Takeover Fraud (ATO)	A form of identity theft where fraudsters take unlawful control of an online account and pose as the legitimate user(s)
AGS	An Garda Síochána
AML	Anti Money Laundering
Beneficial Ownership	The individual(s) who ultimately owns or controls a legal entity, either through direct or indirect ownership of a sufficient percentage of the shares, voting rights or ownership interest in the entity
Bilateral Extradition	The formal process whereby a State makes a request to another State for the return of a person accused or convicted of a crime to stand trial or serve a sentence in the requesting State
Bribery	The Criminal Justice (Corruption Offences) Act 2018 defines bribery as corruptly offering, giving, or accepting from a person, a gift, consideration, or advantage as an inducement to, reward for, or otherwise on account of, any person doing an act in relation to their office, employment, position or business
Business Email Compromise Fraud (BEC)	An email-based fraud designed to trick an individual into sending money or divulging confidential company intelligence
'Card Not Present' Fraud	A type of credit card fraud in which the criminal uses the details of a victim's credit card to make purchases online, by mail, or over the phone
CCPC	Competition and Consumer Protection Commission
Consumer Fraud	Deceptive business practices such as false promises or inaccurate claims that cause consumers to suffer financial or other losses
Complex Transaction Chains	A method used to launder illicit funds involving multiple accounts or intermediaries that obscures the source and transaction history of illicit funds to avoid detection by financial institutions and law enforcement agencies
Corruptly	The Criminal Justice (Corruption Offences) Act 2018 defines behaving 'corruptly' as acting with an improper purpose personally or by influencing another person, whether - (a) by means of making a false or misleading statement, (b) by means of withholding, concealing, altering or destroying a document or other information, or (c) by other means
Cybercrime	Criminal acts committed online through the use of electronic communications networks and information systems

Deferred Prosecution Agreements	An agreement between a prosecutor and an undertaking in which the prosecutor agrees to dismiss criminal charges if the undertaking complies with certain conditions that are deemed to be in the interest of the public good
Digital Forensic Tools	Hardware and software tools that can be used to recover and preserve digital evidence
Economic Crime	A broad category of illegal activities involving money, finance, or assets to unlawfully obtain a profit or a financial or professional advantage
FATF	Financial Action Task Force
'Failure to prevent fraud' Offence	Whereby organisations may be held criminally liable if they fail to prevent fraud committed by a person on behalf of the organisation with the intention of benefiting the organisation or their clients
Financial Literacy	People's awareness, behaviour, knowledge, attitudes, and skills in relation to money and finances
Fintech	Computer programs and other technology used to support or enable banking and financial services
FIU	Financial Intelligence Unit
Foreign Bribery	When companies offer, promise, or give a bribe to a foreign official to win advantages in international business transactions
Fraud	Whereby a natural or legal person knowingly deceives another to do or refrain from doing an act with the intention of profiting from this deception or causing another party to suffer a loss
GACU	Garda Anti-Corruption Unit
Generative AI	Machine Learning models that can be used to create content such as text, images, audio, etc
GNECB	Garda National Economic Crime Bureau
GRECO	Council of Europe Group of States against Corruption
GSOC	Garda Síochána Ombudsman Commission
Illicit Financial Flows	The movement of money across borders that is illegal in its source, its transfer, or its use
Illicit Funds	Money, including cryptocurrency, that is illegal in its source
Insurance Fraud	Intentionally deceiving or misleading an insurance company during the application or claims process or the wrongful denial by an insurance company to process a legitimate insurance claim
Investment Fraud	When a fraudster poses as an investment service provider, Financial Advisor or fund manager to convince an individual to transfer large sums of money into a non-existent company or service
JIG	Joint Intelligence Group
Large Language Model (LLMs)	A machine learning tool that is designed to predict and generate possible language usage by estimating the probability of a word, sentence, or phrase occurring within the context of a larger body of text. For the purposes of fraud detection, LLMs will flag content that is generally associated with attempted fraud

Machine Learning	The use and development of computer systems that are able to learn and behave autonomously through increased exposure to data and the development of algorithms to interpret and infer patterns arising from the data
Money Laundering	The process by which illicit funds are filtered or 'washed' through the financial system in an effort to disguise their illegal nature
Money mule	A person who transfers illicit funds between different bank accounts, very often in different countries, on behalf of others
Mutual Legal Assistance	The process by which States seek for and provide assistance to other States in the servicing of a judicial document and the gathering of evidence for use in criminal cases
Natural Person	An individual person as opposed to a legal identity such as a company.
NTR's	Non-Trial resolution measures
OECD	Organisation for Economic Co-operation and Development
Phishing	The use of fraudulent emails, text messages, phone calls, or websites to deceive people into sharing sensitive data, downloading malware, or otherwise exposing themselves to financial cybercrime
Rapid Alert System	A system that facilitates the rapid exchange of information on real-time risks to the public
Shared Fraud Database	A database accessible to the banking sector to help identify and prevent fraud through the systemised sharing of relevant information across participating organisations
Smishing	The fraudulent practice of sending text messages purporting to be from reputable companies in order to introduce individuals to reveal personal information, such as passwords or credit card numbers
SMS Scam Filter	A tool designed to block malicious SMS attempting to mislead or deceive a person into using or engaging with a fraudulent link or telephone number
Suspicious Transaction Reports (STRs)	Reports that designated persons under the Criminal Justice (Money Laundering & Terrorist Financing) Act 2010 are obliged to make to both the Financial Intelligence Unit (FIU) and Revenue if they know, suspect, or have grounds to suspect that a client has been or is engaged in money laundering or terrorist financing
Terrorist Financing	Any means or methods, legitimate or unlawful, used by terrorist organisations to finance their illegal activities
UNCAC	United Nations Convention Against Corruption
UNTOC	United Nations Convention Against Transnational Organised Crime
Vishing	The fraudulent practice of making phone calls or leaving voice messages purporting to be from reputable companies in order to induce individuals to reveal personal information such as bank details and credit card numbers
White-Collar Crime	A catch-all term for corruption, fraud and related offences committed by corporations or by professionals in the context of their work

An Roinn Dlí agus Cirt,
Gnóthaí Baile agus Imirce
Department of Justice,
Home Affairs and Migration