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um Chearta an Duine
agus Comhionannas
Irish Human Rights and
Equality Commission

An Rapóirtéir Náisiúnta
um Gháinneáil ar Dhaoine
a Chosc

National Rapporteur
on the Trafficking of
Human Beings

Child Trafficking in Ireland including ICT-Facilitated Child Trafficking

Irish Human Rights and Equality Commission

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The Irish Human Rights and Equality Commission was established under statute on 1 November 2014 to protect and promote human rights and equality in Ireland, to promote a culture of respect for human rights, equality and intercultural understanding, to promote understanding and awareness of the importance of human rights and equality, and to work towards the elimination of human rights abuses and discrimination.

This report was prepared for the Irish Human Rights and Equality Commission by Tegwyn Stephenson, an independent research consultant.

The report presents an insight into stakeholders' perspectives on child trafficking in Ireland and the State's response.

The stakeholder opinions expressed within this report remain those of the stakeholders interviewed and do not necessarily reflect the views or position of the Irish Human Rights and Equality Commission.

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Abbreviations

AGS	An Garda Síochána (Irish police)
AIA	Administrative Immigration Arrangements for the Protection of Victims of Trafficking
CAMHS	Child and Adolescent Mental Health Services
CHI	Children's Health Ireland
CNAM	Coimisiún na Meán (Ireland's Online Safety Commission)
CSOs	Civil Society Organisations
DCDE	Department of Children, Disability and Equality,
DJHAM	Department of Justice, Home Affairs and Migration
DPP	Director of Public Prosecutions
EC	European Commission
ECPAT	Network of Civil Society Organisations that works to end child sexual exploitation
EU	European Union
Eurojust	European Union Agency for Criminal Justice Cooperation
Europol	European Union Agency for Law Enforcement Cooperation
ESRI	Economic and Social Research Institute
GRETA	Council of Europe Group of Experts on Action against Trafficking in Human Beings
HIQA	Health Information and Quality Authority
HSE	Health Service Executive
HSE AHTT	HSE Anti-Human Trafficking Team
ICI	Immigrant Council of Ireland
ICT	Information and Communication Technology
IEA (Tusla)	Intake Eligibility Assessment
IHREC	Irish Human Rights and Equality Commission
IOM	International Organization for Migration
IPAS	International Protection Accommodation Service
IPO	International Protection Office

IRC	Irish Refugee Council
LAB	Legal Aid Board
LRC	Law Reform Commission
MRCI	Migrant Rights Centre of Ireland
NAP	National Action Plan
NRM	National Referral Mechanism for the Identification of, and Assistance to, Victims of Trafficking
OCG	Organised crime groups
OCO	Ombudsman for Children Office
ODIHR	Office for Democratic Institutions and Human Rights (part of OSCE)
OSCE	Organization for Security and Co-operation in Europe
PSNI	Police Service of Northern Ireland
SCSIP (Tusla)	Separated Children Seeking International Protection Unit
SERP	Sexual Exploitation Research and Policy Institute
SEA	Special Emergency Arrangements (Tusla)
TCA	Trafficking for Criminal Activities
TCE	Trafficking for Criminal Exploitation
TFM	Trafficking for Forced Marriage
THB	Trafficking in Human Beings
TLE	Trafficking for Labour Exploitation
TSE	Trafficking for Sexual Exploitation
Tusla	The Child and Family Agency
UK	United Kingdom
UN	United Nations
UNODC	United Nations Office on Drugs and Crime
US	United States of America
WRC	Workplace Relations Commission

Executive Summary

Child trafficking is a complex, evolving, and significantly under-recognised issue in Ireland, particularly in the context of increasing digitalisation. This report presents the findings of research examining Ireland's response to child trafficking and ICT-facilitated child trafficking, with a particular focus on prevention, identification, protection and support for child victims. The research draws on desk-based analysis and stakeholder interviews.¹

Our research found that child trafficking remains significantly under-identified in Ireland, including among Irish children. Stakeholders consistently raised such concerns, including that children experiencing exploitation are too often being overlooked, misidentified or treated primarily through criminal justice or child protection lenses rather than as potential victims of trafficking.

The current scale of under-identification, combined with the rapid evolution of online-enabled exploitation, requires urgent and sustained action across State and frontline services.

While legislative and policy frameworks have developed in recent years, serious challenges remain in ensuring that systems are fully effective in identifying and protecting child victims. These include delays in operationalising the statutory National Referral Mechanism (NRM), inconsistent understanding of the legal definition of child trafficking, and limited capacity to identify newer and emerging forms of exploitation such as criminal exploitation and ICT-facilitated grooming, recruitment and control. The research highlights the growing role of digital technologies in facilitating child trafficking and exploitation. Social media platforms, online communication tools and gaming environments are increasingly being used to target, groom, recruit and exploit children. These developments require a strengthened and coordinated response across prevention, investigation and regulation – the current response has not kept pace with the scale or complexity of these risks.

¹ The research draws on desk-based analysis and stakeholder interviews across government, law enforcement, civil society and international organisations. The findings and recommendations were further refined through a stakeholder validation process.

Our research also found clear and immediate opportunities for progress, particularly the importance of improved coordination across agencies, enhanced training and awareness, and a more child-centred and trauma-informed response. This report sets out practical recommendations for strengthening Ireland's response to child trafficking, including ICT-facilitated exploitation. It calls for urgent action to improve prevention, identification, protection, and assistance systems.

Ultimately, the report provides a practical and evidence-based framework for a more coordinated, child-centred and future-focused response to child trafficking in Ireland. The key findings and priority recommendations, as identified through the research and validation process, are set out below.

Key Findings

1. Child trafficking remains significantly under-identified.
2. Misunderstandings of the legal definition of child trafficking may contribute to under-identification.
3. Implementation of the new statutory National Referral Mechanism is urgently needed.
4. Children involved in criminal activity may be victims of trafficking or exploitation but are not routinely being identified as such.
5. ICT-facilitated exploitation is a growing concern.
6. Children in State care and unaccompanied minors face heightened protection gaps and exploitation risks.
7. Child victims and at-risk children are not receiving adequate and specialised supports.
8. Training, awareness raising and multi-disciplinary cooperation are critical to improving responses.

Main Recommendations

Below is the summary list of recommendations.

Detailed and full recommendations are at the end of this report.

1. Legislative Reform

- (a) Ensure full and timely transposition of Directive (EU) 2024/1712
- (b) Ensure consistent application of definition of child trafficking
- (c) Consolidate child trafficking offences within a coherent legislative framework
- (d) Strengthen legislative safeguards for child victims of criminal exploitation
- (e) Review legislative responses to ICT-facilitated child trafficking

2. Identification of Child Victims and the National Referral Mechanism

- (a) Operationalise the statutory NRM without further delay
- (b) Establish a statutory child-specific NRM or a child-specific pathway within the NRM
- (c) Establish a national focal point for child victims of trafficking
- (d) Provide specialised training for all bodies participating in the NRM
- (e) Introduce clear timelines and accountability mechanisms within the NRM
- (f) Strengthen the role of statutory child protection services in identification

3. Supports and Services for Child Victims

- (a) Ensure child victims have immediate access to specialised, child sensitive protection and supports
- (b) Strengthen the role and resourcing of child protection services
- (c) Expand and ensure quality of multi-disciplinary child protection models, such as the Barnahus model
- (d) Strengthen victim identification and support through the 'Social Path' approach
- (e) Review age assessment procedures to ensure child protection safeguards
- (f) Develop specialised accommodation for child victims of trafficking

4. Investigations and Prosecutions

- (a) Strengthen specialised investigative capacity to address child trafficking
- (b) Develop specialised capacity to investigate ICT-facilitated child trafficking
- (c) Provide specialised training for investigators, prosecutors and the judiciary
- (d) Ensure the consistent application of the non-punishment principle
- (e) Review cases involving children convicted of offences where indicators of trafficking may have been present
- (f) Strengthen protections for child victims during criminal proceedings
- (g) Enable and ensure access to compensation for child victims of trafficking

5. Prevention

- (a) Strengthen cross-sector training on child trafficking and exploitation
- (b) Expand education and digital literacy initiatives for children
- (c) Support community-based prevention and awareness initiatives
- (d) Ensure transparent and equitable State funding for awareness-raising initiatives
- (e) Strengthen measures to reduce vulnerability to child trafficking
- (f) Strengthen efforts to reduce demand for exploitation
- (g) Strengthen prevention strategies addressing ICT-facilitated exploitation

6. Partnerships

- (a) Strengthen international cooperation in combatting child trafficking
- (b) Strengthen cross-border cooperation between Ireland and Northern Ireland
- (c) Strengthen national multi-agency cooperation
- (d) Strengthen engagement with civil society organisations
- (e) Ensure meaningful consultation with civil society in policy development
- (f) Strengthen engagement with private sector to address online exploitation

7. Data Collection and Evidence-Based Policy

- (g) Strengthen national data collection on child trafficking

- (h) Ensure trafficking for sexual exploitation is consistently recorded as child trafficking
- (i) Collect data on both presumed and formally identified victims
- (j) Establish clear responsibility for the collection, analysis and reporting of trafficking data
- (k) Strengthen research and monitoring relating to child trafficking
- (l) Support monitoring and evaluation of national anti-trafficking policies

1. Introduction

The Irish Human Rights and Equality Commission (the Commission/IHREC) is Ireland's independent National Human Rights Institution and National Equality Body.² We protect and promote equality and human rights in Ireland.³

We are also the Independent National Rapporteur on the Trafficking of Human Beings;⁴ the Independent Monitoring Mechanism for Ireland under the United Nations Convention on the Rights of Persons with Disabilities;⁵ and are expected to be assigned the role of the Co-ordinating National Preventive Mechanism under the Optional Protocol to the Convention against Torture,⁶ pending ratification. Alongside Northern Ireland's human rights and equality bodies, we have a mandate to consider and report on equality and rights issues with an island of Ireland dimension.⁷ We also have legal powers under the Gender Pay Gap Information Act 2021,⁸ and a fundamental rights role in relation to the EU Artificial Intelligence Act.⁹

We are mandated to keep under review the adequacy and effectiveness of law and practice in the State relating to the protection of equality and human rights; and to make recommendations to the Government in relation to the measures that we consider should be taken to strengthen, protect and uphold equality and human rights in the State.¹⁰ We assist public bodies with their statutory obligations under the Public Sector Equality and Human Rights Duty to have regard to the need to eliminate discrimination,

² Established under the [Irish Human Rights and Equality Commission Act 2014](#).

³ See our recently published Strategy Statement 2025-2027: IHREC (2025), [Strategy Statement 2025-2027](#).

⁴ IHREC, [Commission Takes on New Role as Ireland's National Rapporteur on the Trafficking of Human Beings](#) (2020).

⁵ Section 103 of the [Assisted Decision-Making \(Capacity\) \(Amendment\) Act 2022](#).

⁶ To be provided under the Inspection of Places of Detention Bill, when enacted. See [Draft General Scheme Inspection of Detention Bill 2022](#).

⁷ We work with the Northern Ireland Human Rights Commission (NIHRC) in the Joint Committee, as set out in the Belfast Good Friday Agreement. Following the UK's withdrawal from the EU, we also comprise the Article 2(1) Working Group of the Dedicated Mechanism, along with the NIHRC and the Equality Commission for Northern Ireland (ECNI).

⁸ [Gender Pay Gap Information Act 2021](#).

⁹ Article 77 of the [European Union Artificial Intelligence Act 2024](#). Department of Enterprise, Trade and Employment, [Minister Calleary announces key milestone in the implementation of the EU regulation on AI](#) (31 October 2024).

¹⁰ Section 10(2) of the [Irish Human Rights and Equality Commission Act 2014](#).

promote equality and protect the human rights of their staff, customers, service users and everyone affected by their policies and plans.¹¹

Independent National Rapporteur on Trafficking of Human Beings

In 2020, pursuant to the EU Anti-Trafficking Directive, IHREC was designated Independent National Rapporteur on Trafficking of Human Beings with the role of the assessment of trends in trafficking in human beings, the measuring of results of anti-trafficking actions, including the gathering of statistics in close cooperation with relevant civil society organisations active in this field, and reporting.¹²

In our capacity as National Rapporteur, IHREC regularly reports to international bodies such as the European Commission and the Council of Europe Group of Experts on Action against Trafficking in Human Beings ('GRETA'). We also prepare independent reports of State action and thematic reports on specific areas.

Child trafficking in Ireland, including ICT-facilitated child trafficking

The Irish State has committed to prioritising the identification and protection of victims of child trafficking,¹³ described by the European Commission as a:

“severe form of human exploitation, violence against children, child abuse and violation of children’s rights’ which is ‘rapidly evolving and multi-faceted.’”¹⁴

Children are particularly susceptible to becoming victims of trafficking in human beings (THB).¹⁵ This special vulnerability was recognised by the United Nations in 2000 in the

¹¹ Section 42 of the [Irish Human Rights and Equality Commission Act 2014](#).

¹² Article 19 of the [EU Anti-Trafficking Directive \(2011/36/EU\)](#)

¹³ Irish Government (2023), [Third National Action Plan to Combat and Prevent Human Trafficking 2023-2027](#), pp5 & 21.

¹⁴ European Commission (2025), Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the progress made in the European Union in combating trafficking in human beings (Fifth Report), p6.

¹⁵ Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p197.

Palermo Protocol which defined child trafficking as the recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation.¹⁶

The definition of child trafficking is different to the adult definition. Trafficking of adults requires that there be an action, a means and a purpose. The means element is not required for persons under 18 years of age, in recognition of a child's incapacity to consent.¹⁷ Neither adult trafficking nor child trafficking requires 'movement'. For a child to be classed as a victim of trafficking it is sufficient that they be recruited for the purposes of exploitation.¹⁸

All children can become victims of THB, and their risk has increased in recent years due to widespread access to the internet. A 2025 report by CyberSafeKids highlights that 94% of the children surveyed aged 8 to 12 years olds have a smart device, 83% of those children used these in their bedrooms, with more than three quarters using devices without parental supervision,¹⁹ which according to the United Nations Office of Drugs and Crime increases the risk of exposure to trafficking.²⁰

The risk to children of ICT-facilitated trafficking has become a serious concern for governments and civil society organisations (CSOs), according to the Council of Europe's Group of Experts on Trafficking in Human Beings (GRETA), as the internet, social media and online games are increasingly used by traffickers to recruit, exploit and control children.²¹

¹⁶United Nations, General Assembly Resolution 55/25, 14 November 2000, [Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime \(Palermo Protocol\)](#), Article 3(a), (c)&(d).

¹⁷[ibid](#), Art 3(a) 'Trafficking in persons' shall mean the recruitment, transportation, transfer, harbouring or receipt of persons (**action**), by **means** of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the **purpose** of exploitation.....(b) The consent of a victim of trafficking in persons to the intended exploitation set forth in subparagraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used; (c) The **recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered "trafficking in persons" even if this does not involve any of the means** set forth in subparagraph (a) of this article; (d) "Child" shall mean any person under eighteen years of age.

¹⁸Organization for Security and Cooperation in Europe (2018), [Child Trafficking and Child Protection: Ensuring that Child Protection Mechanisms Protect the Rights and Meet the Needs of Child Victims of Human Trafficking](#), p19.

¹⁹CyberSafeKids (2025), [Left to their own devices: The virtually unprotected lives of kids in Ireland](#), pp4 & 11.

²⁰United Nations Office on Drugs and Crime (UNODC), [Explainer: Understanding Child Trafficking](#).

²¹Council of Europe (2020), [GRETA: Online and technology-facilitated trafficking in human beings: summary and recommendations](#), pp7 & 9.

I always liken anti-human trafficking efforts to be similar to the efforts made over the last two decades when it comes to domestic violence. I think 20 years ago in Ireland, people were like, oh, it doesn't happen here. We're not going to talk about that. We're certainly not going to acknowledge it will open up a whole can of worms. And I think that's where we're at with child criminal exploitation and with trafficking in this country. There's just this reluctance to even speak about or acknowledge that it's happening.

– Stakeholder 08

2. Research aims, objectives and methodology

This research aims to map and assess the effectiveness of the Irish State's response to child trafficking and ICT-facilitated child trafficking through desk research and stakeholder interviews. The research focused particularly on existing systems for identification, assistance and support services for child victims and children at risk of trafficking and exploitation, and on identifying and examining national or international good practice. The evaluation and key findings, which form the basis of this report, have been used to develop actionable policy, research and legislative recommendations to improve Ireland's response to child trafficking and ICT-facilitated child trafficking and to inform the Commission's future work as National Rapporteur.

The research took a mixed methods approach which involved desk research and qualitative data collection. The desk research consisted of a review of relevant Irish, EU and international legislation and policies, existing research relating to child trafficking, and country reports on Irish State commitments and obligations in relation to child trafficking. This desk research assisted with the development of 20 interview questions, which were tailored to stakeholders.

Qualitative data was collected through 16 interviews with 22 stakeholders from various public bodies and European, international and civil society organisations, working to combat THB, child trafficking and child exploitation and to support child victims and at-risk children. The 22 stakeholders consisted of 13 Irish public officials working in the civil service or for independent statutory agencies; five representatives from civil society organisations; one from a research institution; one from an international organisation; one from a regional organisation and one official from a European Union agency.

Interview questions for all stakeholders were designed to elicit their experience and knowledge of child trafficking and ICT-facilitated child trafficking, emerging areas of concern and good practice. Questions were open-ended and were loosely grouped under the four Ps – prevention, protection, prosecution and partnerships – with stakeholders encouraged to speak freely and/or to focus solely on their areas of specific expertise if they wished. Where illustrative quotes are used, they are not attributed.

Prior to commencing each interview, verbal consent was obtained for any recording and where this was consented to, stakeholders were advised that any recordings and transcripts were strictly for research purposes only and would not be shared publicly. As noted, all stakeholder responses have been anonymised in this report.

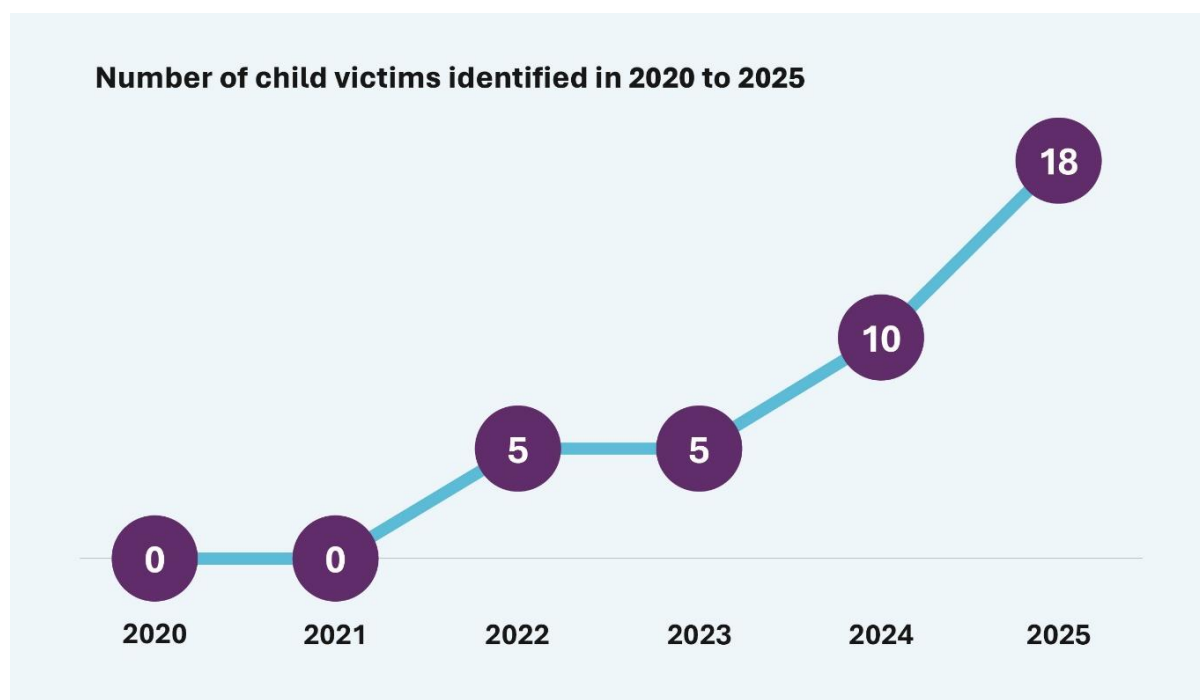
3. Child trafficking data

Inadequate data collection of the scale of THB and forms of child exploitation has been identified as an area of concern by the Commission.²²

Irish and European statistics

The Irish Human Rights and Equality Commission, the European Commission, the Council of Europe and the US Department of State TIPS reports have all flagged the low numbers of child victims identified as a key weakness in Ireland's efforts to combat and prevent child trafficking.²³

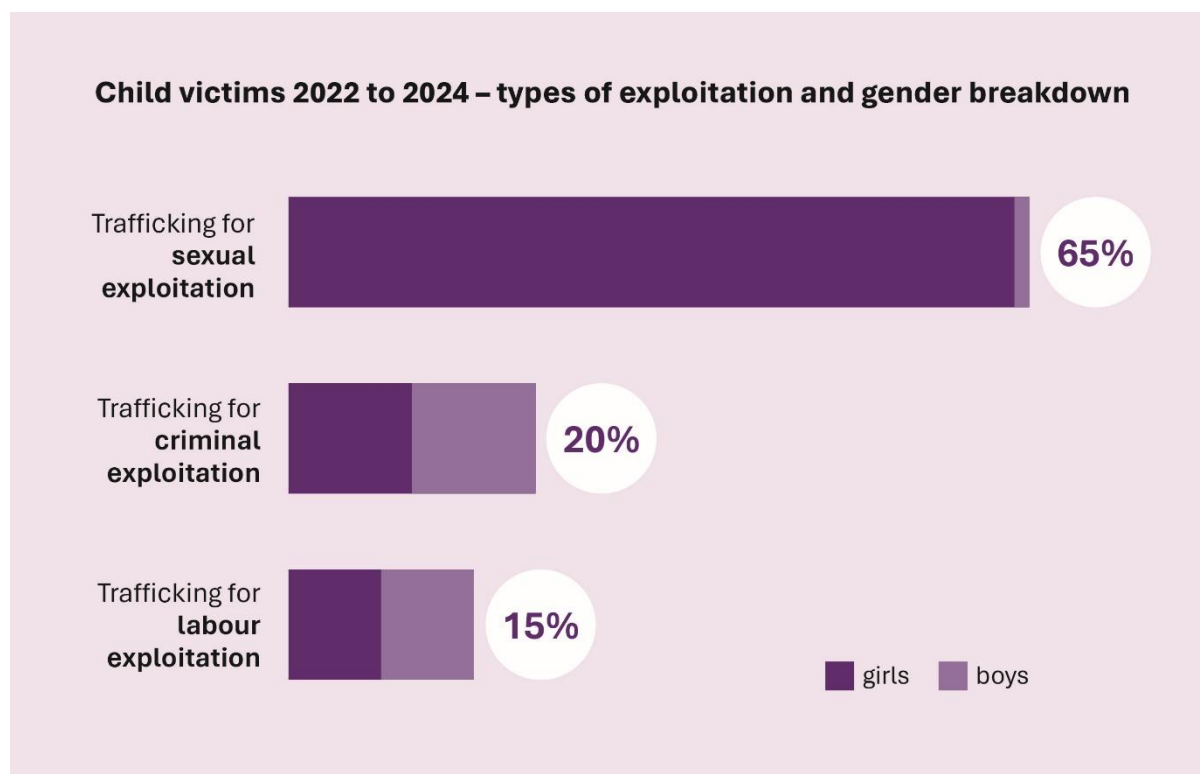
The Commission has previously noted serious concerns regarding identification and protection of child victims and children at risk in Ireland.



²²Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p191.

²³Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), pp8 & 9; European Commission (2025), [Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the progress made in the European Union in combating trafficking in human beings \(Fifth Report\)](#), p6; Council of Europe (2022), [GRETA Third Evaluation Report: Ireland](#), p5; US Department of State (2025) [2025 Trafficking in Persons Report: Ireland](#).

No child victims of THB were identified in 2020 and 2021. In 2022 and 2023, five child victims were identified each year, with 10 identified in 2024.²⁴ Of the 20 identified child victims from 2022 to 2024, 13 were cases of trafficking for sexual exploitation (TSE), the vast majority of whom were girls, less than five were trafficking for criminal activities (TCA), affecting equal numbers of boys and girls, and less than five were trafficking for labour exploitation (TLE), affecting girls slightly more than boys.²⁵



In 2025, 18 child victims were identified. No detailed breakdown of gender, nationality or exploitation type is currently available,²⁶ however, An Garda Síochána has advised that the large majority of child victims were identified via referral from the International Protection Office. They also confirmed that a lot of the child victims held the same nationality but none of them were Irish nationals, and that the types of exploitation included TSE, TLE and TCA. The 2025 figure represents an 80% increase from 2024 although from a very low base.

²⁴Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on Action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p8.

²⁵[ibid.](#)

²⁶Minister for Justice, Home Affairs and Migration, Jim O'Callaghan TD, [Parliamentary Question 745, Tuesday, 24 February 2026](#).

For the period 2022 to 2024, children accounted for just over 12% of all victims of THB identified in Ireland,²⁷ and just under 16% of all victims in 2025.²⁸ While the numbers of children identified as victims of THB has increased in recent years, the percentage, as the Commission has previously noted,²⁹ remains lower than the EU average of 19% of identified victims,³⁰ (previously almost 25%).³¹ It is also substantially lower than the United Kingdom (UK), our nearest neighbour, and another common law jurisdiction, where in 2023, 7,432 children were identified as potential victims of trafficking, 44% of all referrals to the NRM.³²

One reason suggested by the ESRI for the low numbers of child victims was the decision in 2017 of the Director of Public Prosecutions to reclassify some child victims of trafficking as child victims of sexual exploitation.³³ However, the Commission has also posited that this also contributed to how child trafficking is defined in Irish law³⁴ and has recommended that all child trafficking offences be contained in one piece of legislation.³⁵ The issues with the current identification system are also well recognised.³⁶

²⁷Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p6.

²⁸Minister for Justice, Home Affairs and Migration, Jim O'Callaghan TD, [Parliamentary Question 745, Tuesday, 24 February 2026](#).

²⁹ Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), pp402 & 403.

³⁰European Commission (2025), Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the progress made in the European Union in combating trafficking in human beings (Fifth Report), p6.

³¹European Commission (2021), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy on Combatting Trafficking in Human Beings 2021- 2025, Com (2021) 171 final (EU Strategy on Combatting Trafficking in Human Beings), para 1. The European Parliament has noted in its May 2025 Trafficking in Children Briefing that child victims accounted for almost a fifth of all registered victims in the EU (19 %), a decrease from 22 % in the 2019-2020 period and that this decrease may be a result of an increase in online sexual exploitation of children.

³²Independent Anti-Slavery Commissioner & ECPAT UK (2025), [Child Trafficking in the UK 2024: A snapshot](#), p8

³³Economic and Social Research Institute (2022), ESRI Research Series Number 139: Detection, Identification and Protection of Third-Country National Victims of Human Trafficking in Ireland, p16.

³⁴Irish Times, 22 October 2022, [Child trafficking in Ireland: 'It wasn't fair forcing me to have a baby I didn't ask for'](#).

³⁵ Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p193.

³⁶ [Department of Justice, Home Affairs and Migration](#), 30 July 2022, [Minister McEntee welcomes new legislation as she marks World Day against Trafficking in Persons](#)

Although numbers of identified child victims in Ireland are low, the gender breakdown of victims by form of THB are in line with EU data, where the majority of children, primarily girls, are victims of TSE; but girls and boys are recorded as victims of THB of all types of exploitation including TCA, and TLE.³⁷

Irish child victims

Ireland has attracted international³⁸ and national³⁹ criticism regarding its failure to identify Irish victims of THB. The Commission noted in its most recent report to GRETA that of the 10 child victims of trafficking identified in 2024, none were Irish nationals.⁴⁰ Similarly in 2025, out of the 18 child victims who were identified, none of these were Irish children.

The lack of identification of Irish children as victims of THB does not align with UK statistics where 78% of child victims are UK nationals,⁴¹ nor with EU statistics, where 81% of child victims were EU citizens with 88% suffering exploitation within their own country.⁴² The failure of Ireland to identify its own nationals as victims of THB is not unique, however. Recent research in Northern Ireland demonstrates very low numbers of Irish and UK national children identified as potential victims in Northern Ireland.⁴³

³⁷European Commission (2025), Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the progress made in the European Union in combating trafficking in human beings (Fifth Report), p6.

³⁸US Department of State (2025) [2025 Trafficking in Persons Report: Ireland](#).

³⁹MECPATHS quoted in Irish Examiner, (30 July 2024), [State failing to protect victims of child trafficking](#).

⁴⁰Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p16.

⁴¹Independent Anti-Slavery Commissioner & ECPAT UK (2025), [Child Trafficking in the UK 2024: A snapshot](#), p8.

⁴²European Commission (2025), Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the progress made in the European Union in combating trafficking in human beings (Fifth Report), p6

⁴³Kane, G. and Chisholm, A. (2025), Identifying Modern Slavery and Human Trafficking in the Context of Child Criminal Exploitation in Northern Ireland, p18.

Identification of children under the new national referral mechanism

It is expected that, if fully operationalised and resourced, the new National Referral Mechanism (NRM) will result in an increase in the overall number of identified victims of THB. The Commission has expressed concern, however, that without child-specific pathways, with clear and effective identification, protection and assistance processes, the new NRM will not greatly assist in the identification of child victims.⁴⁴ The Commission has also highlighted that an NRM is for identification, assistance and protection – whereas the Irish legislation introduced in 2024 focuses on just identification. The Commission has repeatedly called for child-specific identification, assistance and protection procedures and has consistently articulated the view that the identification and assistance of child victims merits a separate mechanism (separate protocols, processes and procedures), in light of the distinct definition of human trafficking of children enshrined in Article 2(5) and 2(6), as well as the specific obligations to assist and protect child victims included in Articles 13 to 16 of the amended Anti-Trafficking Directive.⁴⁵ The obligations to child victims will be further strengthened under the proposed new Victims Directive which will increase the rights of all victims, including children.⁴⁶

At-risk children

While all children are considered vulnerable to THB, certain cohorts are particularly at risk. The European Commission notes how children in migration, particularly unaccompanied minors, and all children living in residential and closed-type

⁴⁴Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p192, Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p176.

⁴⁵Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, (Amended EU Anti-trafficking Directive), Arts 2(5), 2(6), p13 -16.

⁴⁶European Parliament (2025), [Trafficking in Children](#), p1.

institutions, both during and after their placement, are particularly vulnerable to THB.⁴⁷

The Commission has repeatedly highlighted the risk to children living in State care in Ireland, whether migrants or Irish nationals.⁴⁸ Research by the Sexual Exploitation Research Institute (SERP) illustrates the risks to children in State residential care of becoming victims of sexual exploitation and prostitution and the organised nature of this exploitation by gangs and networks of predatory men.⁴⁹

Medical professionals working in the area of child sexual abuse are in a key position to identify children who are suspected to be victims of trafficking for sexual exploitation, including Irish national victims. The Laurels Clinic at Children's Health Ireland (CHI) is the paediatric medical service in the east of the country (covering all of Leinster as well as Cavan and Monaghan) that is available to children and young people when a concern or disclosure of child sexual abuse or sexual assault has been raised. From 2023 to 2026, the Laurels Clinic identified 24 children as potential victims of trafficking for sexual exploitation.⁵⁰

The Child Law Project, in a report covering judicial proceedings relating to children in care over the period 2021-2024, also highlighted its concerns in relation to nine suspected child victims of trafficking and exploitation noting that, in some instances there were fears that the children were being sexually or criminally exploited; that the care placements were inadequate and insufficient to address the risks; and that children had unrestricted access to their phone and the internet.⁵¹ In one case, a suspected child victim of trafficking needed to be transferred to the UK when no

⁴⁷European Commission (2021), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy on Combatting Trafficking in Human Beings 2021- 2025, Com(2021) 171 final (EU Strategy on Combatting Trafficking in Human Beings), para 5 and Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Recital 7.

⁴⁸Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p32.

⁴⁹ Canning M, Keenan M, Breslin R, (2023) [Protecting Against Predators: A Scoping Study of the Sexual Exploitation of Children and Young People in Ireland](#), pp52 & 53.

⁵⁰ The Laurels Clinic uses validated screening tools to identify victims and document their findings. An internal Laurels Clinic report, shared with IHREC in the course of this research, indicated almost all potential victims were Irish nationals and almost all were under the care of Tusla, with a history of running away from care placements for days at a time. A copy of the report was provided to the Commission and has not been published.

⁵¹Child Law Project (2025), [Falling Through the Cracks: An Analysis of Child Care Proceedings from 2021 to 2024](#), p56.

suitable accommodation was available in Ireland.⁵² The report also highlights serious concerns regarding the situation of, and care provisions for, unaccompanied minors due to the absence of any clear legal obligations on Tusla under the Child Care Act 1991.⁵³ It refers to legal proceedings relating to unaccompanied girls who arrived in Ireland fleeing forced child marriage, child victims of trafficking, and of being forced to join a militia group.⁵⁴

The European Commission details how a number of other factors increase children's risk of exploitation such as gender, poverty, social exclusion, discrimination, low education levels, membership of an ethnic minority or other marginalised group, or having a disability.⁵⁵ It also notes how any child who has access to the internet is also at an increased risk of becoming a victim of THB.⁵⁶ Although not focused solely on children's risk to THB, the Ombudsman for Children Office (OCO) commenced a Young Lives at Risk research project in 2025 which will consider children's exposure to criminal and sexual exploitation and how it intersects with a history of family breakdown and care, poverty and socio-economic status.⁵⁷

⁵²[ibid.](#)

⁵³[ibid](#) p55.

⁵⁴[ibid.](#)

⁵⁵European Commission (2021), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy on Combatting Trafficking in Human Beings 2021- 2025, Com(2021) 171 final (EU Strategy on Combatting Trafficking in Human Beings), paras 1 & 5. Regarding gender, the European Commission highlights that girls appear, in some respects, to be more vulnerable to THB than boys, given that the majority of child victims in the EU are victims of THB for sexual exploitation.

⁵⁶[ibid.](#), para 4.3.

⁵⁷Ombudsman for Children Office, [Young Lives at Risk Research Project](#) Fashioned on the UK's Commission for Young Lives project, the OCO research will focus on the experience of children as young as 10 who are exposed to family breakdown, poverty, educational exclusion, care involvement, addiction, homelessness, mental health crises and criminal and sexual exploitation. The project involves extensive consultation with children and aims to ensure successful early intervention, prevention, trauma-informed practice, and long-term, comprehensive support for at-risk children.

4. Child trafficking law and policy

The Irish State's response to child trafficking, ICT-facilitated child trafficking and the exploitation of children, is underpinned by a range of international conventions, European Union law and Irish legislation, policies and strategies.

Law

International conventions

Ireland is a signatory to a number of international and European conventions and protocols which have relevance to child trafficking. The Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children (Palermo Protocol)⁵⁸ was adopted by the UN General Assembly in 2000 to supplement the UN Convention Against Transnational Organised Crime.⁵⁹ The Palermo Protocol was the first international legally binding instrument to define THB and promote global coordination to combat THB while respecting the rights of victims.⁶⁰

The UN Convention on the Rights of the Child enshrines the principle of the best interests of the child into international law and has been ratified by Ireland. Its Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography has not yet been ratified by Ireland as of May 2026.⁶¹ At European regional level, the Council of Europe Convention on Action Against Trafficking in Human Beings contains specific provisions in relation to the protection of children and reducing their vulnerability to THB; special identification and protection measures for children and unaccompanied children including a presumption of minority; commitments to acting in the best interests of the child, protecting children's identity; provides a right to access education, accommodation and healthcare; and for

⁵⁸United Nations, General Assembly Resolution 55/25, 14 November 2000, [Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime](#) (Palermo Protocol).

⁵⁹United Nations, General Assembly Resolution 55/25, 8 January 2001, [United Nations Convention Against Transnational Organized Crime](#).

⁶⁰United Nations Office on Drugs and Crime, [Organized Crime](#).

⁶¹United Nations, General Assembly, Resolution 44/25, 20 November 1989, [UN Convention on Rights of the Child](#), Article 3 and United Nations, General Assembly, 25 May 2000 [Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography](#); [Ratification Status for Ireland](#).

trafficking offences against a child to be considered aggravating circumstances in prosecutions and sentencing.⁶²

Ireland is also a party to the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention).⁶³ Ireland has signed but not yet fully ratified⁶⁴ the Council of Europe Convention on Cybercrime (Budapest Convention) which aims to improve international criminal cooperation between States and private industry against cybercrime⁶⁵ which includes ICT-facilitated trafficking.

European Union law

Directive 2011/36/EU⁶⁶ was previously the main EU legal instrument to address THB which the Commission considered in its First and Second Evaluation Reports.⁶⁷ In June 2024, this Directive was amended by Directive (EU) 2024/1712 (amended Directive)⁶⁸ which Ireland was due to transpose by 15 July 2026. The provisions of particular relevance to child trafficking and ICT-facilitated trafficking are outlined below.

The definition of child trafficking in the amended Directive, adopted from the Palermo Protocol, remains unchanged; however, new THB offences of surrogacy, forced marriage and illegal adoption are included.⁶⁹

⁶²Council of Europe, European Treaty Series, No. 197, 16 May 2005, [Convention on Action Against Trafficking in Human Beings](#), Arts 5(3), 5(5), 10(1), 10(3), 11(2), 12(7) 24, 28(3).

⁶³Council of Europe, European Treaty Series, No 201, 25 October 2007, [Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse](#) (Lanzarote Convention).

⁶⁴Minister for Justice, Home Affairs and Migration, Jim O'Callaghan TD, [Parliamentary Question 684, Tuesday, 3 March 2026](#).

⁶⁵Council of Europe, European Treaty Series No.185, 23 November 2001, [Convention on Cybercrime \(Budapest Convention\)](#), Preamble.

⁶⁶Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims and replacing Council Framework Decision 2002/629/JHAT (EU Anti-Trafficking Directive).

⁶⁷Irish Human Rights and Equality Commission (2022), [Trafficking in Human Beings in Ireland Evaluation of the Implementation of the EU Anti-Trafficking Directive](#) and Irish Human Rights and Equality Commission (2023), [Trafficking in Human Beings in Ireland Second Evaluation of the Implementation of the EU Anti-Trafficking Directive](#).

⁶⁸Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims and replacing Council Framework Decision 2002/629/JHAT (EU Anti-Trafficking Directive).

⁶⁹Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims (Amended EU Anti-Trafficking Directive), Arts 2(1), 2(3), 2(5) & 2(6).

The amended Directive aligns with the Victims Directive⁷⁰ and Charter of Fundamental Rights,⁷¹ requiring that Member States ensure that the best interests of the child is a primary consideration, and that a victim-centred approach is adopted with children treated as full rightsholders.⁷² It provides for children's perspectives and capacity to be taken into account and prescribes child-friendly prevention measures, child-sensitive investigations and prosecutions and that protection supports like accommodation be safe, appropriate and equipped to accommodate the specific needs of children.⁷³

The amended Directive contains new provisions in relation to the identification of and assistance to victims, and NRMs. NRMs must be placed on an administrative or statutory footing and Member States must establish minimum standards for the early detection of victims and a cross-border referral focal point.⁷⁴ International protection applications can be progressed in tandem with entry into an NRM.⁷⁵ All presumed and identified child victims must be provided with specialised assistance including appropriate accommodation.⁷⁶ To better detect and identify victims, Member States must promote or provide specialised, human rights-based and child-sensitive training for frontline professionals including prosecutors and the judiciary.⁷⁷ The European Commission's Anti-Human Trafficking Hub have produced two studies on NRMs⁷⁸ to assist Member States in their implementation.

With regard to the prevention of ICT-facilitated trafficking, Member States should conduct education, training and awareness-raising campaigns, with a specific focus on the online dimension of THB, to reduce demand and should promote digital skills to

⁷⁰Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA (Victims 'Directive).

⁷¹[Charter of Fundamental Rights of the European Union, \(2000/C 364/01\)](#) in which Art 5(3) contains an express prohibition on THB.

⁷²Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims (Amended EU Anti-Trafficking Directive) Recital 17.

⁷³[ibid](#), Arts 1(3), 11(1), 13(3), 11(5a), 12 & 18(2).

⁷⁴[ibid](#), Arts 11 (1), (2), (3) & (4).

⁷⁵[ibid](#), Arts 11(1).

⁷⁶[ibid](#), Arts 11(4), 11(5a) & 11a (2).

⁷⁷[ibid](#), Art 18b (1) & (2)).

⁷⁸ EU Commission Anti-Trafficking Hub.

(27 January 2026) Rapid Response Study on National Referral Mechanisms and related focal points

(27 May 2026) National Referral Mechanisms (NRMs) in the EU: Mapping, Analysis and Further Guidance.

reduce the risk to vulnerable groups such as children.⁷⁹ From a criminal justice perspective, Member States must ensure that investigators and prosecutors have appropriate skills and expertise to examine ICT-facilitated THB crimes and should consider creating specialised units.⁸⁰ At sentencing, the use of ICT to distribute sexual images should be considered an aggravating factor.⁸¹ There are new provisions in relation to the liability of, and sanctions for, legal persons which will also apply to ICT companies.⁸²

The Directive contains four articles which relate expressly to children. Article 13 outlines the general principles for responses to child victims including the presumption of minority⁸³ and the provision of assistance, protection and support.⁸⁴ Individual assessments must be undertaken to determine assistance and support which must take into account a child's special circumstances, their views and needs, to secure long-term solutions and their safe transition into adulthood.⁸⁵ Supports should also include support to the child victim's family.⁸⁶

For children with no parents or inadequate parental support, a guardian must be appointed as soon as a child victim has been identified and a new guardian can be appointed if a conflict of interest arises.⁸⁷ To enhance protections during the criminal justice process, child victims are entitled to early and free legal counselling and representation, anonymity and child-specific measures during interview and at trial.⁸⁸

⁷⁹[ibid](#), Art 18(1) & 18a.

⁸⁰[ibid](#), Art 9(3).

⁸¹[ibid](#), Art 4(2)(a) & (d) & 4(3)(b).

⁸²[ibid](#), Arts 5 & 6.

⁸³The presumption of minority was outlined in Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims, and replacing Council Framework Decision 2002/629/JHAT Recital 22 notes that 'Where the age of a person subject to trafficking is uncertain, and there are reasons to believe it is less than 18 years, that person should be presumed to be a child and receive immediate assistance, support and protection' noting that all Member States should ensure that 'specific assistance, support and protective measures are available to child victims' and that 'such measures should be provided in the best interests of the child and in accordance with the 1989 United Nations Convention on the Rights of the Child'.

⁸⁴ Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Art 13(1) & (2) (Amended EU Anti-Trafficking Directive).

⁸⁵[ibid](#), Art 14(1).

⁸⁶[ibid](#), Art 14(3).

⁸⁷[ibid](#), Art 14(2).

⁸⁸[ibid](#), Art 15(1)-(5) Access to legal counselling and representation should be 'without delay' which would suggest that this be provided as soon as possible after a child has been identified as a potential victim of

Article 16 provides additional protections for unaccompanied minors, a particularly vulnerable group.⁸⁹

Other provisions of general relevance to child trafficking, include that Member States: apply the non-punishment principle to victims who may have been forced to commit criminal or unlawful acts as a result of their exploitation; criminalise persons who knowingly use the services of a victim of THB; allow for extra-territorial prosecutions; and consider establishing a national compensation fund for THB victims.⁹⁰

Irish legislation

Ireland has a range of legislation relating to THB and child exploitation, child protection and child victims.

The Criminal Law (Human Trafficking) Act 2008 criminalises trafficking for labour exploitation (TLE) and organ removal; the trafficking of adults for sexual exploitation (TSE) and amends the Child Trafficking and Pornography Act 1998⁹¹ provisions relating to child TSE, TLE or organ removal.⁹²

The Criminal Law (Human Trafficking) (Amendment) Act 2013 expands the forms of exploitation to include trafficking for criminal activities (TCA) and forced begging.⁹³ It amends the Criminal Evidence Act 1992⁹⁴ to allow for pre-recorded video evidence for all under 18s to be used in court.⁹⁵ The Criminal Justice (Public Order) Act 2011 criminalises organised begging.⁹⁶

The Domestic Violence Act 2018 creates the offence of forced marriage.⁹⁷ The offence of trafficking for forced marriage is expected to be transposed into national law separately, in line with the amended Directive.⁹⁸

THB in keeping with Directive's provisions related to early and proactive identification of child victims under Art 11.

⁸⁹[ibid](#), Art 16.

⁹⁰[ibid](#), Arts 8, 10, 17 & 18a (1).

⁹¹[Child Trafficking and Pornography Act 1998](#), s3.

⁹²[Criminal Law \(Human Trafficking\) Act 2008](#), s1-4.

⁹³[Criminal Law \(Human Trafficking\) \(Amendment\) Act 2013](#), s1.

⁹⁴[Criminal Evidence Act 1992](#).

⁹⁵[Criminal Law \(Human Trafficking\) \(Amendment\) Act 2013](#), s4.

⁹⁶[Criminal Law \(Public Order\) Act 2011](#), s5.

⁹⁷[Domestic Violence Act 2018](#), s38.

⁹⁸[Criminal Law \(Sexual Offences, Domestic Violence and International Instruments\) Bill 2025, General Scheme](#).

The Criminal Law (Sexual Offences and Human Trafficking) Act 2024 provided for a new statutory NRM but the relevant Part has not yet been commenced as of June 2026.⁹⁹ It provides the legal basis for the new Operational Committee which will comprise Competent Authorities (Government departments, state agencies and independent statutory agencies) and Trusted Partners (CSOs). Its functions will include the identification of victims and the provision of assistance and services to presumed and identified victims of THB.¹⁰⁰ The Committee must develop Operational Guidelines which will include child-specific procedures.¹⁰¹

Other relevant legislation includes:

- The Criminal Justice (Engagement of Children in Criminal Activity) Act 2024 criminalises the coercion or attempted coercion of children to engage in crime.¹⁰² The Health (Assisted Human Reproduction) Act 2024 bans the provision of assisted human reproduction treatment to any child.¹⁰³
- The Child Trafficking and Child Pornography Act 1998, as amended by the Criminal Law (Sexual Offences) Act 2017, contains offences in relation to the sexual exploitation of children and using ICT to facilitate exploitation.¹⁰⁴ The State have proposed a further amendment to the Act which would replace references to ‘child pornography’ to ‘child sexual abuse material’ and ‘pornographic performance’ to ‘child sexual abuse performance’.¹⁰⁵
- The Online Safety and Media Regulation Act 2022, compels the regulator, Coimisiún na Meán, to have regard for the protection of, and harm to, children when specifying harmful online content.¹⁰⁶
- The Digital Safety Act (DSA) is a set of EU rules that are applicable in Ireland, regulating online services with the main goal to create a safer digital space.¹⁰⁷

⁹⁹ [Criminal Law \(Sexual Offences and Human Trafficking\) Act 2024](#), Part 3.

¹⁰⁰ [Criminal Law \(Sexual Offences and Human Trafficking\) Act 2024](#), Part 3, s,20, 21, s22 & s23.

¹⁰¹ [Ibid](#), Part 3, s23(1)(c)(iv).

¹⁰² [Criminal Justice \(Engagement of Children in Criminal Activity\) Act 2024](#).

¹⁰³ [Health \(Assisted Human Reproduction Act\) 2024](#), s16.

¹⁰⁴ [Criminal Law \(Sexual Offences\) Act 2017](#), s8.

¹⁰⁵ [Criminal Law \(Sexual Offences, Domestic Violence and International Instruments\) Bill 2025, General Scheme](#), Head 12.

¹⁰⁶ [Online Safety and Media Regulation Act 2022](#), s139B(4)(c) &5(c).

¹⁰⁷ European Commission (22 September 2025) [The Digital Services Act: keeping us safe online](#)

Accompanying guidance regarding the protection of children under the Act has also been published by the European Commission.¹⁰⁸

- The Children First Act 2015, and its accompanying national guidance (which is currently under review)¹⁰⁹ contains child protection provisions in relation to Tusla, the Child and Family Agency, and other service providers, including to act in the best interests of the child; undertake risk assessments and produce safeguarding statements; mandatory reporting; and to safeguard children from harm which is defined as ill-treatment affecting health, welfare or development and sexual abuse.¹¹⁰
- The Child Care Act 1991 provides for children in State care and requires that child welfare is paramount, that children's views be considered in decision-making and for making emergency care, interim care, care and supervision orders.¹¹¹
- International Protection Act 2026 which implements the EU Pact on Migration and Asylum¹¹² has introduced changes in how unaccompanied minors are treated on arrival in Ireland including in relation to age assessment procedures.¹¹³
- Proposed legislation in the area of child protection includes the Child Care (Amendment) Bill 2025.¹¹⁴
- The Criminal Justice (Victims of Crime) Act 2017 which establishes minimum standards on the rights, support and protection of victims of crime¹¹⁵ has some special provisions for children. These include the assumption that all children have protection needs and the need to assess the benefit of special measures; the requirement to operate in the best interests of the child taking into account their views and those of parents/guardians; and the presumption of minority.¹¹⁶ It

¹⁰⁸ European Commission (14 July 2025) '[Guidelines on the protection of minors under the DSA to ensure a safe online experience for children and young people.](#)'

¹⁰⁹ Source: Tusla 2026.

¹¹⁰ [Children First Act 2015](#), s2, s7, s10, s11 & s14.

¹¹¹ [Child Care Act 1991](#), s13, s17-19 & s24.

¹¹² [EU Pact on Migration and Asylum](#).

¹¹³ [International Protection Act 2026](#).

¹¹⁴ [Child Care \(Amendment\) Bill 2025](#).

¹¹⁵ [Criminal Justice \(Victims of Crime\) Act 2017](#).

¹¹⁶ [ibid](#), s15(7).

provides for children without a parent or guardian to be accompanied during criminal proceedings by an appropriate person and notes the need to prevent secondary victimisation.¹¹⁷

- Section 42 of the Irish Human Rights and Equality Commission Act 2014 establishes that public bodies, in the performance of their functions, are required to have regard to the need to eliminate discrimination; promote equality of opportunity and treatment of its staff and the persons to whom it provides services; and to protect the human rights of members, staff and persons to whom they provide services.¹¹⁸

Legal definition of child trafficking

Child trafficking is defined as the:

“recruitment, transportation, harbouring or receipt of a child for the purposes of exploitation.”¹¹⁹

Despite the addition of different forms of exploitation to international, European Union and Irish law, the basic legal definition of child trafficking remains the same, requiring an action and an exploitative purpose only.

The OSCE makes a number of important points regarding child trafficking. It notes that, although child trafficking does not require a means element (such as threats, coercion, violence, abduction or deception, which is necessary for an adult to be considered a victim of trafficking),¹²⁰ child victims may often experience these things. It also clarifies that child trafficking does not require any form of movement, whether internal in a country or cross-border travel and it is sufficient that a child has been recruited for the purposes of exploitation.¹²¹ The exploitation element, or intention to exploit, must be

¹¹⁷[ibid](#), s18(1) & (2) and s34(1).

¹¹⁸ [Irish Human Rights and Equality Commission Act 2014, s. 42\(1\)](#)

IHREC Website [Public Sector Equality and Human Rights Duty](#).

¹¹⁹United Nations, General Assembly Resolution 55/25, 14 November 2000, [Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime \(Palermo Protocol\)](#), Article 3(c).

¹²⁰Organization for Security and Cooperation in Europe (2018), [Child Trafficking and Child Protection: Ensuring that Child Protection Mechanisms Protect the Rights and Meet the Needs of Child Victims of Human Trafficking](#), p. 19.

¹²¹[ibid](#).

present, notes the OSCE, simply recruiting or transporting children does not constitute child trafficking, nor are migrant children, who travel to seek to earn a living, victims of trafficking,¹²² however they may still require special attention and possibly assistance to mitigate the risk of exploitation.

Policies, strategies and action plans

European strategies

The EU Strategy on Combatting Trafficking in Human Beings 2021-2025¹²³ informs the EU response to THB and is linked to the EU Strategy on Organised Crime 2021-2025.¹²⁴

The Strategy outlines a range of key actions for the EU and Member States to progress to improve prevention, protection and prosecution of THB, which is a priority for the EU.¹²⁵

It notes the key role that legislation plays in coordinating the EU wide response and highlights how, despite progress, measures to prevent child trafficking and support child victims are still inadequate.¹²⁶ It notes that measures must take into account the special protection needs of children,¹²⁷ in line with the EU Strategy on Victims' Rights (2020-2025)¹²⁸ and Strategy on the Rights of the Child.¹²⁹

The new EU strategy on combatting trafficking in human beings 2026-2030 is scheduled to be launched in October 2026.

¹²²[ibid.](#)

¹²³European Commission (2021), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy on Combatting Trafficking in Human Beings 2021- 2025, COM(2021) 171 final (EU Strategy on Combating Trafficking in Human Beings). The next Strategy is currently being prepared and expected to be finalised in late 2026.

¹²⁴European Commission (2021), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy to Tackle Organised Crime 2021-2025, COM (2021) 170 final (EU Strategy to Tackle Organised Crime 2021-2025).

¹²⁵European Commission (2021), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy on Combatting Trafficking in Human Beings 2021- 2025, COM(2021) 171 final (EU Strategy on Combating Trafficking in Human Beings).

¹²⁶[ibid](#), paras 1, 2 & 5.

¹²⁷[ibid](#), paras 2 & 5.

¹²⁸European Commission (2020) [Commission Communication on the EU Strategy on Victims' Rights \(2020-2025\), COM \(2020\) 258 final](#) (EU Strategy on Victims' Rights).

¹²⁹European Commission (2021), [Commission Communication on the EU Strategy on the rights of the child, COM \(2021\) 142 final](#).

Irish strategies, plans, guidelines and codes

The National Action Plan to Prevent and Combat Human Trafficking 2023-2027 (NAP) is the third plan that the State has published to inform the national THB response.¹³⁰ The NAP commits to keeping a number of measures relating to THB and child trafficking under continuous review,¹³¹ for the Department of Justice, Home Affairs and Migration to conduct a mid-term evaluation of the plan by the end of 2025, and to update it if necessary, and for an external final review to be commenced by quarter 2 of 2027.¹³² Despite these commitments, the Commission has consistently expressed concern over a lack of clarity around implementation, monitoring, and review mechanisms.¹³³ The Commission has also raised concerns regarding the National Coordinator not convening the Human Trafficking Stakeholders Forum¹³⁴ in 2025, a group which includes the National Rapporteur and CSOs.¹³⁵

The NAP aims to complement the new NRM and contains a number of child-specific measures to support prevention and prosecutions of child trafficking and the protection of child victims, a stated Government priority.¹³⁶

The new statutory NRM will replace the current system which is reportedly underpinned by guidance, administrative arrangements, and operational procedures including the 2015 Guidance and Procedures for Assisting Victims of Human Trafficking.¹³⁷ The

¹³⁰Irish Government (2023), [Third National Action Plan to Combat and Prevent Human Trafficking 2023-2027](#), pp5 & 21.

¹³¹[Ibid](#) e.g. p20 to keep the resources for An Garda Síochána's response to THB under review and p21 which contains commitments in relation to child victims of trafficking - a commitment to review the arrangements between Tusla and An Garda Síochána to provide for an enhanced response and of the protocols in place for when a child goes missing from State care.

¹³²Department of Justice, Home Affairs and Migration (2023), [Third National Action Plan to Combat and Prevent Human Trafficking 2023-2027](#), p21.

¹³³Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), pp199 & 200.

¹³⁴In 2020, the Department of Justice (National Coordinator) established a [Human Trafficking Stakeholders Forum](#) which includes justice sector actors, including other government departments and agencies, and civil society to consider policies, programmes and initiatives in relation to human trafficking and to produce joined-up and complementary actions to identify trafficking, prosecute the perpetrators and provide care to victims.

¹³⁵[Ibid](#).

¹³⁶Department of Justice, Home Affairs and Migration (2023), [Third National Action Plan to Combat and Prevent Human Trafficking 2023-2027](#), pp3 & 21.

¹³⁷Department of Justice, Home Affairs and Migration (2015), [Guidance and Procedures for Assisting Victims of Human Trafficking](#).

Administrative Immigration Arrangements for the Protection of Victims of Trafficking (AIA) is the current administrative document for foreign national victims of THB, including children, in need of immigration provisions and provides guidance on immigration permissions, makes provision for temporary residence permissions and a 60-day rest and recovery period, which can be extended for child victims.¹³⁸ The sole authority for the formal identification of victims of THB rests with An Garda Síochána.¹³⁹ Other key national policies and procedures which inform elements of the response to child trafficking victims are: the Children First Guidance¹⁴⁰ which supports the Children First Act 2015; the Victim's Charter¹⁴¹ and Supporting a Victim's Journey,¹⁴² which relates to victims and vulnerable witnesses in sexual violence cases, which complement the Criminal Justice (Victims of Crime) Act 2017; and Tusla's National After Care Policy which details procedures for children who are exiting State care.¹⁴³ Tusla also operates a Joint Working Protocol with An Garda Síochána, under Children First, which established procedures for notification by Tusla to An Garda Síochána of suspected child welfare and protection concerns¹⁴⁴ and a Child Sexual Exploitation Procedure 'Operation Cosnaím' which includes an e-learning course to assist all Tusla social workers, care workers and carers in recognising child sexual exploitation, which is currently under review pending finalisation of the NRM Operational Guidelines.¹⁴⁵ Coimisiún na Meán has published an Online Safety Code,¹⁴⁶ which relates to video sharing platforms, as part of its online Safety Framework, which supports the Regulator in its duty to protect the public, in particular, children from harmful online content and online exploitation and abuse.

¹³⁸Department of Justice, Home Affairs and Migration (2011) [Administrative Immigration Arrangements for the Protection of Victims of Trafficking](#), paras 1, 10 and 11.

¹³⁹[Ibid](#), paras 1 and 10.

¹⁴⁰Department of Children and Youth Affairs (2017), [Children First: National Guidance for the Protection and Welfare of Children](#).

¹⁴¹Department of Justice and Equality (2017) [Victims' Charter](#).

¹⁴²Department of Justice and Equality (2020) [Supporting a Victim's Journey](#).

¹⁴³Tusla (2017) [National Aftercare Policy for Alternative Care](#).

¹⁴⁴[Joint Working Protocol for An Garda Síochána/Tusla](#).

¹⁴⁵Minister for Children, Equality, Disability, Integration and Youth, Norma Foley TD, [Parliamentary Question 554, 11 February 2025](#).

¹⁴⁶Coimisiún na Meán (2024), [Online Safety Code](#).

5. Ireland's response to child trafficking and ICT-facilitated child trafficking

International good practice in combatting THB should address prevention, protection, prosecution and partnerships.¹⁴⁷ This approach has been used to structure efforts under the NAP.¹⁴⁸ It is applied to the findings and recommendations here such that the responses to child trafficking are considered with reference to prevention, protection, prosecution and partnerships.

Prevention

Training

The European Commission identifies training as a key area of action in which investment is required to address THB.¹⁴⁹ All stakeholders referenced the need for training in their interviews. Training, they felt, was inextricably linked to awareness raising, and should be provided to any public and private professionals working with children, and parents and children themselves. Stakeholders suggested that training should be somewhat tailored to the trainees and range from general and basic training on child trafficking indicators and the risks to children, to more specialised training for those professionals whose role it is to work with and support child victims of trafficking and exploitation and at-risk children.

Training to improve identification

All stakeholders interviewed highlighted how training would help professionals to view situations through a trafficking lens and is therefore linked to improved identification of child victims and that this capacity building would be key to the success of the new NRM. One stakeholder suggested the establishment of a Training Sub-Committee under

¹⁴⁷International Organization for Migration, [Prevention of Trafficking in Persons](#).

¹⁴⁸Department of Justice, Home Affairs and Migration (2023), [Third National Action Plan to Combat and Prevent Human Trafficking 2023-2027](#).

¹⁴⁹European Commission (2021), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy on Combatting Trafficking in Human Beings 2021- 2025, COM(2021) 171 final (EU Strategy on Combating Trafficking in Human Beings), para 4.2.

the new NRM as a way to strategically coordinate and standardise training efforts for Competent Authorities and Trusted Partners and to steer more general national training efforts for persons in contact with children including youth and community groups.

When the identification piece moves to a wider range of people, there's the risk that there won't be complete engagement from those stakeholders. It depends on training and resourcing.

– Stakeholder 16

The new panel that's going to make up these people assessing, are they going to be trained? Like, it's one thing to tick boxes and say they meet the threshold of the Delphi indicators but a more knowledgeable person with correct training might ask other questions.

– Stakeholder 22

Specialised ICT training for law enforcement

Under the amended Directive training must be provided or facilitated by Member States to build the specialised capacity of police, prosecutors and the judiciary.¹⁵⁰ The US Department of State highlights the increased use of ICT by traffickers and the need for law enforcement training on digital tools.¹⁵¹

Training could include, for example, training on the elements of THB, different forms of exploitation, investigative and prosecutorial skills, transnational cooperation, and the use of ICT in THB. A number of stakeholders strongly advocated for increased investment in training for all professionals involved in investigations and prosecutions into THB, particularly the need to build ICT skills capacity and learn from good practice in other jurisdictions.

We've been taking the UK experience and asking them to join us on those trainings to show how they've prosecuted. We're trying to focus on advanced technologies and building capacity, particularly of investigators in how to collect

¹⁵⁰Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, s18b.

¹⁵¹US Department of State (2024) [2024 Trafficking in Persons Report](#), p13.

digital evidence, what to look for, how to safeguard the victims, how to identify them, how to investigate technology-facilitated trafficking.

– Stakeholder 10

Training for all police on human trafficking indicators

The European Commission notes that training for police should extend to police with other specialisms to ensure early detection of child victims.¹⁵² This view was shared by law enforcement and other stakeholders interviewed as important to ensure the correct investigative approach.

Awareness and training is a key piece, it's not that easy, not every guard is a good investigator, not every prosecutor is a good prosecutor. I think a lot don't realise or understand the human trafficking legislation.

– Stakeholder 22

Sometimes it can be difficult enough to get some guards who come across cases and don't see the exploitation element. That could be a training gap, actually, and it attracts a different level of investigation.

– Stakeholder 11

Training for the judiciary

The US Department of State acknowledges recent improvements in training criminal justice frontline professionals and new Garda recruits but notes that any training undertaken did not include the judiciary.¹⁵³ The Commission noted in its most recent report to GRETA that while members of the judiciary have received training on avoidance of the re-traumatisation of vulnerable witnesses and coercive control, no information was available on general or specialised THB training for the judiciary or

¹⁵²European Commission (2021), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy on Combatting Trafficking in Human Beings 2021- 2025, COM(2021) 171 final (EU Strategy on Combatting Trafficking in Human Beings), para 4.2.

¹⁵³US Department of State (2024) [2024 Trafficking in Persons Report](#), p13.

other criminal justice professionals such as prosecutors.¹⁵⁴ Stakeholders with experience of the trial process stressed the importance of training of judges, prosecutors and the defence, noting that online training for judges and prosecutors in the EU was available from the European Judicial Training Network.

The European Judicial Training Network has great training courses online and everybody gets to learn from each other's systems. Prosecutors and judges should take that up more. I think judges need more awareness of child-specific trafficking indicators and training, not just in dealing with children, but also court rules, and laying down court rules, and dealing with difficult defence.

– Stakeholder 13

Training for legal professionals to identify trends and patterns

Some of these stakeholders also noted how appropriate training for legal professionals, including internal information sharing with colleagues whose focus is not on trafficking, raises awareness and can help professionals to recognise trends and patterns in child trafficking.

The key is training for prosecutors and judicial authorities on recognising patterns in case files.

– Stakeholder 13

It's something that we've raised in internal training with colleagues in other departments as well to see if they encounter those kinds of patterns.

– Stakeholder 09

Training for any professionals working with children

GRETA notes that for frontline service providers, such as social workers, education and healthcare professionals, who may encounter child victims, training should ensure

¹⁵⁴ Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), pp132 & 133.

awareness of the special vulnerabilities of child victims and incorporate information on children's rights and specific protection needs during the criminal process.¹⁵⁵

The Commission noted in its most recent report to GRETA, that there have been substantial efforts in recent years by Tusla, in collaboration with a child trafficking specialist CSO, MECPATHS, to train Tusla child protection practitioners, including the Separated Children Seeking International Protection team (SCSIP), and private providers in relation to child trafficking.¹⁵⁶ These training efforts by Tusla were commended by a number of stakeholders from the public and CSO sector, however many also stressed the remaining training need, and the need for training to remain a priority and focus. Tusla staff are also now being trained with Garda members on child specialist interviewing, seen by many stakeholders as key to dealing with child victims, even outside of the formal investigative process.

Tusla are incredibly important as they are in a key position to engage with children at an early stage. They have been building up more training models, they're very active but there is still more work to do in that area.

– Stakeholder 01

The need for cross- and multisectoral training on child trafficking indicators and scenario-based training for those dealing with at-risk children and child victims, was mentioned by stakeholders as integral in prevention efforts. It was viewed as particularly important to recognise child criminal exploitation and child trafficking for criminal activities.

They could do some child trafficking indicators and scenario-based training or something with judges, prosecutors, police, child protection NGOs and other professionals. That kind of training would be a good thing.

– Stakeholder 13

¹⁵⁵[ibid.](#)

¹⁵⁶Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), pp30 & 31.

The need for cross-sectoral training and awareness is so essential, because ideally that child needs to be picked up by social services, youth workers, people in the community, teachers, whoever it might be before they reach the point where the police arrest them.

– Stakeholder 03

Awareness raising

The NAP includes a commitment to keep Government websites up to date and to fund awareness raising campaigns for the public and hard to reach victims and communities. However, it contains no specific commitment to deliver such campaigns in relation to child trafficking or ICT-facilitated child trafficking.¹⁵⁷

Digital literacy campaigns

Under the amended Directive, Member States are obliged to take appropriate measures such as education programmes and awareness-raising campaigns, in a child-friendly and gender-sensitive way, to reduce the risk of THB.¹⁵⁸ Campaigns and programmes should encompass digital literacy skills and be conducted in conjunction with CSOs and the private sector.¹⁵⁹ The OSCE suggests that one way to counteract this danger is to provide children with digital skills and educate their parents regarding the dangers of unsupervised internet access. Public education initiatives, according to the OSCE, should focus on prevention and demand reduction and include information on trafficking indicators, the risks that platforms pose in facilitating THB, and the grooming and recruitment of children.¹⁶⁰ The Commission has previously recommended such public education initiatives.¹⁶¹

¹⁵⁷Department of Justice, Home Affairs and Migration (2023), [Third National Action Plan to Combat and Prevent Human Trafficking 2023-2027](#), Actions 1.1, 1.2 & 1.3.

¹⁵⁸Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, s18(2).

¹⁵⁹[Ibid.](#)

¹⁶⁰Organization for Security and Co-operation Organization for Security and Co-operation in Europe (2020), [Leveraging Innovation to Fight Trafficking in Human Beings: A Comprehensive Analysis of Technology Tools](#), p14.

¹⁶¹Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human](#)

Digital literacy and online safety in schools

Many stakeholders noted the roles of schools in awareness-raising initiatives regarding child trafficking and online safety. The need for stronger digital and media literacy is a key concern. As one stakeholder noted, all children, regardless of their background, migration and socio-economic status, need to be equipped to navigate an increasingly online world and parents need to be aware of the risks to their children of being online, particularly if this is unsupervised. Sustained investment and strong nationwide campaigns are needed.

If they're being recruited on those games or online, it's usually done behind closed doors. If you give your child access to the internet, you give the internet access to your child.

– Stakeholder 06

There was particularly strong support from CSOs who deliver training, and public sector professionals working with children, for awareness-raising initiatives around child trafficking and the online exploitation of children, for children, parents and teachers. The recent announcement that online safety modules, co-developed by Coimisiún na Meán and the Department of Education and Skills, are to be included in the primary school curriculum has been welcomed, but more remains to be done.¹⁶² Many spoke about embedding digital literacy and critical thinking into the education curriculum with one highlighting good practice in Finland in this regard.

What we're saying to the Government is that they should be embedding this into the curriculum. Fostering critical thinking skills across the board is vitally important for children growing up in the digital age.

– Stakeholder 02

[Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p96.

¹⁶²RTÉ News, 5 March 2026, [New online safety programme launched for primary school pupils](#).

I've said it to the Minister for Education, we are way behind in terms of educating our children. One thing I was speaking about is the Finnish model of education. From primary school they teach them about critical analysis thinking, misinformation, how to spot it. We're very slow and it'll take time. We'll have to train the teachers, develop the teacher training, then the curriculum, but it should be on the radar.

– Stakeholder 17

International good practice – Finnish online media safety curriculum

In 2014, Finland incorporated online media safety into its national education system with digital and media literacy, ICT competence, online safety and critical thinking embedded as transversal competencies into the Finnish National Core Curriculum for primary and secondary schools.¹⁶³ The policy aims to ensure that all citizens including children develop resilience and strong media literacy skills to assess online content. In 2020 the 'New Literacies' development programme extended online safety education to children in early childhood education and care to improve digital safety and media understanding for very young children and to teach them responsible online behaviour.¹⁶⁴ More recently, children in Finnish schools have started learning about AI and disinformation including how to recognise AI-generated or manipulated images, videos and other content.¹⁶⁵ Although not specifically designed to raise awareness of human trafficking, by embedding strong online safety and digital literacy from a very young age, this curriculum should help reduce children's vulnerability to online exploitation. Indeed the Council of Europe and ECPAT note how in a survey of children 1,762 children aged 11 to 17, conducted by Save the Children Finland in 2021, 72% of children reported that they would be able to identify an offender trying to groom them online, such as receiving sexualised comments or requests for nude photos.¹⁶⁶

¹⁶³Finnish National Agency for Education, [National Core Curriculum Primary and Lower Secondary Basic Education](#).

¹⁶⁴Finnish Arts and Culture Agency, [New Literacies Development Programme](#).

¹⁶⁵Euronews, 5 January 2026, [After Decades of Teaching Media Literacy Finland Equips Students with Skills to Spot Ai Deepfakes](#).

¹⁶⁶Council of Europe & ECPAT International (2023) [Country Overview Finland - Ending Child Sexual Abuse and Exploitation: State of Play in light of the Lanzarote Convention](#), p11.

Awareness raising in communities

Stakeholders believed that schools were a good location to deliver training on child trafficking and child exploitation but that such training should also be given by trafficking and child trafficking specialists in youth and community settings. Some stakeholders noted how members of An Garda Síochána Human Trafficking Investigation and Coordination Unit were very involved in raising community awareness but did not have the resources to deliver training in every community. A number of stakeholders highlighted how they were involved in community awareness raising initiatives. Others spoke about how they felt that not enough was being done to educate young children to reduce their risk of exploitation.

You need to be talking about these issues in secondary schools and in community and youth centres. It's a societal problem. There are experts within the community that can be empowered, that can be funded. Everybody needs to be on board when we are talking about awareness raising. You need to be bringing in experts to speak about these issues in youth centres, in secondary schools, primary schools. There are ways of teaching the children and making it digestible for their age even at primary level.

– Stakeholder 14

There are a lot of very good community-led Garda interventions out in communities around us. Like the schools have the Garda talk on drugs. They go in and they say, don't do drugs. They go in and they say, you don't drink and drive. They go in and say, put on your seatbelt, wait for the green man. But where's the piece around guard yourself from potential exploitation?

– Stakeholder 21

Awareness raising for children via games

The OSCE highlights how technology and the internet provide excellent opportunities to raise public awareness about THB and how online interactive games are being harnessed to raise awareness among children about THB.¹⁶⁷

One stakeholder spoke about how games are a great way to raise sensitive topics with children and highlighted some good practices by various community groups.

There is a group in Ballymun and they, off their own bat, have developed a curriculum for fifth and sixth class students. Now, it's a pioneering programme. They've gotten funding for it. And they have built this curriculum whereby it engages the kids in these conversations and they really open up. There's also the really good initiative by Bradóg, the Monopoly board game that they've designed with all of the local place names. It's about child criminal exploitation, and it really, through the game, and through a little bit of fun, they are getting the kids to talk about it, and they are opening up these really serious conversations.

– Stakeholder 08

Funding for awareness raising

The Commission has previously noted the recent campaigns by Government, State agencies and CSOs but restated its recommendation that multi-annual funding be provided to CSOs to conduct specialised campaigns.¹⁶⁸ While it is positive that multi-annual funding is now available, that funding for anti-trafficking initiatives is provided under the Victims of Crime Fund, and that monies available have increased, this funding is not THB specific. Furthermore, no breakdown is available as to the processes for, and allocations of, financial support for anti-trafficking awareness raising campaigns or other supports to victims.¹⁶⁹ A number of stakeholders felt that providing

¹⁶⁷Organization for Security and Co-operation in Europe (2020), [Leveraging Innovation to Fight Trafficking in Human Beings: A Comprehensive Analysis of Technology Tools](#), p40 & 41.

¹⁶⁸Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p111, 112 & 198.

¹⁶⁹Minister for Justice, Home Affairs and Migration, Jim O'Callaghan TD, [Parliamentary Question 559, Thursday, 18 December 2025](#).

funding for awareness raising to specialised CSOs was crucial and many highlighted that practices in this regard used to be more streamlined, organised and transparent and specific to anti-trafficking work.

Five years ago, there was a very clear process involved in the application for funding for anti-trafficking awareness raising education. There was an application that the Department of Justice sent out, usually around October. This hasn't happened in the last three years, yet the money has been spent. There is no transparent system, yet we still see announcements of funding for anti-trafficking work.

– Stakeholder 21

Specialised awareness raising campaigns

Stakeholders noted that although general public awareness raising was important, targeted and strategic campaigns were also vital and should focus on all types of trafficking particularly child trafficking.

It's not just about organisations being given funding. It's about targeted awareness raising.

– Stakeholder 14

Vulnerability reduction

Specialised child-friendly campaigns, including for migrant children, are of particular importance to raise awareness among children of the forms and risks of THB. The levels of child access to digital devices and social media shows the risk of boys and girls to any form of ICT-facilitated child trafficking. The OSCE notes that all traffickers need are headphones, a microphone, access to the internet and online banking.¹⁷⁰

¹⁷⁰Organization for Security and Cooperation in Europe (2024), [Policy action to address technology-facilitated trafficking in human beings Report of the regional consultations led in 2023 by the OSCE's Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings](#), p7.

Online grooming and exploitation

The growth in AI and advancements in generative AI can also be harnessed by traffickers and those wishing to groom and exploit children. The OSCE highlights the opportunity generative AI provides to traffickers to find, groom, recruit and control potential victims.¹⁷¹ Children can be particularly at risk through this form of recruitment given that increasing numbers of children engage with AI chatbots on a regular basis.

In 2025, CyberSafeKids research, based on surveys of 7,000 children, showed that 26% of 8–12-year-olds and 36% of 12–15-year-olds engage with AI chatbots, up from just 5% and 12% respectively from the previous year.¹⁷² The OSCE stresses that children using social media and online gaming are particularly vulnerable to ICT-facilitated trafficking and notes that the increasing sophistication of generative AI means that it can break down linguistic and cultural barriers and create complex personas.¹⁷³

The increased risks to children of online grooming, recruitment and trafficking were raised by a large number of stakeholders. Many linked vulnerability reduction to awareness-raising initiatives among children to empower them.

Awareness raising of cyber safety generally and of the consequences for children if they create and share images in breach of the law¹⁷⁴ was raised as important. In this respect the development by An Garda Síochána of a new module on online safety and legal responsibilities surrounding sharing intimate images online is welcome.¹⁷⁵

Online recruitment by organised crime

Some stakeholders raised how Ireland and Europe have been too slow in addressing the use of ICT in the recruitment, exploitation and trafficking of children noting how organised crime groups and individuals were very adept at harnessing technology to ensnare children.

¹⁷¹Organization for Cooperation and Security in Europe (2024), [New Frontiers: The Use of Generative Artificial Intelligence to Facilitate Trafficking In Persons, Policy Brief, November 2024](#), pp13 & 16.

¹⁷²CyberSafeKids (2025), [‘A Life Behind The Screens: Uncovering the Realities of a Digital Childhood’, Trend and Usage Report Academic Year 2024-2025](#), p28.

¹⁷³Organization for Cooperation and Security in Europe (2024), [New Frontiers: The Use of Generative Artificial Intelligence to Facilitate Trafficking In Persons, Policy Brief, November 2024](#), p6 & 17.

¹⁷⁴[Harassment, Harmful Communications and Related Offences Act 2020](#) also known as Coco’s Law.

¹⁷⁵Irish Independent, 27 March 2026, [Gardai launch ‘Coco’s Law’ lessons for secondary school students to education on sharing non-consensual images online](#).

In my view, it was a bit of delayed recognition in relation to the scale and the impact that technology has on trafficking. It was very clear that criminals have already realised the power of technology, and the scale that it can bring them in relation to recruitment, reaching out to a much wider audience of targeted victims.

– Stakeholder 10

All the agencies that are monitoring it are noting the increases so it's important to consider how technology has exacerbated the problem. There are a lot of vulnerabilities for children online, and this access that bad actors have to children via technology has made grooming so much easier. Historically grooming a child would have taken a long period of time, building that trust, the manipulation. This is about casting the net as wide as possible and seeing what comes back

– Stakeholder 02

These views are supported by the OSCE research¹⁷⁶ and recent campaigns by Europol¹⁷⁷ and UNODC¹⁷⁸ targeting the rise in organised online recruitment of victims via fake online job adverts. These victims are often trafficked for the purposes of criminal exploitation, in particular for cybercrime.

Lack of regulation of large technology companies' algorithms

A number of stakeholders raised a failure to tackle the private sector, particularly large technology companies, highlighting what they perceived to be a lack of regulation of

¹⁷⁶ Organization for Security and Cooperation in Europe (2026), [Trafficking into cyberscam operations: Implications for the OSCE region, Exploratory assessment](#), p7.

¹⁷⁷ Europol (12 October 2023), [Targeted: Human traffickers luring victims online](#) (The 2023 Hackathon took place from 18 to 22 September in Apeldoorn, the Netherlands, and involved 85 experts: law enforcement officers from 26 countries (22 EU Member States and 4 third countries) as well as representatives from the European Labour Authority, CEPOL, INTERPOL, the OSCE and the International Justice Mission. The 2023 Hackathon focused on filling intelligence gaps in the recruitment of victims of the most frequently reported forms of human trafficking, namely sexual and labour exploitation. The operational activity was organised in the framework of EMPACT.).

¹⁷⁸ United Nations Office on Drugs and Crime, [Forced to Scam: Inside one of the fastest growing forms of human trafficking](#).

their platforms and products.¹⁷⁹ They were particularly concerned about recommender algorithms and children being pushed into viewing exploitative content which some noted was normalising child exploitation and, in some instances, directly contributing to the creation and consumption of child sexual abuse material.¹⁸⁰

YouTube has a powerful recommender algorithm. Then you see these nudifying apps being advertised to them. There are rules and regulations around this, but they're just not adhering to them, and because feeds are so individualised, the design piece is fundamental as so much bad content is being sent their way because of their age or gender. I'm not saying that these companies are going out to deliberately harm children. It's a consequence of the model that they've put in place, and the model is for commercial gain, because it's about engagement, it's about making money.

– Stakeholder 02

Vulnerability of children in care

A key recommendation of the Commission to reduce the vulnerability of children to THB is that specialised strategic plans are developed by the State to prevent trafficking of all children, especially those in State care, regardless of nationality and immigration status.¹⁸¹ Unaccompanied minors and children living in State care accommodation are recognised as particularly vulnerable groups, with the European Commission noting that the vulnerability continues even after they have left the accommodation.¹⁸²

The Commission has made a number of recommendations to reduce the vulnerability of unaccompanied minors and children in State care to THB, including that the State investigate independent reports¹⁸³ of coordinated grooming of these children; that Tusla

¹⁷⁹ Children's Rights Alliance (19 March 2026) [Critical chasm opens for children's protection online at EU level](#) and CyberSafe Kids (3 June 2025) [Social Media Prioritises Profits Over Child Safety](#).

¹⁸⁰ See Section 6.1.3 for explanation of when viewing and paying for CSAM could constitute a child trafficking for sexual exploitation offence.

¹⁸¹ Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p32.

¹⁸² Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Recital (7).

¹⁸³ Canning M, Keenan M, Breslin R (2023) [Protecting Against Predators: A Scoping Study on the Sexual Exploitation of Children and Young People in Ireland](#), p4.

ensure that risks and experiences of trafficking be built into the safety planning to protect against exploitation and re-trafficking; that Tusla end the ‘accommodation only’ practice for unaccompanied minors; and that Tusla be properly resourced to carry out its functions in relation to child victims.¹⁸⁴

Vulnerability of children in care to sexual exploitation

A large number of stakeholders raised issues surrounding children in care, with a number noting how children living in care facilities were easily identifiable by bad actors. Healthcare professionals have highlighted concern to IHREC that they are encountering suspected victims of child trafficking for sexual exploitation through the course of their work, particularly children in care, but that these children are not represented in official statistics. Stakeholders spoke about their concerns that professionals involved in child protection and combatting child trafficking for sexual exploitation seemed to be reluctant or unable to address the problem or that the current systems were inadequate.

It’s only two years ago that the issue of children in State care broke. But I can tell you the exploitation, the sexual exploitation of children in care has been happening for a long time. At least it came to my knowledge in 2021 because taxi drivers were picking up young girls aged no more than 15 or 16 from State care and dropping them off to hotels. There were Irish children, and there were also young girls from migrant backgrounds. I did report it, but nothing came of it as far as I am aware.

– Stakeholder 14

There needs to be a review of the Tusla and Garda protocol. Sexual exploitation is a particular issue for children in care. Children that are in special emergency care, particularly girls, there’s no question some are being sexually exploited.

¹⁸⁴Irish Human Rights and Equality Commission (2025), [Ireland’s Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on Action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), pp20-22.

You've seen the recent research by UCD, and I think there's new research in that area as well.

– Stakeholder 17

Vulnerability of children to criminal exploitation

In addition to the concerns highlighted by stakeholders of the risk of sexual exploitation of children in care and other children without adequate support networks, many also raised concerns about large numbers of Irish and Irish resident children at risk of criminal exploitation, particularly by family members, with some feeling that very little was being done to help these children.

There's a huge cohort of vulnerable children who may not be called victims of child trafficking, but who are victims of criminal exploitation. With children, in the criminal area, it's uniquely complex. There's a very large family, community and cultural piece around children who are victims of criminal exploitation.

– Stakeholder 18

Vulnerability of unaccompanied minors

In relation to unaccompanied minors, Tusla operates the Separated Children Seeking International Protection Service (SCSIP). Tusla highlights that its 'equity in care' principle applies to unaccompanied minors who are entitled to the same standard of care provision as any other child in State care.¹⁸⁵ Tusla reports that all children under the care of Tusla's SCSIP service are allocated a CORU registered professional care worker,¹⁸⁶ some children are allocated a social care worker, while children with greater vulnerabilities and risks are allocated social workers. The SCSIP team hold bi-monthly meetings with An Garda Síochána in relation to unaccompanied minors with a specific focus on children who are missing and children where trafficking or exploitation is a concern.¹⁸⁷

¹⁸⁵ Department of Children, Disability and Equality (2019), [Children Seeking Asylum](#).

¹⁸⁶ Source: Tusla (2026).

¹⁸⁷ Source: Tusla (2026).

The HIQA audit of the SCSIP Service in 2025 makes clear that, while some efforts are being made by Tusla to improve the protection of, and services for, this particularly vulnerable cohort, limited improvements have been achieved from the previous inspection in 2023.¹⁸⁸ HIQA continues to highlight serious concerns about the ability of the service to respond in a timely, effective and child-centred manner with the service found to be not compliant with seven of the eight standards assessed in the audit.¹⁸⁹ Tusla reports that, in response to the HIQA SCSIP inspection in January 2025, Tusla set out an extensive compliance plan, with some of the actions already completed when the report and plan were published in June 2025.¹⁹⁰

The majority of unaccompanied minors and separated children seeking international protection are not taken into care but are instead provided with accommodation under section 5 of the 1991 Child Care Act.¹⁹¹ Where accommodated under section 5, this cohort has no statutory right to care plans, an allocated social worker, aftercare services or to court oversight.¹⁹² These children are already a group for which circumstances make them particularly vulnerable to exploitation, and this approach further exacerbates this.

¹⁸⁸Health Information and Quality Authority (2025), [Health Information and Quality Authority Regulation Directorate monitoring inspection of Child Protection and Welfare Services: Separated Children Seeking International Protection](#), p2 & 13.

¹⁸⁹[ibid](#), p8 & 51 – “Capacity and capability:

Standard 3.1 The service performs its functions in accordance with relevant legislation, regulations, national policies and standards to protect children and promote their welfare. Not compliant.

Standard 3.2 Children receive a child protection and welfare service, which has effective leadership, governance, and management arrangements with clear lines of accountability. Not compliant. Standard 5.3 All staff are supported and receive supervision in their work to protect children and promote their welfare. Not compliant.

Quality and safety:

Standard 1.3 Children are communicated with effectively and are provided with information in an accessible format. Not compliant.

Standard 2.2 All concerns in relation to children are screened and directed to the appropriate service. Substantially compliant.

Standard 2.3 Timely and effective action is taken to protect children. Not compliant. Standard 2.5 All reports of child protection concerns are assessed in line with Children First and best available evidence. Not compliant.

Standard 2.12 The specific circumstances and needs of children subjected to organisational and/or institutional abuse and children who are deemed to be especially vulnerable are identified and responded to. Not compliant.”

¹⁹⁰ [ibid](#), pp52-79.

¹⁹¹ Children’s Rights Alliance (20 March 2026) [Report Card 2026](#), p.227.

¹⁹² Child Law Project (6 November 2023) [Scoping Paper on Care Status of Unaccompanied and Separated Children](#), p.6.

Many stakeholders spoke about the inadequacy of support for unaccompanied minors, children at risk of trafficking and child victims. They had serious concerns, particularly regarding unaccompanied minors, that they were not receiving sufficient supervision and services. Some mentioned that many are disappearing to Northern Ireland and Great Britain, and that there appeared to be an organised element to their disappearance.

They should be treated the same as any other child, but we'd have really serious concerns as to whether or not their cases are treated the same as if an Irish national child went missing.

– Stakeholder 17

An unaccompanied minor or child goes missing from care. Next thing you know, that person will show up at Belfast Airport, looking to fly to Great Britain, or they'll end up in care in Northern Ireland, so there's a clear connection between some sort of movements between Ireland and Northern Ireland, and it seems to be organised to an extent.

– Stakeholder 03

Demand reduction

The amended Directive mandates that Member States criminalise the intentional use of services involving the exploitation of THB victims and undertake education and campaigns about the online dimension of THB and the types of exploitation, to reduce demand.¹⁹³ Ireland has already criminalised a range of such offences in relation to child sexual abuse, child sexual abuse material and the purchasing of sex.¹⁹⁴ The proposed Criminal Law (Sexual Offences, Domestic Violence and International Instruments) Bill 2025 will create the offence of knowingly using the services of a victim of trafficking.¹⁹⁵ The Commission has also noted that the Labour Exploitation and Trafficking (Audit of

¹⁹³ Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Arts 18(1) & 18b (1).

¹⁹⁴ [Child Trafficking and Pornography Act 1998](#) and [Criminal Justice \(Sexual Offences\) Act 2017](#), Part 4.

¹⁹⁵ [Criminal Law \(Sexual Offences, Domestic Violence and International Instruments\) Bill 2025 \(General Scheme\)](#), Part 4, Chapter 1, s8.

Supply Chains) Bill 2021 could reduce demand for TLE¹⁹⁶ and that the Online Safety and Media Regulation Act 2022¹⁹⁷ may also help to reduce demand by assisting the investigation, prosecution and convictions of all ICT-facilitated crimes.¹⁹⁸

Legislation to reduce demand

Stakeholders expressed differing views regarding the success of legislation to reduce demand generally, particularly in the context of trafficking for sexual exploitation under the Criminal Justice (Sexual Offences) Act 2017.¹⁹⁹

I'm not sure that this law or any laws are going to be successful to reduce demand in an activity of that nature. So the purchasing aspect of it, now, because the purchaser has committed an offence, or you suspect they have, you have to caution them, so they don't say anything. And they're certainly not going to go witness for you.

– Stakeholder 11

It was brought in in 2017 with very good intentions but with no power behind it and it's nearly unenforceable. But the thought and the theory behind it is certainly better than not having it.

– Stakeholder 06

Despite this, there was relatively broad support for introducing such measures with views that it sends a powerful message while also raising public awareness and changing attitudes and approaches to dealing with victims.

We need to make sure that migrant women who've been trafficked in and who are being pimped as sex workers, know that they're not criminals. They then can

¹⁹⁶ [Labour Exploitation and Trafficking \(Audit of Supply Chains\) Bill 2021](#).

¹⁹⁷ [Online Safety and Media Regulation Act 2022](#).

¹⁹⁸ Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p85 and Irish Human Rights and Equality Commission (2024), [Contribution to the European Commission's 5th Progress Report on the Fight against Trafficking in Human Beings in the European Union](#), p23.

¹⁹⁹ [Criminal Justice \(Sexual Offences\) Act 2017](#).

feel empowered to report, because the sale of sex has been decriminalised, whereas the purchase is criminalised. That all links again to the fact that it's awareness, it's a deterrent knowing that the laws are there.

– Stakeholder 18

If you actually do want to really tackle demand, you need to really much more strengthen the aspects that address the buyer. But the other big element of that legislation was the decriminalisation of these women. In fairness to the Guards, this is where they've really excelled. They're now approaching them as vulnerable victims, and as potential victims of trafficking, even if it's not trafficking. That's been really successful in terms of legislation. It's the normative and declarative effect.

– Stakeholder 12

Reasonably similar views were expressed by some stakeholders in relation to the Criminal Justice (Engagement of Children in Criminal Activities) Act 2024,²⁰⁰ with the majority feeling that, while it may be difficult to prosecute and secure a conviction, the sentiment of the legislation was important as it sent a clear message that grooming children into criminality was an offence.

You know that new Act about engaging children in criminal activity? It's important too. But is it just a sticky plaster situation?

– Stakeholder 06

²⁰⁰[Criminal Justice \(Engagement of Children in Criminal Activities\) Act 2024](#).

That was so important, because it wasn't even about the fact that now there is a criminal offence of grooming children into criminality. It was that it's a deterrent, that people know that that's there despite it being difficult to prosecute.

Organisations working with youth and criminality were so glad that there was an actual law that was sending a message particularly to younger adult men in the neighbourhoods and communities that they would be punished for the grooming.

– Stakeholder 18

Protection

Identification of child victims

The low numbers of identifications of child victims of trafficking or exploitation in Ireland was raised by almost all stakeholders across all sectors. The issue of under identification of child victims including Irish nationals has been consistently highlighted by the Commission.²⁰¹

That's a concern that we have had for the last while. We've been very conscious of the really low rates of identification of child victims of trafficking.

– Stakeholder 09

It's very much under-reported and that's kind of worrying. Other countries with more robust systems are better at identifying.

– Stakeholder 19

Ireland v UK Identifications

Stakeholders across a range of sectors highlighted the disparity in the numbers of child victims in Ireland compared to other jurisdictions. The UK was consistently named as a country that was doing well with regards identifying potential child victims. One

²⁰¹ Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p203.

stakeholder stressed that the UK collects statistics on both presumed and officially recognised child victims whereas Ireland records officially recognised victims only. This point regarding presumed or suspected victims not being recorded in Ireland was raised by a number of stakeholders who noted that An Garda Síochána might be aware of many more potential victims but that they may not want to come forward or there may not be enough evidence to officially identify them as victims. This could be particularly true for children who may be less likely to come forward due to fear or because they do not identify themselves as victims of trafficking. Given that identification will no longer be linked to cooperation with criminal investigations under the new NRM, the number of child victims identified may increase, but more will still also need to be done to identify them.

Officially there could be two victims, but unofficially there could potentially be many more but they won't be recorded on any system. The figures can be unquantifiable because none of them came forward. So I would say the figures are very low only because they're the only ones identified, but they're much bigger, much, much bigger.

– Stakeholder 22

It's only the tip of the iceberg. The ones that are being identified are the ones who have come forward. It's the ones that are so fearful of law enforcement, or so fearful of talking, speaking out about it, that they disappear.

– Stakeholder 06

Some stakeholders noted that a reluctance to come forward might be particularly true in relation to children who fell victim to ICT-facilitated grooming and exploitation. They listed how children may be afraid of getting into trouble with their parents for being online without permission.

High profile cases in the media were highlighted, such as that of Alexander McCartney, who was estimated to have targeted around 3,500 child victims,²⁰² illustrating the ICT-facilitated ease of access.

²⁰² BBC News (25 October 2024) [Abuser in 'UK's largest catfishing case' jailed for life](#).

I hear some of the worst stories, where parents think their teenage girl or boy is in their bed asleep during the night, and all night they're talking to some predator.

– Stakeholder 12

International good practice – Identification in the United Kingdom

It is mandatory that first responders in the UK (England and Wales), refer potential and suspected child victims of modern slavery and human trafficking to the NRM and the child's consent is not required.²⁰³ Before referral to the NRM, which is made online, children must be safeguarded.²⁰⁴ Once a referral is made, competent authorities must make a first instance 'reasonable grounds' decision within five days. The US Department of State notes that, for suspected child victims of modern slavery and THB, the Home Office recently devolved the NRM decision-making process to local authorities and that by January 2025 this process had already been implemented in 20 local authority areas.²⁰⁵ In April 2025, local decision-making was extended to ten additional areas.²⁰⁶ This process has been commended by CSOs as not only resulting in more timely and reliable decision-making regarding child victims but also ensuring that assistance and services are provided to child victims more quickly.²⁰⁷

The most recent UK statistics, for Quarter 2 of 2025, show that 1,717 children were identified as potential victims of modern slavery and THB, constituting 30% of the total NRM referrals and the highest number per quarter ever in the UK.²⁰⁸

Figures for the UK in 2023 show that 7,432 children were identified as potential victims of THB, primarily for criminal exploitation.²⁰⁹ Children accounted for 44% of all NRM referrals and 5,797 (78%) of these potential child victims were UK nationals.²¹⁰ However, the Independent Anti-Slavery Commissioner and ECPAT note that despite the 138%

²⁰³UK Government (2025), [National referral mechanism guidance: adult \(England and Wales\)](#), Section 2.1. Ireland also has statutory child safeguarding arrangements which do not depend on a child's consent. Child protection concerns are referred to and managed by Tusla under the child protection framework.

²⁰⁴[ibid](#), Section 2 & 2.1.

²⁰⁵US Department of State (2025), [2025 Trafficking in Persons Report: United Kingdom](#).

²⁰⁶UK Home Office (2025), [Modern slavery: National Referral Mechanism and Duty to Notify statistics UK, quarter 2 2025 - April to June](#), Section 2.

²⁰⁷US Department of State (2025), [2025 Trafficking in Persons Report: United Kingdom](#).

²⁰⁸UK Home Office (2025), [Modern slavery: National Referral Mechanism and Duty to Notify statistics UK, quarter 2 2025 - April to June](#), Section 2.

²⁰⁹Independent Anti-Slavery Commissioner & ECPAT UK (2025), [Child Trafficking in the UK 2024: A snapshot](#), p8.

²¹⁰[ibid](#).

increase in children referred to the NRM in the period 2019 to 2023, the number of children who have been formally recognised as victims of THB is decreasing, due to immigration law changes which raised the evidentiary threshold for ‘reasonable grounds’ decisions. They note that the percentage of children receiving positive ‘reasonable grounds’ decisions dropped from 90% in 2022 to 78% in 2023, while the number of children receiving positive ‘conclusive grounds’ determinations (formal recognition) decreased from 92% to 80% in the same period.²¹¹ Despite this drop in formal identification of children as victims of THB, the mandatory NRM referrals and large numbers of children, including UK national children, being identified as potential victims of TCA, suggests that organisations and professionals working as first responders are aware of the signs and indicators of THB in children and the issues and dynamics arising.

However, some stakeholders noted that identification as a presumed victim was just the first step and that the UK was not performing well in the provision of services to child victims due to long waiting times for them to be formally recognised as victims.

I think the UK has done identification well. I don’t think anything they do after that is particularly well done.

– Stakeholder 21

The example from the UK is very illustrative in terms of identification, and I think very damaging in the sense that, you know, you raise expectations for those children who think that they’re going to be supported in some way and they’re left languishing because the processes can’t keep up with that amount of numbers, it’s actually not helping those children.

– Stakeholder 18

Over-emphasis on official identifications

Other stakeholders, particularly those working in the public sector to combat child trafficking, highlighted that, while numbers of formally identified child victims in Ireland

²¹¹ [ibid.](#)

are low, they felt that there was an over-emphasis on numbers. Some stakeholders felt that the most important part was that children who have been exploited or abused receive appropriate services and supports.

Historically, numbers are low but we all kind of tend to get too caught up in the numbers of identified victims.

– Stakeholder 22

Identification based on the immigration system

Many stakeholders spoke about their concerns that Irish children were not being identified as victims, primarily due to the focus of the existing system on immigration and a reluctance to accept that child trafficking can happen to children already in Ireland.

When child trafficking has been addressed, if it has been addressed, it has been primarily within the category of unaccompanied minors and separated children seeking international protection. So it's always about the other child, it's an othering, it's unaccompanied minors or it's children in care and not necessarily Irish children in care, although obviously it is Irish children in care as well. This is a huge concern.

– Stakeholder 08

What about nationally trafficked children? It's a real issue, because people don't want to acknowledge that it is homegrown.

– Stakeholder 19

Conceptions of child trafficking affecting identification – terminology issues

Many stakeholders mentioned that they felt that another reason could be that there were different conceptions of child trafficking, grooming and exploitation among professionals, or a preference to use what was perceived as 'softer' terminology particularly in relation to sexual exploitation of children. Others spoke about grooming exploitation and trafficking forming part of a continuum.

The reasons for that, I think, are multifaceted. Number one is that the line between exploitation and trafficking can be a very, very, very grey area. There is like a continuum of exploitation, and that could be child sexual exploitation, criminal exploitation, or for a whole range of other purposes. And within that, some cases are trafficked and some may not hit that threshold.

– Stakeholder 01

There is a complete blanket reluctance to call it child trafficking. And there's the whole 2017 reclassification of the child sexual exploitation statistics that has never been properly answered. There is this huge confusion when it comes to child trafficking for sexual exploitation because now all the sexual exploitation cases are outside of the trafficking. So the softer terms will be used when it comes to child sexual exploitation, the exploitation and grooming. And when it comes to child criminal exploitation, it again is exploitation and grooming. So there is that real reluctance to name it for what it is. I think the term grooming is doing the children a disservice because grooming is the process that leads to the exploitation. So it almost waters it down or makes it sound a little bit benign, to be honest.

– Stakeholder 08

Many expressed serious concerns as to the lack of identification of children who are being criminally exploited, or exploited in other ways, whether victims of trafficking or not. They felt that this was the area where children caught offending needed most to be viewed through a trafficking lens so law enforcement and others could consider that they might be a victim as opposed to a suspect.

There is the risk of misidentification, that's the problem. So children, you know they're being treated as offenders and suspects, rather than potential victims, of non-sexual forms, like there's labour, forced criminality, begging.

– Stakeholder 13

Some stakeholders also felt that the term grooming also led to victims feeling ashamed and that they were to blame for their exploitation. Stigma and shame in turn prevent

victims, particularly children, from coming forward, which, as noted, is a particular concern in relation to ICT-facilitated abuse and exploitation.

I've heard that it implies a weakness that they allowed themselves to be groomed. I do think that the term grooming could do with some interrogation. I also think that it's still very associated with a kind of dodgy old guy in a rain mac grooming a prepubescent child, so perhaps we need a better word to describe this phenomenon, or that it needs to be better understood, what it looks like. I think there's a view that if you fall for it, if you fall into the trap. You're at fault and you were foolish to have trusted that guy.

– Stakeholder 12

Typically, a third would say they kept it to themselves. Sometimes it's because they're afraid they will get into trouble, or their device will be taken away. That's the challenge, as we have no real sense of the size of this problem. If children aren't telling an adult, if they're not reporting it to an Garda Síochána, how do we know?

– Stakeholder 02

Other issues with terminology arose. Some stakeholders warned about the conflation by the public and the State of trafficking with other offences such as smuggling, organised prostitution or child sexual abuse.

Raising awareness in general is huge, because still to this day, people don't know what human trafficking is. They conflate it with smuggling and technically that could be trafficking, if they're getting exploited.

– Stakeholder 06

National Referral Mechanism

Statutory NRM commencement

Although not yet commenced, while the Operational Guidance is still under development, the new NRM has now been placed on a statutory footing under the

Criminal Justice (Sexual Offences and Human Trafficking) Act 2024.²¹² A formal NRM is a requirement of the amended Anti-Trafficking Directive.²¹³ The placing of the NRM on statutory footing has been commended by the Commission (while also noting gaps such as in regard to assistance, a key aspect of an NRM).²¹⁴ This move was praised by many stakeholders as a positive development noting also the Directive's focus on the best interests of the child and the need for a victim-centred and child rights-based approach.

What we're doing well is putting the National Referral Mechanism on a legislative footing. I mean, we're the first European country to do that. That is pioneering in many ways and a good thing.

– Stakeholder 08

It's a victim-centred approach. That's the way we should be. That's a principled approach, a human rights approach and children's rights approach. The core is that everyone acts in the best interest of children. It's in law and that dictates the bottom line for every agency and NGO in the State and how we all approach this work.

– Stakeholder 05

A number of stakeholders expressed disappointment regarding the delayed commencement of the new NRM.

We look at the Operational Guidance being kicked down the road on a daily basis. We received a copy of the draft guidance in December 2024, what has happened to that? Was it just scrapped?

– Stakeholder 21

²¹²[Criminal Law \(Sexual Offences and Human Trafficking\) Act 2024](#), Part 3.

²¹³Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Art 11(4).

²¹⁴Irish Human Rights and Equality Commission (2024), [Contribution to the European Commission's 5th Progress Report on the Fight against Trafficking in Human Beings in the European Union](#), p34 and Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#) p130.

We really want the new NRM to be operational, so we have a coordinated approach between all the stakeholders and bodies.

– Stakeholder 09

Even the Operational Guidance in relation to the NRM. There's very little detail in terms of how it's going to operate or work. So we're very much in the dark.

– Stakeholder 15

Other stakeholders, however, stressed that referrals can still be made under the existing system and that they would like to see more referrals being made while awaiting finalisation of the new NRM.

There will be direct referrals by many bodies when the revised approach is fully in place, but in the meantime, we need to make sure that until that time, that the referrals are being made to An Garda Síochána and that vulnerable victims, particularly children, are being identified and referred.

– Stakeholder 18

Forced criminality is probably happening. We all need to get that message out to the public, to State agencies and others. Also, we're not recognising a lot of children who have been sexually exploited in Ireland. If that is happening, it needs to be reported to An Garda Síochána.

– Stakeholder 06

The formalisation of the new NRM in statute, replacing the current system, was welcomed by many stakeholders with hopes that this should also ensure that THB is no longer erroneously conflated with the immigration and international protection systems.

What we have has traditionally been a migration-focused trafficking referral system.

– Stakeholder 18

There is a clear trend of children who enter Ireland at a port of entry and are then identified through the immigration and asylum process (in Ireland or the UK). It's through their asylum application that they're referred to the NRM.

– Stakeholder 03

Multi-stakeholder identification

All stakeholders, who spoke about the new NRM, were supportive of the new role of Competent Authorities and Trusted Partners in referring presumed victims and formally identifying victims. Some noted that this was in line with international good practice, particularly for children including the OSCE 'Social Path' approach which advocates for a multi-disciplinary approach to identification which does not rely solely on law enforcement and includes child-specific procedures.²¹⁵

International good practice – OSCE's 'Social Path' model

In their publication, 'Putting Victims First: The 'Social Path' to Identification and Assistance' the OSCE promotes an approach to identifying victims of trafficking that prioritises access to protection and support services by vesting authority for conclusive identification in social protection actors. This ensures long-term assistance and durable solutions for child victims which are not linked to participation in criminal justice processes. It recognises that many victims, including children, may be unwilling or unable to cooperate with law enforcement but should still be able to access assistance and protection.²¹⁶ The OSCE notes how early identification, outside of the criminal justice system, is critical for protecting victims of trafficking, particularly children who often face complex vulnerabilities and may not recognise themselves as victims.²¹⁷ Frontline professionals in social services, education, healthcare and civil society organisations are identified as key actors in detecting indicators of trafficking and referring potential victims to support mechanisms.²¹⁸

²¹⁵Organization for Security and Cooperation in Europe (2023), [Putting victims first: The 'social path' to identification and assistance](#), pp30 & 31.

²¹⁶[ibid](#), p7.

²¹⁷[ibid](#), p19.

²¹⁸Organization for Security and Cooperation in Europe (2023), [Putting victims first: The 'social path' to identification and assistance](#), p12.

For child victims, the OSCE highlights the need for child-centred identification procedures, including specialised training for professionals, multi-disciplinary cooperation and safeguarding mechanisms that prioritise the best interests of the child.²¹⁹ Once identified, children should receive immediate access to services such as safe accommodation, guardianship, psychological support, healthcare and legal assistance.²²⁰

Many believed that the new NRM should encourage more victims to come forward, including children, while also freeing up Gardai time to investigate suspected cases of trafficking.

The inclusion of other parties, aside from the Garda Síochána to identify victims or potential victims, that's really positive, because at the end of the day a child might be more frightened, a young person might be really frightened to speak to law enforcement, especially if that young person is coming from a migrant background where they have more fear of the police.

– Stakeholder 14

Resourcing, training and staffing issues

Despite a broad welcome for the new, statutory NRM, stakeholders stressed the additional resourcing and staffing that would be required to ensure people were correctly trained to identify victims and work together to provide supports and services.

When the identification piece moves to a more broadly based or wider range of people, there's therefore also the risk that there won't be complete engagement from those stakeholders and then where are you. It's like anything, it depends on resourcing, training, and staffing issues.

– Stakeholder 16

²¹⁹ [ibid](#), pp30 & 31.

²²⁰ [ibid](#), p31.

It's really difficult for us to plan in terms of resourcing, or even what our role is.

We don't know at what point we're going to be providing services.

– Stakeholder 09

It will take time and huge resourcing to train everyone.

– Stakeholder 03

In the context of child trafficking, the proper resourcing of Tusla was a particular concern. This is despite significant investment and growth in services.

I am already concerned about resourcing for children in care, as there are already severe resource issues within the system.

– Stakeholder 12

In terms of the new NRM with the child-specific lens on it and the role of Tusla.

On paper that looks very promising you'd almost presume that every staff member of Tusla will have the opportunity to report suspicions of child trafficking into the operational committee, but the reality is that there will be the appointment of a designated person in an agency that is already struggling with resources. I mean, they are doing great work, they're doing their best, but it's very difficult.

– Stakeholder 21

Need for clear timelines

In addition to concerns about adequate training and resourcing, many stakeholders highlighted the need for clear timescales to be included in statute with many noting the long delays in the UK for children waiting for official identification (conclusive grounds decision). Clear and realistic timelines are also cited by the OSCE as an integral part of any NRM.²²¹

²²¹ Organization for Security and Cooperation in Europe (2023), [Putting victims first: The 'social path' to identification and assistance](#), p31.

I suppose the timelines, the oversight isn't there in legislation. Without proper timescales, the process is going to be so slow that there's just going to be this huge cohort in kind of limbo.

– Stakeholder 21

NRM and increased identification of child victims

The commitments in the 2024 Act²²² and the NAP to child-specific identification measures are welcome²²³ and provide a pathway for compliance with the amended Directive.²²⁴ It is the State's hope that the new NRM, in conjunction with the NAP, will make it easier for more adult and child victims of THB to come forward and be identified.²²⁵ However, many stakeholders stressed how adult victims often do not initially self-identify as victims of trafficking, but that in the case of children, they felt that most, if not all, children and particularly unaccompanied minors, do not and will not realise that they are a victim of trafficking.

They don't announce their trafficking. The majority of young people don't even know they have been trafficked. And oftentimes it's only after some kind of a trusting relationship has been built up that you would hear it.

– Stakeholder 07

Stakeholders highlighted how methods and techniques used by traffickers to groom children, particularly children groomed into sexual or criminal exploitation, further reduced the chances of children identifying as a victim of trafficking.

We can't push the responsibility onto a child for self-identification. If you have a child, and I've seen them, and you'll have come across them as well, I've seen three kids on a LUAS sometime during the years standing in front of me talking about their day. One of them having to take out a calculator to work out how

²²² [Criminal Law \(Sexual Offences and Human Trafficking\) Act 2024](#), Part 3, s23(1)(c)(iv).

²²³ Department of Justice, Home Affairs and Migration (2023), [Third National Action Plan to Combat and Prevent Human Trafficking 2023-2027](#), Action 1.10.

²²⁴ Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Art 19b(2)(a).

²²⁵ Minister for Justice, Helen McEntee TD, [Parliamentary Question 1063, 22 January 2025](#).

much money he made from standing at the top of the laneway keeping sketch for the Guards. He'd made 800 quid that day. Selling drugs or whatever was being sold. If you have a child who is vulnerable in some way or description receiving 800 quid cash into their hand, what child will self-identify as a victim of anything?

– Stakeholder 21

Children in care. They're coming back with brand new phones, they're wearing designer gear, and you're looking at those phones, but you're giving them, like, 20 euro a week pocket money. Are you not joining any sort of dots here, you know? They don't identify as victims. Not at all! No, they don't, sure they're getting great free stuff for doing stuff.

– Stakeholder 17

It might just be more like a phone kind of text-based relationship, and then it would build from there. And it would become, certainly what the girl would understand as, a boyfriend-girlfriend relationship, and it was some of that love-bombing stuff, gifts, a new phone, taken to parties, things like that. They feel special.

– Stakeholder 12

Child-specific NRM

The Commission has previously suggested the introduction of a statutory child-specific NRM as a way to support and strengthen the identification, protection and provision of sufficient support and assistance to child victims.²²⁶ The introduction of a child-specific NRM is supported by SERP,²²⁷ with a clear majority of stakeholders expressly stating that

²²⁶Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p3.

²²⁷ Sexual Exploitation and Policy Institute (2025) [Submission to GRETA Group of Experts on Action against Trafficking in Human Beings On The Fourth Evaluation Round Of The Implementation Of The Council Of Europe's Convention On Action Against Trafficking In Human Beings Thematic Focus: Addressing Vulnerabilities To Trafficking In Human Beings](#) p.12.

a properly resourced child-specific NRM, with separate child-specific protocols, procedures and processes, could be operated and managed by Tusla.

On a practical level, it could suit Tusla because in terms of child trafficking, it's predominantly Tusla who have responsibility for children. So it probably would make it easier.

– Stakeholder 07

If Tusla were able to manage that, and to manage the administration and the expectations of what an NRM would look like if it was just for child victims, then yes, it's very good, it's aspirational, but it is an idea. I am not sure how it would work in practice, but I'd love to see how it would work, and I think it would probably need a lot of resources within Tusla, because Tusla will have to do everything. – Stakeholder 06

As noted, the legal definition of child trafficking differs to that of adult trafficking as it does not require a 'means' element. A practical consequence of this is that this lower threshold requires a different approach to identification. Consequently, many stakeholders were in favour of a statutory child-specific NRM or a child-specific pathway to recognise this important difference. Another reason mentioned by a significant number of stakeholders for a child-specific NRM or child-specific procedures was that children generally need different supports and services to adults and that child victims are entitled to special provisions and need additional supports.

But in terms of children, though, children are not just like small adults. You know, so is there going to be a child-specific approach here, because this is really what it's about, isn't it? Well, I think it's either a separate NRM, or there's maybe a clearly embedded pathway within the NRM that's child-centred, so the safeguards are there. You have to have rapid protection decisions made, and multi-agency cooperation is needed. So there does have to be some delineation. How they do it, I don't know, but if they're not going to do a separate one, then there has to be a clear line in the one that they have that deals with children.

– Stakeholder 13

Some stakeholders highlighted how a separate NRM for children would bring more of a focus on child victims, would ensure that they were not ‘lost’ in the adult system, and provide greater accountability in relation to child victims.

There was massive disappointment around the fact that there wasn’t a child-centred mechanism. Children have been shoehorned into the NRM that is, you know, primarily for adults. And that comes about from this misconception or this reluctance to see the prevalence of child trafficking for what it is and a reluctance to call it that.

– Stakeholder 08

One of the reasons why the child-specific NRM is important is because they’ll be focused solely on children, on the issues of children. I know IHREC had recommended it, and I totally support IHREC in recommending it because if we are just putting them under the general NRM, they just get lost in the system. The purpose of that child-specific NRM is so people are responsible for certain issues and have certain roles to play. Once you have that role delegated to you, you cannot hide from it anymore. You’ll be held accountable, in concrete terms.

– Stakeholder 14

These views contrasted with a limited number who felt that a child-specific NRM was unnecessary.

It doesn’t make any sense to have two parallel systems, and not to have one system where you might have a child and their parents who are being dealt with through the NRM. You might have an unaccompanied minor who ages out, who would have to move to a different system. It would overcomplicate things.

– Stakeholder 18

The UK has a child-specific pathway in operation where referrals, unlike those for adults, do not require the consent of the child victim.²²⁸ In 2021, Portugal established a child-specific NRM protocol in line with OSCE good practice to have child-specific

²²⁸UK Government (2025), [National referral mechanism guidance: adult \(England and Wales\)](#), Section 2.1.

identification procedures and supports²²⁹ and that NRM child services are linked to national child statutory services.²³⁰ This protocol however fails to follow the ‘social path’ system as entry into the NRM still requires law enforcement cooperation.

International good practice – Portugal’s child-specific NRM protocol

The European Commission highlights that in 2021, Portugal launched the ‘Protocol for the definition of action procedures for the Prevention, Detection and Protection of (presumed) children victims of trafficking in human beings’,²³¹ a child-specific NRM protocol. The NRM establishes procedures for the prevention, detection, identification, support and protection of (presumed) child victims of THB.²³² It is aimed at professionals in contact with children and tasked with preventing, detecting and protecting child victims and consolidates and strengthens the mechanisms for coordination, cooperation and communication of their efforts.²³³ The Protocol aims to protect the fundamental rights of children and takes a victim-centred and best interests of the child approach including by reducing the risk of re-victimisation or re-trafficking.²³⁴ The NRM is supported by Portugal’s Fifth Action Plan for the Prevention and Combatting of Human Trafficking 2025-2027 which provides clear and coordinated response structures and improved accountability regarding child trafficking and exploitation.²³⁵

The establishment of a child-specific NRM protocol was commended by GRETA.²³⁶ The Group noted that it provides national authorities involved in the identification and protection of child victims with guidelines for a child-protective intervention (in which reference is made to the best interests of the child; right to information; the right to be

²²⁹Organization for Security and Cooperation in Europe (2023), [Putting victims first: The ‘social path’ to identification and assistance](#), p12.

²³⁰Office for Democratic Institutions and Human Rights (2022), [National Referral Mechanisms: Joining Efforts to Protect the Rights of Trafficked Persons, A Practical Handbook - Second Edition](#) p112.

²³¹European Commission, [Portugal: General situation regarding trafficking in human beings](#).

²³²Secretaria Geral do Ministerio do Trabalho Solidariedade e Segurança Social, 4 June 2021, [New national referral system to combat child trafficking presented](#). Protocol (in Portuguese) can be found [here](#).

²³³[ibid.](#)

²³⁴[ibid.](#)

²³⁵Office of the United Nations High Commissioner for Human Rights, [Portugal’s Submission on the call or Inputs from Sale, Sexual Exploitation and Sexual Abuse: Progress, New Frontiers and the Path Forward](#), p3.

²³⁶Council of Europe (2022) [GRETA Third Evaluation Report: Portugal](#), p40.

heard and to participate in court proceedings); identification indicators for different forms of exploitation; guidelines and steps for victim identification and the responsibilities of prosecutors, judges and social workers; an age assessment process; procedures for the appointment of a legal guardian; details on assistance, reception, (re)integration and repatriation (where appropriate); details on children's rights to health care, education, psychological assistance and access to justice); and training guidelines.²³⁷ However, despite this child-specific process, the US Department of State highlights, in its 2025 report on Portugal, that comparatively few children and Portuguese nationals are identified as victims of THB and that formal identification continues to be undertaken primarily by police and requires cooperation with investigations and prosecutions.²³⁸

The OSCE Office for Democratic Institutions and Human Rights (ODIHR) recommends that child-specific NRMs or pathways are directly linked to child protection systems and staffed by recognised child specialists and supported by civil society and specialist NGOs.²³⁹ To combat child trafficking the OSCE Office of the Special Representative and Co-ordinator for Combatting Trafficking in Human Beings further recommends the development of comprehensive child protection frameworks for all vulnerable children.²⁴⁰ In Ireland, this could be done by mainstreaming child trafficking efforts through Children First.

International good practice – Child-specific NRM pathways within child protection systems

The OSCE's Office for Democratic Institutions and Human Rights (ODIHR) emphasises that NRMs are cooperative national frameworks designed to ensure the identification, referral and protection of victims of trafficking, including children, through coordinated

²³⁷[ibid](#), pp40 & 41.

²³⁸US Department of State (2025), [2025 Trafficking in Persons Report: Portugal](#).

²³⁹Office for Democratic Institutions and Human Rights (2022), [National Referral Mechanisms: Joining Efforts to Protect the Rights of Trafficked Persons, A Practical Handbook - Second Edition](#), p33.

²⁴⁰Organization for Security and Cooperation in Europe (2026), [Survey Report 2026: Tracking Implementation of the OSCE Commitments and Recommended Actions to Combat Trafficking in Human Beings](#), p81.

multi-disciplinary action between State agencies responsible for law enforcement, child protection, education, healthcare and migration and civil society.²⁴¹

Child victims require specific safeguards within NRMs due to their heightened vulnerability and the complex protection needs associated with trafficking.²⁴² Child protection principles, particularly the best interests of the child, should guide all decision-making processes within the mechanism.²⁴³ Children should have access to specialised services, including guardian-advocates, child-appropriate accommodation, medical and psychological care, legal assistance, long-term support and social inclusion.

To support child-specific referral pathways the OSCE believes that States should also establish national focal points for child victims of trafficking.²⁴⁴

International good practice – National Focal Points for child victims (OSCE)

The OSCE highlights the importance of designating specialised National Focal Points (NFPs) to strengthen the identification, protection and assistance of child victims of trafficking. NFPs, which could be located within an Ombudsman for Children Office or statutory child protection agency, would serve as central coordinating actors within national anti-trafficking systems, facilitating cooperation between law enforcement, child protection authorities, migration services and civil society organisations.²⁴⁵ Their primary role is to ensure coordinated assistance is available to national and non-national child victims primarily via data and information sharing nationally and internationally, and to facilitate support to cross-border cooperation, particularly in cases involving missing or unaccompanied children and transnational trafficking networks as well as ensuring continuity of care if a child is returned to their country of origin or habitual residence.²⁴⁶ The OSCE noted how NFPs, with clear mandates and sufficient resources, can help ensure greater accountability for child victims within the

²⁴¹[ibid](#), p74 & 95.

²⁴²[ibid](#), p46 & 47.

²⁴³[ibid](#), p72 & 74.

²⁴⁴Organization for Security and Cooperation in Europe (2020), [Establishing National Focal Points to Protect Child Victims of Trafficking in Human Beings](#), p19.

²⁴⁵[ibid](#), pp19-23.

²⁴⁶[ibid](#), pp25 & 45.

national anti-trafficking responses and ensure that they are treated as full rights holders.²⁴⁷

Supports and services to child victims

In addition to allowing for formal identification as a victim of THB, entry into the NRM makes a range of State and CSO services available to presumed and identified victims.²⁴⁸ The Commission has consistently highlighted how assistance to victims should never be conditional on cooperation with the criminal justice process, but that provision of appropriate support and services, in particular accommodation, is essential for victims to be able to engage in the criminal justice process.²⁴⁹ This is in line with the amended Directive, and GRETA recommendations.²⁵⁰ It is also broadly consistent with the OSCE ‘social path’ approach which fully detaches identification and long-term assistance to victims from participation in criminal proceedings, but allows for information obtained during this process to be shared with law enforcement should a victim decide to participate in criminal proceedings.²⁵¹

A number of serious deficiencies have been identified by the Commission in relation to assistance to child victims of trafficking and unaccompanied minors who are in State residential care in relation to accommodation and access to social workers, legal advice, healthcare and education.²⁵²

²⁴⁷ [ibid](#), pp20 & 23.

²⁴⁸ [Criminal Law \(Sexual Offences and Human Trafficking\) Act 2024](#), s31 & s32.

²⁴⁹ [ibid](#), and Irish Human Rights and Equality Commission (2025), [Ireland’s Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p132.

²⁵⁰ Council of Europe (2022), [GRETA Third Evaluation Report: Ireland](#), para 24.

²⁵¹ Organization for Security and Cooperation in Europe (2023), [Putting victims first: The ‘social path’ to identification and assistance](#), pp30 & 31.

²⁵² Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), pp208-226 and pp237-247 which draws on reports and statements by the Ombudsman for Children, Department of Education, CAMHS, the Special Rapporteur on Child Protection and others.

Age assessments

The Commission has previously expressed concerns about the manner in which age assessments are undertaken by the State.²⁵³ The absence of clear procedures to effectively and appropriately assess the age of unaccompanied minors in the international protection process has led to children being placed in inappropriate accommodation with adults and experiencing considerable uncertainty and vulnerability, including financial vulnerability.²⁵⁴ The Commission has recommended that age estimation assessments should be supported by strict policy guidelines that are child-centred and adapted to the person's specific needs (culture, gender, etc.), should not be based on a medical test and should include an appeal process.²⁵⁵

A number of stakeholders raised issues relating to age assessments, the presumption of minority and potential conflict between the 2024 Act and the EU Pact implementing legislation. The Commission and stakeholders referenced as positive the introduction of a statutory presumption of minority in respect of the NRM in the 2024 Act.²⁵⁶ They also shared the Commission's concerns as to how the new NRM will operate in parallel to the new migration and asylum measures to be introduced in Ireland, particularly for unaccompanied minors and migrant child victims.²⁵⁷

We have really serious concerns because it doesn't explicitly state the age of minority presumption in relation to age assessments, so there needs to be an alignment between all the legislation in relation to unaccompanied minors.

– Stakeholder 17

²⁵³Irish Human Rights and Equality Commission (2025), [Observations on the General Scheme of the International Protection Bill 2025](#), pp9 & 10.

²⁵⁴Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p17.

²⁵⁵Irish Human Rights and Equality Commission (2023), [Trafficking in Human Beings in Ireland Second Evaluation of the Implementation of the EU Anti-Trafficking Directive](#) p152.

²⁵⁶[Criminal Law \(Sexual Offences and Human Trafficking\) Act 2024](#), section 26.

²⁵⁷Irish Human Rights and Equality Commission (2025), [Observations on the General Scheme of the International Protection Bill 2025](#), p17 & 18.

One stakeholder also noted how conducting appropriate age assessments was also relevant to THB investigations and prosecutions, speaking of instances where confusion over the age of a defendant has held up trials in Ireland.

That's coming up regarding the age of the children who are suspects. They'll have false documentation. So nobody knows exactly what age they are. And so, if you want to prosecute somebody and if you don't know if they're a child, or they're an adult, how do you try them? Because you can't try them in an adult court if they're a child, but you don't have any paperwork for that. So we're left with having no idea what age they are, subject to showing the judge all the different paperwork and going, here, make a decision, we can't.

– Stakeholder 13

The International Protection Act 2026 implements new immigration procedures related to the EU Pact on Migration and Asylum.²⁵⁸ The Act was commenced in June 2026. Part 3 of the International Protection Act 2026 establishes new statutory procedures for age assessments of unaccompanied minors.²⁵⁹ Where there are doubts in relation to the age of an applicant, a multi-disciplinary assessment will be carried out.²⁶⁰ There is also provision for medical examination to determine age.²⁶¹ The Minister is required to make regulations prescribing the suitable means of the multi-disciplinary assessment and the suitable medical means of assessing the age of the applicant, together with other aspects of the age assessment such as the qualifications, training and experience of those carrying out the assessments.²⁶²

The Commission had previously expressed serious concerns about inadequate legislative scrutiny²⁶³ of the International Protection Act 2026²⁶⁴, including the lack of detail on and inadequate provisions regarding age assessments.²⁶⁵ These concerns

²⁵⁸ [International Protection Act](#) 2026.

²⁵⁹ [International Protection Act](#) 2026, Part 3.

²⁶⁰ [International Protection Act](#) 2026, sections 55 & 56.

²⁶¹ [International Protection Act](#) 2026, section 57.

²⁶² [International Protection Act 2026](#), section 63.

²⁶³ Irish Human Rights and Equality Commission (26 February 2026), [No Meaningful Debate on the International Protection Bill as it Passes Through Remaining Dáil Stages](#).

²⁶⁴ [International Protection Act 2026](#).

²⁶⁵ Irish Human Rights and Equality Commission (2025), [Observations on the General Scheme of the International Protection Bill 2025](#), pp9 & 10.

were echoed by the Ombudsman for Children's Office which also highlighted how inadequate pre-legislative scrutiny prevents public examination of a process which may not comply with international and European human rights standards.²⁶⁶

The Commission has highlighted the importance of conducting age assessments under the International Protection Act 2026 in a clear, child-centred and human rights-compliant manner. Under the Act, unaccompanied minors will be exempt from the 12-week asylum border procedure.²⁶⁷ The Irish Refugee Council has expressed concern that unaccompanied minors will be incorrectly subject to the 12-week procedure referring to previous cases where unaccompanied minors have been incorrectly processed as adults, with some sleeping rough post-arrival.²⁶⁸

Special emergency arrangements

Another risk to some unaccompanied minors, previously criticised by the Commission and also by the judiciary,²⁶⁹ has been their placement in private residential facilities under special emergency arrangements. Such facilities have not been subject to HIQA inspections with staff who may not be sufficiently trained in child protection and trafficking risks and indicators.²⁷⁰

In 2025, HIQA found that Tusla had not adequately addressed concerns raised in a previous inspection of the capacity of the Separated Children Seeking International Protection team (SCSIP) Team in November 2023.²⁷¹ This was stated to be in part due to the increase in referrals SCSIP.

²⁶⁶Ombudsman for Children Office (2025), [Observations on the General Scheme of the International Protection Bill 2025](#), pp9 & 10.

²⁶⁷Irish Human Rights and Equality Commission (2025), [Observations on the General Scheme of the International Protection Bill 2025](#), p9.

²⁶⁸Irish Refugee Council (2024), [Briefing Paper to the Oireachtas Justice Committee Members on the EU Pact on Migration and Asylum](#), p4.

²⁶⁹The Irish Times, 4 November 2025, [Tusla's unregulated accommodation for asylum seeking children should be reviewed, court hears](#).

²⁷⁰Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p17.

²⁷¹Health Information and Quality Authority (2025), [Health Information and Quality Authority Regulation Directorate monitoring inspection of Child Protection and Welfare Services: Separated Children Seeking International Protection](#), p24.

The Ombudsman for Children Office has called for a prohibition on the placement of children in private and unregulated accommodation and for the imposition of a statutory duty for Tusla to ensure that there are sufficient appropriate placements for children, particularly young children.²⁷² The Office further supports additional resourcing for an extended mandate for HIQA to inspect such facilities.²⁷³

The inadequacy of special emergency arrangements was highlighted by RTÉ Investigates in 2026. The programme illustrated the negative experiences of vulnerable and at-risk children who were frequently moved around to different accommodation centres with a lack of appropriate support and services and referenced some experiences of exploitation.²⁷⁴

Tusla has reported working to address the use of SEAs through a variety of initiatives and a significant growth in regulated care services as a result, including in 2025, by opening Emergency Intake Units.²⁷⁵ These Units will form the new regulated care model response to all emergency accommodation for minors.²⁷⁶ Tusla has recently reported that it is ending its use of SEAs.²⁷⁷

The reliance on special emergency arrangements, as opposed to regulated centres, was raised as a concern by a number of stakeholders.

I'll be really straight; special emergency arrangements have no place in a care system. They are not placements. We have emergency foster care placements, we have emergency placements, so I don't know what these are, and I don't think they're legally sound. It's terrible, and it's our most vulnerable kids, kids who are so severely at risk.

– Stakeholder 17

²⁷²Ombudsman for Children Office (2026), [Let's Get it Right! A Rights-Based Vision for Children in Care](#), p37

²⁷³[ibid.](#)

²⁷⁴RTÉ Investigates, 22 April 2026, [Children in Care: one year following a system in crisis](#).

²⁷⁵Source: Tusla (2026).

²⁷⁶[ibid.](#)

²⁷⁷RTÉ, 9 July 2026, [Tusla ends use of special emergency arrangements](#)

Specialised accommodation

Ruhama, a specialised CSO supporting victims of TSE and prostitution, has identified deficiencies in housing for children of women who are victims of TSE noting that homelessness and inadequate and insecure housing places these women and their children at risk of further exploitation.²⁷⁸ The majority of migrant women victims of TSE and their children are housed in International Protection Accommodation Services (IPAS) facilities which are neither specialised, victim or child-centric, and not appropriate for victims of THB.²⁷⁹ The EU Reception Directive notes that victims of trafficking are likely to have special reception needs.²⁸⁰ The Immigrant Council of Ireland has also previously criticised the practice of placing women victims of sexual exploitation in IPAS accommodation, noting that some girls in the age assessment process have also been housed in these facilities.²⁸¹

The establishment of Rosa's Place, a dedicated centre for women who have been trafficked for sexual exploitation, funded by IPAS, was welcomed by a number of stakeholders but generally stakeholders felt that Ireland was not performing well as regards accommodation for adult and child victims. One stakeholder referenced Belgium's provision of three specialised reception centres for adult victims of trafficking,²⁸² with three similar accommodation centres operating for unaccompanied minors and child victims of trafficking where they have access to mentors (guardians) and legal and administrative support.²⁸³

Rosa's Place, it's a start, and it's a welcome start, but the likes of Belgium have three of those reception centres and have had them for the last two decades.

– Stakeholder 22

²⁷⁸ Health Information and Quality Authority (2025), [Health Information and Quality Authority Regulation Directorate monitoring inspection of Child Protection and Welfare Services: Separated Children Seeking International Protection](#), p21.

²⁷⁹ Ruhama (2025), Room for Recovery: Housing Hope After Exploitation, Comparing Models of Accommodation for Victims of Human Trafficking for Sexual Exploitation, p51.

²⁸⁰ [EU Reception Directive 2024/1346](#), Art 24(h).

²⁸¹ Immigrant Council of Ireland (2020), [Housing Trafficked Women in Ireland: Submission to the Advisory Group on the Provision of Support including Accommodation to Persons in the International Protection Process](#), p2.

²⁸² The Belgian adult reception centres of [Surya](#) (Wallonia), [PAG-ASA](#) (Brussels) and [Payoke](#) (Flanders) operate at varying bed capacity - Surya: 21, PAG-ASA 16-21 and PAYOKE 25-50.

²⁸³ Myria Belgian Federal Migration Centre, [Shelters for Victims](#).

Specialised services for child victims

The issue of accommodation and aftercare for child victims was spoken about by a number of stakeholders, particularly in relation to children who are ‘ageing out’ of services once they turn 18.

The majority of child victims, international protection applicants who were in the care of Tusla, some of them wouldn’t be entitled to aftercare, when they age out.

– Stakeholder 09

There is rightly a huge focus on Tusla with these children, unaccompanied minors, but there is an issue with the transition, what is happening then. There is also a huge population of young 18-year-olds going into direct provision. I just really would love to see the progress of the 18- to 21-year-olds who arrived unaccompanied being tracked. Because they are exactly the young people who, as they get older, may admit to the exploitation.

– Stakeholder 17

The Commission has also criticised the inadequate use of care orders and how special emergency arrangements have only provided children with accommodation, as opposed to other assistance.²⁸⁴ Timely access to legal aid, healthcare, education, family reunification and other services for all child victims of trafficking remain a serious concern. Difficulties surrounding the rights of migrant child victims to education, healthcare and family reunification were raised by a number of stakeholders. On the issue of access to healthcare, one stakeholder noted how they felt that better services were available for adult victims, via the HSE Anti-Human Trafficking Team, than child victims.

International good practice – Barnahus model for child victims

The Barnahus model (‘Children’s House’) is an integrated, child-centred approach to responding to child victims and witnesses of violence, exploitation and trafficking. The model was first developed in Iceland in 1998 and has since been adopted across many

²⁸⁴Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), pp242 & 244.

European countries, particularly in the Nordic countries and with a number of Barnahus in Ireland now established for child victims of sexual violence and abuse. It is increasingly recognised by the Council of Europe and other international bodies as an international good practice model for supporting child victims.

The central principle of Barnahus is that all key services involved in responding to violence against children are brought together in a single child-friendly environment, rather than requiring the child to interact with multiple institutions such as police stations, hospitals and courts. The model therefore promotes coordinated multi-disciplinary responses involving law enforcement, child protection services, medical professionals and psychologists and can provide both crisis support and longer-term therapeutic services.²⁸⁵

The Barnahus model is particularly relevant in cases of child trafficking and exploitation, where child victims have often experienced complex trauma and require coordinated responses across multiple agencies. By integrating investigative, protective and therapeutic services in a single setting, Barnahus helps ensure that children are treated primarily as victims while also strengthening the quality of evidence available for criminal investigations. A core feature of the model is the use of specialised forensic interviews conducted by trained professionals in child-friendly settings.²⁸⁶ As with the child specialist interviewer system in place in Ireland, these interviews are typically video-recorded and may be used as evidence in criminal proceedings, reducing the risk to children of re-traumatisation.

The Commission has recommended making the Barnahus model of multi-disciplinary supports available to all child victims of trafficking in Ireland, not just child victims of sexual abuse.²⁸⁷ There was strong support from stakeholders for more comprehensive and child-centred services to child victims of trafficking or exploitation and consistent reference to Barnahus as a successful model implemented across Europe and support

²⁸⁵ Council of the Baltic Sea States (2017), [PROMISE Barnahus Quality Standards](#), pp12-13.

²⁸⁶ [ibid](#) pp34-35.

²⁸⁷ Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p32.

for this model to be extended to all child victims of trafficking, as long as it was properly resourced.

The Barnahus model is extremely effective all across Europe. It may be the solution here too, but it is not currently the solution in operation. When we look at our models here in Ireland, I think we have three Barnahus. We have one physical Barnahus in Galway and the others are virtual. I remember last year being told that they had a remit of potentially a 100,000 children all from one centre on the outskirts of Galway. So it's just going to be a resourcing issue.

– Stakeholder 21

People are referencing Barnahus as a preferred model simply because it joins up the child protection with the criminal, health, and support pieces.

– Stakeholder 15

Another example of a successful local model for supporting child victims is the centre in Berlin which was established in 2024 and provides access to child protection specialists, and a range of multi-disciplinary supports and services.

International good practice – Centre for child victims in Berlin

In its chapter on Germany, the 2025 US Trafficking in Persons Report noted that a specialised child trafficking protection centre had been established by the Berlin State Government.²⁸⁸ The new centre, aimed at improving the early detection, identification and protection of child victims of THB, brings together professionals from youth services, justice system, educational institutions and schools, health services and other frontline public sector staff.²⁸⁹ The centre began operating in spring 2024 and is the first of its kind in Germany.²⁹⁰ During its first year, assistance was provided to more than 50 child victims of trafficking for sexual exploitation, forced begging, labour exploitation, forced marriage and criminal activity.²⁹¹ In the first nine months of 2025,

²⁸⁸US Department of State (2025), [2025 Trafficking in Persons Report: Germany](#).

²⁸⁹[ibid.](#)

²⁹⁰Berlin State Government, [Advice Center Fights Against Exploitation](#).

²⁹¹[ibid.](#)

the centre assisted more than 60 child victims of THB.²⁹² The Berlin State Government reports that children supported were of a range of ages, genders, and nationalities.²⁹³ The establishment of the specialised child trafficking unit²⁹⁴ has been praised by the German Institute for Human Rights, the Independent National Rapporteur, which highlights how such specialised counselling centres are important as they contain experts with knowledge on child trafficking and trafficking indicators, child protection risk assessments and the needs of child victims and who can advise the professionals on the ground.²⁹⁵ The UN Special Rapporteur on the sale, sexual exploitation and sexual abuse of children, has also described the centre as an example of good practice which should be replicated across Germany to provide child-centred support by focusing on early detection and identification of child victims and strengthening the collaboration between youth welfare services, criminal investigation and victim protection.²⁹⁶ The National Rapporteur has also described the centre as a good practice in improving the identification and protection of child victims, noting that, generally in Germany, often instances of THB are not reported and many victims are never detected and identified by police.²⁹⁷ This is particularly true of child victims of TCA, it notes, highlighting that many such child victims are incorrectly identified as criminals instead of as victims.²⁹⁸

Family reunification for unaccompanied minors

Regarding family reunification, one stakeholder noted how if the age assessment process incorrectly assessed unaccompanied minors as adults, they could be denied rights while in the legal process.

²⁹²German Institute for Human Rights (2025), [Factsheet on Trafficking in and Exploitation of Minors in Germany](#), p1.

²⁹³Berlin State Government, [Advice Center Fights Against Exploitation](#).

²⁹⁴IN VIA: Specialist Advice and Coordination Centre for Human Trafficking and Exploitation of Minors in Berlin.

²⁹⁵German Institute for Human Rights (2025), [Factsheet on Trafficking in and Exploitation of Minors in Germany](#), pp1 & 2.

²⁹⁶United Nations Human Rights Special Procedures (2024) Germany: [Special Rapporteur calls for consistent approach to child protection across the country](#), p7.

²⁹⁷German Institute for Human Rights (2025), [Factsheet on Trafficking in and Exploitation of Minors in Germany](#), p1.

²⁹⁸[ibid](#) p1 & 2.

Some decisions that Tusla made that a child was not eligible for their services, and upon appeal, how many were overturned? Because it's such a serious decision, because when States say you're not eligible for child services, then your family reunification rights, your education rights are all gone. You could wait six months for the appeal to discover that actually they got it wrong.

– Stakeholder 17

Other stakeholders noted how migrant child victims and unaccompanied minors needed supports from their home countries but also noted how care needed to be taken in relation to contacting their families, who may have been complicit in their trafficking.

When you're looking at international connectivity around child trafficking there are struggles in relation to family reunification where substantive information can't be guaranteed. Were the parents aware of the trafficking? Is it appropriate that the young person is reunited as this could result in it happening all over again.

– Stakeholder 07

National protocols

Another area of concern discussed by the Special Rapporteur on Child Protection, raised in the context of organised sexual exploitation of children in residential State care,²⁹⁹ and shared by the Commission, is the failure of Tusla to notify An Garda Síochána in a timely manner of the suspected abuse of unaccompanied minors who have gone missing from care.³⁰⁰ This is despite there being a specific response for children in cases with sexual exploitation as a concern under the Joint Working Protocol and Operation Cosnaím.³⁰¹ The need to review the Joint Working Protocol for child victims of sexual exploitation and for missing children was raised by a number of

²⁹⁹Special Rapporteur on Child Protection, Caoilfhionn Gallagher KC (2023) [Opening Statement to the Oireachtas Joint Committee on Children, Equality, Disability, Integration and Youth: Discussion on Child Protection](#), p6.

³⁰⁰Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p238.

³⁰¹ [Joint Working Protocol for An Garda Síochána/Tusla](#).

stakeholders with some noting a need to try to streamline protocols in relation to vulnerable children and child victims.

I guess what concerns me is that the missing from care thing is still coming up all the time. Tusla have a Joint Working Protocol with An Garda Síochána around sexual exploitation and are better trained in those red flags. But I'm still hearing these missing from care and exploitation concerns.

– Stakeholder 12

One stakeholder mentioned the need to improve national reporting protocols, highlighting the need for Government websites to be up to date and for some kind of emergency 24-hour hotline to be created to allow victims to get support or advice outside of contacting An Garda Síochána.

There are no defined spaces or a defined office where you can go and say these people are responsible for this. You know, you call the Garda or Tusla but often you are sent all over the place. Some places if you call after 6pm, you can't even get anybody to speak to at all. Even the Department of Justice, on Blue Blindfold some phone numbers are not working, some emails nobody responds to. We need, like, a national helpline. It could be under Cuan, but it must be a number that you can call any time of the day, and there will be somebody, not an answering machine, there'll be somebody on the other end.

– Stakeholder 14

Trafficking indicator and risk assessments

Other areas of concern, raised in previous years by the Commission, in regard to Tusla processes and procedures have been: inadequate and delayed Intake Eligibility Assessments (IEA) for referrals from the International Protection Office; an incorrect definition of child trafficking used in the Risk Assessment Matrix on Separated Children at Risk of Trafficking screening process; and the need for trafficking-specific procedures.³⁰² HIQA has also previously noted similar concerns noting that many IEAs

³⁰²Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p240 & 241.

did not routinely screen for risk of trafficking and exploitation; that safety planning was not routinely conducted when a trafficking risk was identified; that these cases were incorrectly classified as medium, as opposed to high risk; and that there was inadequate follow up with other jurisdictions when children identified as being at risk of trafficking went missing from care.³⁰³ The need for screening for child trafficking indicators and comprehensive vulnerability assessments for children, particularly in relation to unaccompanied minors in the international protection process when the Pact is implemented, was mentioned by a number of stakeholders.

Now, as I understand from Tusla, they will do an assessment of a child, and if a child has specific vulnerabilities and they do need to be taken into State care and are allocated a social worker. But we also have real concerns about the vulnerability assessment in relation to reception conditions: one of the critical ways that Ireland has advised that they're going to try and identify trafficking and child trafficking.

– Stakeholder 17

Allocation of social workers

The Commission has also previously noted failures by Tusla to allocate unaccompanied minors a social worker,³⁰⁴ with HIQA's most recent inspection noting that problems persist regarding allocations of social workers and waiting times for social workers.³⁰⁵ The Commission has acknowledged the staffing pressures on Tusla and has called for increased resources to be made available by the Minister. Tusla must fulfil its statutory duties, expanded under the new NRM, towards all at-risk children who do not have access to a parent or guardian.³⁰⁶ The Commission has also noted that it is not clear

³⁰³Health Information and Quality Authority (2025), [Health Information and Quality Authority Regulation Directorate monitoring inspection of Child Protection and Welfare Services: Separated Children Seeking International Protection](#), p32, 33, 36 & 42.

³⁰⁴Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p17 & 18.

³⁰⁵Health Information and Quality Authority (2025), [Health Information and Quality Authority Regulation Directorate monitoring inspection of Child Protection and Welfare Services: Separated Children Seeking International Protection](#), p27 & 35.

³⁰⁶[ibid](#), p205.

whether all identified child victims of trafficking are being allocated a social worker. The support of a social worker is critical for child victims during investigations and prosecutions.³⁰⁷ It appears from stakeholder interviews that all identified child victims, and unaccompanied minors, are not being allocated a social worker immediately, with some expressing serious concerns as to how this is hampering the protection needs and access to services and legal advice of child victims.

There's a question of a drop in the standards. We used to be the best in Europe. We used to have every child that came in got allocated a social worker, it didn't matter about their age. That is not happening now, it's just accommodation only. It's not good enough, the watering down of the standards for unaccompanied minors.

– Stakeholder 17

I understand that the Separated Children's Team in Tusla is under a lot of pressure but, especially when they're aware that a child has been identified as a potential victim of trafficking, that doesn't seem to trigger any prioritisation that I can see.

– Stakeholder 09

Some stakeholders highlighted how, particularly in relation to migrant children, that culturally competent social workers were needed with others saying that they were not sure if a social worker was needed or if other suitably trained professionals such as some kind of child advocate could provide support to child victims, particularly in the context of the current shortages of social workers.

The specific social worker that the child can have access to is very important. Properly trained professionals, but also trauma-informed and culturally sensitive. Tusla are doing their best, but I feel that the whole structure and organisation needs to be totally overhauled.

– Stakeholder 14

³⁰⁷Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p246.

The need for child victims and at-risk children to have access to a social worker and a range of therapeutic and psychological supports was highlighted as key to their long-term recovery, to prevent re-victimisation and re-trafficking and to build trust.

They need to have time to build rapport with their key person, that stable relationship with a trusted professional in whom they could confide concerns they have.

– Stakeholder 12

Personally I think it should be therapeutic intervention. Children who have experienced such depths of trauma and without access to appropriate mental health services and support and therapeutic intervention. That has to be the first. It has to be the welfare of the child and whether that counsellor or psychologist is the one good person in the child's life.

– Stakeholder 08

Prosecution

Investigations

Investigations into THB and child trafficking are supported by³⁰⁸ or conducted by the Human Trafficking Investigation and Coordination Unit (HTICU), a division of the Garda National Protective Services Bureau which also has a specialised unit established to investigate the commercial sex trade which includes victims of TSE. The US Department of State reported that 67 new investigations into THB were commenced in 2024, compared to 53 in 2023.³⁰⁹ However, there is no information as to how many, or if any, of these investigations relate to child trafficking and ICT-facilitated child trafficking.

³⁰⁸In many instances the HTICU support the work of local detectives by acting as a focal point to local investigations.

³⁰⁹US Department of State (2025) [2025 Trafficking in Persons Report: Ireland](#).

Complexity of human trafficking investigations

Stakeholders with knowledge of trafficking investigations and prosecutions stressed how challenging these investigations can be to conduct given the organised nature of the crime and that the investigations are often multi-jurisdictional.

It's exceptionally complex, and very difficult. To be identified as a victim of trafficking, that exploitation doesn't have to have happened in Ireland, and actually, frequently, it may not have happened in Ireland, it may have happened in another jurisdiction. So that might be another piece or another complexity.

– Stakeholder 01

Stakeholders listed a range of difficulties in obtaining information and evidence from other jurisdictions hampering investigations and the chance of a subsequent prosecution. One issue highlighted was when victims were in the international protection process as this meant that their home countries could not be contacted as this could pose a danger to the victim.

Somebody tells you that they were exploited in a country. They've claimed asylum, so you can't go and check with their home country, because you're identifying what country they're now in. And then you can't get supporting evidence, you can't go back to that country, and you can't build a case. So when there's an allegation there, it's enough to get them into the national referral system but it's not enough to get anywhere near the potential prosecution.

– Stakeholder 22

Delays in cross-border information sharing and evidence

Even where victims could give accounts of where they had been trafficked from and through, obtaining evidence in a timely fashion was hampered by lengthy and cumbersome Mutual Legal Assistance (MLA)³¹⁰ procedures in place until Ireland opts into a number of EU Directives in relation to evidence sharing, such as the European Production Order and European Investigation Order.

³¹⁰Current procedures for obtaining evidence from other jurisdictions is via procedures in the [Criminal Justice \(Mutual Assistance\) Act 2008](#).

The slow MLA process was also cited as a barrier to securing ICT evidence from large technology companies posing a major barrier to investigations.

Trying to get data from you know, a lot of the data you'd be wanting. Think we have seven of the big tech companies. Trying to get data from Google or Gmail or any of these accounts. Honestly, it can take two years. Other EU countries cannot understand it. Within an EIO, they will send an EIO to another country, and within 24 hours, they have the information.

– Stakeholder 13

Need for resources and experienced personnel

Resources and experienced personnel were highlighted as key issues for investigations.

Investigations require resources, both financial and human resources. And we know from our own experience that the trafficking field has always been under-resourced. Every country needs more resources to be dedicated to these fields, both from the law enforcement perspective, but also social elements of it, like protection and identification.

– Stakeholder 10

The benefit of experienced personnel and Joint Investigation Teams (JITs) coordinated by Eurojust was identified as a key positive development in human trafficking investigations. Eurojust³¹¹ brings national authorities together, facilitating meetings and assisting with practice and legal issues that arise during an investigation. JIT meetings provide an opportunity for those involved to develop working relationships, discuss issues directly and gain a better understanding of the different approaches in each jurisdiction. This can assist in addressing any difficulties and avoiding misunderstandings during an investigation.

However, a particular issue was raised by a number of stakeholders in relation to Ireland's participation in JITs. While evidence obtained through a JIT can normally be used by Member States, until Ireland opts into the necessary EU Directives, this does

³¹¹ Eurojust, [European Union Agency for Criminal Justice Cooperation](#).

not apply to material provided by Ireland. MLAs are required to ensure material obtained from Ireland is admissible as evidence in court.

Even if we did have a JIT, which I know Ireland has done, we sometimes don't automatically benefit. Other countries are saying, well, that's great, you got the information. But we can only use that information for intelligence. We can't use it for evidence like you can in France or Germany. We then have to do an MLA to get the same information.

– Stakeholder 20

ICT-facilitated trafficking

Having appropriately trained investigators was viewed as particularly important in combatting ICT-facilitated trafficking, a rapidly evolving threat. The OSCE has noted that an additional difficulty for investigations into ICT-facilitated child trafficking is the ability for traffickers to more easily avoid detection, through the use of ICT-facilitated trafficking and generative AI – particularly so when they may never need to physically meet the victim.³¹² The difficulties in detecting online trafficking subsequently makes prosecutions more complex so there is a need for governments and law enforcement, says the OSCE, to research how traffickers are using generative AI and for discussions around AI and online safety and governance to fully consider the risks of AI-enabled THB.³¹³

Stakeholders stressed that Europe was not as advanced as the US and that these ICT-facilitated trafficking investigations require inter-disciplinary cooperation between national and international policing units, particularly between those with human trafficking and cybercrime expertise, with practice examples being identified in the Netherlands and Ukraine.

In some countries, like the United States, technology-facilitated trafficking...They've been dealing with that for years and they had the

³¹² Organization for Security and Cooperation in Europe (2024), [Policy action to address technology-facilitated trafficking in human beings Report of the regional consultations led in 2023 by the OSCE's Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings](#), p7.

³¹³ Organization for Cooperation and Security in Europe (2024), [New Frontiers: The Use of Generative Artificial Intelligence to Facilitate Trafficking In Persons, Policy Brief, November 2024](#), p6.

infrastructure already kind of built. The Netherlands is a good example based on the fact that they were able to bring the cyber capabilities to anti-trafficking, joining the cybercrime unit and the trafficking unit. Human trafficking specialists traditionally would not have those cyber capabilities. Ukraine has also been working a lot in relation to the technology angle of human trafficking, building their cyber capabilities. No countries are doing fantastically well because this is a phenomenon across Europe that is relatively new. Now countries are building those capabilities. They're trying to leverage the power of technology, whether purchasing the tools, for example, web crawlers³¹⁴ that are used by the Dutch. They have their own web crawlers, but of course there are lots of commercial ones.

– Stakeholder 10

A number of stakeholders highlighted how the approach to human trafficking investigations in Ireland has changed in recent years, noting various forms of national good practice. One key area was how increased levels of specialisation of investigators and prosecutors and structured processes between An Garda Síochána and the Office of the Director of Public Prosecutions over the past five years have delivered efficiencies and improved the law enforcement response to trafficking.

Stakeholders also referenced the increased use of organised crime legislation and other legislation noting how the majority of human trafficking was carried out by organised crime groups (OCGs) and carried out with the purpose of making a profit.

And absolutely, without a shadow of a doubt, human trafficking is OCG related.

– Stakeholder 13

Using organised crime legislation in human trafficking investigations was viewed by some stakeholders as an important national practice for a number of reasons. It “follows the money trail”, the evidence of which would strongly support prosecutions and was often easier to prove and allowed suspects to be held longer for questioning. It

³¹⁴Web crawlers are automated software programmes that systematically browse the internet to discover, scan, and download content from webpages.

also provides benefits at prosecution stage as this legislation does not require victim testimony.

The fact that they were leaders of an organised crime group, facilitating or enhancing the capabilities of an organised crime group allows for their arrest on suspicion of those offences but also to detain them for a longer period and question them about it. What is the organised crime offence? It's human trafficking, but it's not just human trafficking, it's organised prostitution, it's all the ancillary offences that go with it, and there's loads of them. Money laundering is a big one, so follow the money. They only do this for one reason, and one reason only, which is to make money out of it.

– Stakeholder 06

An alternative approach, which has been very, very successful but often doesn't result in a human trafficking conviction, it can result in a human trafficking investigation. You look at that, let's just say it's a child. So that child is possibly from another country. Three or more people is all that's required to form an organised crime group, which is an easy number to get with. They don't have to be resident in Ireland. So you can have a recruiter, you can have somebody who transported them to Ireland. You can have somebody who is out there, looking after them, you have somebody who's moving them on a weekly basis.

– Stakeholder 22

Early legal assistance

The US Department of State stresses the importance of early quality legal assistance and that the State should make this available at the earliest opportunity, before engagement with An Garda Síochána.³¹⁵ Early access to legal assistance, both counselling and representation, should be provided pursuant to the Directive³¹⁶ and is particularly important for child victims. Research conducted for the then Policing

³¹⁵US Department of State (2025) [2025 Trafficking in Persons Report: Ireland](#).

³¹⁶ [Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims](#), Art 15(2).

Authority shows that children frequently waive their right to legal representation and that their age, lack of understanding and stress during interviews can lead to them making false or unreliable statements.³¹⁷ Some stakeholders expressed concerns that some child victims were not getting early and timely access to legal advice, noting that the reported number of child referrals to the Legal Aid Board (LAB) was lower than the number of officially identified child victims raising concerns that children might not be receiving legal advice prior to any cooperation with criminal investigations. LAB can provide legal advice to child victims at any stage, including before they have been identified by An Garda Síochána.

The bar for referral is quite low, so it should be happening at a very early stage.

– Stakeholder 09

Current procedures for child victims involve the Legal Aid Board liaising with the child's Tusla social worker who would be present at any consultation. Legal advice and support are available to child victims of trafficking who are unaccompanied minors, via CSOs such as the Irish Refugee Council³¹⁸ and the Immigrant Council of Ireland.³¹⁹ LAB has recently set up a pathway with the Irish Refugee Council (IRC) to provide early legal advice to child victims. If IRC caseworkers identify trafficking indicators while working with unaccompanied minors or children seeking international protection, they refer these children directly to LAB. LAB then refer to An Garda Síochána for assessment, if Tusla have not already done so.³²⁰

The Commission has noted that there is no obligation on Tusla to seek legal aid for child victims. There is also no child-specific enhanced legal assistance or assistance available to the families of child victims.³²¹

The Commission has recommended a system of child legal advisers.³²²

³¹⁷Policing Authority & University College Cork (2020), [Children's Rights and Police Questioning: A Qualitative Study of Children's Experiences of Being Interviewed by the Garda Síochána](#), p19.

³¹⁸Irish Refugee Council, [Independent Law Centre](#). [website accessed 16.06.2026].

³¹⁹Immigrant Council of Ireland, [Child Migration Matters](#). [website accessed 16.06.2026].

³²⁰Source: Legal Aid Board (2026).

³²¹Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), pp155 & 156.

³²²[ibid.](#) p155.

The majority report of the Review Group of the Civil Legal Aid Scheme recognises the role of LAB in providing legal services to victims of THB and recommends an expanded role for LAB in delivering public information and outreach.³²³ The minority report recommends the proper resourcing of all independent and community law centres including legal representation and advice for victims of trafficking, in addition to proper resourcing of services such as the Irish Refugee Council and Immigrant Council of Ireland to deliver new and targeted specialised legal services with priority given to services for specific cohorts including victims of THB.³²⁴

National good practice – child specialist interviewers

The Policing Authority research notes that generally when interviewing child witnesses and victims as opposed to suspects, highly trained child specialist interviewers are used,³²⁵ a practice that commenced with the establishment of a specialised interviewing programme by An Garda Síochána in 2008,³²⁶ and which now includes some Tusla staff. The use of child specialist interviewers was highlighted by many stakeholders as an example of good practice with some noting that this was particularly important for any investigations into child trafficking where victim cooperation is key, given the need for their testimony at any future trial.

There's an awful lot more branches to human trafficking. You're looking after the victim as well as trying to get their trust and build rapport.... they're not going to come in and say everything in one statement. That could take 10 statements. Children have to have the child specialist interviewer, which is another expertise that has to be added to the investigation.

– Stakeholder 06

³²³Civil Legal Aid Review Group (2025), [Civil Legal Aid Review 2025: A Review of the Civil Legal Aid Scheme in Ireland, Final Report and Recommendations to the Minister for Justice from the Majority of Civil Legal Aid Review Group on the Future of the Civil Legal Aid Scheme](#), p39.

³²⁴Civil Legal Aid Review Group (2025), [Civil Legal Aid Review 2025: A Review of the Civil Legal Aid Scheme in Ireland, Report and Recommendations of the Minority of the Review Group](#), XIV.

³²⁵ Policing Authority & University College Cork (2020), [Children's Rights and Police Questioning: A Qualitative Study of Children's Experiences of Being Interviewed by the Garda Síochána](#), p99.

³²⁶Minister for Justice, Helen McEntee TD, [Parliamentary Question 477, 30 November 2021](#).

I know the child specialist interviewers are very good. Children must have the child specialist interviewer, as when you're interviewing the children it takes time to build trust and rapport. You need the child to engage with you, first of all, and then, ultimately, if there is a trial, you need them to give evidence, which can be very harrowing and very difficult on them, given the nature of the circumstances.

– Stakeholder 22

I think there's a stronger emphasis now on victim protections in the investigation and prosecution, victim-centred interviewing and practical training on child interviewing that is quite well done in Ireland.

– Stakeholder 13

Additional legal supports for child victims

To ensure support for child victims throughout the criminal justice process the Commission has recommended the introduction of an 'appropriate adult scheme' similar to that in the UK, in addition to the appointment of child legal advisers when victims enter the NRM.³²⁷ The Commission has previously recommended introducing Trafficking and Exploitation Risk Orders and Trafficking and Exploitation Protection Orders, which could protect children during investigations and prosecutions given that victims are often concerned about reprisals against them and family members.³²⁸ The OCO believes, in relation to unaccompanied minors specifically, that the State should introduce a professionally qualified guardianship model, independent of a Tusla appointed social worker³²⁹ which could support child victims.

³²⁷Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p30.

³²⁸ Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p182.

³²⁹Ombudsman for Children Office (2025), [Observations on the General Scheme of the International Protection Bill 2025](#), p9.

Prosecutions

The low number of prosecution and convictions for THB is criticised by the US Department of State, which also notes the conviction of suspected traffickers for other offences such as money laundering and rape.³³⁰ Prosecutions for child trafficking are rare in Ireland which could partially be explained due to the reclassification of child TSE offences in 2017 by the Office of the Director of Public Prosecutions as offences of sexual exploitation only.³³¹ However, in 2023 charges were brought for child TLE for the first time and in 2024 the Office of the Director of Public Prosecutions secured a conviction for child TSE.³³²

Convictions for trafficking-related offences

The issue of securing convictions for trafficking-related offences for children was raised by a number of stakeholders while recognising the complexity of these investigations.³³³ They acknowledged international criticism due to low numbers of convictions but noted that while trafficking-related offences may carry lighter sentences in some instances, considered securing some form of conviction was better than none and that the evidential bar for prosecuting child trafficking was very high so many human trafficking investigations did not result in human trafficking prosecutions. Some stakeholders criticised the fact that child trafficking offences relating to sexual exploitation were referenced in separate legislation, however one stakeholder described how trafficking-adjacent offences and organised crime legislation were part of a ‘toolbox’ that could be used to investigate and prosecute human trafficking and the exploitation of children.

In previous years, the attitude had been that they didn’t want to hear about convictions if they weren’t human trafficking convictions. Now, the attitude seems to have maybe shifted a bit more, and there’s more of an understanding

³³⁰ US Department of State (2025) [2025 Trafficking in Persons Report: Ireland](#).

³³¹ Economic and Social Research Institute (2022), ESRI Research Series Number 139: Detection, Identification and Protection of Third-Country National Victims of Human Trafficking in Ireland, p16.

³³² Irish Human Rights and Equality Commission (2025), [Ireland’s Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), pp164 & 165.

³³³ See also 5.3.1 Investigations: Complexity of Human Trafficking Investigations.

that convictions for an organised crime type of offence is still a good result, it's better than no convictions at all.

– Stakeholder 04

You have some legislation, certainly around prostitution and organised crime, organising prostitution, brothel keeping, if you're talking particularly about prostitution. We have some of those offences that are kind of now being described as sort of 'trafficking-adjacent' crimes. I can see the sense in using other legislation for prosecution and at least we're getting some justice and doing some both punishment and deterrence, removing bad actors, and seizing funds and all of that.

– Stakeholder 12

Legal definitions of child trafficking – means element and forced criminality

The Commission has recommended that to better protect child victims, the Children First Act 2015 should be amended to include all forms of child trafficking not just TSE and that the Criminal Law (Human Trafficking) Act 2008 (as amended) should include child TSE.³³⁴ While the Children First accompanying guidance was updated in 2019 to recognise digital/online harms,³³⁵ there is no effective guidance in relation to how to deal with such digital harm.

One key issue arose around definitions included in the Criminal Law (Human Trafficking) Act 2008, as amended, and the legal definition of child trafficking. Although no means element is required in child trafficking offences, some stakeholders noted that the means element of 'force' was required under Irish legislation in relation to trafficking for criminal exploitation as the offence is 'forced criminality',³³⁶ a term used

³³⁴Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), pp17 & 134.

³³⁵ Department of Children and Youth Affairs (2019) [Addendum to Children First: National Guidance for the Protection and Welfare of Children, Online Safety](#).

³³⁶[Criminal Justice \(Human Trafficking\) \(Amendment\) Act 2013](#), s1(a)(d)'exploitation consisting of forcing a person to engage in (i) an activity that constitutes an offence and that is engaged in for financial gain or that by implication is engaged in for financial gain, or (ii) an activity in a place other than the State that (I) constitutes an offence under the law of that place and would, if done in the State, constitute an offence, and (II) is engaged in for financial gain or that by implication is engaged in for financial gain;'.³³⁶

by all stakeholders involved in law enforcement. This Act also makes reference to ‘forced labour’.³³⁷ These references pose clear difficulties for child trafficking investigations and prosecutions for criminal and labour exploitation.

The human trafficking offence for a child doesn’t require means so they don’t need to be ‘forced’ like an adult. For the reason being, generally children are accepted as vulnerable in the first place. So you don’t have that means requirement, but the actual offence from the Trafficking Act still has the act of forced criminality. It’s in the legislation. So, even though you don’t need that means element, it’s still there in the Act so it might be more difficult to prove or to get a conviction over the line for human trafficking in those cases where the child is willing to engage. So that might be the sort of scenario where the Engagement of Children in Criminal Activity Act 2024 would be useful as it doesn’t require force. It is just you’ve groomed, tried to engage or engaged the child in the criminal activity.

– Stakeholder 04

Requirement for child victim testimony

Additional difficulties in securing convictions for THB, which are more pronounced in child trafficking cases, is the statutory requirement for victims’ testimony and the heavy reliance on this in prosecutions.³³⁸ This key difficulty was highlighted by many stakeholders. This highlights the need for child specialist interviewers where, according to the lead prosecutor in *DPP v Edosa & Enoghaghase*,³³⁹ trust needs to be established with victims to gain a full and detailed statement to assist the investigation process and secure corroborating evidence for the subsequent prosecution.³⁴⁰

³³⁷[Ibid](#), s 1(a)(c) ‘forced labour’ means a work or service which is exacted from a person under the menace of any penalty and for which the person has not offered himself or herself voluntarily.

³³⁸Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p182.

³³⁹[DPP v Edosa & Enoghaghase \[2023\] IECA 38](#).

³⁴⁰Murphy, F, Office of the Director of Public Prosecutions (2021), [Prosecuting Human Trafficking Offences](#), p7.

In some jurisdictions, you can do victimless prosecutions, where they can get human trafficking investigations and prosecutions without a victim giving testimony. To secure a trafficking conviction here, we need the testimony of the victim, that he or she was trafficked and what happened to them, and that's an essential proof, because when you're accusing someone, you have to sit in front of them and say that in court.

– Stakeholder 06

One stakeholder cited good practice in the UK, another common law jurisdiction, in securing 'county lines' prosecutions without needing to rely on child victims' testimony by using ICT evidence, highlighting the increasing importance of collecting ICT evidence to secure successful prosecutions.

They'd see these kids with really expensive runners, etc, this would be a telltale sign of criminal exploitation. Those children are never going to give evidence against the adult gangs so how do you prosecute? What they did is they broke the communication. So they used the electronic communication, their phone, and they proved that their phones were in contact with the organisers, and they used the circumstantial evidence of their phones, not through the children themselves being willing witnesses. So, they had effectively a victimless prosecution that they could do, because of the accumulation of all the telephone evidence and the other type of evidence that was developing. And they could prove beyond a reasonable doubt in the UK that the adults were coercing and controlling and directing the children to commit criminality on their behalf.

– Stakeholder 20

Statutory defence - non-prosecution principle

The Commission has also noted the need for a statutory defence for victims so they are not prosecuted for crimes they committed as a result of their exploitation.³⁴¹ Currently, the decision on whether to apply the non-punishment principle is an administrative

³⁴¹Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p134.

decision by the Office of the Director of Public Prosecutions under the Guidelines for Prosecutors.³⁴² The application of the non-punishment principle and the need for a statutory defence is particularly important for children who are victims of TCA, whereby the express exploitation is to commit crimes. It is also particularly important for child victims of TSE, where the UNODC recognises the practice of traffickers forcing women and girls to commit crimes and using them in low-level roles where they attract police attention³⁴³ and where the involvement in criminal activity then affects assessment of their credibility as a witness at trial.³⁴⁴

Stakeholders had different perspectives on aspects of a statutory non-punishment principle for victims of trafficking. One stakeholder felt that a statutory non-punishment principle which mandated discretion was needed, but that it would not be a blanket provision and would be applied after a review of the case through a trafficking lens.

The Non-Prosecution Principle needs to be part of the legislation. It cannot be just a discretionary order for the prosecutors. It should be mandatory discretion, not just voluntary discretion. Of course we're not talking about the blanket application of the non-punishment principle. It should be applied to all levels of offences, which means a thorough review of the case from the trafficking lens, and if it's a minor, that child protection agencies would be involved.

– Stakeholder 10

One stakeholder made reference to a lack of practical benefit for British and Northern Irish child victims as to the statutory non-punishment principle conferred via entry into the NRM and a successful conclusive grounds decision. The same stakeholder doubted whether child victims of criminal exploitation would avail of this due to fear of reprisals from organised crime and paramilitaries respectively and repercussions for them and their family from them being seen as a “snitch”.

Another stakeholder noted how the UK, by including statutory provisions, had actually made things more difficult as they needed to then legislate for a large number of

³⁴²Office of the Director of Public Prosecutions (2019), [Guidelines for Prosecutors](#), para 4.7.

³⁴³United Nations Office on Drugs and Crime (2020), [Female victims of trafficking for sexual exploitation as defendants](#), p28.

³⁴⁴Murphy, F, Office of the Director of Public Prosecutions (2021), [Prosecuting Human Trafficking Offences](#), p7.

separate statutory exceptions. The same stakeholder also noted the need for formal and conclusive identification as a victim of trafficking before the statutory non-punishment principle could be availed of and that in the Irish system this was not necessary for prosecutors to apply their discretion.

Review of convictions for child victims of criminal exploitation

The non-prosecution of child victims of trafficking for criminal exploitation was raised by many stakeholders. Many felt that some form of review for trafficking indicators should be conducted of the cases of children convicted of committing criminal offences, particularly in relation to drug dealing. Such a review could involve looking at the child's circumstances and background by child protection professionals using a trafficking lens.

You could have kids selling drugs under duress, but they're investigated under the Misuse of Drugs Act. So there could be an organised element there. In essence, it could meet the criteria for being human trafficking for forced criminality. They may never be viewed or assessed as victims of human trafficking for forced criminality. If we had the resources and we had to look at all those cases where the children were selling drugs, and examine that from a human trafficking standpoint, they could have been convicted in the wrong. For example, if a child psychologist was to assess them and say, these are very vulnerable children, and they were prone to exploitation. And as we all know, that's what criminals do. They get the younger people because there are benefits to be gotten if you're a juvenile and arrested, you're going to avail of the juvenile liaison diversion system. And so they are being exploited by drug gangs.

– Stakeholder 22

Some stakeholders noted how prosecuting these children meant that the real criminals were continuing to act with impunity and recruit more children. Others considered that even if they were engaged in youth diversion programmes, such children were at least getting those supports and services and that being designated as a victim of trafficking in Ireland may not confer any benefit on a child who was engaged in such programmes in their community and being provided with psychological supports.

By prosecuting children, we're actually perpetuating impunity, because the real perpetrators behind them are not being prosecuted. So they continue doing what they're doing, they're recruiting more children.

– Stakeholder 10

Supports during criminal trials

The appointment of child legal advisers would support existing protections for children in criminal proceedings provided for under the Criminal Justice (Victims of Crime) Act 2017. Age-appropriate, child-centric and specialised support could also be enhanced via training of prosecutors and the judiciary to ensure child victims of trafficking are protected during proceedings. Child victims can avail of accompaniment services such as those provided by Victim Support at Court.³⁴⁵

National good practice – special measures for children

Children are automatically entitled to a range of special measures (including at investigation stage) during criminal trials under the Criminal Justice (Victims of Crime) Act 2017.³⁴⁶ The effectiveness of recent measures in supporting child victims were raised by a number of stakeholders, particularly those which reduced the burden on children's testimony. One example provided was how when child victims were being interviewed by child specialist interviewers, they would also be interviewed by the prosecution which removes the need for an examination in chief at trial. The Commission has welcomed the recent establishment of an intermediary system, which can assess needs in advance of a trial and assist with communication between the child, prosecution and court.³⁴⁷ This development, and other measures to support children, was praised by one stakeholder as greatly improving the trial process for child victims. They explained that intermediaries were an officer of the court whose role it was to facilitate communication with the child witness and how they would be provided with the questions for the child in advance. Then at the ground rules hearing at the start

³⁴⁵Victim Support at Court (V-SAC) (2021), [Child Safeguarding Statement](#).

³⁴⁶[Criminal Justice \(Victims of Crime\) Act 2017](#).

³⁴⁷ Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p184.

of the trial the judge will decide which special measures would be allowed to be used at trial. Such measures could be flash cards or in the case of a young child a doll could be used for anatomical explanations. This stakeholder noted how there was also potential to use intermediaries when children were reporting a crime in a Garda Station.

Re-traumatisation of child victims at trial

A number of stakeholders highlighted how the common law adversarial system was deeply traumatising for any victim, but that for children it was very deeply traumatic. Given that child trafficking cases rely so heavily on the victim's statements and testimony, some stakeholders suggested that it might be preferable for children if convictions were secured under other offences, such as organised crime or money laundering legislation where possible to avoid the need for the child to testify.

The real negative for our system is, and not much can be done without a change of legislation, is that victims have to give evidence. That's the most difficult part, given they're the most vulnerable people you're going to have in your court system. Despite having the best social workers, the best Garda liaison officers, the best psychologists, it's still a very lonely place when you have to give your evidence on your own. It's very difficult for a child to feel safe in that environment. You really have to factor in what's best for the child. Can we get convictions elsewhere? Can we save them a huge trauma by not having to give evidence? The best outcome for a child is to not have to give evidence. The child might have suffered so much trauma already and the State systems only put them back into absolute further re-traumatisation.

– Stakeholder 22

Our system is essentially re-victimisation. That does not happen in European countries. They make their statement, and that is part of the evidence on the file. The judge reads that statement; there is no more cross-examination... Before the trial started, all of the family, the mother, the father, the children, the brothers and sisters, got to give their story about the child. They got to say what the impact of this crime had had on them. And then the case began. So they had

their victim impact statement beforehand. Even if the defendant wasn't convicted, they still got to say something. And that touched me, because in Ireland, no matter what happens, if you're convicted, great. But if you're not, you've been put through that trauma...the poor children, you know, they might be without parents, it's really traumatic, and yet they don't get to tell anyone how they felt about it.

– Stakeholder 13

International good practice – civil law jurisdictions

A number of good practice examples were given in relation to how investigations and trials were conducted in civil law jurisdictions which reduced the chance of re-traumatisation of the victim and supported their recovery, either by reducing their involvement at trial or allowing for written testimony or victim impact statements to be read out by judges at the start of proceedings. One stakeholder highlighted a Belgian trafficking case they were aware of where the victim was living in Ireland. They spoke of how the judge, prosecutor and defence counsel travelled to Ireland to collect the testimony. They provided the questions to a Garda member who then conducted and recorded the interview which was observed by the judge, prosecution and defence all of whom were given the opportunity to ask more questions. It was this evidence that was then presented at a trial so the victim was not required to attend the trial.

Compensation

The difficulties for victims of THB accessing compensation for their suffering are considered extensively by GRETA in its third report monitoring the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings in Ireland.³⁴⁸ It recommended the establishment of a special compensation fund for victims of THB, funded by the assets confiscated from perpetrators.³⁴⁹ This is supported by the Commission which recommends that proceeds from seizure and confiscation

³⁴⁸Council of Europe (2022), [GRETA Third Evaluation Report: Ireland](#), paras 67-88.

³⁴⁹[ibid](#), para 88.

orders be ring-fenced and used to establish a ‘Victims of Trafficking Fund’ to provide compensation and THB-related social supports and assistance to victims.³⁵⁰

The Law Reform Commission notes there is a legally binding obligation on EU Member States to ensure that all criminal and civil national compensation schemes and legal advice are available to victims of THB which includes legal advice on accessing compensation.³⁵¹ However, in relation to child victims, the law centre ‘Community Law and Mediation’³⁵² highlights how, when there is a conflict of interest between the child’s parents and the child or where a child is in care or an unaccompanied minor, in the absence of any legal provision whereby a child can institute civil proceedings poses a real barrier to accessing justice,³⁵³ and in turn, access to compensation.

Inadequacy of compensation mechanisms for victims

The issue of compensation for THB victims, including child victims, was raised by a number of stakeholders. They stressed the inadequacy of current avenues in Ireland and a lack of understanding and awareness, even within the legal profession and judiciary, of compensation for victims of crime and using asset tracing as a means to secure funds for compensation.

³⁵⁰Irish Human Rights and Equality Commission (2025), [Ireland’s Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p186.

³⁵¹Law Reform Commission (2022), [Consultation Paper: Compensating Victims of Crime, LRC CP 67–2022](#), para 4.33.

³⁵² ‘Community Law & Mediation’ (CLM) is an independent community law centre and charity. working since 1975 with communities impacted by disadvantage and inequality.’ Community Law and Mediation (2025), [The Unmet Legal Needs of Children and Young People in Ireland and Enhancing Access to Justice: A Children’s Rights Analysis](#), p2.

³⁵³Community Law and Mediation (2025), [The Unmet Legal Needs of Children and Young People in Ireland and Enhancing Access to Justice: A Children’s Rights Analysis](#), pp53 & 54.

It's just appalling, appalling, there's no compensation. There is none, forget it. I don't think people are even thinking about compensation. It's not on anybody's radar. Even our compensation provisions themselves, you've got to get onto the Criminal Injuries Compensation Committee, you have to do that within two years. At this point people don't even know how to do this, and then, honestly, it is a palaver and a half trying to get any kind of money out of them.

– Stakeholder 13

One stakeholder highlighted how the Criminal Injuries Compensation Scheme was restricted to out-of-pocket expenses and also that there was a lack of clarity on who should make the application noting that LAB is not permitted to represent clients before the Criminal Injuries Compensation Tribunal under the current civil legal aid legislation. Another stakeholder noted how, while there may be better systems in place in other jurisdictions, many EU Member States seemed reluctant to properly address compensation and that disagreements surrounding compensation had held up the new Victims' Rights Directive at EU level.

The Commission has previously noted that Ireland is an outlier internationally as victims did not have access to compensation for 'pain and suffering'.³⁵⁴ Compensation for pain and suffering for victims of crime in Ireland was recently addressed by the Court of Justice of the European Union (CJEU) where the Court held that EU law obliges Member States to provide compensation for both material and non-material damages, including pain and suffering.³⁵⁵ One stakeholder referenced this case and noted how they felt that, until this was remedied, Ireland was in breach of EU law for failing to adequately transpose EU law.

We need to look at whether the failure to transpose the directive about compensation is a breach of EU law. If we are talking about a Section 6 Order under the 1993 Criminal Law Act, then the judges need to be trained on that. Legal representatives and the Garda need to know and properly assess what is the loss to the client, so that can be put to the courts at an early stage. If that's

³⁵⁴Irish Human Rights and Equality Commission (2023), [Submission on Compensating Victims of Crime to the Law Reform Commission on the Fifth Programme of Law Reform](#), p18.

³⁵⁵[LD v Criminal Injuries Compensation Tribunal & Ors, Case 284-24, 2 October 2025](#), para 39.

not the proper avenue, then the criminal injuries compensation scheme needs to be expanded. It's quite embarrassing internationally that no one in Ireland has received compensation.

– Stakeholder 09

The Law Reform Commission (LRC) has recommended significant changes to the current compensation for victims of crime including the establishment of a new statutory scheme, overseen by a new statutory body which would include compensation for pain and suffering, provide a contribution to legal cost and increase the time limits within which victims could apply for compensation.³⁵⁶ The Minister for Justice has now published a revised Criminal Injuries Compensation Scheme³⁵⁷ which allows for compensation for pain and suffering, with guidelines on the quantum to be published in Autumn 2026, and has convened a Working Group to examine the LRC report.³⁵⁸

Partnerships

International cooperation

Law enforcement

From an investigative and operational perspective, An Garda Síochána regularly cooperate with international law enforcement agencies such as Europol, Interpol and Frontex,³⁵⁹ and the Police Service of Northern Ireland and National Crime Agency as part of the Joint Agency Task Force, established in 2015, to combat cross-jurisdictional organised crime.³⁶⁰ The US Department of State notes that various bilateral and multinational investigations and operations resulted in the identification of 336 victims and arrest of 65 suspects across all participating countries in 2024.³⁶¹ In its third report,

³⁵⁶ Law Reform Commission (2026), [Compensating Victims of Crime](#), Overview para 7.

³⁵⁷ See [Criminal Injuries Compensation Scheme](#) for more details and Part 6 particularly.

³⁵⁸ Department of Justice, Home Affairs and Migration (27 July 2026), [Minister Jim O'Callaghan publishes amended Criminal Injuries Compensation Scheme](#).

³⁵⁹ An Garda Síochána, 11 July 2025, [An Garda Síochána participate in operation global chain targeting human trafficking with Europol, Interpol and Frontex](#).

³⁶⁰ Police Service of Northern Ireland, 7 March 2025, [Police Service of Northern Ireland and Garda Síochána work together in joint day of action](#).

³⁶¹ US Department of State (2025) [2025 Trafficking in Persons Report: Ireland](#).

GRETA welcomes improvements in international cooperation in THB cases and encourages Ireland to utilise international cooperation tools more frequently including Joint Investigation Teams (JITs) in THB cases,³⁶² which are handled by the Irish Desk at Eurojust.³⁶³

Ireland is also a member of the European Multi-disciplinary Platform Against Criminal Threats (EMPACT), and in 2024 to 2025 participated in 22 of the EMPACT operational actions relating to THB.³⁶⁴ A stakeholder noted, out of the 15 operation actions in which An Garda Síochána participate, a number relate to child trafficking and ICT-facilitated trafficking.

The Guards are really well plugged in. EMPACT has been really fundamental for that. The Office of the Director of Public Prosecutions, too, and having people in Eurojust and in the Commission.

– Stakeholder 18

Europol and Eurojust assistance

The majority of stakeholders who discussed international cooperation, felt that the area in which this was strongest was at official level, particularly in law enforcement, although stakeholders working in CSOs also spoke about attending EU and European events and roundtables. In addition to participation in JITs as a way to improve international investigations, by accessing the expertise of Eurojust and Europol including in relation to ICT-facilitated trafficking, stakeholders also highlighted the resources that were made available for EU and transnational operations.

Good working relationships where everyone is working towards improving things. Those Joint Investigation Teams and operational task forces that Europe coordinates, are very, very helpful and progressive. There is also funding attached to it. Europol arranges meetings and allows the exchange of information via their secure network. There is lots of cross-collaboration, which

³⁶²Council of Europe (2022), [GRETA Third Evaluation Report: Ireland](#), p54.

³⁶³Eurojust, [European Union Agency for Criminal Justice Cooperation \(Eurojust\) Ireland](#).

³⁶⁴Government of Ireland (2024), [Report submitted by the authorities of Ireland on measures taken to comply with Committee of the Parties Recommendation CP/Rec \(2022\)09 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings](#), p28.

is very, very beneficial because at the end of the day, Ireland is an island. We are primarily a transit or destination country when it comes to trafficking, so this international collaboration is really, really important.

– Stakeholder 22

Cooperation with the UK

Strong cooperation between Ireland and the UK and particularly Northern Ireland was cited by a number of stakeholders. It was viewed as important, not just in investigations and prosecutions, but also information sharing and learning from good practice in relation to protection and identification of child victims when developing systems and processes in Ireland.

I know the National Crime Agency and Home Office conduct joint operations with the PSNI, An Garda Síochána and the Government departments which is very positive.

– Stakeholder 03

Learning from international good practice

Some stakeholders felt that Ireland could be learning more from other jurisdictions, particularly European countries in relation to our human trafficking response. They also noted the need for greater coordination in relation to at-risk and missing children and at civil society level.

The girls in care. They are 15 to 18 years of age. Obviously, we're not learning lessons from other countries, like France and the UK. It's unfortunate. You see cases that a girl has gone missing and been reported missing by Tusla and it is her 14th time being reported missing, you know?

– Stakeholder 11

I think there's a huge piece of work to be done. Trying to look at the all-island model. I think there's a lack of connection or partnership between NGO

stakeholders. We need more of an understanding and more of a joined-up approach between Northern Ireland and Ireland.

– Stakeholder 03

International conventions and EU legislation

In relation to Ireland's response to ICT-facilitated trafficking, GRETA recommends that Ireland ratify the Budapest Convention³⁶⁵ noting the increasing use of ICT by traffickers and the subsequent increasing importance of electronic evidence in investigations and prosecutions.³⁶⁶ The State committed to ratification via the publication of a Criminal Justice (Protection, Preservation of and Access to Data on Information Systems) Bill and the publication of further legislation to give effect to other provisions of the Convention relating to the collection and interception of data and mutual legal assistance.³⁶⁷ The need for legislative reform, particularly the adoption of international conventions, such as the Warsaw Convention³⁶⁸ to assist with asset seizures and freezing assets abroad and EU legislation relating to e-evidence sharing and the transfer of criminal proceedings, was mentioned by a number of stakeholders as essential to improving international cooperation.

Information and data sharing

A final point raised by stakeholders relating to international cooperation, data sharing and ICT was the need to improve shared and secure data systems, or make use of existing ones, for those working to combat child trafficking.

The International Children Gone Missing database. There seems to be only three children missing in Ireland, and they've been missing since 2005. We know that's not accurate. There is a need for us to improve our data gathering in relation to violence against children.

³⁶⁵ Council of Europe, European Treaty Series No.185, 23 November 2001, [Convention on Cybercrime \(Budapest Convention\)](#).

³⁶⁶ Council of Europe (2022), [GRETA Third Evaluation Report: Ireland](#), p54.

³⁶⁷ Minister for Justice, Home Affairs and Migration, Jim O'Callaghan TD, [Parliamentary Question 372, 8 May 2025](#).

³⁶⁸ Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS No. 198) (Warsaw Convention).

– Stakeholder 17

[Regarding] international commitments and cooperation, I would love one repository, a really secure portal to keep active updates on numbers of prosecutions, or convictions.

– Stakeholder 18

National cooperation

At national level, the Department of Justice, Home Affairs and Migration acts as the National Coordinator for the State's THB response. The NAP commits to improving partnerships with CSOs via the Human Trafficking Stakeholder Forum and with educational institutions,³⁶⁹ however the Commission remains concerned that stakeholders, particularly CSOs, have not been involved to a sufficient degree to date in the NAP implementation, monitoring and review processes.³⁷⁰ Once operational, the new NRM will require extensive cooperation between Competent Authorities and Trusted Partners to detect and identify victims of THB and provide supports and services to them.³⁷¹

Inter-agency and CSO cooperation

Many stakeholders felt that current cooperation could be improved and that existing inter-agency cooperation was a bit fragmented with anti-trafficking actors working in siloes.

³⁶⁹ Department of Justice, Home Affairs and Migration (2023), [Third National Action Plan to Combat and Prevent Human Trafficking 2023-2027](#), Actions 4.1 & 4.2.

³⁷⁰ Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), pp199 & 200.

³⁷¹ [Criminal Law \(Human Trafficking\) \(Amendment\) Act 2013](#), Chapter 2.

Each case provides a learning. So what worked in one case should really be informing practice in another, you know, and I don't know if there's enough conjoined thinking. I'm not sure we're bringing all the dots together in an informed practice. It seems like it's just each agency on its own.

– Stakeholder 13

When I started working in this area, one of the things that struck me was the lack of coordination and, you know that the players in the situation were very siloed.

– Stakeholder 16

A number of stakeholders were particularly critical about the lack of meaningful engagement of CSOs in the national trafficking and child trafficking response.

It's like a token tick box exercise that the Department of Justice has for stakeholder engagement for civil society. The agenda is set by them; they chair it and it's tightly controlled.

– Stakeholder 08

Inadequate data collection

In relation to child trafficking, Tusla has established a Working Group on Child Trafficking, which includes An Garda Síochána and MECPATHS, with the Commission as an observer.³⁷² This group is developing national trafficking indicator guidance to screen children and a training framework for frontline staff, reviewing the Tusla and An Garda Síochána Joint Working Protocol and taking measures to improve and enhance data collection and report on known and suspected child trafficking among Tusla service users.³⁷³

Poor levels of data collection at national level were cited by a number of stakeholders, many of whom noted that without this, the national response in relation to child

³⁷²Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), pp28 & 29.

³⁷³[Ibid](#), p29.

trafficking was not coordinated or sufficiently standardised, as it needs to come from an evidence base.

We need a national system to capture data so that we will have capacity at least to be able to pull some relevant data on the suspicion or reasonable grounds piece for children who come to the attention of Tusla.

– Stakeholder 15

At the moment we don't have a validated system which marks all the points of child trafficking, the purpose and other information such as the response by all the connected agencies involved. We need a new level of standard practice, standardised practice.

– Stakeholder 07

Data in relation to the risk or extent of ICT-facilitated trafficking was identified as particularly poor.

We are lacking data in the Irish context on this, on the extent to which ICT has been used in that grooming process, even though we absolutely know it's happening, and if you do even a media search of cases that appear before court it seems prevalent. I suspect it's just that that's not really in the public's eye yet, that a girl could be trafficked, and her trafficking could start on the likes of Snapchat. We could really benefit from more concrete data in Ireland on the extent to which technology is playing a role.

– Stakeholder 12

6. Emerging areas of concern relating to child trafficking

The Commission has previously highlighted the NAP commitment to facilitate research into undetected human trafficking in Ireland and that child trafficking, TLE for forced begging, TCA and trafficking for forced surrogacy, forced marriages and illegal adoptions are currently under-explored.³⁷⁴ The Department of Justice, Home Affairs and Migration launched a tender on Research Ireland to gather data on child trafficking for sexual and criminal exploitation.³⁷⁵ The Ombudsman for Children Office, as part of a research project into at-risk children, will focus on criminal and sexual exploitation.³⁷⁶ These two forms of child trafficking were the key areas of concern of the majority of stakeholders.

I think the most prevalent types of child trafficking that are happening in this country are children being trafficked for both sexual exploitation and criminal exploitation. And it is happening on an alarming scale.

– Stakeholder 08

Regarding child exploitation trends at the moment, I'm seeing criminal exploitation and sexual exploitation. In some cases there is sexual abuse with associated criminal exploitation, so both are going on.

– Stakeholder 05

Given the OSCE concern as to the vulnerability of children to ICT-facilitated trafficking, the pace of new technological developments and the pace at which organised crime groups (OCGs) adapt to these,³⁷⁷ the use of ICT to facilitate child trafficking also requires additional and ongoing research, given the lack of data on this in Ireland and in light of the use of artificial intelligence (AI) to generate child sexual abuse material.³⁷⁸

³⁷⁴Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p182.

³⁷⁵Department of Justice, Home Affairs and Migration, [Research Ireland, Public Service Fellowship](#).

³⁷⁶Ombudsman for Children Office, [Young Lives at Risk Research Project](#).

³⁷⁷Organization for Security and Co-operation in Europe (2020), [Leveraging Innovation to Fight Trafficking in Human Beings: A Comprehensive Analysis of Technology Tools](#), p2.

³⁷⁸Europol, 28 February 2025, [25 arrested in global hit against AI-generated child sexual abuse material](#).

ICT-facilitated child trafficking for sexual exploitation

EU statistics show that 92% of victims of TSE are women and girls, and that this is the primary form of exploitation of EU child victims.³⁷⁹ In Ireland, six of the ten officially identified child victims in 2024 were trafficked for sexual exploitation, and in the period 2022 to 2024, 13 of the 20 child victims of THB, were trafficked for sexual exploitation, 12 girls and one boy.³⁸⁰ A number of stakeholders referenced one successful conviction for child trafficking for the purpose of sexual exploitation although this did not have an ICT element.

Although TSE of children has been prevalent for many years, the Covid-19 pandemic resulted in much greater risks of ICT-facilitated TSE of children as the world moved its activities into the digital space and children spent more time unsupervised online.³⁸¹ In its Second Evaluation Report, the Commission examined how ICT-facilitated trafficking is occurring for sexual exploitation.³⁸² With the proliferation of websites selling sex, and the fact that live sex acts can be viewed on streaming services, the evidence suggests that ICT is playing a rapidly growing role in the facilitation of TSE. The OSCE notes the proliferation of cybersex trafficking globally and the threat that this poses to children.³⁸³ While the Commission's examination of ICT-facilitated TSE did not focus specifically on children, it highlighted the clear demand of buyers for youth, and while websites made efforts to portray the women and girls as over 18 they used language and imagery that implied extreme youthfulness.³⁸⁴ In light of the increase in reports of the online

³⁷⁹ European Commission (2021), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy on Combatting Trafficking in Human Beings 2021- 2025, COM(2021) 171 final (EU Strategy on Combating Trafficking in Human Beings) para 5.

³⁸⁰ Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p8.

³⁸¹ Europol, [Europol Covid-19 and child sexual exploitation](#).

³⁸² Irish Human Rights and Equality Commission (2023) [Trafficking in Human Beings in Ireland: Second Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), pp201-242.

³⁸³ Organization for Security and Co-operation in Europe (2020), [Leveraging Innovation to Fight Trafficking in Human Beings: A Comprehensive Analysis of Technology Tools](#), pp12 & 13.

³⁸⁴ Irish Human Rights and Equality Commission (2023) [Trafficking in Human Beings in Ireland: Second Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), pp221 & 224-225.

exploitation of children in Ireland has been identified by the Sexual Exploitation Research and Policy Institute (SERP) as a key area requiring further research.³⁸⁵

Engagement with the private sector

Many stakeholders listed TSE and ICT-facilitated TSE of children as a key concern. They felt that not enough was being done in relation to holding the private sector to account for advertising sexual services online and making sure that children were not being exploited, even if the current data suggested that this was not happening to a great extent in Ireland.

Youth is highly prized in the sex trade. It's something that certain sex buyers will, in particular, seek out. So what we would have noticed is in the advertising websites, with a big focus on Escort Ireland because it really still does have the monopoly in Ireland. My argument would be they're facilitating sexual exploitation and trafficking in Ireland and they're profiting from it. When you're looking for victims of trafficking in the sex trade, and you're using the websites, you're looking for a needle in a haystack, rather than just taking apart the whole haystack.

– Stakeholder 12

The Joint Oireachtas Committee on Children, Disability, Integration and Youth has noted that children and young people are fearful of AI and how easy it makes it to groom and sexually exploit children.³⁸⁶ Children consulted as part of that report also highlighted the need for improved parental monitoring and education for children around the risks of exploitation online and round issues such as consent.³⁸⁷ Their views are supported by the Children's Rights Alliance which believes current efforts to educate children are

³⁸⁵Canning M, Keenan M, Breslin R (2023), [Protecting Against Predators: A Scoping Study on the Sexual Exploitation of Children and Young People in Ireland - Executive Summary](#), p7.

³⁸⁶Joint Oireachtas Committee on Children, Equality, Disability, Integration and Youth (2024), [Report on Safeguarding Children in the Age of AI](#), p43.

³⁸⁷[Ibid](#), p43 & 44.

insufficient,³⁸⁸ by SERP,³⁸⁹ and by the Irish Council for Civil Liberties³⁹⁰ which has raised concerns about algorithms pushing harmful and exploitative and sexually exploitative content on children. Related to this, the first operational recommendation of the Online Health Taskforce Final Report is that policies, strategies and solutions must be produced to address all areas of online risk to children, including harmful algorithms, exposure to and creation of child sexual abuse material (CSAM), including AI-generated content, and grooming for sexual exploitation, trafficking or criminal behaviour.³⁹¹

Sexual exploitation via social media and gaming

A number of stakeholders recognised the large increases in the online sexual exploitation of children being targeted via social media and gaming platforms and the lack of parental control of these platforms.

Now, we know that Snap Maps³⁹² has been used in a number of grooming cases. Really, really detailed insight. And kids love it, and it's really difficult to persuade them to use it in its ghost mode...The NSPCC in the UK made a Freedom of Information type request to, I think, the Metropolitan Police in London. Snapchat was used in 40%³⁹³ of all grooming cases that they covered. ICT is greatly amplifying the problem, exacerbating the problem. Snapchat and platforms like Roblox. You know, there was Hindenburg³⁹⁴ research that was released in 2024 that found lots of problems with grooming online.

– Stakeholder 02

³⁸⁸Children's Rights Alliance (2025), [Online Safety Monitor 2025](#), p40.

³⁸⁹Breslin R, O'Connor M (2024), [Facing Reality: Addressing the role of pornography in the pandemic of violence against women and girls](#), p17.

³⁹⁰Irish Council for Civil Liberties (14 February 2024), [Tech companies will not save our kids: ICCL speaks at Oireachtas Children's Committee](#).

³⁹¹Department of Health (2025), [Online Health Taskforce Final Report, Online Health and Rights for Ireland's Children and Young People](#), p25.

³⁹² Snapchat 'Snap Map 'is the most personalised Map and lets you see where you and your friends are and have been, what's going on around you, save and find your favourite restaurants and bars, and even see what's happening across the world.' [[Website](#), accessed 16.06.2026].

³⁹³ National Society for the Prevention of Cruelty to Children UK (13 November 2025) [Data shows how criminals are using private messaging platforms to manipulate and groom children. We're urging tech giants to act as online grooming crimes reach record high](#). [Website accessed 16.06.2026].

³⁹⁴Hindenburg Research (2024), [Roblox: Inflated Key Metrics for Wall Street and a Paedophile Hellscape for Kids](#).

What I'm seeing is the use of video games. And making sexual exploitation a game. Like 'show us your breasts' and you get 10 points.

– Stakeholder 13

Stakeholders mentioned that younger and younger children are being contacted online with efforts made to exploit them with many noting that certain age cohorts of children were contacted through different platforms.

Gaming is probably more popular with that under-13 cohort than social media. Around 38% of 8-12-year-olds say that they are gaming with people that they don't know, and that they're contacted by people that they don't know through online games. Many kids will talk about being contacted by a stranger, or, you know, being in a game like Roblox, and somebody saying they wanted to see them naked and share their bed.

– Stakeholder 02

Some of the girls in particular are saying if they're online and they have a public TikTok there is just a total expectation that they have what they call 'randomers' following them. These girls, and they're 15, some of them are 16, might have a bunch of men over 55 that follow them. Some of those men will comment on their videos and try to message them directly if they have private messages. Those men will say things like, 'nice boobs, nice lips'. Some of them have said that they get messages from these guys saying, 'I think you're really, really cute. Will you be my girlfriend? I'll make it worth your while, I'll pay you'.

– Stakeholder 12

Child sexual abuse material

The age of children arose expressly in relation to CSAM with children aged under 12 targeted for this form of abuse. Some stakeholders noted the alarming increase in such material with younger and younger children being targeted by individuals and organised networks. They commented how CSAM and the live streaming of abuse and online commercial exploitation of children would constitute child trafficking, noting that this area would be worth examining in further detail.

Internet Watch Foundation based in the UK provided alarming figures in terms of the age of the children that are being targeted. They could see how much it increased in the past year, and they could see much more and more younger children being targeted online.... it was as young as 2-years-old. So the age was getting younger and younger and the severity of sexual abuse was getting bigger and bigger. They reported lots of rape cases.

– Stakeholder 10

Remote child sexual abuse which is a big problem in the UK, in the Netherlands and France and in America, obviously. The Philippines is a hotbed for it, but I suspect it's far more prevalent than what we're hearing about. Basically, I pay someone in the Philippines 30, 40 euros by Western Union, and then she will abuse the child to my orders on camera. So that's a big issue. I think that you could call it human trafficking as it definitely fits the bill. There would be no harm in IHREC getting involved and raising awareness of it because there's no doubt in my mind whatsoever that Irish people are involved.

– Stakeholder 11

ICT-facilitated child trafficking for other forms of exploitation

The Commission has noted that there is now little distinction between ICT-facilitated THB and 'traditional' THB given the prevalence of technology.³⁹⁵ The European Commission notes that organised crime groups and traffickers have increasingly moved online for all phases of trafficking as they adapted their business models according to demand during Covid-19.³⁹⁶ It also notes how children face a particular risk of online exploitation and how ICT has assisted the trafficking of children not just for sexual

³⁹⁵ Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p92.

³⁹⁶ European Commission (2021), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy on Combatting Trafficking in Human Beings 2021- 2025, COM(2021) 171 final (EU Strategy on Combating Trafficking in Human Beings) para 4.3.

exploitation but also for labour exploitation, organ removal, illegal adoptions and forced marriages.³⁹⁷ EU data shows the increasing exposure of children to online recruitment and grooming for sexual exploitation, exploitation in criminal activities and forced begging.³⁹⁸ The Garda National Cyber Crime Bureau notes that in addition to being sexually exploited online, children are also targeted to buy expensive items and exploited in other ways by adults.³⁹⁹

Recruitment for labour and criminal exploitation

Stakeholders were very well aware of the risk to children of ICT-facilitated TSE, but a number mentioned that children were increasingly being recruited online for other forms of exploitation such as criminal or labour exploitation.

These online platforms, there would be a lot of recruitment online, there's no doubt that it's happening. So, this goes back, a lot of state agencies' understanding is of human trafficking, do they actually understand that there could be elements of trafficking within that? There could be children as well [as adults] being recruited online via, Instagram, Facebook, by job adverts, but they're not genuine ads.

– Stakeholder 06

I've heard of children being recruited online to do cybercrime.

– Stakeholder 17

One of these stakeholder's spoke of how children were being recruited online, sexually exploited and then trafficked for other forms of exploitation both online and off.

Child trafficking has a huge element of technology, whether it's during the recruitment phase, whether it's during the control phase, or even the exploitation, as I said, like live streaming, child sexual abuse materials or any sexual exploitation of children. That sexual exploitation is sometimes used

³⁹⁷ [ibid.](#)

³⁹⁸ Irish Human Rights and Equality Commission (2023), [Trafficking in Human Beings in Ireland Second Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p147.

³⁹⁹ RTÉ News, 27 November 2025, [Senior cyber crime garda warns of 'alarming' scale of child grooming within games.](#)

against those children, to force them to commit crime. In the digital world, the child doesn't know whether it's talking to a peer or an adult, so the whole grooming starts there, but then when it comes to exploitation, there are also lots of offline elements.

– Stakeholder 10

Child trafficking for criminal activities

In its Third Evaluation Report, the Commission noted how TCA has only recently started being researched in Ireland with a focus on drug-related intimidation, and also in the UK due to 'county lines' drug dealing by children,⁴⁰⁰ where children are exploited by gangs and use mobile phones to sell drugs. In Ireland from 2022 to 2024, four child victims of TCA were identified, two girls and two boys, none were Irish nationals.⁴⁰¹

Migrant children and unaccompanied minors

A number of stakeholders spoke about their knowledge of TCA in relation to migrant children and unaccompanied minors with some referencing Vietnamese adults and children being trafficked here to work in illegal cannabis "grow houses".

Irish children – family networks and organised crime

TCA makes up 25% of child referrals to the NRM in the UK.⁴⁰² A recent study on child victims of criminal exploitation in Northern Ireland notes the risk to children, whose families are involved in paramilitarism and organised crime, of being exploited to commit crimes such as drug dealing, shoplifting and money laundering.⁴⁰³ Given the extensive OCG links between Ireland and Northern Ireland,⁴⁰⁴ and the family networks

⁴⁰⁰Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p288.

⁴⁰¹Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p163.

⁴⁰² Kane, G. and Chisholm, A. (2025) [Identifying Modern Slavery and Human Trafficking in the Context of Child Criminal Exploitation in Northern Ireland](#), p30.

⁴⁰³ [ibid](#), pp30 & 31.

⁴⁰⁴Azure Forum (2021), [Exploring Serious and Organised Crime Across Ireland and the UK](#), p7.

involved,⁴⁰⁵ it seems unlikely that no Irish children have been exploited. A number of stakeholders listed TCA of children as their top concern in relation to child trafficking.

I think that forced criminality is probably the biggest area that we're going to see where children are going to be exploited, as in criminal exploitation. There's no doubt about it, because it's so easy.

– Stakeholder 06

The Greentown study⁴⁰⁶ and replication studies Bluetown⁴⁰⁷ and Redtown,⁴⁰⁸ all revealed how children are lured into criminal behaviour by family gangs and criminal networks. The Greentown study highlighted how children were often carefully selected for their personal vulnerability to exploitation based on their family history of crime including through older siblings and poor family support networks often due to substance abuse while also noting instances of grooming.⁴⁰⁹ The study also noted how difficult it is for children to withstand pressure to become involved in criminality and the difficulties in escaping from the networks for example due to fear, the social status membership of the network provided, and a lack of family support.⁴¹⁰

Lack of prosecutions for grooming children into criminal activity

In addition to being a large push factor for young children to become engaged in criminal activity, the family network aspect of child TCA has been highlighted by the Commission as a potential difficulty in securing prosecutions under the Criminal Justice (Engagement of Children in Criminal Activities) Act 2024.⁴¹¹ Although official

⁴⁰⁵Police Service of Northern Ireland & An Garda Síochána (2018) [Cross Border Organised Crime Threat Assessment 2018](#), Section 4.0.

⁴⁰⁶University of Limerick (2016), [Lifting the Lid on Greentown: Why we should be concerned about the influence criminal networks have on children's offending behaviour in Ireland](#), p6.

⁴⁰⁷University of Limerick (2020), [Lifting the Lid on Bluetown: A replication case study, which investigates the contribution of engagement in a local criminal network to young people's more serious and persistent offending patterns](#), p8.

⁴⁰⁸University of Limerick (2020), [Lifting the Lid on Redtown: A replication case study, which investigates the contribution of engagement in a local criminal network to young people's more serious and persistent offending patterns](#), p11.

⁴⁰⁹University of Limerick (2016), [Lifting the Lid on Greentown: Why we should be concerned about the influence criminal networks have on children's offending behaviour in Ireland](#), pp38 & 44.

⁴¹⁰[Ibid](#), 33, 39, 45 & 46.

⁴¹¹Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human](#)

figures state that 17 proceedings have been initiated since the Act commenced in May 2024,⁴¹² the lack of successful prosecutions under this legislation was raised by a number of stakeholders.

92% of the children that they researched had a familial connection with the person who had exploited them and groomed them into criminal activity. I really think that legislation, the grooming legislation that was put into place in 2024, because that piece of legislation depends on the testimony of the child against the adult, there is not a chance that that'll ever happen. And regardless of whether they're even related to them or not, they're not going to be a 'rat' in their own community.

– Stakeholder 08

At-risk children and children in care

The amended Directive references the vulnerability to THB of children in care and living in residential institutions.⁴¹³ The OCO also highlights how children without adequate family support are often at risk of getting caught up in gangs and coming to the attention of the criminal justice system.⁴¹⁴ The Child Law Project findings support this and documents instances where a lack of stable and appropriate care or foster placement have led to poor mental health outcomes and children coming into contact with youth justice services.⁴¹⁵ The extent of the representation of children in care in the criminal justice system has been identified by the Irish Penal Reform Trust as an area where more data is required to improve the general policing response and the Garda National Youth Diversion Programme specifically.⁴¹⁶ The issue of children in care being easily

[Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p163.

⁴¹²Minister for Justice, Home Affairs and Migration, Jim O'Callaghan TD, [Parliamentary Question 43, 19 March 2026](#).

⁴¹³Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Recital 7.

⁴¹⁴Ombudsman for Children Office, [Young Lives at Risk Research Project](#).

⁴¹⁵Child Law Project (2024), [Presentation to the Department of Children, Equality, Disability, Integration and Youth](#), p5.

⁴¹⁶Irish Penal Reform Trust (2019), [Care and Justice: Children and Young People in Care and Contact with the Criminal Justice System](#), p48.

identifiable targets for exploitation, particularly criminal exploitation was raised by a number of stakeholders.

[We need to have] the conversation of whether we're talking about children who have behavioural issues, or children that are a bit isolated, or those in care facilities, and they've been an easy target. So what happens is that the criminals start targeting those children.

– Stakeholder 10

A residential unit often just becomes a target for people who want to traffic and exploit children as they're a very identifiable group.

– Stakeholder 15

Victim blaming of criminally exploited children

Regarding the failure to examine child offenders through a trafficking, child-sensitive or victim-centred lens, a key concern was that child victims of criminal exploitation were being blamed for their behaviour in a way other child victims may not be.

Victim blaming, and that is what is happening across the board, with children on the drugs piece who have been trafficked for criminal exploitation. The level of victim blaming is horrific. You have to employ that child rights-centred lens.

– Stakeholder 06

Lack of awareness of indicators of trafficking for criminal exploitation

UNODC notes that the criminal justice sector needs more awareness of indicators of trafficking for criminal exploitation, as child victims of TCA are often considered suspects,⁴¹⁷ which can hide the extent of the problem. The lack of understanding of the relationship between child criminal exploitation and child TCA was highlighted by the International Organization for Migration (IOM) as a problem in both Ireland and Northern

⁴¹⁷United Nations Office on Drugs and Crime, [Child Trafficking for Exploitation in Forced Criminality Activities and Forced Begging](#).

Ireland.⁴¹⁸ Persons interviewed by IOM highlighted the lack of awareness of the signs of TCA and how to identify child victims. They believed that viewing and describing such children as criminals, as opposed to victims, was one of the reasons the numbers of child victims of TCA were so low in Ireland and Northern Ireland in comparison to the UK.⁴¹⁹ A large number of stakeholders agreed that there was a high risk that children were often being misidentified as suspects and offenders by law enforcement and communities.

I really think that the risk of misidentification, that they're being treated as offenders and suspects, rather than potential victims is something that does happen.

– Stakeholder 13

Others felt that the issue was the State and agencies of the State were still unwilling to accept that grooming and recruiting children into criminal exploitation is child abuse and constitutes a child trafficking offence.

I think it is in terms of that broader legislative interpretation of trafficking for criminal exploitation. There has been significant investment on behalf of the Government into programmes like the youth diversion programmes. Considering that huge investment there's a reluctance there to maybe look at what else it could be. Lifting the Lid on Greentown was nearly 10 years ago now and the findings in the prevalence study the following year clearly spoke to what is being described internationally as child trafficking for criminal exploitation.

– Stakeholder 21

Examination of child offenders for trafficking indicators

There is some evidence, however, that attitudes are changing with the Policing Authority reporting in 2022 that organisations working with children who have been caught up in criminality are now considering how children are being exploited by gangs to sell

⁴¹⁸Chisholm A, Burland P, Dew J, Stephenson T, (2023), [A Study into Human Trafficking Between Ireland and Northern Ireland](#), p17.

⁴¹⁹[ibid.](#)

drugs.⁴²⁰ One organisation relayed how they were now referring to this exploitation as child trafficking, however many youth workers spoke about poor policing practice by members of An Garda Síochána in interactions with these children including verbal and physical abuse.⁴²¹ This is despite findings of a 2017 survey where Juvenile Liaison Officers in urban and rural areas reported that one in eight of the children they were engaged with had profiles consistent with children who participated in the Greentown study.⁴²² A number of people mentioned the need for there to be a review of these types of criminal convictions for children and for the review to approach cases through a trafficking lens.

Without proper assessment on the surface it looks like they're drug dealers, but until you go in-depth into their life, maybe they're vulnerable and they're easily picked and targeted and so they may never be viewed or assessed as victims of human trafficking for forced criminality.

– Stakeholder 22

Recruitment of very young children

In relation to TCE, a number of stakeholders mentioned how without action, the crime would continue as victims of this crime, they noted, often then became perpetrators recruiting very young children, an issue previously highlighted by MECPATHS.⁴²³ The recruitment of young children, below the 'age of criminal responsibility'⁴²⁴ has been raised by the Garda Inspectorate.⁴²⁵ Consultations by the Policing Authority support this assertion: with community and youth organisations regarding children lured into criminality by money, gifts and drugs debt noting that the age when they are normally

⁴²⁰The Policing Authority (2022), [What We Heard 2022](#), p10.

⁴²¹[Ibid](#), p10 & 11.

⁴²²University of Limerick (2017), [National Prevalence Study: Do the findings from the Greentown study of children's involvement in a criminal network \(2015\) extend beyond Greentown?](#), p12.

⁴²³Irish Examiner, 6 November 2024, [Children as young as eight being recruited by criminal gangs to deliver drugs and collect debts](#).

⁴²⁴Department of Justice Home Affairs and Migration, [Youth Justice Legislation](#). (2021) 'no child under the age of 12 years can be charged with an offence. An exception is made for 10- and 11-year-olds charged with very serious offences, such as unlawful killing, a rape offence or aggravated sexual assault. In addition, the Director of Public Prosecutions must give consent for any child under the age of 14 years to be charged.'

⁴²⁵Garda Síochána Inspectorate (2024), [Transnational Organised Crime A Review of the Structures, Strategies and Processes in the Garda Síochána](#), p243.

targeted is between eight and 12 but that they were aware of children as young as six being exploited as drug runners.⁴²⁶

As we all know, that's what criminals do. They get the younger people because there are benefits to be got if you're a juvenile arrested, you're going to avail the juvenile liaison diversion system. And so they are being exploited by drugs gangs.

– Stakeholder 22

Young kids actually being groomed by older kids.

– Stakeholder 18

Some stakeholders mentioned how they felt that the failure to recognise child victims of TCA as victims of trafficking was similar to the State's previous failure to tackle domestic violence and historical institutional abuse, noting potential legal action by victims in the future.

I always liken anti-human trafficking efforts to be similar to the efforts made over the last two decades when it comes to domestic violence. I think 20 years ago in Ireland, people were like, oh, it doesn't happen here. We're not going to talk about that. We're certainly not going to acknowledge it will open up a whole can of worms. And I think that's where we're at with child criminal exploitation and with trafficking in this country. There's just this reluctance to even speak about or acknowledge that it's happening.

– Stakeholder 08

The Council of Europe are very clear in their definitions. And they would say this is child trafficking. And the Irish State's refusal will come back to bite them. We've seen case law in the UK where children were missed as victims of trafficking because the State decided they didn't want to see them through that lens.

– Stakeholder 21

⁴²⁶The Policing Authority (2022), [What We Heard 2022](#), p10.

Child trafficking for other forms of exploitation

Labour exploitation

While not listed by all stakeholders in relation to Ireland, a number mentioned child trafficking for labour exploitation as a concern particularly with regard to children being trafficked to Ireland to work in car washes and nail bars. These concerns were primarily in relation to migrant children and them being trafficked and exploited particularly by their own communities.

What happens in a lot of the labour exploitation cases is that it is exploitation by compatriots from the same country.

– Stakeholder 18

I am aware of cases of Romanian kids coming over from lower socio-economic groupings in Romania, so they are vulnerable because of poverty. They're coming to Ireland to work in car washes and the farming industry. I often wonder to myself when I'm walking around town and I see all these young lads on their bicycles doing, working in the gig economy, I wonder, are they, some of them, being trafficked, you know? Like, young Brazilians especially, you know?

– Stakeholder 11

Forced begging

The European Commission has noted that while not a prevalent form of THB across Member States at just 2% of recorded cases, forced begging remains an issue which affects mainly Eastern European nationals including Roma ethnicities.⁴²⁷ Pavee Point, the Traveller and Roma Centre, has highlighted that begging is undertaken by non-Traveller and non-Roma as well as Roma communities.⁴²⁸ They have also noted that

⁴²⁷European Commission (2025), Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the progress made in the European Union in combating trafficking in human beings (Fifth Report), para 2.4.

⁴²⁸ Pavee Point (2023), [Supplementary Submission to the Joint Oireachtas Committee on Justice, Equality and Defence on the Issue of Sexual Violence](#), Section 2.1.

almost one in five Roma surveyed cited begging as a source of income.⁴²⁹ The report stated that many families living in Ireland experience serious hardship as a result of not being able to access social welfare payments, for example due to issues with the Habitual Residence Condition, ‘with consequences such as school non-attendance and effectively being forced into begging.’⁴³⁰

As noted in the amended EU Directive ‘Trafficking in human beings has various root causes. Poverty, conflict, inequality, gender-based violence, the absence of viable employment opportunities or social support, humanitarian crises, statelessness and discrimination are among the main factors that make persons, especially women, children and members of marginalised groups, vulnerable to trafficking.’⁴³¹

The Immigrant Council of Ireland believes that in relation to trafficking for forced begging, it is primarily children who are targeted.⁴³² In 2022, the European Commission reported an increase in persons with disabilities being exploited for forced begging.⁴³³

This could merit further attention in relation to child trafficking in Ireland.

The US Department of State 2025 Trafficking in Persons Report noted, however, that the lack of screening in Ireland among child victims of forced begging and forced criminality may have resulted in children being penalised for unlawful acts they were forced to commit as a result of them being trafficked.⁴³⁴ This issue was raised by some stakeholders wondering if it merited further investigation. An Garda Síochána confirmed that there were child trafficking cases of exploitation for forced begging in 2025.

⁴²⁹Pavee Point (2020), [Submission to Department of Children, Equality, Disability, Integration and Youth Statement of Strategy](#), p10.

⁴³⁰[Ibid](#), p5.

⁴³¹ Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Recital 2.

⁴³²Immigrant Council of Ireland (2018), [TRACKS Trafficking and Asylum Toolkit](#), section 1.4.

⁴³³European Commission (2022) Commission Staff Working Document Evaluation of the Proposal for a Directive of the European Parliament and the Council amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, p36.

Irish Human Rights and Equality Commission (2025), [Ireland’s Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p45.

⁴³⁴US Department of State (2025) [2025 Trafficking in Persons Report: Ireland](#).

Let's say begging. Right? That takes a lot of work to investigate. So let's say you saw a person on Patrick Street in Cork, a young girl you thought was 15 or 14, or a young boy, right? They're begging. Is there a human trafficking and forced element behind that? That takes surveillance, monitoring, who drops, who collects, what does a young person do with the money.

– Stakeholder 22

Domestic servitude

Although there appears to be limited information at Irish and EU level regarding child trafficking for domestic servitude, Nasc, the Migrant and Refugee Rights Centre, have documented a case of a 14-year-old-girl who was trafficked to Ireland for domestic servitude following the death of her parents.⁴³⁵ MECPATHS explains how child victims of trafficking for domestic servitude may often live extremely isolated lives with little or no unsupervised freedom,⁴³⁶ which makes the crime very hard to detect.

Barnardo's National Counter-Trafficking Centre in the UK highlights how child victims of domestic servitude can be of any nationality but that children in the international protection system are often targeted.⁴³⁷ The Centre notes how child victims may be forced to endure 'unbearable conditions or 'working' hours' and that, at times, their work can be misunderstood as part of the child's cultural heritage, making the exploitation even more difficult to detect and stop.⁴³⁸ Given how hidden this form of child trafficking is, further research and consideration is merited. It was referenced by a number of stakeholders as an area of concern as they were aware of cases where children were trafficked to Ireland for the purposes of domestic servitude.

Domestic servitude is apparently significant in the west of Ireland for some children.

– Stakeholder 21

⁴³⁵Nasc Ireland, [Jane's Story](#).

⁴³⁶MECPATHS, [Child Trafficking Domestic Servitude](#).

⁴³⁷Barnardo's UK [Barnardo's National Counter-Trafficking Centre Domestic Servitude](#).

⁴³⁸[ibid.](#)

Forced marriage

There have been no identified child victims of trafficking for forced marriage in Ireland, this is an area which has been under-explored. The NAP commits to examining the potential introduction of Forced Marriage Protection Orders⁴³⁹ and Europol notes that forced marriage affects both EU and non-EU national girls.⁴⁴⁰ The European Commission confirms cases of forced marriage for children as young as five and how generally it affects child victims from a migrant background.⁴⁴¹ AkiDwA has found the same, noting that this practice mainly affects Afghan, Indian and Muslim girls, many of whom hold Irish citizenship.⁴⁴² Although it is no longer legal for under 18s to get married in Ireland, AkiDwA has found that many of the girls affected had been taken abroad by their parents to marry older men.⁴⁴³ This may be an area for further research given the limited data and lack of awareness of the crime.

This phenomenon was raised by one stakeholder.

If you talk about forced marriages, it is happening in Ireland. Who is talking about it?

– Stakeholder 14

It has been reported that early and arranged marriages take place in the Traveller community with some young couples, aged 16 years and over, travelling to Northern Ireland to marry.⁴⁴⁴ Pavee Point has stated that early marriage is not a cultural practice among Roma *per se* but that it can occur in some Roma communities.⁴⁴⁵ The organisation also noted that factors such as social and political exclusion, racism, structural poverty and low formal educational attainment can make Roma and Travellers more vulnerable to trafficking and exploitation particularly TSE.⁴⁴⁶ The issue of

⁴³⁹Irish Government (2023), [Third National Action Plan to Combat and Prevent Human Trafficking 2023-2027](#), Action 3.6.2.

⁴⁴⁰Europol (2022) [European Migrant Smuggling Centre 6th Annual Report](#), p20.

⁴⁴¹European Commission (2025), Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the progress made in the European Union in combating trafficking in human beings (Fifth Report), para 2.4.

⁴⁴²AkiDwA (2020), [Early and Forced Marriages](#).

⁴⁴³AkiDwA (2020), [Early and Forced Marriages](#).

⁴⁴⁴Irish Independent, 14 February 2015, [End Option to Marry at 16 in Northern Ireland Urges Pavee Point](#)

⁴⁴⁵Pavee Point (2023), [Supplementary Submission to the Joint Oireachtas Committee on Justice, Equality and Defence on the Issue of Sexual Violence](#), Section 2.4.

⁴⁴⁶[ibid](#), Sections 2.1 & 2.4

early and potentially forced marriage in the Traveller community was raised by a few stakeholders.

The marriage piece is an interesting one, as I have been cognisant of this among children from Traveller backgrounds and wondered whether it was still happening. I met with a Traveller group and I said to the young girls there, like they were maybe 16, 17 and they said what you do is you go up the North and there's priests up the North who are known for doing this, they will marry you. They said when you're in the Traveller community, you're very restricted in childhood, like you've your curfew and you do what your dad says, and you do what your mother says. But with early child marriage you relinquish all of your childhood rights and entitlements, and you become an adult through that early marriage.

– Stakeholder 21

7. Recommendations

The research, which included engagement with relevant stakeholders, has supported the identification of a range of areas for action by State agencies, specialist organisations and statutory bodies engaged in the trafficking response in Ireland. The recommendations below cover a range of areas including legislative reform, the NRM and identification of child victims, supports and services for child victims, investigations and prosecutions, prevention, partnerships, data collection and evidence-based policy.

1. Legislative reform

(a) Ensure full and timely transposition of Directive (EU) 2024/1712

Ireland should ensure the full and timely transposition of Directive (EU) 2024/1712, which strengthens the legal and policy framework addressing trafficking in human beings and introduces several provisions of particular relevance to children and ICT-facilitated trafficking.

The State, in particular the Department of Justice, Home Affairs and Migration, should ensure full and timely transposition of Directive (EU) 2024/1712, including:

- Fully implementing Member State obligations regarding early identification of, and assistance to, victims and presumed victims, and the establishment of national referral mechanisms;
- Making the best interests of the child a primary consideration in all trafficking decisions;
- Ensuring that child victims have access to child-sensitive investigations and prosecutions;
- Providing specialised training, including ICT-facilitated trafficking to relevant actors, such as investigators, prosecutors and the judiciary;
- Incorporating provisions relating to the liability of legal persons, including online platforms involved in facilitating trafficking offences into national law.

- Providing specialist assistance and support in a victim-centred and child-sensitive way.⁴⁴⁷

(b) Ensure consistent application of the definition of child trafficking

Ireland should ensure that the definition of child trafficking is consistently reflected and applied across legislation, policy and operational practice. Under national and international law, child trafficking requires only an action (such as recruitment, transportation, transfer, harbouring or receipt of a child) and an exploitative purpose. It does not require ‘means’ such as proof of coercion, deception or movement.

Stakeholder interviews highlighted misconceptions regarding the requirement for movement or transportation for a trafficking offence to arise. This misunderstanding may contribute to the under-identification of victims, including child victims. This is particularly so in cases involving online recruitment, grooming and exploitation occurring within the State.

The State, particularly the Department of Justice, Home Affairs and Migration as National Anti-Trafficking Coordinator, should ensure consistency by:

- issuing clear national guidance confirming that movement is not required for a child to be considered a victim of trafficking and that Irish national children can be victims of trafficking;
- ensuring that this definition is explicitly reflected in training materials, operational guidance and investigative protocols across all relevant agencies; and
- promoting consistent understanding of the definition among law enforcement, child protection professionals, prosecutors, the judiciary and frontline service providers.

⁴⁴⁷ Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims Art 11.

(c) Consolidate child trafficking offences within a coherent legislative framework

Ireland's legislative framework addressing child trafficking and exploitation is currently dispersed across multiple statutes, including the Criminal Law (Human Trafficking) Act 2008, as amended, the Child Trafficking and Pornography Act 1998, and other related legislation addressing exploitation and organised criminal activity.

Several stakeholders noted that the separation of offences relating to child sexual exploitation from trafficking offences may contribute to confusion regarding the identification and classification of child trafficking cases. Further efforts are needed to ensure clarity for investigators, prosecutors and service providers, and that suspected trafficking cases are appropriately referred.

The State, particularly the Department of Justice, Home Affairs and Migration, in consultation with the Director of Public Prosecutions, An Garda Síochána, Attorney General (Office of the Parliamentary Counsel) and specialist organisations and experts – including specialist agencies, the National Rapporteur, civil society organisations and survivors/lived experience experts,⁴⁴⁸ should consider:

- reviewing the legislative framework governing child trafficking and child exploitation, with a view to consolidating statutory trafficking-related offences;
- assessing whether the current fragmentation of offences may contribute to the reclassification of trafficking cases as other forms of exploitation; and
- ensuring that legislative reforms reflect the continuum between grooming, exploitation and trafficking, particularly in cases involving online recruitment.

(d) Strengthen legislative safeguards for child victims of criminal exploitation

Ireland has taken an important step on this issue through the Criminal Justice (Engagement of Children in Criminal Activity) Act 2024, which criminalises the coercion or grooming of children into criminal activity. However, further measures may be

⁴⁴⁸ Specialist organisations and experts may include the National Rapporteur, civil society organisations, institutes, and expert individuals working in the area of anti-human trafficking, national and international, including lived experience experts/survivors.

required to ensure that children exploited in criminal contexts are consistently recognised as victims, and assisted and protected, as some stakeholders raised concerns about misidentification of children exploited for criminal activities and suggested that cases of ‘child offenders’ be reviewed for trafficking indicators.

The State, including the Department of Justice, Home Affairs and Migration, the Director of Public Prosecutions, An Garda Síochána and Tusla, should:

- promote the consistent application of the non-punishment principle, in line with international and EU obligations, and ensure its inclusion in statute;
- develop clear operational guidance for law enforcement and prosecutors on identifying indicators of child criminal exploitation, in consultation with specialist stakeholders and experts; and
- ensure that child protection services are engaged at an early stage in cases involving suspected exploitation of children for criminal activities.

(e) Review legislative responses to ICT-facilitated child trafficking

Given the increasing use of digital technologies by traffickers to recruit and exploit children, further efforts are required to review whether existing legislative frameworks sufficiently address ICT-facilitated child trafficking and exploitation.

The State, particularly the Department of Culture, Communications and Sports, in consultation with the Department of Justice Home Affairs and Migration Ireland’s National Anti-Trafficking Coordinator, Coimisiún na Meán, An Garda Síochána, Tusla, and specialist organisations and experts, should review:

- whether legislation adequately captures online recruitment and grooming;
- the effectiveness of existing regulatory mechanisms under the Online Safety and Media Regulation Act 2022 in addressing online risks to children; and
- the role of large technology companies and online platforms in preventing the facilitation of trafficking.

2. Identification of child victims and the National Referral Mechanism

(a) Operationalise the statutory NRM without further delay

Ireland has taken an important step in placing the National Referral Mechanism (NRM) on a statutory footing through the Criminal Justice (Sexual Offences and Human Trafficking) Act 2024. This development was widely welcomed by stakeholders as having significant potential to improve Ireland's anti-trafficking framework.

However, the new NRM has not yet commenced as of July 2026. The finalisation of Operational Guidance is awaited. Several stakeholders expressed concern regarding the delay in implementation and the lack of clarity regarding timelines. This poses serious concerns from a child rights perspective.

To strengthen the identification of victims and ensure access to appropriate supports, the State, specifically the Department of Justice, Home Affairs and Migration as National Anti-Trafficking Coordinator, should:

- publish and implement the NRM Operational Guidance including detailed procedures for identification and referral in consultation and collaboration with relevant statutory bodies and specialist stakeholders;⁴⁴⁹
- ensure that the Guidance clearly sets out roles, responsibilities and referral pathways for all participating bodies; and
- provide clarity regarding the functioning of the Operational Committee, Competent Authorities and Trusted Partners under the new system and ensure that its operations and assistance provided by agencies and partners are adequately resourced.

⁴⁴⁹ Including 'competent authorities' and 'trusted partners', survivors and specialist agencies, the National Rapporteur and CSOs.

(b) Establish a statutory child-specific NRM or a child-specific pathway within the NRM

Stakeholders consistently emphasised that children have a distinct legal status, specific vulnerabilities and protection needs which require a specialised trafficking response. International guidance, including that of the OSCE and Council of Europe, highlights the importance of child-specific identification procedures that prioritise child protection and the best interests of the child.

The State, including the Department of Justice, Home Affairs and Migration, as National Coordinator, in consultation with the Department of Children, Disability and Equality, key statutory bodies such as Tusla, specialist organisations and experts, should establish a clearly defined child-specific NRM pathway, which should include:

- specialised procedures for the identification of child victims;
- mandatory involvement of child protection services;
- child-appropriate assessment processes and specialised assistance; and
- safeguards to ensure that children are treated primarily as victims.

Such procedures should reflect the principle that child trafficking is a child protection issue, requiring strong coordination between trafficking and child protection systems.

(c) Establish a national focal point for child victims of trafficking

The OSCE recommends the establishment of national focal points for child victims of trafficking to improve coordination between anti-trafficking and child protection systems.

A national focal point can play a critical role in ensuring that child victims are identified early and referred to appropriate services, while also strengthening coordination between agencies responsible for child protection, law enforcement and victim support.

The State, specifically the Department of Justice, Home Affairs and Migration as National Coordinator, should consider establishing a National Focal Point for child victims of trafficking, with responsibilities including:

- facilitating cooperation between child protection services, law enforcement, immigration authorities, prosecutors and civil society organisations;
- supporting the identification and referral of all presumed and identified child victims;
- monitoring the effectiveness of child-specific procedures within the NRM; and
- promoting consistent application of child protection principles within Ireland's trafficking response; and
- acting as a central contact for cross-border cases involving trafficked children and supporting international cooperation in child protection matters.

(d) Provide specialised training for all bodies participating in the NRM

The effectiveness of the NRM will depend significantly on the capacity of participating agencies to recognise indicators of trafficking and exploitation. Stakeholders repeatedly emphasised the importance of training for professionals involved in identifying and supporting victims, given the expansion of identification responsibilities under the new NRM.

The State, specifically the Department of Justice, Home Affairs and Migration as National Coordinator, in partnership with specialist organisations and experts, should ensure that:

- regular, standardised and specialised training is provided to professionals likely to come into contact with child victims or potential victims, in order to detect and identify them as victims;
- specialised training programmes are developed for all Competent Authorities and Trusted Partners participating in the NRM, including training on child trafficking indicators, ICT-facilitated recruitment and exploitation, child criminal exploitation, child sexual exploitation, and trauma-informed approaches to working with child victims; and
- tailored awareness and specialist training for private sector organisations and industries that may encounter child victims or indicators of trafficking and

exploitation, including those working in transport, hospitality, private security, financial services and digital platforms, is considered where appropriate.

(e) Introduce clear timelines and accountability mechanisms within the NRM

Stakeholders expressed concerns regarding the absence of clear statutory timelines for decision-making within the new NRM. International experience demonstrates that assistance to children should be triggered immediately when concerns are raised that they could be a victim of trafficking and that lengthy identification procedures can leave victims without access to supports and in prolonged uncertainty regarding their status.

The State, specifically the Department of Justice, Home Affairs and Migration as National Coordinator, should ensure that the NRM Operational Guidelines includes:

- clear and realistic timelines for identification decisions;
- mechanisms for monitoring delays; and
- appropriate oversight arrangements.

(f) Strengthen the role of child protection services in identification

International guidance emphasises that child victims of trafficking are often first identified by child protection actors rather than law enforcement, including social workers, educators, healthcare providers and civil society organisations. The new NRM provides an opportunity to strengthen and fully resource the role of Tusla and child protection actors, in the identification of child victims. The review of Children First also provides an opportunity to mainstream child trafficking as a child protection issue.

The State, particularly the Department of Justice, Home Affairs and Migration, Department of Children, Disability and Equality, Tusla and An Garda Síochána, should ensure that:

- child trafficking is viewed as a child protection issue;
- child protection services are fully integrated into the identification process;

- professionals working with children receive specialised training on trafficking indicators;
- referral protocols between child protection and law enforcement are clear, operational and fully resourced; and
- national child protection systems develop specific plans to prevent trafficking in human beings, including that of children in residential or closed-type institutions.⁴⁵⁰

3. Supports and services for child victims

(a) Ensure child victims have immediate access to specialised protection and supports

Children who are victims of trafficking frequently present with complex protection needs, including exposure to violence, coercion, sexual exploitation or criminal exploitation. Effective responses therefore require coordinated child protection, health, social and legal supports delivered through multi-disciplinary cooperation between child protection services, law enforcement, healthcare providers and civil society organisations.

Stakeholders consistently highlighted concerns regarding the availability and accessibility of support services for child victims of trafficking and exploitation, particularly in relation to access to social workers, legal guardians, early access to legal aid, safe accommodation and specialised trauma-informed care.

The State, led by the Department of Justice, Home Affairs and Migration, as National Coordinator, working in partnership with the Department of Children, Disability and Equality, the Department of Education and Youth, the Department of Health, the Department of Housing, Local Government and Heritage, Tusla, the Health Service Executive, the Legal Aid Board and other relevant actors, should ensure that all child victims of trafficking have immediate access to specialised, child-centred support services, including:

⁴⁵⁰ Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims Recital 33.

- safe and appropriate accommodation;
- psychological and trauma-informed care;
- healthcare;
- legal advice and representation;
- education and social integration supports; and
- appropriate specialised after care for 18- to 21-year-olds.

(b) Strengthen the role and resourcing of child protection services

Child protection systems play a central role in the identification and protection of trafficked children. However, insufficient resourcing can undermine the ability of services to respond effectively to suspected cases of exploitation. Many stakeholders raised concerns regarding the capacity of Tusla and other child protection services to respond to child victims of trafficking and at-risk children, particularly unaccompanied minors and those in State care.

The State, particularly the Department of Children, Disability and Equality, should:

- ensure that adequate resources are available to child protection services, including Tusla, to respond to cases involving child trafficking and exploitation;
- prioritise the timely allocation of social workers to at-risk children, unaccompanied minors, including in the international protection process, and all potential child victims; and
- ensure that safety planning for children at risk of trafficking includes specific consideration of trafficking and exploitation risks.

(c) Expand and improve implementation of the Barnahus multi-disciplinary child protection model

The multi-disciplinary Barnahus model is recognised internationally as a good practice approach for supporting child victims of abuse and exploitation. The model brings together law enforcement, child protection, medical and psychological services in a single child-friendly setting to work together in the best interests of the child and to help

prevent further trauma for child victims. While the Barnahus model is not yet fully implemented in some cases in Ireland, the model itself is widely accepted as positive and effective. Barnahus centres currently operate in three locations in Ireland, primarily supporting child victims of sexual violence. However, the model has wider relevance for cases involving child trafficking and exploitation and could significantly improve the experience of child victims in the child protection and criminal justice systems.

The approach adopted by the Centre for Child Victims in Berlin is also of relevance given its focus on early identification and specialised expertise in child trafficking, bringing together specialised police investigators, prosecutors and child protection professionals in coordinated multi-disciplinary teams.

The State, including the Health Service Executive, Tusla and An Garda Síochána, together with other relevant statutory partners where appropriate, should consider:

- strengthening implementation of the Barnahus model in Ireland;
- expanding the Barnahus model nationally, ensuring access across all regions of Ireland;
- assessing whether the model could be adapted to support all child victims of trafficking and exploitation, including cases involving criminal exploitation or labour exploitation; and
- strengthening coordination between Barnahus and the NRM.

(d) Strengthen victim identification and support through the “Social Path” approach

The OSCE has emphasised the importance of a “Social Path” to identification and assistance, which allows victims of trafficking to access protection and support services without requiring immediate engagement with criminal justice processes. This approach recognises that many victims, particularly children, may be reluctant or unable to engage with law enforcement at early stages due to fear, trauma or distrust of authorities. Under the EU Anti-Trafficking Directive, a victim should be provided with assistance and support as soon as there is a reasonable grounds indication for

believing that they might have been trafficked, irrespective of their willingness to act as a witness.⁴⁵¹

The State, led by the Department of Justice, Home Affairs and Migration, as National Coordinator, should ensure that the new National Referral Mechanism reflects the principles of the “Social Path” approach, including:

- enabling referrals to be made by social services, education and healthcare professionals and civil society organisations.
- ensuring that all presumed victims, including children, can access support services without being required to participate in criminal investigations.
- prioritising child protection responses and the best interests of the child.

(e) Review age assessment procedures to ensure child protection safeguards

Stakeholders raised concerns regarding age-assessment procedures, particularly in cases involving unaccompanied minors and children seeking international protection, in light of the implementation of the EU Pact on Migration and Asylum. Incorrect age assessments can have serious consequences for vulnerable children, including the risk that trafficked children may be treated as adults and excluded from child protection systems.

The State, the Department of Justice, Home Affairs and Migration, including the International Protection Office, International Protection Accommodation Services, the Department of Children, Disability and Equality, and Tusla, should ensure that:

- age-assessment procedures are multi-disciplinary and child-sensitive;
- the presumption of minority is applied where age is uncertain;
- children undergoing age assessment have access to early legal and social supports, assistance and appropriate accommodation;

⁴⁵¹ Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims, and replacing Council Framework Decision 2002/629/JHA, Recital 18.

- assessments should be carried out by professionals with expertise in age estimation and child development, with relevant expertise potentially including social workers, psychologists and paediatricians; and
- assessments should take account of physical, psychological, developmental, environmental and cultural factors.

(f) Develop specialised accommodation for child victims of trafficking

Stakeholders highlighted the absence of specialised accommodation for child victims of trafficking, noting that in some cases children at risk of exploitation are not placed in suitable care environments affecting their immediate well-being and long-term recovery. Children who are victims of trafficking may face significant safety risks, including threats from traffickers or the risk of re-trafficking.

The State, specifically the Department of Justice, Home Affairs and Migration, the Department of Children, Disability and Equality, the Department of Housing, Local Government and Heritage, and Tusla, should coordinate policy and activity to establish specialised safe accommodation for child victims of trafficking, and children of adult victims of trafficking.

- This accommodation should:
- be staffed by qualified child protection professionals;
- ensure enhanced safeguarding measures;
- provide specialised trauma-informed support; and
- facilitate access to multi-disciplinary care services.

4. Investigations and prosecutions

(a) Strengthen specialised investigative capacity to address child trafficking

Effective investigations are essential to ensuring accountability for trafficking offences and protecting child victims. Stakeholders highlighted the need for increased capacity

among law enforcement agencies to identify and investigate cases of child trafficking, particularly where exploitation occurs within organised criminal networks.

The State, particularly the Department of Justice, Home Affairs and Migration, An Garda Síochána and the Director of Public Prosecutions, should therefore ensure that additional specialised investigative capacity exists within An Garda Síochána to address child trafficking cases, including those involving multiple forms of exploitation and multiple jurisdictions. Consideration should be given to strengthening dedicated expertise within existing organised crime, cybercrime and trafficking units, ensuring that investigators possess the necessary knowledge and skills to identify trafficking indicators and pursue complex cases and ensure successful prosecutions.

(b) Develop specialised capacity to investigate ICT-facilitated child trafficking

Stakeholders repeatedly emphasised the increasing role of digital technologies in the recruitment, grooming and exploitation of children, including through social media platforms, online forums and gaming environments.

The State, particularly the Department of Justice, Home Affairs and Migration, An Garda Síochána and the Director of Public Prosecutions should address emerging forms of ICT-facilitated trafficking by strengthening the capacity of law enforcement authorities to investigate these crimes, including:

- enhancing training on digital evidence gathering and analysis;
- strengthening investigative capabilities relating to online recruitment and grooming;
- promoting work with technology companies and online platforms; and
- ensuring investigators have access to technical expertise and digital forensic tools.

(c) Provide specialised training for investigators, prosecutors and the judiciary

Stakeholders emphasised the importance of specialised training across the criminal justice system, noting that a lack of awareness regarding trafficking indicators may

contribute to the under-identification of victims and challenges in pursuing prosecutions.

The State, particularly the Department of Justice, Home Affairs and Migration as National Coordinator, in cooperation with relevant bodies and experts, should ensure that specialised training programmes on trafficking in human beings, including child trafficking, are made available to An Garda Síochána, the Office of the Director of Public Prosecutions, members of the judiciary through the Judicial Council, and defence counsel.

Training should include:

- the legal elements of trafficking offences;
- indicators of child trafficking and child criminal exploitation;
- trauma-informed approaches to interviewing child witnesses;
- investigative and evidential challenges associated with ICT-facilitated trafficking; and
- special measures available to child victims.

(d) Ensure consistent application of the non-punishment principle

International and European legal frameworks recognise the non-punishment principle, which provides that victims of trafficking should not be penalised for unlawful acts they were compelled to commit as a direct consequence of their exploitation. Stakeholders raised concerns that children exploited for criminal activities may, in some circumstances, be treated primarily as offenders rather than as potential victims of trafficking or exploitation. Further efforts are needed to prevent secondary victimisation by ensuring that the non-punishment principle is consistently applied, including in cases involving suspected child victims of trafficking.

The State, including the Department of Justice, Home Affairs and Migration as National Coordinator, An Garda Síochána, and the Office of the Director of Public Prosecutions (ODPP) and Tusla should :

- Ensuring the non-punishment principle is enshrined in statute;

- Ensuring prosecutors are familiar with and aware of the guidance on the application of the non-punishment principle, to use it effectively and appropriately;
- Training on recognising indicators and patterns of child criminal exploitation; and
- Ensuring early involvement of child protection services in cases involving children suspected of involvement in criminal activity.

(e) Review cases involving children convicted of offences where trafficking indicators may have been present

Stakeholders expressed concerns that some children involved in criminal activity, particularly drug-related offences, may have been criminally exploited by organised criminal networks and may therefore meet the legal definition of victims of trafficking. Cases involving children convicted of offences where trafficking indicators may have been present should be reviewed. The objective of such a review would be to ensure that children who are victims of criminal exploitation are identified and protected, and that criminal justice responses reflect the child protection and victim-centred principles underpinning international anti-trafficking frameworks.

The State, including the Office of the Director of Public Prosecutions in collaboration with An Garda Síochána and Tusla, should initiate a multi-agency review of cases involving children convicted of certain offences, particularly drug-related offences, to:

- examine whether trafficking indicators were present but not recognised at the time of investigation or prosecution;
- assess whether existing procedures adequately identify children who may be victims of criminal exploitation; and
- identify opportunities to strengthen safeguards within the criminal justice system.

(f) Strengthen protections for child victims during criminal proceedings

Participation in criminal investigations and trials can be particularly challenging for child victims of trafficking. Stakeholders highlighted concerns regarding the potential for re-traumatisation during criminal justice processes despite many recent

improvements for child witnesses including the establishment of a panel of intermediaries.

The State, including the Department of Justice, Home Affairs and Migration, An Garda Síochána and Office of the Director of Public Prosecutions, Tusla, the Courts Service, the Legal Aid Board and other relevant bodies, should ensure that all child victims have access to child-sensitive investigative and court procedures, including:

- specialist child interviewers;
- the use of video-recorded testimony where appropriate;
- immediate access to legal representation and victim support services;
- measures to minimise direct confrontation with defendants; and
- consideration of specialised legal supports for children.

(g) Strengthen access to compensation for victims of trafficking

Access to compensation is an important element of justice and recovery for victims of trafficking. However, stakeholders highlighted challenges relating to the practical accessibility of compensation mechanisms and their general inadequacy.

The State, specifically the Department of Justice, Home Affairs and Migration, should review existing mechanisms for compensation for victims of trafficking to ensure that child victims are able to access compensation in an effective and timely manner, including through:

- improved awareness of compensation mechanisms including the proposed new statutory compensation scheme proposed for victims of crime;
- support for victims in pursuing compensation claims including for pain and suffering; and
- consideration of the potential role of dedicated compensation mechanisms for trafficking victims, in line with international and previous Commission recommendations.

5. Prevention

(a) Strengthen cross-sector training on child trafficking and exploitation

All stakeholders consistently emphasised the importance of training as a core component of prevention efforts, particularly for professionals working with children and vulnerable communities. Improved awareness of trafficking indicators among frontline professionals can contribute to both prevention and early identification of victims.

Training was highlighted at the research validation workshop as the key recommendation and as urgently needed and vital to the functioning of the new NRM.

Training should be available to:

- social workers and child protection professionals;
- educators and school staff;
- healthcare professionals;
- law enforcement officers;
- youth workers and community organisations; and
- relevant private sector professionals working in sectors likely to encounter child victims or indicators of trafficking, including transport, hospitality, private security and digital platforms.

Training programmes should address:

- indicators of child trafficking and exploitation;
- risks associated with ICT-facilitated recruitment and grooming;
- the continuum between grooming, exploitation and trafficking;
- the specific vulnerabilities of children in state care and migrant children; and
- the functioning of the new NRM and referral processes and pathways.

Multi-disciplinary training initiatives should also be encouraged to facilitate cooperation between all agencies and civil society involved in child protection and anti-trafficking responses.

It was suggested that a Training Sub-Committee be established under the NRM and NAP to coordinate efforts for training of Competent Authorities and Trusted Partners.

The State, including the Department of Justice, Home Affairs and Migration, Department of Education and Youth, the Department of Children, Disability and Equality, and the Health Service Executive and Tusla, should:

- promote quality training for all professionals working with children;
- establishing such a sub-committee to oversee training;
- expand cross-sector training programmes on child trafficking and exploitation,

(b) Expand education and digital literacy initiatives for children

Given the increasing role of digital technologies in the recruitment and exploitation of children, prevention strategies must include education and digital literacy initiatives targeted at children and young people. Ireland has recently introduced online safety modules in the primary school curriculum, which is a welcome development. However, stakeholders emphasised the importance of ensuring that education on online safety, grooming and exploitation is embedded within the education system in a sustained and age-appropriate manner. International good practice demonstrates the value of embedding media literacy and critical thinking skills within school curricula and awareness campaigns from an early age.

The State, particularly the Department of Education and Youth and its agencies, should:

- expand the integration of digital safety, media literacy and online exploitation awareness within school curricula, as well as for those not in formal education;
- provide teachers with the necessary training and educational resources to deliver these programmes effectively; and
- ensure that education and awareness initiatives address the risks associated with online grooming, recruitment and exploitation including for young children.

(c) Support community-based prevention and awareness initiatives

Stakeholders highlighted the important role played by community organisations, youth services and civil society organisations in raising awareness of child trafficking and exploitation and in supporting vulnerable children. Community-based initiatives are often well positioned to reach at-risk children and families, particularly in areas where children may be exposed to criminal exploitation or online grooming.

The State, including the Department of Justice, Home Affairs and Migration as National Coordinator, in partnership with An Garda Síochána, Department of Children, Disability and Equality and Department of Education and Youth should continue to support community-led prevention initiatives, including programmes delivered in:

- youth centres;
- community organisations; and
- local schools and educational settings.

Such initiatives should be designed to ensure that information about trafficking risks is accessible and age-appropriate, particularly for children and young people.

(d) Ensure transparent and equitable funding for awareness-raising initiatives

Stakeholders highlighted concerns regarding the transparency and accessibility of funding for anti-trafficking awareness initiatives, including uncertainty regarding application procedures and the allocation of funding. The Department of Justice, Home Affairs and Migration as National Coordinator, plays an important role in funding and supporting awareness-raising initiatives.

The State, including the Department of Justice, Home Affairs and Migration, should strengthen prevention efforts and maximise the impact of awareness raising campaigns by ensuring that:

- a clear and transparent application process is established for organisations seeking annual or multi-annual funding for child trafficking awareness-raising initiatives;

- information regarding funding opportunities is widely disseminated to civil society organisations and community groups; and
- funding mechanisms support a diverse range of initiatives and organisations, including those working directly with vulnerable communities.

(e) Strengthen measures to reduce vulnerability to child trafficking

Prevention strategies should also focus on reducing the vulnerability of children who may be at heightened risk of exploitation, including children in State care, unaccompanied minors and children experiencing social or economic disadvantage. Addressing vulnerability factors can significantly reduce the risk of children becoming victims of trafficking or exploitation and the risk of re-trafficking.

The State, including the Department of Children, Disability and Equality, and Tusla should:

- develop targeted prevention strategies for children in state care and children in residential accommodation;
- ensure that risk assessments conducted by child protection services include specific consideration of trafficking and exploitation risks; and
- strengthen cooperation between child protection services, community organisations and law enforcement authorities in responding to children at risk of exploitation.

(f) Strengthen efforts to reduce demand for exploitation

Reducing demand for the exploitation of trafficked persons remains an important element of prevention strategies. Ireland has introduced a number of legislative measures designed to address demand, including legislation criminalising the purchase of sexual services and the grooming of children for criminal activities.

Addressing demand can contribute to reducing the incentives for traffickers and exploiters.

The State, including the Department of Justice, Home Affairs and Migration and Department of Education and Youth, should continue to evaluate the effectiveness of these measures and consider additional awareness raising and educational initiatives aimed at addressing demand for exploitation, including:

- public awareness campaigns highlighting the harms associated with exploitation and trafficking; and
- initiatives aimed at discouraging the use of services linked to exploitation, particularly where children may be involved.

(g) Strengthen prevention strategies addressing ICT-facilitated exploitation

The increasing use of digital technologies by traffickers requires prevention strategies that address the online dimension of trafficking and exploitation. Prevention strategies should recognise that the digital environment has become a key space in which traffickers identify, recruit and exploit children.

The State, including the Department of Justice, Home Affairs and Migration, Department of Enterprise, Tourism and Employment and Department of Education and Youth in collaboration with Coimisiún na Meán, should strengthen prevention initiatives addressing ICT-facilitated child trafficking, including:

- awareness campaigns directed at parents, educators, children and young people addressing online grooming and recruitment practices;
- collaboration with technology companies and online platforms to reduce risks to children; and
- education initiatives promoting safe online behaviours and digital resilience among children and young people.

6. Partnerships

(a) Strengthen international cooperation in combatting child trafficking

Trafficking in human beings frequently involves cross-border criminal networks, and effective responses require strong cooperation between national authorities and international partners. Stakeholders highlighted strong existing international cooperation between police and prosecutors enhanced by Eurojust and Europol and the importance of maintaining and strengthening cooperation with European and international agencies involved in combatting trafficking and organised crime.

The State, including the Department of Justice, Home Affairs and Migration and particularly An Garda Síochána, and the Office of the Director of Public Prosecutions, should continue to strengthen international cooperation mechanisms relating to child trafficking, including through:

- strong engagement with EU and international bodies involved in combatting trafficking and organised crime;
- participation in Joint Investigation Teams and information sharing mechanisms including via opting into EU Directives;
- enhanced cooperation with law enforcement and child protection authorities in other jurisdictions; and
- information exchanges relating to ICT-facilitated recruitment and exploitation of children, including emerging online trends and investigative techniques.

(b) Strengthen cross-border cooperation between Ireland and Northern Ireland

Stakeholders highlighted the importance of cooperation between authorities in Ireland and Northern Ireland, particularly in cases involving missing children, organised criminal networks and cross-border movements of vulnerable children.

Stakeholders also emphasised the value of direct cooperation between civil society organisations operating in Ireland and Northern Ireland, particularly those working with children and migrant communities. Such cooperation can facilitate the sharing of

expertise, the identification of cross-border risks and the development of coordinated responses to child trafficking and exploitation.

The State, including An Garda Síochána, Tusla, the Department of Justice, Home Affairs and Migration, and the Department of Children, Disability and Equality should continue to strengthen cross-border cooperation mechanisms with relevant authorities in Northern Ireland and the United Kingdom, including:

- information sharing relating to missing children and children at risk of exploitation;
- cooperation between law enforcement agencies in investigations involving trafficking or organised criminal networks; and
- coordination between child protection services where vulnerable children move between jurisdictions.

(c) Strengthen national multi-agency cooperation

Effective responses to child trafficking require strong cooperation between a wide range of actors, including law enforcement, child protection services, Government departments, independent agencies and civil society organisations. The new NRM provides an opportunity to strengthen multi-agency coordination by bringing together relevant authorities responsible for identifying and supporting victims of trafficking.

The State, particularly the Department of Justice, Home Affairs and Migration as National Coordinator, should ensure that national coordination mechanisms:

- promote effective communication and information sharing between agencies;
- support multi-disciplinary responses to cases involving child trafficking and exploitation; and
- facilitate the exchange of expertise between professionals working in different sectors.

(d) Strengthen engagement with civil society organisations

Civil society organisations play an essential role in preventing trafficking, identifying victims and providing support services to vulnerable children. Stakeholders highlighted

the important contributions made by organisations working in areas such as child protection, anti-trafficking, migrant support services and online safety.

These organisations often possess specialised expertise and are frequently among the first actors to encounter vulnerable children or potential victims of exploitation. They require adequate, accessible multi-annual resourcing.

Enhanced collaboration with civil society organisations can contribute to:

- improved identification of victims;
- more effective prevention initiatives; and
- stronger protection and support services for child victims.

The State, including the Department of Justice, Home Affairs and Migration and the Department of Children, Disability and Equality, should strengthen engagement with civil society organisations, particularly those working in:

- child protection and safeguarding.
- combatting child trafficking and exploitation.
- support services for migrant and unaccompanied children.
- children's online safety and digital protection.

(e) Ensure meaningful consultation with civil society, survivors and experts in policy development

Stakeholders emphasised the importance of ensuring that civil society organisations are meaningfully involved in the development and evaluation of anti-trafficking policies and strategies. Meaningful and ethical consultation with survivors and civil society organisations can help ensure that policy responses are informed by frontline experience and emerging trends, including those relating to ICT-facilitated trafficking.

The State, particularly the Department of Justice, Home Affairs and Migration as National Coordinator, should ensure that structured consultation mechanisms exist and are sustained so as to facilitate engagement with civil society organisations working in areas relevant to child trafficking and exploitation. This should include organisations and experts that are not formally represented in the new NRM including those with

expertise in combatting child trafficking and those working in child protection, migrant support services and children's online safety, given the increasing role of digital technologies in trafficking and exploitation.

(f) Strengthen partnerships with the private sector to address online exploitation

Given the increasing role of digital technologies in the recruitment and exploitation of children, partnerships with the private sector, particularly technology companies and online platforms, are an important component of prevention and protection strategies.

The State, particularly the Department of Justice, Home Affairs and Migration as National Coordinator, working in collaboration with Coimisiún na Meán and other relevant Government departments, should strengthen engagement with relevant private sector actors to address risks associated with ICT-facilitated child trafficking, including:

- cooperation with online platforms to identify and respond to exploitative content and grooming behaviour;
- engagement with technology companies to improve online safety measures for children; and
- engagement with industry initiatives aimed at addressing online exploitation and abuse.

7. Data collection and evidence-based policy

(a) Strengthen national data collection on child trafficking

Reliable and comprehensive data is essential to understanding the scale, nature and trends of child trafficking and to developing effective prevention and protection strategies. Stakeholders noted that the relatively low number of officially identified child victims in Ireland may reflect under-identification rather than a low incidence of trafficking. There is an opportunity under the new NRM to enhance data collection of presumed and identified child victims. Improved data collection in compliance with GDPR will assist policymakers in developing more targeted and effective responses to child trafficking and exploitation.

The State including the Department of Justice, Home Affairs and Migration as National Coordinator, and the relevant Government departments and statutory bodies (particularly those bodies engaged in the new NRM) should strengthen national data collection systems relating to trafficking, including child trafficking, ensuring that data collection mechanisms are fully GDPR compliant. In line with the amended EU Directive, this should capture information on:

- the number of child victims referred;
- the number of child victims subsequently formally identified;
- the type of exploitation involved;
- the gender, nationality and age of child victims; and
- outcomes relating to investigations, prosecutions and child victim supports.

(b) Ensure trafficking for sexual exploitation is consistently recorded as child trafficking

Stakeholders raised concerns regarding the classification of certain cases involving sexual exploitation of children, noting that such cases may be recorded as child sexual exploitation rather than as trafficking offences where trafficking indicators may be present. While child sexual exploitation and trafficking are distinct offences, trafficking may occur where a child has been recruited, harboured or received for the purpose of exploitation, including sexual exploitation. Improving the accuracy of data in this area is important for understanding the true prevalence of child trafficking in Ireland.

The State, coordinated by the Department of Justice, Home Affairs and Migration as National Coordinator, working with the Department of Children, Disability and Equality, Tusla, the Health Service Executive, and other relevant Government departments and statutory bodies, should ensure that data collection systems allow for the accurate identification and recording of child trafficking cases, including those involving sexual exploitation. Clear guidance should be provided to relevant authorities to ensure that cases meeting the legal definition of trafficking are recorded accordingly, rather than solely under broader categories of child sexual exploitation.

(c) Collect data on both presumed and formally identified victims

The new NRM will introduce a distinction between presumed victims and formally identified victims of trafficking, which reflects international practice and may assist in improving early identification of victims. Collecting data on presumed victims, whether they enter into the NRM or not, will help provide a more accurate picture of trafficking trends and will allow policymakers to better understand the scale of potential victimisation, even in cases where formal identification has not yet occurred.

The State, led by the Department of Justice, Home Affairs and Migration as National Coordinator, should ensure that national data systems capture information relating to both presumed and confirmed victims of trafficking, including child victims.

(d) Resource and establish clear responsibility for the collection and analysis of trafficking data

Stakeholders highlighted the importance of ensuring that responsibility for data collection and analysis is clearly assigned within the national anti-trafficking framework. A centralised and GDPR compliant approach to data collection would support greater consistency, transparency and comparability and protection of trafficking data including with other jurisdictions.

The State, led by the Department of Justice, Home Affairs and Migration as National Coordinator should consider assigning responsibility for collecting, analysing and publishing data on child trafficking to an appropriate body within the new NRM framework.

(e) Strengthen research and monitoring relating to child trafficking

Stakeholders highlighted the importance of developing a stronger evidence base relating to child trafficking and exploitation in Ireland, including emerging risks linked to digital technologies. Improved data collection in compliance with GDPR will assist

policymakers in developing more targeted and effective responses to child trafficking and exploitation.

Research has been commissioned by the National Coordinator and the Ombudsman for Children Office, but further strengthening the evidence base will assist policymakers, practitioners and researchers in developing more effective strategies to prevent trafficking and support child victims.

The State, including the Department of Justice, Home Affairs and Migration as National Coordinator, should support further research examining:

- the extent and nature of child trafficking in Ireland;
- patterns of child criminal exploitation;
- vulnerabilities among children in state care or migration contexts;
- how State care can be strengthened; and
- the growing role of ICT-facilitated recruitment and exploitation.

(f) Support monitoring and evaluation of national anti-trafficking policies

Effective anti-trafficking responses require ongoing monitoring and evaluation of policies and programmes. The NAP includes provisions for periodic review, which provide an opportunity to assess progress in addressing child trafficking.

Regular evaluation of policies and programmes and updating of the NAP, will help ensure that Ireland's response to child trafficking remains evidence-based and responsive to emerging trends.

The State, led by the Department of Justice, Home Affairs and Migration as National Coordinator, should ensure that monitoring and evaluation mechanisms include specific consideration of child trafficking and ICT-facilitated exploitation, including:

- prevention initiatives;
- victim identification mechanisms; and
- support services for child victims.

8. Conclusion

This research highlights both the complexity and urgency of addressing child trafficking and ICT-facilitated child trafficking in Ireland. While important legislative, policy and operational developments have taken place in recent years, significant challenges remain, particularly in relation to child protection, the identification of, and supports to, child victims, the under-recognition of Irish children as victims, and the growing impact of digital technologies on recruitment and exploitation.

A central finding of this report is that child trafficking and ICT-facilitated child trafficking is likely substantially under-identified in Ireland. This is influenced by a combination of factors, including misunderstandings of the legal definition of child trafficking, a historical focus on migration-related cases, and the absence of a fully resourced and effective multi-agency National Referral Mechanism. At the same time, the research underscores that certain forms of exploitation, in particular child trafficking for sexual exploitation (including ICT-facilitated exploitation) and child trafficking for criminal exploitation, represent key areas of concern.

The report sets out a comprehensive suite of recommendations across the areas of legislative reform, identification, protection, prosecution, prevention, partnerships and data collection. Taken together, these recommendations provide a clear and actionable roadmap to strengthen Ireland's response. Central to this is the need to operationalise the new National Referral Mechanism with a strong and clear child-specific focus, rooted in child protection and providing access to a full range of appropriate support services. Other priority areas are the need to ensure consistent application of the legal definition of child trafficking, and investment in training, awareness raising, and digital literacy to address emerging risks in the online environment. Stakeholders placed particular emphasis on the need for training of all actors involved in the national response to child trafficking.

Future potential areas for consideration for research and policy attention include child trafficking for sexual exploitation, including ICT-facilitated grooming, recruitment and exploitation, and child trafficking for criminal exploitation, particularly in the context of drug distribution networks.

Strengthened information, data collection and research on the protection of vulnerable and at-risk children is also needed, particularly for unaccompanied minors, children in State care and other at-risk groups.

Importantly, the findings also point to strong foundations on which to build.

Stakeholders demonstrated a high level of engagement, expertise and commitment to improving national responses to child trafficking. Positive developments such as the statutory footing of the National Referral Mechanism, increased focus on online safety, and examples of national and international good practice provide a basis for meaningful progress.

With sustained commitment, coordination and investment, Ireland is well positioned to strengthen its systems for identifying and protecting child victims, to respond effectively to evolving forms of exploitation, and to ensure that all children, regardless of their background are safeguarded from trafficking and exploitation.

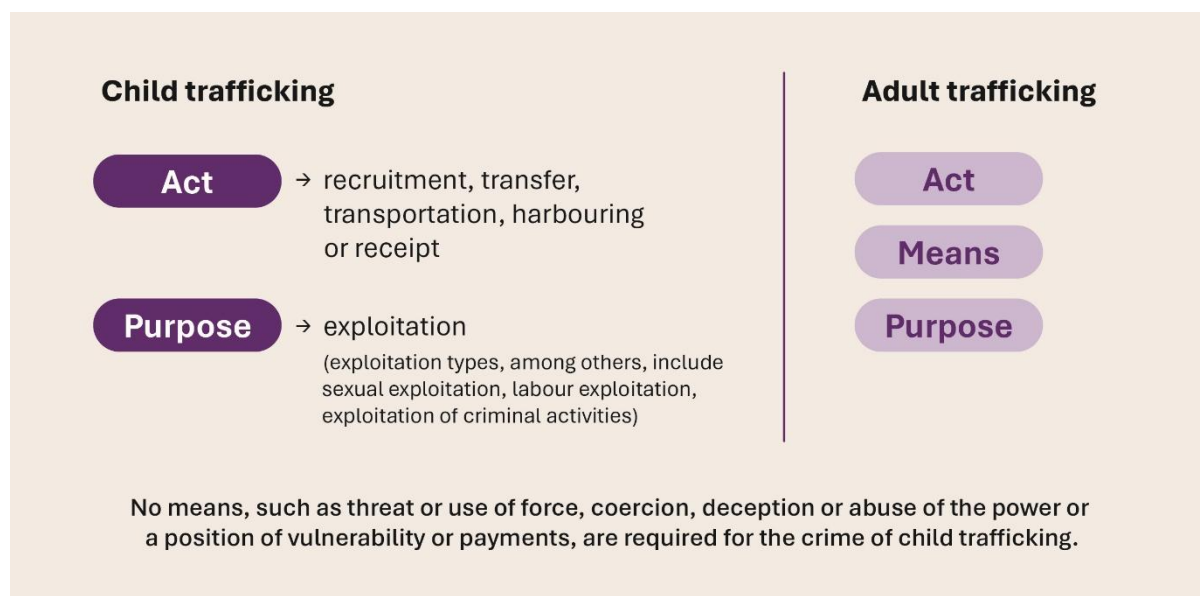
Annex 1. Child Trafficking Factsheet

What is child trafficking?

Definition of child trafficking

Child trafficking is the recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation.⁴⁵² A child is defined as any person under 18 years of age.⁴⁵³ Child trafficking is a serious criminal offence and a grave violation of a child's human rights.

Key elements of child trafficking



The elements of child trafficking differ to those of trafficking in adults. The elements of child trafficking are the **act** (recruitment, transportation, transfer, harbouring or receipt) and the **purpose** (exploitation).

The crime of trafficking in adult human beings requires an act, a means and a purpose.⁴⁵⁴ No means, such as threats, coercion or bribes, are required for the crime of child trafficking, but this does not mean that these things do not occur to child victims.

⁴⁵² United Nations, General Assembly Resolution 55/25, 14 November 2000, [Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime \(Palermo Protocol\)](#), Article 3(a), (c)&(d).

⁴⁵³ *ibid* Article 3(d).

⁴⁵⁴ *ibid* Art 3(a) "Trafficking in persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons (**act**), by **means** of the threat or use of force or other forms of coercion, of abduction,

Human trafficking, including child trafficking, does not require any movement. A child can be trafficked without ever leaving their home or community. The recruitment of a child for an exploitative purpose is sufficient to constitute the crime of child trafficking.

What are the forms of child trafficking in Ireland?

Children are trafficked for the purpose of exploitation.

This exploitation can take various forms including, but not limited to:

- sexual exploitation;
- criminal exploitation;
- labour exploitation (including domestic servitude and forced begging);
- organ removal;
- forced marriage;
- illegal adoption; and
- exploitation of surrogacy (where the surrogate is a child).

Child trafficking for sexual exploitation is criminalised under the Child Trafficking and Pornography Act 1998,⁴⁵⁵ and labour exploitation and organ removal are trafficking crimes under the Criminal Law (Human Trafficking) Act 2008.⁴⁵⁶ The Criminal Law (Human Trafficking) (Amendment) Act 2013 expanded the forms of child exploitation to include trafficking for forced criminality and forced begging.⁴⁵⁷ The EU's Anti-Trafficking legislation was amended in 2024, adding specific new trafficking offences of surrogacy, forced marriage and illegal adoption. The Directive also identifies children as especially vulnerable to trafficking and strengthens Member States responsibilities to address child trafficking.⁴⁵⁸

of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the **purpose** of exploitation.

⁴⁵⁵ [Child Trafficking and Pornography Act 1998](#), s3.

⁴⁵⁶ [Criminal Law \(Human Trafficking\) Act 2008](#), s1-4.

⁴⁵⁷ [Criminal Law \(Human Trafficking\) \(Amendment\) Act 2013](#), s1.

⁴⁵⁸ Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Arts 2(1), 2(3), 2(5) & 2(6).

In Ireland, sexual exploitation is the most commonly identified form of child trafficking, but there is increasing concern among stakeholders regarding criminal exploitation, (particularly involving children in drug-related activities) and the risks to children of ICT-facilitated trafficking, grooming and exploitation. Child victims of trafficking for labour exploitation have also been identified in Ireland.

How are child victims of trafficking identified?

Currently suspected child victims of trafficking are referred to An Garda Síochána for formal identification. The Administrative Immigration Arrangements⁴⁵⁹ set out the process that applies to victims who do not have permission to reside in the State. In July 2024, a new National Referral Mechanism (NRM) was placed on a statutory footing for the first time.⁴⁶⁰ However as of May 2026 this has not been commenced. The NRM will allow for the referral and formal identification of child victims by Tusla, and other State agencies (Competent Authorities) and civil society organisations (Trusted Partners) who will form part of the new Operational Committee.⁴⁶¹ Although there is no statutory child-specific NRM, provision is made for guidelines on child-specific procedures for identification and support of child victims and presumed child victims of human trafficking to be issued.⁴⁶² However these procedures and the operational guidance required under the Act have not been issued.

Under the amended EU Anti-Trafficking Directive, Member States are required to have an NRM and should promote or offer regular and specialised training to professionals likely to come into contact with children, to detect and identify them as victims.

Key challenges relating to the identification of child victims of trafficking include:

- low awareness and understanding of child trafficking among the public and professionals working with children;
- confusion between trafficking, exploitation and grooming;
- over-reliance on immigration-based identification systems;

⁴⁵⁹ Department of Justice, Equality and Law Reform (2011) [Administrative Immigration Arrangements for the Protection of Victims of Trafficking](#).

⁴⁶⁰ [Criminal Law \(Sexual Offences and Human Trafficking\) Act 2024](#), Part 3.

⁴⁶¹ *ibid*, Part 3, Section 22.

⁴⁶² *ibid*, Part 3, Section 23(1)(iv).

- failure to recognise Irish children as potential victims; and
- children being treated as offenders rather than victims, particularly in cases of criminal exploitation.

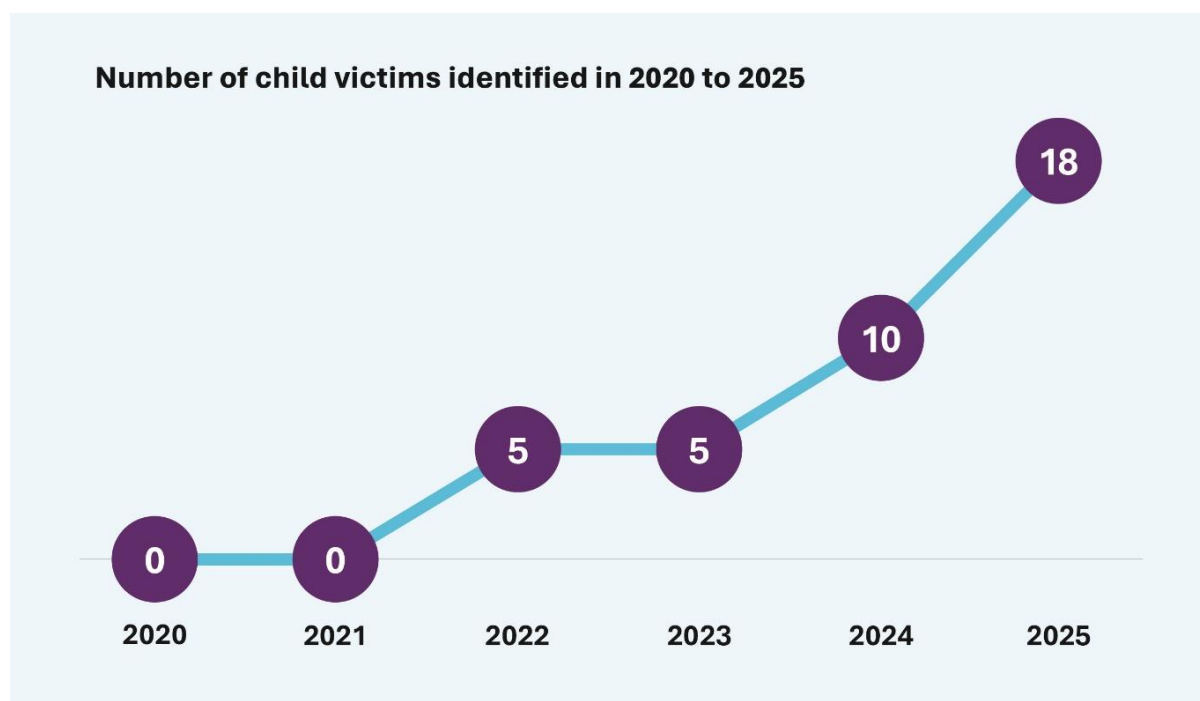
Improving identification is critical to ensuring that children receive appropriate protection and support.

How widespread is child trafficking in Ireland?

As child trafficking is a hidden crime, it is often under-reported and under-identified. It is generally accepted that the number of children who are victims of trafficking is higher than low official figures.

Number of child victims

Numbers of children identified as victims of trafficking in Ireland are low by international standards.

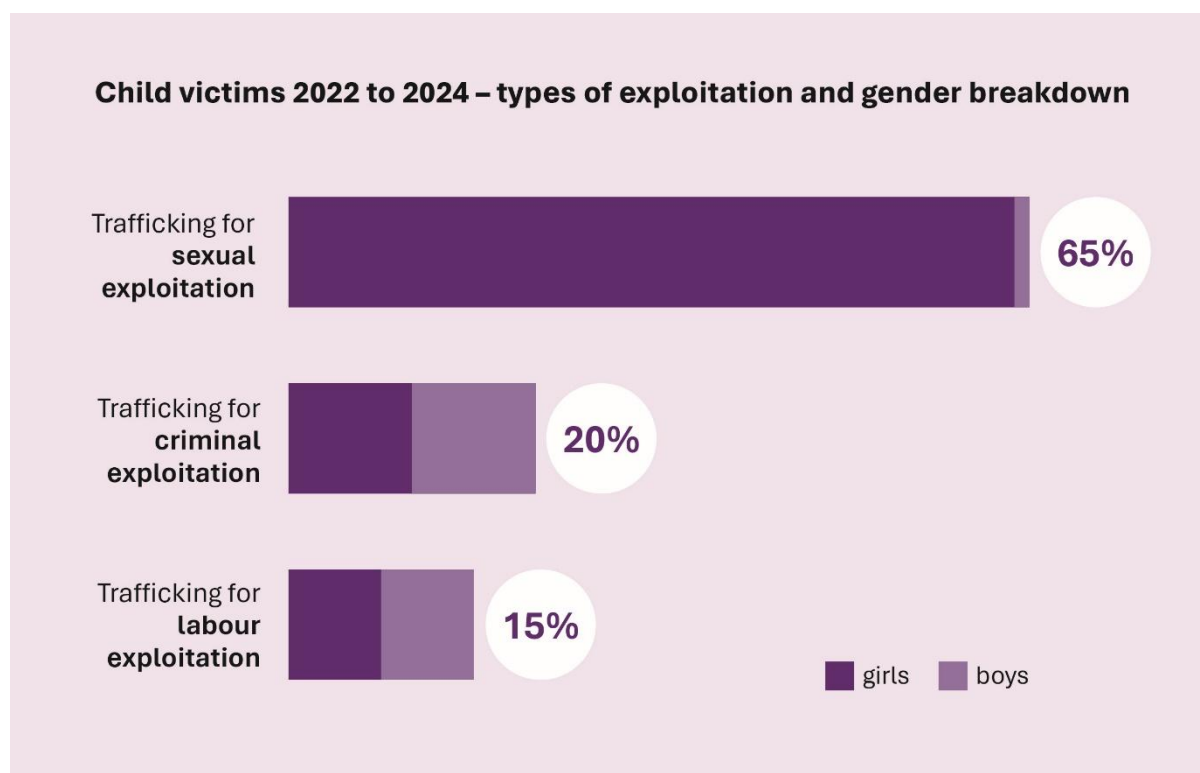


No child victims of trafficking were identified in 2020 and 2021. However, numbers have increased in recent years. Five child victims were identified each year in 2022 and 2023

with 10 child victims identified in 2024.⁴⁶³ 18 child victims of trafficking were officially identified in 2025.⁴⁶⁴

Type of exploitation and gender breakdown

A total of 38 child victims of trafficking were identified from 2022 to 2025. The gender breakdown of the child victims from 2022 to 2024 was 80% girls and 20% boys. The types of exploitation and gender breakdown include: trafficking for sexual exploitation (65%), predominantly affecting girls, trafficking for criminal exploitation (20%), affecting equal numbers of boys and girls, and trafficking for labour exploitation (15%), affecting both genders.⁴⁶⁵



While no gender or exploitation breakdown is available for 2025, it is understood that there were cases of sexual exploitation, labour exploitation in nail bars and car washes, forced criminality and forced begging.

⁴⁶³ Irish Human Rights and Equality Commission (2025), [Ireland's Actions Against Trafficking in Human Beings: Submission to the Council of Europe Group of Experts on action against Trafficking in Human Beings \(GRETA\) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings Fourth Evaluation Round](#), p8.

⁴⁶⁴ [Human Trafficking Dáil Éireann Debate, Tuesday - 24 February 2026](#).

⁴⁶⁵ [ibid.](#)

Nationality of child victims

To date child victims of trafficking have been identified mainly through the immigration system and none of the recently identified victims are Irish children. The failure to identify Irish or Irish resident child victims has attracted national and international criticism and does not align with UK or EU statistics which indicate that approximately 80% of child victims are nationals of and suffer exploitation within their own country.⁴⁶⁶

Trafficking and exploitation risk factors

While it is possible for any child to become a victim of trafficking or exploitation, a number of factors and circumstances mean that some children are more at risk than others.

The European Commission⁴⁶⁷ highlights the following risk factors:

- migration, particularly for unaccompanied minors;
- children in residential care or other institutions;
- poverty;
- social exclusion;
- low education levels;
- members of a minority ethnic group;
- having a disability;
- suffering discrimination;
- gender (with girls and boys often vulnerable to different forms of exploitation);
- and
- unsupervised access to the internet.

⁴⁶⁶ Independent Anti-Slavery Commissioner & ECPAT UK (2025), [Child Trafficking in the UK 2024: A snapshot](#), p8 and European Commission (2025), [Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the progress made in the European Union in combating trafficking in human beings \(Fifth Report\)](#), p6.

⁴⁶⁷ European Commission (2021), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy on Combatting Trafficking in Human Beings 2021- 2025, Com(2021) 171 final (EU Strategy on Combatting Trafficking in Human Beings), paras 1, 4.3 & 5 and Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Recital 7.

Research highlights particular concerns regarding children:

- in care being targeted for sexual exploitation;
- being groomed into criminal activity, sometimes by peers or family members;
and
- going missing from care and being exploited across jurisdictions.

How are children recruited?

Some examples of how children can become victims of trafficking are:

- by grooming (in person or online via social media or gaming platforms);
- by their family or relatives;
- by their peers;
- by coercion, debt bondage and control; and
- while migrating into Ireland or travelling within Ireland.

Trafficking often involves manipulation and control, rather than overt force. In many cases, children may not recognise themselves as victims.

Supports and services to child victims

A child-centred approach should be taken by all persons dealing with child victims of trafficking where a child's best interests are the primary concern and they are treated as full rights holders. Child victims of trafficking are entitled to a range of supports from State agencies. Supports include:

- social workers – provided by Tusla;
- psychological and health supports – provided by the HSE;
- education – provided by the department of education;
- accommodation and care;
- legal assistance – provided by the legal aid board;
- investigative Child Specialist Interviewers– provided by An Garda Síochána; and
- In-trial supports – special measures such as intermediaries and video testimony.

What are the signs that a child might be a victim of trafficking?

Children are unlikely to self-identify as victims of trafficking. There are signs and vulnerabilities that may present.

An Garda Síochána lists a range of potential indicators that a child might be a victim of trafficking.⁴⁶⁸

For example, the child might:

- have no access to their parents or guardians;
- look intimidated and behave in a way that is not typical of children their age;
- have no friends of their own age;
- have no access to education;
- have no time for playing;
- live apart from other children and in substandard accommodations;
- eat apart from other members of the ‘family’;
- be given only leftovers to eat;
- be engaged in work that is not suitable for children;
- travel unaccompanied by adults; and
- travel in groups with persons who are not relatives.

An Garda Síochána note that other physical indicators that a child might have been trafficked are the:⁴⁶⁹

- presence of child-sized clothing typically worn for doing manual or sex work;
- presence of toys, beds and children’s clothing in inappropriate places such as factories;
- claim made by an adult that he or she has “found” an unaccompanied child;
- finding of unaccompanied children carrying telephone numbers for calling taxis; and
- discovery of cases involving illegal adoption.

⁴⁶⁸ An Garda Síochána, Blue Blindfold: <https://www.blueblindfold.ie/child-trafficking/>.

⁴⁶⁹ *ibid.*

Early identification depends on awareness among professionals, communities and families.

MECPATHS⁴⁷⁰ highlight that while there is no single indicator that a child is a victim of trafficking, generally it is a combination of behavioural, physical and social and indicators:

- Physical Appearance: Signs of physical abuse, neglect, or lack of age-appropriate clothing.
- Personality/Mood Changes: The child appears anxious, fearful, depressed, withdrawn, or has significantly changed in temperament.
- Control/Isolation: The child seems dominated by another person, has no access to a mobile phone or internet, is constantly monitored, or is escorted everywhere.
- Runaway Behaviour: A history of running away, going missing from home, or expressing fear of returning home.
- Sexualised Behaviour: Using sexual language inappropriate for their age or presenting with early/unwanted pregnancy.
- Markings: Possessing tattoos or other marks that may indicate 'ownership'.
- Family Involvement: A child may come from a community where 'honour' or forced marriage is embedded, or they may announce an engagement to a stranger.
- Educational Issues: Noticeable absenteeism, sudden drop in performance, or removal from school.
- Isolation: Becoming estranged from family or friends.
- Unusual Travel: Talking about family holidays abroad while appearing anxious or not returning from a visit to a country of origin.

⁴⁷⁰ MECPATHS, Child Trafficking Indicators, Know it, See it, Say it: https://mecpaths.com/wp-content/uploads/2023/09/MECPATHS_Indicator-Booklet_2023c.pdf

Dispelling common misconceptions about child trafficking

Child trafficking:

- happens in Ireland;
- happens to girls and boys;
- can happen to Irish children living in Ireland and abroad;
- occurs regardless of the ‘consent’ of a child;
- is a form of child exploitation but not all child exploitation is child trafficking;
- is not the same as smuggling which involves illegal entry into a country; and
- does not require movement within Ireland or any cross-border or international travel.

Key challenges

This research highlights several key challenges in Ireland’s response:

- Under-identification of child victims, including Irish children;
- lack of a fully operational child-specific NRM or child-specific procedures with significant impacts from a child rights perspective;
- gaps in training and awareness across sectors;
- increasing risks linked to ICT-facilitated exploitation;
- issues with child protection and supports, including potential targeting of children in state care and facilities;
- insufficient recognition of criminal exploitation as trafficking; and
- weaknesses in data collection and evidence.

Key priorities

To strengthen Ireland’s response, key priorities include:

- improving identification systems, including for children living in Ireland;
- fully operationalising the National Referral Mechanism with a child-specific approach for identification, protection and supports;

- expanding training and awareness raising across all sectors;
- strengthening responses to ICT-facilitated trafficking;
- enhancing protection, supports and services for child victims;
- improving data collection and research; and
- strengthening multi-agency, national and international cooperation.

Conclusion

Child trafficking in Ireland remains a serious but under-recognised issue. While progress has been made, significant gaps remain in the identification, protection and prevention of child trafficking. Ireland has strengthened obligations in regard to addressing child trafficking under the amended EU Anti-Trafficking Directive 2024.

At the same time, there are strong foundations for improvement. With the introduction of a statutory National Referral Mechanism, increased awareness of digital risks, and growing engagement across sectors, Ireland is well positioned to strengthen its response.

A coordinated, child-centred and evidence-based approach which includes education and training will be essential to ensuring that all children are protected from trafficking and exploitation, both offline and online.

Annex 2. ICT-Facilitated child trafficking factsheet

What is ICT-facilitated child trafficking?

ICT-facilitated child trafficking occurs when information and communication technologies (ICT) are used at any point in the trafficking of a person under 18 years of age, for example in the recruitment, transfer, harbouring or receipt of the child for the purposes of exploitation, or in their exploitation.⁴⁷¹ ICT can be used to monitor and control victims and for the creation and distribution of child sexual abuse material. ICT can include social media, messaging platforms, online gaming and digital tools. ICT-facilitated trafficking is not a separate legal category of trafficking, but rather a way in which trafficking, particularly the recruitment and sexual exploitation of child victims, is carried out. As with all forms of child trafficking, movement is not required, and the online recruitment of a child for the purpose of exploitation is sufficient to constitute an offence. Under the amended EU Anti-Trafficking Directive, the use of ICT to disseminate sexual images or videos of the victim, is to be considered an aggravating offence.⁴⁷²

Why is ICT-facilitated trafficking a growing concern?

Digital technologies have significantly transformed how traffickers operate. International organisations, including the Organization for Security and Co-operation in Europe (OSCE), have highlighted how traffickers now only require basic digital tools to identify and exploit victims.⁴⁷³ International evidence indicates that ICT has accelerated and increased trafficking activity, allowing perpetrators to cast a wide net rather than targeting individual victims

⁴⁷¹ United Nations, General Assembly Resolution 55/25, 14 November 2000, [Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime \(Palermo Protocol\)](#), Art 3(c). The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered “trafficking in persons” even if this does not involve any of the means set forth in subparagraph (a) of this article; (d) “Child” shall mean any person under eighteen years of age.

⁴⁷² Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims. (Amended EU Anti-Trafficking Directive), Recital 10.

⁴⁷³ Organization for Security and Cooperation in Europe (2024), [Policy action to address technology-facilitated trafficking in human beings Report of the regional consultations led in 2023 by the OSCE’s Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings](#), p7.

over time, as organised crime groups have rapidly adapted to make use of and exploit developments in digital technology.⁴⁷⁴ The delayed recognition at policy and operational level of the scale and impact of ICT in facilitating child trafficking in Ireland and across Europe has also been cited as a concern.⁴⁷⁵

The internet and technology enables:

- rapid, large-scale recruitment of children;
- increased anonymity for perpetrators;
- continuous access to children in private spaces; and
- greater capacity to manipulate and control victims remotely.

Legal and policy context

The amended EU Anti-Trafficking Directive reflects the growing importance of ICT in the response to trafficking and the online grooming and exploitation of children.

It provides that:

- the use of ICT in trafficking offences, specifically in the distribution of sexual images of a trafficked person, including child victims, should be treated as an aggravating factor in sentencing;⁴⁷⁶
- member states must ensure that law enforcement and prosecutors have the necessary technical capacity digital skills and expertise;⁴⁷⁷ and
- prevention measures should include digital literacy, awareness raising and education.⁴⁷⁸

⁴⁷⁴ See for example: Organization for Cooperation and Security in Europe (2024), [New Frontiers: The Use of Generative Artificial Intelligence to Facilitate Trafficking In Persons, Policy Brief, November 2024](#), Organization for Cooperation and Security in Europe (2024), [New Frontiers: The Use of Generative Artificial Intelligence to Facilitate Trafficking In Persons, Policy Brief, November 2024](#).

⁴⁷⁵ See for example: Organization for Security and Co-operation Organization for Security and Co-operation in Europe (2020), [Leveraging Innovation to Fight Trafficking in Human Beings: A Comprehensive Analysis of Technology Tools](#), Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims. (Amended EU Anti-Trafficking Directive).

⁴⁷⁶ Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Art 4(3)(b).

⁴⁷⁷ [ibid](#), Art 9(3).

⁴⁷⁸ [ibid](#), Art 18(1) & 18a.

The Directive also introduces provisions relating to the liability of, and sanctions on, legal persons, which encompasses technology companies.⁴⁷⁹

Concerns exist as to whether existing legislative frameworks in Ireland adequately capture ICT-facilitated recruitment and grooming for trafficking purposes. Concerns also arise in relation to the need for new legislation and adequate enforcement of existing legislation including in relation to recommender algorithms and age-appropriate content.⁴⁸⁰

How are children targeted online?

Examples of how children may be targeted and recruited include in the course of their use of social media, and through messaging apps, gaming platforms and AI-driven tools. Recruitment often begins through grooming, which can now be done online. ICT has altered this process significantly, enabling grooming to become faster, more scalable and can escalate quickly.

Social media and online gaming platforms were identified as key environments for recruitment, with younger children particularly at risk through interactive gaming environments. Research suggests that children are frequently contacted by unknown individuals through online games and social media platforms, with some forms of exploitation beginning, and occurring, within these digital environments.⁴⁸¹

Forms of ICT-facilitated exploitation

ICT is used across multiple forms of trafficking, including sexual exploitation, criminal exploitation and labour exploitation but can also be used to facilitate the grooming of children for any form of exploitation. International data and stakeholder experience indicates that ICT-facilitated trafficking is particularly associated with child sexual

⁴⁷⁹ [ibid](#), Arts 5 & 6.

⁴⁸⁰ See for example: Department of Health (2025), [Online Health Taskforce Final Report, Online Health and Rights for Ireland's Children and Young People](#), p25. Also Irish Council for Civil Liberties (2024), [Tech companies will not save our kids: ICCL speaks at Oireachtas Children's Committee](#) and Children's Rights Alliance (2025), [Online Safety Monitor 2025](#).

⁴⁸¹ See for example: CyberSafeKids (2025), ['A Life Behind The Screens: Uncovering the Realities of a Digital Childhood', Trend and Usage Report Academic Year 2024-2025](#), Organization for Cooperation and Security in Europe (2024), [New Frontiers: The Use of Generative Artificial Intelligence to Facilitate Trafficking In Persons, Policy Brief, November 2024](#).

exploitation and child criminal exploitation, including recruitment into drug distribution networks.⁴⁸²

Why are children particularly vulnerable?

Children are particularly vulnerable due to unsupervised internet use, limited awareness of risks and their age. The OSCE highlights that children's engagement with online platforms significantly increases exposure to traffickers.⁴⁸³

A key concern is low awareness among children and parents of online risks.⁴⁸⁴ Many children have limited awareness of trafficking, grooming and exploitation, and often do not recognise the risks or indicators of online exploitation. This lack of awareness can extend to parents and guardians, further limiting opportunities for early intervention and prevention.

Challenges in identification

ICT-facilitated trafficking presents significant challenges to identification because:

- exploitation occurs in private digital environments;
- children may not be aware that they are being groomed and exploited;
- children may not disclose abuse to parents, adults or law enforcement; and
- evidence may be difficult to access.

Investigation and prosecution challenges

ICT-facilitated trafficking introduces complex investigative challenges, including cross-border evidence and digital forensics. The European Commission has emphasised the

⁴⁸² See for example: Irish Human Rights and Equality Commission (2024), [Trafficking in Human Beings in Ireland Third Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p288 referencing UK County Lines phenomenon and Irish Human Rights and Equality Commission (2023) [Trafficking in Human Beings in Ireland: Second Evaluation of the Implementation of the EU Anti-Trafficking Directive](#), p201-242, Organization for Security and Co-operation in Europe (2020), [Leveraging Innovation to Fight Trafficking in Human Beings: A Comprehensive Analysis of Technology Tools](#) and RTÉ News, 27 November 2025, [Senior cyber crime garda warns of 'alarming' scale of child grooming within games](#).

⁴⁸³ Organization for Cooperation and Security in Europe (2024), [New Frontiers: The Use of Generative Artificial Intelligence to Facilitate Trafficking In Persons, Policy Brief, November 2024](#), p6.

⁴⁸⁴ See for example: CyberSafeKids (2025), [Left to their own devices: The virtually unprotected lives of kids in Ireland](#), Organization for Cooperation and Security in Europe (2024), [New Frontiers: The Use of Generative Artificial Intelligence to Facilitate Trafficking In Persons, Policy Brief, November 2024](#).

need for specialised ICT training.⁴⁸⁵ Such training would improve capacity across law enforcement and the judiciary and should involve integrating cybercrime expertise into human trafficking investigations.

Prevention and awareness

The European Commission emphasises digital literacy as key to prevention.⁴⁸⁶

Increasing awareness among children themselves is critical to vulnerability reduction, particularly in the context of ICT-facilitated grooming and recruitment. Education should focus on recognising grooming, understanding risks and developing critical thinking skills.

International good practice, such as the Finnish model which focuses on developing ICT competence and online media safety skills in children from a very young age,⁴⁸⁷ has been praised for embedding these skills in education systems. Independent research has highlighted how 72% of Finnish children reported that they would be able to identify an offender trying to groom them online.⁴⁸⁸

The role of technology and emerging risks

The increasing use of generative AI represents a significant escalation in risk, enabling traffickers to create realistic identities, automate aspects of grooming and engage with children at scale.

CyberSafeKids highlights how increasing numbers of young children are now engaging with AI chatbots.⁴⁸⁹ The OSCE has highlighted that technological developments,

⁴⁸⁵ Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Art18(b).

⁴⁸⁶ Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, Art18(2).

⁴⁸⁷ Finnish National Agency for Education, [National Core Curriculum Primary and Lower Secondary Basic Education](#). Online media safety was extended to pre-school children in 2020 Finnish Arts and Culture Agency, [New Literacies Development Programme](#).

⁴⁸⁸ Council of Europe & ECPAT International (2023) [Country Overview Finland - Ending Child Sexual Abuse and Exploitation: State of Play in light of the Lanzarote Convention](#), p11.

⁴⁸⁹ CyberSafeKids (2025), [‘A Life Behind The Screens: Uncovering the Realities of a Digital Childhood’](#), [Trend and Usage Report Academic Year 2024-2025](#), p28

particularly AI, enable traffickers to create realistic false identities, overcome cultural and other barriers, and operate with greater sophistication and reach.⁴⁹⁰

The role of the private sector

Technology companies play a central role in the fight against ICT-facilitated grooming and exploitation. Concerns surrounding ICT-facilitated grooming of children include platform design, recommender algorithms and insufficient regulation.

Key challenges

- rapid evolution of technology and AI;
- limited regulation of digital platforms;
- gaps in education, training and awareness, particularly among children and parents;
- difficulties in identifying victims;
- cross-border nature of offences causing difficulties for law enforcement; and
- lack of data, research and knowledge in relation to ICT-facilitated grooming, recruitment and exploitation.

The limited availability of data on ICT-facilitated child trafficking constrains evidence-based policy responses and the ability to assess the scale and nature of the issue.

Key priorities

- strengthen digital literacy and education;
- expand training for frontline professionals;
- build specialised ICT investigative and prosecutorial capacity;
- enhance regulation and accountability of technology companies;
- improve identification of victims, including those exploited online;
- strengthen international cooperation; and

⁴⁹⁰ Organization for Cooperation and Security in Europe (2024), [New Frontiers: The Use of Generative Artificial Intelligence to Facilitate Trafficking In Persons, Policy Brief, November 2024](#), p17.

- improve data collection and research

Conclusion

ICT-facilitated child trafficking represents a significant and rapidly evolving challenge. Digital technologies have transformed how trafficking occurs, increasing the scale, speed and reach of exploitation, often without the need for physical contact. There have been delays in recognising and understanding the impact of ICT and there are growing concerns regarding increasingly sophisticated methods of exploitation, including the use of AI. At the same time, data on ICT-facilitated trafficking remains limited, constraining effective policy responses.

ICT-facilitated trafficking is closely linked to prevalent forms of exploitation in Ireland, particularly sexual exploitation and criminal exploitation, and may contribute to the under-identification of child victims, including Irish children.

Strengthening the response will require a more coordinated and forward-looking approach, including improved digital literacy, enhanced investigative capacity, stronger regulation of online platforms, and better data collection. A child-centred and digitally informed response will be essential to effectively prevent and address ICT-facilitated child trafficking.



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