

Review of the Operation of Part 4 of the Criminal  
Law (Sexual Offences) Act 2017:

Submission of the Immigrant Council of Ireland

10 September 2020

Working for **equality**



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## **REVIEW OF THE OPERATION OF PART 4 OF THE CRIMINAL LAW (SEXUAL OFFENCES) ACT 2017:**

### **SUBMISSION OF THE IMMIGRANT COUNCIL OF IRELAND**

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The Immigrant Council of Ireland is delighted to contribute to the public consultation accompanying the Review of the Operation of Part 4 of the Criminal Law (Sexual Offences) Act 2017. In line with the organisation's priorities, practice and area of competence, it has been an active participant in previous consultations processes on the matter of prostitution, as well as sex trafficking in Ireland.

#### **BACKGROUND INFORMATION**

The Immigrant Council of Ireland is an Independent Law Centre and NGO that works to protect, support and advocate for the rights of migrants and their families. The law centre provides legal information, advice and representation through an information service and two full-time solicitors. The Immigrant Council teams lead projects and policy work to advocate in a variety of local, national and international arenas to ensure the voices of migrants are represented.

The Immigrant Council is also a leading national anti-trafficking organisation with expertise in policy and advocating for legislative change, in particular prevention of the crime through reduction of demand for prostitution. The Immigrant Council Independent Law Centre offers anonymous and confidential legal advice to migrant people (women and transgender women) involved in prostitution. The law centre specialises in holistic legal aid to trafficked migrant women recovering from sexual exploitation. The majority of victims of trafficking whom the Immigrant Council represents are housed in direct provision centres.

#### **ABOUT OUR SUBMISSION**

The Immigrant Council of Ireland endorses the recommendations of the Interim Report<sup>1</sup> of the High Level Working Group on the Implementation of the Criminal Law (Sexual Offences) Act 2017 (referred hereafter as the Implementation Report only). The organisation was an active participant and co-convenor (with the Sexual Exploitation Research Project, University College Dublin) of this working group, chaired by Dr Geoffrey Shannon, a Special Rapporteur on Child Protection for the Irish government from 2006 to July 2019 that united the expertise and practical observations of leading statutory and civil society organisations<sup>2</sup>. In addition to the link provided below, the full Implementation Report of this group will be submitted to this review separately.

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<sup>1</sup> Interim Report (2020) of the High Level Working Group on the Implementation of the Criminal Law (Sexual Offences) Act 2017, available at:

<https://www.immigrantcouncil.ie/sites/default/files/2020-01/2020HLWGInterimReportSOA2017ByGeoffreyShannon.pdf>

<sup>2</sup> The High Level Working Group committee comprises An Garda Síochána; Health Service Executive, SERP (Sexual Exploitation Research Programme, UCD), the Department of Justice and Equality (as observers), Ruhama, Men's Development Network, Survivor activist – Mia De Faoite, the Immigrant Council of Ireland, the Dublin Rape Crisis Centre, Doras Luimní, the Children's Rights Alliance and Dr Geoffrey Shannon as Chair.

Furthermore, we complement the above recommendations with some current observations addressing the concrete issues outlined in the consultation announcement document published by the Department of Justice and Equality on the occasion of this public consultation.

The submission is informed by our work with migrants and will take into account the overwhelming representation of migrant women in the sex trade in Ireland. The submission is made from a migrant and feminist perspective, which is a standard in the Immigrant Council of Ireland's work.

## **SUBMISSION POINTS**

The submission is structured along the consultation themes suggested in the official consultation announcement.

In response to:

Legislation that aims to protect those offering sexual services and that criminalises the purchase of sexual services • Relevant social changes regarding the offering and purchase of sexual services • The impact of such policy interventions and social changes

The law under review is novel in that it treats the 'seller' and 'buyer' in the prostitution transaction in a different way for the first time in the history of the Irish legislation. This is a welcome innovation that addresses the inherent power imbalance that exists in the prostitution transaction between two parties, in terms of social standing and monetary choice on the one hand, and in terms of the wider patriarchal and gender-unequal society that disadvantages women on the other.

The novelty of the law has also a second important dimension, pertaining to the fact that the sellers, in the last decades, are overwhelmingly migrant women, while the buyers remain overwhelmingly local men<sup>3</sup>. The Immigrant Council notes the observations of recent research submitted as part of this review by the Sexual Exploitation Research Project (SERP) of University College Dublin<sup>4</sup>. This research highlights once again the predominance of migrant women in the sex trade in Ireland, stating that the majority of the approximately 650 women being advertised for sale every day in Ireland are migrant women. The findings of SERP in their analysis of 144 case files of the Women's Health Project of the Health Service Executive state that indicators of coercive control and human trafficking exist within this cohort of migrant women. These findings echo the experience of the legal team of the Immigrant Council of Ireland, which provides legal support to victims of human trafficking exploited in the sex trade. As will be noted elsewhere in this submission, the

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<sup>3</sup> Kelleher, P. et al., (2009), *Globalisation Sex trafficking and Prostitution: The Experiences of Migrant Women in Ireland*. Dublin: Immigrant Council of Ireland.

Yonkova, N. and Keegan, E. (2014) *Stop Traffick: Tackling Demand for Sexual Services for Trafficked Women and Girls*, EC (ISEC) Dublin: Immigrant Council of Ireland.

<sup>4</sup> O'Connor, M., and Breslin, R., (2020, forthcoming), *Shifting the burden of criminality: An analysis of the Irish sex trade in the context of prostitution law reform*. Dublin: The Sexual Exploitation Research Programme, UCD.

necessity of immigration supports as part of a comprehensive exit strategy model in relation to migrant women in the sex trade is a crucial aspect of the future successful implementation of this aspect of the law. Exit strategies of this nature must be developed incorporating the recognition of the specific immigration, housing, English language support and social supports required by women from a migrant background.

The law is timely and useful because it responds to and offsets the multiple inequalities underpinning prostitution, such as female/male gender, economic and social standing, ethnicity and immigration/citizenship rights. It simultaneously removes the blame from the vulnerable and disenfranchised party – the ‘seller’ who is most often a migrant woman, and holds to account the empowered and choice-imbued party – the ‘buyer’ who is most often a male citizen of the State with education and social standing.

In the process of pursuing this dual strategy, the law fulfils a wider range of transformations. In the first place it disrupts the sex trade as a proven environment fostering trafficking for the purposes of sexual exploitation, which is a recommended approach by virtually all anti-trafficking treaties and takes into account the organised criminal nature of contemporary prostitution<sup>5</sup>. Secondly, it sends an important message of ‘siding with’ and thus empowering members of one of the, historically, most vulnerable cohorts of women. Thirdly, it contributes to building new values in society that are much more in line with the State’s high regard to equality in general and equality between men and women in particular, and with intolerance to the objectification of humans and of women’s bodies as moral relics of slavery and patriarchy.

In response to:

How the Act has been enforced • The impact of such enforcement on those offering those services and on the purchaser of those services

Regarding any comments on the enforcement of the law, it is of note that while the adoption dates from 2017, the actual implementation of the law commenced only in 2019. Therefore, any conclusive observations at this stage appear premature.

Nonetheless, significant steps have been undertaken by An Garda Síochána in the last couple of years to develop implementation approaches and to achieve practical application of the law, which is impressive given the uniquely novel intervention into a clandestine transaction between individuals within an environment controlled by criminal organisers. Section 2 of the Implementation Report (page 10 and 11) provides important numerical information in relation to the short period of law enforcement to date.

Similarly, the Immigrant Council echoes the initial findings of the SERP research<sup>6</sup> submitted as part of this review, which notes that, while the Garda National Protective Services Bureau has demonstrated a considerable emphasis on the decriminalisation of the seller and the criminalisation of the buyer in the initial stages of the implementation of the law, trust

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<sup>5</sup> RTE Prime Time “Profiting from Prostitution (2012), available at: <https://www.rte.ie/news/player/prime-time-web/2012/0207/>; RTE Prime time “Sex for Sale”, available at: <https://www.rte.ie/news/player/2015/1130/10499497-rte-investigates-sex-for-sale/>

<sup>6</sup> Ibid.

between marginalised migrant women in the sex trade and policing remains a significant area for improvement. In the case of migrant women in the sex trade, this lack of trust can often be based on fears the women in question hold concerning the immigration implications of their coming to the attention of the authorities, even in the circumstances of their decriminalisation, and their negative experiences of policing in other countries. This reiterates the observation of the Immigrant Council that comprehensive exit strategies, which have clear and transparent immigration procedures which recognise the often extreme and specific vulnerability of the women in question, are a core requirement for the future.

It would appear that the issue of building trust among vulnerable sellers of sex has emerged in the context of policing of brothel keeping in the implementation period. There is at least some anecdotal evidence that women selling sex have been unnecessarily harshly targeted by the Gardaí for brothel keeping offences, where the act of profiting from the prostitution of others has been disputed<sup>7</sup>. While the law prohibiting criminal organisations and brothels as essential operations of the sex industry remains very important for the implementation of the law under review, the unnecessary penalisation of vulnerable sellers of sexual services could undermine the overall approach. In this regard, sensitivity training for Gardaí and prosecutorial guidelines as to what represents the public interest in relation to penalising vulnerable persons selling sexual services where no clear evidence exists regarding profiting from the prostitution of others, could eliminate such instances of mistrust and support the spirit of the law under review. The precedent that exists regarding the non-penalisation of victims of trafficking in human beings by the DPP represents a suitable example to consider.

In response to:

**Any other public policy interventions associated with the offering and purchase of sexual services**

The offering and the purchase of sexual services represents the central transaction on which the prostitution system is based. The more extreme cases of control and exploitation within prostitution often amount to trafficking for the purposes of sexual exploitation, which is recognised as a form of gender-based violence (Istanbul Convention 2011, Directive 2012/29/EU). Therefore, any policy interventions associated with the offering and purchase of sexual services practically belong in the domain of gender-based violence, involving trafficking for sexual exploitation and prostitution.

By taking a stance on the issue of offering and selling of sexual services through adopting the law in question, the Irish legislators have firmly positioned prostitution as a form of gender-based violence and violence against women. This is a unique progressive position taken by an increasing number of countries that have taken a similar gender-specific approach to prostitution, in Europe and beyond.

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<sup>7</sup>Lynott, L., (2019) Disgust as jail sentences are handed to sex workers, one of them pregnant, Irish Independent June 10

Given the above considerations, the national strategy on gender-based violence has to overarch any policy interventions regarding prostitution and human trafficking for sexual exploitation, as forms of gender-based violence. Presently this is not the case and thus policy interventions regarding various offences primarily affecting migrant women through violence of a sexual nature remain insufficiently aligned and coordinated<sup>8</sup> in order to assist the implementation of the law under review.

In response to:

**Any perceived barriers to the protection of those offering sexual services and the criminalisation of the purchase of sexual services**

Barriers to the implementation of the section emerge in relation to several aspects regarding protection of those offering sexual services, and respectively, criminalisation of those purchasing such services.

As outlined above, the lack of sufficient resources and strategies dedicated to exit strategies for people selling sex impacts on their willingness to move on from prostitution and therefore poses a barrier to their successful protection. Secondly, the migrant background and the lack of rights to access State funded supports represents an additional barrier for protection of those selling sex. Therefore, all policies and adjustments undertaken with a view to increase (or create) such access have to take into account the immigration/citizenship rights of the intended beneficiaries.

The ongoing online advertising of prostitution, contravening the intended provisions of the Criminal Justice (Public Order) Act of 1994<sup>9</sup>, fuels the sale and purchase of sex. The lack of any attention to this contradictory situation creates a barrier to the implementation of the law in question by requiring significant resources to police multiple locations of sale and purchase of sex. Similarly, this impacts and puts pressure on the resources necessary to respond to the vulnerabilities and the protection needs of persons selling sex.

The proliferation of adult pornography has proven links to fostering intentions among those who purchase sex. In particular, the easily available online adult pornography generates demand for paid sex, which burdens the policing resources needed to implement the law in question. Dangerous and harmful in itself, adult pornography contributes to the multiplication of the sex trade and increases the level of resources needed for protection of vulnerable sellers of sex, if it remains unaddressed.

Additionally, a limited number of entities and groups that advocate for a fully legalised/fully decriminalised approach to prostitution in Ireland dedicate significant resources to contravene the intentions of the State captured by this law, through increasing

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<sup>8</sup> Yonkova, N. (2020) Violence Against Migrant Women: joint submission to the Citizens' Assembly by AkidWa, Immigrant Council of Ireland, Nasc, Reform-Stamp-3, Ruhama and Sexual Violence Centre Cork. Available at: <https://www.citizensassembly.ie/en/what-we-do/public-consultation/submissions%20received/joint-submission-to-citizens-assembly-on-violence-against-migrant-women-ca30255.pdf>

<sup>9</sup> Criminal justice (Public Order) Act of 1994, Section 23. Available at: <http://www.irishstatutebook.ie/eli/1994/act/2/section/23/enacted/en/html>

public and media campaigning. There is a danger that resources directed towards advocating for this alternative model (as adopted in countries such as Germany and New Zealand and which has been found to create an exponential increase in the sex trade and human trafficking situations in those countries<sup>10</sup>) could outweigh what investments the State may allocate to implement and review the law in question, thus undermining the protection of those in situations of prostitution and the criminalisation of the buyers of sex. Further investment by the Irish government to embed the desired normative change which rightly identifies prostitution and trafficking for the purpose of sexual exploitation as forms of violence against women (in accordance with the spirit of the law) is thus essential.

Finally, the current absence of any supporting immigration provisions taking into account the migrant background of the majority of persons selling sex and the approach to policing of brothel keeping mentioned elsewhere in this submission represent potential barriers to protection.

In response to:

**How the safety and well-being of persons who engage in sexual activity for payment may be impacted by criminalising the purchase of sexual services**

The law aims at undermining the system of prostitution as an exploitative, violent and outdated practice, which nonetheless represents a current area of economic activity and income generation for people selling sex. Regardless of the very high personal price they pay for it, the law potentially limits the economic survival strategy of such people, provided no alternative means and supports in the form of comprehensive exit strategies are put in place by the State.

Therefore, the absence of any State measures to create alternative economic means and progression for those seeking to exit prostitution impacts negatively on their wellbeing and safety. It must be noted that this negative impact in no way occurs as a result of the legislation, but in fact predates it as an issue long in need of addressing. Additionally, given the prevalence of women from a migrant background in prostitution in Ireland, the incorporation of clear and rights-based pathways to legal immigration status as part of an exit strategy model would significantly positively impact the wellbeing and possible life choices of many of the women impacted. It is the position of the Immigrant Council that such pathways should and must be devised, given the extreme vulnerability of many women in these circumstances.

The law increases the safety of the 'seller' in that it decriminalises their activities and sends important messages of assurance regarding the position of the State on the matter of their often controlled and precarious situation. The damaging existence of violence perpetrated against the seller in the sex trade has been long documented as an inherent and corrosive

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<sup>10</sup> Walby, S. (2016) Study on the Gender Dimension of Trafficking in Human Beings, EC: Brussels; O'Connor, M. (2019), The Sex Economy, Agenda Publishing

factor of the operation of prostitution<sup>11</sup>. In the particular case of women who are victims of human trafficking, violence and threats of violence are pervasive methods used by both criminal elements and buyers to achieve total control and domination over the women in question, often to the extent where threats of violence are made against the women's children and extended family. We note the findings of the SERP research<sup>12</sup> submitted as part of this review which analyses the existence of violent incidents in the sex trade in the current Irish context. The Immigrant Council of Ireland echoes the conclusion of the SERP findings in relation to there being no convincing evidence that this Act has led to altered level of violence against women in the sex trade. In relation to the victims of human trafficking provided with legal support by the Immigrant Council of Ireland legal team, none have reported or voiced the opinion that the law under review has increased or altered the level of violence they have experienced. Rather, the seeking of support and help by the women in question could now be better exercised due to their decriminalised status in relation to soliciting (selling of sex). However, it must be stated that the experience of the Immigrant Council is that there is a low level of knowledge on the existence and implications of the law among our relevant client base, which may be as a result of their marginalisation and often low levels of English language proficiency. Awareness raising of the law and its implications among women in the sex trade, and in particular among exceptionally marginalised women with low levels of English language proficiency, must form an important future focus of the activities of the State and of relevant civil society organisations in relation to the ongoing implementation of this law.

In response to:

**Any perceived unintended risks to vulnerable people e.g. victims of human trafficking and others arising from the operation of the Act.**

While not an implication of the law per se, details have recently emerged regarding the Gardaí's informal policy on immigration status when investigating crime. According to a study by Insp. David McInerney, An Garda Síochána has a policy not to investigate the immigration status of people who may have entered the country undocumented or later became undocumented if that individual is a victim of or a witness to a crime. This has long been classed as an "unwritten rule" in the force. However, this policy only stands while the inquiry is ongoing. Once a case has been closed, any suspected undocumented immigrants who have been a victim of the crime in question or who have assisted the Gardaí may be referred to the Garda National Immigration Bureau for investigation.

While the Immigrant Council is not aware of any situation where a victim of crime has faced immigration implications following their engagement with Gardaí, the perception by a potential migrant victim of crime of this being a possible outcome has obvious implications for the implementation of the Equality Model in Ireland. In such a scenario, victims of sex trafficking who are undocumented migrants may assume that reporting their circumstances to the Gardaí will have negative immigration implications, regardless of whether or not that

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<sup>11</sup> Kelleher, P. et al., (2009), Globalisation Sex trafficking and Prostitution: The Experiences of Migrant Women in Ireland. Dublin: Immigrant Council of Ireland; Yonkova, N. and Keegan, E. (2014) Stop Traffick: Tackling.

<sup>12</sup> Ibid.

will be the case. There is evidence that the threat of deportation is used by pimps to drive a wedge between the women they control and the Gardaí, as part of the overall fear towards authorities such criminals foster as a control strategy. The ambiguity surrounding this policy approach may unintentionally compound such fears in addition to disincentivising undocumented victims of exploitation from coming forward and trapping them within a shadow economy from which they cannot escape.

The intention of the Act is not just to deter men from buying sex via criminalisation, it also seeks to create a framework that makes it easier for women to exit and avoid prostitution. In the interim report on Part IV of the Criminal Law (Sexual Offences Act) 2017 by the Higher Level Working Group<sup>13</sup>, Dr Geoffrey Shannon notes the specific challenges relating to immigrant women in prostitution in Ireland. According to the report, 87-97% of women in prostitution in Ireland are migrant women. While not all of these women are in the country without a valid immigration status, a portion undoubtedly are. Dr Shannon advocates for “legal representation from specialised lawyers [to ensure] that women obtain consistent information regarding their rights, including the right to remain in the state.” He also recommends that “training should continue to focus on encouraging the Gardaí to understand the vulnerabilities of those who have been drawn into prostitution, what might make women reticent to speak to the Gardaí, how to overcome these barriers and support women better.” These are helpful policy recommendations, but the fact remains that if undocumented migrant women in prostitution have a perception that they are at risk of being investigated by the Garda National Immigration Bureau, a significant barrier will remain to tracking down traffickers and to helping women exit prostitution.

The Immigrant Council of Ireland calls for greater clarity from the Gardaí in relation to the non-investigation of the immigration status of victims of crime, and advocates that a formal policy be communicated publically, as well as internally within the force, that allows all undocumented migrant victims of crime to co-operate with the Gardaí without fear of negative immigration implications, including following the conclusion of any investigation.

## **SUMMARY CONCLUSIONS**

The Immigrant Council of Ireland endorses the recommendations of the Interim Report of the High Level Working Group on the Implementation of the Criminal Law (Sexual Offences) Act 2017<sup>14</sup> and the findings of the SERP/UCD report *Shifting the burden of criminality: An analysis of the Irish sex trade in the context of prostitution law reform*.<sup>15</sup>

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<sup>13</sup> Interim Report (2020) of the High Level Working Group on the Implementation of the Criminal Law (Sexual Offences) Act 2017 , available at:

<https://www.immigrantcouncil.ie/sites/default/files/2020-01/2020HLWGInterimReportSOA2017ByGeoffreyShannon.pdf>

<sup>14</sup> Interim Report (2020) of the High Level Working Group on the Implementation of the Criminal Law (Sexual Offences) Act 2017 , available at:

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<sup>15</sup> O'Connor, M., and Breslin, R., (2020, forthcoming), *Shifting the burden of criminality: An analysis of the Irish sex trade in the context of prostitution law reform*. Dublin: The Sexual Exploitation Research Programme, UCD

## **SOCIETAL VALUE OF THE LAW**

The law under review represents a timely, progressive and necessary approach to prostitution that underpins equality between women and men, responds to pertinent economic and social imbalances and contributes to the reduction of extreme and lasting harm and violence against vulnerable people, primarily women.

The law positions the State as one recognising prostitution and trafficking for sexual exploitation as a form of violence against women, which is in line with the direction taken in modern international and regional treaties such as the Istanbul Convention and the Victim's Right Directive (2012/29/EU).

The law increases the safety of the seller of sexual services in that it decriminalises their activities and sends important messages of assurance regarding the victim-centred position of the State.

## **GENDER DIMENSION OF THE LAW**

The law is gender-specific and therefore completely adequate in that it directly addresses the gender-specific phenomenon of prostitution, where, in the vast majority of instances, women sell and men buy sex.

The national strategy on gender-based violence in Ireland must align and coordinate the policy responses regarding prostitution and human trafficking for sexual exploitation within the wider family of various gender-based violence manifestations against women, including migrant women.

## **EXIT PROGRAMMES, IMMIGRATION STATUS AND TRAFFICKING**

Continuous and successful implementation requires sufficient resources for exit strategies for people selling sex, in order to provide a supportive environment where alternatives exist to facilitate their moving on from prostitution. There is ample evidence that a very high proportion of women selling sexual services strongly prefer to exit the trade.

Given the overwhelming representation of migrant women in prostitution, immigration supports as part of a comprehensive exit strategy model in relation to migrant women in the sex trade is a crucial aspect of the future successful implementation of this aspect of the law.

There is a need to develop further and formalise the unwritten policy not to investigate the immigration status of undocumented individuals who are victims of or witnesses to a crime, in light of the fact that sellers of sexual services are witnesses of crime (the purchase of sex) and are in many cases victims of extreme sexual violence. This approach directly undermines the traffickers' strategies of instilling fear of the authorities in victims of trafficking for sexual exploitation whom they seek to control.

## **POLICING THE LAW**

Significant steps have been undertaken by An Garda Síochána to develop implementation approaches and to achieve practical application of the law, which are impressive given the

uniquely novel intervention into a clandestine transaction between individuals within an environment controlled by criminal organisers. Further resourcing and prioritising this work could ensure continuously improved implementation.

Building trust with vulnerable individuals selling sex, formalising and communicating approaches for this and embedding victim centred practices with systematic and regular training of frontline Gardaí, are crucial elements to the further implementation of the law by An Garda Síochána.

The avoidance of unnecessary penalisation of vulnerable sellers of sex in the context of brothel keeping should be ensured through guidelines for Gardaí and public prosecutors. The non-penalisation approach existing for victims of human trafficking represents a relevant example in this regard.

### **POLICY ASPECTS SUPPORTING THE LAW**

There is a need to develop a plan to address the online advertising of the sale/purchase of sex in Ireland, which contravenes the spirit of existing legislation.

There is a need to address the proliferation of adult online pornography and to continue efforts to dismantle online child pornography as institutions fuelling prostitution, sexual violence and exploitation of women, girls and boys.

### **PERSISTENT AWARENESS WORK**

Further investment by the Irish government to embed the desired normative change which rightly identifies prostitution and trafficking for the purpose of sexual exploitation as forms of violence against women (in accordance with the spirit of the law) remains essential for further implementation.

Awareness raising of the law and its implications among women in the sex trade, and in particular among exceptionally marginalised women with low levels of English language proficiency, must form an important future focus of the activities of the State and relevant civil society organisations in relation to the ongoing implementation of this law.

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