

Room for Recovery

Housing Hope After Exploitation



Comparing Models of
Accommodation for Victims
of Human Trafficking for
Sexual Exploitation



Ruhamma
Fighting Sexual Exploitation, Prostitution and Human Trafficking

Ruhama would like to acknowledge the support of the Department of Justice, Home Affairs and Migration, which funded this research.



The full report is available at www.ruhama.ie
Scan this QR code to access the full report.

This research was commissioned by Ruhama and undertaken by a team of independent consultant researchers specialising in qualitative research using participatory methods. The lead researcher, Helen Bartlett, has worked for over 25 years with survivors of forced migration and sexual violence on three continents. She has a background in human rights law, gender-based violence, marginalisation and migration, and works across sectors to support evidence-based legislative reform.

About the study

Human rights law situates human trafficking for sexual exploitation as a manifestation of gender-based violence. All measures to protect victims must promote gender equality and use gender-mainstreaming tools in their development, implementation and impact assessment. Gender equality measures are key to both the prevention of human trafficking for sexual exploitation and the protection of victims and survivors.

Accommodation is an essential part of the set of assistance measures for victims of trafficking. Recovery is impossible without access to safe accommodation that will discontinue the victim's exposure to traffickers and risk of exploitation. Gender-specificity is a crucial feature for accommodation of victims of trafficking who are recovering from sexual and other gender-based violence.

This report was commissioned by Ruhama, in recognition of the fact that accommodation for victims of trafficking for sexual exploitation in Ireland is deficient. The current National Action Plan to Prevent and Combat Human Trafficking 2023–2027 (NAP) (page 19) states:

It is recognised that the current provision of accommodation may not be suitable for the complex needs that victims of trafficking have.

The overall aim of the research is to provide an analysis of the relevant legal framework and an international comparative analysis of other models of accommodation for victims of human trafficking for sexual exploitation. The analysis is enriched through extensive consultations with



practitioners in the area and survivors of human trafficking recovering in Ireland. Ultimately, the research seeks to inform the overall development of a model of specialist accommodation for victims of trafficking for sexual exploitation in Ireland.

The report explores four critical questions to inform the development of a new model.

- What does regional and EU human rights law say about the provision of accommodation for victims of human trafficking for sexual exploitation?
- What models of accommodation have other European countries implemented and what are the key strengths and challenges related to these models?
- What do women with lived experience of human trafficking for sexual exploitation and the current model of accommodation say about developing a new model?
- What do other key stakeholders in statutory and civil society services and organisations say about developing a new model of accommodation?

To achieve this exploration, the report undertakes a review of binding legal standards in regional and EU law for the accommodation of victims. The strengths and challenges of seven national models are presented, offering insights into good practices and suitable approaches for consideration or adaptation to Ireland's needs. The perspective of survivors and the frontline workers who support them strengthens the legislative and best practice evidence base.

More specifically, the research examines and compares the Irish model of accommodation for victims of human trafficking for sexual exploitation with the national model in Belgium, France, Germany, the Netherlands, Northern Ireland, Scotland and Sweden. All of the studied countries are at different stages of compliance with regional and EU obligations. Seven distinct approaches and case studies of best practice that could have relevance for Ireland are identified.

Direct consultation on the subject of accommodation with victims of trafficking for sexual exploitation highlights the profound impact of unsafe and inappropriate accommodation on individual recovery. In particular, research participants stressed that privacy within accommodation is fundamental for the victim's dignity, confidentiality and recovery. Unsafe or inappropriate accommodation negatively impacts victims' ability to trust, share accommodation and build social networks. Specialist supports are also identified by participants as vital for the recovery journey and must be easily available for all victims across all accommodation types. The importance of a predictable and safe model of continuous accommodation that supports individual recovery needs of victims is emphasised.

The report offers a framework for improving practices based on human rights law and trauma-informed, victim-centred practices, as identified by direct consultation and comparative analysis. It is intended that the report serves as a resource for understanding the complexities of accommodating victims of trafficking for sexual exploitation and for designing an improved model of services. The research aims to guide policymakers, practitioners and advocates working to develop a new model of accommodation for adult victims of trafficking and their children.

Key findings

The report shows the need for greater clarity and commitment towards provision of accommodation in national law and policy. Failure to be specific on the matter of accommodation led to serious and well-recognised shortcomings in the past. The State has agreed to the latest EU standards by opting into the revised EU Directive 2024/1712, and these standards must be enshrined clearly in our policy documents, if not in primary legislation.

The report also reveals the need to secure access to accommodation for all victims, without conditions linked to the victim's origin, nationality, statelessness, immigration status or pending international protection claim. Existing conditionality leads to complications in accessing services and lets many victims down, which carries enormous personal risks for the individual and reputational risks for the State.

The findings flag the Operational Guidelines of the National Referral Mechanism for Identification and Assistance (NRM) as a key and timely opportunity to deliver on the provision of gender-specific forms of specialist accommodation for victims of trafficking. The right to specialist accommodation, independent of the victim's origin, nationality, statelessness, immigration status or pending international protection claim, is not yet embedded in legislation or explicitly clarified in policy.

The report notes the need for local authority housing allocation policies to be examined for any anomalies or barriers that preclude victims from accessing specialised or local authority housing accommodation. Given the significant problems captured in the report, Ruhama recommends the temporary appointment of a Special Rapporteur on Victim Accommodation to monitor the access to appropriate accommodation for each victim in the NRM.

The report highlights the important synergies between the NAP on trafficking and the Third National Strategy for Domestic, Sexual and Gender-Based Violence (DSGBV). These include the establishment of a system for meaningful consultation with, and feedback from, victims of trafficking for sexual exploitation, and the inclusion of provision for victims of trafficking impacted by sexual exploitation and other forms of gender-based violence in the development of the DSGBV National Services and Accommodation Development Plan.

The research shows the importance of designated case workers and specialised Civil Society Organisation (CSO)-led coordination. Best practice indicates that a frontline specialist



CSO must take on responsibility for individual pathways of accommodation for all presumed and identified victims of trafficking (including their children), coordinated across all forms of specialist and non-specialist accommodation and based on individual risk and needs assessment. This model significantly increases potential for improved networking between accommodation providers and expertise sharing.

The research findings indicate that the potential of local authorities is not fully utilised in Ireland compared to other countries. The involvement of local authorities in the studied countries is an essential element in meeting obligations to provide safe and appropriate accommodation to victims, including but not limited to designating local authority anti-trafficking coordinators. This measure supports the achievement of seamless pathways to independent living, ensuring that needs for continuous and longer-term housing are met without fear of homelessness or precarity.

The importance of regular and adequate training is also flagged in the report. Providers of services and accommodation to groups of people who are at high risk of trafficking for sexual exploitation are required to offer regular training and should develop specific policies for early detection and referral of potential victims into the NRM.

The establishment of a pilot accommodation unit for victims of trafficking represents progress towards the development of a compliant model of accommodation. The pilot needs to be evaluated at the earliest opportunity to establish outcomes and positive practices and to identify possible areas of improvement. In this regard, the report directs attention to building upon the extensive expertise and experience of the DSGBV sector in the development of gender-specific and victim-centred accommodation in sufficient capacity to meet the need for crisis, interim and follow-on accommodation.



Summary of national models

Brief summary of Irish model

	Responsibility	Model
Ireland	Centralised State-agency tenders for and contracts accommodation for the purposes of international protection, on a commercial and non-commercial basis.	In the absence of specialist supported accommodation for Victims of Human Trafficking for Sexual Exploitation a State-funded centralised (asylum reception) system is utilised for all for international protection applicants including victims of trafficking. A State agency contracts mainly commercial accommodation providers to provide asylum reception accommodation. In late 2023 the same State agency also contracted a CSO to provide a specialised pilot accommodation unit for eight female victims of human trafficking through IPAS.

Brief summary of national models

	Responsibility	Model
Belgium	Local authority-funded CSOs provide specialised shelters.	Local authority-funded CSOs provide purpose-built accommodation for victims of trafficking and individual holistic plans aimed at social and financial recovery and reintegration into society. Accommodation provision includes specialised residential centres, supervised apartments and independent social housing.

	Responsibility	Model
France	Local authorities hold responsibility for providing individual exit pathways and priority access to social housing.	Local government-funded CSOs develop and provide individual exit pathways. Temporary residence permits are provided. The model includes interim access to DSGBV shelters, other crisis shelters, and scattered accommodation in the community, followed by priority provision of local authority housing and financial assistance.
Germany	Federal State-funded CSOs provide crisis-counselling centres. CSOs provide specialised shelters. The model is supplemented by other existing infrastructure.	Federal State-funded specialised crisis-counselling centres provide counselling and refer victims to State-funded CSOs providing and coordinating access to specialised accommodation. The provision includes specialised shelters for victims of trafficking in addition to a mix of scattered and sheltered accommodation within the DSGBV model.
Netherlands	Centralised State-funded CSO coordinates State-funded and CSO-managed specialised shelters.	State-funded CSO is contracted to provide central coordination of the placement of victims in shelters that are financed by the State. A network of CSO-managed specialised shelters is provided for third-country-national presumed victims of trafficking. This is followed by local authority housing for identified victims. Dutch nationals can access DSGBV shelters and specialised treatment facilities. Local authorities have organisational and financial responsibility to develop policies to tackle human trafficking and to protect victims.

	Responsibility	Model
Northern Ireland	Centralised State-funded CSO manages specialised DSGBV refugees.	State-funded CSO is contracted to coordinate referrals to specialised DSGBV refugees or scattered apartments. Crisis accommodation in shelters is followed by local authority housing for identified victims. Private ensuite bedrooms and wraparound supports in commercially contracted hotel accommodation for victims who are also applying for international protection. Asylum-seeking victims can benefit from appropriate alternatives to general asylum accommodation which take into account their traumatic experiences.
Scotland	Local authority funds and manages scattered flats in the community. State-funded CSO provides sheltered apartments in a specialised safe house.	Local authority agency provides scattered flats in the community for victims of trafficking for commercial sexual exploitation. ¹ Victims of trafficking for, and impacted by, other forms of sexual exploitation will be referred to a CSO providing sheltered apartments in a safe house for victims of all forms of trafficking. Victims who are also applying for asylum are provided private ensuite bedrooms and wraparound supports in commercially contracted hotel accommodation for asylum seekers.
Sweden	The Swedish Gender Equality Agency ² funds the Swedish Civil Platform and the National Support Programme (NSP) programme, coordinating 20 CSOs to provide accommodation in shelters and in the community.	The Swedish Civil Platform against Human Trafficking coordinates shelter provided by around 20 CSOs and also runs a National Support Programme (NSP) to complement CSO provision. ³ The aim of the NSP is to respond to victims who are not part of a legal process or who do not have the right to reside in Sweden. Sweden acknowledges that it is not meeting its international commitments entirely, and for this reason a new model has been developed and is presently moving through the legislative process.

¹ TARA (Trafficking Awareness Raising Alliance) support women, aged 18 years and over, who have been trafficked primarily for the purposes of commercial sexual exploitation. Victims of trafficking impacted by other forms of sexual exploitation are referred to Migrant Help, the CSO providing safe house accommodation for victims of all other forms of trafficking.

² Swedish Gender Equality Agency (2021) 'Prostitution and Human Trafficking Report 2021:23' link.

³ Swedish Civil Platform against Human Trafficking, National Support Programme 'Annual Report 2022'

Proposed new model

The proposed new model of accommodation for victims of human trafficking for sexual exploitation recognises that safe, appropriate and stable accommodation is a prerequisite for recovery and protection. The core principles of the new model should explicitly recognise the cumulative harms of gender-based sexual violence, sexual exploitation and human trafficking.

The model recommends the provision of timely and accessible accommodation for victims of human trafficking for sexual exploitation. This will include three different types of accommodation.

- Gender-specific, specialist shelters with wraparound support as a short-term or interim option for victims.
- Step-down accommodation to support the transition from specialist shelter to own-door living.
- Own-door Approved Housing Body (AHB) accommodation in the community for victims (and their children) for a period of up to three years.

All accommodation should be victim-centred using a trauma-informed approach. Accommodation should provide wraparound support for victims depending on their individual needs, including but not limited to victims with children, pregnant victims and victims with disabilities, and those with intersectional needs. Targeted supports should include case management, trauma support and counselling, specialist health service access and interpretation and legal support access.

Accommodation should be provided on a consensual and informed basis. Allocation of accommodation should be determined by individual needs and risk assessments, carried out by specialist CSOs and trained caseworkers. Intersectional and complex needs should be recognised and met as they arise.

A high level of regular and specialised training must be mandatory for all staff and personnel involved in managing or delivering accommodation services.

The model should include clear mechanisms for monitoring, inspection and oversight that cover all aspects of individual risk, general operation and infrastructure, whether the accommodation is operated by the State, CSOs, AHBs or local authorities.

This model has been developed following direct consultation with victims and frontline professionals. The model reflects a rights-based, survivor-informed, evidence-driven approach and aims to ensure compliance with obligations under regional law.



Recommendations

Recommendations on compliant transposition of EU framework

1. Ruhama recommends that the State fully transpose EU Directive 2024/1712 (recast EU Anti-Trafficking Directive), where necessary through legislative, regulatory or administrative provisions, by 15 July 2026, in order to meet or exceed the fresh minimum standards adopted by the EU.

(Responsibility: Department of Justice, Home Affairs and Migration (DJHAM) as National Anti-Trafficking Coordinator, Oireachtas)

2. Ruhama recommends that the right to specialist accommodation for all victims of human trafficking be embedded in national law and policy, in line with the provision of the revised EU Anti-Trafficking Directive. Ruhama also recommends the adoption of an explicit policy position clarifying that the above right is independent of the victim's origin, nationality, statelessness, immigration status or pending international protection claim.

(Responsibility: DJHAM/National Anti-trafficking Coordinator; Department of Housing, Local Government and Heritage (DHLGH); Department of Social Protection, Rural and Community Development and Gaeltacht (DSPRCDG), Oireachtas)

3. Ruhama recommends that the standard of accommodation for victims of trafficking in Ireland meet the adopted new EU standards of the revised Anti-Trafficking Directive, in particular:

- Specialist shelters and other interim accommodation must be provided (1) in sufficient numbers; (2) easily accessible to all presumed and identified victims of trafficking; (3) on a consensual and informed basis.
- Safe, adequate and appropriate living conditions must assist victims in their recovery with a view to a return to independent living.
- Victim-centred accommodation must provide targeted and integrated support for victims with special needs, such as victims of sexual violence, victims of violence in close relationships, pregnant victims and victims with disabilities, including trauma support and counselling, health service referral, and interpretation and legal support for immigration and family-related matters.
- Gender-, disability- and intersectional discrimination-sensitive accommodation must be equipped to meet the specific needs of all victims, including the best interests of their children.
- Regular and specialised training for accommodation staff must be an integral part of such accommodation.

(Responsibility: DJHAM/National Antitrafficking Coordinator, DHLGH, DSPRCDG)

4. Ruhama recommends that the State transpose as fully as possible, including through legal, regulatory and administrative provisions where necessary, the EU Directive on Violence Against Women and Domestic Violence by 14 June 2027.

(Responsibility: DJHAM/National Anti trafficking Coordinator, Oireachtas).

Recommendations on application of regional and EU legislative framework

1. Ruhama recommends that the Operational Guidelines for implementation of the Criminal Law (Sexual Offences and Human Trafficking) Act 2024 (CL(SO&HT)) Act 2024 outline clear entitlements and paths to safe and appropriate accommodation at each stage of identification and recovery. Ruhama also recommends that these Guidelines be used to deliver on the provision of gender-specific accommodation for victims of human trafficking, as recommended by the Joint Committee on Justice⁴.

(Responsibility: DJHAM/National Anti-trafficking Coordinator, NRM Operational Committee, support from CSOs)

2. Ruhama recommends that the Housing Act as well as all local authority housing allocation and assistance policies be examined for any anomalies that preclude victims of trafficking from accessing specialist accommodation or local authority housing, and that any barriers to victim accommodation be removed through specific exemptions/waivers or another appropriate policy approach.

(Responsibility: DJHAM/National Anti-trafficking Coordinator, Irish Human Rights and Equality Commission, DHLGH, DSPRC DG)

3. Ruhama recommends the temporary appointment of a Special Rapporteur on Victim Accommodation policies, reporting to the Operational Committee of the NRM, in light of previous fundamental failures to meet the needs of victims of trafficking within the wider international protection agenda. This Rapporteur must have access to NRM data, keep track of accommodation outcomes of every victim in the NRM, prepare regular reports, identify gaps in existing policies and propose remedies for the consideration of the Operational Committee and the National Coordinator (DJHAM).

(Responsibility: DJHAM/National Anti-trafficking Coordinator, NRM Operational Committee)

4. Ruhama recommends the full implementation of the commitments of the NAP on Human Trafficking and the Third National Strategy for Domestic, Sexual and Gender-Based Violence (TNS DSGBV) regarding accommodation of victims of trafficking.

(Responsibility: DJHAM/National Anti-trafficking Coordinator, all relevant implementing and supporting bodies as indicated in the NAP).

5. Ruhama recommends that research be undertaken to explore the pathways of victims through the new NRM, their particular experiences of victim identification within the NRM, and the supports they require through this process. The evidence gathered during the course of this study will support measures to ensure the smooth running and fine-tuning of the NRM at this crucial and opportune juncture when the operations are starting afresh in Ireland, guided by the new legislation and its related guidelines.

(Responsibility: DJHAM/National Anti-trafficking Coordinator, frontline specialist CSOs)

Recommendations based on comparative analysis of seven national models

1. Ruhama recommends the designation of a frontline specialist CSO to hold responsibility for individual pathways of accommodation through multi-agency coordination across all forms of accommodation for all presumed and identified victims of trafficking for sexual exploitation (and other forms of trafficking involving gender-based violence) and accompanying children. This CSO coordinator will conduct individual accommodation needs analysis, coordinate access to safe and continuous accommodation across multiple providers and report to the Operational Committee (incl. the temporary Rapporteur) and DJHAM.

(Responsibility: DJHAM/National Anti-trafficking Coordinator, DHLGH, frontline specialist CSOs)

2. Ruhama recommends increased involvement of local authorities in meeting obligations to provide safe and appropriate accommodation to victims of trafficking, liaising with the Anti-Trafficking Coordinator.

(Responsibility: DJHAM/National Anti-trafficking Coordinator, DHLGH)

3. Ruhama recommends the provision of sufficient resources to specialist CSOs and to local authorities to meet their responsibilities in provision of accommodation to victims of trafficking for sexual exploitation.

(Responsibility: DJHAM/National Anti-trafficking Coordinator, DHLGH)

4. Ruhama recommends the development of pathways to independent housing, ensuring that victims' needs for continuous and longer-term accommodation are met by seamless transitions between all forms of interim accommodation and independent housing.

(Responsibility: DJHAM/National Anti-trafficking Coordinator, DHLGH, DSPRC DG)

⁴ Joint Committee on Justice (2023) Report on Pre-Legislative Scrutiny of the General Scheme of the Criminal Justice (SO&HT) Bill 2022 link.

Recommendations based on consultation with victims of human trafficking

1. Ruhama service users recommend the establishment of a system for ongoing and meaningful consultation with, and feedback from, victims of trafficking for sexual exploitation (including those who have experienced homelessness) in line with Actions 4.1 and 4.6 of the NAP on Human Trafficking.

(Responsibility: DJHAM/National Anti-Trafficking Coordinator, Operational Committee and the temporary Rapporteur on accommodation, CSO for coordination of accommodation for victims of sex trafficking, frontline services and CSOs)

2. Ruhama service users recommend that any model of accommodation chosen by the State show due regard for and incorporate as far as possible the views and recommendations of survivors of trafficking, in particular but not limited to the following:

- Specialised gender-specific, recovery-focused accommodation.
- Private supported accommodation in the community.
- Allocations according to individual need following consultation with caseworker and individual victim.
- Predictable tenure of accommodation that does not include forced relocation without needs and risk assessment.
- Safe, private, and gender-specific living spaces that respect autonomy, dignity, personal safety and family life.
- Choice and autonomy for victims regarding whether and with whom they share bedrooms, bathrooms and private living spaces.
- Pathways from referral to independent living.

(Responsibility: DJHAM/National Anti-Trafficking Coordinator, DHLGH, DSPRC DG, Operational Committee and the temporary Rapporteur on accommodation)

3. Ruhama service users recommend that the planning and delivery of accommodation assistance be predicated on the need for (at least) three years of continuous supported accommodation to eliminate periods of homelessness.

(Responsibility: DJHAM/National Anti-Trafficking Coordinator, DHLGH, DSPRC DG, Operational Committee with the temporary Rapporteur on accommodation)

Recommendations based on consultation with frontline workers

1. Ruhama recommends evaluation of the pilot accommodation, Rosa's Place, with a view to identifying positive practices and any areas for improvement.

(Responsibility: DJHAM/National Anti-Trafficking Coordinator, in conjunction with Depaul Ireland and advisory committee of the pilot)

2. Ruhama recommends that the learning from the evaluation of Rosa's Place and the extensive experience of the domestic violence (DV) sector be utilised to establish gender-specific specialised accommodation in sufficient capacity to protect all victims of trafficking from repeat sexual violence and exploitation, taking into account that some victims are mothers with children and others have disabilities, and ensuring intersectional inclusion.

(Responsibility: DJHAM/National Anti-Trafficking Coordinator, DHLGH and Cuan and the DV sector umbrellas, CSO service providers and AHBs)

3. Ruhama recommends that resources be designated for own-door supported accommodation in the community in sufficient capacity to provide for victims of trafficking for sexual exploitation for whom communal accommodation is not safe or appropriate beyond a crisis period.

(Responsibility: DJHAM/National Anti-Trafficking Coordinator, DHLGH, DSPRC DG, AHBs)

4. Ruhama recommends that service providers working with women who are at high risk of trafficking for sexual exploitation be offered training towards developing guidelines and policies for early detection and referral of individual victims and their families into the NRM and appropriate specialist services.

(Responsibility: DJHAM/National Anti-Trafficking Coordinator with all government departments and agencies outside of the NRM scope)

5. Ruhama recommends that the needs of victims of human trafficking impacted by sexual exploitation and other forms of gender-based violence be included in the development of the National Services and Accommodation Development Plan within the Third National Strategy on DSGBV.

(Responsibility: DJHAM/National Anti-Trafficking Coordinator, Cuan, frontline CSOs responding to victims of human trafficking for sexual exploitation)

Ruhama

4 Castle Street, Dublin 2

T: +353 1 8360292

E: admin@ruhama.ie

www.ruhama.ie

f @RuhamaIreland

X @ruhamaagency

ig @ruhamaagency

in @ruhama

National Freephone: 1800 02 02 02

Company Registration Number: 209799 CHY:10733

Registered Charity Number: 20027897



Our Funders



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



CUAN

An Ghníomhaireacht um Fhoréigean Baile,
Gnídasach agus Inscrébhúimáithe
The Domestic, Sexual and
Gender-Based Violence Agency



Community
Foundation
Ireland




Ruhama
Fighting Sexual Exploitation, Prostitution and Human Trafficking