

# Summary

## The programme-based approach to combating human trafficking

### Plan and process evaluation of a *pilot*

#### Background, research questions and method

The recent approach to combating organised crime in the Netherlands emphasizes the importance of interventions aimed at the underlying 'facilitating structure' of crime. A great deal of attention is being devoted to professions, companies and services that – consciously or unconsciously – facilitate crime in a structural manner. In addition to a repressive approach to this type of crime, structural hindrances should also be created to aid in combating organised crime. This means that investigative services have to work closely together with each other and other relevant agencies. On the basis of this perspective, the Public Prosecution Service developed the 'programmatic approach'.

The programme-based approach is innovative because it envisions the implementation of an intensive cooperation and exchange of information between the various investigative agencies and other services. In addition, administrative partners are encouraged to become more involved in the combating of organised crime. In the programmatic approach, the investigation of suspects goes hand in hand with the aim of realising structural policy-based changes. The programme-based approach was first tried out as a *pilot* in 2006 in the field of Human Trafficking (trafficking for sexual exploitation), during the *Sneep* investigation.

The intention is to start the programme-based approach on the basis of one specific case. On the basis of one police investigation into a specific group of offenders, the general, underlying problems can be identified. In addition to the *Sneep* investigation other divergent sub-investigations should be performed to gain optimal insight into the group of offenders. The findings of the (sub-) investigations could also contribute to the expansion of the knowledge concerning the manner in which persons, companies and government services – consciously or unconsciously – play a facilitating role in the activities of the group of offenders. Related sub-investigations could be performed by various regional police forces, and additionally by relevant investigative partners such as the KMAR (Royal Marechaussee), the FIOD-ECD (Fiscal Intelligence and Investigation Service and Economic Investigation Service) and the Social Security Information and Investigation Service (SIOD).

In the choice of chain partners to be involved in the programme-based approach, it is the intention to make use of the so-called 'barrier model'. With respect to transport, establishment and obtaining the official documents required, prostitutes have to overcome barriers in the fields of admission, housing, identity, labour and financial matters. The help that they can receive in these areas

can be provided by legally or illegally operating actors in these fields. The Sneep investigation and related sub-investigations focus on the role these actors play in the facilitation in each of those various fields.

The information from the various investigations and various police regions should be shared intensively. In this manner, efforts are being made to obtain more in-depth and current information on the relevant phenomenon in order to be able to act more 'decisively', both repressively and preventively.

The plan furthermore comprises the intention to involve public administration during the investigation, and to share information with them. On the basis of information from the investigations, the public administration could be informed of gaps in government policy and of elements from criminal files that government agencies could deal with in an administrative-law manner. Public administration reports will be drawn up by the National Crime Squad during the investigation process, which will provide (in anonymous form) a crime image of the group of offenders, and on the basis of which public administration advice can be formulated. The administrative reports, and the public administration advice formulated in them, will therefore be aimed at government agencies that – unconsciously and unintentionally – act as facilitators in the criminal network.

The programme-based approach is new; there is little experience with the working method and there is still little known about the intentional and unintentional consequences of the new approach. This investigation therefore studies the plan and process of the programme-based approach, in order to establish which assumptions are at the basis of the approach, whether the programme-based approach is implemented in the intended manner, and what the consequences are.

The central questions of this investigation are:

*Which policy theory forms the basis of the programme-based approach to combating human trafficking?*

*In what way is the programme-based approach implemented in practice? What are the consequences?*

The findings of this report are based on interviews with officials who are involved in the development and implementation of the programme-based approach (see Annex III for an overview of the key informants). Interviews were conducted with 43 informants (police officials, investigation officials, policy-makers and employees and mayors of municipalities). The interviews were supplemented with an analysis of the substance of documents (policy plans, newsletters, minutes of meetings, criminal files, indictments, court verdicts). During the analysis of the empirical material, information from each interview was each time confronted with information from other interviews and with information from documents.

#### *Research period*

The interviews with key informants were conducted between December 2006 and November 2008 (whereby most activity took place in the period of August 2007 to September 2008). During this period, all relevant documents were collected as well. A number of the key informants were consulted several times

during the research period about specific aspects of the implementation and about developments in the field. The research period overlaps – to a large extent – with the period in which the programme-based approach was implemented, and during which the investigations were concluded and brought before the courts (in first instance).

This evaluation investigation reconstructs the period from the start of the programme-based approach up to a number of months following publication of the administrative report. This means that a picture was obtained of the most important facets of the implementation of the *pilot* of the programme-based approach and of a number of (short-term) consequences of that implementation.

It is, however, impossible – as a result of the time span of the investigation – to identify the medium and long-term consequences as well. The completion of the empirical data collection at the end of 2008 necessarily entails the conclusion that no statements can be made in this evaluation on whether the objectives that relate to long-term changes, such as implementing structural and sustained obstructions to human trafficking, will be attained. In order to establish this result, it would be necessary to systematically map out – at a later stage – whether, and in what way, policy (concerning human trafficking) was implemented in a sustained manner. This evaluation is for that reason primarily focused on the plan and the implementation of the programme-based approach. The consequences of the implementation are discussed in this report to the extent that they become clear during the research period, and to the extent that they are clearly related to the implementation of this programme-based approach *pilot*.

#### *'Counterfactual'*

When identifying the (short-term) consequences of the programme-based approach, the question needs to be asked as to whether the results are actually a consequence of the new approach. What would have happened if the programme-based approach had not been implemented? It was not possible to establish this 'counterfactual' premise in a systematic manner in this investigation. It was impossible to perform a zero-measurement, nor did the investigation situation offer the opportunity to choose a comparable (natural) control situation.

This report does try, where possible and in connection with the description of findings, to make a comparison between the situation as it would 'normally' occur during criminal investigations, and the situation occurring in the 'new approach'. Those comparisons are based on information from key informants, supplemented with information from literature on investigations. Where a comparison is made (in the empirical chapters) with the 'usual' situation (i.e. without application of the programme-based approach), an indication is given as to what this comparison is based on.

As regards the place and position of the persons put forward in this report, we make a rough division into two categories in this text: on the one hand we speak of *professionals* (team leaders, analysts, public prosecutors handling the case), and on the other hand *supervisors* who are part of the management group (chief public prosecutors, departmental heads, chiefs of police, directors) and who are

usually affiliated with the National Public Prosecutors' Office or the National Crime Squad.

### **Assumptions**

If we wish to establish whether government policy is effective, it is important to devote attention to the implied 'theory' which lies at the basis of the policy. The choice for a certain intervention or policy strategy is accompanied by (implicit) assumptions on the operation of the intervention. Knowledge of the correctness of those assumptions offers insight into the question of *how* a certain programme works and *why* it does or does not operate in the desired manner. That is why it is of first and foremost importance for this evaluation to establish the assumptions that are at the basis of the programme-based approach. How is the approach supposed to work according to those who drew up the new policy? What is the implicit 'theory' behind the policy measures? Why do the policy-makers and officials involved think that the new approach will lead to the intended results?

The assumptions have been elaborated in four chronological steps. Two processes arise after the first step: a criminal process and an administrative process.

#### ***Assumption 1***

*Publishing concrete information from the criminal file on offenders, their activities and the damage caused, will lead to awareness of the seriousness of the problem, and to commitment among related agencies.*

The first step in the programme-based approach is to involve agencies that are co-responsible for combating the problem. The so-called 'barrier model' is used in the choice of chain partners. With respect to transport, establishment and obtaining the official documents required, prostitutes have to overcome barriers in the fields of admission, housing, identity, labour and financial matters. The help that they can receive in these areas can be provided by legally or illegally operating actors in these fields. The Sneep investigation and related sub-investigations focus on the role these actors play in the facilitation in each of those various fields..

One way of putting the relevant problem, in this case human trafficking, on the agenda of other services, is to make the seriousness of the problem visible. By communicating concrete examples from the criminal file to other services, these services should become more aware of the problems. In this manner, their involvement in the approach to combating these problems could be realised.

#### ***Assumption 2***

*Awareness and involvement of related investigative agencies lead to active cooperation in information gathering, through the performance of sub-investigations.* Awareness of the seriousness of the problem would cause partners to take responsibility and to contribute actively to the gathering of information on the group of offenders and the actors that facilitate them, both legal and illegal actors.

***Assumption 3***

*The performance of sub-investigations in the various fields by investigative partners leads to information on suspects and on the conscious and unconscious facilitators of the group of offenders.*

The gathering of information and the sub-investigations performed by partners provide insight into the conscious and unconscious facilitators of the group of offenders and, in addition, (more) information on the group of offenders themselves.

***Assumption 4***

*Information on illegal facilitators (derived from sub-investigations) leads to the exchange of information between relevant investigative partners;*

*Information on legal facilitators (derived from sub-investigations) leads to the exchange of information between relevant investigative partners and public administration partners. (administrative process)*

The knowledge gathered by chain partners with regard to conscious and unconscious facilitators will be constantly shared with relevant partners. Knowledge gathered with regard to conscious facilitators and other suspects will be shared with other investigative partners and will be included in the criminal investigation.

Where it concerns knowledge of the manner in which government agencies (for example municipalities) play a facilitating role in criminal activities, this knowledge will be shared with public administration partners during the investigation, in the form of administrative reports, in which public administration advice is issued.

This report investigates to what extent and in what way the implied steps described above have occurred in practice during the *pilot*. It is first established whether the implementation occurred in accordance with the plans. Subsequently, the consequences of the steps performed (or not performed) and the correctness of the assumptions are considered.

**Involving investigative partners**

The Sneep investigation, performed by the National Crime Squad, was used in this *pilot* as a 'specific image' of human trafficking. The Board of Procurators General has invited delegates of selected investigative agencies (KMar, the SIOD, the FIOD-ECD, MOT/BLOM, BOOM, the Alkmaar, Utrecht and Amsterdam regional police forces) for an information meeting on the criminal case. The delegates were presented with an idea of the seriousness of the human trafficking problem on the basis of details from the criminal file (photos, camera footage, stories, quotes). After the presentations, all delegates were of the opinion that it concerns a serious social problem. All those invited also indicated their willingness to cooperate in combating this problem.

The above-mentioned implied step (concrete information from the criminal file leads to awareness and involvement on the part of chain partners), was implemented according to plan and turned out to be correct in this *pilot*. The suffering of the victims as presented by the criminal file served as a 'flywheel' and created support for the new approach.

The delegates of the investigative partners promised their cooperation and took, together with delegates from the National Public Prosecutors' Office and the National Crime Squad, a seat on the 'steering group' of the pilot of the programme-based approach. The steering group was to meet regularly (under the chairmanship of the deputy Chief Public Prosecutor) to discuss the start and progress of the various investigations and to coordinate the investigations. The steering group's aim was to keep the participating organisations 'on board' and take decisions if a problem occurred somewhere in the field of research.

Although all delegates said '*yes, we are in*' at the inaugural meeting, the cooperation of the partner organisations in practice sometimes did not get off the ground. Sometimes there was cooperation, but not in the way that was expected. Sometimes cooperation did not happen until after a great deal of effort and delays. How can this discrepancy between the commitment made by the steering group members and the cooperation's failure to occur be explained?

In the first place, the plan to have partners perform general phenomenon research into a partial aspect on the basis of their specific knowledge did not get off the ground properly. For the professionals charged with the performance of the partial investigations it was unclear what was demanded of them. They were used, from an investigation background, to performing criminal investigations into concrete subjects and objectives, but now they were asked to do something else, namely cooperation in 'the broader picture'. The broad formulation of the assignment caused a lack of clarity. As time passed, these partial investigations into the 'general phenomenon' tended to take on the form of concrete investigations into individual suspects who work as pimps.

In a more general sense, it was often unclear to the professionals, at the start of the investigations, what the programme-based approach effectively involved. They heard different, sometimes contradictory, stories, and their own specific duty was unclear to them. The lack of clarity concerning the duties and the implementation appeared to have a discouraging effect on the participating partners, who, as it turned out, quickly reverted to their familiar and traditional way of working.

Secondly, insufficient communication between supervisors and professionals sometimes caused difficulties in the cooperation from investigative partners. Confusion and ignorance of duties, division of duties and objectives appeared – at times – to be attributed to this inadequate internal communication within the organisation of a relevant partner.

Thirdly, it appeared that the importance that interested partners attach to the cooperation is related to the priorities of their own organisation or their own department within the organisation. The start of an investigation may be delayed if police team leaders have doubts about the 'proceeds' of the partial investigation for their own organisation or their department. Investigative personnel of participating chain partners may exercise their power to obstruct if they are unconvinced of the use of the cooperation for their own organisation, which causes the start of the investigation to progress slowly. In some cases the performance of a partial investigation by interested partners was refused entirely, despite earlier promises, because it did not fit in with the objective of their own organisation.

We also see the reverse reaction, namely the added value of active cooperation in the programme-based approach for the own organisation, the own department or the own 'person'. This relates to the advantage of gaining new experiences by cooperating in a large, national investigation or the status that accompanies the cooperation.

It is, in other words, important that there is mutual interest in the cooperation. Awareness of the problem and the intention to contribute to the solution is not sufficient to actually proceed with implementation of the partial investigations. In short, it turns out in the practice of this case that Assumption 2 is incorrect, because the active cooperation of partners in the programme-based approach should also result in some benefit for the own organisation or for the individual employees. It turns out that cooperation by chain partners gets properly off the ground in particular if the cooperation in the programme-based approach has added value for the relevant organisation.

Failure to perform phenomenon and partial investigations into facilitators naturally had consequences for the follow-up steps. It turns out that performance of partial investigations and the active participation of chain partners do not automatically lead to increased knowledge of facilitators (Assumption 3). The investigations contracted out in particular provided no or hardly any information on companies and agencies that allegedly play an unconscious role.

### **Influence of the programme-based approach on the police investigation**

Employees involved in the police investigations were faced with elements of the programme-based approach in various ways. We were able to distinguish four aspects in the interviews we conducted. 1) exchange of information; 2) expansion of the network; 3) restricting autonomy and 4) the provision of information to the media.

#### *Added value of the exchange of information*

Professionals point out the added value of the exchange of information between the various ongoing investigations. This concerns mainly *tactical* information, i.e. factual information on suspects that provides new starting points for the ongoing investigation, information with which the investigation can be helped further along. The exchange of information was also used to verify information based on one source with information from another source from a different partial investigation. In practice, tactical information is mainly shared between police analysts.

#### *Expansion of the network*

Consultations within the context of the programme-based approach offer professionals the opportunity to expand their network. In particular team leaders came into contact with employees of other investigative agencies by working in a programme-based manner. This personal meeting ensured that contact with other organisations was established more easily and more quickly than previously. The various consultation structures that took place on the shop floor within the context of the programme-based approach contributed to an expansion of the professionals' network. This could result in benefits for the coopera-

tion between persons in the various organisations in the long term and in future investigations as well.

#### *Restriction of autonomy*

The programme-based approach also resulted in divergence of the interests of 'the programme' and the steering group on the one hand and the interests of the individual, tactical investigations on the other. This conflict of interests was primarily expressed in a restriction of the professionals' ability to act autonomously. While the programme-based approach results in an expansion of the network of employees, it also results in a restriction of the autonomy of that same group.

It is, however, quite common for supervisors at the National Public Prosecutors' Office (LP) to monitor the progress of the investigation during investigations performed by the LP (which is closely watched by society and the world of politics). There may also be involvement in the investigation, in particular where it concerns the image of the criminal case.

The extent to which there was interference in the tactical investigation in the present investigations was, according to many key informants, however, exceptional. The reduced decision-making powers mainly concern the investigative team of the Sneep criminal case, but those who perform other partial investigations are also faced with this. Discontent expressed by professionals about the programme-based approach can to a large extent be traced back to the intensive interference of supervisors in decisions at operational level, such as the moment of arrest or the moment at which special investigative resources are deployed. This friction between supervisors and professionals can be related to the introduction of a new way of working and the (as yet) lack of a commonly shared vision. The importance of 'vertical communication' during change processes and the elaboration of a joint vision is dealt with below in this summary.

#### *Openness in the media*

Senior management of the Public Prosecution Service consciously sought the attention of the media in respect of the arrest of the suspects in the Sneep criminal case. The aim was to use the publicity that was generated to put the subject of human trafficking on the agenda of the partners and to communicate the seriousness of the problem.

Professionals of the various partial investigations are of the opinion that some of published information is *so* detailed, that it would contain information only known to the offender which could hinder the performance of ongoing investigations. The professionals also refer to the potential undesirable consequences of the detailed information for the victims.

### **Involving public administration partners**

In 2007, delegates from the senior management of the Public Prosecution Service conducted several consultations with municipalities. In addition, an administrative report was drawn up as part of the programme-based approach, in which an image of human trafficking is provided, and policy recommendations are made for government agencies that may play a part in implementing structural obstructions against human trafficking.

*Administrative reporting*

The intention was that the administrative reporting would mainly provide a description of the group of offenders and their modus operandi, in order to provide the various administrative with insight into these matters. But practice shows that the information from the Sneep criminal file does not provide sufficient insight into the role of legal, unconscious facilitators such as the Chambers of Commerce or municipal supervisory authorities. Nor did the partial investigations provide much knowledge about unconscious facilitators. The findings of the criminal investigations therefore do not provide sufficient starting points to formulate administrative advice. (In the context of the programme-based approach, administrative advice refers to policy recommendations for government agencies at the national and municipal level.)

The NR investigators decided to perform additional research that runs parallel to the Sneep investigation, and to focus primarily on the identification of human trafficking by government agencies that have a controlling and supervisory role. One of the conclusions is that municipalities play a very limited role in the identification of human trafficking. It further concludes that if useful indications of human trafficking are indeed found, this does not lead to investigation and prosecution in all cases.

Municipal officials were surprised at the 'late' moment at which they were informed of the content of the report. The Sneep investigation had been going on for well over a year and the consultations between the municipalities and the Public Prosecution Service had therefore been going on for several months. In hindsight, the Public Prosecution Service officials are also of the opinion that senior management was involved too late in the programme-based approach and in the exchange of information concerning the Sneep criminal case.

The term 'administrative reporting' seems to be interpreted in different ways. While it is clear to the steering group members involved that a report is to be published containing administrative advice, municipal officials, when they hear the term 'administrative reporting', think of a 'administrative file' that contains specific information concerning, for example, names and addresses of catering establishments or persons who lease out apartments. They could use this operational information to examine permits and contribute in an administrative-law manner to the combating of human trafficking. This exchange of operational information with the public administration did not occur during this *pilot*.

*Influence on the policy process of the public administration*

Municipal officials are positive about the programme-based approach where it concerns putting the human trafficking problem on the agenda. This concerns the manner in which the combating of human trafficking is placed on the political agenda and, as a result, can count on broad political support, at both the local and the national level. There seems to be more attention for the *issue* of human trafficking in the prostitution sector and the subject has climbed higher on the agenda of politicians as a result of the programme-based approach. According to partners of the public administration, the exchange at the official administrative level contributed to this, as did the administrative advice formulated on the basis thereof. Municipal officials also refer to generated media attention where it concerns political attention for the subject. The Public Prosecution Service published information on the criminal case, by means of news-

papers and television, immediately after the arrests (of the suspects in the Sneep criminal case), in order to communicate the seriousness of the problem. According to municipal officials, the media attention for the Sneep criminal case had a positive effect on the progress of local policy processes; there seems to be more political support and increased social support than before for combating human trafficking in the prostitution sector. It therefore seems that municipalities benefit from the generated media attention: it helps them make quicker policy decisions.

### **The importance of a common vision**

The reconstruction of the implementation process of the programme-based approach reveals one consequence of the approach that can be characterised as 'unintentional' and 'undesirable'. This concerns the divergent interests of the supervisors of the programme-based approach on the one hand and the professionals of the investigative agencies on the other, as was discussed above. The divergence of the interests in some aspect is not so much based on the substantive characteristics of the programme-based approach, but is mainly related to the organisational structure of the approach, as it currently manifests itself in this first *pilot*.

Supervisors and professionals are both motivated to combat human trafficking. Nevertheless the interests seemed to diverge at some points. In the combating of human trafficking, the steering group focused its attention primarily on the successful implementation of the programme-based approach (on the basis of the political will to put the issue on the agenda and to implement structural and sustained obstructions), while the professionals focussed on the 'traditional' criminal investigation (on the basis of the will to obtain legal evidence and a legal conviction of the suspects). A common vision seemed to be lacking in the implementation of the *pilot* of the programme-based approach. The gap between the *visions* of the supervisors and the professionals was not bridged to a sufficient extent; it seems that each time they were not sufficiently aware of the vision, objective, working method and motives of the other party. Communication between the professionals and the steering group – the vertical communication – was not effected sufficiently during the implementation of the programme-based approach, which meant that both parties did not gain sufficient insight into each other's motives and vision. It is important, especially during change processes, that the vision of the approach and the objective are communicated broadly and convincingly throughout the organisation. The study performed by Visser et al. shows that the role of an official who acts as a link between supervisors and professionals is of great importance for the communication between supervisors and professionals. A task has been set aside in this context for supervisors who operate between the shop floor and the management of an organisation. Their role in the communication between steering group and professionals is of importance to communicate both the perspective of the investigative teams and that of the supervisors. A one-sided *top down* process could be replaced with a interaction between a *top down* and a *bottom up* approach. During the implementation of the programme-based approach, none of those involved explicitly took on this 'linking' role.

## **The implementation's strong and weak points**

### *Strong points*

The investigations provide a number of implementation aspects of the programme-based approach that have a positive influence on the cooperation between the partners and on social awareness of the human trafficking problem. In the first place, the various consultations that occurred within the context of the programme-based approach ensured that tactical information on suspects was exchanged between the various ongoing investigations. But the various consultations also turn out to have another function, namely that of providing the opportunity to expand the own network. This is an unintentional positive consequence of the programme-based approach. The various consultation structures that take place on the shop floor within the context of the programme-based approach contribute to an expansion of the professionals' network. The horizontal communication between participating partners was therefore effected adequately during the programme-based approach. This could result in benefits for the cooperation between persons of the various organisations in the long term and in future investigations as well.

Secondly, the programme-based approach has brought the issue of human trafficking to the attention of the relevant organisations and chain partners. Specific information from the Sneep criminal case was communicated during the meeting to other investigative and administrative agencies and has contributed to an increased awareness of the seriousness of the problem of human trafficking. Information from the Sneep criminal case was also communicated through the newspapers and television. As a result, municipalities now devote more attention to the subject of human trafficking in the legalised prostitution sector; the subject is high on the political agenda and the attention seems to have speeded up the local political policy process. It is likely that the attention generated by the programme-based approach will have an accelerating effect on the development of new legislation and on new or already long-running (local) policy plans aimed at combating human trafficking.

### *Bottlenecks in the implementation*

In a number of areas, the programme-based approach was not implemented according to plan. Firstly, the implementation of 'general phenomenon research' was not effected. The performance of partial investigations by interested partners did not lead to more information about conscious or unconscious facilitators. This may be related to the nature of the present criminal case and the present subject (human trafficking), it may also be related to the complexity of the term 'phenomenon research'. The term can be called 'controversial' within an investigative context, because there has been debate and lack of clarity concerning its precise meaning and working method since 1992. It turns out that the term also generates confusion and misunderstanding in the context of the programme-based approach.

Secondly, the early involvement of the public administration was not effected properly during the implementation of the programme-based approach. This meant that no exchange of information by municipalities took place for the purpose of the criminal investigation. Nor was operational information from the investigation shared with the public administration. Administrative action, for

example as regards permits held facilitators such as operators of window prostitution locations or landlords, did therefore not take place.

The implementation of the programme-based approach was satisfactory in some areas and unsatisfactory in others. It is clear that this *pilot* contributed to prominence on the agenda and increased awareness, with regard to the problem of human trafficking. Increased awareness among partners does not necessarily lead to active partner participation nor does it necessarily lead to extra information on facilitating actors. Nor does a more prominent placement on the agenda necessarily lead to concrete public administration measures against facilitators, as the public administration would require tactical information from the investigation for this purpose.

However, this does not mean that it would not be a good idea to focus strongly during the combat against organised crime on companies and agencies that play a facilitating role. The question that should be asked is, which elements of the programme-based approach actually provide extra information on facilitators and establishments, and which interventions are well-suited to deal with the exposed facilitation structure? When answering those questions, the specific context in which the programme-based approach is implemented will be of great importance.

### **Context of the programme-based approach**

In this *pilot*, the programme-based approach was implemented in the area of human trafficking. The hypothetical question may be asked whether these steps – in a different context – would lead to the same results. Or is it to be expected that different assumptions will be plausible in respect of different forms of organised crime? We limit ourselves here to discussing two assumptions; one that turned out to be correct and one that turned out to be incorrect during the human trafficking *pilot*.

The first assumption (increasing awareness of partners by making the seriousness of the problem visible) turns out to be correct in the context of human trafficking. The seriousness of the problem of human trafficking is illustrated by shocking footage and moving stories of victims, and the partners who were approached immediately agreed to cooperate. The question is whether this approach would result in the desired effect in respect of other forms of crime. Are there also shocking footage and stories of victims of, for example, marijuana cultivation or real estate fraud? It would seem plausible that the (social) damage sustained as a result of real estate fraud and marijuana cultivation is more abstract and that related victimisation is less concrete and less visible.

This could have consequences for the correctness of this assumption in other areas of organised crime.

The third assumption (partial investigations provide an image of the facilitators) turns out to be incorrect in the context of human trafficking. The lack of an image of the facilitators during this *pilot* could be attributed to specific characteristics of human trafficking, in particular to the *modus operandi* of the group of offenders from Sneep.

The question is whether, during investigations of other forms of organised crime, perhaps more information will be brought to light on conscious and unconscious facilitators. For example, in the event of real estate fraud one might think of involvement of all sorts of professions and agencies such as civil-law notaries, real estate agents and property traders. It is likely that those facilitators will come into view in the criminal files as suspects or unconscious facilitators. In the event of marijuana cultivation one might think, for example, of growers, energy suppliers and storage companies.

The extent to which facilitators are brought to the fore in a criminal file seems to depend on the context. Depending on the criminal organisations and the type of crime, it will be possible to trace more or fewer specific facilitators and agencies. It is therefore recommended that the selection of chain partners does not take place so much on the basis of a predefined theoretical (barrier) model, but rather on the basis of the specific knowledge that exists on the group of offenders or the phenomenon.