

Maldives
Anti-Human Trafficking
Strategic Plan
2026–2028



Anti-Trafficking in Persons Office
Ministry of Homeland Security, Labour and Technology
Malé, Republic of Maldives

Maldives Anti-Human Trafficking Strategic Plan 2026 – 2028

Plan Cycle: May 2026 – April 2029

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Foreword

The Maldives is an open, outward-looking nation whose prosperity is built on global connectivity, tourism, and the contributions of a diverse workforce. Our openness to the world is not only the cornerstone of our economic success; it is also a reflection of our values as a nation. With openness comes the obligation to ensure that no person—Maldivian or foreign national—is subjected to exploitation, abuse, or coercion under our flag, and that our economic progress is never achieved at the expense of human dignity.



Combatting human trafficking is one of the defining tests of any modern, open society. It is a test of governance, of compassion, of the rule of law, and of our willingness to confront difficult truths. The government has approached this test with deliberate seriousness. When I assumed office in November 2023, my administration inherited a labour ecosystem in which more than 86,000 unverified work permits had been issued to foreign workers, and in which approximately 87 per cent of foreign workers in the country lacked biometric records within State systems. Today, those numbers have been reduced by approximately 77 per cent and to approximately 5 per cent respectively. That transformation did not happen by accident. It required political will, inter-agency coordination, and the courage to undertake reform at a scale this country had not seen before.

This Administration has, in two further respects, given practical effect to the Human Trafficking Prevention Act in ways previous administrations did not. First, the issuance of a National Action Plan on Human Trafficking, though a legal obligation under law, was, previously, never carried out. We issued the first such plan in 2025. Second, the annual report on national anti-trafficking efforts required to be submitted to the People's Majlis, also a statutory obligation, was never previously done. This Administration submitted the first such report last year. This Strategic Plan 2026–2028 is the next step in that journey: a three-year framework, with annual milestones aligned to the law's annual cycle, that delivers continuity of institutional change while honouring the legal requirement to plan and report year by year.

This Plan is anchored in six pillars of national response: Governance and Legal Reform; Prevention, Awareness and Demand Reduction; Deterrence, Detection, Investigation and Prosecution; Victim-Centred Protection; Cooperation and Partnerships; and Evaluation and Accountability. Together, these pillars reflect a comprehensive approach that seeks not only to respond to trafficking when it occurs, but also to prevent it, protect victims, strengthen accountability, and continually improve our national systems and capabilities. Our commitment to labour rights and worker protection remains central to this effort. The government has enacted landmark reforms in industrial relations and occupational safety, strengthened the Employment Act, and brought together, under a unified governance framework, the agencies responsible for managing every stage of a migrant worker's journey—from recruitment and entry to employment, compliance, and enforcement. Effective labour governance is one of the strongest safeguards against human trafficking, and we have invested deliberately in building that foundation.

My vision for the Maldives in this domain is clear: a nation in which where every person, regardless of nationality, language, gender, or circumstance, can live and work in safety, dignity, and freedom from exploitation. A nation where prevention comes first, victims are protected with compassion and respect, institutions act in concert, and traffickers are held to account through credible enforcement and justice. Achieving this requires courage to confront the gaps in our own performance and the persistence to close them. This Plan is the instrument through which the government will pursue that vision over the next three years.

Dr. Mohamed Muizzu

President of the Republic of Maldives

Minister's Message

The expansion of my portfolio on 14 April 2026 to include the labour function has, for the first time in the Maldives' modern administrative history, brought together within a single ministerial mandate the agencies that determine, monitor and enforce the lawful presence and employment of every foreign worker in the Maldives. The Maldives Police Service, Maldives Immigration, Maldives Customs Service, the Labour Relations Authority and the Department of Foreign Labour now all sit within the Ministry of Homeland Security, Labour and Technology. This becomes the operational foundation of a more integrated counter-trafficking response.



The experience of a worker is seamless. A worker does not separate immigration status from employment conditions, workplace safety from access to justice, or recruitment practices from vulnerability to exploitation. Neither should governments. When institutions share systems, share data and share accountability, we create the line of sight across the labour ecosystem that exploitation has long depended upon obscuring. For the purposes of this Plan, this principle is plainly stated: unified labour governance is anti-trafficking infrastructure.

Maldives Anti Human Trafficking Strategic Plan 2026–2028 reflects consolidation of the seamless effort against human trafficking. It commits the Ministry to sustained capacity-building across all enforcement and inspection actors. It strengthens the Anti-Trafficking in Persons Office (ATO) through the operationalisation of the Operational Working Group—a model that draws specialist personnel from across the Maldives as needed, multiplying the ATO's effective capacity without imposing an unsustainable establishment ceiling. And it commits the Ministry to honest engagement with our international partners—including countries, European Union, the United Nations Office on Drugs and Crime, the International Organization for Migration, the International Labor Organization and the Bali Process—on the gaps we acknowledge and the progress we are delivering.

Human trafficking thrives in fragmentation, opacity and institutional distance. This Plan is built on the opposite principle: coordination, accountability and unified state action. The Maldives is strengthening its systems not only to enforce the law, but to uphold the dignity, safety and rights of every person who lives and works within our borders. That is the standard we are setting for ourselves, and the direction in which this Government will continue to lead.

Ali Ihusaan

Minister of Homeland Security, Labour and Technology

NAHTCC Chairperson's Statement

I present this Strategic Plan, drafted by the Anti-Trafficking in Persons Office (ATO) in consultation with stakeholders and partner agencies, with both candour and confidence.

Candour, because this Plan presents an honest assessment of the Maldives' current performance in addressing trafficking in persons, neither minimised nor overstated. During the most recent reporting period, no victim of trafficking was formally identified under the criteria established by the Human Trafficking Prevention Act, and no conviction was secured. The ATO continues to operate as a small office relative to the breadth of its mandate. Furthermore, as confirmed during the 2025 National Conference, awareness and understanding of the Human Trafficking Prevention Act among key stakeholder groups remain insufficient. These realities are acknowledged openly in this Plan.



Confidence, because the institutional foundations on which we will now build are stronger than at any point since the enactment of the Human Trafficking Prevention Act in December 2013. The National Anti-Human Trafficking Coordination Committee (NAHTCC) has been reconstituted under criteria requiring policymaking-level representation. The Operational Working Group (OWG) has been formed and is operational. A Preliminary Screening Tool has been developed and piloted under Operation Kurangi. The Migrant Workers Resource Centre, together with the Migrant Connect Portal, has been established. The first National Action Plan under the Act was issued in 2025, and the first statutory annual report to the People's Majlis was submitted in the same year. In parallel, the biometric registration and work-permit regularisation measures undertaken through Operation Kurangi have substantively addressed several long-standing systemic gaps. These are foundations on which a three-year strategic plan can credibly stand.

This Plan adopts a three-year horizon, supported by annual milestones aligned with the May-to-April planning cycle. This approach reflects a practical recognition that an annual planning process alone—where substantial staff time is consumed each year in producing an entirely new plan—is neither sustainable nor efficient. A multi-year strategic framework, combined with annual milestones and revisions, provides continuity, accountability, and a realistic workload for the specialised team supporting this Committee. The methodology outlined in Chapter Nine ensures that the statutory requirement for annual review and revision is fully satisfied.

Three deliberate choices underpin this Plan and deserve particular emphasis.

First, the Plan places substantial emphasis on foundational awareness and legal literacy. This includes the reproduction and explanation of the statutory definitions of trafficking, exploitation, and debt bondage, together with the wider constellation of related laws. This decision responds directly to the findings of the 2025 National Conference, which highlighted that many actors directly engaged in prevention, identification, and enforcement remain insufficiently familiar with the legal framework and the evidentiary threshold

required to establish the offence. Second, the Plan recognises trafficking in persons and unregulated migrant labour as matters with significant national security implications, encompassing economic, health, and social dimensions. Accordingly, counter-trafficking efforts are treated not as an isolated administrative function, but as an integral component of the Maldives' broader national security architecture. Third, the Plan acknowledges the geographic realities of the Maldives as a dispersed island nation. It therefore embeds Island Councils as active partners in awareness-building, identification, and inspection efforts across the atolls, bringing the work of this Plan to the geography in which our people live.

In presenting this Plan, a deliberate decision was also made to define and explain key legal concepts and response mechanisms in greater detail than is traditionally found in strategic documents. This approach reflects the consistent concerns raised during consultations convened by the ATO since July 2025—including at the 2025 National Conference—regarding the limited understanding of trafficking offences and the legal thresholds established under Maldivian law.

This Plan marks a beginning, not a conclusion. The next three years will test our collective resolve, institutional maturity, and national commitment. I remain confident that we will meet that challenge together.

Dr Abdulla Phairoosch

Chairperson, National Anti-Human Trafficking Coordination Committee
Minister of State for Homeland Security, Labour and Technology

Acknowledgements

This Maldives Anti-Trafficking Strategic Plan 2026-2028 is the product of sustained collaboration across the Government of the Republic of Maldives, state institutions, civil society organisations, and international partners. The Anti-Trafficking in Persons Office (ATO) records, with sincere appreciation, the contributions of all those whose efforts, expertise, and engagement have shaped this document.

The Government expresses its gratitude to the members of the National Anti-Human Trafficking Coordination Committee (NAHTCC), representing the stakeholders recognised under the Prevention of Human Trafficking Act, whose presentations on institutional work, operational challenges and achievements during the final quarter of 2025, together with their written and oral contributions, materially informed the development of this Plan.

Particular appreciation is also extended to the members of the Operational Working Group (OWG), established under the ATO in July 2025, whose sustained technical engagement and inter-agency coordination efforts contributed significantly to the shaping and operational direction of this Strategic Plan. The Government further expresses its gratitude to the civil society organisations that participated in the 2025 National Conference and in the consultations that followed, including the focused stakeholder discussions held in December 2025. Their perspectives and recommendations were instrumental in strengthening the practical and community-centred dimensions of this Plan.

The Government also acknowledges the continued support of international partners whose engagement has assisted the Maldives in strengthening its national response to trafficking in persons, including the International Organization for Migration, the United Nations Office on Drugs and Crime, the International Labour Organization; European Union, the Bali Process, and other bilateral and multilateral partners supporting capacity-building, technical cooperation, and regional coordination efforts.

The Government expresses its sincere appreciation and gratitude to all those who contributed to the preparation of this Plan.

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Acronyms and Abbreviations

ACC	Anti-Corruption Commission
AGO	Attorney General's Office
ATO	Anti-Trafficking in Persons Office
CSO	Civil Society Organisation
DOFL	Department of Foreign Labour
FIU	Financial Intelligence Unit
HRCM	Human Rights Commission of the Maldives
HTPA	Human Trafficking Prevention Act (Law No. 12/2013, as amended)
JICA	Japan International Cooperation Agency
ILO	International Labor Organization
IOM	International Organization for Migration
LGA	Local Government Authority
LMIS	Labour Market Information System
LRA	Labour Relations Authority
MATI	Maldives Association of Tourism Industry
MNCCI	Maldives National Chamber of Commerce and Industry
MDS	Maldives Digital Services
MI	Maldives Immigration
MoEDTT	Ministry of Economic Development, Transport and Trade
MoFA	Ministry of Foreign Affairs
MoHSLT	Ministry of Homeland Security, Labour and Technology
MoIAE	Ministry of Islamic Affairs and Endowments
MoHFW	Ministry of Health, Family and Welfare
MoTCA	Ministry of Tourism and Civil Aviation
MPS	Maldives Police Service
MWRC	Migrant Workers Resource Centre
NAHTCC	National Anti-Human Trafficking Coordination Committee
NGO	Non-Governmental Organisation
NRM	National Referral Mechanism
OHCHR	Office of the United Nations High Commissioner for Human Rights
OSH	Occupational Safety and Health
OWG	Operational Working Group
PGO	Prosecutor General's Office
RACI	Responsible, Accountable, Consulted, Informed (Framework)
SAILs	Sustainable and Integrated Labor Services
SOP	Standard Operating Procedure
TIP	Trafficking in Persons
TOT	Training of Trainers
UNODC	United Nations Office on Drugs and Crime

1. Executive Summary

The Maldives Anti-Human Trafficking Strategic Plan 2026–2028 (the Plan) is a three-year, results-based instrument for combatting trafficking in persons in the Republic of Maldives. It is issued under the Human Trafficking Prevention Act (Law No. 12/2013) and runs on an annual May-to-April cycle aligned to that statutory requirement.

The Plan establishes the Maldives’ counter-trafficking strategy across five operational pillars and one cross-cutting pillar—Governance and Legal Reform; Prevention, Awareness and Demand Reduction; Deterrence, Detection, Investigation and Prosecution; Victim-Centred Protection; Cooperation and Partnerships; and a cross-cutting pillar on Data, Monitoring, Evaluation and Accountability. Each pillar carries a strategic objective, a log frame specifying outcomes, outputs and indicators, a costed implementation matrix with named lead agencies, and annual milestones for each of the three plan years.

The Plan responds to five concurrent realities:

- International benchmarking: The 2025 United States Trafficking in Persons Report retained the Maldives on the Tier 2 Watch List for a second consecutive year.
- Institutional consolidation: Labour and homeland-security functions consolidated under the Ministry in April 2026.
- Operation Kurangi outcomes: Substantial closure of long-standing governance gaps in foreign-worker registration and biometric coverage.
- Evolving global threat: Cyber-enabled trafficking, including scam-compound exploitation across Southeast Asia, with forward-looking implications for the Maldives.
- Statutory and stakeholder findings: The 2025 National Conference identified an uneven awareness of the Human Trafficking Prevention Act among certain categories of stakeholder—a finding that this Plan addresses directly through educational content on the law and the response mechanism.

Part I

Context and Rationale

Why this Plan, why now, and
what the evidence tells us

2. Statutory Mandate and Plan Architecture

The Human Trafficking Prevention Act (Law No. 12/2013, as amended) establishes the National Anti-Human Trafficking Coordination Committee and confers upon it the duty to develop the national plan for combatting trafficking in persons. The Act envisages that the plan is issued on an annual cycle and reported on annually to the People’s Majlis. On behalf of the Committee, its Secretariat – the Anti-Trafficking in Persons Office (ATO) – took the role of data collection and drafting the Plan.

Two of the above said obligations had, prior to this Administration, never been operationalised. The first National Action Plan under the Act was issued in March 2025. The first statutory annual report on national anti-trafficking efforts was submitted to the People’s Majlis in July 2025. This Strategic Plan 2026–2029 represents the second cycle of the annual planning requirement under the Act, adopting a three-year horizon with annual milestones in order to deliver continuity of institutional change while respecting the annual cycle the Act requires.

The plan cycle under the Act runs from May of each year to April of the year following. The 2025 Plan, issued in April 2025, ran through the calendar year 2025. This Plan confirms the planning cycle to a regular May-to-April rhythm for the remainder of this Administration’s term and beyond.

Annual Cycle

Year 1	1 May 2026 – 30 April 2027
Year 2	1 May 2027 – 30 April 2028
Year 3	1 May 2028 – 30 April 2029

Annual report to the People’s Majlis:

July of each plan year, covering the preceding May-to-April cycle

Plan revision and re-issuance:

May of each plan year, drawing on the previous year’s annual milestone review

The Plan is structured as a single three-year strategic plan with annual milestones in each of the three plan years, rather than as three separately developed annual plans. This architecture has been adopted for two reasons. First, the development and approval of a fresh annual plan from first principles each year consumes a disproportionate share of the very limited specialist capacity available at the ATO and the Committee. The three-year plan releases that capacity for the implementation of activities rather than the writing of fresh plans. Second, a number of the most important reforms under this Plan—including legal-framework review, the operationalisation of a National Referral Mechanism, the completion of the national baseline study on trafficking, the build of the Labour Market Information System, and the establishment of permanent victim support arrangements—cannot be designed or delivered within a single annual cycle. Without the multi-year horizon, the most important changes will not be made.

The annual statutory obligation is fulfilled in three ways: through the May-to-April annual milestones in each pillar’s logframe; through the annual milestone review conducted by the NAHTCC at the close of each plan year; and through the annual report submitted to the People’s Majlis in July of each year.

3. Definitions, Legal Framework and the National Response Mechanism

This chapter is included in the Plan as a foundational reference. The 2025 National Conference and the stakeholder presentations to the NAHTCC in the second quarter of 2025 made clear that awareness of the Human Trafficking Prevention Act, its definitions, the related legal framework and the response mechanism remain uneven among many actors with a direct role in the offence—including parts of the private sector, local authorities on outer islands, and segments of the legal community. The Plan therefore considers it important to reproduce the core definitions, depict the constellation of relevant laws, and explain plainly how a person at risk of trafficking moves through the national response.

3.1 Why these definitions matter

The recognition of trafficking does not begin with arrest; it begins with the recognition of an indicator by a frontline actor—a labour inspector, a police officer, an immigration officer, an island council representative, a community health worker, a guesthouse operator, a recruitment-agency manager, or simply a neighbour. Recognition begins with shared language. The first call on this Plan, therefore, is the dissemination of these definitions among every category of stakeholder.

3.2 Legal Definitions

Trafficking in persons

Under the Human Trafficking Prevention Act, trafficking in persons consists of three elements: an **act** (recruiting, transporting, transferring, harbouring or receiving a person); carried out by a **means** (threat or use of force, coercion, abduction, fraud, deception, the abuse of power or of a position of vulnerability, or the giving or receiving of payments or benefits to obtain control of another person); for the **purpose of exploitation**. Where the victim is a child, the means element is not required. The verbatim statutory text shall be reproduced from Section 17 and the surrounding provisions of the Act in the official Dhivehi-language publication of this Plan.

Exploitation

The Human Trafficking Prevention Act defines exploitation to include, at a minimum: forced labour or services; slavery and practices similar to slavery; servitude; debt bondage; sexual exploitation, including the **exploitation** of the prostitution of others; forced or coerced criminal activity; and the removal of organs. The Act addresses each form whether occurring within the Republic, in transit through the Republic, or in cases involving Maldivian nationals exploited abroad.

Debt bondage

Debt bondage is the status arising from the pledging of personal services as security for a debt where the reasonable value of those services is not applied towards the liquidation of the debt, or where the duration and nature of those services are not respectively limited and defined. Recruitment-fee debt, the retention of identity documents to enforce repayment of advances or recruitment costs, and the deduction of wages towards an open-ended debt all fall within this concept.

Forced labour

Forced labour is all work or service exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily. The retention of identity documents, the withholding of wages, restriction of movement, threats of denunciation to authorities, abusive working and living conditions, and excessive overtime are recognised indicators of forced labour under ILO standards reflected in the Human Trafficking Prevention Act.

Coercion

Coercion includes threats of serious harm to, or physical restraint against, any person; any scheme, plan or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or the abuse or threatened abuse of legal process. Coercion may be psychological as well as physical, and may be exercised against the family members or community of the person being coerced.

Child trafficking

Child trafficking occurs where any of the listed acts (recruiting, transporting, transferring, harbouring or receiving) is undertaken in respect of a person under the age of eighteen for the purpose of exploitation. The means element (force, deception, coercion and the other listed means) is **not required** for a finding of child trafficking under the Human Trafficking Prevention Act, in alignment with the 2000 UN Trafficking in Persons Protocol and the Convention on the Rights of the Child.

3.3 Relevant Laws

Trafficking in persons falls within a framework of interconnected laws. The Human Trafficking Prevention Act is the anchor instrument. The laws below operate together to address the criminality, the victim's rights, the labour-market conditions in which trafficking thrives, the protection of children, the oversight of officials, the workplace safety conditions of foreign workers, and the financial flows that fund organised exploitation.

Anchor Law	Human Trafficking Prevention Act
Supported Laws For the Offence	Penal Code, Criminal Procedure Code, Employment Act, Child Rights Protection Act, Domestic Violence Act, Evidence Act
Relevant Laws Enforcing Agency	Maldives Immigration Act, Human Rights Commission Act, Occupational Health and Safety Act.

3.3.1 Role of Each Instrument

Law	Role in the counter-trafficking response
Human Trafficking Prevention Act (Law No. 12/2013, as amended)	Anchor instrument: defines the offence of trafficking; establishes the NAHTCC; mandates victim protection under Section 35; sets penalties; provides for victim-witness protective measures; establishes the basis for the annual national plan and the annual report to the People's Majlis
Penal Code	Offences against persons including abduction, unlawful restraint, threats, sexual offences, fraud, conspiracy, criminal facilitation, and offences relating to public officials; provisions on jurisdiction and complicity; aggravating factors
Child Rights Protection Act	Best-interests principle; protective measures for children; obligations on State actors and on persons in positions of responsibility towards children; child-specific procedural safeguards
Employment Act (as amended by Law No. 10/2024)	Labour rights of Maldivian and foreign workers, including timely payment of wages and provision of essential services; basis for LRA inspections and complaints; Employment Tribunal jurisdiction
Occupational Safety and Health Act	Workplace safety conditions for foreign workers, which when neglected may give rise to trafficking-indicator patterns
Maldives Immigration Act	Conditions of stay, work permits, border control, removal procedures, and the special visa for trafficking victims under the Human Trafficking Prevention Act
Human Rights Commission Act	Independent oversight; investigation of complaints relating to State conduct; reporting to the Majlis and to international bodies
Anti-Money Laundering and Counter-Terrorism Financing Act	Suspicious-transaction reporting, financial-intelligence cooperation, asset tracing and confiscation against trafficking-related illicit financial flows
Domestic Violence Prevention Act	Protection orders and survivor-support measures where exploitation occurs within the household, including for migrant domestic workers
Witness Protection arrangements and procedural laws	Confidentiality of victim identity; closed proceedings; use of pseudonyms; admission of pre-trial statements; restrictions on irrelevant cross-examination—all available under the Human Trafficking Prevention Act, supported by procedural laws
Employment Agency Regulation (2023) and subsidiary instruments	Categorisation of recruitment-agency licences; security deposits; prohibition on charging recruitment fees to workers; basis for licence sanctions

3.4 National Response Mechanism

The Plan reproduces the response mechanism in plain terms because frontline actors, employers, civil society and members of the public should know how to act when they encounter a trafficking indicator. The mechanism comprises five stages: recognition, referral, screening and identification, protection, and investigation and prosecution.

3.4.1 Recognition

Recognition is the work of any person who encounters a possible indicator. Indicators include: retention of a worker's passport or identity documents; non-payment or delayed payment of wages; sudden onset of restricted movement; recruitment under terms that do not match the job description; fraudulent recruitment fees; signs of physical harm; unexplained injuries; a worker who appears not to control their own communications, documents or earnings; tourist or work visas used for purposes inconsistent with their issuance; and minors in circumstances where adults exercise undue control. Recognition does not require certainty; it requires only enough concern to refer.

3.4.2 Referral pathways

Any person may refer a suspected case. The following are the principal pathways:

- The Maldives Police Service (MPS) 24-hour hotline.
- The ATO hotline (and, on its expansion under this Plan, the Migrant Workers Resource Centre multilingual hotline).
- Maldives Immigration's Anti-Human Trafficking Unit.
- The Labour Relations Authority (LRA), for labour-exploitation indicators.
- The Foreign Labour Department (DOFL), for foreign-worker related matters.
- The Migrant Workers Resource Centre and its Migrant Connect Portal.
- The Human Rights Commission of the Maldives, for matters involving alleged State conduct or systemic concerns.
- The Island Council in the locality where the indicator is encountered.
- Civil society organisations partnered with the ATO, including the Maldives Red Crescent.
- Any healthcare professional, who may refer through the Ministry of Health.

On receipt of a referral, the receiving agency notifies the ATO and the Maldives Police Service, which proceed to screening.

3.4.3 Screening and Identification

Screening is conducted in two stages. A Preliminary Screening Tool, developed by the OWG and piloted under Operation Kurangi, supports frontline officers in identifying early indicators. Where preliminary screening surfaces credible indicators, the MPS conducts a comprehensive screening under the Human Trafficking Prevention Act and the Victim Identification Guidelines, supported by the ATO. Identification is formally declared by the MPS under the Act. Where the indicators do not meet the threshold for trafficking but disclose exploitation under another statute, the matter is referred onward to the LRA, the Employment Tribunal or another competent body as appropriate.

3.4.4 Protection

Section 35 of the Human Trafficking Prevention Act mandates the ATO to ensure that victims of human trafficking receive comprehensive services without discrimination, including shelter, healthcare, counselling, legal aid and interpretation. Section 48 mandates Maldives Immigration to ensure a special visa enabling lawful stay during the legal and support process for foreign nationals. Section 58 establishes the right of victims to claim compensation. A 90-day reflection period applies, during which a victim is not required to decide whether to participate in criminal proceedings. Where required, gender-sensitive interview arrangements are made, including same-gender interviewing officers.

3.4.5 Investigation and prosecution

The MPS Anti-Human Trafficking Department investigates trafficking offences. Investigation and prosecution proceed in close coordination with the Prosecutor General's Office (PGO), where the Major Crimes Unit is responsible for handling trafficking and other serious offences under Section 22 of the Criminal Procedure Code. Victim-witness protections under the Act and procedural law apply throughout, including the closing of hearings, sealing of records, use of pseudonyms, restrictions on irrelevant cross-examination and the admission of pre-trial statements. Where an investigation leads to conviction, the prosecution may apply for restitution under the Act; the ATO additionally provides legal aid for civil compensation claims.

3.4.6 A diagram of the response mechanism

Stage	Action
Stage 1 — Recognition	Anyone—public, employer, council, NGO, official—recognises a possible indicator and acts to refer
Stage 2 — Referral	Through any of the pathways listed in section 3.4.2; receiving agency notifies the ATO and MPS
Stage 3 — Screening	Preliminary Screening Tool applied; comprehensive screening by MPS under HTPA and Victim Identification Guidelines
Stage 4 — Identification	MPS formally declares the person a victim under the Act, or refers the matter onward where the threshold is not met
Stage 5 — Protection	ATO mandates services under Section 35: shelter, healthcare, counselling, legal aid, interpretation, special visa; 90-day reflection period; gender-sensitive interviews
Stage 6 — Investigation	MPS Anti-Human Trafficking Department investigates, with PGO Major Crimes Unit coordination
Stage 7 — Prosecution	PGO prosecutes; Section 35 procedural protections apply; restitution may be sought
Stage 8 — Reintegration	Voluntary repatriation where requested; livelihood, psychosocial, educational support for those remaining in the Maldives or returning to source countries



4. The Trafficking Landscape in the Maldives

4.1 Demographic and structural risk factors

The Republic of Maldives is a labour-receiving, tourism-dependent and geographically dispersed Small Island Developing State. A population of approximately 416,000 Maldivian nationals are served by a foreign workforce in the order of approximately 233,000, of whom credible estimates suggest a meaningful proportion have, until recently, lacked complete registration within State systems. The principal sending countries are, in order of volume, Bangladesh, India, Sri Lanka, Nepal, the Philippines and Thailand.

The risk environment is shaped by four structural features. First, the geographic dispersion of the State across 187 inhabited islands and approximately 162 resort-leased uninhabited islands create inspection blind-spots, particularly on resort properties and aboard live-aboard tourism vessels. Second, the labour market's reliance on low-skilled foreign workers in construction, fisheries, hospitality and domestic service exposes those workers to exploitative recruitment, document confiscation and wage-related coercion. Third, the tourism economy presents distinct risks of extraterritorial sexual exploitation. Fourth, the proximity of the Republic to Indian Ocean migration corridors places the Maldives within ecosystems whose risks must be actively managed. The integrity of the Maldives' growing cyber space presents a fifth, newer risk, addressed separately in Chapter 6.

4.2 Unregulated Migrant Labour: A National Security Concern

The Maldives National Security Policy of 2012 identified unregulated migrant labour as a strategic national security concern more than a decade ago. Where states permit large numbers of undocumented or weakly documented individuals to remain outside regulatory visibility, they create operating space for organised criminal networks, document fraud, trafficking facilitators and systems of exploitation. The April 2026 consolidation of labour and homeland-security functions under a single ministerial portfolio gives definitive operational effect to that strategic recognition.

When the present Administration assumed office in November 2023, it inherited a foreign-worker registration ecosystem in which the Maldives possessed materially incomplete visibility over the population of foreign workers in the Maldives. This lack of visibility limited the Government's ability to accurately regulate labour migration, monitor compliance, and identify conditions associated with trafficking in persons and labour exploitation. Through Operation Kurangi and the broader foreign worker regularisation programme, this visibility has been substantially restored. Between November 2023 and 1 May 2026, significant progress was achieved across all principal indicators relating to the registration and verification of foreign workers. At the commencement of the current Administration, the number of unverified work permits stood at 86,741. By 1 May 2026, this figure had been reduced to 19,904 — representing a decrease of approximately 77 per cent. During the same period, the number of verified active work permits increased from 208,937 to 212,980, reflecting a strengthened verification and monitoring framework. The number of valid work permits increased substantially from 60,520 in November 2023 to 152,634 by 1 May 2026, while invalid work permits declined significantly from 235,158 to 80,250. These figures indicate a major improvement in the integrity and accuracy of the national foreign worker registration system.

Most notably, biometric registration coverage expanded dramatically during this period. In November 2023, only 27,200 foreign workers had biometric (fingerprint) records within State systems, while 181,737 foreign workers remained outside biometric registration frameworks. By 1 May 2026, the number of foreign workers with biometric records had increased to 202,224, while the number without biometric records had declined to 10,756. This represents an increase in biometric coverage from approximately 13 per cent at the close of 2023 to approximately 95 per cent by 1 May 2026. Together with the reduction in unverified work permits, these measures have substantially closed a long-standing visibility gap that, for more than a decade, created operational space for trafficking facilitators, exploitative employers, and irregular labour practices.

Of the 10,756 foreign workers who remained without biometric records as at 1 May 2026, a meaningful proportion comprises individuals who are believed to have either departed the Maldives or are deceased. The reconciliation of this residual cohort remains ongoing under Phase Three of Operation Kurangi, which commenced on 3 May 2026 and involves systematic island-by-island enforcement and verification operations. Among foreign nationals holding verified work permits whose biometric records remain outstanding, 4,040 individuals are currently recorded. Immigration records indicate that 3,967 of these individuals remain physically present within the Maldives. The identification and biometric reconciliation of this remaining cohort continues as part of the Government's broader regularisation and counter-trafficking strategy.

5. Exploitation Patterns

The patterns set out below are those identified through inspection, complaint and screening data held by the Maldives Police Service, Maldives Immigration, the Labour Relations Authority, the DOFL, the Ministry of Health, Family and Welfare, the Human Rights Commission of the Maldives, and the ATO during 2024 and 2025. They are described as exploitation patterns or worker-related offences rather than as confirmed trafficking findings, in recognition of the rigorous threshold for formal trafficking identification under the Human Trafficking Prevention Act.

5.1 Worker-related offences and exploitation indicators

Category	Pattern observed in 2024-2025
Retention of passports or identity documents	Recorded as the most common indicator in MPS data for 2025 (10 cases). LRA closed 30 cases involving passport or document confiscation, all involving expatriate workers.
Fraudulent recruitment	Recorded in MPS data (5 cases in 2025), with patterns including misrepresentation of work conditions and recruitment-fee debt.
Wage theft and non-payment of salaries	The single largest category of complaint. The LRA recorded 422 wage-theft and salary non-payment complaints in 2025, of which 81 remained open (13 involving Maldivian workers, 68 involving expatriates) and 341 closed (31 Maldivian, 310 expatriate).
Unlawful restraint	Recorded in MPS data (5 cases in 2025).
Employer negligence	LRA closed 22 cases involving employer negligence, including failure to renew visas, lack of medical support, poor housing conditions and abandonment.
Repatriation-related grievances	MPS recorded 3 cases in 2025. Maldives Immigration voluntarily repatriated over 5,700 migrant workers between March 2024 and September 2025 at the workers' own request.
Prostitution and commercial sex misuse of visas	Observed misuse of tourist and work visas (including in spas, guesthouses, and as escorts) for engagement in prostitution; instances of persons posing as married couples to facilitate exploitation.
Forced or unpaid sexual services	Observed pattern of migrant workers (predominantly women) brought from Southeast Asian countries under the guise of professional massage therapy and subjected to forced or unpaid sexual services.
Physical or mental abuse	Limited recorded cases, with HRCM noting one such case among ten migrant-related investigations between April and November 2025.
Internal trafficking vulnerability	Children placed with extended or wealthier families on outer islands for educational purposes constitute a recognised internal-vulnerability category, although direct exploitation patterns have not been confirmed in significant volume during the reporting period.

5.2 Awareness of the Act as a stakeholder constraint

A significant finding of the 2025 National Conference, and of stakeholder presentations to the NAHTCC during the second quarter of 2025, was that awareness of the Human Trafficking Prevention Act among certain categories of stakeholders—including parts of the private sector, smaller employers, local authorities on outer islands, and segments of the legal community—remains uneven. The detection of exploitation indicators depends not only on screening tools but on the prior recognition by stakeholders that the conduct in question is the subject of a specific legal regime. The Plan addresses this gap directly under Pillar 2 and through Chapter 3 of this document, which reproduces the core legal definitions and the response mechanism for direct dissemination.

6. Changing Global Modus Operandi and Implications

Why this matters

Across Southeast Asia, the rapid expansion of industrial-scale scam compounds—documented by the Office of the United Nations High Commissioner for Human Rights in its February 2026 report *A Wicked Problem*—has trafficked an estimated three hundred thousand workers from sixty-six countries, including from each of the Maldives’ principal labour-source countries: Bangladesh, India and Sri Lanka. The implications of this for the Maldives are forward-looking rather than retrospective: no Maldivian national has yet been confirmed as a victim of this form of trafficking. But the possibility cannot be ignored, and the responsibility to prevent the misuse of the Maldives’ growing cyber and financial infrastructure is acute.

6.1 The phenomenon in summary

Organised cyber-enabled fraud operations across parts of the region are increasingly exploiting individuals through deceptive recruitment schemes that promise legitimate employment opportunities abroad. Many victims are subsequently subjected to conditions amounting to forced labour, debt bondage, intimidation, and physical abuse, while being coerced into carrying out online fraud activities, including romance scams, investment fraud, impersonation, and extortion targeting victims internationally. Recruitment commonly occurs through fraudulent online advertisements and informal personal networks, making Maldivian jobseekers and migrant workers vulnerable to exploitation, particularly where awareness, verification mechanisms, and cross-border protections remain limited.

6.2 Implications for the Maldives

Implication 1

No confirmed Maldivian victims to date

There is no record at the time of this Plan of a Maldivian national having been confirmed as a victim of scam-compound trafficking abroad. This is consistent with the comparatively smaller pool of Maldivians seeking overseas low-skilled employment relative to comparator labour-source countries. Nonetheless, given the documented vulnerability of Maldivians to domestic financial fraud—including online investment schemes, romance frauds and Ponzi-style schemes—the possibility of recruitment of Maldivian nationals into scam-compound operations cannot be ignored.

Implication 2

Preventing the Maldives from becoming an enabler

Of equal or greater concern is the responsibility to ensure that the Maldives' growing cyber and financial infrastructure is not used to facilitate scam-compound operations elsewhere, whether through underground banking and informal value transfer, through the abuse of company registration to host shell entities, through the misuse of telecommunications infrastructure or satellite-based connectivity, or through artificial intelligence services hosted from the Maldives' jurisdiction. The Plan therefore takes a preventive posture: to deny criminal networks the use of Maldivian cyberspace, payment rails and corporate vehicles even before such use materialises.

Implication 3

Foreign workers in the Maldives as a re-trafficking risk.

Bangladeshi, Sri Lankan and Indian workers within the Republic—particularly those who have lost regular employment or are in irregular status—may be vulnerable to onward recruitment into scam-compound operations. The Plan accordingly strengthens labour-inspection, exit-screening at the border, and outreach to vulnerable migrant communities.

Implication 4

Artificial intelligence as both vector and tool.

Artificial intelligence is increasingly used by traffickers to scale online recruitment, produce convincing fraudulent communications, and impersonate victims and authorities. It is equally available to the State for the analysis of large datasets—the very capability that the Labour Market Information System is being designed to deliver. The Plan commits the Maldives to a deliberate, ethics-informed adoption of artificial intelligence in counter-trafficking analysis, and to working with international partners on the integrity standards that artificial intelligence services hosted in or from the Maldives' jurisdiction must observe.

6.3 Engagement with the global response

The global response architecture into which the Maldives positions itself includes the new merged mandate of the United Nations Human Rights Council Special Rapporteur on contemporary forms of slavery and trafficking in persons (Resolution L.8/Rev.1, October 2025); the UNODC #TrappedInScamCrime regional campaign; the Bangkok Global Partnership Against Online Scams and the Vienna Global Fraud Summit; and the Bali Process Working Group on Trafficking in Persons. Active engagement is reflected in Pillar 5.

7. National Security Implications

Trafficking in persons and the unregulated migrant labour ecosystem that enables it are not merely matters of criminal justice or labour administration. They produce concrete national security consequences across three domains: public health, the economy, and social cohesion. The Plan therefore situates counter-trafficking as part of the State's broader security architecture—and not as an isolated administrative function—drawing on the recognition first made in the Maldives National Security Policy of 2012.

7.1 Health security

A “shadow” population that remains outside State visibility—workers without verified registration, victims of trafficking held in concealed conditions, or undocumented persons living in cramped accommodation—produces predictable health security consequences. Such populations live with limited or no access to routine and emergency healthcare; they lack the coverage of health insurance arrangements available to legally documented residents; and their living and working environments are often unsuitable for hygienic basic functioning. The consequence is the formation of public-health “blind spots” within which infectious diseases—including tuberculosis, hepatitis, HIV and seasonal respiratory infections—may spread undetected by the State's surveillance apparatus, with later consequences for the wider population. The Plan addresses this dimension through the integration of healthcare access into victim protection (Pillar 4), through Island Council and Ministry of Health engagement on outreach (Pillars 2 and 4), and through the labour-inspection regime's attention to housing and working conditions (Pillar 3).

7.2 Economic security

Trafficking and the broader informal labour economy that surrounds it weaken the fiscal capacity of the State. Undocumented and exploitative employment generates wages and revenues outside the tax base; recruitment-fee debt and trafficking-related illicit financial flows move funds outside the regulated financial system; and the absence of social security contributions deprives the State of long-term obligations that should accompany labour-market participation. Beyond fiscal consequences, the perception that exploitative employment confers competitive advantage discourages compliant businesses, distorts sectoral economics, and undermines the integrity of public procurement where blacklisted entities may attempt to participate. The Plan addresses this dimension



through the inspection regime, the ethical recruitment regime, the FIU's financial-investigation capability, the Labour Market Information System's analytics, and through the existing arrangement under which the Ministry of Economic Development, Transport and Trade (MoEDTT) blacklists implicated entities.

The MoEDTT further recognises an illicit segment of the economy in which foreign nationals operate businesses through Maldivian nationals acting as fronts, while holding the necessary permits. Under Phase Three of Operation Kurangi, the MoEDTT is working to identify such firms and to assess whether they are involved in the exploitation of their workers, whether Maldivian or foreign, and whether they are implicated in human trafficking.



7.3 Social security and social harmony

The third dimension is the social contract itself. Where citizens and lawful residents observe that the law applies unevenly—most stringently to those with the least power, least stringently to actors with influence or wealth—faith in State institutions corrodes. The integrity of the response to trafficking is therefore a matter of social cohesion, not only of justice. The Plan addresses this dimension through the integrity framework (Code of Conduct, whistleblower protocol and the proposed feasibility study on an independent oversight body for trafficking-related matters), through transparent annual reporting to the People's Majlis under Section 65 of the Act, and through the visible application of inspection and prosecution to actors regardless of standing.

7.4 The whole-of-government implication

These three dimensions reinforce one another. A health-security “blind spot” becomes an economic-security cost when communicable disease disrupts the workforce. An economic-security loss becomes a social-cohesion loss when public anger turns on visible foreign-worker communities rather than on the regulatory failure that produced the conditions. A social-cohesion loss becomes a health-security loss when public health authorities lose the trust of communities they need to serve. The Plan is therefore explicitly designed as a whole-of-government instrument, with local councils, the Ministry of Health, Family and Welfare, the MoEDTT, and the Financial Intelligence Unit (FIU) treated as substantive partners alongside the enforcement, prosecution and labour-administration agencies.

8. Where We Stand: Current State and Achievements

This Plan is grounded in a candid and evidence-based assessment of the Maldives' current position at the time of its issuance. It draws on and consolidates multiple sources of evidence and stakeholder input, including the Interim Submission for the Trafficking in Persons Report 2026 (3 December 2025), the responses to the 2025 TIP Report Questionnaire, the deliberations of the 2025 National Conference, stakeholder presentations made to the NAHTCC during the last quarter of 2025, and the findings of the Operational Working Group. Together, these sources offer a comprehensive, cross-institutional understanding of national efforts, operational realities, and systemic gaps in addressing trafficking in persons in the Maldives.

Across these inputs, there is a clear convergence around a set of key findings. On the one hand, they reflect meaningful progress in strengthening institutional frameworks, including the reconstitution of the NAHTCC, the implementation of the National Anti-Human Trafficking Action Plan 2025, expanded oversight of migrant labour systems, and increased emphasis on inter-agency coordination and capacity building. At the same time, the same processes—particularly the National Conference deliberations and stakeholder engagements—highlight persistent operational challenges. These include the need to further clarify institutional roles and responsibilities, strengthen documentation and information-sharing practices, improve frontline identification of trafficking indicators, and address capacity constraints across enforcement, regulatory, and social service agencies.

The findings of the Operational Working Group and the NAHTCC stakeholder consultations reinforce these conclusions, pointing to deeper, systemic constraints that continue to affect implementation. These include gaps in victim identification, limitations in investigative and case-development processes, weaknesses in inter-agency coordination and data management, and shortages in specialized skills and resources. While initiatives such as the development and

piloting of a preliminary trafficking screening tool demonstrate tangible progress toward improving early detection and referral consistency, they also underscore the need for further refinement and institutionalization. Overall, the combined evidence indicates that, while important foundations have been established, sustained and targeted efforts are required to address operational bottlenecks and to advance a more effective, coordinated, and victim-centred national response to trafficking in persons.

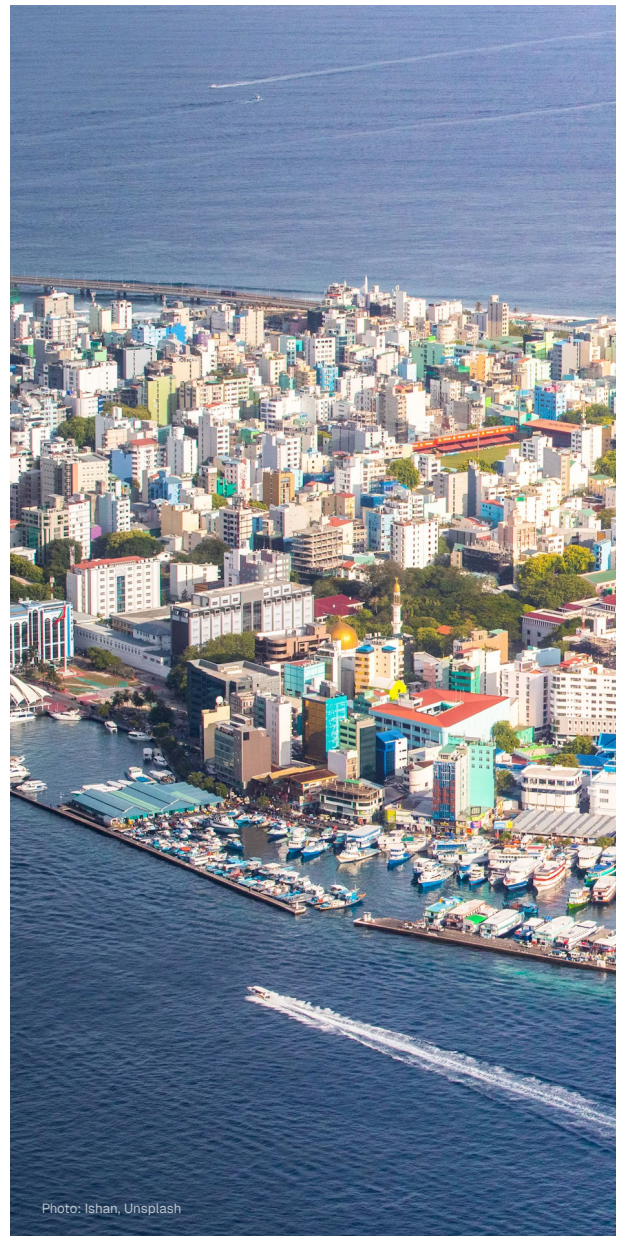


Photo: Ishan, Unsplash

8.1 Institutional foundations laid

Foundation	Status as at May 2026
NAHTCC reconstitution	Reconstituted in 2025 with new membership criteria requiring policymaking-level representation. Chaired by the MoHSLT.
First National Action Plan under the Act	Issued March 2025 (Action Plan 2025).
First annual statutory report to the People's Majlis	Submitted July 2025 — the first such report since the enactment of the Act in 2013.
Operational Working Group	Inaugurated 14 July 2025; functioning as the multi-agency operational coordination body under the Committee.
Preliminary Screening Tool	Developed by the OWG; piloted during Operation Kurangi; revised by the ATO; trial phase ongoing pending validation with end-users.
Migrant Workers Resource Centre (MWRC)	Established June 2025 as a one-stop support hub for migrant workers facing exploitation, rights violations or abuse.
Migrant Connect Portal	Online grievance mechanism launched; complaints processed by the MWRC and referred to relevant authorities.
Operation Kurangi—biometric and work-permit regularisation	Over 200,000 biometric records collected since May 2024. By December 2025: 154,406 active work permits and 137,010 invalid permits identified. Biometric coverage of foreign workers improved from approximately 13 per cent at the end of 2023 to approximately 95 per cent.
Phase Three of Operation Kurangi	Commenced 3 May 2026 — systematic island-by-island enforcement to identify undocumented foreign nationals.
Hotlines	ATO hotline 8.00 am – 2.00 pm; MPS hotline 24 hours. Immediate assistance in Dhivehi and English, with interpreters engaged where required.
Temporary shelter	A temporary shelter is available at K. Himmafushi, supplemented by guesthouse accommodation to ensure flexible and safe placement of victims.
Employment Act amendment (Law No. 10/2024)	Ratified 1 September 2024; modifies Section 65 to strengthen obligations of employers towards expatriate workers, including timely payment of wages and provision of essential services.

8.2 Shortfalls

Alongside these foundations, the following gaps are acknowledged and form the principal targets of action under this Plan:

- Formal trafficking victim identifications and convictions remain at zero across the most recent reporting periods. This is reflective of identification, investigation and prosecution thresholds rather than the absence of exploitation.
- A national baseline study on trafficking in persons has been under development for the last two years and remains incomplete. Its completion is a Year 1 priority under this Plan.
- The ATO remains a small office relative to the scope of its statutory mandate. The Plan addresses this through the operationalisation of the OWG as a force multiplier, alongside strengthened Ministry’s monitoring, enhanced Situational Awareness and Joint Assessments team. In parallel, the integration of artificial intelligence within the Labour Market Information System (LMIS) will support the provision of timely, consolidated data required by the ATO, rather than relying on a large expansion of the Office itself
- A centralised national trafficking data platform does not yet exist. The LMIS is being designed as the digital backbone of integrated labour governance and will, in time, support Ministry monitoring, situational awareness, and joint assessments, while providing the data necessary for the ATO to undertake evidence-based counter-trafficking analysis.
- A National Referral Mechanism is not yet adopted. The Plan provides for its design and adoption in Year 1.
- Awareness of the Human Trafficking Prevention Act among certain categories of stakeholders—including parts of the private sector, smaller employers, local authorities on outer islands and segments of the legal community—remains uneven, as identified at the 2025 National Conference.
- The application of the non-punishment principle for trafficking victims, particularly in relation to offences such as immigration violations or coerced criminal activity, has not been the subject of a structured legal assessment within the Maldivian context. The Plan provides for such an assessment in Year 1.
- Inter-agency coordination challenges within the Maldives’ own anti-trafficking response—including most recently a divergence in February 2026 over the LRA’s contribution to TIP reporting, and concerns over the absence of systematic trafficking screening during immigration enforcement operations prior to deportation—must be resolved through policy direction under this Plan.

8.3 What the data tells us

Inter-agency case data for 2024 and 2025 illustrates substantial volume of labour-exploitation indicators alongside the absence of formal trafficking identifications under the threshold of the Act. The MPS Anti-Human Trafficking Department screened 38 persons in 2024 and 30 in 2025 for trafficking indicators, opening 30 files and logging 26 cases in 2024 (forwarding five to the PGO), and opening 8 files and logging 22 cases in 2025 (forwarding eight to the PGO). Maldives Immigration screened 68 persons across the two years, processed 92 files and logged 75 cases, referring 13 to the PGO. The HRCM investigated 10 migrant-related cases between April and November 2025. The MoHFW resolved 13 exploitation-linked cases in 2025. The MWRC has been receiving and referring grievances. The principal indicators across the two years are passport confiscation, wage theft, employer negligence and fraudulent recruitment—patterns that are internationally recognised as forced-labour and trafficking indicators.

8.4 Capacity-building delivered in 2025

During 2025, MPS trained 66 officers on trafficking investigations and victim identification; MI trained 65 officers on trafficking identification; the LRA, DOFL and ATO sent officers to Bali Process and other regional and bilateral capacity-building programmes; and a joint multi-agency Human Trafficking Awareness Workshop, a Media Sensitisation Awareness Session, and several training events under JICA, UNODC and IOM sponsorship were delivered. Cyber-security scamming and its relevance to human trafficking was specifically covered.

8.5 The 2025 National Conference

The National Conference “Redefining Responsibilities in Combatting Human Trafficking in the Maldives” was held in Malé on 22–23 July 2025, convening 19 government agencies responsible for combatting human trafficking, four law enforcement institutions, six non-governmental organisations, two private-sector entities and three international organisations. Discussions centred on clarifying operational roles among agencies, improving documentation and information sharing, strengthening frontline identification of exploitation indicators and raising awareness of obligations under the Human Trafficking Prevention Act. Consensus emerged on six priority themes—information management, capacity-building, expansion of victim-support services, transparent screening and victim-witness protection arrangements, inter-agency coordination, and media sensitisation and hotline awareness—and on the unevenness of awareness of the Act among certain stakeholder categories. These conference outcomes have shaped the strategic emphasis and the prioritisation of activities under this Plan.

9. Formulation of this Plan

This Plan has been developed through a deliberate, sequential and consultative process. The process is recorded transparently here because the credibility of the Plan rests in part on the rigour with which its content was derived.

9.1 Stage 1: Capturing Expectations and Inputs at the National Conference

The first stage of data collection was the National Conference “Redefining Responsibilities in Combatting Human Trafficking in the Maldives”, held on 22–23 July 2025. The Conference brought together 19 government agencies, four law enforcement institutions, six non-governmental organisations, two private-sector entities and three international organisations. The Conference captured participants’ expectations of the national counter-trafficking response, identified institutional inputs from each represented body, and secured consensus on six priority themes. A detailed conference report was compiled, and the findings have been used to inform the strategic emphasis of this Plan.

9.2 Stage 2: Stakeholder Presentations to the NAHTCC

The second stage was the structured presentation by each principal stakeholder institution of its anti-trafficking efforts, challenges and achievements to the NAHTCC during the last quarter of 2025. Presenting institutions included the Maldives Police Service, Maldives Immigration, the Labour Relations Authority, the Department of Foreign Labour, the Attorney General’s Office, the Office of the Prosecutor General, and the Ministry of Social and Family Development (merged with health portfolio in April 2026). The presentations were used to surface gaps that institutions themselves identified, to validate the inter-agency case data, and to test the realism of proposed initiatives.

9.3 Stage 3: Synthesising Reporting and the OWG Input

The third stage drew together information package compiled by relevant agencies to feed information to the TIP Report Questionnaire and the Interim Submission for the Trafficking in Persons Report 2026 (submitted on 3 December 2025), the validation of those submissions, and the operational input of the OWG whose specialist personnel are directly involved in screening, investigation and victim support. Together with the international reporting cycle, this stage consolidated the national data position and identified the gaps that the Plan must address.

9.4 Stage 4: Inputs to the First Draft

The Anti-Trafficking in Persons Office, drawing on stages 1–3, prepared a first draft of the Strategic Plan. The first draft was circulated to all stakeholder institutions and to other agencies with a role under the Human Trafficking Prevention Act for feedback. Feedback was collected, reviewed by the ATO, and incorporated into a revised draft. A special session of the NAHTCC was convened for the purpose of deliberating on the revised draft before endorsement. The endorsed version was presented to the MoHSLT and thereafter submitted to the President for approval and issuance under the Act.

Part II

Strategic Design

Theory of change and the pillar framework

10. Theory of Change

The Strategic Plan is anchored in an explicit theory of change linking inputs through activities and outputs to outcomes and impact. Each pillar's logframe in Part III inherits its logic from this overall structure.

Tier	Description
Inputs	Legal authority under the Human Trafficking Prevention Act; the ATO; specialist personnel across MPS, PGO, MI, LRA, DOFL, MoHFW; the OWG as a force multiplier; the LMIS and integrated AI analytics; State Budget allocations under a dedicated programme code; international technical support from IOM, UNODC, ILO, OHCHR and bilateral partners
Activities	The six pillars: governance and legal reform; prevention and awareness; deterrence, detection, investigation and prosecution; victim-centred protection; cooperation and partnership; data, monitoring and accountability
Outputs	Completed baseline study; adopted National Referral Mechanism; functioning specialist investigation and prosecution capability; multilingual hotline; permanent shelter operational; LMIS operational; cyber-trafficking working group active; sector codes signed; bilateral cooperation arrangements concluded; Island Councils engaged
Outcomes	Increased identification of trafficking victims; increased rate of investigations and prosecutions; improved survivor recovery and reintegration; reduced incidence of exploitative recruitment; improved compliance among employers and recruitment agencies; reduced re-trafficking risk; strengthened international cooperation; reduced misuse of the Maldives' cyber and financial infrastructure; improved health, economic and social-cohesion outcomes related to migrant labour
Impact	The Maldives in substantial compliance with international anti-trafficking standards; tangible reduction in trafficking incidence and severity; trafficking systematically deterred and prosecuted; victims protected with dignity; the integrity of State institutions visibly secured

10.1 Key assumptions

- That the institutional consolidation under MoHSLT achieves operational synergies rather than merely structural realignment.
- That recurrent State Budget allocations to the ATO and related functions are protected and progressively increase over the three-year period.
- That the LMIS will be implemented by the third quarter of 2027 under the World Bank-funded SAILS project, with integration into the necessary case-management systems.
- That the OWG is able to mobilise specialist personnel from contributing agencies at the required pace and quality.
- That sending-country governments continue to engage constructively in cooperation arrangements.
- That tourism-sector partners accept proactive monitoring as compatible with the protection of legitimate industry reputation.
- That the People's Majlis enacts the proposed amendments to the Human Trafficking Prevention Act within the Plan period.
- That Island Councils respond constructively to engagement as anti-trafficking partners across the atolls.
- That international technical partners maintain a stable level of programmatic support.

11. Strategic Framework: Pillars and Cross-Cutting Themes

The Plan is structured around five operational pillars and one cross-cutting pillar. The pillars are mutually reinforcing: prevention reduces inflow; identification and prosecution provide deterrence; victim-centred protection generates the witnesses, evidence and trust that successful prosecutions depend on; cooperation extends the Maldives' reach into source countries and transnational networks; and the cross-cutting pillar holds the entire architecture to account.

Pillar	Strategic objective
Governance, Legal Reform and Institutional Strengthening	Establish a coherent, adequately empowered counter-trafficking architecture, modernise the legal framework, operationalise the OWG fully, and establish trusted channels for confidential reporting
Prevention, Awareness and Demand Reduction	Reduce vulnerability through ethical recruitment, source-country-language awareness, the closure of HTPA awareness gaps, the engagement of Island Councils as anti-trafficking partners, demand-reduction work and private-sector partnership
Deterrence, Detection, Investigation and Prosecution	Convert credible indications of trafficking into investigations, prosecutions and convictions through specialised enforcement, financial intelligence and prosecutorial capacity, integrated border management, and proactive inspection across the atolls
Victim-Centred Protection, Assistance and Reintegration	Ensure that every person identified as a trafficking victim or presenting credible indicators receives prompt, safe and dignified protection, assistance and where applicable reintegration, informed by a structured study of the support model best suited to the Maldivian context
Cooperation, Partnerships and International Engagement	Extend the Maldives' counter-trafficking effort through bilateral, regional and multilateral cooperation, civil society partnership and private-sector engagement
Data, Monitoring, Evaluation and Accountability	Establish a unified data and accountability system anchored in the LMIS and the baseline study

11.1 Cross-cutting themes

- Gender-responsive and child-centred approach. All identification, protection, training and data-collection arrangements distinguish between, and respond appropriately to, the distinct experiences of women, men, girls and boys.
- Integrated labour governance as anti-trafficking infrastructure. Every pillar exploits the consolidation of homeland-security and labour functions under MoHSLT to deliver line-of-sight across the labour ecosystem.
- Cyber, AI and financial-flows lens. Every pillar accommodates the online recruitment dimension, the digital and AI evidence and tooling dimension, and the illicit financial flows dimension.
- Island-centred delivery. The Plan deliberately engages Island Councils, the principal local-government interface with citizens and resident foreign workers across the atolls, as substantive partners in awareness, identification and inspection.

Part III

The Strategic Pillars

Five operational pillars and one cross-cutting pillar,
each with a logframe and annual milestones

12. Pillar 1: Governance, Legal Reform and Institutional Strengthening

12.1 Strategic objective

Establish a coherent, adequately empowered counter-trafficking architecture; modernise the legal framework; fully operationalise the OWG as a force-multiplying delivery instrument; and establish trusted, confidential channels for reporting that complement formal pathways.

12.2 Logframe

Outcome	Strengthened NAHTCC oversight
Output	Standing order revised; expanded composition; quarterly meetings
Indicator	Meetings per year; PGO (observer) at the table
Baseline (2026)	Reconstituted 2025; PGO not full member
Y1 → Y3 milestones	Y1: PGO full member, HRCM and MoFA observer; ≥ 4 meetings/yr; Y2-3 sustained

Outcome	Operationalised OWG as force multiplier
Output	OWG fully operational with on-call specialist roster from contributing agencies
Indicator	% of OWG-mandated tasks delivered on time; specialist roster size
Baseline (2026)	Inaugural meeting 14 July 2025
Y1 → Y3 milestones	Y1: roster, working procedures, training; Y2: ≥ 70% on-time; Y3: ≥ 85%

Outcome	Modernised legal framework
Output	Consolidated amendment package; National Referral Mechanism
Indicator	Bill enacted; NRM adopted
Baseline (2026)	No amendment Bill; no NRM
Y1 → Y3 milestones	Y1: NRM adopted; legal audit completed; Y2: Bill enacted; Y3: implementation

Outcome	Non-punishment study completed
Output	Legal study with options for application in Maldivian context
Indicator	Study completed; policy direction adopted
Baseline (2026)	Not yet studied
Y1 → Y3 milestones	Y1: study completed; Y2: policy direction; Y3: implementation

Outcome	Baseline study completed
Output	National baseline study on trafficking
Indicator	Study published; data used in monitoring
Baseline (2026)	Under development for 2 years
Y1 → Y3 milestones	Y1: completed and published
Outcome	Integrity safeguards
Output	Code of Conduct, whistleblower protocol and NGO-managed confidential reporting channel
Indicator	Code adopted; reports received and processed
Baseline (2026)	Absent
Y1 → Y3 milestones	Y1: Code adopted; channel established; Y2-3: mature implementation
Outcome	Feasibility of independent oversight body assessed
Output	Feasibility study on a National Ombudsman/Commission with investigative powers in this domain
Indicator	Study completed; recommendations to NAHTCC
Baseline (2026)	Concept stage
Y1 → Y3 milestones	Y1: study completed; Y2: decision; Y3: any consequent legislation
Outcome	Island Council engagement formalised
Output	Formal arrangement with Island Councils as referral and awareness partners
Indicator	Councils engaged; SOPs adopted
Baseline (2026)	No formal arrangement
Y1 → Y3 milestones	Y1: arrangement; Y2: ≥ 50% engaged; Y3: full coverage

12.3 Implementation matrix

Initiative / activity	Three-year deliverable	Lead / supporting	Cost (MVR)	Years
NAHTCC composition and standing-order review	Revised standing order; PGO as full member; HRCM as observer; survivor participation	MoHSLT, NAHTCC, AGO	300,000	Y1
OWG operationalisation	OWG fully operational with on-call specialist roster from MPS, MI, LRA, DOFL, MoHFW; working procedures; training	MoHSLT, ATO, NAHTCC	200,000	Y1-Y3
Legal audit and amendment package	Audit; consolidated Bill addressing definitions, demand-side offences, victim-witness protection, asset confiscation, complicity, alignment with international instruments	AGO, ATO, MoHSLT	1,000,000	Y1-Y2
Non-punishment principle: legal assessment in Maldivian context	Legal study examining the scope and limits of applying the non-punishment principle (e.g. immigration violations, prostitution-related charges and coerced criminal activity) under Maldivian law	AGO, ATO, PGO, HRCM (consult)	500,000	Y1
National Referral Mechanism	NRM adopted by Cabinet; tools in priority languages; frontline training across atolls	ATO, MoHSLT, MoHFW, MPS, MI, LRA, DOFL, Island Councils	2,500,000	Y1-Y2
National baseline study	Completion and publication of the two-year baseline study; integration with monitoring framework	ATO, MoHSLT, research partners	700,000	Y1
Code of Conduct and whistleblower protocol	Adopted across enforcement and inspection agencies; independent referral channel	MoHSLT, ATO, ACC, HRCM (consult)	500,000	Y1
NGO-managed encrypted anonymous reporting channel	Operational confidential reporting channel managed by civil-society partners, complementing State hotlines and providing an alternative pathway for those who may fear official channels; technical security to international standards	ATO, MoHSLT, CSO partners	500,000	Y1-Y2
Feasibility study: independent oversight body for trafficking matters	Structured study on the legal, constitutional and institutional feasibility of establishing or designating a body with appropriate independence and investigative powers in respect of trafficking-related matters, including official complicity. Options to include an expanded mandate for an existing body (e.g. HRCM) or a dedicated Ombudsman/Commission	AGO, ATO, HRCM (consult), academic partners	500,000	Y1
Pre-deportation trafficking screening protocol	Mandatory minimum trafficking screening prior to deportation, particularly for women migrant workers; reconciliation of inter-agency divergence flagged in February 2026	MoHSLT, MI, ATO, MPS	400,000	Y1
Formal arrangement with Island Councils	Memorandum of understanding establishing Island Councils as awareness and referral partners; designated focal persons; quarterly engagement	MoHSLT, ATO, Local Government Authority	600,000	Y1-Y2

12.4 Annual milestones

Initiative	Year 1 (May 2026 – Apr 2027)	Year 2 (May 2027 – Apr 2028)	Year 3 (May 2028 – Apr 2029)
NAHTCC governance	Standing order revised; PGO full member; HRCM observer	Sustained quarterly cycle	Stable governance model
OWG	Roster, procedures, training	≥ 70% of tasks on time	≥ 85% of tasks on time
Legal framework	Legal audit; NRM adopted	Amendment Bill enacted	Implementation
Non-punishment study	Completed; options to NAHTCC	Policy direction adopted	Implementation
Baseline study	Completed and published	Integrated into monitoring	Refresh planned
Integrity safeguards	Code; whistleblower protocol; NGO channel established	Mature operation; compliance audit	Routine practice
Independent oversight feasibility	Study completed	Decision taken	Consequent legislation if needed
Pre-deportation screening	Protocol adopted; piloted	Routine operation	Embedded standing practice
Island Council arrangement	Memorandum signed; focal persons designated	≥ 50% of councils engaged	Full coverage

13. Pillar 2: Prevention, Awareness and Demand Reduction

13.1 Strategic objective

Reduce vulnerability to trafficking through ethical recruitment, source-country-language public awareness, the closure of awareness gaps among under-aware stakeholders identified at the 2025 National Conference, the engagement of Island Councils as awareness partners across the atolls, demand-reduction measures, and engagement of the private sector—most particularly the tourism, construction and recruitment industries—as partners in prevention.

13.2 Logframe

Outcome	Awareness of the HTPA and the response mechanism
Output	Dissemination of Chapter 3 of this Plan; targeted training
Indicator	Survey of awareness; persons trained
Baseline (2026)	Uneven, per 2025 Conference
Y1 → Y3 milestones	Y1: dissemination launched; Y2: targeted delivery; Y3: measurable improvement

Outcome	Multilingual public awareness
Output	Campaign in priority languages
Indicator	% awareness in target communities
Baseline (2026)	Materials limited
Y1 → Y3 milestones	Y1: live; Y2: ≥ 50% reach; Y3: ≥ 70%

Outcome	Island Council awareness partnership
Output	Council-led awareness in inhabited islands
Indicator	Sessions delivered; engagement across councils
Baseline (2026)	Ad hoc
Y1 → Y3 milestones	Y1: pilot in 30 islands; Y2: ≥ 60 islands; Y3: ≥ 100 islands

Outcome	Ethical recruitment regime in force
Output	Public register; mandatory employer compliance
Indicator	Recruitment agencies audited; certified high-risk employers
Baseline (2026)	2023 regulation in force; audits ad hoc
Y1 → Y3 milestones	Y1: register; Y2: all agencies audited; Y3: certification operating

Outcome	Reduced cyber-trafficking exposure and infrastructure-misuse risk
Output	Cyber-trafficking outreach; AI and cyberspace integrity framework
Indicator	Outreach reach; integrity standards adopted
Baseline (2026)	0
Y1 → Y3 milestones	Y1: outreach launched; Y2: framework adopted; Y3: measurable referrals

Outcome	Tourism-sector compliance
Output	Sector Code; manager training; reporting channel
Indicator	% of resort GMs trained; reporting channel use
Baseline (2026)	Absent
Y1 → Y3 milestones	Y1: Code drafted; Y2: signed and 50% trained; Y3: 100% trained

Outcome	Demand-reduction operational
Output	Programme of measures targeting demand for commercial sex and exploitative labour
Indicator	Measures implemented
Baseline (2026)	0
Y1 → Y3 milestones	Y1: design; Y2: launch; Y3: evaluation

13.3 Implementation matrix

Initiative / activity	Three-year deliverable	Lead / supporting	Cost (MVR)	Years
HTPA awareness programme for under-aware stakeholders	Targeted programme for private sector, smaller employers, outer-island authorities and legal community, including dissemination of the legal definitions and the response mechanism set out in Chapter 3 of this Plan	ATO, MoHSLT, MoTCA, legal community, Local Government Authority	1,200,000	Y1-Y2
Multilingual public communication campaign	Materials in Dhivehi, English, Bengali, Hindi, Tamil and Sinhala; hotline awareness in target communities	ATO, LRA, DOFL, MI, CSOs	3,500,000	Y1-Y3
Island Council awareness partnership	Council-led awareness in inhabited islands; designated council focal persons; ATO-developed materials; engagement with imams, schools and youth networks	ATO, LGA, Island Councils, MoE, MoIRH	1,400,000	Y1-Y3
Cyber-enabled trafficking outreach and integrity framework	Public communication on fake overseas job offers; framework on preventing misuse of Maldivian cyberspace; AI integrity standards engagement	ATO, MoHSLT, MPS, MoFA, MDS	1,600,000	Y1-Y3
Ethical recruitment regime	Public register of agencies; mandatory employer certification for high-risk sectors	LRA, DOFL, ATO, AGO	1,800,000	Y1-Y3
Bilateral cooperation arrangements on recruitment	Arrangements with principal sending countries, building on existing arrangement with Bangladesh	MoFA, MoHSLT, DOFL	1,400,000	Y1-Y2
Demand-reduction programme	Annual programme; legal-reform review of demand-side offences	ATO, MPS, AGO, MoHSLT	900,000	Y2-Y3
Tourism sector Code	Code endorsed by MATI; 100% of resort general managers trained; confidential reporting channel	ATO, MoTCA, MATI, CSOs	1,200,000	Y1-Y3
Migrant worker arrival orientation	Information at arrival; rights briefings in worker's language	MI, DOFL, ATO, MWRC	700,000	Y1-Y3

13.4 Annual milestones

Initiative	Year 1 (May 2026 – Apr 2027)	Year 2 (May 2027 – Apr 2028)	Year 3 (May 2028 – Apr 2029)
HTPA awareness gap	Programme designed; Chapter 3 content disseminated	Programme delivered	Measurable improvement
Multilingual campaign	Live in six languages	Reach ≥ 50% in target communities	Reach ≥ 70%
Island Councils	Pilot in 30 islands	≥ 60 islands cumulative	≥ 100 islands cumulative
Cyber trafficking and AI integrity	Outreach launched; framework drafted	Framework adopted	Referrals received and processed
Ethical recruitment	Register operational	All agencies audited	Mandatory certification operating
Tourism Code	Drafted with MATI	Signed; 50% of GMs trained	100% trained
Demand reduction	Programme designed	Launched	Evaluation

14. Pillar 3: Deterrence, Detection, Investigation and Prosecution

14.1 Strategic objective

Convert credible indications of trafficking into investigations, prosecutions and convictions through specialised, well-resourced law enforcement, financial-intelligence and prosecutorial capacity; deliver integrated border management; conduct proactive inspection of high-risk sectors across the atolls in partnership with Island Councils; embed minimum trafficking-indicator screening prior to deportation; and develop dedicated cyber and online-exploitation capability.

14.2 Logframe

Outcome	Operational specialist enforcement and prosecution
Output	MPS Anti-Human Trafficking Department reinforced; PGO Major Crimes Unit designated prosecutors
Indicator	Specialist staff in post; designated prosecutors
Baseline (2026)	Department in place; specialist headcount below need
Y1 → Y3 milestones	Y1: staffing plan funded; Y2: operational; Y3: sustained

Outcome	Increased investigations and prosecutions
Output	Casework throughput
Indicator	Investigations; prosecutions; convictions
Baseline (2026)	0/0/0 in latest period
Y1 → Y3 milestones	Y1: measurable conversion; Y2/3: progressive increases

Outcome	Proactive inspection regime across atolls
Output	Joint inspection schedule with Island Council engagement
Indicator	Inspections by sector; compliance findings
Baseline (2026)	Ad hoc
Y1 → Y3 milestones	Y1: ≥ 80; Y2: ≥ 150; Y3: ≥ 250

Outcome	Pre-deportation trafficking screening
Output	Minimum screening prior to deportation
Indicator	% of pre-deportation cases screened
Baseline (2026)	Not systematic
Y1 → Y3 milestones	Y1: piloted; Y2: routine; Y3: embedded

Outcome	LMIS as integrated intelligence backbone
Output	LMIS built and integrated
Indicator	Phases delivered; anomaly reports produced
Baseline (2026)	Bidding evaluation stage
Y1 → Y3 milestones	Y1: Phase 1; Y2: Phase 2; Y3: full operation

Outcome	Cyber and AI-enabled trafficking capability
Output	Online exploitation capability; AI analytics under LMIS
Indicator	Capability operational; cases referred
Baseline (2026)	Absent
Y1 → Y3 milestones	Y1: designed; Y2: operational; Y3: measurable casework

Outcome	Financial investigation against traffickers
Output	FIU typologies; asset confiscation
Indicator	Typologies; confiscation actions
Baseline (2026)	None specific
Y1 → Y3 milestones	Y1: typologies; Y2: first action; Y3: ≥ 2/yr

14.3 Implementation matrix

Initiative / activity	Three-year deliverable	Lead / supporting	Cost (MVR)	Years
Specialist investigation and prosecution capacity	MPS specialist team appropriately staffed and trained; specialist prosecutors at PGO; standing case-conference protocol with ATO	MPS, PGO, MoHSLT, ATO	4,500,000	Y1-Y2
Joint inspection schedule (atoll-coverage)	Schedule covering construction, fisheries, hospitality and recruitment sectors; quarterly inspection deployments to atolls; coordination with Island Councils for local intelligence; published annual statistics	MPS, LRA, DOFL, MI, Island Councils	3,400,000	Y1-Y3
Pre-deportation trafficking screening	Minimum trafficking screening prior to deportation embedded in immigration enforcement procedures; particular attention to women migrant workers	MI, MPS, ATO, MoHSLT	600,000	Y1-Y2
Labour Market Information System (LMIS)	Integrated platform linking work permits, employment registrations, immigration records, labour complaints, OSH reports and workforce trends; AI-enabled analytics for trafficking anomaly detection; phased build	MoHSLT, DOFL, MI, MDS, ATO	9,500,000	Y1-Y3
Cyber and online exploitation capability	Specialist cyber capability within MPS/ATO; engagement with INTERPOL, Bali Process and Global Partnership Against Online Scams; AI analytics	MPS, ATO, FIU, MoFA, MoHSLT	2,600,000	Y1-Y3
Financial investigation capability	Trafficking-specific suspicious-transaction typologies; asset-confiscation actions	FIU, MPS, AGO, ATO	1,600,000	Y1-Y3
Training of investigators, prosecutors, judges	Sustained programme building on 2025 training; specialist prosecutorial curriculum; annual judicial seminar; Training of Trainers cadre	ATO, MPS, PGO, AGO, Judicial Academy, UNODC	2,500,000	Y1-Y3
Certified translators register	Operational register covering principal languages	ATO, AGO, CSOs	400,000	Y1
Quarterly NAHTCC operational review	Confidential review protocol; annual public statistical summary	NAHTCC, ATO, MPS, PGO	200,000	Y1-Y3

14.4 Annual milestones

Initiative	Year 1 (May 2026 – Apr 2027)	Year 2 (May 2027 – Apr 2028)	Year 3 (May 2028 – Apr 2029)
Specialist enforcement	MPS and PGO staffing plan funded	Capability operational	Sustained operation
Inspections (atoll-coverage)	Schedule operational; ≥ 80 inspections	≥ 150 inspections	≥ 250 inspections
Pre-deportation screening	Pilot operational	Routine across MI	Embedded standing practice
LMIS	Specifications agreed; Phase 1 live	Phase 2 operational	Full operation
Cyber and AI capability	Capability designed	Operational	Measurable casework
Financial investigation	Typologies issued by FIU	First confiscation action	≥ 2 actions per year
Training	200 frontline officers	200 / year with TOT cadre	200 / year sustained

15. Pillar 4: Victim-Centred Protection, Assistance and Reintegration

15.1 Strategic objective

Ensure that every person identified as a trafficking victim, or presenting credible indicators of trafficking, receives prompt, safe and dignified protection, assistance and where applicable reintegration support, drawing on the framework established by Section 35 of the Human Trafficking Prevention Act and informed by a structured study of the support model best suited to the Maldivian context.

Study on the support model best suited to the Maldives

Contemporary practice distinguishes between two principal models of post-identification victim support: a

victim care and trauma-informed care model, which prioritises safety, autonomy, choice and trauma-informed engagement at every interface with the State and service providers; and a

rehabilitation model, which prioritises structured pathways through psychosocial care, livelihood restoration, skills and reintegration. The two models share much in common, but they differ meaningfully in their emphasis, the design of services, and the role of the State. The Plan provides for a structured study, drawing on Maldivian institutional capacity, survivor input and international guidance, to determine which model—or which blended model—is best suited to the Maldivian context. The study’s conclusions will inform the design of the permanent shelter and the reintegration pathway.

15.2 Logframe

Outcome	Adequate shelter capacity operational
Output	Permanent shelter and child-friendly arrangement; SOPs reflecting the chosen support model
Indicator	Capacity; SOP compliance
Baseline (2026)	Temporary facility at National Reintegration Center, Himmafushi (limited); supplementary guest-house arrangements where required
Y1 → Y3 milestones	Y1: model study and requirements scoping; Y2: build/expand; Y3: operational
Outcome	Multilingual hotline operating beyond office hours
Output	MWRC hotline extended
Indicator	Hours; languages; case referrals; AI integration (2nd year)
Baseline (2026)	ATO 8.00–14.00; MPS 24h; Bangla
Y1 → Y3 milestones	Y1: 16/7 in core languages; Y2: 24/7 in 5 languages; Y3: stable 24/7

Outcome	Standardised screening
Output	Preliminary Screening Tool validated and adopted; Section 35 services applied
Indicator	Agencies deploying tool; persons screened
Baseline (2026)	Tool piloted under Operation Kurangi
Y1 → Y3 milestones	Y1: validated and adopted; Y2: deployed across agencies; Y3: measurable volume
Outcome	Non-punishment principle clarified
Output	Legal assessment under Pillar 1; policy direction adopted
Indicator	Cases reflected in PGO and MPS data
Baseline (2026)	Not yet structurally examined
Y1 → Y3 milestones	Y1: assessment; Y2: direction; Y3: implementation
Outcome	Victim-witness protection
Output	Section 35 procedural protections consistently applied; court facilities improved
Indicator	% of cases applying full procedural protections
Baseline (2026)	Provisions exist; courtroom space a noted constraint
Y1 → Y3 milestones	Y1: protocol affirmed; Y2-3: facilities improved
Outcome	Best-fit support model adopted
Output	Decision on victim care vs rehabilitation model (or blended) for the Maldives
Indicator	Study completed; decision recorded; SOPs aligned
Baseline (2026)	Not yet studied
Y1 → Y3 milestones	Y1: study; Y2: decision and SOPs; Y3: full operation
Outcome	Reintegration support
Output	Livelihood, psychosocial, repatriation pathways
Indicator	Victims supported through full pathway
Baseline (2026)	Voluntary repatriation operating
Y1 → Y3 milestones	Y1: pathway defined; Y2: pilots; Y3: full operation
Outcome	Child victim protection
Output	Dedicated child arrangement; education continuity
Indicator	Cases handled
Baseline (2026)	Child-friendly interview rooms exist; no dedicated shelter
Y1 → Y3 milestones	Y1: design; Y2: piloted; Y3: full operation

15.3 Implementation matrix

Initiative / activity	Three-year deliverable	Lead / supporting	Cost (MVR)	Years
Study on the support model best suited to the Maldives	Structured study comparing victim care/trauma-informed care and rehabilitation models (and blends); survivor and stakeholder consultation; recommendations to NAHTCC and Cabinet; design implications for shelter and reintegration	ATO, MoHFW, MoHSLT, HRCM (consult), academic and CSO partners	500,000	Y1
Permanent shelter arrangement	Requirements analysis, build/expand and operationalisation of a permanent shelter, including separate child-friendly arrangement, replacing reliance on guest-house accommodation; design reflecting the chosen support model	MoHSLT, ATO	18,000,000	Y1-Y3
Multilingual hotline expansion (via MWRC)	Hotline expanded to operate beyond office hours in core source-country languages; integration with case-management	ATO, MWRC, MoHSLT	3,600,000	Y1-Y3
Screening tool validation and adoption	Validation session with end-users; formal adoption; deployment across MPS, MI, LRA, DOFL, MoHFW, health services	ATO, MoHSLT, MoHFW, HRCM (consult)	800,000	Y1
Non-punishment implementation	Implementation of the policy direction emerging from the Pillar 1 legal assessment	Cabinet, AGO, MoHSLT, PGO	200,000	Y2-Y3
Court facilities and victim-witness protocols	Improvement of court facilities for confidentiality of trafficking proceedings; reaffirmation of Section 35 procedural protections	PGO, Judicial Department, AGO	1,200,000	Y1-Y2
Reintegration support	Livelihood, education and psychosocial pathways; bilateral cooperation on voluntary repatriation	MoHFW, ATO, MoFA, IOM, CSOs	2,400,000	Y2-Y3
Domestic worker protection	Awareness for domestic workers; complaint channel embedded in MWRC	LRA, DOFL, ATO, MWRC, CSOs	900,000	Y1-Y3
Child victim protection	Dedicated child arrangement; statutory guardianship; education continuity with Ministry of Education	MoHFW, MoE, MoHSLT, ATO	2,600,000	Y1-Y3

15.4 Annual milestones

Initiative	Year 1 (May 2026 – Apr 2027)	Year 2 (May 2027 – Apr 2028)	Year 3 (May 2028 – Apr 2029)
Support-model study	Completed; recommendations to NAHTCC	Decision adopted; SOPs aligned	Embedded in shelter operation
Permanent shelter	Requirements scoping and budgeting	Build / expansion	Operational with audited SOPs
Multilingual hotline	16/7 in core languages	24/7 in 5 languages	Stable 24/7
Screening tool	Validated and adopted	Deployed across all agencies	Measurable screening volume
Non-punishment	Assessment completed (see Pillar 1)	Policy direction adopted	Implementing instructions
Court facilities	Protocols reaffirmed	Facilities improved	Stable operation
Reintegration	Pathway defined	Pilot cases	Full operation
Child protection	Arrangement designed	Piloted	Operational

16. Pillar 5: Cooperation, Partnerships and Engagement

16.1 Strategic objective

Extend the Maldives' counter-trafficking effort through bilateral, regional and multilateral cooperation, strengthen engagement with civil society and survivor networks, and partner constructively with the private sector for ethical recruitment, supply-chain integrity and tourism-sector responsibility.

16.2 Logframe

Outcome	Strengthened bilateral cooperation on recruitment and reintegration
Output	Cooperation arrangements with sending countries; joint reviews
Indicator	Arrangements operational
Baseline (2026)	Bangladesh MoU (9 Feb 2020) in force
Y1 → Y3 milestones	Y1: 1 new arrangement; Y2: ≥ 3; Y3: ≥ 4

Outcome	Active engagement in Bali Process and other regional fora
Output	Sustained delegation participation
Indicator	Meetings attended; commitments delivered
Baseline (2026)	Active throughout 2024-2025
Y1 → Y3 milestones	Y1: all relevant meetings; Y2-3: commitments tracked

Outcome	Engagement with merged HRC mandate
Output	Submissions to Special Rapporteur; possible country visit
Indicator	Annual submission; visit invited
Baseline (2026)	Limited engagement
Y1 → Y3 milestones	Y1: submission; Y2: visit explored; Y3: recommendations reviewed

Outcome	Civil society and survivor partnerships
Output	Forum and small-grants arrangement
Indicator	Forum convened; grants disbursed
Baseline (2026)	Ad hoc partnership
Y1 → Y3 milestones	Y1: Forum operational; Y2-3: grants disbursed

Outcome	Private-sector compliance
Output	Sector charters
Indicator	Charters signed; compliance monitored
Baseline (2026)	Absent
Y1 → Y3 milestones	Y1: drafted; Y2: signed; Y3: monitoring operational

Outcome	Diplomatic personnel trained
Output	Heads of Mission and consular officers
Indicator	% trained
Baseline (2026)	Not yet trained
Y1 → Y3 milestones	Y1: design; Y2: 50%; Y3: 100%

16.3 Implementation matrix

Initiative / activity	Three-year deliverable	Lead / supporting	Cost (MVR)	Years
Bilateral cooperation arrangements	New arrangements with Bangladesh, India, Sri Lanka, Nepal, building on the existing arrangement with Bangladesh; annual joint reviews	MoFA, MoHSLT, ATO, DOFL	1,000,000	Y1-Y2
Bali Process and regional engagement	Sustained delegation; structured Maldivian commitments tracked	MoFA, ATO, MoHSLT	1,400,000	Y1-Y3
Engagement with merged HRC mandate	Submissions to Special Rapporteur; country visit possibility explored	MoFA, ATO, MoHSLT, HRCM (consult)	400,000	Y1-Y3
NGO-Government Forum and survivor engagement	Quarterly Forum; small-grants arrangement for survivor-led initiatives	ATO, MoHSLT, CSOs	1,000,000	Y1-Y3
Private-sector partnership	Sector charters with tourism, construction and fisheries	ATO, MATI, MNCCI, sector bodies	600,000	Y1-Y3
Diplomatic training	All Heads of Mission and consular officers trained; reporting channel to ATO	MoFA, ATO	400,000	Y1-Y2
Global Partnership Against Online Scams engagement	Maldives delegation; partnerships with technology companies; intelligence-sharing under INTERPOL and Bali Process arrangements	MoFA, ATO, MPS	400,000	Y1-Y3

16.4 Annual milestones

Initiative	Year 1 (May 2026 – Apr 2027)	Year 2 (May 2027 – Apr 2028)	Year 3 (May 2028 – Apr 2029)
Bilateral arrangements	1 new arrangement	≥ 3 in total	≥ 4 with joint reviews
Regional engagement	Sustained delegation	Structured commitments tracked	Stable participation
HRC mandate engagement	Annual submission	Country visit possibility explored	Recommendations reviewed
CSO and survivor partnership	Forum operational	Small-grants arrangement live	Mature partnership
Private sector	Charters drafted	Signed; compliance monitored	Mature monitoring
Diplomatic training	Design	50% trained	100% trained
Online scams engagement	Engagement initiated	Partnerships operational	Intelligence sharing

17. Cross-Cutting: Data, Monitoring, Evaluation and Accountability

17.1 Strategic objective

Establish a unified data and accountability system, anchored in the Labour Market Information System and the national baseline study, that enables Government, Parliament, the public and international partners to monitor progress accurately and act on evidence.

17.2 Logframe

Outcome	LMIS as digital backbone of integrated labour governance
Output	LMIS phased build and integration
Indicator	Agencies and modules integrated
Baseline (2026)	Bid evaluation stage
Y1 → Y3 milestones	Y1: Phase 1; Y2: Phase 2; Y3: full operation

Outcome	Baseline study completed
Output	Two-year baseline study completed
Indicator	Study published; data used
Baseline (2026)	Under development for 2 years
Y1 → Y3 milestones	Y1: completed; Y2: used in revision; Y3: refresh planned

Outcome	AI integration in counter-trafficking analysis
Output	AI analytics integrated with LMIS; ethics framework
Indicator	Models in production; framework adopted
Baseline (2026)	Absent
Y1 → Y3 milestones	Y1: framework drafted; Y2: pilot models; Y3: production use

Outcome	Quarterly internal reporting
Output	OWG dashboards to NAHTCC
Indicator	Reports issued; corrective action
Baseline (2026)	Ad hoc
Y1 → Y3 milestones	Y1: cycle established; Y2-3: stable cycle

Outcome	Annual report to People's Majlis
Output	Statutory annual report (July)
Indicator	Submitted on time and comprehensive
Baseline (2026)	First report submitted July 2025
Y1 → Y3 milestones	Y1: July 2026; Y2: July 2027; Y3: July 2028
Outcome	Independent evaluation
Output	Mid-term and final evaluation
Indicator	Evaluations completed and published
Baseline (2026)	n/a
Y1 → Y3 milestones	Y2 close: mid-term; Y3 close: final
Outcome	Survivor-informed monitoring
Output	Feedback mechanisms
Indicator	Feedback acted on
Baseline (2026)	Limited
Y1 → Y3 milestones	Y1: design; Y2-3: operational
Outcome	Transparent budget execution
Output	Dedicated programme code; annual reporting
Indicator	Code adopted; execution rate
Baseline (2026)	Not adopted
Y1 → Y3 milestones	Y1: code adopted; Y2: ≥ 80%; Y3: ≥ 90%

17.3 Headline indicators (reported quarterly to NAHTCC)

- Persons screened for trafficking indicators (disaggregated by sex, age, nationality, sector).
- Formal trafficking victims identified (disaggregated).
- Investigations initiated; cases forwarded to PGO.
- Prosecutions initiated and concluded; convictions; assets confiscated.
- Victims provided with shelter, legal assistance, psychosocial support, reintegration support.
- Joint inspections completed; recruitment-agency audits; employer compliance findings.
- Hotline calls; language distribution; response time; referral outcomes.
- Awareness materials distributed; reach surveyed in foreign-worker communities; Island Council engagement.
- State budget executed against the trafficking-in-persons programme code.
- Bilateral and multilateral engagements concluded.
- Cyber-trafficking referrals received and processed; financial-investigation actions taken.
- Situation Room activity: incidents logged, cross-agency coordination actions taken, and analytical outputs produced—capturing the operational rhythm of the joint response.

Part IV

Delivery

Implementation, monitoring, costing
and risk management

18. Implementation Architecture and Accountability

18.1 Delivery roles

His Excellency the President

Approves and issues the Plan; receives the annual statutory report submitted to the People's Majlis.

Cabinet

Approves the National Referral Mechanism and the amendment package for transmittal to the Majlis.

Minister of Homeland Security, Labour and Technology

Provides strategic direction across the consolidated portfolio; signs the annual report to the President and People's Majlis.

Chairperson of the NAHTCC

Chairs the Committee; convenes quarterly meetings; Ensures accountability milestones.

Anti-Trafficking in Persons Office

Operates as Secretariat to the NAHTCC; convenes the OWG; principal author of annual reviews.

Operational Working Group

Day-to-day operational coordination through specialist personnel released from contributing agencies on a needs basis.

Island Councils

Local awareness, referral and inspection-support partners under a formal arrangement established in Year 1.

18.2 RACI matrix

Initiative	Lead	Accountable	Consulted	Informed
Strategic Plan as a whole	ATO	NAHTCC / MoHSLT	Cabinet, Majlis, partners	Public
NAHTCC governance reform	MoHSLT / ATO	Cabinet	AGO, PGO, HRCM, CSOs	Stakeholders
OWG	ATO	NAHTCC	MoHSLT, contributing agencies	Public via dashboard
NGO-managed anonymous reporting channel	ATO / CSO partner	NAHTCC / MoHSLT	Technical security advisers, HRCM	Public
Feasibility study: independent oversight body	AGO / ATO	NAHTCC	HRCM (consult), academic partners	Cabinet
Legal audit and amendment Bill	AGO / ATO	MoHSLT	PGO, MPS, MI, LRA, DOFL	Majlis
National Referral Mechanism	ATO / MoHSLT	Cabinet	MoHFW, MPS, MI, LRA, DOFL, CSOs, Island Councils	Public
Non-punishment legal assessment	AGO / ATO	MoHSLT	PGO, HRCM (consult)	Cabinet
Baseline study	ATO	MoHSLT	Research partners, NAHTCC	Public
LMIS	MoHSLT	Minister	DOFL, MI, ATO, MDS, FIU	NAHTCC, public
Specialist investigation team	MPS	MoHSLT	PGO, ATO	NAHTCC, public via stats
Specialist prosecutors	PGO	PG	AGO, MPS, ATO	NAHTCC
Joint inspections across atolls	MPS / LRA / DOFL	MoHSLT	Island Councils, industry partners	NAHTCC, public
Pre-deportation trafficking screening	MI	MoHSLT	MPS, ATO, HRCM (consult)	NAHTCC

Initiative	Lead	Accountable	Consulted	Informed
Cyber capability and AI integrity	MPS / ATO / MoHSLT	Minister	FIU, MoFA, MDS, INTERPOL, Bali Process	NAHTCC, public
Multilingual hotline (MWRC)	ATO / MWRC	MoHSLT	Sending-country embassies, CSOs	Public
Permanent shelter	MoHSLT	Cabinet	ATO, MPS, MoHFW	NAHTCC, public
Support-model study	ATO / MoHFW	MoHSLT	HRCM (consult), academic and CSO partners	NAHTCC, Cabinet
Island Council engagement arrangement	ATO / MoHSLT	Cabinet	Local Government Authority, Island Councils	Public
Bilateral cooperation arrangements	MoFA	Cabinet	MoHSLT, ATO, DOFL, sending-country counterparts	NAHTCC, public
Tourism Code	ATO / MoTCA	MoHSLT	MATI, resort operators	Public
Annual report to the Majlis	NAHTCC / ATO	MoHSLT	President's Office, Majlis Secretariat	Public, international partners

19. Monitoring, Evaluation and Learning

19.1 Approach

The Plan adopts a results-based monitoring and evaluation approach capturing both quantitative and qualitative outcomes. Performance is measured against the indicators specified in the logframes in Chapters 12-17 and consolidated in Annex C.

19.2 The monitoring cycle

Quarterly

Performance reviewed by the NAHTCC; corrective action issued; OWG prepares the dashboard.

Annual milestone review (April each year)

Comprehensive review of the year's milestone delivery.

Annual statutory report (July each year)

Submitted to the President and to the People's Majlis under the Act.

Mid-term independent review (Q4 Year 2)

External evaluation with publication.

Final evaluation (Q4 Year 3)

End-of-period evaluation feeding into a successor Strategic Plan.

19.3 Survivor-informed monitoring

All monitoring mechanisms shall include a survivor-feedback component, structured with appropriate safeguards on consent, confidentiality and trauma. Survivor feedback shall be reflected in the design and adjustment of services.

20. Costing and Resource Mobilisation

20.1 Indicative three-year cost envelope

Pillar	Indicative cost (MVR million)	Principal cost drivers
Pillar 1: Governance and legal reform	7.7	OWG operationalisation; legal audit; NRM; baseline study; non-punishment study; oversight feasibility; NGO-managed reporting channel; Island Council arrangement
Pillar 2: Prevention, awareness and demand reduction	13.7	Multilingual campaigns; HTPA awareness; cyber-trafficking outreach; Island Council partnership; tourism sector Code; community awareness
Pillar 3: Deterrence, detection and prosecution	25.1	LMIS; specialist enforcement and prosecution; atoll-coverage inspections; cyber and AI capability; financial investigation; training
Pillar 4: Victim-centred protection	30.1	Permanent shelter; multilingual hotline; screening tool; support-model study; non-punishment implementation; reintegration; child protection
Pillar 5: Cooperation and partnerships	5.3	Bilateral arrangements; regional engagement; HRC mandate; NGO Forum; private-sector charters; diplomatic training; online scams engagement
Cross-cutting: Data, M&E	4.5	LMIS data integration; AI framework; evaluations
Total indicative three-year envelope	≈ 86.4	

20.2 Assumptions

- Costs are indicative and subject to refinement through the annual State Budget process.
- Capital expenditure on the permanent shelter is concentrated in Years 1 and 2.
- LMIS is implemented under SAILS
- Recurrent expenditure on the ATO, hotline, NAHTCC operations and OWG support is treated as a progressively State-funded commitment.
- Costs of MPS specialist team reflect incremental costs above existing establishment.
- Costs do not include the secondment value of officers released to the OWG from contributing agencies, or the in-kind value of Island Council participation.

20.3 Resource mobilisation strategy

State Budget

A dedicated counter-trafficking programme code is established under MoHSLT.

Bilateral and multilateral partners

MoFA leads engagement with partners on programmatic support.

Private sector

Contributions within the framework of sector charters. The NAHTCC shall consider whether to dedicate a defined portion—for example, in the order of 5 per cent—of contributions secured through sector charters to a ring-fenced fund for the permanent shelter and victim-assistance services.

Asset recovery

Where the law permits, recovered assets from convicted traffickers shall be earmarked for victim assistance.

21. Risk Management

The successful implementation of the Plan is subject to identifiable risks. The risk register below shall be reviewed quarterly by the Operational Working Group and annually by the NAHTCC.

Category	Principal risk	Likelihood × impact	Mitigation
Institutional	Continued capacity constraints at ATO and partner agencies	High × High	OWG as force multiplier; AI integration through LMIS; ring-fenced programme code; performance contracts
Operational	Inability to translate screening into investigations and prosecutions	Medium × High	Specialist team in MPS; designated prosecutors; quarterly NAHTCC review
Inter-agency coordination	Recurrence of February 2026 divergences (LRA non-contribution; absence of pre-deportation screening)	Medium × High	NAHTCC-level policy direction; reaffirmation of HTPA obligations; quarterly compliance review
Integrity	Allegations of official complicity	Medium × High	Code of Conduct; whistleblower protocol; NGO-managed anonymous channel; independent oversight feasibility; HRCM referral
Geographic	Difficulty of routine inspection across atolls and resort properties	Medium × Medium	Joint mobile inspection teams; Island Council partnership; mandatory employer reporting; remote-monitoring tools
Political	Public or political resistance to extending protection to foreign nationals	Low-Medium × Medium	Communication framing as labour-market integrity and national security; engagement with Majlis
External	Withdrawal of donor support or shifts in bilateral assistance	Medium × Medium	Progressive State Budget assumption; diversified partners
Reputational	Continued unfavourable Tier 2 Watch List rating, or downgrade	Medium × High	Transparent annual report; structured engagement with TIP Office; rapid Year 1 delivery
Emerging cyber	Misuse of Maldivian cyberspace, payment rails or AI services	Medium × High	Cyber-trafficking working group; AI integrity framework; FIU typologies; engagement with Global Partnership Against Online Scams
Capacity	Loss of trained personnel to private sector or international postings	Medium × Medium	Retention measures; bonding; institutionalised TOT cadre

Part V

Annexes

Legal framework, accountability, indicators,
reporting template and references

Annex A: Legal and Policy Framework

- Human Trafficking Prevention Act (Law No. 12/2013, as amended).
- Employment Act, as amended by Law No. 10/2024 (ratified 1 September 2024), strengthening employer obligations to expatriate workers.
- Maldives Immigration Act and regulations.
- Child Rights Protection Act.
- Occupational Safety and Health Act.
- Penal Code provisions relevant to forced labour, sexual exploitation, complicity, online exploitation and money-laundering.
- Human Rights Commission Act.
- Anti-Money Laundering and Counter-Terrorism Financing Act.
- Domestic Violence Prevention Act.
- Witness Protection arrangements and procedural laws.
- Employment Agency Regulation (2023), including the categorisation system and security deposit framework.
- Foreign labour regulations under MoHSLT.
- Maldives National Security Policy 2012, which identified unregulated migrant labour as a strategic national security concern.
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, supplementing the UN Convention against Transnational Organized Crime (2000)—ratified by the Maldives in September 2016.
- SAARC Convention on Preventing and Combating Trafficking in Women and Children for Prostitution.
- ILO Conventions 29, 105, 138, 182 and the Protocol of 2014 to the Forced Labour Convention.

Annex B: RACI Stakeholder Accountability Matrix

Initiative	Lead	Accountable	Consulted	Informed
Strategic Plan as a whole	ATO	NAHTCC / MoHSLT	Cabinet, Majlis, partners	Public
NAHTCC governance reform	MoHSLT / ATO	Cabinet	AGO, PGO, HRCM, CSOs	Stakeholders
Operational Working Group	ATO	NAHTCC	MoHSLT, contributing agencies	Public via dashboard
NGO-managed anonymous reporting channel	ATO / CSO partner	NAHTCC / MoHSLT	Technical security advisers, HRCM	Public
Feasibility study: independent oversight body	AGO / ATO	NAHTCC	HRCM (consult), academic partners	Cabinet
Legal audit and amendment Bill	AGO / ATO	MoHSLT	PGO, MPS, MI, LRA, DOFL	Majlis
National Referral Mechanism	ATO / MoHSLT	Cabinet	MoHFW, MPS, MI, LRA, DOFL, CSOs, Island Councils	Public
Non-punishment legal assessment	AGO / ATO	MoHSLT	PGO, HRCM (consult)	Cabinet
Baseline study	ATO	MoHSLT	Research partners, NAHTCC	Public
LMIS	MoHSLT	Minister	DOFL, MI, ATO, MDS, FIU	NAHTCC, public
Specialist investigation team	MPS	MoHSLT	PGO, ATO	NAHTCC, public via stats
Specialist prosecutors	PGO	PG	AGO, MPS, ATO	NAHTCC
Joint inspections across atolls	MPS / LRA / DOFL	MoHSLT	Island Councils, industry partners	NAHTCC, public
Pre-deportation trafficking screening	MI	MoHSLT	MPS, ATO, HRCM (consult)	NAHTCC

Initiative	Lead	Accountable	Consulted	Informed
Cyber capability and AI integrity	MPS / ATO / MoHSLT	Minister	FIU, MoFA, MDS, INTERPOL, Bali Process	NAHTCC, public
Multilingual hotline (MWRC)	ATO / MWRC	MoHSLT	Sending-country embassies, CSOs	Public
Permanent shelter	MoHFW / MoHSLT	Cabinet	ATO, MPS, MoF	NAHTCC, public
Support-model study	ATO / MoHFW	MoHSLT	HRCM (consult), academic and CSO partners	NAHTCC, Cabinet
Island Council engagement arrangement	ATO / MoHSLT	Cabinet	Local Government Authority, Island Councils	Public
Bilateral cooperation arrangements	MoFA	Cabinet	MoHSLT, ATO, DOFL, sending-country counterparts	NAHTCC, public
Tourism Code	ATO / MoTCA	MoHSLT	MATI, resort operators	Public
Annual report to the Majlis	NAHTCC / ATO	MoHSLT	President's Office, Majlis Secretariat	Public, international partners

Annex C: Indicators Master List with Annual Milestones

The indicator master list consolidates all indicators from the pillar logframes against which performance is measured throughout the Plan period.

Indicator	Baseline (2026)	Year 1	Year 2	Year 3
Trafficking investigations initiated	0	Measurable conversion from screening	Material increase	Material increase
Trafficking prosecutions filed	0	Forward movement	Material increase	Material increase
Trafficking convictions	0	—	First convictions	Sustained casework
Persons screened (per year)	MPS 68 (2024-2025), MI 68 (2024-2025)	Baseline under revised tool	Material increase	≥ 500
NRM adopted and operational	Absent	Adopted	Deployed	Embedded
Baseline study completed	Under development 2 yrs	Completed and published	Used in revisions	Refresh planned
Hotline hours / languages	ATO 8-14, MPS 24h / 2 lang	16/7 in core languages	24/7 in 5 languages	Stable 24/7
Shelter status	Temporary Himmafushi	Requirements scoped	Build/expand	Operational
Support-model study	Not yet undertaken	Completed	Decision adopted	Embedded
Independent oversight feasibility	Not yet studied	Study completed	Decision taken	Any consequent legislation
NGO-managed reporting channel	Absent	Established	Operational	Mature
Bilateral cooperation arrangements	Bangladesh 2020 only	≥ 1 new	≥ 3 in total	≥ 4 with joint reviews
Joint inspections per year	Ad hoc	≥ 80	≥ 150	≥ 250

Indicator	Baseline (2026)	Year 1	Year 2	Year 3
Island Council engagement (islands)	0	30	≥ 60	≥ 100
Pre-deportation trafficking screening	Not systematic	Pilot	Routine	Embedded
LMIS status	Bids accepted	Phase 1 live	Phase 2	Full operation
Cyber-trafficking referrals processed	0	Capability designed	Operational	Measurable casework
Asset confiscation actions per year	0	Typologies issued	1+	2+
State recurrent budget executed against programme code	Code not adopted	Code adopted; ≥ 60%	≥ 80%	≥ 90%



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