



**RCNI Submission to the  
Public Consultation on the  
Review of the Criminal Justice (Spent Convictions  
and Certain Disclosures) Act 2016**

**November 2020**

### Introduction – Rape Crisis Network Ireland

Rape Crisis Network Ireland (RCNI) is a specialist information and resource centre on rape and all forms of sexual violence. The RCNI role includes the development and coordination of national projects such as using our expertise to influence national policy and social change, and supporting and facilitating multi-agency partnerships. We are owned and governed by our member Rape Crisis Centres who provide free advice, counselling and other support services to survivors of sexual violence in Ireland.

### Introduction – This Submission

RCNI welcomes very much this opportunity to make submissions to the Public Consultation on the Review of the existing legislation on spent convictions set out in the Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016 (“the 2016 Act”)<sup>1</sup>. The 2016 Act now excludes most sexual offences from its ambit. However, in limited circumstances, some serious sexual offences listed in Part 1 of Schedule 1 of the 2016 Act, may become spent. It appears also that some sexual offences are missing from the list of excluded sexual offences in Schedule 1 of the 2016 Act altogether. The 2016 Act excludes all convictions which result in a custodial sentence of more than 12 months and has a single rehabilitation period applicable to all eligible offences of 7 years.

The proposed Criminal Justice (Rehabilitative Periods) Bill 2018 (“the 2018 Bill”)<sup>2</sup> does not alter either Part 1 or Part 2 of Schedule 1 of the 2016 Act, but does introduce a series of graded “relevant periods” after which eligible offences would become spent. These periods increase with the length of the sentence imposed, and are 50% shorter for offenders who are between 18 and 25 at the time of the offence (see Section 4 and Schedule 1 of the 2018 Bill) as they are for offenders who were over 25 at that time.

Section 3 of the 2018 Bill also proposes that the maximum length of sentence which is eligible to become spent should be fixed at 24 rather than 12 months for custodial sentences and at 4 years or less rather than 2 years or less, for non-custodial sentences.

RCNI’s view that **no** sexual offences should be allowed to become spent is elaborated in some detail in its 2012 Observations on the Criminal Justice (Spent Convictions) Bill 2012<sup>3</sup>. Our concern is that if the proposed 2018 Bill is enacted, it will mean that many more previously excluded convictions for sexual offences will now become spent and therefore, will not now have to be disclosed on any application for vetting made to the National Vetting Bureau. In our view, this is neither safe nor just: it has the potential to increase the

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<sup>1</sup> Available online via this web-link: <https://revisedacts.lawreform.ie/eli/2016/act/4/front/revised/en/html>

<sup>2</sup> Latest online version (as amended in Committee) is available via this web-link: [https://data.oireachtas.ie/ie/oireachtas/bill/2018/141/eng/ver\\_a/b141a18s.pdf](https://data.oireachtas.ie/ie/oireachtas/bill/2018/141/eng/ver_a/b141a18s.pdf)

<sup>3</sup> Available online via this web-link: <https://www.rcni.ie/wp-content/uploads/RCNISpentConvictionsBill.pdf>

risk of experiencing sexual violence among children and vulnerable persons in particular, and does nothing to help ensure that those responsible for perpetrating sexual violence are made accountable for the extraordinary harm caused to their victims.

### **Structure of this Submission**

This submission is an updated version of the 2012 RCNI Observations on the proposed Criminal Justice (Spent Convictions) Bill 2012 (“the 2012 Bill”). It begins by setting out the case for excluding convictions for **all** sexual offences from the possibility of becoming spent. Then it sets out the case for ensuring that the relevant maximum sentence lengths are not increased for the sexual offences which may now become spent, in the event that the 2018 Bill is not amended in such a way as to exclude them. It concludes with recommendations for the exclusion of certain additional sexual offences and for amendment of Section 258 of the Children Act 2001.

### **Submission 1: No conviction for *any* sexual offence should be capable of becoming spent, under either the existing 2016 or the proposed 2018 Bill or any other statutory provision**

In 2012, RCNI welcomed the exclusion of most sexual offences from the 2012 Bill. However, we also expressed concern that **not all sexual offences** were excluded from the benefits of that Bill to convicted persons. In our respectful submission, it is appropriate that sexual offences should all be excluded, because of their gravity, their impact on their victims and because the same offences can be founded on such widely different facts. We are supported in this view by the Law Reform Commission, whose recommendation was that **all** sexual offences should be excluded from the ambit of legislation allowing for convictions to become spent.<sup>4</sup>

### **Sexual Offences Convictions which could have become spent under the Criminal Justice (Spent Convictions) Bill 2012, [now enacted as the Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016]:**

These offences are listed at Schedule 1, Part 1 of the 2016 Act, at paragraphs 2, 3 and 4. They include: sexual assault, indecent assault, incest by males, and incest by females over 17 years, where the “other party” (the victim) was over 17 at the time of the offence and there was no custodial sentence (paragraph 2), a defilement offence where the victim is aged over 15 and under 17, buggery of persons under 17 years of age, gross indecency with males under 17, where the “other party” (the victim) was aged over 15 but under 17, and the person guilty of the offence was aged not more than 3 years older than the victim at the date of the offence (paragraph 3). Finally, a defilement offence will attract the benefit of the

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<sup>4</sup> The Law Reform Commission Report on Spent Convictions (2007), LRC 84-2007, is available on the LRC website, [www.lawreform.ie](http://www.lawreform.ie). The relevant sections and the LRC recommendation on sexual offences can be found at Appendix I hereto for easy reference.

Act, if the child victim was under 17 and the person convicted of the offence was not more than 24 months older than that child at the time of the offence (paragraph 4).

The defilement offence referred to in paragraph 2 is that formerly known as “unlawful carnal knowledge” under Section 2 of the Criminal Law Amendment Act 1935. The other defilement offences referred to are those in Section 3 of the Criminal Law (Sexual Offences) Act 2006 (paragraph 4). These include sexual intercourse, buggery, aggravated sexual assault, and two forms of penetrative offence: oral or anal penetration by the penis, and penetration of the vagina by any object “held or manipulated by another person”.

In the 2016 Act, if the conviction concerned has resulted in a sentence longer than 12 months, it cannot become spent. However, the 2018 Bill proposes that that maximum sentence length should now be increased to **24** months and to a period of **4** years in the case of a non-custodial sentence instead of the current 2 years.

RCNI submits that there should not be any exceptions to the general rule in both the 2016 Act and the 2018 Bill that convictions for sexual offences do not ever become spent, for the following reasons:

**(1) Sexual offences are serious by their very nature and therefore, convictions for sexual offences entail public safety concerns:** Sexual offences are among the most serious and personally devastating crimes against the person imaginable. Victims of sexual violence are affected in profound and long-lasting ways, in every aspect of their lives. The negative effects range from extremely serious psychological and physical conditions, such as depression, self-harming behaviour, suicidal thoughts, addiction problems, agoraphobia, obsessive compulsive disorders and post-traumatic stress disorder (PTSD), through relationship and sexual difficulties, and losing the ability to work or study as before, or at all, - and consequent economic disadvantage. The Law Reform Commission Report on Spent Convictions (2007), cited above, makes the same point at paragraph 3.14:

“.....the Commission considers that the grave harm that is caused to the victims of such crimes coupled with the risks posed to public safety and particularly the safety of vulnerable members of society require that such offences should not be deemed suitable for expungement....”

**(2) Public Safety Concerns:** RCNI remains concerned that many victims of sexual violence who are quite vulnerable might encounter convicted sex offenders in work-related contexts without any impediment, if the convictions which they have are regarded as spent under the Act, and consequently, the sex offenders in question are under no obligation to disclose them.

**(3) Convictions for the same sexual offence of the same length and/or type, may be based on very different facts** – the length and/or type of sentence is a very crude and imperfect indicator of the seriousness of what happened, and may bear very little relation to its impact on its victim. Further, in this country there is not much in the way of judicial

guidance as far as sexual offences other than rape are concerned, though this is set to change as soon as the Sentencing Guidelines and Information Committee of the Judicial Council begins its work. This means that sentencing practice for sexual offences other than rape varies widely across all criminal courts, particularly the District and Circuit Criminal Courts.

Multiple variables involved in sentencing process show us that length of sentence is not a very accurate reflection of the harm caused – these offences can disclose offending very serious in its impact on the victim, which resulted in a low sentence for reasons which had nothing at all to do with the victim<sup>5</sup>. This objection in our view goes to the very heart of why convictions for sexual offences should not ever become spent. The range of different factors involved in an individual conviction, or series of convictions, and which have to be taken into account on sentence, is enormous. Not all of these factors have to do with the circumstances of the offence itself. It may be that the circumstances of the offence are outweighed on sentence by the personal circumstances of the offender, as in the example cited above. Length or type of sentence is not always a very accurate indicator of the gravity of the offending, or of the risk of future re-offending. It does not seem fair to victims that perpetrators who avoid custodial sentences because of their personal circumstances should also be able to regard their convictions as spent after a period, because the harm caused is just as serious for the victims as it would be in the absence of any “personal circumstances” on the part of the convicted person.

**(4)** While the argument might be made that some convictions for sexual offences which do attract the benefit of the 2016 Act are for offences which do not come under the Sex Offenders Act 2001, the Law Reform Commission Report on Spent Convictions also makes the point that there is a very wide difference between the absence of an obligation to notify one’s address, etc under the SOA 2001, and the total expungement of a conviction for a sexual offence. RCNI agrees with the Law Reform Commission<sup>6</sup> that the fact that a conviction for a sexual offence is not covered by SOA 2001 does not mean that it should be capable of being expunged permanently.

### **Convictions for Sexual Assault and Indecent Assault:**

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<sup>5</sup> For example, on 18 June 2012, the Irish Times reported on a case in the Central Criminal Court which involved multiple counts of rape, incest and sexual assault against 5 victims, which resulted in an 18 months sentence, apparently because the judge was satisfied that the convicted man had a terminal illness which would result in his death weeks or months after the sentence.

<sup>6</sup> See paragraph 3.18 of the LRC Report on Spent Convictions (2007): “The Commission considers that there is a great difference between ceasing the requirement to register as a sex offender and wiping the slate clean for sex offenders. The Commission considers that all sexual offences are of such a serious nature that it would be inappropriate to expunge such offences under any circumstances and the Commission therefore recommends that sexual offences should be excluded from the application of the proposed spent convictions scheme.”

(5) Charges of sexual assault are the most frequently brought charges for sexual crimes in our courts, by some distance<sup>7</sup>. Convictions for sexual offences excluding rape and aggravated sexual assault which result in either non-custodial sentences or sentences under 24 months are not a rare occurrence, either.<sup>8</sup>

### Historic Child Sexual Abuse and Sexual/Indecent Assault:

(6) Historic child sexual abuse is often charged as sexual assault or indecent assault. While each individual act upon which a charge of sexual assault is based might not sound serious or dramatic, the grave damage to victims in cases of historic child sexual abuse lies in the **pattern of these acts**, often repeated many times over a period of months or years, and often planned carefully by the perpetrator to occur at times and places safest for him. Very often in cases of historic child sexual abuse, there are only sample counts on the indictment, which may or may not be an accurate reflection of a pattern of repeated abuse over a lengthy period. It is quite possible that the resulting sentence in turn will not reflect the seriousness of the offending accurately, either. At present, sexual assault and indecent assault convictions could become spent if they do not result in a custodial sentence. This means that the criminal justice system has failed to acknowledge, and sanction appropriately, these grave offences on behalf of their victims. This failure does not encourage victims to report child sexual abuse to the Gardaí and/or help bring these perpetrators to justice.

(7) Sentencing years ago was more lenient for historic child sexual abuse. Years ago, sentencing for historic child sexual abuse, charged as indecent or sexual assault, was generally more lenient, and non-custodial sentences were not unusual. For many survivors of child sexual abuse, the fact that the perpetrator's conviction would be on his record until his death represented the **only meaningful sanction** he would ever suffer, until the 2016 Act was passed. This is no longer the case where the perpetrator was charged with sexual or indecent assault only and duly convicted, but did not get a custodial sentence. In our respectful submission, this is not fair to that cohort of victims.

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<sup>7</sup> In 2019, CSO statistics indicated that there were 1,765 sexual assaults recorded, while the corresponding figure for rape in 2019 was 822. See web-link: <https://statbank.cso.ie/px/pxeirestat/Statire/SelectVarVal/Define.asp?maintable=CJA01&PLanguage=0>

<sup>8</sup> The Courts Service Annual Report for 2019 tells us that 125 persons were convicted in the District Court of sexual offences, where maximum penalty is 12 months imprisonment. In the Circuit Court, there is no breakdown of numbers imprisoned for sexual offences which separates out those who received a sentence of 24 months or less, but it is possible to say that out of a total of 1,311 convictions there for sexual offences, 775 were non-custodial (including suspended sentences). There were 536 sentences of imprisonment handed down for sexual offences by the Circuit Court in 2019, but no breakdown into sentence bands. See the whole Report via this web-link: <https://www.courts.ie/acc/alfresco/9bd89c8a-3187-44c3-a2e9-ff0855e69cb5/CourtsServiceAnnualReport2019.pdf/pdf#view=fitH>

(8) Since the Supreme Court case of *DPP vs Judge Devins & Anor [2012] IESC 7*, there is no possibility that buggery which occurred before 1993 can be charged as such. Many of these cases can now only be charged as indecent assault, a **less serious** offence than buggery for sentencing purposes. This means that convictions for indecent assault are more likely to be based on the **serious** fact of buggery. If the overall sentence is reduced to less than 24 months because of some mitigating factor which has little or nothing to do with the facts of the case, a conviction for indecent assault based on facts which amount to buggery may become spent. In our respectful submission, this does not represent justice for the victims of such crimes.

**Convictions for Incest:**

(9) We would respectfully submit that to exclude convictions for incest where both people concerned were over 17 at the time of the offence and there is no custodial sentence, would represent a failure to provide a meaningful sanction for the harm which can be caused to its victims by this kind of behaviour, often as part of a **pattern of intra-familial abuse**. We would also say that this kind of offending, like child sexual abuse, often consists of repeated abusive behaviour over a lengthy period of months or years, and therefore is often represented at trial by sample counts only. The result may be that there is a conviction on a small number of counts only, reflected in a short custodial, or even a non-custodial sentence. This kind of sentence is unlikely to reflect the harm caused to the victim(s) concerned. The establishment or the extension of a criminal record which cannot be expunged does create a **meaningful sanction** which goes some way towards recognizing the harm done to the victim, however.

**Convictions for “Defilement”, formally known as Sexual Act with a Person under 17 and Sexual Act with a Person under 15 (both offences under Criminal Law (Sexual Offences) Act 2006 as amended):**

(10) Since Section 17 of the Criminal Law (Sexual Offences) Act 2017<sup>9</sup> came into force, cases of “defilement” (meaning certain sexual acts between an adult and a person under the age of consent) between two people whose dates of birth differ by no more than 24 months are unlikely to be prosecuted **unless** the behaviour of the accused is abusive or exploitative of the other person, that other person is under the age of 15, or the accused person is in a position of authority over the other person. This means that convictions for defilement are not likely to be based on underage but factually consensual sexual activity.

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<sup>9</sup>The whole Act may be accessed via this web-link:

<https://revisedacts.lawreform.ie/eli/2017/act/2/front/revised/en/html>

We note that any custodial sentence of 12 months or under for defilement where complainant and perpetrator are no more than 24 months apart, may become spent under the 2016 Act and that it is proposed to extend this maximum sentence length to 24 months in the 2018 Bill. We submit that convictions for defilement should not ever become spent, as these are not minor sexual assaults but penetrative acts (sexual intercourse, buggery, anal or oral penetration by the penis, penetration of the vagina by an object), or acts which amount to aggravated sexual assault.

**RCNI recommends that** Part 1 of Schedule 1 to the 2016 Act, and any provisions in the Act relating to this Part, are all repealed so that **all** sexual offences are excluded from this Act.

**Submission 2: If it is decided not to amend the 2016 Act to exclude all the sexual offences listed in Part 1 of Schedule 1, the 2018 Bill should be amended to ensure that convictions for these offences cannot become spent if they are any longer than the current maxima of 12 months for custodial sentences and 2 years for non-custodial sentences.**

RCNI submits that while it would be best if sexual offences were excluded altogether from the 2018 Bill, there is no sustainable rationale for increasing the maximum sentence lengths for those sexual offences which may become spent. The logical result of increasing these limits from 12 to 24 months for custodial sentences, and 2 years to 4 years for non-custodial sentences, can only be that more persons convicted of sexual offences will be able to escape the consequences of those convictions, provided that they do not make an application to be vetted for a job in which a necessary and regular part of that role consists mainly of having access to, or contact with, children or vulnerable people - to the National Vetting Bureau.

There is nothing in the vetting legislation to prevent anyone whose convictions for sexual offences are spent from working on a self-employed, sole trader basis with children or vulnerable people, nothing to prevent them having access to children or vulnerable people as part of a private or family arrangement which is not for profit, and nothing either to prevent them from having contact with, or access to, children or vulnerable people in terms outside the National Vetting Bureau (Children and Vulnerable Persons) Act 2012<sup>10</sup>, for example in roles in which they interact with children or vulnerable people only occasionally or casually.

Accordingly, enacting the 2018 Bill as drafted would result in an increase in the number of persons convicted of sexual offences with no legal obligation to disclose those offences, who are able to get occasional or sporadic access to or contact with, vulnerable persons or children. RCNI respectfully submits that this is not a desirable outcome from the point of view of the safety of either of these groups.

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<sup>10</sup> Available online at: <https://revisedacts.lawreform.ie/eli/2012/act/47/front/revised/en/html>

RCNI also submits that there are many adult survivors of historic child sexual violence in whose case the perpetrators though convicted, were handed down relatively lenient sentences compared to those imposed today. Allowing the maximum sentences to be increased from 12 to 24 months means that there will now be even more survivors for whom the sentence imposed does not come close to being a true reflection of the gravity of the violence. As argued above in relation to the 2016 Act, the fact of the conviction and its negative effect on the standing of the perpetrator in the community – was for many survivors, the sole significant marker of the gravity of the crime committed against them. If even more of these convictions become capable of being spent, it means that even fewer of this group of survivors will have been vindicated by our criminal justice system.

**RCNI recommends that** if it is decided not to exclude all sexual offences by way of amendment to the 2016 Act and the 2018 Bill, then the original sentencing maxima above which it is not possible for convictions to become spent, should be allowed to remain at current levels, that is, at 12 months for custodial sentences and 2 years for non-custodial sentences.

### **In conclusion:**

**RCNI also recommends that** consideration is given to adding the following sexual offences to Part 2 of Schedule 1 of the 2016 Act (none is included in the current list of sexual offences in that Part of Schedule 1 to the Act).

- Offences contrary to Section 18 Criminal Law (Sexual Offences) Act 2017 as amended (sexual acts with persons aged 17 **only** which are committed by a person in authority)<sup>11</sup>;
- Offences contrary to Sections 25 and 26 Criminal Law (Sexual Offences) Act 2017 (payment for sexual activity with a prostitute and payment for the purposes of prostitution with a trafficked person respectively);
- Offences contrary to Section 45 Criminal Law (Sexual Offences) Act 2017 (exposure, offensive behaviour of a sexual nature).

None of these offences is trivial or unimportant in nature and every one of them has the potential to cause serious harm to any victims. For these reasons, they should all be excluded from the benefits of the 2016 Act, that is, they should not be capable of becoming spent.

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<sup>11</sup> The text of the whole Act is available via this web-link:  
<https://revisedacts.lawreform.ie/eli/2017/act/2/front/revised/en/html>

Finally, **RCNI recommends that** Section 258(1) of Children Act 2001<sup>12</sup> is allowed to remain as it is as far as paragraph “c” is concerned, so that the period after which certain findings of guilt do not have to be disclosed remains at three years rather than the new one year period proposed by Section 11 of the 2018 Bill.

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### **Appendix I**

#### **Extract from the Law Reform Commission Report on Spent Convictions (2007):**

“3.13 The Commission has concluded that the nature and seriousness of certain offences give rise to legitimate public safety concerns and that these concerns cannot easily be addressed by the provisions of spent convictions schemes. Thus, the Commission considers that it is appropriate to exclude certain offences from the application of the proposed spent convictions scheme. Under section 258(1)(b) of the Children Act 2001, the spent convictions scheme established by that Act provides that offences which are required to be tried by the Central Criminal Court are excluded. Thus, the most serious offences against the person are excluded from the protection of the Act. The Commission is of the opinion that a similar provision would be appropriate in relation to the proposed scheme for adults. The Commission recommends therefore that the proposed spent convictions scheme for adult offenders should exclude any offence which is required to be tried by the Central Criminal Court.

3.14 The Commission notes that, as a general rule in other jurisdictions, sexual offences are excluded from the protection of spent convictions schemes. Most sexual offences are already effectively excluded from the application of the scheme for juvenile offenders under the *Children Act 2001* by virtue of the fact that offences that are required to be tried by the Central Criminal Court are ineligible for expungement, although no specific provision exists to that effect in the legislation. The Commission believes that the same should be the case in relation to the proposed scheme for adult offenders in this jurisdiction. There are two reasons for this. First, the Commission considers that the grave harm that is caused to the victims of such crimes coupled with the risks posed to public safety and particularly the safety of vulnerable members of society require that such offences should not be deemed suitable for expungement. The second consideration is that since the introduction of the

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<sup>12</sup> Online text of the Section is available at:

<https://revisedacts.lawreform.ie/eli/2001/act/24/section/258/revised/en/html>

registration requirements in the *Sex Offenders Act 2001* (mirroring comparable provisions in the British *Sex Offenders Act 2001*) it would not be possible to deem many sexual offences to be spent since the offender in question may be under a requirement to notify for life under the 2001 Act.

3.15 Section 8(3) of the 2001 Act requires a sex offender to comply with the notification obligation for an “indefinite” period if the sentence imposed is one of imprisonment for life or for a term of more than 2 years. The notification obligation is 10 years if the sentence is more than 6 months but not more than 2 years, 7 years if the sentence imposed is a term of 6 months or less, and 5 years if the sentence imposed is suspended or is non-custodial. The time periods for offenders under 18 years of age at the time of the commission of the offence are reduced to 5 years, 3½ years and 2½ years, respectively, in respect of the three latter sentences.

3.16 In this jurisdiction therefore, an offender who is sentenced to imprisonment for 2 years or more must continue to notify indefinitely. Any proposed spent convictions scheme which would allow for the expungement of a sexual offence for which an individual was sentenced to 2 years or more would, in the Commission’s view, be very difficult to reconcile with the 2001 Act.

3.17 The position in Britain is similar. The *Sex Offenders Act 1997*<sup>108</sup> requires certain convicted and cautioned offenders to register their new addresses with their local police force with 14 days of being released from custody or on moving home. Registration requirements apply to offenders who have been convicted or cautioned of a specified offence,<sup>109</sup> persons found not guilty by reason of insanity, persons unfit to plead but who have been found to have done the act charged and other persons who are still in the criminal justice process.<sup>110</sup> As is the case under the Irish 2001 Act (which was based on the 1997 Act), the requirements to register and notify apply for a period of time that varies according to the seriousness of the offence, but is a lifetime requirement for a person sentenced to 30 months or more.<sup>111</sup>

3.18 The Commission is aware that not all sex offenders are required to comply for life with the notification requirements of the 2001 Act and that those sentenced to less than 6 months imprisonment must comply for 7 years while those given a suspended or non-custodial sentence must comply for 5 years.<sup>112</sup> However, the Commission does not consider that this should ground an argument that sexual offences should be eligible for expungement after the other requirements of the legislation have been met. The Commission considers that there is a great difference between ceasing the requirement to register as a sex offender and wiping the slate clean for sex offenders. The Commission considers that all sexual offences are of such a serious nature that it would be inappropriate to expunge such offences under any circumstances and the Commission therefore recommends that sexual offences should be excluded from the application of the proposed spent convictions scheme.

<sup>108</sup> The 1997 Act applies to England and Wales, and Scotland.

<sup>109</sup> These specified offences are contained in Schedule 1 of the *Sex Offenders Act 1997* and include all sexual offences including indecent assault and offences of possessing indecent material in relation to children.

<sup>110</sup> Section 1 of the *Sex Offenders Act 1997* sets out the categories of persons subject to the registration requirements of the Act.

<sup>111</sup> The notification requirements are set out in section 2 of the *Sex Offenders Act 1997*.

<sup>112</sup> The Commission is aware of the proposed amendments to the 2001 Act in the *General Scheme of the Criminal Law (Trafficking in Persons and Sexual Offences) Bill 2006* which is discussed in detail in Chapter 4 below.

3.19 *The Commission recommends that any offence which must be tried in the Central Criminal Court and all sexual offences should be excluded from the application of the proposed spent convictions scheme”.*

