

15th GENERAL REPORT

GRETA

**Group of Experts on Action
against Trafficking in Human Beings**



covering the period from
1 January to 31 December 2025



COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

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in Human Beings

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1 January to 31 December 2025

French edition:

*15^e rapport général
GRETA – Groupe d'experts sur la lutte
contre la traite des êtres humains*

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COUNCIL OF EUROPE CONVENTION ON ACTION AGAINST TRAFFICKING IN HUMAN BEINGS



Introduction by the President of GRETA

I am pleased to introduce the 15th General Report on the activities of the Group of Experts on Action against Trafficking in Human Beings (GRETA), covering the period from 1 January to 31 December 2025.

The year 2025 marked the 20th anniversary of the opening for signature of the Council of Europe Convention on Action against Trafficking in Human Beings. The comprehensive provisions of this ground-breaking treaty have translated into real progress in national legislation, policies and practice, making a lasting impact on how countries tackle human trafficking through the lens of the human rights-based and victim-centred approach followed by the Convention. The independent and systematic monitoring of the implementation of the Convention undertaken by GRETA has triggered many positive changes, resulting in new legislation, the adoption of comprehensive national anti-trafficking strategies and action plans, and greater recognition of the rights of victims of human trafficking.

While significant progress has been made, the persistence of human trafficking and the emergence of new forms of exploitation call for renewed efforts from all stakeholders. By shedding light on emerging trends and challenges, GRETA helps shape more effective strategies to combat this serious human rights violation.

In this General Report, GRETA highlights the particular challenges of human trafficking for the purpose of exploitation in criminal activities, which is a rapidly growing trend, accounting for an increasing number of identified victims, many of whom are children. This form of trafficking is often linked with other forms of organised crime, such as drug trafficking, property crimes, migrant smuggling, money laundering, document and payment card fraud, and cybercrime. The recruitment of victims is often initiated online, via job announcements, service advertisements, gaming sites and social media. Victims are compelled or forced to perform activities that constitute crimes or other unlawful activities. Failure to identify them as victims of human trafficking results in their being arrested, prosecuted, imprisoned and/or deported. As stressed by GRETA's reports, it is important to look beyond appearances in order to be able to identify victims at an early state and apply the non-punishment provision of the Convention (Article 26).

GRETA has continued to make progress on the fourth evaluation round of the Convention, with 12 country evaluation visits carried out in 2025. Consequently, more than half of the Parties of the Convention have already received a visit as part of the fourth evaluation round, which was launched in mid-2023. The focus of this evaluation round is on vulnerabilities to human trafficking and measures to prevent them, to identify and assist vulnerable victims, and to ensure accountability of offenders. Bearing in mind the complexity and intersectionality of vulnerabilities to trafficking, GRETA examines the measures taken in respect of children, persons with disabilities, disadvantaged minorities, migrant workers, asylum seekers and LGBTI persons, as well as the vulnerabilities related to the gender dimension of human trafficking. While it is too early to take stock of GRETA's findings from the fourth evaluation round of the Convention, it is clear that meaningful prevention needs to go beyond awareness-raising campaigns and encompass consistent social and economic measures, strengthened legislation and advanced training.

As part of the fourth evaluation round of the Convention, GRETA also pays particular attention to the role of information and communication technology (ICT), which brings structural changes to the way offenders operate and exacerbates existing vulnerabilities. Digital platforms, encrypted communications and anonymous transactions enable traffickers to expand their activities while complicating detection and prosecution. GRETA's country reports highlight both the risks and the opportunities created by new technologies, including the rapid development of artificial intelligence (AI). While these innovations can enhance detection and support of victims, they can also create new vulnerabilities and avenues for exploitation, such as online sexual exploitation and cyber scam centres to which victims are lured with false job offers and forced to commit online fraud. By monitoring emerging trends and promoting responsible use of technology, GRETA seeks to ensure that advances in ICT and AI serve the fight against human trafficking, rather than facilitating the recruitment and exploitation of victims.

In this context, I would like to highlight the holding of the high-level conference "Empowering Change: Technology and Artificial Intelligence in the Fight against Human Trafficking", under the Maltese Presidency of the Committee of Ministers of the Council of Europe, in June 2025. The event explored how emerging technologies can support efforts to prevent human trafficking, protect victims and prosecute

perpetrators, while upholding human rights. The relevance of the new Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law, as well as of the Second Additional Protocol to the Convention on Cybercrime, were highlighted in this connection.

GRETA has continued developing synergies with other Council of Europe bodies, including GREVIO, the Lanzarote Committee, the Consultation Group on the Children of Ukraine, the Parliamentary Assembly of the Council of Europe and the Congress of Local and Regional Authorities.

At the international level, GRETA has continued forging links with European Union and United Nations agencies, the Organization for Security and Co-operation in Europe (OSCE), the Office for Democratic Institutions and Human Rights (ODIHR) and the Council of Baltic Sea States (CBSS). We are grateful to these institutions for taking GRETA's work into account in their activities. It is of crucial importance to avoid duplication of efforts, especially at times of budgetary cuts, and deliver co-ordinated and mutually reinforcing messages to maximise international impact.

In 2025, the composition of GRETA was partially renewed. I would like to warmly thank the previous President of GRETA, Ms Helga Gayer, the former Second Vice-President, Sergey Ghazinyan, and the other former GRETA members for their commitment, professionalism and contribution to monitoring of the implementation of the Convention and promoting the Convention's provisions and GRETA's work.

The impact of GRETA's monitoring work depends on continued engagement with States Parties. It is also of crucial importance that the Council of Europe continues assisting member States in implementing the recommendations made by GRETA and the Committee of the Parties through targeted co-operation activities. I trust that the Council of Europe will preserve, use and strengthen the unique monitoring mechanism that has been put in place by the Convention.

Conny Rijken
President of GRETA

2025 SNAPSHOT

MONITORING

15 INDEPENDENT EXPERTS

GRETA is the only independent panel of experts monitoring the implementation of international legal provisions on combating trafficking in human beings.

12 EVALUATION VISITS

Armenia, Belgium, Bosnia and Herzegovina, France, Ireland, Latvia, Luxembourg, North Macedonia, Norway, Portugal, Serbia and Slovenia.

13 FINAL REPORTS

Albania, Austria, Bulgaria, Croatia, Cyprus, Denmark, Georgia, Liechtenstein, Moldova, Montenegro, Romania, Slovak Republic and Ukraine.

IMPACT

- Legislative changes
- Changes to victim identification procedures
- Setting up of specialised shelters for victims of trafficking
- Adoption of comprehensive national strategies and action plans to combat human trafficking

IMPACT

SUPPORT IN IMPLEMENTING GRETA'S RECOMMENDATIONS

8 ROUND TABLES

on the follow-up to GRETA's evaluation reports

Azerbaijan, Hungary, Iceland, Netherlands, North Macedonia, Poland, Serbia and Sweden

4 CO-OPERATION PROJECTS

Austria, Bosnia and Herzegovina, North Macedonia, and Serbia



53rd GRETA meeting, Strasbourg, France, 24-28 March 2025

Activities during the period from 1 January to 31 december 2025

Introduction

1. GRETA is set up pursuant to Article 36 of the Council of Europe Convention on Action against Trafficking in Human Beings (“the Convention”) to monitor the implementation of the Convention by the Parties. GRETA is composed of 15 members, who sit in their individual capacity and are independent and impartial in the exercise of their functions. GRETA started functioning in February 2009, following the entry into force of the Convention on 1 February 2008, and is currently the only independent panel of experts monitoring the implementation of binding international legal provisions on combating trafficking in human beings.
2. This report is drawn pursuant to Rule 26 of GRETA’s Internal rules of procedure, according to which GRETA shall submit to the Committee of the Parties and the Committee of Ministers an annual report on its activities, containing, inter alia, information on the organisation and internal workings of GRETA and on its activities proper.

GRETA meetings

3. In the course of 2025, GRETA held three five-day plenary meetings in Strasbourg (in March, July and November). During these meetings, GRETA adopted 12 final country reports: one as part of the third evaluation round (concerning Ukraine) and 11 as part of the fourth evaluation round (concerning Albania, Bulgaria, Croatia, Denmark, Georgia, Latvia, Malta, Montenegro, the Republic of Moldova, Romania and the United Kingdom). GRETA also discussed draft reports concerning Armenia, Bosnia and Herzegovina, France, Norway and Portugal, which were sent to the national authorities for comments and will be the subject of final adoption by GRETA and publication in 2026.
4. Further, at its plenary meetings, GRETA considered reports submitted by the authorities of Azerbaijan, North Macedonia, Poland, Serbia, Slovenia and Spain on measures taken to comply with Committee of the Parties' recommendations and agreed on issues which should be followed up in the context of the on-going dialogue with the respective authorities.
5. At its 54th meeting (30 June - 4 July 2025), GRETA decided to set up a working group to prepare a draft guidance note on residence permits for victims of trafficking (Article 14 of the Convention). The working group subsequently held several meetings and reported on the progress of its work at GRETA's 55th meeting.
6. Moreover, at its 55th meeting (17-21 November 2025), GRETA decided to prepare an updated compendium of good practices in the implementation of the Convention on the basis of GRETA's reports. The first such compendium had been issued in 2016, followed by a Compendium of Good Practices on Combating Trafficking for the Purpose of Labour Exploitation, published in 2021.
7. At its 54th meeting, GRETA had an exchange of views with Judge Davor Derenčinović and Judge Maria Elosegui from the European Court of Human Rights (see paragraph 102). Further, at its 55th meeting, GRETA held an internal discussion on the intersections between technology, trafficking and exploitation.
8. During the reporting period, GRETA received a number of communications concerning issues covered by the Convention, which were discussed at GRETA's plenary meetings. The Convention does not provide for an individual complaints procedure, but according to the Rules of procedure for evaluating implementation of the Convention (Rule 10), the Executive Secretary brings to the attention of GRETA any relevant communication addressed to it. In some cases, GRETA decided to send letters to the relevant authorities, inquiring about legislative, institutional or policy developments.

Country visits and evaluations

9. In the course of 2025, GRETA carried out a total of 12 country evaluation visits as part of the fourth evaluation round of the Convention (to Armenia, Belgium, Bosnia and Herzegovina, France, Ireland, Latvia, Luxembourg, North Macedonia, Norway, Portugal, Serbia and Slovenia).



GRETA's fourth evaluation visit to France, 16-25 June 2025 - Meeting with the Minister for Gender Equality, and the Secretary General of the Interministerial Mission for the Protection of Women against Violence and the Fight against Trafficking in Human Beings (MIPROF)

10. GRETA's country visits were an occasion to hold meetings with relevant professionals, clarify and supplement the responses provided to its questionnaire, and assess the practical implementation of adopted measures. Thus, meetings were held with national anti-trafficking co-ordinators, officials from relevant ministries and governmental agencies, law enforcement officers, prosecutors, judges, labour inspectors, social workers, child protection officials, local authorities' representatives and other relevant professionals. Separate meetings were held with representatives of Ombudsman institutions and/or independent human rights institutions, which in some countries fulfil the role of national rapporteurs on human trafficking. Further, in most countries visited, GRETA met Members of Parliament. Civil society organisations, persons with lived experience of human trafficking, trade unions, lawyers, employers' associations and academic researchers were also consulted during the visits. Moreover, GRETA met representatives of international organisations working on issues related to its mandate.

11. The country visits provided an opportunity for GRETA to visit facilities where protection and assistance are provided to victims of trafficking, to meet their staff and to exchange, on a confidential basis, with any victims willing to do so. During its evaluation visits in 2025, GRETA visited specialised shelters for victims of human trafficking in Armenia, Bosnia and Herzegovina, France, Ireland, Luxembourg, North Macedonia, Norway, Portugal and Serbia.

12. During its evaluation visits, GRETA paid particular attention to the situation of child victims of trafficking and other children in vulnerable situations, including unaccompanied and separated children. In Belgium and France, GRETA visited specialised shelters for child victims of trafficking. Further, GRETA visited facilities for unaccompanied children in Bosnia and Herzegovina, Ireland and Slovenia. In Armenia, GRETA visited the Children's House (Barnahus) and a residential institution for children without parental care. In North Macedonia, GRETA visited the SOS Village for children and a daycare centre for street children in Skopje.



GRETA's fourth evaluation visit to Ireland, 1-5 December 2025 – Meetings with the Minister of Justice (left) and the Chief Commissioner of the Irish Human Rights and Equality Commission (right)

13. GRETA also visited facilities for asylum seekers in Bosnia and Herzegovina, Latvia, Norway and Portugal, and immigration detention facilities, where victims of trafficking may be held in France, Latvia, North Macedonia, Norway, Portugal and Slovenia.

14. On 23 January 2025, GRETA launched the third round of evaluation of the Convention in respect of Belarus by sending the questionnaire for this round to the Belarusian authorities. The Belarusian authorities' reply was received on 11 June 2025. As a result of the suspension of co-operation between the Council of Europe and Belarus, GRETA was not in a position to carry out a country visit to Belarus, which is an essential part of GRETA's evaluations, providing the opportunity to examine the situation on the ground and to collect information from a range of sources. Nevertheless, with a view to supplementing the information provided by the Belarusian authorities in their reply to the questionnaire and preparing a draft report on Belarus, GRETA organised online meetings with relevant officials and organisations in November - December 2025.

IN 2025, GRETA'S COUNTRY VISITS WERE AN OCCASION TO MEET RELEVANT ACTORS



National anti-trafficking co-ordinators,
officials from relevant ministries and
governmental agencies

Representatives of Ombudsman Institutions
and other Independent human rights
institutions, national rapporteurs



Law enforcement officers, prosecutors,
judges, lawyers

IMPACT

Labour inspectors, trade unions
and employer's associations



Local authorities' representatives, including
child protection officials, social workers and
other relevant professionals

Members of Parliament



Persons with lived experiences, civil
society organisations, researchers and
investigative journalists

AND TO VISIT



Facilities where assistance is provided to victims of trafficking

- Specialised shelters for victims of trafficking in Armenia, Bosnia and Herzegovina, France, Ireland, Luxembourg, North Macedonia, Norway, Portugal and Serbia
- Safe houses for victims of domestic violence, also accommodating victims of trafficking, in Bosnia and Herzegovina and Serbia



Facilities for child victims of trafficking, unaccompanied children and other vulnerable children

- Children's House (Barnahus) in Yerevan (Armenia)
- Residential institution for children without parental care in Abovyan, Kotayk region (Armenia)
- Centre for the reception of child victims of trafficking in Flanders (Belgium)
- Safe house for unaccompanied children in Sarajevo (Bosnia and Herzegovina)
- Shelter for child victims of trafficking in the Hautes-Pyrénées (France)
- Unit accommodating unaccompanied children operated by Tusla (Ireland)
- "Lighthouse Transition Care" centre for young people (Latvia)
- SOS Village for children and a daycare centre for street children in Skopje (North Macedonia)
- Asylum reception centre for unaccompanied and separated children in Postojna (Slovenia)



Centres for asylum seekers

- Reception centre for asylum seekers in Abovyan, Kotayk region (Armenia)
- Reception centre for asylum seekers in Ghent (Belgium)
- Emergency shelter for asylum seekers in Martinique (France)
- Asylum reception centre (Latvia)
- Vikhammer Asylum Centre in Trondheim (Norway)
- Asylum reception centre (CAR 1) in Bobadela (Portugal)



Detention facilities for irregular migrants

- Temporary reception centre for migrants in Blažuj (Bosnia and Herzegovina)
- Detention centre for foreigners in Matoury (French Guiana)
- Immigration detention centre in Mucenieki (Latvia)
- Gazi Baba Reception Centre for Foreigners in Skopje (North Macedonia)
- Vinojug Temporary Transit Centre for migrants in Gevgelija (North Macedonia)
- Trandum Police Immigration Detention Centre in Oslo (Norway)
- Immigration detention centre at Lisbon Airport (Portugal)
- Immigration detention centre in Postojna (Slovenia)



GRETA's Bureau members: from left to right, Luka Maderić, Second Vice-President, Conny Rijken, President, and Antoaneta Vassileva, First Vice-President

GRETA membership and Bureau

15. In 2025, the composition of GRETA was partially renewed, following the elections of eight GRETA members by the Committee of the Parties to the Convention on 29 November 2024. As a result of these elections, four GRETA members were re-elected for a second term of office, and four new members were elected. The mandates of these eight members will run from 1 January 2025 until 31 December 2028. An induction meeting for the new GRETA members took place on 21 March 2025.

16. At the 53rd meeting (24-28 March 2025), GRETA elected its new Bureau for the next two-year period. Professor Conny Rijken, who is the Dutch National Rapporteur on Human Trafficking and Sexual Violence against Children, was elected as GRETA's President. Antoaneta Vassileva, Head of the Bulgarian Safer Internet Centre, was re-elected as GRETA's First Vice-President. Luka Maderić, a Croatian lawyer, was elected as GRETA's Second Vice-President. During the year, the Bureau held periodic meetings concerning the organisation of GRETA's work.

17. The composition of GRETA and its Bureau during the reporting period is set out in Appendix 3.



48 State Parties to the Convention

- ▶ 46 Council of Europe member States
- ▶ Non-member States: Belarus and Israël

Signatures and ratifications of the Convention

18. No new ratifications of the Convention took place during the reporting period. The total number of Parties to the Convention remains at 48 (see Appendix 1).

19. All Council of Europe member States have ratified the Convention. GRETA recalls that the Convention is open to non-member States and hopes that more states which are not members of the Council of Europe will express interest in, and accede to, the Convention.

20. Through their participation in various events, GRETA members and Secretariat have continued promoting the Convention's standards (see Appendix 9). In 2025, presentations on the Convention were made to representatives of Egypt, Kyrgyzstan and Tunisia. The Convention also serves as the basis for co-operation projects in Morocco and Tunisia.¹

1.

[South Programme \(coe.int\)](https://www.coe.int)



Visibility and impact of the monitoring process

Publicity of GRETA's reports

21. In accordance with Article 38, paragraph 6, of the Convention, the final reports and conclusions of GRETA are made public, together with any final comments by the Party concerned.
22. In 2025, 13 GRETA country evaluation reports were made public, of which two under the third evaluation round of the Convention (concerning Liechtenstein and Ukraine), and 11 under the fourth evaluation round (concerning Albania, Austria, Bulgaria, Croatia, Cyprus, Denmark, Georgia, the Republic of Moldova, Montenegro, Romania and the Slovak Republic).
23. A press release is issued whenever a GRETA report is published. In addition, interviews are given by GRETA members and the Secretariat to journalists, serving as a basis for press articles and broadcasts. According to the sample processed by the Council of Europe Media Monitoring and Analysis Unit, the reports issued by GRETA generated substantial media coverage throughout the year.
24. Following the publication of GRETA's fourth report on **Albania** on 18 June 2025, media coverage highlighted progress, such as the updated National Referral Mechanism and improvements in victim support and prevention. Outlets including *Gazeta Tema*, *RTSH*, *Albanian Post*, *Liberale.al*, and *Fjala.al* emphasised GRETA's recommendations to strengthen awareness-raising and outreach work in Roma and Egyptian communities, to ensure that migrant workers enjoy the same rights and protection as Albanian workers, and to establish a state compensation system for victims of trafficking.

25. The findings of GRETA's fourth report on **Austria**, published on 11 March 2025, received extensive coverage in national and international media (*APA, Bezirksjournal.at, Die Presse, Der Standard, Kleine Zeitung, Kronen Zeitung, Kurier, Kurier Online, MSN, Puls24, Salzburger Nachrichten, Salzburg24, VOL.at, Vienna News*). The media echoed GRETA's call for proactive inspections and enhanced safeguards for vulnerable groups.
26. GRETA's fourth report on **Bulgaria**, published on 8 October 2025, was widely covered by radio, TV, newspapers and online media, including the *Bulgarian National Radio, Bulgaria ON AIR, Dnes.bg, Era Nova, Nova.bg, BTA (Bulgarian Telegraph Agency), Novini.bg, DarikNews.bg* and *Chernomore.bg*. Media relayed GRETA's concerns regarding the insufficient financial resources allocated to combating human trafficking and the need for further steps to prevent trafficking of migrant workers, including by increasing the resources of the General Labour Inspectorate.
27. The publication of GRETA's report on **Croatia**, on 19 June 2025, was covered by the media outlets *HINA, Index.hr* and *Dnevnik.hr*, which referred to GRETA's recommendations to strengthen labour inspections, enhance monitoring of private employment agencies, and expand specialised shelter capacity.
28. GRETA's report on **Cyprus**, published on 28 April 2025, was covered by several outlets, including *The Cyprus Mail, Cyprus Inform* and the *Cyprus News Agency*, which emphasised GRETA's recommendations to provide better training for frontline professionals, improve victim identification, and introduce safeguards for domestic workers.
29. GRETA's fourth report on **Georgia** was published on 20 October 2025 and covered by *1TV.ge*. GRETA's third report on **Liechtenstein** was published on 3 February 2025 and was covered by the *Liechtensteiner Vaterland*.
30. Following the publication of GRETA's report on the **Republic of Moldova** on 10 June 2025, outlets such as *NewsMaker, JurnalTV.md, Point.md, RecordNews, Logospress.md* and *Telegraph.md* emphasised GRETA's recommendations to expand the mandate and improve the training of labour inspectors, and to step up efforts to prevent child trafficking by regularly inspecting residential institutions and providing social and economic support to vulnerable children.
31. GRETA's fourth report on **Montenegro**, published on 3 November 2025, received wide coverage across TV, newspapers and online media, including *eTV, Antena M, In4s, CdM* and *NewsMax Balkans*, with eTV's *Budilnik* programme presenting the findings in detail. Media highlighted the precarious situation of migrants, whose work permits tie them to specific employers, increasing vulnerability to trafficking.
32. GRETA's fourth report on **Romania**, published on 12 November 2025, received broad coverage from outlets including *Agerpres, The Romania Journal, Viața liberă, Romania Insider* and *Mediafax*. Media highlighted legislative progress and the new victim identification and referral mechanism. Coverage further stressed the need to tackle online recruitment, raise awareness, and improve police and prosecutor training.
33. GRETA's fourth report on the **Slovak Republic**, published on 26 March 2025, was relayed by the *Slovak press agency* and in several media (*TASR, Teraz.sk, Bleskovky, HNonline, Topky.sk, SME.sk*). Media highlighted GRETA's recommendations to strengthen the protection of children in state care, to enhance the capacity of labour inspectors to identify victims of trafficking, and to improve victims' access to compensation and the prosecutions of perpetrators.

34. Following the publication of GRETA's third report on **Ukraine** on 12 June 2025, media outlets such as *Ukrinform*, *Zerkalo Nedeli* and *PRM.ua* emphasized GRETA's recommendations to set up a state compensation scheme accessible to victims of trafficking, to ensure that all presumed and identified victims of trafficking receive adequate assistance and support, and to adopt legislation on child-friendly justice.

35. **GRETA's social media accounts** on X (ex-Twitter - @CoE_Trafficking) and LinkedIn (Action against Trafficking in Human Beings) have proved to be useful methods for exchange, highlighting not only GRETA's and the Council of Europe anti-trafficking activities in general, but also for bringing partners' activities to the attention of social media followers. Both platforms attracted a growing number of followers, reactions and shares. A dedicated social media campaign was launched around 16 May 2025 to mark the 20 years of the Council of Europe Convention on Action against Trafficking in Human Beings. In 2025, 61 posts were published on X, which includes almost 2 500 followers. Posts relating to GRETA reports have, in particular, generated an increase in the engagement rate of followers/visitors and in the number of impressions (number of times users have seen a post), which totalled 23 048. The posts relating to the country reports published by GRETA generated a large number of views (9 635) followed by those published on the occasion of the 20th anniversary of the Anti-Trafficking Convention (3 251). On LinkedIn, the number of followers increased from 2 172 in 2024 to 2 910 in 2025, the total number of impressions for the year 2025 was 83 000 and the total number of reactions, comments and reposts was 3 131.



New database of domestic case-law on human trafficking

36. In September 2025, a new database of national case-law on human trafficking was launched as part of the HUDOC-GRETA Database. It contains cases which have been identified during GRETA's evaluations or submitted by members of the Council of Europe Network of specialised lawyers and NGOs providing legal assistance to victims of human trafficking. The database aims to provide legal professionals, policymakers, NGOs and researchers with a broad and accessible collection of case-law from States Parties to the Council of Europe Convention on Action against Trafficking in Human Beings.



Practical impact of GRETA's monitoring work

37. Based on GRETA's reports published in the course of 2025, the following section provides examples of measures taken by State Parties to improve their legislation, policy and practice in the light of GRETA's previous recommendations.



ALBANIA

- ▶ In its third report, GRETA urged the Albanian authorities to improve the identification of victims of human trafficking. A new National Referral Mechanism (NRM) was adopted, which expanded the list of agencies involved in the identification of victims, and guidance tools and training were developed for relevant professionals. Further, the authorities increased the number of mobile units in charge of detecting possible victims of trafficking among vulnerable groups.
- ▶ With a view to improving assistance to victims of human trafficking, the state funding provided annually to the four specialised shelters for victims of trafficking (one state shelter and three NGO shelters) was increased. The state shelter was renovated and its capacity was increased, including rooms for persons with disabilities.
- ▶ In response to another recommendation made in GRETA's third report, measures were taken to improve victims' access to legal assistance and free legal aid. Several NGOs assisting victims were authorised to provide legal assistance. The Free Legal Aid Directorate also supported the establishment of an NGO network of professionals providing legal assistance and free legal aid to victims of crime, including victims of trafficking.



AUSTRIA

- ▶ The 7th National Action Plan on Combating Human Trafficking (2024-2027), which was developed through broad consultation, takes into account GRETA's previous recommendations, new trends and risks.

- ▶ In its third report, GRETA urged the authorities to address the risks of human trafficking in the agricultural sector. The Working Group on trafficking for the purpose of labour exploitation dedicated three meetings to this topic in 2021 and set up sub-working group to address labour exploitation in the agricultural sector. Austria also participated in the European Labour Authority (ELA) campaign “Rights4allSeasons” in 2021.
- ▶ A new chapter was introduced to the Federal Office for Immigration and Asylum (BFA) binding instructions for the Dublin procedure (*Verbindliche Arbeitsanleitung “Dublin-Verfahren”*) according to which human trafficking is relevant for the Dublin procedure and can be grounds for accepting a person into the national asylum system instead of transferring them to the country of the first asylum claim. An individual assessment must be made on whether the trafficked person would be likely to experience a human rights violation due to the transfer.



BULGARIA

- ▶ In October 2022, the Prosecutor General issued Instructions for the organisation of work in relation to pre-trial proceedings opened for human trafficking. The aim of these binding Instructions is to introduce a unified mechanism for handling and supervising cases of human trafficking, provide an effective protection of the rights of victims, overcome difficulties in the prosecution, and improve inter-agency co-ordination and international co-operation.
- ▶ An independent evaluation of the National Strategy for Combating Trafficking in Human Beings (2017-2021) was conducted in October 2022, following which the annual National Programmes for Countering Human Trafficking and the Protection of Victims follow a revised format to ensure clearer, more comprehensive planning.
- ▶ In 2024, the budget of the National Commission for Combating Trafficking in Human Beings was increased by almost 190% to BGN 950,800 (approximately €486,000).



CROATIA

- ▶ With a view to strengthening action against trafficking for the purpose of labour exploitation, as recommended by GRETA in its third evaluation report, the Croatian authorities adopted legislative and policy measures aimed at combating unlawful employment and providing greater protection and guarantees against exploitation to migrant workers.
- ▶ In its third report, GRETA urged the Croatian authorities to take further steps to protect vulnerable victims of trafficking and to prevent intimidation during the investigation and court proceedings. In March 2024, the Criminal Procedure Act was amended to expand the protective measures available to victims of trafficking in criminal proceedings. Specifically, audio-visual means are now to be used as a rule in relation to all victims of trafficking, unless they specifically request otherwise.



CYPRUS

- ▶ A new National Strategy on the Prevention and Combating of Trafficking in Human Beings (2023-2026), accompanied by a National Action Plan, were prepared by the Multidisciplinary Co-ordinating Group, taking into account GRETA's previous recommendations.
- ▶ The staff of the Police Office for Combating Trafficking in Human Beings, which is responsible for the formal identification of victims and the investigation of cases of human trafficking, has been increased. Further, in 2023 the Social Welfare Services set up an Anti-Trafficking Unit, comprising eight social workers, which is responsible for co-ordinating the provision of assistance to victims.
- ▶ The National Referral Mechanism has led to an increase in the detection of presumed victims of trafficking, in particular amongst asylum seekers, as well as victims of labour exploitation. Training and guidance on detecting human trafficking has been provided to relevant staff, including those involved in the asylum procedure and labour inspectors.



DENMARK

- ▶ The 6th National Action Plan to Combat Trafficking, covering the period 2022-2025, was supported by increased funding, including for outreach activities by specialised NGOs.
- ▶ Greater attention was devoted to preventing the exploitation of migrant workers, including through the establishment of an Inter-Ministerial Working Group tasked with addressing social dumping and strengthening the protection of vulnerable foreign workers, and the adoption of new legislation.
- ▶ To strengthen the investigation and prosecution of complex economic and organised crime cases, the National Special Crime Unit was established and the South Jutland Police District was designated as the body responsible for national monitoring efforts regarding human trafficking.



GEORGIA

- ▶ Acting upon the recommendations made by GRETA to improve the identification of victims of trafficking, the authorities issued guidelines on the identification of victims by members of the mobile groups and the Permanent Group in charge of granting victim status, as well as a new questionnaire for identification interviews.
- ▶ With a view to improving the fight against labour exploitation, legislation was passed to reinforce the powers and autonomy of the Labour Inspection Office and expand its mandate in relation to migrant workers. Measures were also taken to regulate and control the activities of intermediary companies involved in the placement of migrant workers. Further, a working group was set up by the Prosecutor's Office with the participation of the police, the Ministry of Justice and the Labour Inspection Office to strengthen the criminal justice response to cases of trafficking for the purpose of labour exploitation.

- In response to another recommendation made in GRETA's third report, in 2021, the Law on Combating Trafficking in Human Beings was amended to ensure that victims' access to state compensation is not conditional on failure to obtain compensation from the perpetrators.



REPUBLIC OF MOLDOVA

- Following GRETA's third report, Articles 90 and 901 of the Criminal Code were amended to prohibit the court from issuing a conviction with conditional or partial suspension of the prison sentence in cases involving particularly serious or exceptionally serious offences, such as human trafficking (Article 165) and child trafficking (Article 206). Further, Article 60 of the Criminal Code was amended to specify that, in cases of child trafficking, the statute of limitations begins to run from the date the child reaches the age of 18.
- Acting upon a recommendation made by GRETA in its third report, Parliament amended Article 110-1 of the Criminal Procedure Code in November 2022 to make the application of special interviewing conditions mandatory for all children in criminal cases related to human trafficking (previously it was mandatory for children up to 14 years of age).
- In its third evaluation report, GRETA urged the Moldovan authorities to set up centres providing assistance, including accommodation, to male victims of trafficking. In response to this recommendation, in February 2021, the National Social Assistance Agency, in partnership with IOM, opened a shelter for male victims and presumed victims of trafficking in Chişinău. Located within a centre for the elderly and people with disabilities, the shelter can accommodate up to 10 people.



MONTENEGRO

- Acting upon a recommendation made by GRETA in its third report, the Criminal Code was amended in December 2023 to include a specific provision on the non-punishment of victims of trafficking for offences they were compelled to commit and to expand the definition of human trafficking.
- Further, pursuant to the December 2024 amendments to the Law on Free Legal Aid, victims of trafficking are now entitled to receive funds to fully or partially cover the costs of legal advice and representation in judicial proceedings as well as in the context of out-of-court dispute resolution.
- As recommended in GRETA's third evaluation report, a shelter for child victims of trafficking was opened in 2024.



ROMANIA

- A new National Strategy against Trafficking in Human Beings (2024-2028) and the accompanying National Action Plan for 2024-2026 include measures which reflect GRETA's previous recommendations.

- ▶ In its third report, GRETA urged the Romanian authorities to take measures to strengthen the criminal justice response to human trafficking. Subsequently, the Criminal Code was amended in 2024, increasing the sanctions for human trafficking and prohibiting courts from issuing suspending prison sentences for the offences of slavery, trafficking in human beings and child trafficking. Further, a law adopted on 30 October 2024 added forced criminality to the forms of exploitation related to human trafficking.
- ▶ Several legislative changes were made to improve victim's access to justice, in line with GRETA's previous recommendations. Law No. 217 of 10 July 2023 amended the Criminal Procedure Code to explicitly include adult and child victims of trafficking amongst the categories of persons entitled to mandatory legal assistance. Law No. 230, adopted in 2022, entitles victims of human trafficking to claim state compensation for moral damages, in addition to material damages. Further, new legislation adopted in November 2024 expanded access to free legal aid and state compensation and enhanced the protection of personal data of victims in judicial proceedings.



SLOVAK REPUBLIC

- ▶ With a view to improving the identification of victims of human trafficking, the National Referral Mechanism was revised in 2020, simplifying the procedure for the identification and referral to assistance of victims and introducing more detailed provisions regarding child victims of trafficking.
- ▶ In its third report, GRETA urged the Slovak authorities to facilitate and guarantee access to compensation for victims of trafficking. Following GRETA's recommendation, the Victims Act was amended in July 2021, simplifying the access of victims of violent crimes, including human trafficking, to state compensation.
- ▶ Following GRETA's recommendation, Article 40, paragraph 2, of the Criminal Code was amended to cover all offences committed by a person under duress due to the fact that they were a victim of human trafficking.



UKRAINE

- ▶ The State Targeted Social Programme for Combating Trafficking in Human Beings for 2023-2025 was adopted in June 2023 and the state funding allocated for its implementation was increased compared to that available for the previous Programme.
- ▶ The Law on Free Legal Assistance was amended in August 2023 in order to include persons who have been granted the status of victims of human trafficking by the National Social Service amongst the beneficiaries of free secondary legal assistance.
- ▶ With a view to ensuring effective procedural guidance for pre-trial investigation in criminal proceedings related to human trafficking, a specialised department to deal with human trafficking was created at the Prosecutor General's Office in June 2023, comprising five prosecutors.

Activities related to the implementation of GRETA's recommendations

38. With a view to promoting better understanding of the Convention's provisions and GRETA's recommendations, stimulating dialogue between relevant stakeholders and identifying areas where the Council of Europe can support national anti-trafficking efforts, **eight round-table meetings** were organised in the course of 2025, in chronological order, in Poland (28 February), North Macedonia (2 April), Serbia (10 April), Azerbaijan (24 April), the Netherlands (8 July), Sweden (9 September), Iceland (30 September), and Hungary (13 November).



Round-table meeting on the follow-up to GRETA's third evaluation report on Poland, 28 February 2025

39. A meeting of the **network of lawyers and NGOs specialised in providing legal assistance to victims of human trafficking** took place in Strasbourg on 3-4 November 2025. During the meeting, participants discussed the application of Article 14 (residence permits) of the Council of Europe Convention on Action against Trafficking in Human Beings, issues around the misclassification of cases of trafficking in human beings, the use of open-source investigations to support legal practice, and ways to step up the private sector's role in preventing and combating trafficking. Further, on 13 March 2025, a webinar was organised for the network to present recent developments in the European Court of Human Rights case-law on trafficking in human beings.

40. In order to promote the implementation of the Convention and support national efforts to combat trafficking in human beings, GRETA members and Secretariat took part in a number of **events organised by States Parties** (see Appendix 9). For example, on 26 May 2025, Dorothea Czarnecki took part in a workshop organised by the German National Reporting Mechanism on Trafficking in Human Beings entitled "Trafficking and Exploitation of Children and Adolescents – Professional Exchange of



Sixth meeting of the network of lawyers and NGOs specialised in providing legal assistance to victims of human trafficking, Strasbourg, 3–4 November 2025

Child and Youth Welfare Departments”. On 16 October 2025, the President of GRETA participated in the Annual Conference on Combating Trafficking in Human Beings organised by the Austrian Task Force on Combating Human Trafficking in Vienna, while David Mancini took part in an event organised by the Italian Department for Equal Opportunities on the occasion of the European Anti-Trafficking Day in Rome. Further, on 20 October 2025, the President of GRETA and the Executive Secretary participated in the conference “30 years of combating trafficking in human beings, a future to be written”, organised by the Belgian Ministry of Justice and Myria in Brussels, Belgium.

41. On the basis of GRETA’s reports, the Council of Europe assists member States to strengthen the implementation of the Convention by organising **targeted co-operation activities**. The aim of these projects is to support the implementation of country-specific recommendations contained in GRETA’s reports, thereby strengthening national capacities to prevent and combat trafficking in human beings (see Appendix 6 for the list of relevant activities).

42. In **Austria**, the project “Improving the support services for child victims of trafficking in Austria” was launched at a kick-off meeting held in Vienna on 28 February 2025. The project is co-funded by the European Union via its Technical Support Instrument and the Council of Europe. The purpose of the project is to finalise the concept for setting up a nationwide protection facility for child victims of trafficking and revise the Guidelines on identifying and referring potential victims of child trafficking.

43. In **Bosnia and Herzegovina**, the project supported the development of local Action Plans for implementing the National Strategy for combating trafficking in human beings (2024–2027). Capacity building was strengthened through specialised training for lawyers, judges, prosecutors and professionals working with children in criminal proceedings, as well as through training on financial investigations and victim-centred interviewing.

44. In **North Macedonia**, the project supported capacity building for psychologists, foster care staff, lawyers and NGOs providing legal aid to victims of trafficking. The project also strengthened multi-agency co-operation through a simulation-based training on victim-centred criminal investigations, and contributed to national awarenessraising by organising workshops on access to compensation and on communicating trafficking cases in a victim and gender-sensitive manner.

45. In **Serbia**, the project provided expert support for the development of a comprehensive new Law on the Prevention and Combating of Trafficking in Human Beings and the Protection of Victims. The project further supported specialised training on trafficking for labour exploitation, alongside activities promoting access to legal assistance and free legal aid for victims.

46. In **Malta**, the project resulted in the adoption of a National Anti-Trafficking Strategy (2024-2030) and an accompanying Action Plan. To support the implementation of the Strategy, the project developed key implementation tools, including Theory of Change, Monitoring and Evaluation Framework, Communication Strategy and Action Plan, and Implementation Guidelines. The final conference on the project "Supporting Malta in the design and implementation of a new anti-trafficking strategy" was held on 15 January 2025. In addition, a side event on "Children's participation in the design of child-friendly anti-trafficking tools" was organised on 16 January 2025, highlighting the importance of integrating children's perspectives into initiatives to safeguard their rights and well-being.



Meeting of National Anti-Trafficking Co-ordinators and Rapporteurs, Strasbourg, 11-12 September 2025

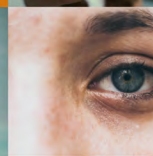
Meeting of National Anti-Trafficking Co-ordinators and Rapporteurs

47. On 11-12 September 2025, a meeting of National Anti-Trafficking Co-ordinators and Rapporteurs was co-organised for the eighth consecutive year by the Council of Europe and the OSCE's Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings. Some 130 participants from 54 Council of Europe member States and OSCE participating States and Partners for Co-operation joined the meeting in Strasbourg and online. The meeting focused on engagement with the private sector in combating human trafficking, crisis-related provisions in National Action Plans for combating human trafficking to enhance preparedness of the national counter-trafficking mechanisms, and links between human trafficking and drugs/forced criminality.

48. During the first session, panellists from the European Union, Bulgaria, Canada, France, Switzerland and the United Kingdom shared reflections on different aspects of the engagement with the private sector in combating human trafficking. The second session started with presentations from the UN Special Rapporteur on trafficking in persons, especially women and children, OSCE, Italy, Türkiye and Ukraine, and continued with discussions in working groups. During the final session, panellists from the OSCE, Belgium, Kyrgyzstan, the Netherlands, Norway and Spain shared data, cases, approaches and challenges in addressing trafficking in human beings for the purpose of forced criminality.

2005 ● 2025

#20Years Against Trafficking



20th anniversary of the adoption of the Council of Europe Convention on Action against Trafficking in Human Beings

49. In 2025, the Council of Europe marked the 20th anniversary of the opening for signature of the Convention on Action against Trafficking in Human Beings, which took place on 16 May 2005 in Warsaw. Fourteen countries signed on day one. Today, all Council of Europe member States have ratified the Convention, making it a powerful and united front against one of the most serious human rights violations. The Convention has become a reference worldwide and remains the Council of Europe's strongest tool to combat human trafficking.

50. As part of the anniversary activities, a dedicated social media campaign was launched around 16 May 2025, using targeted messages and visual content to raise awareness of the Convention's added value and its concrete impact over the past two decades. In a statement published on 16 May 2025, the President of GRETA and the President of the Committee of the Parties to the Convention underlined that, despite the progress achieved, human trafficking remains a pressing threat, fuelled by digital technologies, armed conflicts and deepening inequalities. They called on States Parties to step up their efforts to put in place effective prevention policies, confront new forms of exploitation and keep victims' rights at the heart of every response.



High-level conference “Empowering Change: Technology and Artificial Intelligence in the Fight against Human Trafficking”, Rabat, Malta, 11 June 2025

51. A high-level conference entitled “Empowering Change: Technology and Artificial Intelligence in the Fight against Human Trafficking” took place in Rabat, Malta on 11 June 2025 under the Maltese Presidency of the Committee of Ministers of the Council of Europe. Speaking on the occasion, the Council of Europe Director General of Democracy and Human Dignity, Marja Ruotanen, highlighted that 20 years after its adoption, the Convention’s comprehensive provisions have translated into real progress in national legislation, policies and practice, making a lasting impact on how countries tackle human trafficking. The conference reaffirmed the common will of Council of Europe member States to promote innovative, rights-based responses to human trafficking, in line with the evolving digital landscape. It explored how cutting-edge technologies can support efforts to prevent human trafficking, protect victims, and prosecute perpetrators, while upholding fundamental rights. Panel discussions and workshops focused on the ethical use of AI, securing digital evidence, and fostering cross-sectoral partnerships to strengthen the global response to trafficking in human beings.



High-level conference marking 20 years of the adoption of the Council of Europe Anti-Trafficking Convention and 30 years of La Strada International, Warsaw, Poland, 18 September 2025

52. Further, a high-level conference was organised by the Polish Ministry of the Interior and Administration, the Council of Europe, La Strada International and La Strada Foundation Poland on 18 September 2025, in Warsaw, marking the 20th anniversary of the Convention and the 30th anniversary of La Strada International. Participants underlined persistent challenges, including the rise in human trafficking for the purpose of labour exploitation, the growing number of child victims, low conviction rates and the need for sustained investment in specialised law enforcement and prosecution capacities.



Human trafficking for the purpose of exploitation in criminal activities: victim or perpetrator?

53. Trafficking in human beings for the purpose of exploitation in criminal activities² is a complex crime in which victims are compelled to perform activities that constitute crimes or are considered unlawful. It is often linked to other forms of organised crime such as drug trafficking, property crimes, migrant smuggling, money laundering, document fraud and cybercrime (online scams).

54. The recruitment of children into serious and organised crime has increasingly become a tactic used by criminal networks to avoid detection, investigation and prosecution.³ Children are often lured into organised crime by the promise of financial gain, social status and lifestyle, or sense of belonging. The recruitment of victims of criminal exploitation is often initiated online, via service advertisements, gaming sites and social media. Offenders often fake scenes of opulence and portray a lifestyle to attract young people and groom them to both engage in criminal activities and recruit others. They blackmail their victims by using compromising images, or get them hooked on drugs, thus forcing them to accrue debts. Once young people have engaged with these social media accounts, the exchanges move onto an end-to-end encrypted messaging environment, giving the perpetrators the ability to control victims from a distance. There are increasing reports of children

2. The terms “trafficking for the purpose of exploitation in criminal activities” and “trafficking for forced criminality” are used interchangeably in the literature and refer to situations in which the victims are compelled to commit criminal acts for economic or other gains of traffickers or exploiters.

3. See European Parliamentary Research Service briefing, *Recruitment of minors into organised crime*, June 2025.

being recruited online to commit acts of terrorism (to make bombs or plan violent acts in public places).

55. According to the UN Office for Drugs and Crime (UNODC) Global Trafficking in Persons Report 2024, trafficking for forced criminality ranks third in the number of victims detected globally and has increased from 1% of total victims detected in 2016 to 8% in 2022.⁴ In Western and Southeastern Europe, 22% of all detected victims were trafficked for the purpose of forced criminality, which affects largely children, particularly boys.⁵

56. GRETA's monitoring of the implementation of the Convention shows that trafficking in human beings for the purpose of exploitation in criminal activities is increasing in many State Parties and, according to available statistics, accounts for a growing number of identified victims. At the same time, this form of exploitation is underrepresented - or even missing - in the statistics collected by some State Parties to the Convention.

57. In the **United Kingdom**, about one third of the possible victims referred to the National Referral Mechanism (NRM) in 2021-2024 were subjected to criminal exploitation.⁶ This was the main form of exploitation of child victims, affecting predominantly UK children. A high number of referrals relate to the so-called 'county lines' (2 218 in 2021, 2 416 in 2022, 1 891 in 2023, 1 981 in 2024, and 1 513 in January-September 2025). 'County lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas, using dedicated mobile phone lines or other form of 'deal line'. These gangs often exploit children and vulnerable adults to move - and store - drugs and money, often using coercion, intimidation, violence (including sexual violence) and weapons.⁷

58. In the **Netherlands**, there were 643 presumed victims of human trafficking for forced criminality (i.e. 14% of all presumed victims) in the period 2018-2022.⁸ However, a report by the NGO Centre against child trafficking and human trafficking (CKM) on forced criminality in 13 Dutch municipalities concluded that there might have been up to 2 500 potential victims of trafficking for forced criminality.⁹

59. In **Denmark**, forced criminality accounted for 15% of the identified victims (64 out of 420) in 2020-2024. The authorities reported a trend of criminal networks exploiting Asian men, primarily Vietnamese, for forced criminality, often cultivating cannabis on remote farms.¹⁰

60. In **Croatia**, forced criminality has emerged as the second most common form of exploitation, after sexual exploitation, accounting for nearly a third of the victims of

4. UNODC, Global report on trafficking in persons 2024, available at: https://www.unodc.org/documents/data-and-analysis/glotip/2024/GLOTIP2024_BOOK.pdf

5. Ibid., pp. 169-170.

6. 18 049 victims of criminal exploitation and 7 152 victims of labour and criminal exploitation out of a total of 65 712 possible victims referred to the NRM in 2021-2024. See GRETA's 4th report on the United Kingdom, Appendix 1.

7. See GRETA's 4th report on the United Kingdom, paragraph 13.

8. See GRETA's 3rd report on the Netherlands, paragraph 11.

9. See CKM *Kijken met andere ogen. Deel I: Een landelijke verkenning naar criminele uitbuiting in dertien (middel)grote gemeenten in Nederland* (in Dutch).

10. See GRETA's 4th report on Denmark, paragraphs 14 and Appendix 1.

trafficking identified by the police (31 out of 105 victims) in 2020-2024.¹¹ In **Albania**, forced criminality was the third most frequent form of exploitation, affecting mostly boys (94 out of 672 potential victims identified in 2020-2024).¹² In the Republic of **Moldova**, criminal exploitation accounted for 7% of the identified victims (68 out of 935) in 2020-2024.¹³

61. In other countries, the authorities did not report data indicating an increase in trafficking for the purpose of criminal exploitation. In the **Slovak Republic**, for example, there were only two such cases in 2020-2023, accounting for less than 1% of all presumed victims in this period (207).¹⁴ In **Romania**, this form of exploitation also accounted for less than 1% of identified victims (10 out of 2 662) in the period 2020-2024.¹⁵ In **Georgia**, 1 out of 49 identified victims was trafficked for criminal exploitation in 2020-2024.¹⁶ Similarly, in **Montenegro**, only 1 out of 67 identified victims was subjected to criminal exploitation.¹⁷ In **Malta**, this form of exploitation concerned 5 out of 50 presumed victims in 2021-2025, but none were formally identified as victims of trafficking.¹⁸

62. In countries where criminal exploitation is not specifically mentioned as a form of exploitation in the national definition of human trafficking (e.g. **Austria, Bulgaria, Latvia**), there is no data collected on this form of exploitation as part of the statistics on identified victims. The statistics collected on victims in **Cyprus** include the category “other forms of exploitation”, which covers trafficking for the purpose of criminal exploitation, and the authorities reported that in the period 2020-2024, this form of exploitation concerned 35 out of 1 330 presumed victims and 10 out of 110 identified victims.¹⁹

63. The important differences in the scale of trafficking for the purpose of exploitation in criminal activities across countries suggest that this form of trafficking is not given sufficient attention in all State Parties. Due to a perception bias, criminal exploitation is less likely to be identified as a form of human trafficking than, for example, sexual exploitation. In most State Parties to the Convention, no research has been conducted into the exploitation of adults and children in criminality activities. At the same time, in countries where a significant number of victims are identified, there has been **research** into trafficking for the purpose of criminal exploitation as well as specific **policy and legislative initiatives**. Thus, in the **United Kingdom**, a number of research studies have focused on understanding child criminal exploitation. For example, the Scottish Government commissioned the report “Understanding child criminal exploitation in Scotland” which was published in May 2023. In Northern Ireland, the Department of Justice commissioned research into barriers to the recognition of victims of child criminal exploitation, which was published in June 2025.²⁰

11. See GRETA's 4th report on Croatia, Appendix 1.

12. See GRETA's 4th report on Albania, Appendix 1.

13. See GRETA's 4th report on Moldova, Appendix 1.

14. See GRETA's 4th report on the Slovak Republic, Appendix 1.

15. See GRETA's 4th report on Romania, paragraph 11.

16. See GRETA's 4th report on Georgia, Appendix 1.

17. See GRETA's 4th report on Montenegro, Appendix 1.

18. See GRETA's 4th report on Malta, Appendix 1.

19. See GRETA's 4th report on Cyprus, Appendix 1.

20. See GRETA's 4th report on the United Kingdom, paragraph 43.



FOCUS



UNITED KINGDOM

In July 2024, the Disrupting County Lines Policing Strategy 2024-2027 was launched by the National Police Chiefs' Council and the National County Lines Coordination Centre. It seeks to prevent children and adults from engaging in county lines through measures such as high-visibility hot-spot patrols and community engagement, as well as use of civil and criminal orders to prevent reoffending²¹. Further, the UK authorities are funding the NGO Catch22, a specialist support and rescue service for young people who are criminally exploited. In Northern Ireland, a two-year Child Criminal Exploitation Action Plan was adopted in 2023, a Child Exploitation Toolkit was developed for professionals, and a full-time Child Criminal Exploitation Professional Officer was appointed in August 2024 in order to work with relevant stakeholders on the issue. Further, the Executive Programme on Paramilitarism and Organised Crime has been operating since 2016 to address issues associated with paramilitarism, including risks of criminal exploitation of children and young people and links with human trafficking. To improve the protection of vulnerable children and young people, legislative initiatives were introduced by the UK government, namely the Crime and Policing Bill which introduces a criminal offence of child criminal exploitation, makes grooming a statutory aggravating factor of criminal offences, and creates a civil preventive order in cases of child criminal exploitation.

64. The ongoing 4th round of evaluation of the implementation of the Convention focuses on **vulnerabilities to human trafficking**. GRETA's reports highlight situations in which particular vulnerabilities are abused by traffickers to exploit victims for the purpose of committing criminal acts. For example, in **Latvia**, homeless people, most of whom are men with severe substance use disorders or alcohol addiction, are frequently targeted, exploited in financial fraud schemes through the misuse of their personal documents or coerced into committing criminal offences.²² In **Croatia**, there have been investigations involving children residing in an institution for children experiencing behavioural challenges, who were exploited by older children to steal and hand over the profits from the stolen goods to them. In another case, the defendants forced the victim, who had a drug addiction, to steal and sell drugs for them.²³

21. [Disrupting County Lines Policing Strategy 2024-2027](#), National County Lines Coordination Centre (NCLCC).

22. See GRETA's 4th report on Latvia, paragraph 94.

23. See GRETA's 4th report on Croatia, paragraphs 37 and 135.

65. In **Norway**, research on the vulnerability of children to human trafficking was conducted by in 2022 by the Institute for Social Research.²⁴ According to the report, children and young people who become entangled in coercion and dependency relationships through drug-related crime, (threats of) forced marriage or sexual abuse, rarely have their cases assessed as potential human trafficking. The study argues that a broader approach to the exploitation dynamics in these cases, where coercion, violence and dependency are part of the picture, could provide a more consistent and knowledge-based foundation for government efforts. A growing concern is child criminal exploitation. Several police districts have seen an increase in the recruitment of children into criminal networks, in particular in neighbourhoods with a high percentage of vulnerable youth.²⁵

66. In 2018-2019, large-scale cases of human trafficking involving **online scams** were detected in **Croatia, Montenegro** and **Slovenia**. The victims were recruited in Taiwan and arrived on tourist visas. They were held captive in rented houses, their travel documents were confiscated, and they were trained to use different web-based applications in order to call at random Chinese citizens, pretending to be law enforcement officers, informing them that they had illegal content on their computers or phones and offering to drop the charges if they paid money. Following a police action in Montenegro on 8 January 2020, eight suspects, members of an organised criminal group, were arrested; 84 persons were presumed to be victims of human trafficking, of whom 37 (12 women and 25 men) were formally identified as victims. In January 2020, criminal charges were filed against eight persons for the offences of creating a criminal organisation and trafficking in human beings. A financial investigation was carried out and assets found in Montenegro were seized. The prosecution was handed over to the competent prosecutor's office in Taiwan, given that both the accused and the injured parties were citizens of Taiwan.²⁶ In Croatia, an investigation was carried out in 2018 and 59 women and men from Taiwan were identified as victims of trafficking; two suspects from Taiwan and two from China were convicted in Croatia.²⁷ In Slovenia, the police identified 32 victims from Taiwan; in 2020 the perpetrators, who originated from Slovenia and Taiwan, were convicted of the offence of human trafficking for the purpose of forced criminality, with the highest penalty being four years' imprisonment and a fine of 10 000 Euro.²⁸ As the victims were coerced to commit fraud, no criminal charges were brought against them.

67. Trafficking for the purpose of exploitation in criminal activities is directly related to the application of the **non-punishment provision**, enshrined in Article 26 of the Convention. Pursuant to it, Parties shall provide for the possibility of not imposing penalties on victims of trafficking in human beings for their involvement in unlawful activities, to the extent that they have been compelled to do so. The aim of the protection provided by Article 26 is to safeguard the human rights of victims and to avoid further victimisation. GRETA has stressed that the criminalisation of

24. Hilde Lidén, Children, human trafficking, and related forms of exploitation (Barn, menneskehandel og nærliggende utnyttingsformer), Institute for Social Research, September 2022.

25. [Politiets trusselvurdering 2025 \(Police threat assessment 2025\)](#).

26. See GRETA's 3rd report on Montenegro, paragraph 91.

27. See GRETA's 3rd report on Croatia, paragraph 91.

28. See GRETA's 3rd report on Slovenia, paragraphs 88 and 100.

victims of human trafficking contravenes the State's obligation to provide services and assistance to victims because, not being treated as victims of human trafficking, they are not provided with the support and services to which they are entitled under the Convention. Furthermore, such criminalisation discourages victims from coming forward and co-operating with law enforcement agencies, thereby also interfering with the State's obligation to investigate and prosecute those responsible for human trafficking offences.²⁹

68. The requirement that victims have been "compelled" to be involved in unlawful activities is interpreted in light of the definition of trafficking in human beings. "Compulsion" includes all the illicit means referred to in Article 4 of the Convention. As noted in the paper on the non-punishment provision issued by the Office of the OSCE Special Representative and Co-Ordinator for Combating Trafficking in Human Beings in 2013, "being 'compelled' to commit a crime includes the full array of factual circumstances in which victims of trafficking act without autonomy because traffickers exercise control over them through abusive, coercive and illicit means, including abuse of power or of a position of vulnerability."³⁰ In the case of children, no means are required to establish that a child has been trafficked. It is also immaterial whether or not the child has consented to be exploited.³¹

69. GRETA notes that there are tensions between fighting crime and the protection of victims of human trafficking, which result in failure to apply the non-punishment provision. A key challenge is to find the right balance between the competing interests of victim protection and law enforcement.³²

70. **Prompt identification** of presumed victims of human trafficking is a precondition for applying the non-punishment principle. As a result of failure to carry out identification, victims of trafficking are frequently arrested, detained and/or deported for unlawful activities, such as shoplifting, drug cultivation or distribution, or immigration related offences. Prosecuting and punishing victims identifies them as the wrongdoers, rather than as victims of exploitation. Criminalisation and the experience of imprisonment and deportation can lead to secondary victimisation of trafficked persons, exacerbated by shame, powerlessness and the sense of injustice.

71. As part of the assessment of the implementation of the non-punishment principle, GRETA's country evaluation reports refer to situations in which victims of trafficking for the purpose of exploitation in criminal activities were prosecuted and convicted. For example, in **Austria**, GRETA noted that according to NGO representatives, the application of the non-punishment principle to children should be urgently reviewed as a number of children arrested for drug-trafficking, pickpocketing or burglary are convicted without due attention being paid to their possible exploitation and trafficking.³³ Similarly, in **Albania**, GRETA noted that there had

29. See [2nd General Report on GRETA's activities](#) (2012), paragraph 58.

30. OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, *Policy and legislative recommendations towards the effective implementation of the non-punishment provision with regard to victims of trafficking* (2013), paragraph 70.

31. [Explanatory report to the Convention](#), paragraphs 98 and 273.

32. Marija Jovanović, Maayan Niezna, *Non-Punishment of Victims/Survivors of Human Trafficking in Practice: A Case Study of the United Kingdom*, Council of Europe, September 2023, page 17.

33. See GRETA's 4th report on Austria, paragraph 179.

been reports of potential child victims being prosecuted and convicted for drug trafficking.³⁴ In **Belgium**, GRETA noted that children forced to commit offences are rarely identified as victims of trafficking.³⁵ In **France**, 94% of the victims of exploitation for the purpose of forced criminality assisted by NGOs in 2024 were prosecuted for acts committed within the context of their exploitation, and 76% of them had been convicted at least once.³⁶

72. A report by La Strada International on the application of the non-punishment provision refers to a case in **Denmark** in which the non-punishment provision was not applied due to delayed victim identification.³⁷ The victim was trafficked for the purpose of criminal activities, convicted for possessing drugs, sentenced to imprisonment, and issued both a six-year entry ban and a deportation order. The victim remained in prison for eight months and after being identified, accepted a voluntary return to his country of origin. The NGO that assisted him expressed serious concerns about the high risk of retaliation from the criminal organisation that trafficked him upon his return.³⁸ GRETA was informed that, even when information that victims were compelled to commit unlawful acts as a result of being trafficked comes to light during trial, no efforts are made by the police or prosecution to look for evidence that they were trafficked and to ensure the application of the non-punishment provision.

73. In **Romania**, the previously mentioned report by La Strada International refers to a case in which the non-punishment provision was correctly applied by the Romanian judicial authorities. A trafficking network forced several persons to beg, steal and engage in prostitution in Austria, using their identities for fraud. Six persons were convicted in Austria but were later identified as trafficking victims in Romania. A Romanian prosecutor co-operated with the Austrian authorities to clear their criminal records and compensate the victims who had been punished.³⁹

74. GRETA has repeatedly called upon the authorities of States Parties to enhance efforts to identify victims of human trafficking earlier in the process, and in any event before such victims have already been convicted of offences they were compelled to commit. GRETA has also stressed that convictions should be reversed and criminal records erased in an expedient manner when clear evidence subsequently emerges that a crime was committed as a direct consequence of being a victim of trafficking.⁴⁰

75. Reference is made to the case *V.C.L. and A.N. v. United Kingdom*, in which the European Court of Human Rights found the UK in breach of Article 4 (prohibition of slavery, servitude and forced or compulsory labour) and Article 6 (right to a fair trial) of the European Convention on Human Rights for failing to identify and consider the protection needs of two Vietnamese children who were prosecuted and convicted

34. See GRETA's 4th report on Albania, paragraph 146.

35. See GRETA's 3rd report on Belgium, paragraph 119.

36. See *La traite des êtres humains en France : le profil des victimes accompagnées par les associations en 2024*, page 28.

37. <https://documentation.lastradainternational.org/doc-center/3588/non-punishment-report>, accessed 15 January 2025.

38. See GRETA's 4th report on Denmark, paragraph 185.

39. See GRETA's 4th report on Romania, paragraph 178.

40. See GRETA's 3rd report on France, paragraph 136.

of drug offences despite credible suspicion they were victims of human trafficking.⁴¹ The judgment emphasizes the importance of the non-punishment principle for states' compliance with the positive obligation to protect victims or potential victims of human trafficking enshrined in Article 4 of the ECHR. It states that it is "axiomatic that the prosecution of victims of trafficking would be injurious to their physical, psychological and social recovery and could potentially leave them vulnerable to being re-trafficked in future." The ruling highlights the importance of distinguishing between two separate but interconnected decisions. The first is a decision on whether or not an individual suspected of having committed a criminal offence is a victim of human trafficking. The second decision concerns the relevance of such status for initiating or continuing the prosecution of an individual in question.⁴²

76. Article 26 of the Convention requires States Parties to "provide for the possibility of not imposing penalties on victims for their involvement in unlawful activities". This legal obligation is expressed in a mandatory language, which requires States to adopt measures that specifically deal with the non-punishment of victims of trafficking. As noted in the Explanatory Report to the Convention, to comply with this obligation under Article 26, Parties can incorporate in their internal law a substantive criminal or procedural criminal law provision or adopt any other measure, allowing for the possibility of not punishing victims of trafficking in human beings. This does not mean that the principle ought to be applied in every situation where a victim of human trafficking has been found to have been involved in unlawful activities. In other words, the obligation contained in the relevant international instruments is an obligation of means, not of result. This calls for establishing clear and specific rules about when and how this principle ought to apply.⁴³

77. GRETA has stressed that the non-punishment provision should be capable of being applied to all offences that victims of human trafficking were compelled to commit. Providing for exceptions on a case-by-case basis, based on the principle of proportionality, rather than excluding *per se* all victims who have committed certain offences, could achieve the same result.

78. In some countries, **the non-punishment principle is limited in scope**, i.e. applicable only to certain unlawful acts. For example, the **United Kingdom** Modern Slavery Act 2015 introduced a statutory defence (section 45) that allows adults and children to argue a legal defence if they are charged with offences they were forced to commit. However, there is a list of more than 100 offences of various degrees of seriousness where the statutory defence cannot be used.⁴⁴ In Northern Ireland, the Human Trafficking and Exploitation Act was amended in 2022 to allow the statutory defence to apply in cases of drug offences.

41. *V.C.L. and A.N. v. United Kingdom*, applications nos. 77587/12 and 74603/12, final judgment of 5 July 2021.

42. Marija Jovanović, Maayan Niezna, Non-Punishment of Victims/Survivors of Human Trafficking in Practice: A Case Study of the United Kingdom, Council of Europe, September 2023, page 25.

43. *Ibidem*, p. 21.

44. UK Modern Slavery Act 2015, Schedule 4, Offences to which defence in section 45 does not apply.

79. In the **Slovak Republic**, Article 40, paragraph 2, of the Criminal Code was amended to cover not only minor offences, but all offences committed by a person under duress due to the fact that they were a victim of human trafficking.⁴⁵

80. The non-punishment principle applies not only to criminal liability but also to administrative and other types of liability. Following a recommendation made by GRETA, in **Latvia** the scope of the non-punishment provision was extended to cover also administrative offences.⁴⁶

81. There may be grey areas where victims were first exploited by traffickers and then moved up the criminal gang hierarchy to become themselves exploiter. In the **United Kingdom**, GRETA noted that children are reportedly often denied the statutory defence on the grounds that they consented to committing the offence and are not in a situation of exploitation, insufficient attention being paid to the issue of debt bondage that may force them to commit criminal offences. In a judgment of 2023, the Court of Appeal of England and Wales overturned the decision of a crown court to refuse the statutory defence on the grounds that the children had not been compelled to commit the offence, recalling that compulsion is not an element of the statutory defence for children.⁴⁷

82. GRETA has stressed that the absence of a **specific provision on the non-punishment** of victims of trafficking entails a risk of differential treatment, depending on the prosecutor in charge of the case. Moreover, trafficking victims often cannot rely on exceptions based on general criminal law provisions (for example duress, necessity) because these concepts are narrower in scope than the non-punishment principle enshrined in the Convention and/or shift the burden of proof to the victim of trafficking.

83. In the **Netherlands**, civil society representatives noted that the absence of a specific legal provision of the non-punishment of victims of human trafficking created legal uncertainty and resulted in many victims of trafficking for the purpose of forced criminality being afraid to co-operate with the police due to fear of being prosecuted and/or reprisals from the traffickers.⁴⁸ A study by the NGO Centre against child trafficking and human trafficking (CKM) found that the Prosecutor's Office rarely applied the non-punishment principle to dismiss criminal proceedings against victims of human trafficking.⁴⁹

84. To ensure compliance with the non-punishment provision, GRETA has recommended to States Parties to adopt a specific legal provision on the non-punishment of victims of trafficking for their involvement in unlawful activities, to the extent that they were compelled to do so, and/or to develop detailed, updated guidance for police officers and prosecutors on the aims and scope of the non-punishment provision.

45. See GRETA's 4th report on the Slovak Republic, paragraph 190.

46. See GRETA's 3rd report on Latvia, paragraph 97.

47. See GRETA's 4th report on the United Kingdom, paragraph 248.

48. See GRETA's 3rd report on the Netherlands, paragraph 101.

49. <https://www.hetckm.nl/mediadepot/30804217deb0/CKM-Kijkenmetandereogendeel22022.pdf>, page 26.

85. Of the 47 State Parties to the Convention which have been evaluated by GRETA, at the time of the last evaluation, 22 had specific legal provisions concerning the non-punishment of victims of trafficking (i.e. 47%).⁵⁰ The number of such countries has increased following recommendations made by GRETA. Thus, after the first evaluation by GRETA, six State Parties adopted specific legal provisions concerning the non-punishment of victims of trafficking (Albania, Bosnia and Herzegovina, Bulgaria, Latvia, the Slovak Republic and the United Kingdom). Between the second and the third evaluations, four more countries adopted such provisions (Andorra, Belgium, Montenegro and North Macedonia).

86. In **Poland** and **Serbia**, which do not have a specific legal provision on the non-punishment provision, GRETA was informed that prosecutors directly invoked Article 26 of the Convention to drop criminal charges against a victim of human trafficking.⁵¹

87. In **Italy**, with judgment No. 2319 of 18 January 2024, the Court of Cassation ruled in favour of the victim, establishing she shall not be punished in a case where she was charged with drug trafficking, and referring to GRETA's 2nd report on Italy, which had urged the Italian authorities to ensure full implementation of Article 26 of the Convention through training, regulatory measures and legislative reforms.⁵²

88. Legislative measures alone are not sufficient; they must be supported by a comprehensive strategy including **guidance and training** for law enforcement officers, judges and prosecutors. In many countries, GRETA noted that police officers, prosecutors and judges were inadequately trained to identify victims of trafficking, and consequently there was a risk of prosecuting and convicting them for offences committed while they were being trafficked. To ensure effective implementation of the non-punishment provision, GRETA has recommended the development of guidance and training for law enforcement officers, prosecutors and judges on the scope and application of the non-punishment provision.

89. In a number of countries (e.g. Austria, Belgium, Croatia, Denmark, Montenegro, Netherlands, Norway, Serbia, Spain, United Kingdom), **guidance on the application of the non-punishment provision** has been developed for prosecutors and law enforcement agencies.

90. Further, some countries have appointed **prosecutors who monitor cases** where accused persons might be victims of trafficking with a view to ensuring the application of the non-punishment provision.

50. Albania, Andorra, Armenia, Azerbaijan, Belarus, Belgium, Bosnia and Herzegovina, Bulgaria, Cyprus, Finland, Germany, Georgia, Greece, Latvia, Lithuania, Luxembourg, Malta, North Macedonia, Romania, Slovak Republic, Spain, United Kingdom.

51. See GRETA's 2nd report on Poland, paragraph 174, and GRETA's 3rd report on Serbia, paragraph 117.

52. See [Corte Suprema di Cassazione - Sentenza Numero: 2319, deposito del 18 gennaio 2024](#).



FOCUS



ITALY

The District Prosecutor's Office at the Juvenile Court in Abruzzo (Italy) launched, at the end of 2023, an initiative aimed at prioritising the early identification of juvenile offenders as vulnerable victims, either already exploited or at risk of exploitation⁵³. A multi-agency approach was adopted, involving all stakeholders who come into contact with the juvenile justice system: the Prosecutor's Office and the Juvenile Court, the Department of Juvenile Justice of the Ministry of Justice, the judicial social services, municipal social services, all reception centres for unaccompanied or separated children and refugees, law enforcement agencies, lawyers, legal guardians and the regional anti-trafficking NGO On the Road. This broad network of actors was formalised through the signing of a protocol, with the goal of identifying and implementing appropriate actions to achieve the initiative's objectives. Depending on the specific circumstances, the investigative approach can be adjusted, the assessment of the child pursuant to Articles 6 and 9 of the Italian Juvenile Criminal Procedure Law can be brought forward, and actions can be more precisely targeted. It may be possible to fully evaluate the child's criminal responsibility, to determine the existence of a statutory defence (such as the state of necessity) in cases where the child offender is, in fact, a trafficking victim, and to ensure effective co-ordination with other ordinary judicial authorities investigating the criminal group, making the competent judge fully aware of the child's overall background. Similarly, in civil proceedings, full awareness of the child's vulnerabilities may guide the adoption of the most appropriate protective measures, including within reception centres, by activating psycho-social, health and educational services proportionate to the child's needs and to the trauma they may have experienced, particularly in the case of unaccompanied or separated children. At the same time, professionals were specifically trained on the importance of reporting, within the network, situations that may present elements corresponding to the indicators. A working group set up a list of specific indicators related to potential cases of child trafficking for forced criminality. In addition, targeted training activities were conducted within individual reception centres, with the participation of unaccompanied children hosted in those centres. The aim was to raise children's awareness of their rights and to equip them with concrete tools and resources to recognise and avoid potentially dangerous situations.

91. In the context of the 4th evaluation round of the Convention, GRETA is paying particular attention to the awareness of staff working in **prisons and immigration detention facilities** to the issue of human trafficking, due to the fact that some victims

53. Centro per la Giustizia Minorile per il Lazio, l'Abruzzo e il Molise - "Protocollo d'intesa per l'identificazione et la presa in carico dei minori vittime di tratta e di sfruttamento".

of trafficking might be detained as a result of failure to carry out the identification procedure and apply the non-punishment principle, and the identification of victims of human trafficking in places of detention. The questionnaire for the 4th evaluation round contains the following question: “What detection measures are taken in your country to identify victims of THB in immigration detention centres and prisons?”

92. In the **United Kingdom**, a series of measures have been taken by His Majesty’s Prison and Probation Service (HMPPS) to improve the identification of victims in prisons in England and Wales, following a request for judicial review initiated by the NGO ATLEU. These include the publication, in February 2023, of Modern Slavery Guidance for prison staff and prisoners, as well as modern slavery needs assessment.⁵⁴ The HMPPS has also established a dedicated team at the central level to provide ongoing support to prison staff on modern slavery issues, and Modern Slavery Single Points of Contact in all 122 prisons in England and Wales. In addition, The Salvation Army has delivered training for prison staff on identifying signs of human trafficking and the initiation of the NRM process. According to interlocutors met by GRETA, these measures have led to positive results, with 368 suspected victims of trafficking detected in prisons of England and Wales between March 2023 and June 2024. Work is ongoing to extend efforts to probation services. In Scotland, the NGO Survivors of Human Trafficking in Scotland is working with prison staff to improve the identification of victims, and in Northern Ireland, the anti-trafficking NGO Flourish has intervened in prisons to support vulnerable persons.⁵⁵

93. In **Malta**, since 2021, the staff of the Correctional Services Agency have identified two presumed victims of human trafficking amongst prisoners. One of them concerned a woman convicted of drug importation. The second case concerned a foreign woman convicted of trafficking for sexual exploitation, who disclosed to prison staff that she had been coerced by her husband into committing the offence. Both women received support from prison social workers and psychologists and were offered assistance in contacting a lawyer. However, they remained in prison until the completion of their sentences.⁵⁶

94. The low number of identified victims of THB for the purpose of forced criminality is noted in **Finland’s** National Action Plan, which refers to a 2020 study on women prisoners conducted by the Criminal Sanctions Agency, according to which several women who may have been compelled to commit crimes while being victims of human trafficking were identified in Finnish prisons.⁵⁷

95. In **Italy**, according to information received from the National Guarantor of the Rights of Persons Deprived of Liberty in February 2023, 13 imprisoned women were potentially victims of trafficking.⁵⁸

96. GRETA notes that the identification of victims of human trafficking in places of deprivation of liberty requires the provision of training and guidance to staff working in such places on identifying signs of human trafficking and referring victims to identification and appropriate assistance. GRETA also stresses the importance of enabling specialised NGOs to have access to detention facilities and being involved in the identification of victims of trafficking.

54. Available at: <https://www.gov.uk/government/publications/modern-slavery-guidance>.

55. See GRETA’s 4th report on the United Kingdom, paragraphs 130-132.

56. See GRETA’s 4th report on the Malta, paragraph 85.

57. Venla Roth and Mia Luhtasaari, *Action Plan against Trafficking in Human Beings*, 2021, page 19.

58. See GRETA’s 3rd report on Italy, paragraph 125.



37th Meeting of the Committee of the Parties, Strasbourg, 18 December 2025

Relations with the Committee of the Parties

97. GRETA and the Committee of the Parties represent the two pillars of the monitoring system set up by the Convention. According to Article 38, paragraph 7, of the Convention, the Committee of the Parties may adopt, on the basis of GRETA's reports and conclusions, recommendations addressed to the Parties concerning the measures to be taken to implement GRETA's conclusions, if necessary, setting a date for submitting information on their implementation, and aiming at promoting co-operation with the Party concerned for the proper implementation of the Convention. The purpose of this provision of the Convention is to strengthen the implementation of GRETA's conclusions.

98. The Committee of the Parties has continued to hold regular exchanges with the President of GRETA. Such exchanges are an opportunity to present GRETA's ongoing work, highlight the main findings from country evaluations, and clarify the content of certain substantive obligations under the Convention.

99. At its **36th meeting** (20 June 2025), the Committee of the Parties considered GRETA's reports on Liechtenstein and Ukraine under the third evaluation round of the Convention, and on Albania, Austria, Croatia, Cyprus, the Republic of Moldova and the Slovak Republic under the fourth evaluation round, and on the basis of them adopted recommendations addressed to the national authorities. The Committee also considered the reports submitted by the authorities of Azerbaijan, North Macedonia and Poland on measures taken to comply with the Committee's recommendations. At its **37th meeting** (18 December 2025), the Committee of the Parties adopted recommendations concerning Bulgaria, Denmark, Georgia, Montenegro and Romania based on GRETA's fourth round evaluation reports. The Committee also considered the reports submitted by the governments of the Czech Republic, Iceland, Serbia, Slovenia, Spain, Sweden and Türkiye on measures taken to comply with the recommendation issued by the Committee concerning these countries.



Human Rights Building, Strasbourg, France

Co-operation with other Council of Europe bodies

European Court of Human Rights

100. GRETA's monitoring of the implementation of the Convention contributes to preventing violations of the European Convention on Human Rights (ECHR), including Article 4, which prohibits slavery, servitude and forced or compulsory labour and includes within its scope trafficking in human beings. In selected cases, GRETA makes third-party interventions to the European Court of Human Rights, which address the general principles applicable to the determination of the case from the perspective of Convention on Action against Trafficking in Human Beings.

101. The most recent case in which GRETA submitted a third-party intervention to the Court is *I.C. v. the Republic of Moldova* (application No. 36436/22).⁵⁹ In a judgment delivered on 27 February 2025, the Court found that the Moldovan authorities' failure to protect an intellectually disabled woman from labour exploitation and sexual abuse, and to effectively investigate her allegations, amounted to breaches of Articles 3 (prohibition of inhuman or degrading treatment), 4 (prohibition of forced labour), 8 (right to respect for private and family life), and 14 (prohibition of discrimination) of the ECHR. The case concerned a Moldovan woman with an intellectual disability who had lived in State care until in 2013 she was taken by a couple to live on their farm. She alleged that the couple had forced her to work on the farm without pay and that the owner of the farm had repeatedly sexually abused her. After escaping

59. *I.C. v. the Republic of Moldova* (application No. 36436/22).

in 2018, she contacted an NGO who helped her lodge a complaint with the police. Criminal cases were opened in relation to charges of rape, sexual abuse and human trafficking, but the ensuing criminal proceedings led to the acquittal of the couple who owned the farm. The Court found that the framework concerning the removal from State care of people with intellectual disabilities who had been deprived of their legal capacity and its implementation in practice had failed to provide effective protection from trafficking and/or other forms of treatment contrary to Article 4 of the ECHR. It also held that there had been a further violation of Article 4 as concerned the investigation into the applicant's allegations, in particular a failure to follow up on some obvious lines of inquiry. Further, the Court found that the authorities had had a discriminatory attitude towards the applicant as a woman with an intellectual disability. The judgment highlights the State's obligation to put in place an appropriate legislative and administrative framework and to take protective measures against human trafficking of persons with intellectual disabilities, as well as to conduct effective investigations into allegations of human trafficking made by vulnerable victims.

102. As noted in paragraph 7, at its 54th meeting, GRETA had an exchange of views with Judge Davor Derenčinović and Judge Maria Elosegui from the European Court of Human Rights. The judges explained the Court's approach to the investigative obligations under Article 4 of the ECHR, emphasising that investigations must be thorough and that a breach of thoroughness can occur when the authorities fail to show due diligence, such as not questioning key witnesses, failing to regularise victims' immigration status, over-relying on the testimonies of the accused, using outdated information and evidence, providing no justification for not opening a criminal case or failing to co-operate with the authorities of other States. Other issues of discussion included the requirement of promptness in investigations under Article 4 of the ECHR, the limits of prosecutorial discretion in qualifying crimes, and the concept of vulnerability in the Court's case-law.

Other Council of Europe bodies

103. On 26 March 2025, the **Congress of Local and Regional Authorities of the Council of Europe** adopted a resolution and a recommendation aimed at stepping up the fight against trafficking in human beings for labour exploitation.⁶⁰ It emphasises the key role of local authorities and calls on the Committee of Ministers to encourage member states to develop national anti-trafficking actions and strategies in consultation with local and regional authorities and their associations and by providing clear guidance on the implementation of new actions.

104. GRETA has maintained contacts with the **Parliamentary Assembly of the Council of Europe (PACE)**, in particular with the Committee on Migration, Refugees and Displaced Persons and the Committee on Equality and Non-Discrimination. On 8 December 2025, David Mancini, member of GRETA, took part in an exchange of views with PACE's Committee Migration, International Protection and Economic Cooperation (MIG) on the role of the Council of Europe in implementing the European Pact on Migration and Asylum.

60. <https://go.coe.int/5RAff>

105. On 6 March 2025, Antoaneta Vassileva, 1st Vice-President of GRETA, and Petya Nestorova, Executive Secretary of the Council of Europe Convention on Action against Trafficking in Human Beings, participated in an online exchange of views with the Committee of the Parties to the Convention on the protection of children against sexual exploitation and sexual abuse (**Lanzarote Committee**).

106. On 21 January 2025, the Executive Secretary of the Convention took part in the 4th meeting of the **Consultation Group on the Children of Ukraine (CGU)**.⁶¹ The discussion focused on how to ensure effective follow-up of the report “Understanding the risks of human trafficking on children of Ukraine”, published in October 2024.

61. [Consultation Group on the Children of Ukraine](#)



Co-operation with other intergovernmental organisations

107. Co-operation, strong partnerships and co-ordinated action are the keys to the success of anti-trafficking action. GRETA has continued developing links and forging partnerships with international organisations active in the area of combating trafficking in human beings. The country evaluation visits were an opportunity to meet representatives of international organisations present in the respective countries. Further, members of GRETA and the Secretariat participated in events organised by other international organisations, at which they presented the Convention and GRETA's work (see Appendix 9).

United Nations

108. On 28 February 2025, GRETA made a submission pursuant to the invitation for input for the report of the UN Secretary-General on progress made in the implementation of General Assembly resolution A/RES/78/228 on "Improving the co-ordination of efforts against trafficking in persons".

109. GRETA was represented at a number of events organised by UN institutions during the reporting period. On 18 June 2025, the Executive Secretary of the Convention participated online to the UNODC Regional Expert Group Meeting "Hidden Victims, Visible Crimes: Addressing Forced Criminality in Human Trafficking Cases in South Eastern Europe". Further, she took part in the Regional Conference "Enhancing Cross-Border Co-operation of National Referral Mechanisms to Address Trafficking in Persons in Contexts of Displacement and Mixed Migration Flows", co-organised, on 12 November 2025, by UNODC, the National Commission for Combating Trafficking in Human Beings of North Macedonia and the Ministry of Foreign Affairs of Sweden.

Inter-Agency Co-ordination Group against Trafficking in Persons (ICAT)

110. The Council of Europe is a partner of the Inter-Agency Co-ordination Group against Trafficking in Persons (ICAT). GRETA's Secretariat participated in ICAT Focal Points Meetings and contributed to the preparation of ICAT issue briefs, ensuring that the Convention's standards and GRETA's work are duly reflected. Further, the Executive Secretary of the Convention took part in the ICAT Annual Principals' meeting on 3 December 2025.

111. On 29 July 2025, on the occasion of the World Day against Trafficking in Persons, GRETA joined ICAT in calling upon States and relevant stakeholders to integrate anti-trafficking efforts into broader strategies addressing organised crime.

OSCE/ODIHR

112. Action against trafficking in human beings has been one of the four priority areas of co-operation between the Council of Europe and the OSCE. Pursuant to the agreement reached at a meeting held in June 2010 in Paris, co-operation between the Council of Europe and OSCE in the field of action against trafficking in human beings focuses on: (i) awareness raising and advocacy; (ii) capacity building and assistance to governmental and non-governmental actors, and (iii) conducting assessments and monitoring and providing recommendations. The OSCE has observer status with the Committee of the Parties to the Council of Europe Anti-Trafficking Convention.

113. Building on the positive outcomes of the multi-year partnership, the OSCE and GRETA continued to co-organise annual meetings of National Anti-Trafficking Co-ordinators and Rapporteurs while rotating the hosting role. The 2025 meeting hosted by Council of Europe took place on 11-12 September 2025 in Strasbourg (see paragraph 47).

114. Further, high-level talks were organised jointly by GRETA and the OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings with the authorities of Sweden (on 10 September 2025) and Iceland (on 1 October 2025).

115. Members of GRETA and its Secretariat regularly participate in conferences and other events organised by the OSCE. At the OSCE's 25th Alliance against Trafficking in Persons Conference, which focused on child trafficking, the Council of Europe organised a side-event on preventing trafficking and online exploitation among displaced children from Ukraine.

116. Moreover, GRETA and the OSCE, particularly through its Office for Democratic Institutions and Human Rights (ODIHR), collaborate on promoting ethical survivor engagement in anti-trafficking efforts and building the capacities of States in this respect. ODIHR supported the participation of two members of the International Survivors of Trafficking Advisory Council (ISTAC) in the activities and the final conference of the project "Supporting Malta in the Design and Implementation of a New Anti-Trafficking Strategy" (see paragraph 46).

117. During country evaluation visits, GRETA delegations met representatives of local offices of the OSCE (where they have Field Operations and anti-trafficking Focal Points) and benefited from their presence on the ground to complete the collection of information necessary for monitoring the implementation of the Convention.

European Union

118. GRETA has continued to engage with the EU Anti-Trafficking Co-ordinator and members of her Office in the context of different activities.

119. GRETA First Vice-President, Antoaneta Vassileva, and the Executive Secretary of the Convention participated in the High-level Conference “Strengthening synergies: advancing cross-border strategies to combat labour exploitation”, co-organised by the European Labour Authority (ELA), Bulgaria’s Ministry of Labour and Social Policy and Bulgarian National Commission for Combating Trafficking in Human Beings, on 10 October 2025 in Sofia.



Co-operation with civil society

120. The Convention provides for co-operation and building strategic partnerships with civil society, which can help governments fulfil their obligations under the Convention (Article 35). In its country reports, GRETA has emphasised the need to adopt an inclusive approach and develop formal and systematic consultation between governmental and non-governmental actors involved in anti-trafficking action. Civil society, including trade unions, should be involved in the development and implementation of anti-trafficking measures and their evaluation. Further, GRETA has called for the involvement of specialised NGOs in a multi-agency effort to identify and protect victims of trafficking.

121. In the course of 2025, international and national NGOs continued to provide information to GRETA in the context of the preparation of country evaluation visits and reports. Furthermore, NGOs provided feedback to GRETA on the follow-up given to its reports. GRETA is grateful for the contributions made by NGOs to its monitoring work and is committed to continuing the existing co-operation with civil society.

122. Members of GRETA and the Secretariat participated in a number of events organised by civil society organisations (see Appendix 9). By way of example, on 5 June 2025, la Dadunashvili participated in a conference of the Austrian Platform against Human Trafficking in Vienna, Austria. Further, David Mancini spoke at a seminar on trafficking in human beings organised by the Portuguese Family Planning Association (APF) on 14 November 2025. The Executive Secretary of the Convention spoke online at the conference “Gender-sensitive approaches to combating human trafficking in the EU: strengthening support for asylum-seeking women and girls in Europe”, organised by France terre d’asile on 23 May 2025.

Appendix 1

Chart of signatures and ratifications
of the Council of Europe

Convention on Action against
Trafficking in Human Beings

Status as of 31/12/2025

Title	Council of Europe Convention on Action against Trafficking in Human Beings
Reference	CETS No.197
Opening of the treaty	Warsaw, 16/05/2005 – Treaty open for signature by the member states, the non-member states which have participated in its elaboration and by the European Union, and for accession by other non-member states
Entry into Force	01/02/2008 – 10 Ratifications, including 8 member states

	Signature	Ratification	Entry into Force	Notes	R.	D.	A.	T.	C.	O.
Albania	22/12/2005	6/2/2007	1/2/2008							
Andorra	17/11/2005	23/3/2011	1/7/2011							
Armenia	16/5/2005	14/4/2008	1/8/2008							
Austria	16/5/2005	12/10/2006	1/2/2008							
Azerbaijan	25/2/2010	23/6/2010	1/10/2010					T.		
Belgium	17/11/2005	27/4/2009	1/8/2009							
Bosnia and Herzegovina	19/1/2006	11/1/2008	1/5/2008							
Bulgaria	22/11/2006	17/4/2007	1/2/2008							
Croatia	16/5/2005	5/9/2007	1/2/2008							
Cyprus	16/5/2005	24/10/2007	1/2/2008							O.
Czech Republic	2/5/2016	29/3/2017	1/7/2017		R.					
Denmark	5/9/2006	19/9/2007	1/2/2008		R.			T.		
Estonia	3/2/2010	5/2/2015	1/6/2015		R.					
Finland	29/8/2006	30/5/2012	1/9/2012		R.					
France	22/5/2006	9/1/2008	1/5/2008		R.	D.				
Georgia	19/10/2005	14/03/2007	1/2/2008			D.				
Germany	17/11/2005	19/12/2012	1/4/2013		R.					
Greece	17/11/2005	11/4/2014	1/8/2014							
Hungary	10/10/2007	4/4/2013	1/8/2013							
Iceland	16/5/2005	23/2/2012	1/6/2012							
Ireland	13/4/2007	13/7/2010	1/11/2010							
Italy	8/6/2005	29/11/2010	1/3/2011							
Latvia	19/05/2006	6/3/2008	1/7/2008		R.					

	Signature	Ratification	Entry into Force	Notes	R.	D.	A.	T.	C.	O.
Liechtenstein	30/11/2015	27/1/2016	1/5/2016							
Lithuania	12/2/2008	26/7/2012	1/11/2012							
Luxembourg	16/5/2005	9/4/2009	1/8/2009							
Malta	16/5/2005	30/1/2008	1/5/2008		R.					
Monaco	30/11/2015	30/11/2015	1/3/2016		R.					
Montenegro	16/5/2005	30/7/2008	1/11/2008	55						
Netherlands	17/11/2005	22/4/2010	1/8/2010					T.		
North Macedonia	17/11/2005	27/05/2009	1/9/2009			D.				
Norway	16/5/2005	17/1/2008	1/5/2008							
Poland	16/5/2005	17/11/2008	1/3/2009		R.	D.				
Portugal	16/5/2005	27/2/2008	1/6/2008		R.					
Republic of Moldova	16/5/2005	19/5/2006	1/2/2008			D.				
Romania	16/5/2005	21/8/2006	1/2/2008							
San Marino	19/5/2006	29/11/2010	1/3/2011							
Serbia	16/5/2005	14/4/2009	1/8/2009	55						
Slovak Republic	19/5/2006	27/3/2007	1/2/2008							
Slovenia	3/4/2006	3/9/2009	1/1/2010		R.					
Spain	9/7/2008	2/4/2009	1/8/2009			D.				
Sweden	16/5/2005	31/5/2010	1/9/2010		R.					
Switzerland	8/9/2008	17/12/2012	1/4/2013		R.					
Türkiye	19/3/2009	2/5/2016	1/9/2016			D.				
Ukraine	17/11/2005	29/11/2010	1/3/2011			D.				
United Kingdom	23/3/2007	17/12/2008	1/4/2009		R.					
	Signature	Ratification	Entry into Force	Notes	R.	D.	A.	T.	C.	O.
Belarus		26/11/2013 a	1/3/2014							
Canada										
Holy See										
Israel		28/05/2021 a	01/09/2021							
Japan										
Mexico										
United States of America										
	Signature	Ratification	Entry into Force	Notes	R.	D.	A.	T.	C.	O.
European Union										

Total number of signatures not followed by ratifications: 0

Total number of ratifications/accessions: 48

Notes

(55) Date of signature by the state union of Serbia and Montenegro.

a: Accession – **s:** Signature without reservation as to ratification – **su:** Succession – **r:** Signature “ad referendum”.

R.: Reservations – **D.:** Declarations – **A.:** Authorities – **T.:** Territorial Application – **C.:** Communication – **O.:** Objection.

Source: Treaty Office on <http://conventions.coe.int>

Appendix 2

GRETA’s field of operations

States bound by the Convention

Albania	Georgia	Netherlands
Andorra	Germany	North Macedonia
Armenia	Greece	Norway
Austria	Hungary	Poland
Azerbaijan	Iceland	Portugal
Belarus	Ireland	Romania
Belgium	Italy	San Marino
Bosnia and Herzegovina	Israel	Serbia
Bulgaria	Latvia	Slovak Republic
Croatia	Liechtenstein	Slovenia
Cyprus	Lithuania	Spain
Czech Republic	Luxembourg	Sweden
Denmark	Malta	Switzerland
Estonia	Republic of Moldova	Türkiye
Finland	Monaco	Ukraine
France	Montenegro	United Kingdom





Appendix 3

List of GRETA members
(as at 31 December 2025)

Members	Term of office
President: Ms Conny Rijken (Netherlands)	31/12/2028
First Vice-President: Ms Antoaneta Vassileva (Bulgarian)	31/12/2026
Second Vice-President: Mr Luka Maderić (Croatian)	31/12/2026
Mr Thomas Ahlstrand (Swedish)	31/12/2028
Ms Tatiana Catana (Moldovan)	31/12/2026
Ms Lynn Chircop Faure (Maltese)	31/12/2028
Ms Dorothea Czarnecki (German)	31/12/2028
Ms Ia Dadunashvili (Georgian)	31/12/2026
Ms Ulrike Haberl-Schwarz (Austrian)	31/12/2028
Ms Biljana Lubarovska (Macedonian)	31/12/2026
Mr David Mancini (Italian)	31/12/2028
Ms Svala Isfeld Olafsdottir (Icelandic)	31/12/2026
Ms Rita Penedo (Portuguese)	31/12/2026
Mr Peter Van Hauwermeiren (Belgian)	31/12/2028
Mr Georgios Vanikiotis (Greek)	31/12/2028



Appendix 4

Secretariat of the Council of Europe Convention on Action against Trafficking in Human Beings (as at 31 December 2025)

Ms Petya Nestorova, Executive Secretary of the Convention

Mr Elvin Aliyev, Administrator

Ms Teresa Armengol de la Hoz, Administrator

Mr Mesut Bedirhanoglu, Administrator

Ms Parvine Ghadami, Administrator

Mr Yuriy Paltsev, Administrator

Ms Jenna Logeais, Senior Project Officer

Ms Ebru Seylan, Senior Project Officer⁶²

Ms Saida Theophile, Principal Administrative Assistant

Ms Jackie Renaudin-Siddall, Administrative Assistant

Ms Khrystyna Chornii, Administrative Assistant

Co-operation projects staff

Ms Ségolène Chesneau, Senior Project Officer

Ms Monica Petrovici-Ronecker, Senior Project Officer

Mr Lucas Mathieu, Administrative Assistant⁶³

62. Employed from February to June and from September to December 2025.

63. Employed from February to June 2025.

Appendix 5

List of GRETA's activities during the period 1 January to 31 December 2025

GRETA meetings

- ▶ 53rd meeting (24-28 March 2025)
- ▶ 54th meeting (30 June - 4 July 2025)
- ▶ 55th meeting (17-21 November 2025)

GRETA's evaluation visits (in chronological order)

- | | |
|---|----------------------|
| ▶ Latvia (4th evaluation round) | 7-11 April 2025 |
| ▶ Armenia (4th evaluation round) | 14-18 April 2025 |
| ▶ Bosnia and Herzegovina (4th evaluation round) | 12-16 May 2025 |
| ▶ Norway (4th evaluation round) | 2-6 June 2025 |
| ▶ France (4th evaluation round) | 16-25 June 2025 |
| ▶ Portugal (4th evaluation round) | 14-18 July 2025 |
| ▶ Luxembourg (4th evaluation round) | 23-26 September 2025 |
| ▶ Belgium (4th evaluation round) | 3-7 November 2025 |
| ▶ North Macedonia (4th evaluation round) | 1-5 December 2025 |
| ▶ Ireland (4th evaluation round) | 1-5 December 2025 |
| ▶ Serbia (4th evaluation round) | 1-5 December 2025 |
| ▶ Slovenia (4th evaluation round) | 16-19 December 2025 |

GRETA country evaluation reports (in order of publication)

- | | |
|--|------------------|
| ▶ Liechtenstein (3rd evaluation round) | 3 February 2025 |
| ▶ Austria (4th evaluation round) | 11 March 2025 |
| ▶ Slovak Republic (4th evaluation round) | 26 March 2025 |
| ▶ Cyprus (4th evaluation round) | 28 April 2025 |
| ▶ Republic of Moldova (4th evaluation round) | 10 June 2025 |
| ▶ Ukraine (3rd evaluation round) | 12 June 2025 |
| ▶ Albania (4th evaluation round) | 18 June 2025 |
| ▶ Croatia (4th evaluation round) | 19 June 2025 |
| ▶ Bulgaria (4th evaluation round) | 9 October 2025 |
| ▶ Georgia (4th evaluation round) | 20 October 2025 |
| ▶ Montenegro (4th evaluation round) | 3 November 2025 |
| ▶ Romania (4th evaluation round) | 12 November 2025 |
| ▶ Denmark (4th evaluation round) | 1 December 2025 |

Appendix 6

List of activities organised to support the implementation of GRETA's recommendations during the period 1 January to 31 December 2025

Warsaw, 28 February 2025

Round-table on the implementation of GRETA's 3rd report recommendations by Poland

Online, 13 March 2025

Webinar of the Council of Europe network of specialised lawyers and NGOs providing legal assistance to victims of human trafficking

Skopje, 2 April 2025

Round-table on the implementation of GRETA's 3rd report recommendations by North Macedonia

Belgrade, 10 April 2025

Round-table on the implementation of GRETA's 3rd report recommendations by Serbia

Bakou, 24 April 2025

Round-table on the implementation of GRETA's 3rd report recommendations by Azerbaijan

Rabat, 10–11 June 2025

High-level Conference "Empowering Change: Technology and Artificial Intelligence in the Fight against Human Trafficking", under the Maltese Presidency of the Council of Europe Committee of Ministers

Amsterdam, 8 July 2025

Round-table on the implementation of GRETA's 3rd report recommendations by the Netherlands

Stockholm, 9-10 September 2025

Round-table on the implementation of GRETA's 3rd report recommendations by Sweden and high-level meetings with the Swedish authorities co-organised with the OSCE Special Representative and Co-ordinator on Combating Trafficking in Human Beings

Strasbourg, 11-12 September 2025

Annual meeting of National Anti-Trafficking Co-ordinators and Rapporteurs or equivalent mechanisms, co-organised with the OSCE

Warsaw, 18 September 2025

Conference marking the 30th anniversary of La Strada International and the 20th anniversary of the adoption of the Council of Europe Convention on Action against Trafficking in Human Beings

Reykjavik, 30 September- 1 October 2025

Round-table on the implementation of GRETA's 3rd report recommendations by Iceland and high-level meetings with the Icelandic authorities co-organised with the OSCE Special Representative and Co-ordinator on Combating Trafficking in Human Beings

Strasbourg, 3-4 November 2025

Meeting of the Council of Europe network of specialised lawyers and NGOs providing legal assistance to victims of human trafficking

Budapest, 13 November 2025

Round-table on the implementation of GRETA's 3rd report recommendations by Hungary

Activities organised under the joint EU-Council of Europe Programme Horizontal Facility III for the Western Balkans and Türkiye

North Macedonia

- ▶ Training for psychologists and other staff of SOS village and foster homes, 27-28 February 2025, Skopje
- ▶ Training on the European Court of Human Rights case-law on human trafficking for lawyers and NGOs providing legal aid to victims of human trafficking, 8-9 May 2025, Skopje
- ▶ Training on free legal aid and victim-sensitive approach for lawyers, 12-13 June 2025, Skopje
- ▶ Simulation-based training on victim-centred criminal investigations, 23-26 September 2025, Skopje
- ▶ Workshop on access to compensation for victims of human trafficking, 9 December 2025, Skopje
- ▶ Workshop on communicating human trafficking cases to the public in a victim oriented and gender-centred manner, 16 December 2025, Skopje

Serbia

- ▶ Roundtable on the prevention of sexual exploitation, human trafficking and prostitution in Serbia, 22 January 2025, Belgrade
- ▶ Training programme on combating trafficking in human beings for judges and public prosecutors, January-April 2025, Belgrade
- ▶ Roundtable on victims' protection and ECHR case-law, including the presentation of the updated *Manual for lawyers* produced by the NGO Astra, 25 March 2025, Belgrade
- ▶ Workshop on the prevention of human trafficking for labour exploitation for labour inspectors, 24-25 April 2025, Vrnjačka Banja
- ▶ Training workshop on the prevention of child trafficking in Roma communities, 18 September 2025, Belgrade
- ▶ Training on combating trafficking for labour exploitation for police officers, public prosecutors and labour inspectors, 17-18 November 2025, Belgrade
- ▶ Roundtable on providing legal assistance and free legal aid to victims of human trafficking, 28 November 2025, Niš

Activities organised under the project *Strengthening access to justice and effective remedies for victims of trafficking in Bosnia and Herzegovina*

- ▶ Training for lawyers on the rights of victims of trafficking in human beings in criminal proceedings, 22-23 April 2025, Konjic,
- ▶ Training sessions for professionals working with children in criminal proceedings, 16-18 June 2025, Mostar; 23-25 June 2025, Bihać; 24-25 September 2025, Zenica
- ▶ Workshop for judges and prosecutors on the rights of victims and compensation, 30 June 2025, Buna, Mostar
- ▶ Capacity building on financial investigations and confiscation of criminal assets, 10-11 July 2025, Jahorina
- ▶ Training of Trainers on victim-centred interviews, 14-15 July 2025, Bjelašnica
- ▶ Expert meeting on forced begging, 2-3 October 2025, Sarajevo
- ▶ Workshop for judges and prosecutors within the Annual Symposium of Prosecutors on the rights of victims and compensation for victims of human trafficking, 15-17 October 2025, Neum

Activities organised under the joint EU-Council of Europe project “Supporting Malta in the design and implementation of a new anti-trafficking strategy (2022-2025)”

- ▶ Final conference on the project and side event on “Participation of Children in Designing Child-Friendly Anti-Trafficking Tools”, Saint Julians, 15-16 January 2025

Activities organised under the joint EU-Council of Europe project “Improving the support services for child victims of trafficking in Austria”

- ▶ Kick-off meeting of the project, 28 February 2025
- ▶ Preparation of the inception report and situation analysis

Appendix 7

Provisional timetable of GRETA's 4th Evaluation Round

Provisional timetable of GRETA's 4th evaluation round							
Parties	Questionnaire to be sent	Deadline for replies	Evaluation visits	Draft GRETA report	Final GRETA report		
Austria	July 2023	November 2023	December 2023	51st meeting, July 2024	52nd meeting, Nov 2024		
Cyprus			February 2024				
Slovak Republic							
Albania	October 2023	February 2024	April-June 2024	52nd meeting, Nov 2024	53rd meeting, March 2025		
Croatia							
Republic of Moldova							
Georgia			Sept-Dec 2024	53rd meeting, March 2025	54th meeting, July 2025		
Bulgaria							
Denmark							
Montenegro							
Romania							
Malta							
Malta	May 2024	September 2024		54th meeting, July 2025	55th meeting, Nov 2025		
United Kingdom	June 2024	October 2024					
Latvia	October 2024	February 2025	April-June 2025	55th meeting, Nov 2025	56th meeting, March 2026		
Armenia	June 2024	October 2024					
Bosnia and Herzegovina							
Norway							
France	October 2024	February 2024					
Portugal	November 2024	March 2024	July 2024				
Belgium	February 2025	June 2025	Sept-Dec 2025	56th meeting, March 2026	57th meeting, July 2026		
Ireland							
Luxembourg							
North Macedonia							
Slovenia	July 2025	November 2025	Jan-March 2026	57th meeting, July 2026	58th meeting, Nov 2026		
Serbia							
Spain							
Poland							
Azerbaijan							
Sweden	January 2026	May 2026	April-June 2026	58th meeting, Nov 2026	59th meeting, March 2027		
Netherlands			Sept-Dec 2026	59th meeting, March 2027	60th meeting, July 2027		
Iceland							
Andorra	June 2026	October 2026	Jan-March 2027	60th meeting, July 2027	61st meeting, Nov 2027		
Lithuania							
Italy			April-June 2027	61st meeting, Nov 2027	62nd meeting, March 2028		
Hungary							
Monaco							
Finland			June-Sept 2027				
Germany							
San Marino			January 2027	May 2027			
Switzerland							
Liechtenstein	June 2027	October 2027	Oct-Dec 2027	62nd meeting, March 2028	63rd meeting, July 2028		
Ukraine							

Note: Belarus, the Czech Republic, Estonia, Greece, Israel, Türkiye, and other new parties to the Convention will undergo the third evaluation round approximately four years after the second evaluation, unless otherwise decided by GRETA (Rules 2 and 3 of the Evaluation Procedure).

Appendix 8

Participation of GRETA members and Secretariat in relevant events and meetings

Online, 14 January 2025

Lecture about GRETA's work in a lecture series to celebrate 75 years of the Council of Europe, organised by the Dutch Ministry of Justice and Security and the Ministry of Foreign Affairs

Strasbourg, 21 January 2025

Event on human trafficking for students from the University of Strasbourg's Master's programme in Human Rights Law

Strasbourg, 21 January 2025

4th meeting of the Council of Europe Consultation Group on the Children of Ukraine, discussion on follow-up to the report "Understanding the risks of human trafficking on children of Ukraine"

Sofia, 6–7 February 2025

Conference "The Route of Labour Migration – Pitfalls and Opportunities for Third-Country Nationals", organised by the Bulgarian National Commission for Combating Human Trafficking and the International Justice Mission

Malta, 18 March 2025

Final International Workshop of the DISRUPT Project "Breaking the Chain: Using Digital Evidence to Tackle Trafficking"

Online, 19 March 2025

International Association of Prosecutors webinar "Modern Slavery and Human Trafficking Prosecutions", session on the link between migrant smuggling, trafficking and organised crime

Vienna, 30 March – 1 April 2025

OSCE 25th Alliance against Trafficking in Persons Conference "Protecting Childhoods, Shaping Futures: A Call to End Child Trafficking", including a Council of Europe side event on preventing trafficking and online exploitation among displaced children of Ukraine

Vienna, 2 April 2025

Alliance Expert Co-ordination Team (AECT) meeting, organised by the OSCE

Teramo, 16 April 2025

University of Teramo lecture "Legal profiles of the protection of trafficked victims between EU and Italian law"

Strasbourg, 23 April 2025

Presentation of the Anti-Trafficking Convention to a delegation of the General Prosecutor Office of Kyrgyzstan

Online, 23 May 2025

Conference “Gender-sensitive approaches to combating human trafficking in the EU: strengthening support for asylum-seeking women and girls in Europe”, organised by France terre d’asile

Berlin, 26 May 2025

Workshop “Trafficking and Exploitation of Children and Adolescents – Professional Exchange of Child and Youth Welfare Departments”, organised by the German National Rapporteur Mechanism on trafficking in human beings

Vienna, 5 June 2025

Anniversary Conference of the Austrian Platform against Human Trafficking

Strasbourg, 12–13 June 2025

Meeting of the Network of National Focal Points on Travel for Transplantation (NETTA)

Online, 18–19 June 2025

UNODC Regional Expert Group Meeting “Hidden Victims, Visible Crimes: Addressing Forced Criminality in Human Trafficking Cases in South-Eastern Europe”

Strasbourg, 19 June 2025

11th meeting of the Council of Europe network of focal points on migration

Online, 23 June 2025

Launch of the HELP eLearning course on combating human trafficking in Armenia

Salerno, 23–26 June 2025

Migramed 2025 – Labour exploitation, an unacceptable business through Italy, organised by Caritas Italiana and Caritas Internationalis

Online, 15 September 2025

Training “Professional support for survivors of trafficking: identification, protection, justice, recovery”, organised by the NGO Step Up Stop Slavery

Strasbourg, 8 October 2025

Presentation of the Anti-Trafficking Convention to a study visit of the Egyptian Public Prosecution Office to the Council of Europe

Sofia, 10 October 2025

High-level Conference “Strengthening synergies: advancing cross-border strategies to combat labour exploitation”, co-organised by the European Labour Authority, the Ministry of Labour and Social Policy and the National Commission for Combating Trafficking in Human Beings of Bulgaria

Online, 14 October 2025

First meeting of the Irish Network of Anti-Trafficking Lawyers

Vienna, 16 October 2025

Annual Conference on Combating Trafficking in Human Beings, organised by the Austrian Task Force on Combating Human Trafficking

Paris, 16 October 2025

Event marking the European Anti-Trafficking Day, organised by MIPROF

Rome, 16 October 2025

Event marking the European Anti-Trafficking Day “National anti-trafficking system, 25 years of commitment in favour of victims”, organised by the Italian Department for Equal Opportunities

Online, 16 October 2025

Round-table on child trafficking in Ireland: towards a common understanding, organised by MECPATHS and University College Cork

Brussels, 20 October 2025

Conference “30 years of combating trafficking in human beings, a future to be written”, organised by the Belgian Ministry of Justice and Myria

Malta, 23 October 2025

Conference “Safeguarding the Best Interests of the Child: Justice, Protection and Inclusion”, organised by Malta’s Ministry of Justice under Malta’s Presidency of the Council of Europe Committee of Ministers

Vienna, 24 October 2025

41st Council of Europe - OSCE Co-ordination Group meeting and side event “Addressing Human Trafficking Together: Joint Approaches, Evolving Challenges and Strategic Co-operation”

Online, 29 October 2025

ICAT Annual Principals’ Meeting

Belgrade, 7 November 2025

Inter-Ministerial Conference “Labour Migration within the Central European Initiative: Regular Pathways and Sustainable Labour Markets”, organised by the Serbian Ministry of Labour, Employment, Veteran and Social Affairs in co-operation with GIZ and IOM

Skopje, 12 November 2025

UNODC Regional Conference “Enhancing Cross-Border Co-operation of National Referral Mechanisms to Address Trafficking in Persons in Contexts of Displacement and Mixed Migration Flows”

Geneva, 13 November 2025

Event marking the 10th anniversary of the specialised service for victims of trafficking of *Centre Social Protestant*

Online, 14 November 2025

Regional seminar on Trafficking in Human Beings organised by multidisciplinary teams co-ordinated by the Portuguese Family Planning Association (APF)

Tunis, 2 December 2025

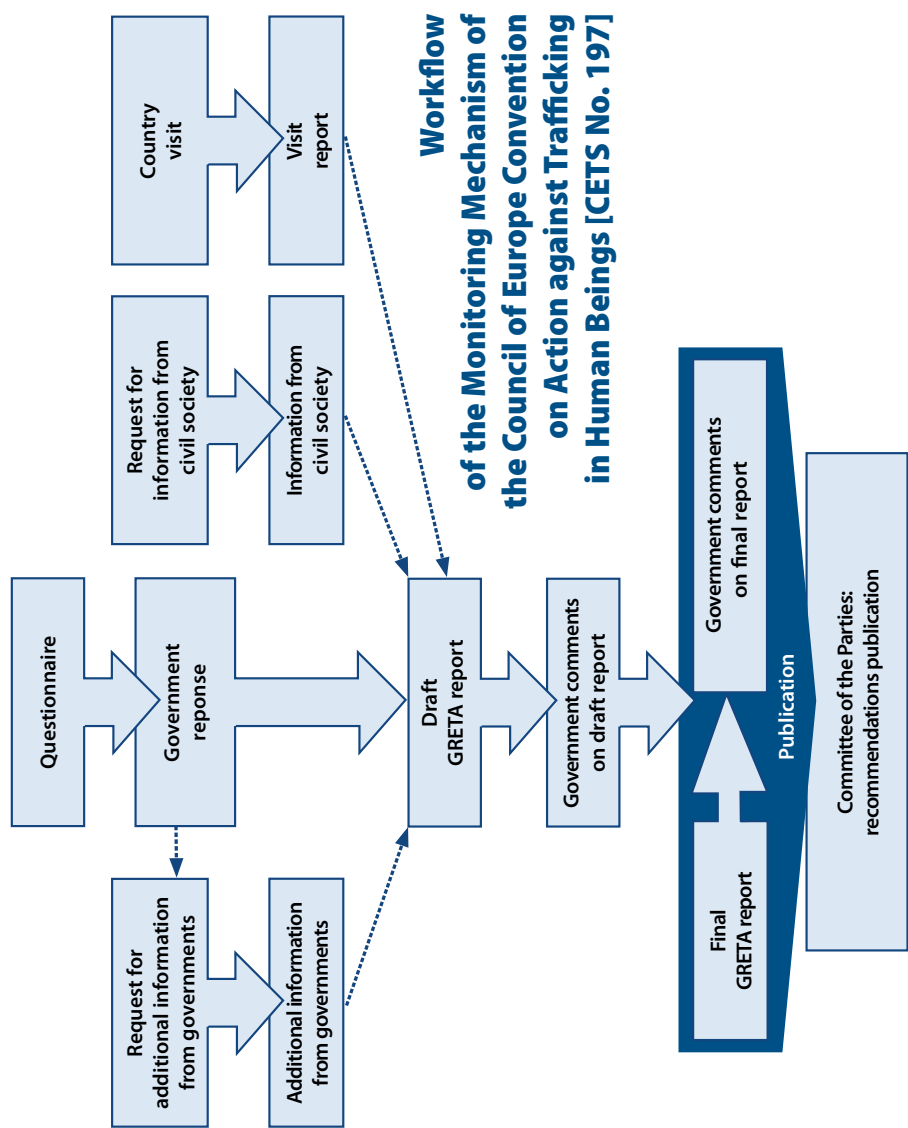
Technical Workshop on the Convention on Action against Trafficking in Human Beings

Paris, 8 December 2025

Exchange of views with PACE's Committee on Migration, International Protection and Economic Co-operation (on the role of the Council of Europe in implementing the European Pact on Migration and Asylum)

Appendix 9

Workflow of the monitoring mechanism of the Council of Europe Anti-Trafficking Convention



The Council of Europe Convention on Action against Trafficking in Human Beings, in force since 2008, provides a comprehensive framework for combating trafficking in human beings from a human-rights based and victim-centred perspective. To date, the Convention has been ratified by all 46 member states of the Council of Europe, as well as by the non-member states Belarus and Israel.

The Group of Experts on Action against Trafficking in Human Beings (GRETA) is responsible for evaluating the implementation of the Convention by the States Parties. Its recommendations help to trigger legislative changes, raise awareness of the various forms of human trafficking and better protect the rights of trafficked persons.

GRETA's 15th General Report presents an overview of its activities from 1 January to 31 December 2025, including meetings, evaluation visits, country reports, round tables, and relations with other Council of Europe bodies, international organisations and non-governmental organisations. The Report also includes a chapter on human trafficking for the purpose of criminal exploitation, a growing trend across States Parties to the Council of Europe Convention. It highlights GRETA's findings and recommendations to strengthen prevention, early identification of victims and the implementation of the non-punishment provision.

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The Council of Europe is the continent's leading human rights organisation. It comprises 46 member states, including all members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.

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