



Chapter 3. Summary report: challenges, training needs, and good practices to combat human trafficking

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3. Summary report: challenges, training needs, and good practices to combat human trafficking

3.1 Introduction

This chapter delves into the complex and multi-faceted issue of human trafficking for the purpose of labour exploitation across six European countries: Bulgaria, Germany, Greece, Poland, Romania, and Slovenia, per the findings of ERADICATING II Project Report, published in 2024.

The methodology of this report, which combines desk research with qualitative insights from focus groups and interviews with key stakeholders, including law enforcement officials, NGO representatives, judicial personnel, and other frontline practitioners, is comprehensive and in-depth.

Drawing from the report, the chapter is designed to overview challenges, training needs, and good practices identified across all six participating countries.

The findings found in this chapter underscore the importance of a multi-faceted approach that addresses the complex and context-specific realities of trafficking while also fostering international collaboration to tackle this transnational crime effectively.



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3.2 Learning objectives

As a result of completing this chapter, trainees will:

- Identify and name a number of shared challenges in combatting labour trafficking across participating states.
- Identify and name unique challenges in combatting labour trafficking pertaining to specific participating states.
- Identify and name specific training needs pertaining to specific participating states in direct application to first-line practitioners.
- Recognize good practices that are currently shared across participating states.
- Recognize currently existing country-specific good practices and their resulting positive impacts.
- Consider general recommendations for future courses of action.
- Identify and produce guiding questions that may lead to the identification of key indicators of human trafficking.

3.3 Shared challenges

The fight against human trafficking for the purpose of labour exploitation presents a complex and multifaceted challenge across Bulgaria, Germany, Greece, Poland, Romania, and Slovenia. Despite the varied contexts of these countries, several shared difficulties emerge, which underscore the pervasive and transnational nature of this issue.



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Across all six ERADICATING II countries, several shared challenges in addressing labour trafficking have been identified:

Effective Identification and Awareness of Trafficking Victims

Victims often do not recognise themselves as such and/or do not proceed to self-revelation due to a combination of fear, mistrust of authorities, and a sense of resignation from their circumstances. This issue is exacerbated by a widespread lack of awareness about their rights, compounded by cultural stigma and social exclusion.

Corruption and Complicity within Law Enforcement and other Local Authorities

Complicity not only undermines public trust in the legal system but also hampers the effective prosecution of traffickers, as cases are often mishandled or downgraded to lesser offences. Although Slovenia also contends with corruption, the scale and impact appear less pervasive, suggesting variations in the depth of this issue across the region.

Outdated Legal and Procedural Barriers

Many participating countries struggle with outdated or inadequate legal frameworks that fail to capture the complexities of modern labour trafficking. Moreover, a lack of specialized knowledge among prosecutors and judges has hindered the effective prosecution of traffickers.

Interagency Coordination and Resource Allocation

The fragmentation of responsibilities among different agencies and organizations often leads to a disjointed response, with each entity focusing narrowly on its mandate without a holistic view of the problem.





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This fragmentation is not only operationally inefficient but also detrimental to the victim's journey through the support system, as inconsistent communication and cooperation can result in gaps in assistance. The problem is further exacerbated by insufficient funding, which limits the ability of these agencies.

Support Services for Trafficking Victims are Generally Inadequate

A number of participating countries face challenges in providing comprehensive and accessible services, such as shelter, legal aid, and long-term reintegration support.

This deficit of services is compounded by the complex needs of victims, who may require specialized care, legal protection, and assistance navigating unfamiliar legal and social systems

International Cooperation

International cooperation is crucial in combating the transnational nature of human trafficking, yet it remains fraught with difficulties. The differences in legal frameworks and procedural norms between countries pose significant challenges, particularly in coordinating cross-border investigations and prosecutions.

Harmonising efforts across borders is difficult and underscores the need for stronger international legal instruments and more robust cooperation mechanisms.





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3.3.1 Bulgaria

- In Bulgaria, combating labour trafficking is sometimes hampered by inactivity within law enforcement and the judiciary.³¹
 - Cases of labour trafficking are frequently downgraded to minor domestic labour rule violations, mainly due to the reluctance of local police to investigate these cases.^{32 33}
 - Furthermore, the authorities often confuse human trafficking with irregular migration and smuggling, complicating legal responses and victim support.³⁴
- Authorities in Bulgaria, particularly at the local level, demonstrate a lack of sensitivity towards trafficking victims and an insufficient understanding of trafficking laws and referral procedures. This issue is compounded by the frequent confusion between human trafficking and irregular migration, which impedes the proper handling of labour trafficking cases.

³¹ <https://www.state.gov/reports/2023-trafficking-in-persons-report/bulgaria/>

³² Semi-structured interview with a law enforcement representative in Bulgaria, part of the ERADICATING II project: April 2024.

³³ Semi-structured interview with a prosecution representative in Bulgaria, part of the ERADICATING II project: April 2024.

³⁴ Focus group with state institutions and NGO representatives in Bulgaria, part of the ERADICATING II project: April 2024.

- Cultural issues and stigma, particularly within the Romani community, present substantial obstacles in identifying and addressing trafficking crimes. Many individuals who have been trafficked may be unaware of their exploitation or their eligibility for assistance, further complicating efforts to provide support. Language barriers also restrict labour trafficking victims' access to support and legal services.³⁵
- There is a significant lack of consistency in collaboration among different agencies, resulting in inefficient information and resource-sharing deficiencies. This fragmented approach negatively impacts the overall effectiveness of anti-trafficking activities. Many agencies also lack specialised expertise regarding the intricacies of human trafficking, which hampers their ability to conduct effective inter-agency operations and provide adequate assistance to victims.³⁶
- The lack of consistent international cooperation further complicates the investigation and prosecution of human trafficking cases.³⁷ Feedback from international authorities is often poor, and there is a general lack of synchronisation between the Labour Inspectorate and the Ministry of Interior, resulting in inefficient handling of cases.³⁸

³⁵ <https://fra.europa.eu/en/publication/2023/fundamental-rights-report-2023>

³⁶ <https://hopeforjustice.org/news/who-is-vulnerable-to-human-trafficking/>

³⁷ Semi-structured interview with state agency representatives in Bulgaria, part of the ERADICATING II project: April 2024.

³⁸ Semi-structured interview with a state agency representative in Bulgaria, part of the ERADICATING II project: April 2024.

3.3.2 Germany

- Few public prosecutors' offices specialise in human trafficking, with such cases typically handled by units dedicated to organised crime. Training and continuing education for public prosecutors and judges on labour exploitation is voluntary and limited, leading to a significant knowledge gap in the justice system.³⁹ This gap contributes to the difficulty in securing convictions, as the legal and procedural nuances of trafficking cases are poorly understood.
- The justice system's response to labour trafficking is hampered by a lack of experience among judges, public prosecutors, and lawyers. Specialised knowledge is scarce, and many legal professionals have little to no experience handling such cases. The absence of hard evidence and the reluctance of victims to provide complete statements in court further weaken the prosecution's case, making personal testimony crucial yet often unattainable.⁴⁰
- The legal framework itself presents hurdles. The penal norms related to labour trafficking are relatively new and investigating authorities have limited experience. Europol statistics highlight that the identification system for victims in Germany differs significantly from those in other countries. Implementing a two-stage model, with provisional identification through specialised counselling centres and

³⁹ Focus group with NGO representatives in Germany, part of the ERADICATING II project: April 2024.

⁴⁰ Semi-structured interview with a law enforcement representative in Germany, part of the ERADICATING II project: April 2024.

final identification by authorities, as recommended by GRETA and OSCE, could improve the situation.⁴¹

- Victim cooperation remains a critical challenge. Many victims are unaware of their victimisation, fearful of authorities, and lack trust in the state. They often do not know where to seek help or are unwilling to testify, which is essential for successful prosecutions. The willingness of victims to cooperate is often hindered by their limited trust in the authorities and fear of retaliation from traffickers.

3.3.3 Greece

- In Greece, the increasing complexity of the online aspects of trafficking presents a formidable challenge in addressing the phenomenon. Perpetrators often employ encryption technologies and other advanced digital tools to recruit, control, and threaten victims. This broadens their scope of action and complicates detection and intervention efforts by law enforcement.⁴² The hidden nature of these crimes, coupled with the fear and mistrust victims often have towards authorities, exacerbates the problem.
- Greece's prosecution and trial processes face obstacles, including gathering sufficient evidence, securing victims' testimonies, and navigating legal hurdles.

⁴¹ BAMF - Bundesamt für Migration und Flüchtlinge - EMN Deutschland Paper - Bekämpfung von Menschenhandel

⁴² Semi-structured interview with a border police official in Greece, part of the ERADICATING II project: April 2024.

The complexities of jury selection, evidence presentation, and maintaining a fair trial process add additional layers of difficulty. The time-consuming procedures, the lack of Recognition Acts provided to victims, which also entail a residence permit, the lack of adequate support and the victim's fear of re-victimisation further hinder the successful prosecution of cases.⁴³

- Another critical challenge is providing comprehensive support to victims. This includes ensuring safe housing, access to legal and social services, addressing trauma and mental health needs, and offering long-term support for reintegration into society.⁴⁴
 - Characteristically, participants highlighted the shortage of accommodation and shelters for male victims of THB.⁴⁵ The availability and quality of these services vary significantly, often leaving victims without the support needed to rebuild their lives.
- The hidden nature of labour trafficking complicates efforts to identify and assist victims. Many victims with migrant or refugee backgrounds live in fear and mistrust of authorities, making them reluctant to come forward, even when the Labour Inspectorate performs investigations and could potentially help with their

⁴³ Semi-structured interview with a judge in Greece, part of the ERADICATING II project: April 2024.

⁴⁴ Semi-structured interview with a social worker in Greece, part of the ERADICATING II project: April 2024.

⁴⁵ Focus group with NGO representatives, lawyers, social workers, and public health officials & semi-structured interview with a social worker from the National Public Health Organisation in Greece, part of the ERADICATING II project: April 2024.



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situation.⁴⁶

3.3.4 Poland

- The hidden nature of labour trafficking complicates efforts to identify and assist victims. Illegal migration, mainly due to economic, political, and armed conflicts, increases the number of potential victims. The challenges of identifying victims are exacerbated by the victims' lack of awareness of their rights and the thin line between illegal employment and human trafficking.

For instance, Ukrainian workers often face delayed payments and are misled by false promises, resulting in exploitative conditions. Minors from Ukraine seeking employment without knowledge of the language or legal procedures are particularly vulnerable.⁴⁷

- Building trust between victims and those assisting is also a significant challenge. Competence in language, culture, and customs is crucial for practical support, yet no single regulation governs these interactions.
- International cooperation is another critical challenge. The varied legal frameworks across countries complicate the prosecution of cross-border crimes. The lack of a consistent definition of human trafficking, particularly in relation to

⁴⁶ Semi-structured interview with a labour inspectorate representative in Greece, part of the ERADICATING II project: April 2024.

⁴⁷ Semi-structured interview with an NGO representative in Poland, part of the ERADICATING II project: April 2024.

new forms of exploitation like those seen with war refugees, further hampers efforts.

For example, cases involving forced labour or sexual exploitation often face difficulties in legal classification, both nationally and internationally.⁴⁸

- The legal qualification of labour exploitation as human trafficking remains problematic. The distinction between forced labour and mere violations of workers' rights is not always clear. This issue is compounded by the lack of a modern definition of forced labour, as existing definitions, such as those from the International Labour Organization, are outdated and do not reflect contemporary realities.⁴⁹
- Staff shortages and the need for specialised training among police officers, especially front-line ones, are significant hurdles. The police require continuous training to assess situations and correctly identify potential victims. Collaboration with international bodies is crucial, as human trafficking often involves multiple countries.⁵⁰

⁴⁸ Semi-structured interview with a police officer in Poland, part of the ERADICATING II project: April 2024.

⁴⁹ Act of 6 June 1997 - Penal Code.

⁵⁰ Semi-structured interview with a police officer in Poland, part of the ERADICATING II project: April 2024.

3.3.5 Romania

- In Romania, the fight against human trafficking is impeded by various systemic issues and operational challenges. The draft national strategy for combating THB for 2024-2028 highlights that the National Referral Mechanism is insufficiently known, understood, and integrated within institutional procedures.⁵¹ This results in different perceptions of the concepts and tools presented in the NRM, leading to misalignment in institutional practices. Additionally, the involvement of local authorities in trafficking activities poses a significant challenge in the identification and prosecution of THB cases.⁵²
- Corrupt practices among officials further complicate the anti-trafficking efforts. For instance, there have been cases where sanctioned companies reopened under new names to evade scrutiny, and law enforcement agents faced intimidation from organized crime groups.
- Labour inspectors and other oversight authorities often fail to identify signs of trafficking due to a lack of understanding of THB indicators. Inspectors are reticent to get involved beyond basic paperwork verifications. For instance, the

⁵¹<https://anitp.mai.gov.ro//ro/docs/studii/Raportul%20anual%20privind%20evolu%C8%9Bia%20traficului%20de%20persoane%20%C3%AEn%202022.pdf>

⁵² Semi-structured interview with a public official in the anti-THB agency in Romania, part of the ERADICATING II project: April 2024.

Migration Authority has been criticised for not recognising poor living conditions as indicators of exploitation.⁵³

- Another significant challenge is the legal framework and the practical application of laws. The Romanian legal system's extensive and time-consuming processes often hinder the efficient prosecution of trafficking cases. Statutes of limitations have also posed problems, leading to the dismissal of cases after lengthy investigations. The overlap of criminal code elements and insufficient coordination in the prosecution service results in inefficiency and duplication of efforts.⁵⁴
- Language barriers and cultural differences further complicate the identification and support of victims. Labour inspectors and social service workers often cannot communicate effectively with foreign workers, which hampers their ability to identify and assist victims. Additionally, the lack of transparency and access to migrant workers' files prevents the timely detection of exploitation and abuse.⁵⁵

⁵³ Group of Experts on Action against Trafficking in Human Beings (2021) Evaluation report Romania.

Third evaluation round. Access to justice and effective remedies for victims of trafficking in human beings - <https://rm.coe.int/evaluation-report-on-the-implementation-of-the-council-of-europe-conve/1680a2b0f8>

⁵⁴ Group of Experts on Action against Trafficking in Human Beings (2021) Evaluation report Romania.

Third evaluation round. Access to justice and effective remedies for victims of trafficking in human beings - <https://rm.coe.int/evaluation-report-on-the-implementation-of-the-council-of-europe-conve/1680a2b0f8>

⁵⁵ Semi-structured interview with a labour inspector in Romania, part of the ERADICATING II project: April 2024.

- International cooperation is another critical challenge. Romania's involvement in transnational trafficking cases requires efficient coordination and information exchange with other countries.

However, the lack of capacity to analyse illicit financial flows and the absence of comprehensive statistics on international cooperation hinder these efforts. The involvement of multiple jurisdictions and the complexity of financial investigations add to the difficulties in prosecuting trafficking cases.⁵⁶

3.3.6 Slovenia

- In Slovenia, identifying signs of trafficking for labour is often hindered by the perception of such cases through the lens of economic crimes and misdemeanours. This misperception results in the overlooking of crucial indicators of trafficking. Victims do not typically keep records of their actual hours worked and paid, making it challenging to provide comparative documentation during investigations. Furthermore, victims are often not available for on-the-spot information gathering due to the constant presence of supervisors, who are usually suspects in these cases.⁵⁷

⁵⁶ <https://rm.coe.int/report-submitted-by-the-authorities-of-romania-on-measures-taken-to-co/1680aba92d>

⁵⁷ Semi-structured interview with a law enforcement officer in Slovenia, part of the ERADICATING II project: April 2024.



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- Practical cooperation between various law enforcement agencies, NGOs, and international partners is crucial but often lacking. Differences in legislation between countries can hinder the prosecution of cross-border trafficking cases, allowing perpetrators to exploit legal loopholes.⁵⁸

The Inter-ministerial Working Group on Combating Trafficking in Human Beings has acknowledged that law enforcement authorities are not sufficiently effective in identifying and investigating forced labour offences. There is a need to broaden the definition of trafficking in human beings and to increase penalties for related crimes.

- Migrants and other vulnerable groups often face language and cultural barriers, making it difficult for them to communicate with law enforcement or other institutions that could help them. There is a pressing need to strengthen the identification of trafficking victims among applicants for international protection, refugees, and migrants.⁵⁹

The impact of the Russian war in Ukraine has further complicated the detection and support of trafficking victims. Building trust between victims and police or NGO workers is crucial, as is addressing logistical issues such as providing safe spaces for interviews and accommodation for large groups of victims.⁶⁰

⁵⁸ Focus group with law enforcement officers in Slovenia, part of the ERADICATING II project: April 2024.

⁵⁹ Semi-structured interview with a law enforcement officer in Slovenia, part of the ERADICATING II project: April 2024.

⁶⁰ Focus group with law enforcement officers in Slovenia, part of the ERADICATING II project: April 2024.

- The practical application of laws related to trafficking also faces several shortcomings. For instance, the Manual on the Identification, Assistance, and Protection of Victims of Trafficking in Human Beings is being updated to address issues such as medical protection, the return of victims to their countries of origin, and the treatment of underage victims.

However, the lack of specialised services to help victims and the inconsistencies in case law across different courts indicate the need for a comprehensive review and expert analysis of the legal provisions and case law on trafficking.⁶¹

3.4 Training needs

While **victim identification, corruption and complicity within law enforcement, outdated legal and procedural barriers, the inadequacy of victim support services, and international cooperation** are shared to varying degrees across the six ERADICATING II countries, training needs vary, reflecting each country's unique challenges in combating human trafficking for labour exploitation.

Tailored, context-specific training programs that address both common and distinct needs will be crucial for enhancing each country's ability to respond to and prevent human trafficking effectively.

⁶¹ Semi-structured interview with a law enforcement officer in Slovenia, part of the ERADICATING II project: May 2024.

3.4.1 Bulgaria

- Specialized training for prosecutors, judges, and law enforcement is essential for understanding trafficking laws and prioritizing victims' needs. This includes distinguishing between trafficking, smuggling, and migration. Improved training will enhance prosecution rates and the quality of judgments in complex human trafficking cases.⁶²
- Enhancing awareness and social workers and service providers can significantly improve the assistance provided to victims. Specialized training should focus on victim identification, response, and support to ensure comprehensive protection and assistance.⁶³
- Trainers should address new trends and methods of recruitment, such as discreetly identifying and conversing with potential victims without alerting their traffickers.⁶⁴

⁶² Focus group with state institutions and NGO representatives in Bulgaria, part of the ERADICATING II project: April 2024.

⁶³ Semi-structured interview with state agency representatives in Bulgaria, part of the ERADICATING II project: April 2024.

⁶⁴ Focus group with state institutions and NGO representatives in Bulgaria, part of the ERADICATING II project: April 2024.



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- Law enforcement agencies must be updated on new communication technologies like TikTok and WhatsApp, which migrants, particularly Afghans, use.

3.4.2 Germany

- In Germany, there is a notable lack of a systematic approach to raising awareness among key professional groups regarding human trafficking and labour exploitation. The GRETA Commission's final report highlights the insufficient recognition of human trafficking for labour exploitation among employees of pertinent authorities, such as labour inspectors, police, public prosecutors, courts, and immigration officials.⁶⁵
- There is a need for increased knowledge of existing data systems designed to share information on suspicious activities with relevant units and authorities, such as the THB suspicion folder in EASy/rsCase.⁶⁶
- Training on legal aspects is also crucial, particularly regarding THB, related offences, and labour law. Participants should be educated on related offences, including § 15a of the Employee Overload Act, to ensure they can publicise and apply criminal offences with certainty and precision.

⁶⁵ Heike Rabe (2019): Bekämpfung des Menschenhandels. Empfehlungen an Deutschland von der Expert_innengruppe GRETA. Deutsches Institut für Menschenrechte.

⁶⁶ Semi-structured interview with a law enforcement representative in Germany, part of the ERADICATING II project: April 2024.

- The justice system also requires focused training from experts from both authorities and NGOs. This training should delve into the realities of THB and labour exploitation cases, exploring the difficulties in managing such cases and the complexities involved in the legal processes.⁶⁷
- Police and customs officials, in particular, need to be better informed on handling victims and the importance of adopting a 'service mentality' to ensure more cases are effectively managed and referred to NGOs.⁶⁸

3.4.3 Greece

- There is a need for the enhancement of skills related to digital forensics and cybercrime investigation techniques. Professionals need to be adept at understanding the various forms of trafficking and recognizing common indicators. This involves knowing how to conduct victim-centred interviews, understanding trauma-informed care, and being familiar with available resources and referral pathways.

⁶⁷ Semi-structured interview with a customs officer in Germany, part of the ERADICATING II project: June 2024.

⁶⁸ Focus group with NGO representatives in Germany, part of the ERADICATING II project: April 2024.

- Legal professionals require training in legal research, evidence collection, and courtroom presentation skills. Additionally, they need to understand the rules of evidence, effective communication, and case strategy development.⁶⁹
- Professionals must be equipped to identify and respond to trafficking situations, building partnerships with law enforcement and social service agencies to provide comprehensive support to victims. This includes developing skills for effective communication, conflict resolution, and understanding the roles and responsibilities of other agencies involved.⁷⁰
- Training should also extend to the general public, including schools and police, ensuring more people are able to recognize and respond to human trafficking.⁷¹
- Municipalities should support the organisation of information days for the general public in cooperation with civil society and public organisations.

3.4.4 Poland

- There is an urgent need to train police officers who are the first point of contact with applicants. These officers require the skills to recognise signs of human

⁶⁹ Focus group with NGO representatives, lawyers, social workers, and public health officials in Greece, part of the ERADICATING II project: April 2024.

⁷⁰ Semi-structured interview with a social worker in the NRM in Greece, part of the ERADICATING II project: April 2024.

⁷¹ Semi-structured interview with a judge in Greece, part of the ERADICATING II project: April 2024.

trafficking effectively. Proper identification at this stage ensures victims receive the necessary protection and support.⁷²

Training should encompass the latest victim identification indicators outlined in Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting victims, along with national documents developed based on this directive.

- In addition to first-line officers, criminal police officers and investigators who deal with human trafficking cases also need specialised training.
 - This training should focus on advanced investigative techniques and a deep understanding of the legal framework surrounding human trafficking.
 - Familiarity with victim identification indicators and labour trafficking indicators is essential for quick diagnosis and providing appropriate care to victims.⁷³
- Workshops and exchanges of experiences are recommended to foster collaboration and share best practices among institutions. These workshops should include participation from Europol, Frontex, Interpol, the EMPACT platform, and Eurojust. Such collaborative efforts will ensure a unified approach to combating human trafficking and supporting victims across borders.⁷⁴

⁷² Semi-structured interview with a prosecutor in Poland, part of the ERADICATING II project: May 2024.

⁷³ Semi-structured interview with a police officer in Poland, part of the ERADICATING II project: April 2024.

⁷⁴ Semi-structured interview with a police officer in Poland, part of the ERADICATING II project: April 2024.



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3.4.5 Romania

- The 2021 GRETA report highlighted the need to train labour inspectors, law enforcement officers, prosecutors, and judges to combat trafficking in human beings for labour exploitation and victims' rights.

It also recommended training for asylum and migration officials, border police, social workers, and medical staff on identifying trafficking of human beings victims and appropriate referral procedures.

- The GRETA report additionally recommends the training of relevant officials on effectively communicating victims' rights, promoting legal aid specialisation for trafficking victims, and integrating trafficking in human beings topics into the regular training curricula of various professional groups.⁷⁵
- Law enforcement staff still require training on trauma-informed and victim-centred practices. Training is recommended for labour inspectors and the judiciary on the psychological aspects of trafficking, compensation for victims, and modern investigation techniques, particularly those using online and informatics systems.⁷⁶

⁷⁵ Group of Experts on Action against Trafficking in Human Beings (2021) Evaluation report Romania.

Third evaluation round. Access to justice and effective remedies for victims of trafficking in human beings -<https://rm.coe.int/evaluation-report-on-the-implementation-of-the-council-of-europe-conve/1680a2b0f8>

⁷⁶ US Department of State, 2023 Trafficking in Persons Report: Romania (2023) – <https://www.state.gov/reports/2023-trafficking-in-persons-report/romania/>



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- Human trafficking is not part of the law curriculum in Romanian universities, indicating a need for continuous legal education. The National Institute of Magistracy - INM organised several training activities between 2019 and the first quarter of 2023, covering trauma, victims' rights, and international judicial cooperation.⁷⁷
- A significant gap identified was the lack of specific training for justice police officers on financial crime investigations related to trafficking in human beings.

Reluctance to engage in transnational financial investigations and money laundering issues were noted as areas requiring systemic training solutions.⁷⁸

3.4.6 Slovenia

- A key recommendation is the implementation of joint training sessions involving all institutions engaged in trafficking in human beings investigations.

These sessions should include presenting specific cases from start to finish and detailing all procedures, deadlines, and required documentation. This

⁷⁷<https://anitp.mai.gov.ro//ro/docs/studii/Raportul%20anual%20privind%20evolu%C8%9Bia%20traficului%20de%20persoane%20%C3%AEn%202022.pdf>

⁷⁸ Semi-structured interview with a public official in the anti-THB agency in Romania, part of the ERADICATING II project: April 2024.

comprehensive approach ensures clarity on responsibilities and timelines for issuing necessary documents.⁷⁹

- Investigator training programmes should focus on all possible methods of obtaining and analysing data on concrete cases. Continuous knowledge renewal is imperative for maintaining the efficacy of investigative procedures.⁸⁰

Continuous training is additionally urgently needed for administrative units, health services, the Social Security Agency, employment agencies, and various sectors such as hotels, catering, tourism, construction, cleaning services, and retirement homes. With the amendment to the Act on Compensation of Victims of Crime, effective 12 July 2023, there is a critical need for training judges, prosecutors, police officers, health professionals, and employers about the new provisions.

These amendments extend the right to compensation to third-country nationals and allow quicker compensation through a waiver of legal protection. Understanding these changes is vital for all stakeholders in providing legal and social support to THB victims.⁸¹

⁷⁹ Semi-structured interview with a law enforcement officer in Slovenia, part of the ERADICATING II project: April 2024.

⁸⁰ Semi-structured interview with a law enforcement officer in Slovenia, part of the ERADICATING II project: May 2024.

⁸¹ Semi-structured interview with a law enforcement officer in Slovenia, part of the ERADICATING II project: May 2024.



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3.5 Good practices and future approaches

3.5.1 Shared good practices

The approaches to combating human trafficking for labour exploitation in Bulgaria, Germany, Greece, Poland, Romania, and Slovenia reveal a blend of shared strategies.

A central theme across these nations is the **emphasis on inter-agency and international cooperation**, which is essential in addressing the complex and often transnational nature of trafficking. Collaborative efforts between governmental bodies, NGOs, and international partners are fundamental, facilitating information sharing, resources, and expertise.

Legislative frameworks and law enforcement training also play a pivotal role in these countries' strategies. Each nation has developed or refined its legal structures to criminalize trafficking and ensure the protection of victims. In some cases, this is complemented by extensive training for law enforcement and judicial personnel, which is crucial in equipping those on the front lines with the knowledge and skills needed to handle trafficking cases with the necessary sensitivity and expertise.

Public awareness and prevention efforts are similarly prioritized across these countries. Raising awareness about the dangers and signs of trafficking through campaigns, education, and public initiatives is a shared strategy aimed at preventing trafficking from occurring in the first place. These efforts target vulnerable groups as well as the general public, ensuring that the risks of trafficking are widely understood and that potential victims are better equipped to recognise and avoid exploitative situations.



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3.5.2 Country-specific good practices

While these shared practices form a strong foundation in the fight against trafficking, the differences in approach highlight the importance of context-specific strategies.

Technological innovation is a key area in which Germany and Romania have taken significant steps. Germany's ViContact 2.0 project, which uses virtual environments for professional training, and Romania's introduction of GRIFFEY software for cyber forensic analysis demonstrate how these countries leverage technology to enhance their anti-trafficking efforts.⁸² ⁸³ These innovations not only improve the identification and prosecution of traffickers but also ensure that support for victims is more effectively tailored to their needs.

Specialised institutions and procedures further distinguish Bulgaria's and Slovenia's approaches. Bulgaria has established a cyber unit within its National Investigative Service to address the growing challenge of online recruitment and exploitation.⁸⁴ At the same

⁸² Digitalisierung des Menschenhandels – KOK-Studie identifiziert große Herausforderungen für Strafverfolgung und Fachberatungsstellen. KOK gegen Menschenhandel

⁸³ Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings (2023) Report submitted by the authorities of Romania on measures taken to comply with Committee of the Parties Recommendation CP/Rec(2021)05 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings. Third evaluation round - <https://rm.coe.int/report-submitted-by-the-authorities-of-romania-on-measures-taken-to-co/1680aba92d>

⁸⁴ <https://www.state.gov/reports/2023-trafficking-in-persons-report/bulgaria/>

time, Slovenia has issued comprehensive guidelines for labour inspectors to identify and assist trafficking victims.⁸⁵ These targeted approaches allow each country to address specific national challenges more effectively, whether by focusing on online trafficking or enhancing the role of labour inspectors in preventing forced labour.

Financial and legal measures vary between countries, with Germany and Slovenia mainly focused on financial investigations. Germany's efforts are centred on the role of the Financial Control of Undeclared Labour, while Slovenia emphasises the importance of tracing financial networks and ensuring compliance within the private sector.^{86 87} These measures are crucial in dismantling the economic foundations of trafficking operations, making it harder for traffickers to profit from exploitation.

Victim protection and support systems are another area where differences are evident. Romania and Poland have made notable progress in enhancing victim protection, with Romania establishing private hearing rooms for child victims and Poland utilizing

⁸⁵ Semi-structured interview with a law enforcement officer in Slovenia, part of the ERADICATING II project: May 2024.

⁸⁶ Deutsches Institut für Menschenrechte (2016). Die Umsetzung ausgewählter OSZE-Verpflichtungen zu Menschenrechten und Demokratie in Deutschland. Unabhängiger Evaluierungsbericht anlässlich des deutschen OSZE-Vorsitzes 2016. 2. Edition.

⁸⁷ Semi-structured interview with a law enforcement officer in Slovenia, part of the ERADICATING II project: May 2024.



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European Protection Orders to safeguard trafficking survivors.^{88 89} These initiatives reflect a deep commitment to ensuring that victims are supported and protected from further harm, particularly during legal proceedings.

International and regional cooperation is especially significant in Slovenia and Bulgaria, where efforts have been tailored to address specific cross-border challenges. Slovenia has proactively fostered regional cooperation within the Western Balkans, while Bulgaria has focused on collaborating with neighbouring countries like Turkey and Greece.^{90 91} These regional partnerships are vital in addressing the transnational aspects of trafficking and ensuring that efforts to combat exploitation are coordinated across borders.

In conclusion, while the shared practices among Bulgaria, Germany, Greece, Poland, Romania, and Slovenia highlight a collective commitment to combating human trafficking through cooperation, victim support, and robust legal frameworks, the differences in their

⁸⁸ Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings (2023) Report submitted by the authorities of Romania on measures taken to comply with Committee of the Parties Recommendation CP/Rec(2021)05 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings. Third evaluation round - <https://rm.coe.int/report-submitted-by-the-authorities-of-romania-on-measures-taken-to-co/1680aba92d>

⁸⁹ National Action Plan against Trafficking in Human Beings for 2022-2024.

⁹⁰ Semi-structured interview with a state agency representative in Bulgaria, part of the ERADICATING II project: April 2024.

⁹¹ Focus group with law enforcement officers in Slovenia, part of the ERADICATING II project: April 2024.



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approaches underscore the necessity of context-specific strategies. Each country has tailored its efforts to address unique challenges through technological innovation, specialised institutions, or regional cooperation. These diverse yet complementary approaches contribute to a comprehensive and multifaceted global effort against human trafficking, demonstrating the importance of adaptability and collaboration in the ongoing fight to protect vulnerable individuals from exploitation.

3.6 Future good practices/ general recommendations

Addressing the complex and multifaceted challenges of human trafficking for labour exploitation requires a comprehensive, cohesive approach that considers both commonalities and specific obstacles unique to each country. This stated several overarching themes emerged from the analysis highlighting the need for continuous and specialised training, stronger inter-agency cooperation, and enhanced victim support mechanisms. The role of technology, both as a challenge and an opportunity, is central to future anti-trafficking efforts, and public awareness remains a critical element in the prevention of trafficking.

Based on the ERADICATING II Report's findings, several key actions are recommended for all participating states:

1. **Continuous specialised training:** Developing and implementing ongoing training programs for law enforcement, judicial personnel, and frontline practitioners is essential. These programs should cover the intricacies of labour exploitation, the growing issue of digital trafficking, and the adoption of victim-centred approaches that ensure the safety and dignity of victims throughout the process.



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2. **Inter-agency cooperation:** Strengthening inter-agency cooperation through structured communication frameworks and joint protocols will ensure that resources are efficiently shared and responses well-coordinated. Regular joint exercises and training sessions involving all relevant stakeholders will help streamline efforts.
3. **Legislative reforms:** Clarifying the distinctions between labour law violations and human trafficking and enforcing stricter penalties for traffickers is necessary to ensure the legal framework is robust enough to combat trafficking effectively. Closing legal loopholes that traffickers exploit, particularly in digital and cross-border cases, should be a priority.
4. **Victim compensation fund:** Establishing a victim compensation fund supported by assets confiscated from traffickers will provide sustainable funding for victim services. This will ensure victims receive the long-term care they need to recover and reintegrate into society.
5. **Public awareness campaigns:** Raising public awareness through targeted campaigns, mainly aimed at vulnerable groups such as migrants and refugees, will help prevent trafficking and encourage early identification of cases. Public education campaigns can also foster a greater sense of community responsibility in the fight against trafficking.

In accordance with these recommendations, designing specialised training toolkits and simulation scenarios is essential. These tools should provide stakeholders practical skills and knowledge in digital forensics, legal frameworks, victim-centred approaches, and inter-agency cooperation. Simulation scenarios should offer hands-on experience in dealing with trafficking cases, focusing on key areas such as victim identification and



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rescue operations, digital crime investigations, multi-agency coordination, victim interviewing techniques, and crisis response management.

By implementing these recommendations, countries can significantly improve their capacity to detect, prevent, and prosecute trafficking cases. This will enhance the protection and support available to victims and ensure a more coordinated, effective response to this critical global issue.





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3.7 Suggested activity for the chapter

Table 4. Identifying victims of trafficking in labour exploitation

Activity Name	Identifying victims of trafficking in labour exploitation
Type of Activity	Guided small group brainstorm and discussion
Duration	35-40 Minutes
Learning Objectives	<ul style="list-style-type: none"> • Build an understanding of the critical signs that identify victims of human trafficking. • Identify and produce guiding questions that may lead to the identification of key indicators.
Materials Needed	<ul style="list-style-type: none"> • Pens/Pencils • Handout 1: Croatian Red Cross Human Trafficking Indicators: General Indicators • Handout 2: Guiding Interview Questions
Activity Break Down	<ul style="list-style-type: none"> • Explanation of the purpose of the activity/task. (1-2 mins) <p>Attendees will be asked to write down ideas for the following question: 'What are some indicators of human trafficking?'</p>

	<p>More specifically, what are some indicators linked to labour exploitation?’ (5 mins)</p> <ul style="list-style-type: none"> • A brief opportunity to share some examples as a group. (5 mins) • Provide Handout 1: Croatian Red Cross Human Trafficking Indicators: General Indicators & Indicators Linked to Labour Exploitation. Attendees will be given time to review Handout 1. (2 mins) • Provide Handout 2: Guiding Interview Questions. Explanation of the purpose of the handout: What guiding interview questions could lead to discovering indicators linked to human trafficking and labour exploitation? (2 mins) • Attendees will be asked to fill in blanks based on the indicators provided. (8 mins) • Post-activity Collaboration: Share answers. Are there additional questions that could be effective? Could any of these be built upon? First-hand experience of questions that have or have not been effective? (10 minutes)
<p>References</p>	<p>Human Trafficking Indicators linked to Labour exploitation provided by the Croatian Red Cross, <u>The identification of victims of human trafficking in transit and destination countries in Europe: A practical guideline for frontline workers.</u></p>



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3.7.1 Handout 1: Identifying victims of trafficking in labour exploitation

Croatian Red Cross Human Trafficking Indicators: General indicators

Table 5. Croatian Red Cross Human Trafficking Indicators: General indicators

Migration Experience
Remains in a transit country for a long time (Libya, Turkey, Italy, Bulgaria, Croatia, France, Serbia, Greece, Bosnia and Herzegovina)
Has unrealistic or false expectations about life in the country of destination, has been deceived by false promises
Inconsistencies in the description of the migratory journey, blanks in the story, lack of awareness of the travel route from place of origin to destination
Changing her/his migration story, evasiveness, denial, minimising the situation, telling exactly the same story as other migrants from the same area
Significant debt to smugglers, the debt is higher than agreed or increases with time
Not knowing what country they are in
Daily Life Linked to Exploitation



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Lifestyle contrasting with their social situation: expensive phone or belongings, dresses above their financial resources
Person often leaves the accommodation in different cars or with different people, or is unable to leave his/her workplace
Offset rhythm of life: sleep schedule, punctuality at appointment and/or missed appointment, repeated and unjustified absences, etc., resulting in fatigue and concentration problem
Has a lot of money in cash
Does not appear to worry or ask questions about accommodation solutions
Is present in a place commonly known to be a place of exploitation
Regularly changes housing
Neighbourhood (or guardian) complaining, for instance about noise, too many people visiting or any other element that could indicate sex work or suspicion of criminal activities
Receives social benefits or payments but is told to hand it over to another person and/or does not have access to the benefits him/herself
Means of Control Used by Traffickers



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Always accompanied by a person or a group, reluctant to one-to-one interviews (for minors, permanent accompaniment by adults and prohibition to speak to unknown adults)
Signs of control by another person (limited freedom of movement, someone else possesses the person's personal documents or s/he has been given false documents)
It seems that the person previously received instructions on what to say
Incessant phone calls, owns multiple phones
Cannot speak alone, always be accompanied by someone who speaks in their place
Is told to sign a contract with companies that provide services (financial, telecommunications services) or offer goods (car, mobile phones etc.), and is forced to hand it over to another person and does not benefit from these services or goods
Seems to be engaged in an unhealthy or abusive relationship with her/his partner
Observable Signs
Hyper vigilant/suspicious
Extreme and/or inappropriate behaviour with others
Shortens interactions and appointments, and shows distrust in authorities
Attitude of avoidance: looks away, avoids authorities and does not want to report any violation committed against her/him



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Show signs that her/his movements are being watched, constantly looks at someone who seem to be watching her/him
Addictions to various substances
Negative feelings affecting her/his behaviour (anxious, frightened, isolated, ashamed, hopeless, guilty) and reluctant to talk about it
Signs of visible injuries (bruises, cuts, burns, specific tattoos, work related injuries etc.) without previous access to medical care to treat them, reluctant or unable to explain how s/he had been hurt

Croatian Red Cross Human Trafficking Indicators: Linked to Labour Exploitation

Table 6. Croatian Red Cross Human Trafficking Indicators: Linked to labour exploitation

Migration Experience
A job was offered to her/him in the country of destination with a good salary and very attractive working conditions
Asks questions about work permit applications
Does not know which country s/he is in
Daily Life Linked to Exploitation



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Is denied breaks, days off, and free time
Has to work even when sick or pregnant
Does not receive a salary or a very limited one
Is not provided with pay slips, employment contracts, insurance
A significant number of migrants are accommodated in the same place
Lives and sleeps in her/his workplace
Working conditions (legal and economic) are well below the standards of the host country (dangerous working conditions, no access to a medical service)
Is paid on a piece-rate (results) basis and must work overtime in order to earn the legal minimum wage
Is dependent on her/his employer for transportation and accommodation
Is in a situation of multiple dependency (e.g. reliant on the employer for accommodation, food or other benefits)
Means of Control Used by Traffickers
Identity documents or other valuable personal effects are kept by the employer or an intermediary
Provides evidence of being unable to move or leave job



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Is sanctioned at work with the use of violence
Suffers sexual or other forms of violence for purposes of submission and control
Entrances and exits are guarded
There is an inaccessible fence around the premises (e.g. too high or surrounded by barbed wire)
A curfew is in place
The workplace is difficult/impossible to reach by public or private transportation or for other reasons (e.g. private household, unregistered business)
Observable Signs
Work related injuries due to dangerous conditions and/or lack of safety equipment
Untreated injuries

Human Trafficking Indicators linked to Labour exploitation provided by the Croatian Red Cross, *The identification of victims of human trafficking in transit and destination countries in Europe: A practical guideline for frontline workers.*

3.7.2 Handout 2: Identifying victims of trafficking in labour exploitation

Guiding interview questions

Table 7. Guiding interview questions

Question(s)	Indicator
Migration Experience	
How did you get to this country? What happened since you left your country? What other countries did you cross before arriving here?	Inconsistencies in the description of the migratory journey, blanks in the story, lack of awareness of the travel route from place of origin to destination
How did you pay for the travel costs?	Significant debt to smugglers, the debt is higher than agreed or increases with time
	Not knowing what country they are in
	Changing her/his migration story, evasiveness, denial, minimising the

	situation, telling exactly the same story as other migrants from the same area
	Asks questions about work permit applications
Daily Life Linked to Exploitation	
Are you allowed to take breaks or day-off, for instance when you are sick?	Working conditions (legal and economic) are well below the standards of the host country (dangerous working conditions, no access to a medical service)
Does someone prevent you from going to organisations or social services?	Is dependent on her/his employer for transportation and accommodation
	Is paid on a piece-rate (results) basis and must work overtime in order to earn the legal minimum wage
	Is not provided with pay slips, employment contracts, insurance
	A significant number of migrants are accommodated in the same place

	Lives and sleeps in her/his workplace
Means of Control Used by Traffickers	
Do you have any papers/work permit? Has anyone taken and kept your personal documents such as identity document or passport?	Identity documents or other valuable personal effects are kept by the employer or an intermediary
Can you describe your work conditions?	Entrances and exits are guarded
	Provides evidence of being unable to move or leave job
	The workplace is difficult/impossible to reach by public or private transportation or for other reasons (e.g. private household, unregistered business)
Observable Signs	



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	Work related injuries due to dangerous conditions and/or lack of safety equipment/untreated injuries
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3.8 Reflections

Addressing the complex and multifaceted challenges of human trafficking for labour exploitation requires a comprehensive, cohesive approach that considers both commonalities and specific obstacles unique to each country.

This stated, the research shared in this chapter highlights the importance of integrating continuous training, legislative reforms, enhanced cooperation, and public awareness into a long-term strategy for combating human trafficking. By addressing the systemic and operational challenges, countries can strengthen their anti-trafficking efforts and ensure that victims receive the care and protection they need and deserve.