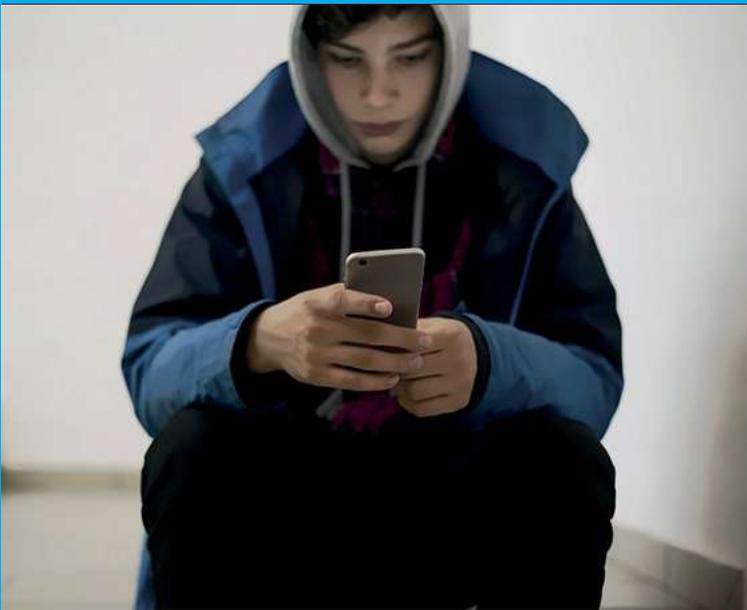


11th GENERAL REPORT ON GRETA'S ACTIVITIES



GRETA
Group of Experts
on Action against
Trafficking
in Human Beings

covering the period from
1 January to 31 December 2021



COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

11th GENERAL REPORT ON GRETA'S ACTIVITIES

GRETA
Group of Experts
on Action against Trafficking
in Human Beings

covering the period from 1 January
to 31 December 2021

French edition:

*11^e Rapport Général
sur les activités du GRETA*

The reproduction of extracts (up to 500 words) is authorised, except for commercial purposes as long as the integrity of the text is preserved, the excerpt is not used out of context, does not provide incomplete information or does not otherwise mislead the reader as to the nature, scope or content of the text. The source text must always be acknowledged as follows “© Council of Europe, year of the publication”. All other requests concerning the reproduction/translation of all or part of the document, should be addressed to the Directorate of Communications, Council of Europe (F-67075 Strasbourg Cedex or publishing@coe.int). All other correspondence concerning this document should be addressed to the Secretariat of the Council of Europe Convention on Action against Trafficking in Human Beings Council of Europe, F-67075 Strasbourg Cedex, France
E-mail: trafficking@coe.int

Cover and layout: Document and Publications
Production Department (SPDP), Council of Europe
Photos: Shutterstock

This publication has not been copy-edited
to correct typographical and grammatical errors.

© Council of Europe, July 2022
Printed at the Council of Europe

Contents

INTRODUCTION BY THE PRESIDENT OF GRETA	5
ACTIVITIES DURING THE PERIOD FROM 1 JANUARY TO 31 DECEMBER 2021	9
Introduction	9
GRETA meetings	10
Country visits and evaluations	11
Preparation of a draft recommendation of the Committee of Ministers on preventing and combating trafficking in human beings for the purpose of labour exploitation	12
GRETA MEMBERSHIP AND BUREAU	14
SIGNATURES AND RATIFICATIONS OF THE CONVENTION	15
VISIBILITY AND IMPACT OF THE MONITORING PROCESS	16
Publicity of GRETA's reports	16
Practical impact of GRETA's monitoring work	18
Activities related to the implementation of GRETA's recommendations	21
Conferences focusing on child trafficking	23
New HELP online module on combating human trafficking for the purpose of labour exploitation	24
MEETING OF NATIONAL ANTI-TRAFFICKING CO-ORDINATORS AND RAPORTEURS	25
RELATIONS WITH THE COMMITTEE OF THE PARTIES	27
CO-OPERATION WITH COUNCIL OF EUROPE BODIES	29
European Court of Human Rights	29
Other Council of Europe bodies	31
CO-OPERATION WITH OTHER INTERGOVERNMENTAL ORGANISATIONS	33
United Nations	33
Inter-Agency Co-ordination Group against Trafficking in Persons (ICAT)	34
OSCE/ODIHR	34
European Union	35
Council of Baltic Sea States	35
CO-OPERATION WITH CIVIL SOCIETY	36
ONLINE AND TECHNOLOGY-FACILITATED TRAFFICKING IN HUMAN BEINGS	39
Methodology of the study	40
The impact of technology on trafficking in human beings	40
Challenges in detecting, investigating and prosecuting technology-facilitated THB	42
Strategies and good practices	48
Training: what is provided, what is needed	52
Legal instruments	53
Human rights, ethics and data protection	56
Recommendations	58
APPENDIX 1	62
Chart of signatures and ratifications of the Council of Europe Convention on Action against Trafficking in Human Beings Status as of 31/12/2021	

APPENDIX 2		64
	GRETA's field of operations	
	States bound by the Convention	64
APPENDIX 3		65
	List of GRETA members (as at 31 December 2021)	65
APPENDIX 4		66
	Secretariat of the Council of Europe Convention on Action against Trafficking in Human Beings (as at 31 December 2021)	66
APPENDIX 5		67
	List of GRETA's activities during the period 1 January to 31 December 2021	67
APPENDIX 6		68
	List of activities organised to support the implementation of GRETA's recommendations during the period 1 January to 31 December 2021	68
APPENDIX 7		71
	Updated provisional timetable of GRETA's 3rd Evaluation Round	71
APPENDIX 8		72
	Participation of GRETA members and Secretariat in events in the area of action against trafficking in human beings	72
APPENDIX 9		75
	Workflow of the monitoring mechanism of the Council of Europe Anti-Trafficking Convention	75

COUNCIL OF EUROPE CONVENTION ON ACTION AGAINST TRAFFICKING IN HUMAN BEINGS



Introduction by the President of GRETA

It is my pleasure and privilege to introduce the 11th 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 2021.

The year 2021 saw a further expansion of the geographical area of application of the Convention on Action against Trafficking in Human Beings, with the accession of Israel, the first non-European country to join the Convention. This is an important step forward in our common effort to prevent and combat trafficking in human beings, and I hope that it will be followed by more accessions by countries beyond Europe.

The COVID-19 pandemic continued to have a negative impact on GRETA's work throughout 2021, but did not prevent us from achieving a number of important milestones. GRETA revised the timetable of its evaluation visits and introduced a greater flexibility in the composition of its visiting delegations and adaptability to changes of dates of visits. As a result, GRETA managed to carry out 10 country evaluation visits, including six which had been postponed from 2020.

GRETA's monitoring shows that **child trafficking** has continued to increase, despite legislative and practical measures taken by States Parties to the Convention, and the COVID-19 pandemic has made children even more vulnerable to trafficking, including to exploitation online. The conference organised during the German Presidency of

the Committee of Ministers of the Council of Europe was an opportunity to discuss challenges and present innovative approaches which can have a positive impact on combating child trafficking. The THB LIBERI project, led by the German Federal Criminal Police Office, was reflected in the three main themes of the conference: exploitation of children and young persons through the Internet, exploitation of children and young persons by family structures, and strengthening child and young persons' testimonies.

This year's General Report zooms in on the **impact of information and communication technology (ICT) on trafficking in human beings**. Countries monitored by GRETA have reported an increased use of ICT for recruiting and controlling victims of trafficking. At the same time, the evidence base on ICT-facilitated human trafficking remains limited and patchy, which is why GRETA launched a study in 2021, based on questionnaires sent to State Parties to the Convention, NGOs and tech companies. A summary of the resulting report and recommendations is reproduced in the General Report. ICT has produced structural changes in the way offenders operate, which require countries to adapt and equip their law enforcement agencies and criminal justice systems with capabilities in step with the changing environment. The challenges posed by technology on the investigation of human trafficking cases include data encryption, large volumes of data, speed of technological change, and lack of technical equipment. As regards challenges in the process of prosecution, obtaining evidence from other countries is cited the most often, followed by lack of training, inadequate legislative tools and insufficient assistance from the private sector. Conclusions can be drawn to indicate that it is essential to invest in human capital, enhance co-operation with private companies, and strengthen international co-operation.

In 2021, the corpus of **judgements of the European Court of Human Rights relevant to trafficking in human beings** has significantly grown. The Convention and GRETA's reports are used by the Court as a tool to interpret the European Convention on Human Rights (ECHR) when issuing judgments related to states' legal obligations to prevent and combat trafficking in human beings. I would like to refer in particular to the case *V.C.L. and A.N. v. United Kingdom*, in which the Court discussed the non-punishment provision and found that the authorities' failure to conduct a timely assessment of whether the applicants had been trafficked amounted to a breach of their positive obligations under Article 4 of the ECHR. In the context of Article 6 of the ECHR, the Court considered that the lack of such an assessment prevented them from securing evidence which may have constituted a fundamental aspect of their defence.

In 2021, GRETA continued to tackle the matter of **trafficking in human beings in the context of migration**, little knowing at that point to what extent this topic would gain in relevance in 2022 with the massive displacement of people fleeing the armed conflict in Ukraine. The exchange of views with the Special Representative of the Secretary General for Migration and Refugees, Ambassador Drahoslav Štefánek, during GRETA's 41st meeting focused, amongst other things, on human rights violations related to pushbacks. GRETA continues to stress that pushbacks negatively affect the detection of victims of trafficking amongst irregular migrants and asylum seekers and raise grave concerns as regards State Parties' compliance with certain

obligations of the Convention, including the positive obligations to identify victims of trafficking and to refer them to assistance, and to conduct a pre-removal risk assessment to ensure compliance with the obligation of *non-refoulement*.

The 131st Session of the Committee of Ministers, held in Hamburg, highlighted the importance of strengthening **synergies and co-ordination** between Council of Europe monitoring bodies. I would like to underline that GRETA has been particularly attentive to this and has held periodic exchanges with other monitoring bodies, including with the Council of Europe's Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) in 2021. We shall continue to explore ways for co-ordinating and mutually reinforcing the impact of our work, while avoiding duplication.

At the international level, GRETA has continued developing links and forging partnerships with European Union and United Nations agencies, the Council of Baltic Sea States, ICMPD and OSCE.

In 2021, the composition of GRETA was partially renewed. I would like to warmly thank the previous GRETA President, Mr Davor Derenčinović, and the other former GRETA members for their commitment and contribution to the monitoring of the implementation of the Convention and promoting the Convention's provisions and GRETA's work. I would also like to acknowledge the remarkable efforts made by the Secretariat, led by Ms Petya Nestorova, to ensure that GRETA's programme of activities in 2021 was carried out successfully, despite the challenges posed by the COVID-19 pandemic. Finally, I would like to express my gratitude to all the national contact persons who greatly facilitated GRETA's task by enabling the organisation of country visits and the collection of the necessary information.

Helga Gayer
President of GRETA



GRETA evaluation visit to Belgium (3rd evaluation round), 25-29 October 2021

Activities during the period from 1 January to 31 December 2021

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 the first election of GRETA members by the Committee of the Parties to the Convention in December 2008. GRETA is currently the only independent panel of experts monitoring the implementation of binding international legal provisions on combating trafficking in human beings.
2. As concerns its working methods, GRETA evaluates the implementation of the Convention by the Parties following a procedure divided into rounds. In carrying out its monitoring work, GRETA has the right to avail itself of a variety of means for collecting information. As a first step, GRETA sends a questionnaire to the authorities of the Party undergoing evaluation. The questionnaire is also sent to non-governmental organisations (NGOs) active in the field of action against trafficking in human beings. After receiving the authorities’ reply to its questionnaire, GRETA organises a visit to the country concerned in order to hold meetings with relevant governmental and non-governmental actors, collect additional information and evaluate the practical implementation of adopted measures.

3. Following the country visit, GRETA draws up a draft evaluation report containing an analysis of the implementation of the Convention and conclusions concerning the action which the Party needs to take to deal with any problems identified. The draft report is discussed in a plenary meeting and, following its approval by GRETA, is sent to the national authorities for comments. Following the receipt and consideration of these comments, GRETA draws up a final report, which is discussed and adopted in another plenary session, and subsequently transmitted to the Party concerned, as well as to the Committee of the Parties to the Convention. GRETA's final report is made public together with any final comments by the Party concerned. The Committee of the Parties to the Convention considers GRETA's reports and, on the basis of those reports, adopts recommendations to the governments of the Parties concerned (for a workflow of the monitoring mechanism of the Convention, see Appendix 9).
4. On the basis of GRETA's reports and recommendations, the Council of Europe assists member states to strengthen the implementation of the Convention through projects funded from the organisation's ordinary budget or external sources.

GRETA meetings

5. The COVID-19 pandemic continued to have an impact on GRETA's work throughout 2021, due to the sanitary, travel and meeting restrictions. During the reporting period, GRETA held three plenary meetings, all of which took place in a hybrid format, with some GRETA members and the Secretariat being physically present in Strasbourg, and other GRETA members joining by conference call. There is a consensus among GRETA members that physical meetings are preferable because the level of participation and the input received are better, contentious issues can be resolved quicker, and a better team spirit can be achieved. This is particularly true when new members join GRETA for the first time, which was the case in 2021.
6. Due to the constraints of hybrid meetings, the number of agenda items that could be addressed at each meeting was restricted, priority being given to the discussion and adoption of country evaluation reports. With a view to making efficient use of the meeting time, GRETA made adjustments to its working methods and adapted its internal procedure for discussing and adopting country reports.
7. At the three meetings held in 2021, GRETA discussed draft reports and adopted final reports in respect of six countries, as part of the third evaluation round of the Convention (France, Latvia, Malta, Montenegro, Romania and the United Kingdom). Further, at its 42nd meeting, GRETA considered four draft reports, concerning Armenia, Bosnia and Herzegovina, Norway and Portugal, which were sent to the national authorities for comments with a view to being adopted as final reports in March 2022.
8. In addition, at the 40th meeting (22-26 March 2021), GRETA considered the draft second report on the compliance of Kosovo*¹ with the standards of the Council of Europe Convention on Action against Trafficking in Human Beings, prepared as part

1 ** All references to Kosovo, whether the territory, institutions or population, in this text shall be understood in full compliance with United Nation's Security Council Resolution 1244 and without prejudice to the status of Kosovo.*

of a project funded through a voluntary contribution. The final report on Kosovo* was adopted by GRETA at its 41st meeting.

9. During its meetings, GRETA also discussed a number of procedural and substantive issues, including the application of the provisions of the Convention in the context of armed conflicts, the links between trafficking and terrorism, and the use of information and communication technology (ICT) to commit human trafficking (see paragraph 94 and following).

10. Furthermore, GRETA's plenary meetings were an occasion to hold exchanges with representatives of relevant Council of Europe structures and other international organisations on issues of relevance to GRETA's mandate. Thus, at its the 41st meeting (5-8 July 2021), GRETA held exchanges of views with Ms Simona Lanzoni, 1st Vice-President of the Group of Experts on Action on Violence against Women and Domestic Violence (GREVIO), and Ms Johanna Nelles, Executive Secretary of GREVIO (see paragraph 66), as well as with the Special Representative of the Secretary General on Migration and Refugees, Ambassador Drahoslav Štefánek (see paragraph 67). At the same meeting, Mr Martin Fowke and Mr Antonio De Vivo from the UNODC presented the review mechanism for the implementation of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime. At its 42nd meeting (22-26 November 2021), GRETA exchanged with Dr Paolo Campana on the preparation of the study on online and technology-facilitated trafficking in human beings (see paragraph 95).

11. During the reporting period, GRETA received a number of communications from victims of trafficking, lawyers and civil society organisations 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

12. The very limited possibility to carry out physical visits in 2020 as a result of the sanitary and travel restrictions imposed by the COVID-19 pandemic led to a delay in the preparation and adoption of GRETA reports. To cope with the impact of the pandemic, GRETA revised the timetable of its evaluation visits and introduced a greater flexibility in the composition of visiting delegations and adaptability to changes of dates of visits.

13. Despite the continuing sanitary and travel restrictions related to the COVID-19 pandemic, GRETA managed to carry out 10 country evaluation visits in 2021, including six which had been postponed from 2020. Nine of the evaluation visits were part of the third round of evaluation of the Convention: in chronological order, to France (8-12 February), Portugal (14-18 June), Armenia (6-10 September), Bosnia and Herzegovina (6-10 September), Norway (20-24 September), Latvia (11-12



GRETA evaluation visit to Latvia (3rd evaluation round), 11-12 October 2021

October),² Belgium (25-29 October), Luxembourg (26-29 October) and Ireland (6-10 December). Further, a second round evaluation visit was carried out to Belarus (27 September - 1 October).

14. GRETA notes that physical visits are indispensable for a proper evaluation of the situation and the preparation of reports. The decision taken by the Committee of Ministers to grant GRETA's Secretariat one additional staff member as of the beginning of 2022 should enable GRETA to get back on track on its monitoring visits calendar over the next three years.

Preparation of a draft recommendation of the Committee of Ministers on preventing and combating trafficking in human beings for the purpose of labour exploitation

15. Trafficking in human beings for the purpose of labour exploitation was identified as one of the major challenges for Europe in the report by the former Secretary General of the Council of Europe, "Ready for Future Challenges - Reinforcing the Council of Europe"³ At the 129th Ministerial Session on 17 May 2019 in Helsinki, the Committee of Ministers agreed to continue analysing the protection provided by existing European standards with a view to identifying gaps and developing sector-specific recommendations, guidelines and codes of conduct, as well as, if required, other instruments, and instructed its Deputies to examine ways of strengthening action against trafficking in human beings.⁴ In November 2019, the Secretary General presented to the Committee of Ministers a "Roadmap on strengthening action against trafficking in human beings for the purpose of labour exploitation"⁵

2 In order to prepare its third report on Latvia, GRETA had previously held online meetings with stakeholders in Latvia, in December 2020, but decided to organise a physical visit in October 2021 order to collect additional, updated information.

3 Available at: https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=090000168093af03

4 [CM/Del/Dec\(2019\)129/2a](https://www.coe.int/t/press/CM/Del/Dec(2019)129/2a)

5 [SG/Inf\(2019\)34](https://www.coe.int/t/press/SG/Inf(2019)34)

16. In April 2021, the Committee of Ministers decided to set up the Drafting Committee on Trafficking for the Purpose of Labour Exploitation (DH-TET), under the authority of the Steering Committee for Human Rights (CDDH), to prepare a draft recommendation of the Committee of Ministers on preventing and combating trafficking in human beings for the purpose of labour exploitation. The new recommendation is expected to draw on GRETA's Compendium of Good Practices and Guidance Note on Preventing and Combating Trafficking for the Purpose of Labour Exploitation,⁶ and the case-law of the European Court of Human Rights and the European Committee on Social Rights.

17. Pursuant to the terms of reference of DH-TET, it is composed of 15 members with established expertise in the fields of preventing and combating trafficking in human beings, identification, assistance and protection of victims of trafficking, labour rights and human rights, comprising 10 member States' representatives, five of which designated by the Steering Committee for Human Rights (CDDH), four by the European Committee on Crime Problems (CDPC) and one by the Governmental Committee of the European Social Charter and the European Code of Social Security, and five independent experts, appointed by the Secretary General. A number of Council of Europe bodies, including GRETA, are entitled to participate in the meetings of DH-TET. GRETA agreed that it will be represented at the DH-TET meetings, depending on their availability, by Ms Conny Rijken, Mr Peter van Heuwermeiren and Ms la Dadunashvili. GRETA and its Secretariat contributed actively to the preparation of the draft recommendation and participated in the meetings of DH-TET.

6 <https://rm.coe.int/guidance-note-on-preventing-and-combating-trafficking-in-human-beings-/1680a1060c>
<https://rm.coe.int/mpendium-of-good-practices-in-addressing-trafficking-in-human-beings-f/16809f9bef>



GRETA's Bureau members. From left to right : Julia Planitzer, Second Vice-President, Helga Gayer, President, Antoaneta Vassileva, First Vice-President

GRETA membership and Bureau

18. In 2021, the composition of GRETA was partially renewed, following the elections of eight GRETA members by the Committee of the Parties to the Convention on 4 December 2020. As a result of these elections, two GRETA members were re-elected for a second term of office, and six new members were elected. The mandates of these eight members will run from 1 January 2021 until 31 December 2024. An online induction meeting for the new GRETA members took place on 22 March 2021.

19. Further, following the resignation of one GRETA member, an election to fill the vacant seat was held at the 28th meeting of the Committee of the Parties, on 4 June 2021. The Committee elected Ms Svala Ísfield Ólafsdóttir (Icelandic) for a first term of office running until 31 December 2022.

20. At the 40th meeting (22-26 March 2021), GRETA elected its new Bureau for the next two-year period. Ms Helga Gayer was elected as GRETA's President, Ms Antoaneta Vassileva as First Vice-President, and Ms Julia Planitzer as Second Vice-President. The Bureau held periodic online meetings concerning the organisation of GRETA's work.

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



Signatures and ratifications of the Convention

22. Following the acceptance by the member states of the Council of Europe and non-member states Parties to the Convention of the request made by the Government of the State of Israel to accede to the Convention, Israel became the 48th country to become a Party to the Convention on 28 May 2021. The Convention entered into force as regards Israel on 1 September 2021.
23. 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.
24. Through their participation in various events, GRETA members and Secretariat have continued promoting the Convention's standards (see Appendix 6). The Convention also serves as the basis for co-operation projects in Morocco and Tunisia.⁷



Visibility and impact of the monitoring process

Publicity of GRETA's reports

25. 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. During the reporting period, seven GRETA country evaluation reports were published (see Appendix 5)⁸ concerning Bulgaria, Denmark, Georgia, Malta, Montenegro, Romania and the United Kingdom. Two more reports, concerning France and Latvia, were adopted at GRETA's 42nd meeting, and were published in early 2022.

26. 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.

27. In mid-January, Georgian national outlets (*Prime News, Agenda.ge, Georgia Today, Civil Georgia*) examined GRETA's third report on **Georgia**, highlighting that despite progress achieved in fighting human trafficking, victim identification and the criminal justice response must be improved.

28. The Danish media (*Jyllands Posten, Ritzau, Kristeligt Dagblad, Berlingske*) reported in March on GRETA's third report on **Denmark**, stressing the need to improve the identification and protection of victims of trafficking, as well as bringing traffickers to justice.

⁸ There is a time lag between the adoption and the publication of GRETA reports, due to the fact that GRETA awaits the receipt of the national authorities' final comments before publishing a country evaluation report.

29. **GRETA's 10th general report**, issued in April 2021, received substantial Europe-wide coverage (*AFP, Reuters, EFE, The Inquirer, Agence Europe, L'Humanite, Europa Press, Publico, La Rioja, L'Expression, Agencia Lusa, Observador, Sapo.pt, Affaritaliani.it, Agerpres, News.ru, Interfax, Lovin Malta, Alpha TV, Athens News Agency, etc.*), with most sources highlighting GRETA's call on member states to address the increase in human trafficking linked to the Covid-19 pandemic.

30. Later the same month, GRETA's report on **Bulgaria** hit national headlines (*BTA, BNT, Bulgariaonair.bg, Monitor, Sega, News.bg, Darik News, Politika.bg, Sofia News Agency, etc.*). Articles and interviews highlighted GRETA's concerns about the low number of compensation awards to victims of trafficking and the absence of effective sentences, which undermines efforts to support victims to testify.

31. In June, GRETA's report on **Montenegro** was widely covered (*CdM, Radio Slobodna Evropa, The Balkan Insight, BETA, Pobjeda, BNE Intellinews, etc.*), giving prominence to GRETA's call on the authorities to improve victim's access to compensation and to strengthen the criminal justice response to human trafficking.

32. GRETA's report on **Romania**, also published in June, was covered by Romanian and international media outlets (*AFP, Agence Europe, EurActiv, Les Echos, Agerpres, TVR, Adevarul, Antena3, Universul, ACTMedia, etc.*), which pointed out that the authorities need to prosecute human traffickers more vigorously and to guarantee access to compensation for victims.

33. GRETA's report on the **United Kingdom**, published in October, was analysed in several articles (*Politico, The Guardian, The London Economic, The National*), which highlighted that the number of potential human trafficking victims had increased by almost tenfold in less than a decade.

34. Also in October, the Maltese press (*The Malta Independent, Times of Malta, The Shift News, Newsbook, etc.*) reported that GRETA found in its report on **Malta** that although the country had continued to develop its legislative and policy frameworks against human trafficking, the authorities need to ensure that trafficking cases are investigated proactively and thoroughly.

35. GRETA's anti-trafficking social media accounts on Twitter (@CoE_Trafficking) and LinkedIn (Action against Trafficking in Human Beings) attracted increased numbers of followers, reactions and shares, particularly on and around the World Day against Trafficking in Persons and the European Anti-trafficking Day (30 July and 18 October, respectively). Both platforms have proved to be useful methods for exchange, highlighting not only GRETA's and the Council of Europe anti-trafficking activities, but also for bringing partners' activities to the attention of social media followers.

36. Furthermore, the database HUDOC-GRETA makes accessible to the public all published GRETA country reports, Government comments and GRETA's general reports.⁹ Searching has been made as easy and powerful as possible: users can search for any words, but can also select from pre-established filters and lists of keywords.

9 [HUDOC-GRETA \(coe.int\)](https://hudoc.coe.int)



Practical impact of GRETA's monitoring work

37. Based on GRETA's reports published and finalised in the course of 2021, 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.



Bulgaria

- ▶ To address GRETA's recommendations made in the second report, the authorities carried out a revision and updating of the National Mechanism for Referral and Support to Victims of Trafficking (NRM), which was approved by the Council of Ministers as an official and mandatory document.
- ▶ In the period following the second evaluation by GRETA, the Bulgarian authorities re-opened the two specialised shelters for victims of trafficking, in Burgas and Varna, as well as opening a specialised crisis centre for child victims of trafficking in Sofia.
- ▶ Following GRETA's second report, increased attention was paid to preventing trafficking for the purpose of labour exploitation, through legislative and regulatory changes, awareness raising and training.



Denmark

- ▶ Following GRETA's second report, the Danish Centre against Trafficking in Human Beings (CMM) increased efforts to identify child victims of trafficking amongst asylum seekers and co-operates with the Danish Red Cross to promote such identification.
- ▶ In 2018 a website for victims of trafficking was set up, providing information in seven languages, including a video clip, about giving testimony, legal assistance, protection measures, compensation, and the non-punishment principle.
- ▶ Efforts to detect and combat trafficking for labour exploitation have increased, with the involvement of the Danish Tax Agency's inspectors and the Trade Union 3F.



Georgia

- ▶ In its second evaluation report, GRETA urged the Georgian authorities to increase efforts to proactively identify victims of trafficking for the purpose of labour exploitation, by providing the Labour Inspectorate with the requisite resources and training. The new Law on Labour Inspection specifies that the mandate of the Labour Inspectorate covers forced labour and human trafficking. The number of labour inspectors was increased from 25 to 65, and they were given training on human trafficking.
- ▶ As recommended by GRETA in its second evaluation report, the definition of “abuse of a position of vulnerability” was amended to comply with the Convention.
- ▶ With a view to proactively identifying victims of trafficking among migrants and asylum seekers, the Human Trafficking Council approved guidelines on identification of victims of trafficking at the borders of Georgia, with indicators and standards interview questions. Training was delivered on the implementation of the guidelines.



France

- ▶ As a follow-up to GRETA’s recommendation to set up and maintain a comprehensive and coherent statistical system on trafficking in human beings, an annual survey is carried out to gather data on identified and presumed trafficking victims assisted by NGOs. In addition to these annual surveys, in October 2019 the French authorities published the first overview of data on human trafficking and exploitation.
- ▶ The second national action plan against trafficking in human beings (2019-2021) includes activities reflecting GRETA’s recommendations made in the first and second round reports.
- ▶ A decision to open a specialised centre for child victims of trafficking was published in May 2021. The NGO Koutcha has been selected to set up a centre with 12 places, providing educational, psychological, legal and health support.



Latvia

- ▶ To improve the identification of victims of trafficking, the authorities have set up a multi-disciplinary identification commission (comprising at least one social worker, psychologist and lawyer, representatives of the two specialised NGOs providing services to victims of trafficking, and, if necessary, other specialists).
- ▶ Steps were taken to prevent and detect trafficking for the purpose of labour exploitation, including awareness-raising campaigns and training of labour inspectors, and there has been a significant increase in the number of identified victims of trafficking for the purpose of labour exploitation.
- ▶ The Administrative Violations Code was amended in 2017, releasing from administrative liability victims of trafficking who have committed administrative violations

as a result of being trafficked. This amendment is related to one of the recommendations made in GRETA's second report, to extend the scope of the non-punishment provision to cover all offences victims of trafficking are compelled to commit, including administrative and immigration-related offences.



Malta

- ▶ The legislation was amended to increase the penalty for trafficking in human beings, introduce new aggravating circumstances for trafficking offences, exclude from public procurement procedures companies involved in trafficking, and strengthen trafficking victims' access to assistance.
- ▶ The funding for victim assistance was increased and a safe house for victims of trafficking was opened.
- ▶ In April 2018, compensation for moral damages of victims of trafficking was introduced in the Criminal and Civil Codes.



Montenegro

- ▶ As recommended by GRETA in its second report, guidelines on the application of the non-punishment principle to victims of human trafficking for police officers, prosecutors and judges were developed in 2017.
- ▶ New Standard Operating Procedures for the identification of victims of trafficking were developed, as a result of which victim identification is not connected to the initiation of criminal proceedings and is performed by a multi-disciplinary team.
- ▶ To improve investigation and prosecution of human trafficking cases, as recommended by GRETA, at the end of 2018 the Supreme State Prosecutor and the Director of the Police Directorate formed an Operational Team for Combating Trafficking in Human beings, resulting in an increase in the number of prosecutions and convictions for human trafficking.



Romania

- ▶ Amendments were made to the Criminal Code to increase the minimum penalty for trafficking in children and introduce new aggravating circumstances to this offence.
- ▶ A Monitoring Committee for the implementation of the National Anti-trafficking Strategy and a working group on victim assistance were created, and the National Identification and Referral Mechanism was updated in 2019.
- ▶ Following GRETA's second evaluation report, a mechanism for the identification of vulnerable asylum seekers, including victims of trafficking in human beings, was put in place.



United Kingdom

- ▶ Following GRETA's second evaluation report, the National Referral Mechanism (NRM) was reformed in order to improve victim identification and support, including the setting up of a Single Competent Authority and independent multi-agency panels of experts to review negative identification decisions.
- ▶ To improve victim assistance as recommended by GRETA, the support for confirmed victims of trafficking in England and Wales was increased from 45 days to a minimum of 90 days through the Modern Slavery Victim Care Contract.
- ▶ In its second report, GRETA recommended that possible child victims of trafficking are assigned a legal guardian as expeditiously as possible. The Independent Child Trafficking Guardian service has been made operational in two-thirds of local authorities in England and Wales.

Activities related to the implementation of GRETA's recommendations



Round-table meeting, Türkiye, 7 October 2021

38. On the basis of GRETA's reports, the Council of Europe assists member States to strengthen the implementation of the Convention by organising targeted cooperation activities. With a view to promoting a 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, round-table meetings are organised in state parties to the Convention some two to three years after the publication of GRETA's first evaluation report. During the reporting period, two such meetings were organised: in the **Czech Republic** (8 November 2021) and **Türkiye** (7 October 2021).

39. A webinar presenting recent case-law of the European Court of Human Rights related to trafficking in human beings was organised on 15 March 2021 for the network of lawyers and NGOs specialised in providing legal assistance to victims of human trafficking. The case *V.C.L. and A.N. v. United Kingdom* (see paragraph 63) was presented by Professor Parosha Chandran, who had represented one of the applicants before the Court. The case *Lăcătuş v. Switzerland* (see paragraph 65) was presented by Mr Kresimir Kamber, lawyer at the Registry of the European Court of Human Rights, and Ms Sibel Can-Uzun, lawyer at the *Centre Social Protestant*, Geneva. Participants also discussed how to facilitate exchanges and sharing of information within the network.

40. As part of the joint EU-Council of Europe programme Horizontal Facility II (HF) for the Western Balkans and Türkiye, four multi-annual projects are being implemented, in Bosnia and Herzegovina, North Macedonia, Serbia and Türkiye. 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 a list of activities).

41. In **Bosnia and Herzegovina**, with a view to improving the multi-sectoral response to trafficking in human beings for the purpose of labour exploitation, five training activities were organised for labour inspectors, police officers, social protection professionals, staff of state employment agencies, and representatives of NGOs and trade unions. Further, on the basis of country-specific guidelines on the protection of the private life and personal data of victims of trafficking, five training activities were organised for legal professionals, police officers, staff of local co-ordination anti-trafficking teams, social protection, education and health professionals, and representatives of NGOs and media. Moreover, reports on child trafficking and on the age assessment of presumed child victims were prepared, and used to conduct capacity building. In addition, two information campaigns on preventing child trafficking were conducted in co-operation with the NGOs International Forum of Solidarity-EMMAUS and *Novi put*.

42. In **North Macedonia**, webinars and workshops were organised for education advisors, teachers and school psychologists on preventing and detecting child trafficking. One workshop took place with policy makers on child-driven reintegration and resocialisation. Training was also organised for media representatives on ethical journalism and reporting on human trafficking cases. Gender-sensitive assistance to victims of trafficking was the theme of two events organised for social workers, members of anti-trafficking mobile teams and Roma leaders. Moreover, two information campaigns on preventing child trafficking were conducted in co-operation with the NGO Luludi and the Macedonian Association of Young Lawyers. The online HELP course on combating trafficking in human beings was followed by 29 judges, prosecutors, court advisors, police officers, lawyers and labour inspectors.

43. In **Serbia**, a webinar on the protection and rights of victims of trafficking was organised for legal professionals. Further, training sessions on trafficking for the purpose of labour exploitation were provided to labour inspectors, police officers, the Centre for the Protection of Trafficking Victims and NGOs. Following a revision of the indicators for preliminary identification of child trafficking, a training was

organised for education professionals. A round table on child sensitive communication and evidence-based protocols for interviewing child victims of trafficking took place for professionals from social care centres, foster homes and NGOs. Two information campaigns were carried out in co-operation with the NGOs Atina and World of Words to raise awareness about the risks of child trafficking. The online HELP course on combating trafficking in human beings was completed by 43 judges, prosecutors and law students.

44. In **Türkiye**, a round-table on inter-institutional co-ordination in the investigation and prosecution of trafficking cases brought together 55 representatives of the Ministry of Justice, the Presidency of Migration Management, the Coast Guard General Command, the Gendarmerie General Command and the Directorate General of Security. Another round table was organised to discuss the role of NGOs in combating trafficking in human beings. The conference on “Criminal Justice Response to Human Trafficking”, organised on 29-30 July 2021 in Ankara, brought together representatives of 25 public institutions. Moreover, awareness-raising campaigns on child trafficking were conducted in five municipalities. The online HELP course on combating trafficking in human beings was completed by 131 judges, prosecutors, lawyers and representatives of the Gendarmerie General Command.



Council of Europe Secretary General Marija Pejčinović Burić addresses the conference on “Ending trafficking in children and young persons”, 4-5 May 2021

Conferences focusing on child trafficking

45. GRETA’s monitoring shows that child trafficking has continued to increase, despite legislative and practical measures taken by member Parties. In the context of mixed migration flows, the number of unaccompanied or separated children has grown, and there are continuing challenges in ensuring their protection from trafficking and exploitation. The COVID-19 pandemic has made children even more vulnerable to trafficking, and there are reports of increased grooming and exploitation of children online.

46. The conference “Ending trafficking in children and young persons: Together, towards a future without child trafficking in Europe” was organised on 4-5 May

2021 by the Project THB LIBERI¹⁰ and GRETA, under the German Presidency of the Committee of Ministers of the Council of Europe, to discuss challenges and innovative approaches which can have a positive impact on combating child trafficking. Due to the coronavirus pandemic related restrictions, the conference was held online, with some 300 participants registered to follow the proceedings. The aim of the conference was to discuss challenges and innovative approaches which can have a positive impact on combating child trafficking. Opening statements were made by Ambassador Rolf Mafael, Permanent Representative of Germany to the Council of Europe, Mr Hans-Georg Engelke, State Secretary of the German Federal Ministry of the Interior, Ms Marija Pejčinović Burić, Secretary General of the Council of Europe, Mr Olivier Onidi, acting EU Anti-Trafficking Coordinator, and Professor Siobhan Mullally, UN Special Rapporteur on Trafficking in Persons, especially women and children. The conference enabled the sharing of practice-oriented, multi-disciplinary knowledge which can improve the detection of children and young persons exploited through the Internet, strengthen children's testimonies, and combat the exploitation of children and young persons by family structures.¹¹ The effects of the Covid-19 pandemic on human trafficking, in particular on increasing vulnerabilities and exploitation online, were underscored by participants.

47. Further, on 22-23 June 2021, the regional conference "Acting together in the face of crisis: Protecting children from trafficking and exploitation in the Western Balkans" was organised in the framework of the joint European Union - Council of Europe programme Horizontal Facility II for the Western Balkans and Türkiye (2019-2022). It took stock of trends and new challenges in child trafficking, identified positive initiatives, and discussed areas where improvements can be induced.¹² The online event gathered over 130 participants from the region and beyond, who underscored the importance of placing the rights and best interests of the child at the heart of policies and practical measures to prevent and combat human trafficking.

New HELP online module on combating human trafficking for the purpose of labour exploitation

48. A new module on human trafficking for the purpose of labour exploitation was developed and launched in 2021 by the Council of Europe Programme for Human Rights Education for Legal Professionals (HELP). It focuses on the standards of the Council of Europe Anti-Trafficking Convention and the case-law of the European Court of Human Rights, and covers in an interactive way the key concepts and actors, the identification of victims, victims' rights and assistance, investigation, prosecution and trial, corporate liability, and access to remedies and compensation. The course is freely available in self-learning format on the HELP e-learning platform.¹³ It will be translated into several languages and launched in tutored format in collaboration with interested HELP national partners (National Training Institutions and Bar Associations

10 The THB LIBERI project, running from 2018-2021, is funded by the Internal Security Fund (ISF) of the European Union. It is led by the German Federal Criminal Police Office (BKA-SO41) and involves seven German federal states police departments, as well as the Austrian Federal Criminal Police Office.

11 [Conference: "Ending trafficking in children and young persons - Together, towards a future without child trafficking in Europe" \(coe.int\)](#)

12 [REGIONAL CONFERENCE \(onlinebase.net\)](#)

13 [CoE HELP e-learning platform.](#)



Meeting of National Anti-Trafficking Coordinators, 15-16 November 2021

Meeting of National Anti-Trafficking Co-ordinators and Rapporteurs

49. On 15 and 16 November 2021, the Council of Europe and the OSCE organised jointly, for the fourth consecutive year, a meeting of National Anti-Trafficking Co-ordinators and Rapporteurs. The meeting was held at the premises of the Council of Europe in Strasbourg and online, and was attended by representatives of 60 countries (all Council of Europe member States and OSCE participating States, as well as three OSCE Partners for Co-operation). GRETA was represented by its President and First Vice-President.

50. The meeting provided an opportunity to discuss how to address current trafficking-related challenges and foster the implementation of international commitments, policies and standards set forth by the OSCE and the Council of Europe Convention on Action against Trafficking in Human Beings. During the first session, the panellists presented new developments and promising practices in combating trafficking in human beings for the purpose of labour exploitation, which has been the subject of increased attention in many countries, with the adoption of new legislation on due diligence and transparency in companies' supply chains (German Act on Corporate Due Diligence in Supply Chains, Norwegian Transparency Act).

51. The second session focused on enhancing mechanisms to maximise national anti-trafficking responses. Representatives of Austria and Portugal shared experiences in developing and implementing National Action Plans to combat human trafficking. The importance of a multi-agency approach was stressed, bringing together all relevant ministries, agencies, regional/local authorities, social partners

and specialised NGOs in the preparation of the action plans. The plans should include goals, a time frame for implementation, responsible entities, and indicators. Findings from a recent study conducted by the OSCE show that many countries lack dedicated funding to support the implementation of action plans and current challenges, such as technology-facilitated trafficking, discouraging demand for services provided by trafficking victims, and combating trafficking for labour exploitation are not addressed. These findings are substantiated by GRETA's monitoring of the implementation of the Council of Europe Anti-trafficking Convention.

52. Session three examined the role of National Rapporteurs or equivalent mechanisms in monitoring and strengthening States' anti-trafficking action, with presentations from the UK Independent Anti-Slavery Commissioner and the Dutch National Rapporteur on Trafficking in Human Beings and Sexual Violence against Children. Türkiye reported that in 2021, the Human Rights and Equality Institution of Türkiye had been designated as National Rapporteur to monitor and evaluate national efforts against human trafficking.

53. During the final session, participants discussed the importance of providing support and assistance to victims of trafficking independent of the criminal justice process, which is a requirement of the Council of Europe Anti-trafficking Convention. National examples from Greece, Ukraine, Serbia and Poland highlighted the benefits of the "social path" for the identification of victims of trafficking, the protection of victims' rights, the prevention of secondary victimisation, and the chances of success of the criminal justice process.

54. During the meeting, the EU Anti-Trafficking Coordinator, Ms Diane Schmitt, provided an update on the work carried out following the adoption of the new EU Strategy on combating human trafficking (2021-2025), including the launch of an evaluation of the implementation of the EU Anti-Trafficking Directive and the publication of guidance on due diligence to help EU companies to address the risk of forced labour in their operations and supply chains. Furthermore, OSCE/ODIHR provided information on the progress of preparation of the updated National Referral Mechanism (NRM) Handbook,¹⁴ which addresses recent dynamics, trends and risk gaps.

55. Speakers stressed the importance of these annual meetings which provide a platform for exchange and an opportunity to share experiences, identify joint actions in addressing current human trafficking-related challenges, and foster the implementation of relevant Council of Europe standards and OSCE commitments.

14 [ODIHR National Referral Mechanisms Handbook, 2nd Edition | OSCE.](#)



29th meeting of the Committee of the Parties, Strasbourg, 17 December 2021

Relations with the Committee of the Parties

56. 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. GRETA recalls that the purpose of this provision of the Convention is to strengthen the implementation of GRETA's conclusions.

57. 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.

58. At its 28th meeting (4 June 2021), the Committee of the Parties considered five GRETA reports and adopted recommendations addressed to the Governments of Bulgaria, Denmark, Georgia, Montenegro and Romania (third evaluation round). Further, at its 29th meeting (17 December 2021), the Committee of the Parties adopted recommendations concerning Malta and the United Kingdom, based on GRETA's third round evaluation reports.

59. The Committee of the Parties also examined reports submitted by Parties on the implementation of the Committee's recommendations. Thus, at its 28th meeting, the Committee considered reports submitted by the authorities of Andorra,

Germany, Hungary, Italy, Lithuania and Switzerland, concerning measures taken to comply with the Committee of the Parties' second round recommendations on the implementation of the Convention. At its 29th meeting, the Committee considered reports from the governments of Türkiye (first round evaluation) and Liechtenstein (combined first and second round evaluation), concerning the implementation of the previous recommendations issued to these Parties. The Committee of the Parties decided to transmit these reports to GRETA for examination. Subsequently, letters were sent to the Parties concerned, asking them to provide further information on certain issues. This information will be followed up during the subsequent evaluation round of the Convention.



Co-operation with Council of Europe bodies

European Court of Human Rights

60. GRETA's monitoring of the implementation of the Convention contributes to preventing violations of the European Convention on Human Rights, Article 4 of which includes within its scope trafficking in human beings, as confirmed by the European Court of Human Rights.

61. On 3 September 2021, GRETA made a written submission to the European Court of Human Rights, pursuant to Rule 44 § 4 of the Rules of Court, in the case of *W. v. Bulgaria* (application No. 18269/18), on the basis of two questions which the Court had put to GRETA: "(a) whether the laws of the member States of the Council of Europe enable the victims of human trafficking to obtain from their traffickers compensation for loss of earnings, and, more specifically, (b) whether those laws enable former prostitutes to obtain from their former pimps compensation for prostitution earnings which the pimps have withheld from them". This was the third written submission made by GRETA to the Court.¹⁵

62. A growing corpus of the Court's judgments related to different articles of the European Convention on Human Rights refer to GRETA's reports.

¹⁵ The previous two submissions by GRETA were made on 6 February 2019, in the case of *A.N. v. the United Kingdom* (application No. 74603/12), and on 27 March 2019, in the case of *S.M. v. Croatia* (application No. 60561/14).

63. The case *V.C.L. and A.N. v. United Kingdom*¹⁶ (applications Nos. 77587/12 and 74603/12, judgment of 16 February 2021, final on 5 July 2021) concerned two Vietnamese nationals who were minors at the time they were arrested working at cannabis farms in the UK. Both were charged with drug offences and received prison sentences after they pleaded guilty on the advice of their initial lawyers, despite strong evidence and concerns raised by the UK Border Agency, social services and an NGO that they were or may have been victims of trafficking. In this case, the Court examined for the first time the compatibility of the prosecution of victims of trafficking with Articles 4 and 6 of the European Convention on Human Rights. Although it ruled that such prosecution would not *per se* violate Article 4 of the Convention, the Court found that the UK authorities had failed to present clear reasons consistent with the definition of trafficking, contained in the European Anti-Trafficking Convention, to continue the criminal proceedings against the applicants. The Court found that the authorities' failure to conduct a timely assessment of whether the applicants had in fact been trafficked amounted to a breach of their positive obligations under Article 4 of the Convention. In the context of Article 6 of the Convention, the Court considered that the lack of such an assessment prevented them from securing evidence which may have constituted a fundamental aspect of their defence. As the appeals stage did not cure the initial shortcomings, the applicants did not receive a fair trial, in violation of Article 6, paragraph 1, of the Convention. The Court awarded the applicants 25,000 euros each in respect of non-pecuniary damage, and 20,000 euros each in respect of costs and expenses. GRETA had previously made a third-party submission to the Court in the case of *A.N. v. UK*.

64. The case *Zoletic and Others v. Azerbaijan*¹⁷ (application No. 20116/12, judgment of 7 October 2021) concerns 33 Bosnia and Herzegovina nationals who were recruited in 2009 to work in Azerbaijan as temporary foreign construction workers by representatives of the company Serbaz Design and Construction LLC. The Court found that the totality of the applicants' arguments and submissions made both before the domestic courts in their civil claim and before the Court (concerning excessively long work shifts, lack of proper nutrition and medical care, physical and other forms of punishments, retention of documents and restriction of movement) constituted an "arguable claim" that the applicants had been subjected to human trafficking and forced labour. The Court stated that even though the applicants' claims concerning the alleged forced labour and human trafficking had been sufficiently and repeatedly drawn to the attention of the relevant domestic authorities in various ways, no effective investigation had taken place and, therefore, Azerbaijan had failed to comply with its procedural obligation under Article 4, paragraph 2, of the Convention. Each applicant was awarded compensation for non-pecuniary damage in the amount of 5,000 euros. In its decision, the Court referred to the findings of GRETA's 2014 report on Azerbaijan, in particular to the fact that law-enforcement officials in Azerbaijan had a tendency to see potential cases of human trafficking for labour exploitation as mere labour disputes between the worker and the employer, and that there seemed to be a confusion between cases of human trafficking for labour exploitation and disputes concerning salaries and other aspects of working conditions.

16 [V.C.L. AND A.N. v. THE UNITED KINGDOM \(coe.int\)](#)

17 [ZOLETIC AND OTHERS v. AZERBAIJAN \(coe.int\)](#)

65. Reference should also be made to the case *Lačatuš v. Switzerland*¹⁸ which concerned an order for the applicant to pay a fine of 500 Swiss francs (approximately 464 euros) for begging in public in Geneva, and her detention in a remand prison for five days for failure to pay the fine. In this case, the Court considered that the penalty imposed on the applicant had not been proportionate either to the aim of combating organised crime or to the aim of protecting the rights of passers-by, residents and shopkeepers. The Court found that there had been interference with the exercise by the applicant of her rights under Article 8 of the Convention. The interference had had a legal basis in section 11A of the Geneva Criminal Law Act, according to which begging is punishable by a fine. The Court expressed doubts concerning the authorities' claim that criminalisation of begging is an effective measure against human trafficking, which may involve the exploitation of begging by criminal networks. In this regard, the Court referred to GRETA's report on Switzerland, which urged the Swiss authorities to adopt a provision which provides for the possibility of not punishing victims of trafficking for their involvement in unlawful activities they were compelled to commit.

Other Council of Europe bodies

66. As noted in paragraph 10, at its 41st meeting (5-8 July 2021), GRETA held an exchange of views with Ms Simona Lanzoni, 1st Vice-President of GREVIO, and Ms Johanna Nelles, Executive Secretary of GREVIO. Ms Lanzoni presented a number of developments and issues emerging in the context of GREVIO's on-going monitoring work. She drew attention to two issues on which the Istanbul Convention and the Anti-Trafficking Conventions intersect, namely forced marriages and prostitution. GREVIO's evaluation procedures focus on forced marriage as one of the forms of violence against women which the Istanbul Convention criminalises. GREVIO's baseline evaluation reports have revealed that in relation to some States Parties, the offence of forced marriage forms part of the offence of trafficking in human beings. In assessing such approaches, GREVIO benefits from the in-depth evaluation by GRETA, and where relevant, refers to GRETA's evaluation reports. Further, Ms Lanzoni referred to the Istanbul Convention's set of standards as applied to women in prostitution in states parties' implementation efforts. She informed GRETA that in its evaluation procedures GREVIO seeks to systematically address the situation of women in prostitution. Their specific challenges in accessing general and special support services, including access to shelters, are frequently covered in GREVIO baseline evaluation reports. GRETA and GREVIO exchanged on common challenges and their working methods, and agreed to consolidate their collaboration through information sharing on issues of common interest and co-ordination of their monitoring activities.

67. GRETA and its Secretariat have also maintained contacts with the Special Representative of the Secretary General for Migration and Refugees, Ambassador Drahošlav Štefánek, in the context of his activities and in particular the preparation of his country visits and reports. An exchange of views took place at GRETA's 41st meeting, during which the Special Representative informed GRETA of the main findings of the urgent fact-finding mission he had carried out in Bosnia and Herzegovina in

18 [LACATUS c. SUISSE \(coe.int\)](#)

January 2021 and his visit to Türkiye in March 2021, as well as the main components of his mandate as renewed in July 2020. Further, he referred to the new Council of Europe Action Plan on Protecting Vulnerable Persons in the Context of Migration and Asylum in Europe (2021-2025), adopted on 5 May 2021 by the Committee of Ministers, and the ongoing activities aimed at its implementation. The ensuing exchange of views focused on interconnection between combating migrant smuggling and trafficking in human beings, the human rights violations related to pushbacks, and co-operation with EU agencies.

68. Furthermore, on 25 October 2021, Ms Julia Planitzer, GRETA Second Vice-President, attended the 9th annual meeting of heads of monitoring and advisory bodies organised by the Secretary General of the Council of Europe in Strasbourg.

69. Contacts were also maintained with the Office of the Council of Europe Commissioner for Human Rights and the Parliamentary Assembly on matters of common interest.



Co-operation with other intergovernmental organisations

70. 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 (Council of Baltic Sea States, ICMPD, ILO, IOM, OSCE, UNHCR, UNICEF). 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 8).

United Nations

71. In February 2021, GRETA made a submission to the UN Special Rapporteur on trafficking in persons, especially women and children, following a call for input for her report on the implementation of the non-punishment principle, which was published on 17 May 2021.¹⁹ The report contains recommendations aimed at supporting States in the adoption of a model of application of the non-punishment principle that is fully compliant with States' obligation to protect victims of trafficking.

72. GRETA was represented at a number of online events organised by UN institutions during the reporting period. For example, the Executive Secretary of the Convention made presentations at three online regional expert group meetings organised by UNODC for South-Eastern Europe (on effective remedies for victims of trafficking, on trafficking for labour exploitation, and on addressing demand leading to trafficking for sexual exploitation) and the Expert Group Meeting on Draft Toolkit on the Investigation and Prosecution of Trafficking in Persons for Organ Removal, co-organised by UNODC, IOM and Glo-ACT on 4 March 2021.

19 [A/HRC/47/34 - E - A/HRC/47/34-Desktop \(undocs.org\)](#)

73. As noted in paragraph 10, during its 41st meeting, GRETA had the possibility to exchange with two representatives of UNODC, Mr Martin Fowke and Mr Antonio De Vivo, on the new mechanism for the review of the implementation of the UN Convention against Transnational Organized Crime (UNTOC) and its three protocols, including the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children. Although this is a state-led process, states are encouraged to involve civil society organisations, including in the completions of the initial self-assessment questionnaire. The review process is expected to last 10 years and there is already a programme in place for the implementation of the recommendations stemming from the review mechanism.

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

74. The Council of Europe is a partner of the Inter-Agency Co-ordination Group against Trafficking in Persons (ICAT). GRETA's Secretariat continues to be involved in ICAT Working Group meetings, which in 2021 were co-chaired by the OSCE and UN Women, and has contributed to the preparation of issue briefs, ensuring that the Convention's standards and GRETA's work are duly reflected. The Executive Secretary also participated in the ICAT Principal Level Meeting on 15 November 2021, held online.

OSCE/ODIHR

75. 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 awareness raising and advocacy, capacity building and assistance to governmental and non-governmental actors, and conducting assessments and monitoring²⁰ and providing recommendations.

76. The OSCE has observer status with the Committee of the Parties to the Council of Europe Anti-Trafficking Convention. Further, it has a participant status in DH-TET (see paragraph 6) and sent a representative who contributed to its meetings.

77. As noted above, the Council of Europe and the OSCE organised jointly a meeting of National Anti-Trafficking Co-ordinators and Rapporteurs, held online on 15 and 16 November 2021 (see paragraphs 16 and following).

78. Members of GRETA and representatives of the Council of Europe Secretariat regularly participate in conferences and other events organised by the OSCE. Such exchange contributes to sharing mutual expertise, informing research and policy development and enhances alignment and synergy. By way of example, the

20 The Office of the OSCE Special Representative and Co-ordinator for Combating of Trafficking in Human Beings, in order to implement its mandate which requires the Office to "be ready to offer advice to senior level authorities", conducts data collection, research and analysis of the current trends of trafficking in human beings, country visits, assessment of the efficiency of anti-trafficking measures, and promotion of best practices in combating trafficking.

President of GRETA was a panellist at the OSCE 21st Conference of the Alliance against Trafficking in Persons “Confronting demand: Tackling a root cause of trafficking in human beings”, held on 14-16 June 2021 in Vienna and via teleconference. Further, a representative of the Office of the OSCE Special Representative and Co-ordinator for Combating of Trafficking in Human Beings contributed to the Council of Europe online conference “Taking action in the face of crisis: working together in the Western Balkans to protect children from trafficking and exploitation” on 22-23 June 2021.

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

80. Besides a bilateral format, co-operation with the Office of the OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings continues to develop in the framework of the OSCE Alliance Expert Coordination Team (AECT), as well as ICAT. The Executive Secretary of the Convention participated in the AECT meeting on 16 December 2021.

European Union

81. In April 2021, the European Commission published a new Strategy on Combating Trafficking in Human Beings (2021-2025). GRETA had made a submission during the targeted consultation on the new Strategy in 2020. GRETA welcomes the Strategy’s attention to prevention of human trafficking for different forms of exploitation, victim identification and assistance, reducing demand that fosters trafficking, and building a robust criminal justice response. GRETA also notes positively the fact that the Strategy envisages that the Commission will work closely with the Council of Europe and GRETA, in line with the identified priorities of this strategy, and is committed to continuing its partnership with the European Union agencies.

82. The EU Anti-Trafficking Co-ordinator participated in events organised by the Council of Europe in 2021, such as the conference on child trafficking in May 2021 and the joint Council of Europe-OSCE meeting of national coordinators and rapporteurs in November 2021.

Council of Baltic Sea States

83. The Executive Secretary made presentations at the conference “Trafficking in the Digital Era”, on 6 May 2021, and the conference “Competence building, assistance provision and prevention of trafficking in human beings for labour exploitation”, on 9 June 2021.



Co-operation with civil society

84. 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.

85. During the reporting period, 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.

86. Members of GRETA and the Secretariat participated in a number of events organised by civil society organisations (see Appendix 8). By way of example, GRETA's President and Second Vice-President spoke at the symposium "Defining the Gap – Trafficking in Human Beings and Data Policy", organised by the German NGO Network against Trafficking in Human Beings (KOK) in Berlin on 14-15 October 2021. The Executive Secretary spoke at the public debate "Shrinking space and role of civil society in addressing trafficking in human beings", organised by La Strada International on the occasion of its 25th anniversary, in Amsterdam on 15 September 2021.

87. The final report of the project “REST – Residency Status: Strengthening the protection of trafficked persons”, implemented by NGOs in six European countries, and co-funded by the Council of Europe, was published in January 2021.²¹ The report reviewed the international and European legal framework on access to residence permits and international protection for trafficked persons and its implementation at the national level in six countries (Austria, France, Republic of Moldova, the Netherlands, Serbia and Spain). The research provides best practice examples and recommendations on how States can ensure that trafficked persons are provided with the most appropriate protection to secure rights and access to durable solutions. GRETA members and Secretariat participated in events discussing the findings and recommendations of this project. A side event was also organised during the 28th meeting of the Committee of the Parties on 4 June 2021, during which the need for more access to residence for victims of trafficking was discussed.

88. Further, GRETA's Secretariat contributed to the two-year project TRIPS – Identification of Trafficked International Protection Beneficiaries' Special Needs, which was implemented by Forum réfugiés-Cosi (co-ordinator) and partner organisations in France, Ireland, Italy and the Czech Republic. The final report on this project and a toolkit for practitioners were released in December 2021.²²

89. Following a call for proposals launched in July 2020, the Council of Europe's Anti-Trafficking Division awarded grants to four civil society organisations - Atina (Serbia), PULSE Foundation (Bulgaria), SOLWODI (Germany) and Association RUELLE (France) - to support initiatives to prevent trafficking in human beings and assist and protect victims of trafficking in the context of the COVID-19 pandemic,²³ covering activities carried out over an eight-month implementation period running from October 2020 to June 2021.

90. Atina's project concentrated on improving victims' access to essential services in Serbia during the pandemic such as online counselling, provision of basic necessities such as food, hygiene and baby-care products, and enhancing the capacities of front-line workers (law enforcement, social workers, service providers, medical professionals) in providing quality support and assistance to survivors of human trafficking. A series of articles²⁴ on the various activities supported by the grant were published on Atina's website.

91. PULSE Foundation²⁵ carried out activities to optimise a support programme for victims of trafficking in Bulgaria, including a 24-hour support line and provision

21 REST – Residency Status: Strengthening the protection of trafficked persons, Policy Paper (January 2021), p. 12.

22 TRIPS project publishes a toolbox and report on the integration of trafficked refugees | European Website on Integration (europa.eu)

23 See paragraph 76 of the 11th General Report on the activities of GRETA

24 Promising practices: One of the highest human trafficking verdicts in Serbia was issued during the COVID-19 pandemic | atina; Online counseling with human trafficking victims during the COVID-19 pandemic | atina; Promising practices: Letters of migrant and refugee women from isolation | atina; Promising practices: Atina's response to the crisis caused by the COVID-19 pandemic | atina; Girls and women with the experience of trafficking contributed to shedding light on the issue of violence in digital surroundings | atina

25 The Council of Europe supports the PULSE Foundation's programs and services for the prevention of trafficking in human beings and support for victims or at risk of trafficking (pulsfoundation.org)

of humanitarian packages of food, clothing and medicine, to raise public awareness on risks, prevention and support opportunities, and to improve co-operation between NGOs and institutions. A brochure and a video clip about the risks and consequences of trafficking and ways to seek help and support were produced, as well as a handbook for professionals working on cases of trafficking.

92. SOLWODI²⁶ carried out data collection on gender-specific impacts of the pandemic on victims of trafficking, the results of which were presented in a report to raise public awareness to further promote and protect the rights of victims of trafficking.²⁷ Activities were also carried out to prevent further victimisation by promoting and protecting the rights of victims of trafficking by ensuring that specific emergency-related vulnerabilities to THB and the needs of women are addressed. To this end, SOLWODI provided psycho-social counselling and support to the women concerned.

93. The objective of Association RUELE's project was to improve the detection of victims of trafficking, in particular in the agricultural sector, and assist victims to come out of exploitation, by providing shelter and legal assistance. Three awareness-raising sessions were organised for labour inspectors, health-care workers and trade unions representatives. RUELE provided psychological and legal assistance, as well as accommodation solutions to 15 victims of trafficking for the purpose of labour exploitation.

26 [Solwodi - Council of Europe COVID-19 Project](#)

27 [Impact of the COVID-19 pandemic_EN](#)



Online and technology-facilitated trafficking in human beings

94. Trafficking in human beings (THB) is a dynamic crime with an ever-growing use of information and communication technologies (ICT). Back in 2007, the Council of Europe commissioned [a study on the misuse of the Internet for the recruitment of victims](#). Since then, the rapidly increasing availability of technology and generalised access to the Internet have significantly changed the criminal landscape. At the same time, digital technologies and Artificial Intelligence create new opportunities, serving as a tool to prevent and investigate crimes, and to identify and assist victims.

95. Countries monitored by GRETA have reported an increased use of the ICT for recruiting and controlling victims of trafficking. At the same time, the evidence base on online and technology-facilitated human trafficking remains limited and patchy. This is why GRETA decided to conduct a study to assess the extent to which technology impacts trafficking and explore the operational and legal challenges that states face in detecting, investigating and prosecuting online and ICT-facilitated trafficking. Following a call for tender, Dr Paolo Campana, Associate Professor at the University of Cambridge, United Kingdom, was selected to conduct the study on behalf of GRETA. The study was carried out in 2021, based on questionnaires sent to State Parties to the Convention, NGOs and tech companies. It assessed the extent to which technology impacts human trafficking, the operational and legal challenges in detecting, investigating and prosecuting online and ICT-facilitated human trafficking offences, and the strategies to overcome such challenges.

96. In order to maximise the visibility of the study's findings and recommendations, GRETA has decided to reproduce in this General report a summary of the report and its recommendations.

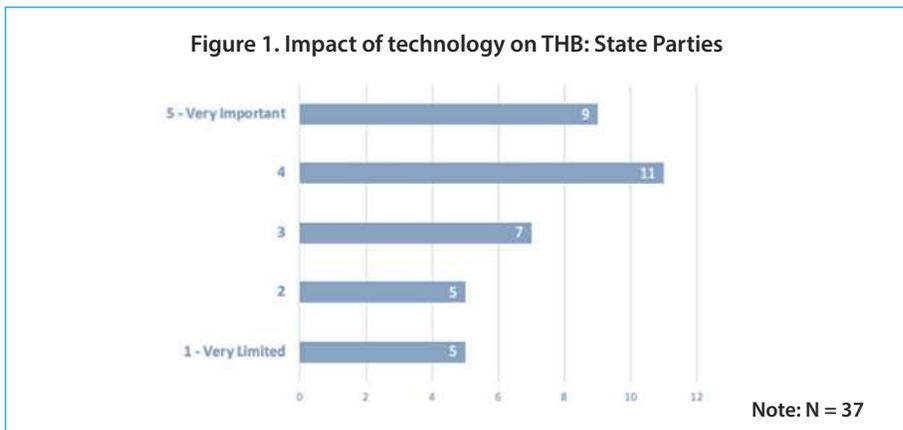
Methodology of the study

97. The study follows Latonero²⁸ in defining technology as “information and communication technologies, particularly those constituting digital and networked environments. Technologies that allow users to exchange digital information over networks include the Internet, online social networks, and mobile phones”.

98. The evidence from the study was collected through a questionnaire that included both open-ended and closed-ended questions. The questionnaire was produced in three versions: a longer version for State Parties (40 questions) and two shorter versions for NGOs (14 questions) and tech companies (11 questions). The design of the questionnaire was informed by a landscape analysis carried out in October – December 2020 covering a variety of sources: international organisations, academia, NGOs as well as the private sector. Responses were received from 40 State Parties²⁹, 12 NGOs³⁰ and 2 tech companies³¹ in June – July 2021 (one late response reached the Council of Europe Secretariat in September 2021). Analyses were then carried out in June – September 2021.

The impact of technology on trafficking in human beings

99. The impact of technology on trafficking of human beings is of particular concern during two stages of the trafficking process: recruitment and exploitation. Evidence submitted by State Parties points to an “increasing” relevance of technology in the context of THB, with the majority of State Parties considering the impact of technology on THB to be either “very important” or “important”.



28 Latonero M. (2012). *The Rise of Mobile and the Diffusion of Technology-Facilitated Trafficking*. University of Southern California, Annenberg Center on Communication Leadership & Policy, pp. 9-10.

29 Albania; Armenia; Austria; Azerbaijan; Bosnia and Herzegovina; Belarus; Belgium; Bulgaria; Croatia; Cyprus; Denmark; Estonia; Finland; France; Germany; Greece; Hungary; Iceland; Ireland; Latvia; Lithuania; Luxembourg; Malta; Republic of Moldova; Monaco; Montenegro; Netherlands; North Macedonia; Norway; Poland; Portugal; Romania; San Marino; Slovakia; Slovenia; Spain; Sweden; Switzerland; Ukraine and United Kingdom.

30 Astra (Serbia); Different and Equal (Albania); FIZ (Switzerland); Hope Now (Denmark); Jesuit Refugee Service (North Macedonia); KOK (Germany); La Strada (Republic of Moldova); La Strada International (Europe-wide); Migrant Rights Centre (Ireland); Praksis (Greece); Schweizer Plattform gegen Menschenhandel (Switzerland); Sustainable Rescue Foundation (The Netherlands).

31 Facebook and IBM.

100. State Parties have noted the increasing relevance of online materials, advertisements, and sites/applications (or 'apps') in the search for jobs as well as the increasing relevance of online socialisation and personal interactions. In turn, both create opportunities for THB offenders and exacerbate existing vulnerabilities. Technology has changed the way people interact and this is reflected in the criminal landscape, including THB. This is a structural change that law enforcement and criminal justice systems need to adapt to.

101. Technology can play a role in the recruitment stage by facilitating the identification, location and contact of potential victims. Different mechanisms are at play depending on the type of exploitation.

102. In the context of recruitment for sexual exploitation, several State Parties have identified cases of job advertisements linked to THB and uncovered evidence of recruitment via social media platforms as well as dating applications. A common strategy is the so-called "lover boy" technique: a type of online recruitment in which a trafficker identifies and contacts a potential victim via an online platform, gets to know their hobbies and interests as well as their personal and family situations. The trafficker then offers empathy and support to the potential victim in the context of a romantic relationship – seeking to gain trust and subsequently establish control over the victim.

103. There is evidence from several countries of cases of victims' blackmailing. This is often done by first collecting "compromising" information about the victims—for instance, by asking for naked pictures or videos—and then using the information to coerce them into prostitution.

104. During the exploitation stage, technology can facilitate the sale of sexual services provided by victims. There is ample evidence from several countries of Internet websites used to advertise sexual services. Among such advertisements, there are services provided by THB victims. Moreover, while live-streaming is often connected to child sexual abuse, a handful of countries have suggested that such live streaming might also involve adult victims of THB.

105. Further, technology can be used to coordinate activities. Crucially, technology allows for a separation between the place where the sexual activity is performed and the place where coordination takes place. This has important implications for law enforcement.

106. Countries have provided evidence of technological tools used by traffickers to monitor and control victims during the exploitation stage. Blackmail and the use of compromising information against victims can also be used to exert control during this stage.

107. Emerging trends in the context of sexual exploitation noted by various countries include the expansion of "live web cams" and "pay-as-you-go" video chat applications and increasing use of apps to control victims. Such web cams and video chat applications can be used to live stream sexual acts performed by victims. A few countries have noted that the Covid-19 pandemic has increased the opportunities for traffickers to establish online contacts with vulnerable individuals.

108. In the context of trafficking for labour exploitation, evidence provided by State Parties indicates that ICTs are mainly employed to recruit victims, particularly through online job advertisements. Such advertisements are not only published on classified job websites, but also posted and circulated on social media in specialised job searching groups and mutual aid groups. Several countries have highlighted the relevance of webpages meant to foster information exchange among migrant workers as a recruiting space targeted by traffickers.

109. An emerging trend in the context of labour exploitation, reported by some countries, includes a rise in cases of recruitment through the Internet and social networks. This is believed to have been accelerated by the outbreak of Covid-19. While technology does not seem to play a noticeable role in the exploitation stage, countries have flagged up the increase of opportunities to exploit THB victims offered by the 'gig-economy', particularly delivery platforms.

110. There is no evidence of any relevant role played by the Dark Web in the context of adult THB (the circulation of child sexual exploitation materials is outside the scope of this study). Similarly, cryptocurrencies appear not to be widely used in the context of THB (on the contrary, they are used to purchase live streaming of child sexual abuses).

111. Evidence submitted by NGOs paints a similar picture. They have identified the use of Internet and social media in all stages of human trafficking, and particularly in relation to (a) recruitment; (b) exploitation; and (c) exertion of control and pressure over victims. In addition, traffickers can use ICTs, including social media and encrypted apps, to continue contact with THB victims after they have left the exploitative situation, often to prevent them from filing complaints and seeking justice.

112. Emerging trends based on evidence from NGOs suggest an increase in the exploitation of children via webcam and social media. There have been suggestions that offenders have started to use online games to approach potential victims.

113. Finally, the available evidence base suggests that the use of technology complements rather than substitutes personal, offline interactions. Technology and in-person interactions are best seen as integrated.

Challenges in detecting, investigating and prosecuting technology-facilitated THB

Challenges to detection

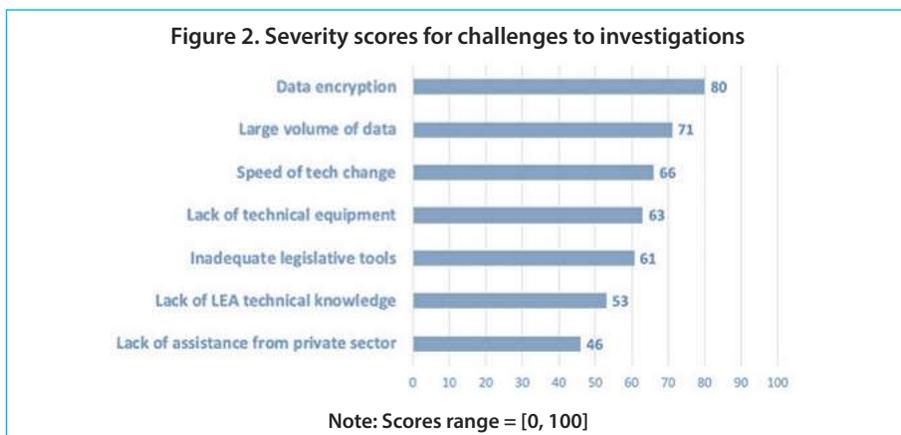
114. Detecting instances of online and technology-facilitated human trafficking and identifying victims remains very challenging. State Parties have highlighted a number of challenges:

- ▶ The constantly-growing volume of online activities/interactions. Policing the Internet is very resource intensive and subject to legal restrictions (including privacy laws and limitations to the use of web crawlers in some countries);
- ▶ The volume of online advertisements (open and classified) for both sexual and non-sexual services is often too vast to be manually searched;

- ▶ Difficulties in identifying both perpetrators and victims as they may use nicknames and aliases when operating online and may use anonymising software (e.g., VPNs);
- ▶ Use of encrypted communication between traffickers and victims. Conversations between traffickers and victims take place in closed groups;
- ▶ Fast-changing behaviour of Internet users;
- ▶ Challenges in sorting online advertisements to identify those related to THB both in the context of sexual and non-sexual services. Red flags in relation to advertisements related to both sexual and labour exploitation are still underdeveloped or not consistently utilised;
- ▶ Absence of specialised units within the police and/or lack of specialised THB investigators with advanced computer skills. Lack of officers trained to carry out covert operations on the Internet. Cyber-operations can be lengthy and time-consuming;
- ▶ Time-consuming process of sending requests to social media companies and lack of response from some of them;
- ▶ Short data retention periods for IP addresses and difficulties in accessing them.

Challenges to investigations

115. **Data encryption** is seen as the most severe challenge faced by State Parties (severity score of 80 out of 100). This is followed by the large volume of data (71), speed of technological change (66), lack of technical equipment (63), inadequate legislative tools (61), lack of technical knowledge among law enforcement (53) and lack of assistance from the private sector (46).



116. Data encryption protocols included in popular apps and online services are widely seen as problematic. Encryption also restricts the possibility to monitor communications. A few countries have hinted at the existence of tools to decrypt some types of devices. However, this is a constantly evolving landscape that requires (large) investments in both training and software. Steps taken to overcome this issue include the establishment of cybercrime units/centres tasked with working on decryption

technology. Further, there is value in pooling resources at the supranational level in the development of technological products, such as decryption software and web-crawlers.

117. Electronic communications and ICT devices generate a **large and constantly growing volume of data** which, in turn, poses substantial strain on investigators. This strain impacts investigators' ability to extract and carefully scrutinise the data, which itself requires specialised pieces of software as well as specific training on how to systematise and search within such large bodies of evidence.

118. There is a broad consensus that building capacity in handling large amount of **electronic evidence** is crucial. However, such capacity needs to be constantly updated. Countries have noted that challenges are posed not just by the growing amount of data generated by online platforms and social media, but also by the changing **behavioural patterns of their users**.

119. **Lack of technical equipment** has been flagged as a challenge by several countries. Specialised software and hardware can come with hefty price tags and often require constant updates and expensive licensing agreements to keep up with the speed of technological change. The need to keep up with technological change can have a considerable impact on police budgets. This is an issue that has been raised by several countries regardless of their level of GDP (gross domestic product).

120. Investments in human capital are as important as those in software and hardware, if not more, particularly as they relate to the **lack of, and need to develop technical knowledge among law enforcement**. Evidence has pointed to a need to develop knowledge on (a) the emergence of new trends and changes in the use of technology; (b) the emergence of new apps and services in a tech market that is characterised by a rapid change and (c) the development of new security protocols and encryption methods. Crucially, knowledge needs to be distributed cleverly within an organisation. For instance, the lack of specialist officers at the local level can create bottlenecks in the investigations, if assistance from a (busy) centralised unit needs to be repeatedly sought.

121. Several countries have highlighted the need to provide additional technical training to all police officers, including knowledge on technology and how it works. Similarly, adequate training on the acquisition and handling of electronic evidence needs to be provided to the largest number of relevant officers and should be made a regular topic in training curricula for police officers. In more complex cases, teams with multidisciplinary skill sets might need to be set up (e.g., by bringing together investigators, financial specialists and cybercrime specialists).

122. Further challenges include issues stemming from the inadequate **data retention obligations** imposed on Internet Service Providers (ISPs), and the application of privacy laws, for example in relation to web-crawlers.

Challenges to prosecution

123. Overall, the challenges to prosecution score lower than those to investigations, with only "obtaining evidence from other countries" scoring slightly higher than 50 (out of 100). This is followed by lack of training among prosecutors (40), inadequate

legislative tools (38), and assistance from the private sector (33). Extradition of suspects (28) and attribution of jurisdiction (16) appear to play a marginal role.



124. Adequate training of prosecutors is seen as key to ensuring that ICT-facilitated cases are robust, that electronic evidence is properly collected and utilised, and that cases are adequately presented to a judge/jury. Some State Parties have noted instances in which prosecutors were not familiar with procedures to request electronic data from private companies or with those to obtain evidence and co-operation from other countries (e.g., via a Joint Investigation Team, JIT, or a European Investigation Order, EIO).

125. Some State Parties have raised the issue of dealing with electronic material, particularly in the context of **GDPR obligations** (EU General Data Protection Regulation). Concerns were also raised around international data protection regulations that can hinder the gathering, storing, and processing of information obtained with technological investigative techniques (such as web crawling).

126. Challenges have been noted around IP addresses and electronic evidence. IP addresses need to be linked to screen names and users where possible. However, screen names can be changed at any time and are often used by suspects interchangeably.

127. A further challenge relates to the **presentation of evidence** in front of a jury (and judge), as technical evidence in ICT-facilitated cases can be complex and often needs to be presented by an expert. Developing in-house expertise among officers on how to effectively and accurately present electronic evidence may be increasingly valuable.

Challenges to international co-operation

128. The lengthy turnaround time for the processing of Mutual Legal Assistance requests (MLAs) has been indicated by the vast majority of State Parties as one of the major obstacles to international co-operation. Mutual legal assistance procedures are seen as slow, sometimes unpredictable and in need of internationally agreed templates. This issue is particularly exacerbated when co-operation takes place outside the EU legal framework.

129. Co-operation outside the EU legal framework is seen as a time-consuming process and is characterised by greater intricacies due to the lack of harmonisation among different legal systems, alongside elements of unpredictability and inconsistency. Clearer operating procedures, enhanced regular exchange among contact points, clearly setting out MLAs' requirements, and discussion at the outset would help smoothen the process.

130. Technology allows criminal networks to organise and control exploitation activities from afar – for example, from another country – often knowing that requests for judicial co-operation will not be fulfilled in a timely manner, if at all. This creates the need for enhancing, or in some cases setting up, agreements with the victims' countries of origin if they are outside the EU.

131. Challenges in processing MLAs can also result from the lack of adequately trained personnel to compile and handle requests as well as the use of outdated technology.

132. Electronic evidence can make it difficult to identify the exact location of the data and the country under whose jurisdiction such data fall, thus making the drafting of an MLA request challenging.

133. Calls have been made for a common legal framework for the rapid exchange of digital evidence. Several countries have expressed concerns about the lack of a homogeneous regulation of data retention, hindering the exchange of electronic evidence. Overall, State Parties have expressed the need for a more comprehensive framework regulating the retention and transfer of electronic evidence and a common legal framework to replace current ad-hoc bilateral working agreements between States and private companies holding the data (see also below). State Parties have also highlighted the need to improve the exchange of data during investigations.

Challenges to co-operation with private companies

134. Several countries have indicated that ISPs (Internet service providers), content hosts and social media companies have generally been cooperative when it comes to issues related to THB and child sexual exploitation. Nonetheless, a number of challenges have been identified. These include:

- ▶ Obtaining a timely response from some ISP companies and content hosts. Approaching hosts via rogatory letters sent through relevant authorities might entail long waiting periods with the risk of content being deleted by the time the request is acted upon;
- ▶ Clarifying the legal requirements under which ICT companies and providers of Internet services operate. Some countries have expressed concern that some ISPs impose formalistic, "legally unjustified" requirements on law enforcement agencies and do not adequately motivate and explain refusals;
- ▶ Lack of a designated contact point within private companies. Large companies operating in multiple countries often lack staff possessing the language and legal skills relevant to each country they operate in;

- ▶ Lack of knowledge among content hosts and social media companies on which national agency is responsible for which decisions, e.g. taking down illegal content. There have been suggestions to introduce the role of ‘trusted flagger’, i.e. identify specific agencies that are tasked with liaising with international providers to take down content. The trusted flagger would have an open communication channel with the companies and build mutual trust.

Evidence from NGOs

135. Broadly speaking, the evidence from NGOs points to similar issues to those discussed above. More specifically, NGOs have highlighted the following issues:

- ▶ **Lack of capacity** among law enforcement, which includes lack of training, hardware and software and limited use of special investigation techniques. There is also a lack of specialisation among some police forces and judiciary related to technology-related THB;
- ▶ **Fast-changing technological landscape and offenders’ *modus operandi***. Professionals can find it hard to keep up to date with technology-facilitated THB, hindering their ability to promptly identify cases. Knowledge about technical landscape and practices (*modus operandi*) often sits in silos;
- ▶ Use of private forums, chat rooms or encrypted apps for contacts between offenders and victims. This makes it difficult to (a) detect such contacts and (b) acquire them as evidence to be used in court. NGOs have suggested including in chat rooms and apps information/warnings on the safe use of private channels of communications;
- ▶ **Rules about data protection and privacy** can hinder the identification of victims as well as traffickers. GDPR rules limit the use of technology to detect digital trails left by both victims and offenders;
- ▶ **Lack of interdisciplinary technology collaboration** among private companies, public agencies and NGOs to fully exploit the increasing amount of data on THB;
- ▶ **Lack of a technology strategy** in national action plans for combatting THB;
- ▶ **Lack of capacity, resources and technical tools** among NGOs to detect technology-facilitated online exploitation on a regular basis;
- ▶ **Conflicting goals** or different approaches between NGOs and law enforcement.

Evidence from tech companies

136. As noted above, only two companies provided replies to the questionnaire. Facebook noted that content related to human trafficking is “rarely reported” by users. IBM noted several obstacles to co-operation with law enforcement, including concerns about the legality of such co-operation, especially relating to data privacy and the legal complexity of multiple jurisdictions. IBM also called for clarifications on the international legal permissions for gathering and sharing data with law enforcement.



Strategies and good practices

Detection of ICT-facilitated cases of THB

137. Countries have indicated pursuing a variety of strategies to detect online and ICT-facilitated cases of THB. A widely cited strategy is **Internet monitoring**, including forums and, in some cases, TOR networks (Dark Web). This is combined with the use of **Open-Source Intelligence (OSINT)**, meaning collecting data from social media and other publicly available online sources about a person's network of contacts, living conditions and financial situation.

138. Some countries have formed "**cyber-patrols**" with **specialised officers** tasked with carrying out OSINT investigations on the Internet. Some jurisdictions allow for covert online investigations (cyber-infiltration).

139. **Web-scraping tools** specifically developed for extracting information from websites are used by some law enforcement agencies, particularly to identify risk and vulnerability on Adult Services Websites (ASWs).

140. Linked to OSINT investigations, there is the utilisation of **social network analysis techniques** to understand and reconstruct the network of contacts of an offender and/or victim. **Relational information** is key: information collected from different sources can be systematised and used **to reconstruct criminal networks**, i.e. relations among places, offenders and victims.

141. Not all State Parties, however, have indicated using "proactive" strategies. A few State Parties have indicated that their investigations into ICT-facilitated THB remain "reactive".

142. Several countries have implemented **systems for Internet users to report content and websites** that they suspect are linked to illegal activities, including sexual and labour exploitation. In some countries, for example, France, Internet access providers and website hosts are required to assist law enforcement in combatting the dissemination of materials related to specific offences, including THB. They are required to set up an easily accessible and visible system enabling any person to flag up suspicious material.

143. Some countries have reported the use of **awareness-raising campaigns** to increase detection of ICT-facilitated THB cases. These include awareness campaigns for clients who use websites hosting advertisements for sexual services to inform them of the risk of coming across THB cases (Belgium and UK) and campaigns providing information on how to look for safe work opportunities (Poland and Bulgaria).

The authorities of some countries have leveraged on social media to disseminate targeted information, sometimes by creating targeted Facebook advertisements linked to a tip-off line.

Investigation into ICT-facilitated THB cases

144. In some countries, law enforcement agencies carry out **cyber-infiltration** of criminal networks by using covert techniques as well as undercover investigations. Several countries have expressed the need to increase such undercover investigations, hence investing in the training of specialised officers. There is wide consensus on the importance of acquiring and having access to **specialised software** as well as on the importance of big data and improving big data capabilities. The development of tools for downloading information from mobile phones bypassing a passcode and for decrypting conversations over communication apps is also seen as key.

145. **Investing in human capital** is widely seen to be as crucial as investing in technological equipment. Investing in human capital may mean providing law enforcement officers with continuous training and development activities based on local and global best practices. Likewise, several countries have noted the importance of including specialised investigative officers with 'digital knowledge' in the THB investigations. One model would see the presence of personnel specifically trained in conducting investigations on the Internet and social networks embedded within each unit specialised in the fight against THB. This would create **technical support groups** for investigators. Such groups could be staffed by sworn police officers or non-sworn police officers. This idea moves away from the traditional police model based uniquely on sworn police officers and adopts the principles – already followed by some police forces – of having non-sworn officers in more technical roles (e.g., analysts).

146. Further, State Parties have highlighted the value of **inter-agency investigative work** with the involvement and co-operation of a wide range of specialised agencies – as well as knowledge sharing across institutions. Similarly, countries have noted the importance of **enhancing cross-border co-operation** through, for example, mutual exchange of officers with the countries of origin of victims. At the operational level, countries have noted that investigation could be facilitated by an easier cross-national preservation of evidence and its access.

147. When conducting investigations, it has been suggested that countries should not over-rely on a prescriptive list of indicators, e.g. to identify high risk online advertisement, but also rely on layering of information of different nature, including intelligence, open-source information, and police records. The **importance of network analysis and relational data** has been stressed.

148. Albeit time-consuming, **strategic analysis** generating knowledge on emerging trends and up-to-date information on offenders' *modus operandi* (including technology and websites used by offenders) is seen as very valuable.

149. Technology can also be used to **facilitate the collection of evidence from victims** both during the investigation and prosecution of THB cases and to lessen the burden on victims.

Fostering international co-operation

150. State Parties have identified the following good principles to foster international co-operation:

- ▶ Leveraging on resources available within agencies such as Europol and Eurojust, and setting up JITs, for those countries who are part to the EU Judicial Framework;
- ▶ Establishing contact with other interested parties at the early stage of an investigation;
- ▶ Developing a very good understanding of the legal context and opportunities for co-operation with other countries;
- ▶ Creating coordination meetings to exchange information and evidence as swiftly and as quickly as possible and to lay out a common strategy from the *outset*;
- ▶ Developing a common understanding of standardised approaches and ensuring transnational interoperability of law enforcement agencies through transnational training sessions.

151. Co-operation among non-police authorities, often neglected, can be as relevant as police co-operation, particularly in the context of THB for labour exploitation (e.g., between labour inspectorates).

Victims' identification and assistance

152. **Facial recognition** appears to be widely used in the case of Child Sexual Exploitation (CSE). However, its use appears to be more limited outside of CSE. A few countries have indicated the use of tech tools to identify victims of THB leveraging on big data (mostly web-crawlers but also facial recognition tools under stricter conditions).

153. Several countries rely on indicators for the identification of THB case ("**red flags**"); however, these are 'general' THB indicators and not specific to ICT-facilitated THB. While there is a clear need to develop indicators specific to ICT-facilitated THB, authorities have also cautioned against over-relying on "red-flags". Even in cases in which indicators have been developed specifically for the identification of victims on adult services websites (ASWs), as in the UK, the indicators show some clear limitations and are best used in conjunction with **social network analysis and human assessment** of the evidence.

154. Tech tools can be very valuable in performing data reduction and handling large volumes of information; however, they need to be employed by well-trained operators with knowledge of the specific topic/issue (e.g., THB). Using artificial intelligence and tech tools to identify victims is not without issues, including ethical concerns and the potential for discrimination (e.g., profiling based on discriminatory criteria; see also below).

155. With regards to technology-based initiatives to assist victims and disseminate information to at-risk communities, countries have identified examples of: (1) online self-reporting mechanisms and helplines, including digital assistance through a

chat function; (2) online awareness-raising campaigns, often targeting specific at-risk groups (e.g., job seekers); (3) purposely developed apps and online tools; and (4) official materials made accessible online and translated in several languages. A good practice is working with private companies to produce **social advertising** (e.g., co-developed with and co-sponsored by social media). However, online campaigns should not replace direct, personal contacts with vulnerable individuals.

Evidence from NGOs

156. NGOs have stressed the importance of having **adequate and up-to-date information** that can be easily accessed online by trafficked persons and those vulnerable to exploitation and abuse. Such online platforms should also **allow for self-identification** of victims. This should be coupled with **awareness-raising campaigns**.

157. NGOs have further highlighted the importance of developing knowledge about ICT-related risks, and more generally technology-facilitated THB, also among organisations that assist victims, including counselling services. As **preservation of electronic evidence** is key to building strong investigations, it is crucial that counsellors and NGOs first respondents are familiar with strategies to preserve digital evidence (e.g., by storing chat histories).

158. Evidence from NGOs confirms that “red flags” for technology-facilitated THB cases are not widely used. NGOs report using standard indicators, but they call for a **review of such indicators** to consider the specificities of technology-facilitated ICT.

159. NGOs have identified examples of **tech-based initiatives** that they have developed to (a) foster online self-reporting; (b) establish contact with at-risk population, e.g., to break isolation and empower victims; (c) raise awareness among vulnerable and at-risk groups, and seek help, via purposely built apps and websites; and (d) produce online awareness campaigns.

160. Generally speaking, NGOs are increasingly making use of technology, but their overall level still remains “limited”. There is a wide consensus that more can be done to leverage on technology, in particular with respect to the way technology is used to disseminate information; to approach potential victims and communicate with them; and to receive tips and reports.

161. NGOs have also raised some critical issues related to initiatives and tech tools, including the need for testing periods for new tools and — crucially — evidence on their effectiveness (which is still very limited). They called for **more evaluation and impact assessment** of the technology tools developed. Additionally, there is often no long-term financial strategy to promote and utilise the tools produced, including resources to keep them up-to-date. NGOs also stressed that, overall, there is still a limited availability of technological **tools that practitioners can use** (to suits the needs of NGOs, tools need to be “cheap and ‘easy to use’”).



Training: what is provided, what is needed

162. The vast majority of countries reported delivering training on THB. However, the levels and formats of **training provided to law enforcement** vary across countries. Some countries require all police officers that might come into contact with a potential victim to undergo such training while others limit training to specialised units.

163. There is a consensus on the fact that officers need to receive training on (a) how to detect THB cases and victims; (b) how to collect, store and process electronic evidence, including methods of extracting information from computers and other digital media; and (c) how to use relevant software, including 'Big Data Analysis' and web-crawlers (where allowed by domestic legislation). Training on OSINT is seen as essential by several countries. Investigative techniques involving covert online investigations are also seen as increasingly important.

164. While most countries have reported providing elements of the abovementioned training, they have also flagged up issues, including (a) the need to keep training up-to-date and, in some cases, to considerably enhance current provisions; and (b) to increase the proportion of personnel that receives training. Some countries have expressed concerns about the limited training that is often provided in relation to ICT-related issues and, even more so, ICT-facilitated THB.

165. Looking ahead, the risk of bottlenecks in the system is particularly acute. As ICT-facilitated crimes, including THB, are likely to continuously increase, there is a need to not over-rely on centralised cybercrime centres. It is crucial to include general/basic 'cyber' knowledge in routine training provided to investigators rather than seeing this as a set of 'specialised' skills in order to avoid such bottlenecks.

166. **Six broad areas emerge as critical for capacity building:** collection and analysis of open source information (OSINT); data collection from social network profiles and communication apps as well as Darknet/TOR network; examination of information present on communication and information storage devices, including information deleted by users as well as knowledge on encryption; ability to

corroborate data acquired from ICT sources with additional evidence acquired during the criminal investigation; identification of victims/potential victims in the online environment; economic and financial crime training with an element dedicated to online transactions and potentially cryptocurrencies.

167. Provision of **training to prosecutors and judges** in relation to ICT-facilitated THB is rather uneven across State Parties. Several countries have indicated that they are not currently providing any training on this phenomenon to the judiciary. Other countries provide general training on THB without any element specifically focused on ICT-related issues.

168. **NGOs** have expressed a need to receive training from domestic law enforcement authorities and international organisations on the latest developments in both the technological and THB landscapes, including changes in recruitment strategies. They also flagged up the need for training on international best practice and sharing of experiences across countries.



Legal instruments

Gaps in the current international framework

169. Overall, State Parties have expressed a positive view of the available legal instruments enabling co-operation across countries in combating THB. The Council of Europe Conventions on Mutual Legal Assistance and on Cybercrime are considered among the “most commonly” used instruments and, overall, are judged as “adequate”. Nonetheless, State Parties have identified some potential gaps and areas in which the current legislation might be improved. The main gaps identified relate to:

- ▶ Absence of a commonly agreed (standardised) legal environment underpinning exchange between Internet service providers and authorities when dealing with specific investigations;
- ▶ Provisions that allow for a more timely response from private companies to data requests;
- ▶ Provisions to compel private companies to disclose information upon direct request/order from another State Party;
- ▶ Provisions implementing shared rules on data retention;
- ▶ Provisions to facilitate the collection of victims’ testimonies and their use in a different country;
- ▶ Issues around transnational measures against websites hosting materials that can be linked to the facilitation of victims’ exploitation;
- ▶ Provisions introducing a “duty of vigilance” by companies on their entire supply chain;
- ▶ Use of terminology that does not always allow for legislation to evolve in parallel with changes in traffickers’ *modus operandi*;
- ▶ Differences in the transposition of the THB offence (as per the UN Palermo Protocol) in domestic legislations.

The Cybercrime (Budapest) Convention and the fight against ICT-facilitated THB

170. The Council of Europe’s Cybercrime (Budapest) Convention is the most relevant instrument geared towards ICT-facilitated crime that is cited by State Parties. State Parties consider the provisions related to procedural law as the most valuable in the context of ICT-facilitated THB (Chapter II, Section 2 of the Convention). Furthermore, they have highlighted the **importance of non-restricting procedural measures to offences explicitly listed** (e.g., those in Chapter II, Section 1). The Convention clearly achieves its full potential only when it is not restricted to the offences explicitly listed in Chapter II, Section 1. This is particularly true in the context of ICT-facilitated THB.

171. Several countries have indicated the utility of provisions included in Chapter III of the Convention on international co-operation as a legal basis for **gathering and sharing electronic evidence** across countries. The Convention establishes a network of contact points. While this is an important tool, looking forward, it is likely that – with the increasingly central role played by ICTs and the electronic evidence

– such contact points will be under increasing pressure – and quickly overwhelmed if not adequately staffed. This speaks to the issue of bottlenecks within a system, where the contact point is located within the criminal justice system is key and can be very consequential.

172. Looking ahead, the following steps can allow the **Cybercrime Convention to be further utilised** to fight THB:

- ▶ Implementation of the Second Additional Protocol to the Convention, which was adopted in November 2021 and will be opened for signature on 12 May 2022;
- ▶ Completing the harmonisation of national legislations with the Cybercrime Convention to leverage on its full potential;
- ▶ Wider and enhanced training on the possibilities offered by the Cybercrime Convention as not all State Parties are currently using the tools available to their full potential;
- ▶ Greater awareness on the scope of the procedural provisions included in the Convention, as the evidence has suggested some degree of disagreement among respondent countries on the extent to which the current provisions can be applied to THB cases;
- ▶ Implementation of a procedure to accelerate provision of MLA by allowing for the possibility to send a request directly to an entity located in a foreign jurisdiction provided that the judicial authority of that country is notified;
- ▶ Building synergies between GRETA and the Cybercrime Convention Committee (TC-Y) to continuously assess the use of the Cybercrime Convention in the context of THB.

Challenges identified by NGOs

173. NGOs have noted “clear restrictions” related to **data protection (GDPR) and privacy rules**. Further, they call for legislation allowing for **digital forensics** as admissible evidence in all jurisdictions. Further challenges relate to updating regulations to take into account cybercrime and the Internet as well as devising legislation and operating rules for digital investigations.

Domestic legal frameworks related to the removal of THB-related content

174. The great majority of countries have legal measures in place to regulate the identification, filtering, and removal of THB-related Internet content. The measures often do not specifically refer to THB but “illegal content” more generally (the exception being child sexual exploitation materials). In some countries, procedures to remove THB-related content require a court order. Some of these countries regard these procedures as “too rigid” or not effective, and they advocate for more efficient means. Finally, some countries have stressed that providers located abroad can easily bypass national legislations on the legal responsibility of host providers.



Human rights, ethics and data protection

Evidence from State Parties

175. All State Parties have indicated the adoption of domestic legislation regulating **data processing** and **data protection**. Regarding the **personal protection of victims**, a number of countries have noted the introduction of measures to prevent offenders from making contact with victims; the questioning of witnesses through videoconferencing to prevent contact with the defendants; and in some cases the possibility for victims to give evidence in court anonymously to protect their identity.

176. State Parties have indicated that they have **age-sensitive protocols** in place in the form of different sets of procedures and safeguards that are normally applied depending on whether the victim is a child (under 18). As for **gender-sensitive protocols**, all countries for which this information is available have indicated that they do not have such protocols in place, the only exception being Austria, which has indicated a separate support system based on the victim's gender.

Evidence from NGOs

177. As a standard procedure, NGOs ask for the victim's consent before sharing information with law enforcement. Issues arise when victims are reluctant to file a complaint with the police for a variety of reasons, including the risk of retaliation, social exclusion or potential for the victim's being deported. NGOs estimate that this is the case for many trafficking victims. Issues of data protection and data sharing can generate moral dilemmas. While sharing data with law enforcement and filing complaints *does* support investigations, which in turn can potentially save and protect more victims down the line, it comes to a cost to the individual victim, which might be exposed to risks and threats.

178. NGOs have called for more attention to the **potential risks and harm generated by large scale data collection and tech tools**. They also called for further reflection and additional control measures on the use of data and their secured storage – and to ensure that data protection rules are followed.

179. Finally, there is very limited evidence of gender-sensitive protocols developed by NGOs. Age-sensitive protocols are normally in place based on whether the victim is a minor or an adult.

Further evidence from the landscape analysis

180. ICT can have a considerable impact on the **human rights** of individuals, including the rights to privacy, freedom of expression and freedom from discrimination. Technology-heavy policies to combat human trafficking need to be designed with consideration for human rights.

181. Key issues have been identified relating to **data privacy, ethics, transparency, accountability, and informed consent**. OCSE (2020) identified a number of ethical issues related to the development of technology to combat human trafficking, including: (a) protection of data privacy; (b) consent protocols signed by victims; (c) training for people handling sensitive data, particularly victims' data; (d) secure storage of data; (e) preventing the use of technology for obtaining sensitive data about vulnerable people (for instance, blanket collection of data over vulnerable or marginalised populations, creating risks of discriminatory practices); and (f) using technology in a way that does not infringe human rights of victims as well as those of the general population. ICAT (2019) and other sources have pointed to the sensitivity around data sharing. When data is shared between countries and/or relevant agencies, it needs to be done in accordance with the principles of privacy and confidentiality.

182. Gerry et al. (2016)³² warned about the risk of widespread **tracking tools** to combat human trafficking. While such technology can offer new opportunities to intervene in trafficking situations, it also consists of **a form of surveillance that is potentially highly invasive** on a person's privacy.

183. Finally few sources, including Milivojevic et al. (2020)³³ and Gerry et al. (2016)³⁴, have highlighted the importance of **not cutting victims out of technology**, as access to technology can be their only way to communicate with the external world, and may serve as an important coping mechanism. Removing access to technology can be disempowering to victims; promoting safe access to technology should be privileged instead. More generally, the best interest of the victim should be placed at the centre of any action.

32 Gerry F., Muraszkiwicz J. and Vavoula N. (2016). "The role of technology in the fight against human trafficking: Reflections on privacy and data protection concerns". *Computer Law and Security Review*, 32:2, 205-217.

33 Milivojevic S., Moore H., and Segrave M. (2002). Freeing the Modern Slaves, One Click at a Time: Theorising human trafficking, modern slavery and technology. *Anti-trafficking Review*, (14), 16-32

34 Gerry F., Muraszkiwicz J. and Vavoula N. (2016). "The role of technology in the fight against human trafficking: Reflections on privacy and data protection concerns". *Computer Law and Security Review*, 32:2, 205-217



Recommendations

Actions to enhance detection of technology-facilitated THB cases

1. Law enforcement should invest in capacity building in the areas of **Internet monitoring, cyber-patrols, undercover online investigations (cyber-infiltration), the use of OSINT by specialised officers, social network analysis**, and the use of **automatic searching tools** to analyse evidence. The development and use of such tools must adhere to the rule of law principles. Countries should consider adapting existing legislation to allow for cyber-patrolling and covert online investigations (cyber-infiltration) – with careful consideration for ethical implications. Authorities should also consider investing in tools to assist investigators in handling and processing large-volume data (big data capabilities). Resources could be pooled at the supranational level for the development of technological products, such as web-crawlers as well as sharing expertise on their use.
2. Law enforcement and labour inspectorates should implement **more stringent regulations and frequent controls on job advertisement websites**. This could be done with the support of technological tools developed in co-operation with private companies (e.g., online job advertisement validator tools, tools to scrape job advertisements sites and apply THB markers). Labour inspectorates **should develop digital expertise and increase their online presence**.
3. Countries/private providers/NGOs must enhance **online confidential reporting mechanisms**, allowing anonymous reporting of THB cases as well as victims' self-identification. Chat, including chatbots, and instant messaging functions could be valuable online tools. Countries should work with private companies offering online services to **design out opportunities for traffickers**, develop **content analytics** to detect THB instances and set up easily accessible mechanisms for clients to **flag up** suspicious activities/advertisements. Where allowed by domestic legislation, this should be extended to companies offering online adult services. Online content and information (e.g., IP addresses) linked to flagged activities/advertisements should be stored securely by companies.

Actions to enhance investigation of technology-facilitated THB

4. Law enforcement should consider training officers specialised in both ICT and THB. Countries should also consider creating **technical support groups** staffed by sworn or non-sworn police officers with specialised ICT capabilities embedded within THB units. Furthermore, countries should review the design of the internal **distribution of digital investigative capabilities** to anticipate and avoid potential **bottlenecks in investigations**. As ICT-facilitated crime, including THB, is likely to continuously increase, the lack of specialist officers at the local level and the overreliance on assistance from (busy) centralised cyber-crime units are likely to create bottlenecks.

5. Law enforcement should make sure that **all officers** possess an adequate level of expertise in collecting and handling **electronic evidence**. Training on electronic evidence should be made integral to training curricula and constantly kept up-to-date due to the fast-changing technological and behavioural landscape. As the preservation of electronic evidence is key to building strong investigations, also **counsellors and NGOs first-respondents** need to be familiar with strategies to preserve digital evidence (e.g., by storing chat histories).

6. Countries/international organisations should regularly carry out a **strategic analysis** to generate knowledge on emerging trends on offenders' *modus operandi* as well as to keep up-to-date with the fast-changing behavioural patterns of technology users and the technological landscape. Based on this strategic evidence, countries can then launch targeted police operations, set up co-operation agreements, as well as devise targeted awareness-raising campaigns. Knowledge should be regularly disseminated at the national and supra-national levels.

7. Countries should increase cross-border co-operation through **streamlined procedures**, the **sharing of best practices and technologies** (e.g., specialised software) and the enhanced **dissemination of practical information** about the contact points/dedicated units that serve as "privileged contact" in the case of THB cases, including ICT-facilitated THB. Co-operation and support between destination and origin countries should be encouraged (e.g., expensive technological equipment might be affordable only to more affluent destination countries).

Actions to enhance prosecution of technology-facilitated THB

8. Prosecutors should be provided with specific **training** on technology-facilitated THB and the handling of electronic evidence as well as its presentation before a judge/jury. Countries should take measures to ensure that **prosecutors are familiar with procedures** to request electronic evidence from private companies as well as obtaining evidence and co-operation from other countries both within the EU legal framework (via Joint Investigation Teams and European Investigation Orders) and outside the EU legal framework.

Actions to enhance co-operation with private companies

9. Countries should develop **data-sharing procedures** with companies holding relevant data and consider developing **co-operation protocols** with private companies, including social network and gig-economy companies as well as rental platforms to foster the timely provision of information. Such protocols/procedures should clarify the legal requirements under which ICTs companies, ISPs and content hosts operate; designate a contact point within companies; and clarify the national agencies responsible for specific actions, e.g. requesting evidence or taking down THB-related content. Refusal to share evidence or take down THB-related content should be timely, explicit, and motivated.

Actions to enhance international co-operation

10. A **smoother process should be established for Mutual Legal Assistance Requests (MLAs)**, including clearer procedures, increased usage of enhanced networks of contact points, including EJN contact points, and requirements for MLAs to be clearly set out and discussed at the outset. Countries should ensure that their personnel are adequately trained to process MLAs, EIOs and other international tools. Countries and international organisations should develop **commonly agreed and accepted templates** underpinning co-operation processes with a view to ease communication, decrease administrative burdens and minimise mistakes in the requests. Countries should also develop the use of **secure forms of electronic communication** and promote their adoption to smoothen international co-operation.

Actions to enhance training

11. **Joint Training Activities (JTAs)** should be envisaged for countries that are systematically engaged in joint THB cases. Transnational knowledge exchange can be fostered through participation in international/regional training focused on specific aspects of investigating ICT-facilitated THB. Such training should include case studies and scenarios on ICT-facilitated THB. Training on ICT-facilitated THB and associated legal instruments should also be provided to prosecutors and judges.

12. NGOs should receive training on the latest developments in both technological and THB landscapes, including changes in recruitment strategies. NGOs should be in a position to exchange experiences on international best practices.

Actions to enhance legal instruments

13. Authorities should devise **common procedures for the rapid exchange of digital evidence with ISPs** and should **re-assess the length of data retention obligations** imposed on ISPs (current periods are too short considering the length of police investigations). Efforts should be made to adopt a **common framework** regarding data retention obligations and sharing of electronic evidence.

14. To leverage on the full potential offered by the **Cybercrime Convention**, countries should (a) complete the harmonisation of national legislations with the Convention; (b) widen and enhance the training on the possibilities offered by the Convention as not all State Parties are currently using the tools available to their full potential; (c) raise awareness on the broad scope of the procedural powers and tools for international co-operation of the Convention, particularly in relation to THB cases; and (d) swiftly implement the measures included in the Second Additional Protocol.

15. Countries should carefully assess the issue of where their **contact point** (as per the Cybercrime Convention) is located within the criminal justice system to avoid **bottlenecks**. With the increasingly central role played by ICTs and electronic evidence, such contact points will be under increasing pressure and will be quickly overwhelmed if not adequately staffed. Countries might wish to consider staffing such contact points with personnel possessing expertise in different crime types, including ICT-facilitated THB.

16. Countries outside Europe should be encouraged to **adopt key international legal tools**, such as the CoE Cybercrime Convention and the CoE Convention on Mutual Assistance in Criminal Matters, to smoothen and enhance international co-operation.

17. **Co-operation and synergies** should be increased between the monitoring mechanism of the Anti-Trafficking Convention (GRETA and Committee of the Parties) and T-CY, for example, in the form of exchange of views as well as the development of capacity-building activities focusing on both conventions.

Actions to prevent victimisation and re-victimisation

18. Private companies, working with the authorities and NGOs, should increase online **social advertising** to prevent victimisation and improve the detection of technology-facilitated THB. Countries should increase their efforts to inform individuals about their employment rights in a language they understand, in co-operation with NGOs and with companies that provide hosting services for job advertisements. The impact of campaigns should be routinely evaluated.

19. Countries, NGOs and private companies that provide online and ICT services should run initiatives to **raise awareness on technology-related risks, including how traffickers might exploit technology** and how potential exploitative situations might begin. Schools and educators should be made part of this effort as children and young adults are exposed to heightened risks. Countries and NGOs should work with private companies offering communication and messaging services to design into the system information/warnings on the **safe use of private channels of communications**.

20. NGOs should offer training on techniques of data protection and safe use of technology as part of **victims' protection and reintegration programmes**. Victims should not be cut out of technology with the effect of disempowering them.

Cross-cutting action

21. Countries should include a technology strategy in their **national action plans** for combating trafficking in human beings.

Appendix 1

Chart of signatures and ratifications
of the Council of Europe

Convention on Action against
Trafficking in Human Beings

Status as of 31/12/2021

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							

	Signature	Ratification	Entry into Force	Notes	R.	D.	A.	T.	C.	O.
Italy	8/6/2005	29/11/2010	1/3/2011							
Latvia	19/05/2006	6/3/2008	1/7/2008		R.					
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.					
Republic of Moldova	16/5/2005	19/5/2006	1/2/2008			D.				
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.					
Romania	16/5/2005	21/8/2006	1/2/2008							
Russia										
San Marino	19/5/2006	29/11/2010	1/3/2011							
Serbia	16/5/2005	14/4/2009	1/8/2009	55						
Slovakia	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 2021)

Members	Term of office
President: Ms Helga Gayer (German)	31/12/2024
First Vice-President: Ms Antoaneta Vassileva (Bulgarian)	31/12/2022
Second Vice-President: Ms Julia Planitzer (Austrian)	31/12/2022
Mr Thomas Ahlstrand (Swedish)	31/12/2024
Mr Francesco Curcio (Italian)	31/12/2022
Ms Ia Dadunashvili (Georgian)	31/12/2022
Mr Sergey Ghazinyan (Armenian)	31/12/2024
Mr Aurelijus Gutauskas (Lithuanian)	31/12/2024
Mr Kevin Hyland (Irish)	31/12/2022
Ms Svala Ísfield Ólafsdóttir (Icelandic)	31/12/2022
Ms Nathalie Martin (French)	31/12/2022
Ms Connie Rijken (Dutch)	31/12/2024
Mr Peter Van Hauwermeiren (Belgian)	31/12/2024
Mr Georgios Vanikiotis (Greek)	31/12/2024
Ms Dorothea Winkler (Swiss)	31/12/2024

Appendix 4

Secretariat of the Council of Europe Convention on Action against Trafficking in Human Beings (as at 31 December 2021)

Ms Petya Nestorova, Executive Secretary of the Convention

Mr Alexander Bartling, Administrator (follow-up to GRETA's recommendations)

Mr Mesut Bedirhanoglu, Administrator

Mr Roemer Lemaitre, Administrator

Ms Daniela Ranalli, Administrator

Ms Asja Žujo, Administrator

Ms Susie Morgan, Principal Administrative Assistant

Ms Jackie Renaudin-Siddall, Administrative Assistant

Ms Giorgia Spada, Administrative Assistant^a

Ms Silvia Pedrini, Administrative Assistant^b

Co-operation and capacity-building unit

Ms Lilia Kolombet, Head of Unit

Ms Severina Spassova, Senior Project Officer

Ms Naz Gun, Project Officer

Ms Monica Petrovici-Ronecker, Project Officer

Ms Nadia Marino, Administrative Assistant

a Employed until 1 May 2021.

b Employed as from 21 June 2021.

Appendix 5

List of GRETA's activities during the period 1 January to 31 December 2021

GRETA meetings

- ▶ 40th meeting (22-26 March 2021)
- ▶ 41st meeting (5-8 July 2021)
- ▶ 42nd meeting (22-26 November 2021)

GRETA's evaluation visits (in chronological order)

- ▶ France (3rd evaluation round) 8-12 February 2021
- ▶ Portugal (3rd evaluation round) 14-18 June 2021
- ▶ Armenia (3rd evaluation round) 6-10 September 2021
- ▶ Bosnia and Herzegovina (3rd evaluation round) 6-10 September 2021
- ▶ Norway (3rd evaluation round) 20-24 September 2021
- ▶ Belarus (2nd evaluation round) 27 September - 1 October 2021
- ▶ Latvia (3rd evaluation round) 11-12 October 2021
- ▶ Belgium (3rd evaluation round) 25-29 October 2021
- ▶ Luxembourg (3rd evaluation round) 26-29 October 2021
- ▶ Ireland (3rd evaluation round) 6-10 December 2021

GRETA country evaluation reports (in order of publication)

- ▶ Georgia (3rd evaluation round) 16 March 2021
- ▶ Denmark (3rd evaluation round) 17 March 2021
- ▶ Bulgaria (3rd evaluation round) 29 April 2021
- ▶ Montenegro (3rd evaluation round) 2 June 2021
- ▶ Romania (3rd evaluation round) 3 June 2021
- ▶ United Kingdom (3rd evaluation round) 20 October 2021
- ▶ Malta (3rd evaluation round) 10 November 2021

Appendix 6

List of activities organised to support the implementation of GRETA's recommendations during the period 1 January to 31 December 2021

Online, 15 March 2021

Webinar presenting recent case-law of the European Court of Human Rights related to trafficking in human beings for the network of lawyers and NGOs specialised in providing legal assistance to victims of human trafficking

Strasbourg and online, 4-5 May 2021

Conference "Ending trafficking in children and young persons: Together, towards a future without child trafficking in Europe", under the German Presidency of the Committee of Ministers of the Council of Europe

Türkiye, 7 October 2021

Round-table on the implementation of GRETA's recommendations made in the first evaluation report on Türkiye

Prague, 8 November 2021

Round-table on the implementation of GRETA's recommendations made in the first evaluation report on the Czech Republic

Activities organised under the joint EU-Council of Europe programme Horizontal Facility II (HF) for the Western Balkans and Türkiye

- ▶ Regional conference "Acting together in face of crisis: Protecting children from trafficking and exploitation in the Western Balkans", 22-23 June 2021, online
- ▶ Introductory webinar of the HELP online module on trafficking in human beings for the purpose of labour exploitation, 4 November 2021 (Bosnia and Herzegovina, North Macedonia and Serbia)

Bosnia and Herzegovina

- ▶ Workshops on trafficking in human beings for the purpose of labour exploitation for labour inspectors and other relevant professionals, 25-27 January 2021 online, 3-5 March 2021 in Banja Luka, 19 November 2021 in Vlačić, 8 December 2021 in Doboј
- ▶ Round table on age assessment of presumed child victims of trafficking, 19 May 2021 online

- ▶ Workshops on protection of private life and personal data of victims of trafficking, 25 and 26 June 2021 in Tarčin, 15 and 16 July 2021 in Banja Luka, 30 September 2021 in Sarajevo
- ▶ Workshop on trafficking in children for legal professionals, 22 September 2021, Neum
- ▶ Round table on trafficking in human beings for the purpose of the labour exploitation, 18 October 2021, Sarajevo
- ▶ Advanced workshops on trafficking in human beings for the purpose of labour exploitation for labour inspectors and police officers, 17-18 November 2021 in Vlačić, 9-10 December 2021 in Dobož

North Macedonia

- ▶ Webinar on the rights of victims of trafficking in court proceedings for legal professionals, 17 March 2021, Skopje
- ▶ HELP online course on combating trafficking in human beings for judges, prosecutors and court advisors, March-April 2021, Skopje
- ▶ Webinar on protection of victims of trafficking for legal professionals, 12 April 2021, Skopje
- ▶ Webinar for journalists on human trafficking reporting and ethical journalism, 11 May 2021
- ▶ Workshop on preliminary identification and referral of victims of trafficking for labour inspectors, 20 May 2021, online
- ▶ Workshop on child-driven resocialisation and reintegration, 21 September 2021, Skopje
- ▶ Workshop on gender-sensitive assistance provision to victims of trafficking for social workers, anti-trafficking mobile teams and local Roma leaders, 28 September and 14 October 2021, Skopje
- ▶ Webinars on trafficking in children for education advisors and professionals, October-November 2021
- ▶ HELP online module on trafficking in human beings for the purpose of labour exploitation, November-December 2021
- ▶ Workshop on interviewing presumed child victims of trafficking for school psychologists and pedagogues, 24 November 2021, Skopje

Serbia

- ▶ HELP online course on combating trafficking in human beings for judges and prosecutors, October 2020-January 2021
- ▶ Webinar on protection of victims of trafficking for legal professionals, 22 January 2021
- ▶ Webinar on trafficking in human beings for the purpose of labour exploitation for labour inspectors and other relevant professionals, 16-18 March 2021
- ▶ HELP online course on combating trafficking in human beings for law students from the Belgrade University, April-July 2021

- ▶ Working group on the revision of the indicators for preliminary identification of child trafficking by education professionals, May-July 2021
- ▶ Round table on child-sensitive communication and interviewing child victims of trafficking, 20 September 2021, online
- ▶ Advanced workshops on trafficking in human beings for the purpose of labour exploitation for labour inspectors and other relevant professionals, 7 October 2021 and 30 November 2021, Belgrade
- ▶ Webinar on preliminary identification of trafficking in children by education professionals, 26-27 October 2021

Türkiye

- ▶ HELP online course on combating trafficking in human beings for lawyers of the Istanbul Bar Association, March-June 2021
- ▶ HELP online course on combating trafficking in human beings for judges and prosecutors, April-June 2021
- ▶ Webinar on the role of non-governmental organisations in the action against trafficking in human beings, 19 April 2021
- ▶ HELP online course on combating trafficking in human beings for Gendarmerie General Command, May-July 2020
- ▶ Conference on Criminal Justice Response to Human Trafficking, 29-30 July 2021, Ankara
- ▶ Webinar on prevention of trafficking in children, 18 October 2021, Skopje (North Macedonia)
- ▶ Round table on inter-institutional coordination on investigation and prosecution of human trafficking cases, 6-8 December 2021, Istanbul

Appendix 7

Updated provisional timetable of GRETA's 3rd Evaluation Round

Parties	Questionnaire to be sent	Deadline for replies	Evaluation visits	Draft GRETA reports	Final GRETA reports
Austria Cyprus Slovak Republic	November 2018	March 2019	May-June 2019	36th meeting November 2019	written procedure March 2020
Albania Croatia Republic of Moldova	February 2019	June 2019	September - December 2019	37th meeting July 2020	38th meeting October 2020
Georgia Bulgaria Denmark					39th meeting November 2020
Montenegro Romania	June 2019	October 2019	January - March 2020	38th meeting October 2020	40th meeting March 2021
Malta United Kingdom Latvia	September 2019	January 2020	September – December 2020	40th meeting March 2021	41st meeting July 2021
France	March 2020	September 2020	January – March 2021	41st meeting July 2021	42nd meeting November 2021
Portugal	September 2019	January 2020	April – June 2021	42nd meeting November 2021	43rd meeting March 2022
Armenia	July 2019	November 2019	September – December 2021		
Bosnia and Herzegovina Norway	March 2020	September 2020			
Belgium Ireland Luxembourg	October 2020	February 2021		43rd meeting March 2022	44th meeting July 2022
North Macedonia Slovenia Serbia Spain Poland	June 2021	October 2021	January – March 2022	44th meeting July 2022	45th meeting September 2022
Azerbaijan Netherlands Ukraine	September/ October 2021	January 2022	April – June 2022	45th meeting September 2022	47th meeting March 2023
				46th meeting November 2022	
Sweden	December 2021	April 2022	September – December 2022	47th meeting March 2023	48th meeting July 2023
Iceland Italy Andorra	April/May 2022	September 2022	January – March 2023	48th meeting July 2023	49th meeting September 2023
Lithuania					
San Marino Finland Germany	May/June 2022	October 2022	April – June 2023	49th meeting September 2023	50th meeting December 2023
Hungary	September 2022	January 2023			
Liechtenstein Monaco Switzerland	September 2022	January 2023			

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 events in the area of action against trafficking in human beings

Online, 26 January 2021

Meeting of the Network of Anti-Trafficking Co-ordinators of South-East Europe

Online, 27 January 2021

Westminster Legal Policy Forum keynote seminar “Next steps for tackling modern slavery - the impact of COVID-19, UK policy and organisational practice, and the global response”

Online, 28 January 2021

Panel discussion “The Impact of the COVID-19 Pandemic on Trafficking in Persons”, organised by the U.S. Committee for Refugees and Immigrants (USCRI)

Online, 1-2 March 2021

International Seminar on the Trafficking of Human Beings, organised by the Ministry of Foreign Affairs of Spain

Online, 2 March 2021

Conference “Combating sex trafficking of women in Europe: a facet of slavery in the 21st century, organised by the Association MAES (Master of European Affairs of Sorbonne University)

Online, 4 March 2021

UNODC/IOM Expert Group Meeting on Draft Toolkit on the Investigation and Prosecution of Trafficking in Persons for Organ Removal

Online, 3- 4 March 2021

UNODC Regional Expert Group Meeting: “Access to Effective Remedies for Victims of Trafficking in Persons in South-Eastern Europe”

Online, 27 March 2021

International Conference on Combating Human Trafficking, with special reference to the northern part of Cyprus, organised by the EU funded COMMIT Project implemented by Refugee Rights Association and Justice for Human Trafficking Victims Project implemented by Cyprus Turkish Bar Association

Online, 6 April 2021

REST Seminar Strengthening the protection of victims of human trafficking: access to residency and international protection, organised by the Comité Contre l’Esclavage Moderne (CEEM)

Online, 13 April 2021

UNODC Regional Expert Group Meeting “Trafficking in Persons for Labour Exploitation, Particularly Children in South-Eastern Europe”, in collaboration with the National Coordinator for Combating Trafficking in Human Beings of Bosnia and Herzegovina

Strasbourg/Online, 4-5 May 2021

Conference “Ending Trafficking in Children and Young Persons: Together, towards a future without child trafficking in Europe”, organised in the framework of the German Presidency of the Committee of Ministers of the Council of Europe

Online, 6 May 2021

Council of Baltic Sea States Conference “Trafficking in the Digital Era”

Online, 11-12 May 2021

UNODC regional expert group meeting “Trafficking in persons for sexual exploitation, through addressing demand in South-Eastern Europe”

Online, 17 May 2021

Webinar “Sex work, migration, exploitation and trafficking in Europe”

Online, 26 May 2021

Roma Women’s Access to Justice, Trafficking in human beings in Bulgaria, organised by JUSTROM3

Online, 27 May 2021

Forum on Sport and Human Rights (roundtable on young migrant athletes and human trafficking), organised by the Enlarged Partial Agreement on Sport (EPAS)

Online, 9 June 2021

Council of Baltic Sea States conference “Competence building, assistance provision and prevention of trafficking in human beings for labour exploitation”

Online, 14-16 June 2021

OSCE 21st High-level Alliance against Trafficking in Persons conference entitled “Confronting Demand: Tackling a root cause of trafficking in human beings”

Online, 29 July 2021

Presentation at the Summit on Combating Human Trafficking, Türkiye

Amsterdam, 15 September 2021

Public debate “Shrinking space and role of civil society in addressing trafficking in human beings”, organised by La Strada International on the occasion of its 25th anniversary

Online, 5 October 2021

International conference “Labour Integration of Women Victims of Trafficking from Third Countries – Tackling Multiple Vulnerabilities”, organised by WIN – Trafficked Women Integration

Berlin, 14-15 October 2021

Symposium - Defining the Gap – Trafficking in Human Beings and Data Policy, organised by the German NGO Network against Trafficking in Human Beings (KOK)

Online, 15 October 2021

34th meeting of the Council of Europe/OSCE Co-ordination Group

Strasbourg, 25 October 2021

Annual meeting of the Secretary General and heads of monitoring and advisory bodies of the Council of Europe

Strasbourg/Online, 15-16 November 2021

Meeting of National Anti-Trafficking Co-ordinators and Rapporteurs or equivalent mechanisms, co-organised by the Council of Europe and the OSCE

Online, 15 November 2021

ICAT Principal Level Meeting

Strasbourg, 16 November 2021

Training on International Human Rights Law – The Actions of the Council of Europe

Strasbourg, 16 November 2021

Presentation at the Training course on International Human Rights Law – Council of Europe actions, organised by the Fondation René Cassin

Finland, 18 November 2021

Seminar on Nordic Best Practices against Trafficking in Human Beings, organised by the Nordic Council of Ministers

Online, 17 November 2021

5th Meeting of the Steering Group of the MARRI project Preventing and Combating Human Trafficking in the Western Balkans

Online, 23 November 2021

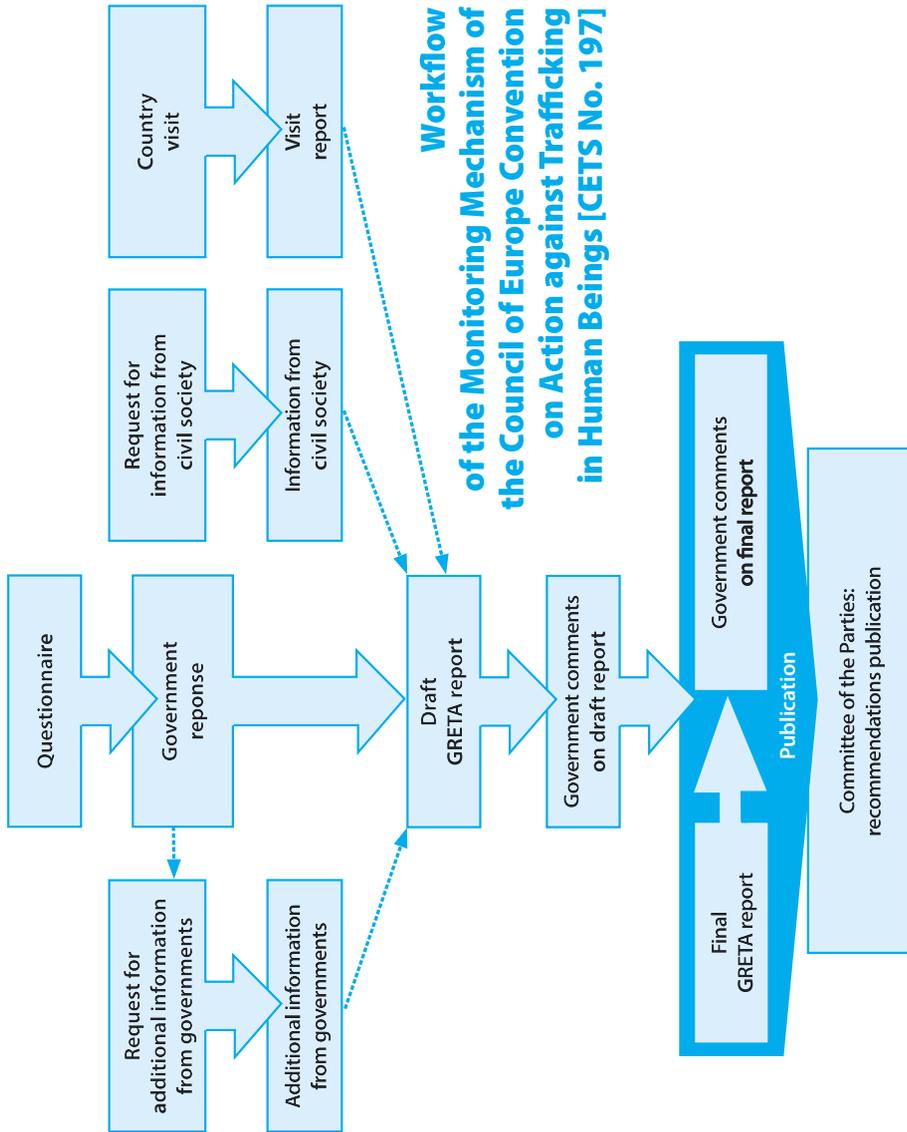
Conference “Combating human trafficking and forced labour – What must Germany do by 2030”, organised by the German Ministry of Labour and Social Affairs

Vienna and online, 16 December 2021

Alliance Expert Co-ordination Team (AECT) meeting

Appendix 9

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



www.coe.int

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.

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE