

SafeBorders

Strengthening Capacities Across Borders

A Handbook on Challenges and Best Practices in Combating Child Trafficking

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This Handbook provides a structured and comparative overview of the key challenges and best practices identified in combating child trafficking across partner countries. It synthesises findings from mapping and contextual analysis, legal and institutional review, and extensive stakeholder consultations, examining trafficking patterns, routes, victim vulnerabilities, and organisational models, as well as national frameworks in eight EU Member States. Organised around the Four Ps–prevention, identification, protection, prosecution, and partnership–building–it highlights common gaps, promising practices, and practical tools, while offering evidence-based recommendations to strengthen judicial expertise, frontline response, and cross–border cooperation. Developed under the SafeBorders project, funded by the European Union, the Handbook serves as a strategic reference framework to support coordinated, multi-stakeholder action against child trafficking.

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Co-funded by the European Union

Co-Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Commission (granting authority). Neither the European Union nor the granting authority can be held responsible for them.

ISBN: 978-954-477-560-5

Cover photo: Vecteezy

Published by: Center for the Study of Democracy, 2026.

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List of Abbreviations

CBSS	Council of the Baltic Sea States
CEPOL	European Union Agency for Law Enforcement Training
CIG	Commission for Citizenship and Gender Equality (Portugal)
e-CODEX	e-Justice Communication via Online Data Exchange
ECRIS	European Criminal Records Information System
EUAA	European Union Agency for Asylum
EASO	European Asylum Support Office
ELA	European Labour Authority
EMPACT	European Multidisciplinary Platform Against Criminal Threats
EU	European Union
Eurojust	European Union Agency for Criminal Justice Cooperation
Europol	European Union Agency for Law Enforcement Cooperation
FRA	European Union Agency for Fundamental Rights
Frontex	European Border and Coast Guard Agency
HEUNI	The European Institute for Crime Prevention and Control, affiliated with the United Nations
IOM	International Organization for Migration
ILO	International Labour Organization
JIT	Joint Investigation Teams
Interpol	International Criminal Police Organization
NGO	Non-governmental organization
OSCE	Organization for Security and Co-operation in Europe
OTSH	Observatory on Trafficking in Human Beings (Portugal)
SIS	Schengen Information System
UN	United Nations
UNDOC	United Nations Office on Drugs and Crime
UNICEF	United Nations Children's Fund

PART I PURPOSE, SCOPE, AND METHODOLOGY

Introduction

This Handbook is developed within the framework of the **Strengthening Judicial Expertise and Frontline Support to Combat Child Trafficking (SafeBorders)** project.

SafeBorders aims to address the issue of child trafficking by enhancing the capacities of judicial authorities and frontline professionals. It focuses on identifying risk patterns and vulnerabilities, mapping protection and reintegration actors, analysing legal and procedural frameworks, and strengthening transnational cooperation to detect criminal networks. The initiative combines targeted training for prosecutors and frontline staff with the development of an AI-based tool to identify cross-border trafficking patterns, and concludes with a public awareness campaign to support early detection and intervention.

The project is implemented by a consortium from eight EU member states: the Centre for European Constitutional Law (CECL, Greece), coordinator of the project, the Ministry of Migration and Asylum of the Hellenic Republic (MoMA, Greece), Cesie Ente Del Terzo Settore (CESIE, Italy), the Center for the Study of Democracy (CSD, Bulgaria), Missing Children Europe (MCE, Belgium), Asociatia Pentru Dezvoltarea Practicilor Alternative de Reintegrare si Educatie (ADPARE, Romania), Fundacja Vela Organizacja Humanitarna na Rzecz Ochrony i Edukacji (VELA, Poland), Qualify Just – IT Solutions and Consulting SA (IPS_Innovative Prison Systems), Portugal, in IPS, The European Institute for Crime Prevention and Control, affiliated with the United Nations (HEUNI, Finland) and Associacao Saude em Portugues (SAUDE, Portugal).

The Handbook is designed for a broad community of practitioners who encounter child trafficking in their daily work – prosecutors and judges, law enforcement officers, social workers, child protection professionals, and other frontline actors. Its purpose is deliberately practical. It provides structured, evidence-based guidance across the key pillars of anti-trafficking response: prevention, early identification, victim protection and assistance, effective prosecution, and effective partnership-building.

The core ambition of this Handbook is to bring coherence to a field that is often experienced as complex and fragmented in practice. It brings together the relevant international and EU legal and institutional frameworks and connects them with concrete evidence from eight EU Member States (Belgium, Bulgaria, Finland, Greece, Italy, Poland, Portugal and Romania). These national perspectives – drawn from mapping exercises, interviews with practitioners, and practical assessments – shed light on how systems function on the ground, where they fall short, and where collaboration genuinely makes a difference.

From an operational perspective, the Handbook gathers existing tools currently in use across countries and sectors, organises them thematically, and presents them in a clear and accessible format. This approach helps reduce duplication, makes gaps more visible, and supports practitioners in identifying which tools are most relevant at different stages of a case, ultimately enabling more consistent, timely, and child-centred responses.

Methodological Note

The Handbook is built on a multi-layered methodology that combines mapping, qualitative research, and comparative analysis across eight EU Member States – Belgium, Bulgaria, Finland, Greece, Italy, Poland, Portugal and Romania. The goal is to understand how child trafficking is addressed in practice, what are the systems' main gaps, and which approaches appear most promising.

On the national level the research was carried out in two stages and resulted in eight country reports. The first stage was carried out through desk analysis, which covered the period from 2018 to 2025. This involved examining the institutional landscape in each country, identifying the key actors involved in anti-trafficking work, and reviewing the legal and procedural frameworks governing prevention, identification, protection, prosecution, and partnership-building. In parallel, the analysis considered broader socio-economic factors that shape children's vulnerability to trafficking.

In the second phase of the research, qualitative data collection was carried out. Based on 28 focus groups with professionals from different fields and operational experience, discussions tested the mapped frameworks against lived practice, highlighting practical challenges, coordination gaps, limitations of existing tools, and the realities of cross-border case management. A total of 112 individual interviews were conducted with selected experts, allowing for more candid and detailed exploration of sensitive issues and opportunities for improvement.

Building on this body of evidence, a comparative analysis was undertaken to identify common challenges and promising practices across the eight partner countries. Country-specific information presented in this Handbook is drawn entirely from the findings of the country reports, which are publicly available and are referenced in Annex I: Country-specific bibliography.

Part II Thematic Framework provides an overview of child trafficking trends in the eight partner countries over the past eight years (2018–2025). Drawing on the country reports, it identifies the most common forms of child trafficking, the ways in which exploitation is typically organised, and the main vulnerabilities and socio-economic factors that expose children to risk. It also highlights country-specific patterns, showing how national contexts shape risks.

It also maps the legal and institutional frameworks for combating trafficking in human beings in each country. It examines how national systems are structured, identifies the key institutional stakeholders involved, and outlines their respective roles and responsibilities within the anti-trafficking response.

To make the analysis more focused and accessible for practitioners, the Handbook then adopts a thematic approach. It explores the findings of the country reports across the key areas of anti-trafficking action–prevention, identification, protection, prosecution, and partnership. The Handbook formulates recommendations aimed at addressing the identified gaps, strengthening existing practices, and supporting more coherent, child-sensitive responses across prevention, identification, protection, prosecution, and partnership-building.

In parallel, the Handbook takes stock of the practical tools already in use across the eight partner countries, organising them by function and stage of intervention. Bringing these tools together in one accessible and user-friendly format helps reduce fragmentation, supports informed decision-making, and makes it easier for practitioners to identify the right tool at the right moment.

Finally, a country-specific bibliography is included in an Annex to the Handbook. In addition to the country reports, it compiles all references cited by partners, grouped by document type. While many sources are available only in their respective national languages, their structured presentation enables readers to explore country-specific contexts in greater depth where needed.Together, these elements allow the Handbook to distill complex evidence into clear, practical guidance that supports frontline professionals in preventing trafficking, identifying and protecting child victims, and strengthening investigations and prosecutions, while ensuring that victim protection and child welfare remain central throughout.

PART II THEMATIC FRAMEWORK

Understanding Child Trafficking in Europe

Child trafficking in Europe is not a uniform phenomenon. Despite different socio-economic contexts and institutional capacities, the same vulnerabilities, recruitment logics, and criminal practices appear across borders. What tends to vary is each country's position within the wider trafficking landscape: some are primarily countries of origin, others of transit or destination, and many play all three roles at once. It is important to examine how well national systems are able to recognise these realities in practice and respond in ways that identify, protect, and support trafficked children early and effectively.

A key cross-cutting finding of the research concerns significant inconsistencies in data collection. In some cases, data are not maintained in a single integrated database but are instead collected separately by different authorities, using divergent statistical categories and encoding methodologies (e.g. **Belgium**), others collect data on both presumed and formally identified child victims (e.g. **Greece, Portugal, Italy**), while some register only formally identified child victims (e.g. **Bulgaria, Finland, Poland**). In **Romania**, data further includes victims of child sexual abuse material within child trafficking figures. In addition, countries report data covering different time periods over the past eight years, limiting comparability.

Another important consideration is that findings on trafficking typologies, patterns, and victim profiles are informed by fieldwork, as well. As the fieldwork involved professionals from different sectors, references may relate to different categories of victims: judicial actors (such as prosecutors and judges) typically refer to formally identified victims, while frontline practitioners (such as social workers in shelters or police officers) often work with presumed victims. For these reasons, this Handbook avoids citing specific figures and instead focuses on general trends encompassing both presumed and formally identified child victims.[1]

1. Typologies and Patterns of Trafficking

Forms of Exploitation

Four dominant typologies emerge across the dataset: **sexual exploitation, labour exploitation, exploitation in criminal activities and exploitation in begging**. Each manifests differently in each national context, but the underlying logics – economic marginalisation, structural inequality, migration dynamics, and digital evolution – are remarkably consistent.

Sexual exploitation remains the most widespread and consistently identified form of child trafficking across the partner countries, though its visibility and data quality vary. **Romania** and **Bulgaria** present the most clearly established patterns: in both, adolescent girls dominate the victim population, trafficked internally and across Europe in long-standing transnational circuits. Recruitment relies heavily on manipulation – romantic coercion, false promises, or the "Loverboy" method[2] – which remains pervasive in **Romania** and is increasingly visible in **Bulgaria** and **Italy**.

1 All available country-specific data is contained in the respective country reports.

2 While the consortium partners acknowledge that the term "Loverboy" is imprecise and not considered appropriate terminology, it remains widely used and recognized by judicial authorities. For clarity and consistency with official sources, the term is therefore referenced in this report.

Romania – Transnational Sexual Exploitation Case (2025)

This case involved the sexual exploitation of one minor and two adult women, all Romanian nationals, between 2011 and 2020 in Romania, Germany, and Italy. The perpetrator used the "loverboy" method, exploiting the victims' financial vulnerability and lack of education, and maintained control through violence, threats, debt, and restriction of movement.

Victims were trafficked internally and across borders via Hungary and Austria. They were identified by law enforcement during a broader criminal investigation and formally recognised as trafficking victims. Victim identification was hindered because the defendant used pimping activities to conceal the trafficking and exploitation of the child and two other victims. All were referred through the National Referral Mechanism and received psychosocial and social support, including child-protection services for the minor.

In May 2025, the trafficker was convicted and sentenced to over seven years' imprisonment, with additional civil rights restrictions, and ordered to pay €25,000 in moral damages to each victim.

The case highlights effective victim referral and compensation, but also the difficulty of identifying child trafficking when exploitation is concealed under pimping offences.

In **Greece**, the sexual exploitation rate among both national and migrant children is relatively low, with exploitation for forced begging and labour exploitation constituting the predominant forms.

In **Italy**, risks are concentrated among unaccompanied migrant children arriving through Mediterranean routes – including children from the SWANA region (South West Asia and North Africa), and Sub-Saharan Africa – who face sexual exploitation during transit or after arrival. In **Belgium**, sexual exploitation remains one of the most consistently identified forms of child trafficking, though the profiles of affected minors shift over time. While Nigerian and Vietnamese minors were particularly visible in sexual and labour exploitation cases in 2018–2019, more recent patterns point to Belgian girls (in both Flanders and Wallonia) and Afghan boys (mainly in Flanders). **Poland** reports persistent sexual exploitation of both Polish and foreign children (including Roma children), while **Portugal** – though identifying fewer sexual-exploitation cases – nonetheless documents several instances, including those linked to adoption-related trafficking.

Another development across several countries is the **escalation of online sexual exploitation**. **Romania** reports a significant rise in online grooming and child pornography cases, a trend echoed in **Poland**, where 26% of adolescents report online sexual abuse experiences and digital blackmail is increasingly used as coercion. **Bulgaria** notes growing online recruitment through social media and encrypted apps. In **Belgium** the sex industry has moved online, especially after the COVID-19 pandemic. A connection can also be identified between online grooming and cases of missing children. In these cases the child is persuaded or manipulated by the groomer to leave home, often under the false belief that they are entering a trusting or romantic relationship. In **Finland**, there has been an increasing number of cases where children have been led into sexual exploitation through psychological control and manipulation online. In all countries, the COVID-19 pandemic intensified this shift as physical mobility restrictions pushed traffickers to digital spaces.

Labour exploitation appears in all eight countries, though with varying levels of visibility.

Poland shows a structural rise in labour trafficking overall, with children appearing in agriculture, construction, domestic work, and petty forced labour. Migrant children from Ukraine, Belarus, Romania, Vietnam and the Phillipines are particularly affected. **Portugal** similarly identifies labour exploitation as one of its key forms, especially among foreign children from Africa, Latin America and South Asia who arrive with false documents or through irregular channels. **Italy** records exploitation of migrant children in agriculture, hospitality and informal economies, often facilitated by organised networks.

Finland and **Belgium** have fewer documented cases of child labour exploitation. In **Finland**, some children face risks related to domestic servitude or exploitation in the family business. Moreover, young jobseeking refugees and asylum seekers may be targeted by unscrupulous employers. In **Belgium** the low number of cases may reflect difficul ties or changes in detection rather than actual incidence. Children are found in sectors such as domestic work, beauty, cleaning, and hospitality, sometimes working informally to contribute to their stay or repay debts. Labor inspectors note that exploiters are increasingly adapting their practices to avoid detection, making cases more complex to detect and identify.

Bulgaria and **Romania** report increasing cases of labour exploitation. **Romania** notes children working in shepherd camps, while **Bulgaria** highlights teenage boys especially vulnerable to coercion into exploitative labour in sectors such as agriculture, construction, and low-wage manufacturing.

In **Greece** labour exploitation of children showed increased rates during 2024, although exploitation for forced begging remains, as in previous years, the most frequently reported form.

Across the reports, **labour exploitation tends to be underidentified**, particularly where systems lack standardised screening (**Portugal, Poland**), rely heavily on law enforcement for formal identification (**Portugal**), or face limited access to rural sites (**Bulgaria, Romania**).

Poland – Exploitation for Forced Begging Case (2024)

Two children, aged 12 and 14, were trafficked internally by their father to beg in Tarnów between April and November 2023. Exploitation relied on parental authority, with the children's earnings confiscated and used for alchohol.

Judicial intervention led to the children's removal and a criminal investigation. Prosecutors charged the father with human trafficking under Polish law, recognising forced begging as a form of trafficking despite no cross-border movement. In November 2024, the Tarnów District Court convicted him, sentencing him to slightly over one year – a penalty widely seen as lenient.

The case underscores the challenges of identifying child trafficking within families, the risk of forced begging being treated as a minor offence, and the need for stronger recognition and proportionate sentencing for internal child trafficking.

Exploitation for forced begging is particularly documented in **Bulgaria, Romania, Poland, Greece, and Portugal**. Cases involving forced begging often occur within the family unit, with parents or close relatives directly exploiting children. In **Bulgaria**, organised groups exploit Roma children for begging and petty criminal activities across Western European cities – a pattern that has persisted for decades. **Romania** highlights forced begging as one of the most underdetected forms of exploitation, with infants often used. In **Poland**, ethnic minorities and especially Roma children are trafficked for begging. **Greek** NGO teams in Athens and Thessaloniki reported high and seasonally shifting visibility of child begging, particularly in tourist areas. Differences were noted in exploiters' behaviour, with actors appearing to operate with greater ease in Athens, potentially reflecting a lower perceived level of risk. The presence of child-begging groups was linked to ease of cross-border movement and seasonal relocation. **Portugal** also reports a substantial number of boys that have been trafficked for labour and organised begging. These forms of exploitation are most prevalent where children are embedded in informal economies, socially excluded communities, or family units in which such practices are normalized. In **Belgium**, forced begging appears less frequently in statistics, largely because these victims often belong to highly nomadic communities and disappear quickly, rarely reaching the stage where they can be formally identified as victims.

Exploitation for criminal activities most commonly involves theft, shoplifting and pickpocketing. In **Belgium**, victim support centres identify criminal exploitation as one of the main forms of child exploitation, yet law enforcement notes that cases often surface only during investigations, with many likely remaining undetected; at the same time, victims are becoming younger, particularly among minors linked to Maghreb-origin[3] street gangs. **Greece** reports children used in petty criminality (e.g., theft, street-level offences) or more serious crimes (e.g. drug trafficking, smuggling), infrequently recognised in time as trafficking exploitation. In **Finland**, forced criminality among minors mainly involves drug offences, theft, and extortion, often driven by intimidation, blackmail, or debt repayment, with children under 15 deliberately targeted due to their lack of criminal liability. **Finland** perceives children on the run from foster care as at-risk for sexual exploitation as well as exploitation in criminal activity, perpetrated in exchange for money or accommodation. Young people struggling with substance abuse are also sometimes pressured or forced into criminal activities to repay debts incurred through drug use. In some areas of Italy, unaccompanied foreign boys are recruited into drug distribution. In **Romania** coercion into criminal activities is noted as an emerging form, tightly related to begging. In **Poland** cases of children used for petty crime or benefit fraud point to evolving exploitation methods.

Such exploitation typically occurs in contexts where children are already exposed to criminal norms, social marginalisation, or sustained pressure from their immediate environment.

Bulgaria – Illegal Adoption / Sale of a Child (2019)

This case concerns the trafficking of a newborn child from Bulgaria to Greece for the purpose of illegal adoption. The offence was committed in 2010 but prosecuted only in 2019, revealing serious delays in investigation and justice.

The victim, a mother of three living in extreme poverty and social vulnerability, was deceived by the perpetrator into agreeing to give birth in Greece and relinquish her child in exchange for €4,500 – a payment that was never intended. The case involved cross-

3 The Maghreb refers to Morocco, Algeria, Libya, and Mauritania.

border trafficking but the judgment provides no information on victim identification, referral, or support.

The perpetrator was convicted and ultimately sentenced to five years' imprisonment and a fine of 40,000 BGN (approx. € 20 000).

The prolonged time lapse between the crime and conviction highlights persistent weaknesses in early detection, victim protection, and timely prosecution in cases of child trafficking for illegal adoption.

Though less prevalent than sexual or labour exploitation, **exploitation for illegal adoption and sale of infants** constitutes one of the most complex typologies. **Bulgaria** presents the clearest pattern: the sale of newborn babies by vulnerable pregnant women has been a known form of trafficking for years. **Greece**'s reports, as the usual destination-country, confirm this, by referring to trafficking linked to illicit adoption and surrogacy-like arrangements involving vulnerable pregnant women, mainly of foreign origin. These cases often exploit gaps in family law, lack of oversight in birth registration, and the presence of international demand. Although traditional cross-border schemes have declined – partly due to network disruption and EU mobility changes – Bulgarian stakeholders describe a shift in modus operandi: instead of transporting pregnant women abroad, buyers now travel to Bulgaria, where falsified parentage and hospital-based collusion are used to transfer infants directly. **Portugal** and **Romania** also document illegal adoption cases, though less systematically. In **Portugal**, illegal adoption appears intermittently in official statistics; in **Romania**, young mothers from vulnerable backgrounds are pressured into handing over infants under deceptive or exploitative conditions. This typology is deeply intertwined with extreme poverty, gendered vulnerability, and organised criminal facilitation.

Finland – Child Trafficking for Forced Marriage (2025)

The case concerns an Iraqi girl who was forced into marriage at the age of 13 by an older male relative. The marriage took place in Greece in 2008, after which the perpetrator brought the victim to Finland using forged documents. Over a decade, the victim was subjected to violence, threats, and severe control, while living in conditions of dependency due to her age, migration status, lack of language skills, and absence of financial resources.

The case came to light only in 2018, when the victim self-reported after divorcing the perpetrator and reporting the abduction of their children to Iraq.

Finnish authorities issued an European arrest warrant, leading to the suspect's arrest in Greece in 2024. The Southwest Finland District Court convicted him of aggravated human trafficking, forcing a child into marriage, child abduction, and aggravated deprivation of liberty, sentencing him to six and a half years' imprisonment (verdict not final).

The case highlights the difficulty of early identification in forced marriage situations, especially where family members are complicit, as well as the challenges of collecting cross-border evidence. It also illustrates how trafficking for forced marriage is often intertwined with other serious crimes and why such cases remain significantly underreported.

Forced marriage appears in a limited number of country reports. It is addressed most clearly in the **Finnish** report, as it is the second most commonly detected form of trafficking in the country. The phenomenon is linked to cases of girls with a migrant background being sent abroad to marry, marriages concluded outside **Finland** with exploitation occurring after arrival, and situations where adult men arrange marriages with a young spouse either abroad or in Finland. These cases are often preceded by honour-related violence or pressure within extended family or community structures, with marriage functioning as a mechanism of exploitation and, in some instances, as a pathway to residence through family reunification. Comparable dynamics are also noted among Finnish nationals, particularly within closed religious communities. The **Bulgarian** report refers to forced marriage as a typical exploitative practice within certain Roma communities, while **Greece** reports some cases from 2024 involving child victims whose marriages occurred prior to entry into the country. Across all contexts, forced marriage remains a particularly difficult form of trafficking to identify, as exploitation is embedded in familial, cultural, or migratory arrangements rather than overt criminal settings.

Emerging Trends

New technologies have shifted child-trafficking from primarily visible, face-to-face recruitment toward digitally mediated, hybrid models across the partnership: initial contact increasingly happens on social media, messaging apps or gaming platforms (reports from **Greece, Poland, Portugal, Belgium, Italy** and **Finland** document recruiters increasingly using platforms and encrypted apps to groom and recruit children). This has produced two clear operational effects reported by practitioners: (1) recruitment and grooming at scale and at distance (false identities, romantic manipulation, false job ads), cited in **Poland, Greece, Portugal, Belgium** and **Italy**; and (2) online sexual exploitation and the rapid circulation of child sexual abuse materials, explicitly noted in **Belgium, Italy, Romania** and **Poland**.

Belgium – Liège, Arlon, and Brussels Sexual Exploitation Case (2022)

Four teenage girls, three under 16, were sexually exploited by a network of male and female perpetrators who recruited them via online grooming (via Snapchat) and street encounters. Victims were coerced into prostitution through violence, threats, financial control, and relocation, with earnings appropriated by the exploiters.

The case was identified in January 2020 following a client report to Child Focus. In 2021, the Liège Criminal Court convicted three male defendants, imposing prison sentences of three to seven years, while a female defendant was acquitted under the non-punishment principle due to her subordination to a male groomer. On appeal in 2022, one sentence was increased to ten years.

The case highlights the role of trauma bonds, adverse childhood experiences, early detection through vigilance, and the practical application of the non-punishment principle in child trafficking cases.

The use of encrypted or anonymous platforms and closed groups complicates detection and cross-border investigation (flagged in **Poland** and **Greece**), while frontline actors across countries report that children's limited digital risk literacy magnifies their susceptibility to grooming and image-based coercion (reported in **Greece, Italy, Romania** and **Finland**).

Several partner reports also underline how technology has changed traffickers' control strategies: **digital blackmail**[4] **and remote coercion** (requests to produce images or livestreamed material, then threats to share them) are repeatedly mentioned in **Poland, Italy, Belgium, Finland** and **Romania** as a growing control mechanism that keeps victims compliant without physical confinement. Furthermore, organised criminal groups use social media platforms and messaging apps to recruit young people into drug trafficking, cyber-attacks, online fraud, and violence-as-a-service, for example.

At the same time, technology enables faster, lower-cost cross-border coordination of networks (noted in **Portugal** and **Poland**) and allows exploiters to manage mobility and exploitation logistics while leaving fewer physical traces.

Finally, partner reports converge on institutional consequences: law-enforcement and child-protection actors frequently say their investigative and data-sharing capacity lags behind traffickers' digital methods (**Greece, Poland**); they call for interoperable digital evidence access, improved digital forensics, AI-assisted tools, and prevention through digital literacy for children and caregivers (recommendations appear across **Poland, Greece, Finland** and **Portugal**).

2. Trafficking Routes and Mobility

A pattern cutting across all eight reports is the coexistence of **transnational mobility and internal trafficking**, with their relative prominence varying by country.

Belgium is both a destination and a transit country, with the latter referring to children seeking to continue their migration route to the UK. Internal trafficking also takes place, with girls in Flanders and Wallonia being increasingly affected and sexual exploitation being the most common form. **Bulgaria** emerges primarily as origin country (Bulgaria's girls trafficked to Germany, Austria and the Netherlands), but reports increasing internal trafficking – particularly for sexual exploitation – often linked to domestic criminal networks exploiting poverty. The COVID-19 pandemic accelerated this shift in Bulgaria as cross-border movement declined. There is growing recognition that Bulgaria is increasingly becoming a destination country for trafficked persons. Particularly vulnerable are migrant workers from third countries, whose numbers have risen in response to labour shortages, as well as Ukrainian women and children who have fled the war.

Finland reports that children with migrant or refugee backgrounds may be trafficked for purposes of sexual or labour exploitation during transit to Finland, and cases of forced marriage often involve girls sent abroad, married abroad but exploited in Finland, or married in Finland to spouses from their home country. Among Finnish children, those who abscond from care institutions are particularly vulnerable to multiple forms of exploitation, and forced marriages can also occur within closed or religious communities.

In 2024, **Greece** reported that unaccompanied child victims were most frequently exploited in their country of origin, followed by Türkiye. There is also a growing trend of domestic exploitation, particularly labour exploitation and forced begging.

4 The Finnish police has raised concern over online networks of predators (such as The Com) who exploit children through tactics of extremely violent blackmail.

In **Italy**, the line between migrant smuggling and child trafficking is often blurred, as facilitation of irregular migration can turn into exploitation when children are coerced or forced to repay journey debts. In Sicily, trafficking is closely linked to mixed migration flows and transnational smuggling networks, with the island serving as a key arrival point for unaccompanied children from North Africa, particularly Tunisia and Libya. Authorities report that many children arrive with pre-existing contacts and instructions, suggesting coordination by organised criminal networks for onward movement across Europe.

Historically, Polish children were trafficked abroad, mainly to Western and Northern Europe for sexual exploitation. In recent years, outbound trafficking has declined, while foreign children – primarily from Ukraine, Romania, and Bulgaria – are increasingly trafficked into Poland for sexual exploitation, forced labour, or begging. The war in Ukraine has sharply increased the number of at-risk children in Poland. Since 2022, over 1.5 million Ukrainian child refugees, many unaccompanied or separated from families, face heightened risks of trafficking and online exploitation due to displacement, lack of supervision, and language barriers.

Portugal is primarily a transit and destination country, with its role varying by year, and less frequently a country of origin. Most child victims identified have been from the EU (Romania, Bulgaria), followed by Africa (Angola and Nigeria) and Latin America (especially Brazil). Migration status is a key factor in vulnerability, particularly for children from culturally and linguistically connected countries such as Brazil, whose proximity to Portugal can facilitate migration but also make it easier for traffickers to exploit them with false promises. Domestic cases also exist, with a minority of victims being Portuguese children.

Romania remains predominantly an origin country for victims of human trafficking with children from Roma communities, children in institutional care and children in street situations are particularly vulnerable to human trafficking.

3. Actors and Organisational Models

Across the partner countries, the reports portray a spectrum of trafficking actors ranging from loosely structured individual exploiters to highly organised criminal networks, with many cases falling somewhere in between.

Several countries document familial trafficking[5] as a persistent pattern: **Belgium** and **Bulgaria** report intergenerational trafficking within Roma communities, where relatives recruit or directly exploit children for sexual exploitation, forced begging, domestic work or petty crime. **Greece, Romania** and **Poland** mention similar dynamics in cases of forced begging and domestic exploitation; and **Italy** describes family-linked recruitment in some forms of exploitation within migrant communities. In the **Finnish** context, victims tend to be exploited by their boyfriend, by a person posing as a trustworthy adult, or by their group of friends. Oftentimes, the victims do not realize that they are being seriously exploited, because the perpetrator is someone they trust.

Across countries, exploitation often emerges within trusted or familiar relationships, including family members, intimate partners, peers, or social networks. In such contexts, children's exposure to risky

5 Familial trafficking occurs when a family member or a guardian facilitates the trafficking (for more details see: U.S. Department of Justice. Office of Community Oriented Policing Services. 2024. No One Can Hurt You Like Family: What We Know About Familial Trafficking Identification and Response)

behaviours may develop gradually as part of their everyday environment, normalising those risky behaviours and delaying recognition of exploitation when it occurs.

Organised networks, when present, differ in structure and operational sophistication. **Bulgaria**'s reports describe networks that facilitate sexual exploitation across Germany, Austria and the Netherlands. **Romania** reports networks behind sexual exploitation, child pornography production, and forced begging, often operating both domestically and transnationally. **Poland**'s stakeholders highlight hybrid models: small groups coordinating forced labour or sexual exploitation, especially of migrant children, and, as in **Finland**, increasingly tech-enabled networks using online grooming and encrypted communication.

In **Italy**, trafficking is closely intertwined with **migration flows**. The actors range from smugglers who transition into exploitative control to criminal groups embedded along transit corridors; **Italy** additionally notes exploitation systems tied to agriculture, hospitality and informal labour markets. **Portugal**, although identifying fewer large networks, reports cases involving football academies, informal labor recruitment, and exploitative practices targeting minors, particularly migrant children.

Across all countries, a shared pattern emerges: trafficking of children rarely depends on large, hierarchical organized criminal groups, but rather on flexible clusters of individuals–relatives, acquaintances, local recruiters, intermediaries, exploiters, and online facilitators–whose coordination varies depending on the form of exploitation. This organisational adaptability makes child trafficking especially difficult to detect, as many actors appear "ordinary," embedded in families, communities, or everyday economic sectors.

4. Victim Profiles and Vulnerabilities

Across the eight partner countries, child trafficking emerges as a layered system of overlapping vulnerabilities that reproduce themselves in strikingly similar ways despite major differences in geography, welfare systems and migration pressures. Three structural dimensions cut across all contexts: gendered exploitation, migration-driven vulnerability and socio-economic fragility. The interplay of these dimensions shapes who becomes a victim, how traffickers recruit, and which children remain invisible to protection systems.

A clear gendered pattern runs through all countries. In **Bulgaria, Romania, Italy, Greece** and **Belgium**, adolescent girls are overwhelmingly represented in cases of sexual exploitation, whether in apartments, brothels, escort networks or online pornography. **Romania** provides the starkest data-backed example: in recent years, girls aged 13–17 constitute the dominant category of minor victims, especially in sexual exploitation and online grooming, a trend mirrored in **Bulgaria**. **Italy** and **Greece** report similar dynamics among girls, with exploitation often emerging in informal economies where girls are groomed through romantic manipulation, grooming tactics, or coercion masked as protection. While boys appear in sexual exploitation in several countries (notably **Belgium, Romania** and **Poland**), they are far more consistently found in labour exploitation, forced criminality and begging. **Bulgaria** notes boys in agricultural and construction labour, as well as pickpocketing and petty crime driven by organised criminal groups. **Portugal** and **Romania** also report boys in labour and criminal exploitation, while **Finland** highlights the phenomenon of forced marriage, which affects all genders, but particularly girls. Even in countries where quantitative data are sparse, the gendered division of exploitation types is present as a structural norm.

Migration pressure constitutes the second major axis of vulnerability, shaping victim profiles in **Greece, Italy, Belgium, Poland, Finland** and **Portugal**. In **Greece**, unaccompanied children are considered as a high risk group for recruitment in trafficking, aiming at exploitation of various forms, mainly labour and criminal exploitation. **Italy** reports vulnerabilities within the reception system, such as disappearances and suspected cases of internal exploitation of unaccompanied minors, sometimes linked to corruption or organized criminal networks.

Belgium identifies unaccompanied children from both EU and third countries, each with distinct profiles. Children of Maghreb origin, often living on the streets and moving across Europe, avoid applying for international protection and escape the guardianship system. Afghan boys, victims of the Bacha Bāzī practice, may be smuggled to **Belgium**, subjected to sexual violence, and coerced into continued abuse, yet face significant barriers to disclosure due to stigma. Other profiles include young Vietnamese children repaying smuggling debts, Nigerian girls already drawn into trafficking networks, and South-East European girls lured by false job offers or forced into marriage and prostitution, with some victims involved in forced criminality. Very young Roma children are also affected, exploited in theft, robbery, forced begging, or domestic work.

The Ukrainian displacement crisis dramatically reshaped **Poland**'s vulnerability landscape: over a million child refugees entered the country, many unaccompanied or living in informal accommodation, and became exposed to labour exploitation, online grooming and sexual abuse. **Portugal**'s profile differs: while it is not a frontline arrival state, most identified child victims are foreign children originating from African and Latin American countries, some brought with falsified documents and moved onward to other EU states. In all these settings, migration status intersects with lack of documentation, language barriers, and weak guardianship to produce a uniquely acute form of vulnerability.

Poverty, social exclusion and structural marginalisation form the third major pattern, and in some countries they are the primary drivers of child trafficking. **Bulgaria** and **Romania** present the clearest cases: children from rural, economically deprived areas–with limited educational opportunities and often unstable or abusive family environments–are disproportionately targeted. In **Bulgaria**, the intersection of poverty and ethnic marginalisation is particularly severe among Roma communities, where intergenerational trafficking occurs within family structures that normalise child labour, early marriage, or petty criminality as economic survival strategies. **Romania** identifies similar vulnerabilities: children in rural areas, those experiencing school dropout, or those growing up without emotional support (including children with parents working abroad) are repeatedly cited by practitioners as at the highest risk. The same structural pattern appears, though less sharply, in **Portugal**, where socio-economic hardship in origin communities and limited education play a central role. **Poland** note that children from dysfunctional or impoverished families, or those cared for by relatives due to labour migration, lack consistent protection and become easy targets for grooming–often online. Even **Finland**, despite its stronger social systems, identifies e.g. migrant children, children on the run from foster care, children of trafficking victims and children suffering from behavioural or psychological challenges as structurally disadvantaged and therefore more easily exploited. In **Belgium** trafficking victims are often already known to the youth justice system, often as children who run away or previously under supervision due to child protection concerns.

In sum, the profiles of trafficked children across the partner countries reveal a coherent and deeply structural pattern: *girls are predominantly sexually exploited; boys more often exploited in labour and criminal markets; migrant and displaced children occupy the highest-risk spaces; poverty and marginalisation shape recruitment; and institutional gaps determine which vulnerable children ultimately fall through the cracks*.

These structural vulnerabilities are compounded by specific psychological and relational dynamics that increase the risk of prolonged exploitation and re-trafficking. A 2024 Bulgarian study highlighted that trafficking victims (in general) can adapt to prolonged, low-intensity exploitation, resisting only when abuse escalates severely. Their relationships with traffickers are dominated by fear and dependency, often accompanied by irrational feelings of obligation, gratitude, or belonging, a perceived lack of alternatives, distrust, and prior negative experiences with support services. This combination creates an immediate and high risk of repeated revictimisation. Ensuring long-term support, consistent reintegration follow-up, and access to tailored services is therefore essential not only to stabilize victims after initial assistance, but also to break cycles of exploitation and reduce the risk of re-trafficking.

5. Specific Comparative Note: Greece, Italy, and Portugal as Migration-Linked Trafficking Contexts

Across the three partner countries most shaped by migration from third countries dynamics – **Greece, Italy, and Portugal** – child trafficking is closely intertwined with patterns of mixed migration flows, border pressures, and fragmented reception systems. While each country sits in a different part of Europe's migration geography, all three reports show how child trafficking emerges at the intersection of mobility, legal precarity, and institutional overload.

Greece's report depicts a context where border crossings, asylum procedures, and large-scale reception structures may compound existing vulnerabilities and contribute to the emergence of new ones. Many child victims are unaccompanied or separated children who arrive through irregular migration routes. Their stay in reception facilities, combined with legal uncertainty increases the risk of their exposure to sexual and labour exploitation, as well as exploitation in criminal activities.

Italy's experience is similarly shaped by migration flows, reflecting its geographical position in the central Mediterranean as a strategic landing point. Child trafficking risks are concentrated among unaccompanied migrant children from the SWANA region, Sub-Saharan Africa and South Asia, many of whom disappear shortly after arrival or during transfers between reception facilities. The report highlights exploitation in sexual markets, labour markets, and forced criminality, particularly affecting children who are outside stable guardianship or formal schooling. Italian authorities face persistent challenges in preventing disappearances from reception centres - a recurring vulnerability noted also in **Greece**, but especially acute in **Italy** due to the scale of arrivals. Exploitation emerges from broader smuggling-to-exploitation pipelines, weak monitoring during transfers, and uneven capacity of local services, especially in the south.

Italy – Nigerian Minor Victim of Sexual Trafficking (2019)

This case concerns the trafficking of a 16-year-old Nigerian girl for sexual exploitation in Italy. Recruited in Benin City by a family acquaintance under the false promise of domestic work in Europe, the victim was subjected to severe abuse during transit through Niger and Libya, including detention and violence. Upon arrival in Italy, she was placed in a reception centre but subsequently escaped and was re-trafficked to Turin, where she was exploited in street-based prostitution. Control was exercised through a combination of debt bondage (€35,000), threats to her family, and coercive juju rituals.

The victim was identified following a police raid in Turin and referred to an NGO, which facilitated her formal recognition as a trafficking victim. She received shelter, legal aid, and psychological support through the national anti-trafficking programme. Five traffickers were arrested and convicted, receiving sentences ranging from 8 to 14 years' imprisonment. The victim later returned voluntarily to Nigeria through an IOM-supported reintegration programme.

The case illustrates the high vulnerability of unaccompanied migrant girls, particularly when reception systems fail to ensure continuity of protection, enabling re-trafficking after initial arrival. It underscores the central role of NGOs in victim identification and trust-building, especially where victims are reluctant to engage with authorities due to fear, trauma, or spiritual coercion. At the same time, the case highlights persistent structural risks in migration and reception pathways that traffickers continue to exploit.

Portugal presents a distinct migration-linked profile: while not a frontline entry point like **Greece** and **Italy**, it consistently identifies foreign children (from Africa, Latin America, and Eastern Europe) as the majority of child victims. Many arrive with families, extended relatives, or intermediaries, and are later exploited in labour and sexual exploitation, forced begging, criminal activity, or, in certain years, illegal adoption cases. Unlike **Greece** or **Italy**, **Portugal**'s trafficking challenges stem not from mass influxes but from steady and diverse immigration flows, combined with administrative vulnerabilities (e.g., formal identification restricted to law enforcement authorities, limiting frontline recognition and timely victim identification; long delays in regularisation, lack of disaggregated data, insufficient training in reception centres). The report notes that officials have repeatedly failed to identify victims among asylum-seeking children for several consecutive years — a sign of systemic under-detection rather than absence of risk. **Portugal**, therefore illustrates a different model: lower-volume but chronic under-identification, with vulnerabilities concentrated among undocumented children, migrant boys in labour sectors, and children travelling with falsified documents.

Legal and Institutional Frameworks: Common Threads

1. Belgium

Policy & Legal Framework

Belgium's anti-trafficking policy is coordinated at federal level through a multidisciplinary institutional framework overseen by the Interdepartmental Coordination Unit for Combating Human

Trafficking and Smuggling (ICU). Operating under the authority of the Minister of Justice, it brings together all relevant federal actors and is responsible for steering policy development, ensuring coherence across sectors, and monitoring implementation, with analytical support provided by Myria. In practice, this structure already fulfils several core functions of a national anti-trafficking coordinator, as required under Directive 2024/1712/EU, although its full alignment with the Directive's final implementation requirements remains to be assessed.

Belgium's operational anti-trafficking model is built on a multidisciplinary approach involving law enforcement, immigration authorities, judicial bodies, and specialised victim support services.

Strategic priorities within this institutional framework are set out in successive five-year National Action Plans (NAPs). The 2021–2025 NAP builds on international guidance, including the 2018 assessments and recommendations of GRETA and Myria. It places particular emphasis on strengthening and diversifying training on child trafficking for frontline professionals, magistrates, guardians, and youth care services. Additional measures include the development of child-friendly informational tools and enhanced awareness-raising on child trafficking within the education sector.

Criminal-Law Dimension

Trafficking is criminalised, covering sexual exploitation, labour exploitation, forced criminality, forced begging, and the illegal removal of organs. Forced marriage and illegal adoption will be criminalised under the new Criminal Code, entering into force on 8 April 2026, while a draft law expected in 2026 is likely to address surrogacy exploitation. Any offence involving a child automatically qualifies as aggravated. Article 18a of Directive 2024/1712/EU introduces an obligation for member states to criminalize the use of services when knowingly provided by victims of human trafficking. This requirement is not yet reflected in the (new) Belgian criminal code. While the new Criminal Code contains provisions addressing the use of information and communication technologies, it does not explicitly recognise the use of information and communication technologies as an aggravating circumstance specifically in relation to the offence of trafficking. It remains unclear whether Belgian legislation fully complies with Article 4 of Directive 2024/1712/EU in this respect. The issue is expected to be addressed in the draft transposition proposal currently being prepared by the Ministry of Justice.

Institutional Landscape

Belgian report notes a degree of specialisation within law enforcement, with local police units focusing on areas such as minors, disappearances, and human trafficking, though coverage is uneven, particularly in smaller towns. At the federal level, the Federal Judicial Police support investigations into organised crime, with children treated as a priority, but capacity constraints–especially in addressing rapidly evolving online environments–remain a key challenge.

The social security agency (RSZ/ONSS) contributes to identifying trafficking through inspections and fraud detection, supported by specialised ECOSOC teams working on labour exploitation. Despite recent staffing increases, identifying minor victims remains difficult, as they are often undocumented and exploited in informal or private settings, such as domestic work.

Judicial handling of trafficking is also specialised. All judicial districts have reference prosecutors specialised in human trafficking and minors. Close coordination between judicial authorities, law enfocement, specialised shelters, guardians, and other child protection services support victim-sensitive investigations and more coherent case-building involving child victims.

Unique Features

Belgium's system is highly institutionalized and formally specialised, however, Belgian actors face challenges in detecting child victims of trafficking. Existing guidance and training for judicial authorities and frontline professionals are often sporadic and rarely tailored to minors, while high workloads limit participation. The subtle and hidden nature of trafficking further complicates identification, and cases of exploitation are not always officially recognised as trafficking, likely underestimating the true extent of child trafficking in Belgium. These challenges are compounded by the absence of a centralised data system: although such a system was once planned, elements such as privacy concerns, funding constraints, and issues with data quality and compatibility have prevented the integration of separate datasets.

2. Bulgaria

Policy & Legal Framework

Bulgaria's anti-trafficking system is coordinated by the National Commission for Combating Trafficking in Human Beings (NCCTHB), the central policy body under the Combating Trafficking in Human Beings Act, chaired by the Deputy Prime Minister. The Commission brings together deputy ministers, senior representatives of key security, child protection, and judicial institutions, and is supported by an administrative secretariat. It develops and oversees national anti-trafficking programmes, coordinates prevention, protection, training, research, and international cooperation, and supervises Local Commissions established at municipal level. These Local Commissions adapt national policies to local contexts and ensure inter-institutional coordination among public authorities and civil society.

In cooperation with the Animus Association Foundation and LaStrada International, the National Commission has established the National Mechanism for Referral and Support of Trafficked Persons in Bulgaria, which provides the formal framework for inter-institutional coordination in the identification, protection, and support of trafficking victims (including child specific standard operating procedures). The Mechanism sets out procedures for case coordination, victim identification, risk and needs assessment, and the delivery of protection, assistance, and reintegration measures. The best interests and well-being of the child underpin its operation, and once a child victim is identified, both the State Agency for Child Protection and the Ministry of the Interior must be notified within 24 hours.

Criminal-Law Dimension

Criminal law covers all major forms of human trafficking – sexual exploitation, labour exploitation, forced begging, organ removal, placing in forced submission (enslavement) and sale of infants. Exploitation involving children triggers enhanced penalties. The report highlights one unique feature: the longstanding issue of newborn-sale networks, now evolving into more covert forms involving manipulation of birth registration rather than cross-border transfer of pregnant women.

Bulgaria is expected to continue aligning its legal and institutional framework with European standards by transposing Directive 2024/1712 and to follow up on recommendations from GRETA, including in areas such as the use of technology to protect vulnerable victims and witnesses through expanded use of video testimony and the development of more child-friendly procedures. GRETA's fourth evaluation report notes that, although Bulgarian law permits the use of video testimony and

other technological measures for vulnerable witnesses (including children), these options remain under-utilised in practice and should be implemented more consistently to reduce trauma and enhance protection.

Institutional Landscape

Child-specific standard coordination procedures are led by the State Agency for Child Protection, which also operates the Coordination Mechanism for unaccompanied and trafficked children returning from abroad. This mechanism covers repatriation, reception, risk assessment, placement decisions, and reintegration follow-up for up to one year.

Law enforcement plays a central operational role through the Ministry of Interior, notably the Directorate General for Combating Organised Crime, the Migration Directorate, and the Border Police, which are responsible for investigation, victim identification, risk assessment, referrals, and international cooperation. The Ministry of Foreign Affairs supports Bulgarian victims abroad, while social reintegration is coordinated by the Ministry of Labour and Social Policy. Health care, education, asylum procedures, and national security aspects are addressed respectively by the Ministry of Health, the Ministry of Education and Science, the State Agency for Refugees, and the State Agency for National Security.

Judicial action is led by the Prosecutor's Office, which oversees investigations and prosecutions, with cases heard at regional courts and jurisprudence harmonised by the Supreme Court of Cassation. Victims' access to justice is supported through the National Legal Aid Bureau.

Unique Features

Overall, **Bulgaria** has a comprehensive legal and institutional framework, but across interviews and focus groups, stakeholders consistently identified training and capacity-building as a major systemic weakness. While pockets of strong expertise and informal professional networks exist, they remain uneven. Respondents stressed the need for continuous, structured training across all sectors–particularly on child trafficking, prevention and identification, and the growing role of technology in trafficking-related crimes–to ensure a more consistent and effective institutional response.

3. Finland

Policy & Legal Framework

Finland's anti-trafficking system operates within a rights-based, child-protection-centred legal framework that criminalises all forms of trafficking and incorporates strong procedural safeguards for children. The work against human trafficking is coordinated by a National Anti-Trafficking Coordinator and monitored by the Independent National Rapporteur on Trafficking in Human Beings. Finnish legislation reflects a broad definition of trafficking and recognises child victims regardless of the means used, which aligns well with EU standards. The legal system places particular emphasis on the best interests of the child, non-punitive approaches, and access to support services even before formal identification. Policies ensure that access to assistance is decoupled from criminal proceedings – a unique distinguishing feature in comparison with the other partner countries. The system prioritises early identification and equality of access to protection, especially for migrant and asylum-seeking children.

Criminal-Law Dimension

Finnish criminal law criminalises all major forms of exploitation, including sexual exploitation labour exploitation and forced marriage, and provides specific safeguards for children by requiring that criminal cases involving children – including trafficking – be processed urgently.

The April 2025 amendment to the Criminal Code introduced the following grounds for increasing the severity of the punishment for a crime: involvement in street-gang activity, inciting children under 15 to commit offences, and the use of humiliation. The reform explicitly characterises the incitement of a child to commit a crime as a form of exploitation, recognising how offenders use children to avoid criminal liability or exert control. The Government Proposal further notes that where pressure or coercion is present, such behaviour may also qualify as coercion under Finnish law. However, the report highlights that potential intersections between such conduct and trafficking are not examined, leaving a grey area where highly exploitative criminal involvement of children is not analytically linked to trafficking frameworks.

Institutional Landscape

Finland's institutional landscape is centralised in coordination but decentralised in practice, with responsibilities shared between national authorities and regional child-protection and social-welfare units. The National Assistance System for Victims of Trafficking functions as the core mechanism for victim support and plays a significant role in identifying children through referrals from multiple sectors. It coordinates victim assistance to trafficked persons and their children in the whole country and is responsible for helping victims who do not have a municipality of residence in Finland (e.g. undocumented migrants, asylum seekers). The regional well-being counties are responsible for the provision of assistance to victims who have a municipality residence. There is however variability in training, awareness, and operational capacity across well-being service counties. The role of NGOs in the identification and support of victims is important, especially when the child does not want to disclose their experiences to the authorities.

Police and prosecutorial authorities handle trafficking cases within broader investigative units, and while **Finland** has expertise in organised crime, trafficking-specific specialisation is not as developed as in some partner countries. Nevertheless, there are, e.g., specialised units focusing on crimes involving children as well as a national trafficking unit within the Police responsible for investigating large-scale cases and cases requiring special expertise. It has been noted that the dismissal rate of child trafficking cases in court, especially of those not related to sexual exploitation, has been quite high.

Unique Features

The Finnish report identifies several characteristics that distinguish **Finland**'s system:

- Assistance by the National Assistance System is available for all presumed victims, whether they wish to take part in the criminal process or not. This is likely to lower the threshold of initial contact and disclosure, and services can be provided irrespective of the investigative status of the case.

- The Finnish trafficking legislation contains a broad definition of forced marriage, which includes situations where after initial consent to marry, a person is prevented from leaving

said marriage due to threat of honour-based violence. It also covers other than legally binding marriages, such as so-called religious unions.

- Challenges in practical identification, with frontline workers often lacking confidence in recognising trafficking indicators or activating national mechanisms resulting in situations where victims seek assistance only after they turn 18.

- A system where children may come to attention primarily through child-protection pathways, making social-welfare services central to detection — more so than labour inspection or police-led detection models seen in other countries;

Finland's model is thus characterised by strong legal protections and advanced victim-centred principles, but uneven operational practice and limited specialisation create inconsistencies in the identification and handling of child-trafficking cases.

4. Greece

Policy & Legal Framework

The Greek legal framework incorporates strong victim-protection provisions, particularly for children, who are entitled to immediate assistance, specialised care, and exemption from penalties for unlawful acts committed in the context of their exploitation **Greece** transposed EU standards relatively consistently and has an established National Referral Mechanism, although the report notes gaps in implementation, especially in cases involving foreign children and age-assessment procedures.

Greece has also introduced specialised legislation and protocols around child protection, asylum, and guardianship, which intersect frequently with trafficking cases due to the country's position as a major entry point for unaccompanied migrant children. Despite significant legal safeguards, the report highlights persistent challenges: fragmented practices in identification, inconsistent application of child-specific safeguards, and procedural delays in the protection of high-risk children at the borders.

Criminal-Law Dimension

Greece's anti-trafficking system is anchored in a comprehensive legislative framework that criminalises trafficking for all major forms of exploitation, including sexual exploitation, labour exploitation, forced begging, removal of ova, tissues and organs and exploitation in criminal activities; exploitation through illegal adoption is not criminalised as a form of trafficking and surrogacy-related schemes, although explicitly highlighted in the Greek report as an emerging and complex form of child trafficking, is not yet mentioned explicitly as a form of exploitation in the Criminal Code. Trafficking of children is classified as an aggravated form of human trafficking.

Institutional Landscape

The institutional framework is highly centralised around a set of designated anti-trafficking bodies. The Office of the National Rapporteur on Trafficking in Human Beings coordinates national policy, promotes inter-agency cooperation, and oversees data collection. Operationally, the Hellenic Police lead trafficking investigations through specialised units Prosecutorial handling of trafficking cases

is carried out by regional prosecutors, but the country lacks a consistently specialised prosecutorial structure for trafficking of human beings, resulting in variability in expertise across regions.

Child protection responsibilities in Greece are shared among social services, specialised NGOs, and agencies working with asylum-seeking children. With regards to children from third countries, Safe Areas within the Reception and Identification System experience high pressure during certain periods, depending on migration flows. Greece's report identifies this institutional overload as one of the deterrents to the early identification of child victims. However, since January 2024, the establishment of a structured National Guardianship System for Unaccompanied Minors- which prioritises the most vulnerable UAM cases- has created a protective framework that also functions as a preventive mechanism.

Unique Features

Greece stands out among the partner countries for the degree to which migration flows and border dynamics shape its child-trafficking realities. The high number of unaccompanied children entering the country places sustained pressure on frontline services and complicates early detection. Furthermore, the presence of trafficking networks linked to illegal adoption and surrogacy (where victimisation extends beyond the surrogate mother to include the child) is a distinct national pattern not mirrored elsewhere in the consortium. These features make Greece a system where strong legal provisions coexist with chronic operational strain and a vulnerability profile heavily influenced by continuous migratory arrivals.

5. Italy

Policy & Legal Framework

Italy's legal framework criminalises all major forms of trafficking, including sexual exploitation, labour exploitation, forced begging, and child-specific forms of abuse (child prostitution and child pornography). Children benefit from reinforced protection measures, including specialised accommodation, immediate assistance, and exemption from penalties for offences committed under coercion. The Italian legal and institutional framework for combating trafficking is closely aligned with international standards and integrates trafficking provisions within a broader system of protections for asylum-seeking and unaccompanied children — a crucial dimension given Italy's role as a key entry point into Europe. Despite a solid legal basis, the report highlights persistent gaps in implementation, particularly for non-Italian children, whose identification and referral remain inconsistent across regions.

Criminal-Law Dimension

Italian criminal law criminalises sexual exploitation, labour exploitation, forced begging, coercion and exploitation linked to servitude. Offences involving children are automatically severe. **Italy**'s legal system pays particular attention to the trafficking of unaccompanied children transiting irregular routes through the Mediterranean – a reality deeply embedded in its criminal practice.

Institutional Landscape

Italy's anti-trafficking response is overseen by a national anti-trafficking department within the Ministry of Equal Opportunities, which coordinates a network of regional anti-trafficking projects

and service providers. The institutional system is highly regionalised, with significant variation in capacity and practice between northern and southern regions. Law enforcement involves both the State Police and the Carabineri, including specialised investigative units with experience in transnational organised crime. Child protection structures – municipal social services, dedicated shelters, guardianship systems for unaccompanied children – operate but are uneven in quality and overburdened in major arrival hubs, affecting early identification and long-term support for trafficked children.

Italy's trafficking landscape is strongly shaped by its position as a primary Mediterranean entry point, creating a disproportionate exposure to cases involving foreign children, especially unaccompanied children arriving via sea routes. These dynamics intersect with **Italy**'s distinctive non-conditional protection model, which grants assistance irrespective of a victim's participation in criminal proceedings. The regionalised structure of anti-trafficking services, while enabling tailored local responses, also produces inconsistencies in practice and access to specialised support. These features make **Italy**'s system uniquely defined by both migration-driven caseloads and a protection-centred legislative philosophy.

6. Poland

Policy & Legal Framework

Poland's framework combines national anti-trafficking strategies with established child-protection rules. The country's geographic position shapes its policies, positioned between countries of origin (East) and destination (West). Prevention, cross-border cooperation, and support for children are central to policy documents. Child victims – including foreign children – are entitled to protection and assistance, but the system remains highly legalistic, with identification often depending on formal procedural decisions.

Criminal-Law Dimension

Poland criminalises trafficking for sexual exploitation, labour exploitation, forced criminality, and exploitation of begging, with child victims receiving automatic classification as trafficked, regardless of means used. Polish law does not contain a separate legal term for "child trafficking"; therefore, all provisions concerning human trafficking must also be interpreted in the context of child trafficking. In the case of a child, the critical element is the intent to exploit, rather than the use of coercive or deceptive means. Polish criminal law does not provide for a higher base penalty when the victim is a child, although the involvement of a child may constitute an aggravating factor during sentencing. Recognising gaps in the legal framework, the government is pursuing the drafting of a dedicated Act on Counteracting Trafficking in Human Beings, aimed at consolidating and clarifying the existing fragmented legal provisions. Poland is expected to implement the revised EU Directive 2024/17124 and respond to recommendations from the Council of Europe's GRETA, particularly in enhancing victim protection, improving access to compensation, and ensuring adequate legal aid.

Institutional Landscape

Poland's response to human trafficking is coordinated through a structured network of public institutions forming the National Referral Mechanism (NRM), which includes the Inter–Ministerial Team for Counteracting Human Trafficking, the Ministry of the Interior and Administration, the Office for Foreigners, the National Police, the Boarder Guard, the Children's Rights Ombudsman, Regional

(Voivodeship) Teams, the Public Prosecutor's Office, the Ministry of Family, Labour and Social Policy and the National Consulting and Intervention Centre. Together, these institutions form a multi–layered national framework that combines policymaking, law enforcement, child protection, and social assistance. Operational work is undertaken by specialised police units, border guards, social services, foster care systems, and NGOs participating in the National Consultation and Intervention Centre (KCIK). The country has seen increased pressure due to the inflow of Ukrainian children, which has complicated identification and monitoring. The report notes persistent gaps in inter-agency collaboration, inconsistent regional capacities, and challenges in ensuring continuity of care for foreign children, especially those moving onward to Western Europe.

Unique Features

Poland's system is shaped by its geopolitical position as both a country of origin and a major transit point, particularly in the context of regional displacement. Child trafficking cases often involve Polish children exploited abroad (especially sexually) and foreign children passing through the country. Poland's strong central coordination contrasts with variable local-level practice (e.g. available victim-support services are concentrated in major cities and dominated by a few organizations), and legal aid remains heavily dependent on formal identification decisions.

Another distinctive feature of the Polish system is its advanced integration of artificial intelligence into online-facilitated trafficking detection, particularly in cases involving child sexual exploitation. Authorities make systematic use of AI-enabled tools such as Interpol's ICSE hash-matching system, the Dyżurnet.pl automated triage platform, real-time monitoring of high-risk digital spaces, and emerging predictive-modelling capacities–placing Poland among the more technologically adaptive anti-trafficking frameworks in the region.

7. Portugal

Policy & Legal Framework

Portugal's framework is built around national strategies, gender-equality structures, and a decentralised child-protection system. **Portugal**'s policies reflect its dual role as a destination and to a lesser extent transit country, with a strong emphasis on prevention and public awareness.

Criminal-Law Dimension

Portugal's criminal framework recognises all major forms of human trafficking, including sexual exploitation, labour exploitation, exploitation of begging, and trafficking of children. The law establishes aggravated penalties when the victim is a minor and ensures that children are treated primarily as victims in need of protection. **Portugal** has transposed EU anti-trafficking obligations and integrates trafficking within broader child-protection legislation, particularly for unaccompanied children and foreign children. The report highlights **Portugal**'s relatively robust legal architecture, but also notes gaps in early detection and referral, especially for migrant children who arrive irregularly.

Institutional Landscape

Portugal operates a multi-agency coordination model led by the Commission for Citizenship and Gender Equality (CIG) and the Observatory on Trafficking in Human Beings (OTSH). The OTSH collects data and supports evidence-based policymaking. Portugal has a National Support and Protection

Network for Victims of Human Trafficking, which extends regionally through five support and protection networks operating in collaboration with public entities and civil society organisations. Law enforcement bodies – including the Judiciary Police and border authorities – handle investigations, while labour exploitation cases involve the Authority for Working Conditions. Despite the existence of national mechanisms, the report stresses operational fragmentation, particularly when cases involve children in informal migration flows or situations where trafficking overlaps with asylum and guardianship procedures.

Unique Features

Although Portugal stands out for its broad data-driven institutional infrastructure (through OTSH, disaggregated child-specific data is lacking). Existing structures, such as the OTSH and the CIG, provide a solid foundation but need more systematic data collection to effectively monitor and evaluate child trafficking cases. Yet its main vulnerabilities are tied to migration dynamics: trafficked children often appear within mixed-migration flows, creating difficulties in distinguishing trafficking from smuggling and in ensuring consistent protection across regions. The system is therefore characterised by strong national–level structures but uneven operational implementation on the ground.

8. Romania

Policy & Legal Framework

Romania's framework is organised around a central National Agency Against Trafficking in Persons (ANTIP), national strategies, and a structured child-protection system. The country's status as a major origin country strongly shapes prevention-oriented policies, data-collection efforts, and community outreach. The National Integrated System for Monitoring and Evaluation of Victims (SIMEV) is highlighted as a unique asset, allowing structured tracking of minor victims over time.

Criminal-Law Dimension

Recent amendments to **Romania**'s Criminal Code strengthened penalties for trafficking, raising the minimum sentence for trafficking in children from three to five years and expanding the list of aggravating circumstances. The law now explicitly targets situations where the perpetrator is a family member, cohabitant, or a person responsible for the child's care, protection, or education, and it recognises abuse of trust, authority, or the child's vulnerability–including disability, dependence, or incapacity–as factors that increase criminal liability.

Institutional Landscape

Romania has a centralised national coordination structure, with the National Agency Against Trafficking in Persons serving as the lead body for prevention, data collection, coordination, and policy development. Identification involves the police, specialised anti-trafficking prosecutors, child-protection services, labour authorities, and non-governmental organisations. Despite this centralised architecture, the report highlights persistent weaknesses: insufficient financial and human resources to prevent trafficking, protect victims, and provide specialised child protection services, as well as limited NGO funding. Many identified trafficking victims had previously been in institutional care, underscoring the need for stronger child protection.

Unique Features

Romania is unique within the consortium for the scale and persistence of child trafficking, including high rates of sexual exploitation of adolescent girls and a notable presence of forced begging affecting infants and very young children. Online sexual exploitation is widely recognised as a rapidly expanding form. The report also highlights vulnerabilities stemming from generational trauma, social marginalisation, disorganized family structures, unmonitored access to social media, and the normalisation of sexual violence and exploitation.

Despite numerous campaigns, awareness of human trafficking remains limited, particularly among children, whose understanding of risks is often superficial and may foster a false sense of security. Many perceive trafficking as a distant threat, while prevention efforts focus on urban areas and overlook rural vulnerabilities. Limited resources and expertise constrain ANITP, NGOs, and local authorities from conducting regular prevention.

PART III PRACTICAL MODULES

The Handbook is organised around the four well-established pillars of anti-trafficking action: prevention, protection, prosecution, and partnership. To reflect how actual cases unfold in practice, an additional module on identification is placed between prevention and protection, ensuring that the Handbook covers the full trajectory–from underlying causes and early risk factors through to criminal investigation and prosecution.

Each module follows the same internal logic: First, **key frameworks** set out the relevant international and EU legal and policy instruments, providing a concise orientation to the obligations and standards that govern action in that area. Second, **gaps and promising practices** translate those frameworks into practice by presenting evidence from the eight country reports. This section highlights where systems struggle, where they succeed, and how different approaches play out on the ground. Third, **recommendations** draw directly from the frameworks and the country–level findings, offering targeted, actionable guidance aimed at addressing identified gaps and strengthening effective practices. Finally, **practical tools** bring together resources, with direct links to instruments, platforms, and guidance materials that can support decision-making and case handling when professionals face uncertainty in real-life situations.

Before these modules, the Handbook opens with two foundational sections. The first traces the origins and meaning of the "4 Ps", clarifying how this framework emerged and why it remains central to contemporary anti-trafficking policy and practice. The second sets out child-sensitive identification principles, grounding the entire Handbook in a rights-based, child-centred approach and establishing the standards that inform all subsequent analysis, tools, and recommendations.

The Four Ps of Anti-Trafficking Action

Child trafficking is seldom confined within a single country's borders - it is an inherently transnational crime involving the movement of victims and perpetrators across jurisdictions. Embedded in cross-border criminal infrastructures, traffickers coordinate the movement of children across borders, targeting locations where weak enforcement and protection and high demand promise greater profits. Children remain disproportionately affected: globally the share of child victims reached nearly 38% of detected cases by 2022.[6]

According to the European Commission's Fifth Report on progress in combating trafficking in human beings in the EU, in 2021-2022 children accounted for 19% of all registered victims. The vast majority of child victims were EU nationals (81%, or 2,401 children), and most were exploited within their own Member State (88%, or 2,120 children). Compared with 2019–2020, the share of registered child victims declined by 3%. This downward trend may partly reflect the growth of online sexual exploitation, where many victims remain undetected. In addition, some Member States do not formally register trafficked children as trafficking victims in order to ensure access to broader child protection services.These figures - almost certainly underestimates – highlight the scale and persistence of a crime that crosses national and regional boundaries.

6 UN Global Report on Trafficking in Persons 2024

According to the UN Global Report on Trafficking in Persons 2024, Central and South-Eastern Europe recorded an increased share of detected girl victims, trafficked for the purpose of sexual exploitation, rising from 27% to 33% of the total victims. This trend suggests that, by 2022, girls in these regions were increasingly targeted for sexual exploitation compared to 2019. Over the same period, Western and Southern Europe recorded a 40% increase in the number of detected boy victims per 100,000 population, primarily trafficked for forced labour and other forms of exploitation. Most of these boys were foreign nationals, mainly from North Africa, Sub-Saharan Africa, and Asia, reflecting the gender and nationality profiles of unaccompanied children recorded in these regions during the same period.

According to Eurostat, 9,678 victims of human trafficking were registered in the EU in 2024, of whom 19% were children (1,832). Women and girls accounted for 63% of all registered victims, a slight decrease compared to 2023. Overall, 28% of victims were nationals of the reporting country, 8% other EU citizens, and 64% non-EU nationals, with significant variation across Member States: countries such as **Bulgaria, Romania**, and **Slovakia** reported mainly domestic victims, while **Austria**, **Italy**, **Spain**, **Portugal**, **Greece**, and Ireland, among others, reported over 80% non-EU victims.

International efforts to combat child trafficking are grounded in comprehensive legal and policy frameworks. At the global level, the 1989 United Nations Convention on the Rights of the Child obliges states to adopt national, bilateral, and multilateral measures to prevent the abduction, sale, or trafficking of children. The 2000 UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (Palermo Protocol) established the three foundational pillars of anti-trafficking action–**Prevention, Protection, and Prosecution**–which have since become the backbone of global policy. Over time, a fourth pillar, **Partnership**, became formally recognised, reflecting the need for coordinated multi-agency and cross-border cooperation. Together, these **Four Ps** now constitute the internationally accepted strategic framework for combating trafficking and safeguarding victims.

Regionally, the 2005 Council of Europe Convention on Action Against Trafficking in Human Beings reinforced these standards with a legally binding, rights-based framework and an independent monitoring mechanism through the Group of Experts on Action against Trafficking in Human Beings (GRETA).

Within the European Union, Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims was the core legal instrument, setting minimum rules for the definition of criminal offences and sanctions at the national level. Directive (EU) 2024/1712 amends and significantly strengthens Directive 2011/36/EU by expanding the definition of exploitation to include forced marriage, illegal adoption, and exploitative surrogacy. It requires Member States to adopt national action plans, criminalise the knowing use of services provided by trafficking victims, and apply harmonised penalty thresholds, including aggravated circumstances involving public officials or ICT-facilitated exploitation. The Directive also reinforces corporate liability, broadens the non-punishment principle for victims and introduces enhanced safeguards for victims in need of international protection and strengthens assistance and support standards for child victims of trafficking. It improves access to compensation by ensuring victims can benefit from existing schemes for victims of intentional violent crime and allows Member States to establish national victims' funds.

The 2021–2025 EU Strategy on Combatting Trafficking in Human Beings renewed EU priorities by addressing online recruitment, financial investigations, and child-specific vulnerabilities, while reinforcing the Four-P structure.In December 2025, the European Commission launched a Call for

Evidence for the new EU Strategy on Combating Trafficking in Human Beings, scheduled for adoption in the end of 2026.

International and regional organisations give this framework practical force. The United Nations Office on Drugs and Crime (UNODC) leads global data collection and cross-border cooperation mechanisms. The International Organization for Migration (IOM) remains central in victim assistance, safe return, and reintegration. United Nations Children's Fund (UNICEF) strengthens national child-protection systems and cross-border referral pathways. The Organization for Security and Co-operation in Europe (OSCE) promotes coordinated anti-trafficking policy among its 57 states. Within the EU, agencies such as the European Union Agency for Law Enforcement Cooperation (Europol), the European Union Agency for Criminal Justice Cooperation (Eurojust), the European Border and Coast Guard Agency (Frontex), the European Union Agency for Fundamental Rights (FRA), the European Union Agency for Law Enforcement Training (CEPOL), and the European Union Agency for Asylum (EUAA) support operational cooperation, child-sensitive protection, and coherent cross-border case management.

By aligning the Handbook with the Four Ps framework, this structure maintains continuity between the international legal and policy architecture and the realities faced by practitioners. It provides a coherent pathway from high-level principles to specific measures, equipping professionals with the knowledge, tools, and strategies needed to respond effectively to trafficking risks while strengthening institutional and cross-sectoral partnerships.

Child-sensitive identification principles

International law recognises that trafficked children experience distinct and heightened forms of harm that require responses fundamentally different from those applied to adults. Their physical dependence, psychological development, and limited capacity to protect their own interests mean that identification, protection, and support must be governed by child-specific safeguards. This principle, together with those outlined below, is firmly embedded in the Palermo Protocol, the UN Convention on the Rights of the Child, and international guidelines (such as the Recommended Principles and Guidelines on Human rights and Human trafficking by the Office of the High Commissioner for Human rights, UNICEF Guidelines on the Protection of Child Victims of Trafficking, UNODC Teaching Module Series: Trafficking in Persons & Smuggling of Migrants and UNODC Toolkit to Combat Trafficking in Persons), all of which require that the **best interests of the child** be a primary consideration in every decision affecting a trafficked child, irrespective of the authority involved.

A core legal implication of this approach is the definition of child trafficking itself. In line with the Palermo Protocol, trafficking of a child is established solely by the act and purpose of exploitation; proof of coercion, deception, or abuse of power is neither required nor appropriate. This reflects the understanding that children cannot validly consent to their exploitation and must therefore benefit from a lower evidentiary threshold for recognition as victims. States are consequently required to ensure that both legal frameworks and policy instruments reflect this protective logic and do not impose adult-oriented standards that delay or obstruct identification.

Rapid and proactive identification is a central safeguard. International standards stress the need for procedures that enable early detection of child victims across a wide range of settings, including border controls, asylum systems, child-protection services, education, healthcare, and law

enforcement. Identification must immediately trigger protection rather than investigation alone. Children must not be subjected to criminal proceedings or sanctions for offences committed as a direct consequence of their trafficking, including irregular migration, petty crime, or exploitation-related activities. This non-punishment principle is particularly critical in preventing secondary victimisation and maintaining trust in authorities.

Once identified, trafficked children are entitled to comprehensive protection and support measures tailored to their individual circumstances. Where children are unaccompanied or separated, authorities must take steps to identify and assess the possibility of family reunification, based on a thorough risk assessment and consultation with the child. Reunification should proceed only where it is safe and in the child's best interests. Where return to the family is not possible or appropriate, States must ensure adequate alternative care arrangements that respect the child's dignity, stability, and long-term development, rather than relying on temporary or unsuitable placements.

Participation rights are another essential component of a child-sensitive approach. Children capable of forming their own views must be given the opportunity to express them freely in all matters affecting them, including decisions on care arrangements, return, or long-term solutions. Their views must be given due weight in accordance with their age and maturity, reinforcing the principle that protection does not negate agency.

Specialised policies and programmes are required to operationalise these obligations. Trafficked children should receive integrated physical, psychosocial, legal, educational, housing, and healthcare assistance, delivered by professionals trained specifically to work with child victims of exploitation. Protection must extend throughout criminal proceedings against traffickers, including safeguards to prevent intimidation, retaliation, or unnecessary exposure, as well as effective access to compensation mechanisms. Privacy and identity protection are critical throughout this process to avoid stigma, retaliation, or re-exploitation.

Finally, international standards emphasise the need for specialised training for all professionals likely to come into contact with trafficked children. Legal, psychological, and child-development expertise are essential to ensure that identification, protection, and support measures are implemented consistently and in a manner that genuinely prioritises the child's rights and well-being.

Taken together, these measures reinforce a central principle: child victims of trafficking must be treated as rights-holders with specific needs that require dedicated legal, institutional, and professional responses at every stage of identification and protection.

Module 1 Prevention

1. Key frameworks

International anti-trafficking prevention is grounded in the recognition that child trafficking is rooted in structural vulnerabilities rather than isolated criminal acts. The Palermo Protocol establishes prevention as a core state obligation, requiring comprehensive and coordinated policies that reduce trafficking risks, protect children from re-victimisation, and address the conditions that enable exploitation. Prevention is therefore understood as a continuous, cross-sector process combining policy, social measures, and institutional coordination, rather than a single intervention.

In practice, this approach encompasses research and data collection, awareness-raising, education, and targeted social initiatives. Across partner countries, preventive measures are most effective when embedded in everyday institutional settings—such as schools, child-protection systems, asylum and migration procedures, and labour oversight—where early risk indicators can be identified and acted upon. The country reports consistently show that awareness campaigns alone are insufficient unless they are linked to mechanisms that enable timely referral, protection, and follow-up.

Both the Palermo Protocol and EU instruments emphasise cooperation with civil society as a central element of prevention. Non-governmental organisations play a critical role in community outreach, work with marginalised groups, and trust-building with children who may be reluctant or unable to engage with authorities. Prevention outcomes improve where such actors are formally integrated into national strategies and referral frameworks, rather than operating on an ad hoc or project-based basis.

Within the European Union, Directive (EU) 2024/1712 requires Member States to implement targeted and differentiated prevention and demand-reduction measures that reflect the specific forms of trafficking and exploitation. These measures include education, training, and awareness-raising campaigns–particularly addressing the online dimension–and must be gender-sensitive and child-friendly, with a focus on reducing the risk of victimisation among vulnerable groups such as children and persons with disabilities. To further curb demand, Member States must also criminalise the intentional use of services provided by a trafficking victim where the user knows of the exploitation, and ensure that such offences are punishable by effective, proportionate, and dissuasive penalties.

Awaiting the new strategy, the 2021–2025 EU Strategy on Combatting Trafficking in Human Beings reinforces these obligations by noting that despite existing prevention initiatives, demand for services, labour, and products derived from the exploitation of victims–by businesses, employers, users, and consumers–remains largely unaddressed. It promotes coordinated awareness campaigns, enhanced cooperation between authorities and labour inspectorates, and joint inspections in high-risk sectors, supported by EU agencies. Prevention responsibilities increasingly extend beyond public authorities to the private sector. Businesses operating in labour-intensive and high-risk industries are expected to apply due diligence, ensure transparency in supply chains, and integrate anti-trafficking standards into internal governance. Emerging EU initiatives on sustainable corporate governance, responsible public procurement, and trade policy seek to embed prevention into market regulation by addressing forced and child labour within global value chains.

Taken together, international and EU frameworks articulate a layered prevention architecture operating across the entire trafficking cycle. Prevention is most usefully understood through a three-tier model widely applied in public health and victim-protection contexts. Primary prevention

seeks to reduce exposure to risk by addressing structural drivers such as poverty, exclusion, and lack of opportunity. Secondary prevention focuses on individuals or groups showing early indicators of vulnerability, relying on trained professionals and multi-agency cooperation to intervene before exploitation occurs. Tertiary prevention aims to prevent re-victimisation through specialised support, rehabilitation, and long-term reintegration.

This tiered logic aligns with prevention measures across areas of origin, transit, and destination. In countries of origin, prevention addresses socio-economic conditions, recruitment practices, and community-level vulnerabilities. In transit contexts, it focuses on early detection, while avoiding measures that unduly restrict legitimate mobility. In destination countries, prevention centres on labour market regulation, oversight of recruitment channels, safe migration pathways, and measures to curb demand. Across all contexts, the underlying principle remains consistent: prevention is effective only when it reflects the full trajectory of exploitation and is grounded in real vulnerabilities and incentives, rather than generic or symbolic responses.

Table 1. Area-Based Prevention vs. Primary/Secondary/Tertiary Prevention[7]

Type of Prevention Measure	Primary Prevention (reduce vulnerability before trafficking occurs)	Secondary Prevention (early detection / interrupting the trajectory)	Tertiary Prevention (prevent re-exploitation & address ongoing harm)
Awareness-raising & information campaigns	**Origin** Informing potential migrants, families, youth about risks; culturally tailored messages	**Origin/Transit** Targeted alerts for high-risk individuals already considering unsafe migration routes	**Destination** Awareness for employers and communities to reduce demand that fuels re-victimisation
Income-generation, microcredit, job creation	**Origin** Structural vulnerability reduction; alternatives to risky migration	(Limited alignment) – Does not generally intervene once a risky path is taken	(Not applicable)
Education & life-skills training	**Origin** Skill-building to reduce vulnerability long before exploitation	**Origin** Reaching youth already exposed to risky situations	**Destination** Integration training to reduce re-victimisation risk

7 The table cross-references the two models of prevention discussed above. It is informed by the same sources but does not reproduce or derive directly from any single one.

Type of Prevention Measure	Primary Prevention (reduce vulnerability before trafficking occurs)	Secondary Prevention (early detection / interrupting the trajectory)	Tertiary Prevention (prevent re-exploitation & address ongoing harm)
Targeted interventions for high-risk groups	**Origin** Based on evidence (domestic abuse survivors, specific ethnic groups, unskilled youth)	**Transit** Detecting high-risk individuals on the move	**Destination** Support for previously trafficked persons to prevent re-entry into exploitation
Strengthening social protection systems	**Origin** Child protection, birth registration, community safety nets	**Transit** Referral mechanisms when vulnerabilities are detected	**Destination** Survivor support networks to prevent recurrence
Regulation/ monitoring of recruitment agencies	**Origin** Oversight of local recruiters; licensing systems	**Transit** Stopping abusive cross-border or informal recruitment chains	**Destination** Regulation of labour brokers in high-risk sectors
Border and transit-point interceptions	(Minimal alignment)	**Transit** Early interception, identification, removal from trafficking pathways	Sometimes **Destination** immigration checks identifying victims already exploited
Labour inspections & enforcement in destination countries	(Minimal alignment)	**Destination** Inspections detecting early exploitation	**Destination** Breaking ongoing exploitation cycles, ensuring long-term protection
Safe facilities for migrants (drop-in centres, shelters)	**Origin** Safe migration info points	**Transit** Safe spaces preventing capture by traffickers	**Destination** Key tertiary measure: stabilisation, recovery, long-term safety
Measures targeting demand (criminalisation of knowing use, due diligence, supply chain controls)	**Destination** Reducing structural drivers of exploitation	**Destination** Identifying ongoing exploitation via enforcement	**Destination** Preventing repeated demand-driven abuse after rescue
Publicity/spikes in media attention	**Origin** Raising public awareness	**Transit/Destination** Rapid alerts	Rarely applicable (and often ineffective)

2. Gaps and promising practices

Preventive measures are strongest where they operate through comprehensive policy environments that combine risk reduction with early protection. **Finland** exemplifies this approach by embedding prevention within labour inspection, child-protection, asylum, and welfare systems, enabling institutions to detect vulnerability through routine professional contact. This integration aligns with the broader prevention logic underpinning EU and international frameworks, which prioritise institutionalised safeguards over isolated awareness activities.

Several countries explicitly link prevention to contexts of heightened vulnerability. **Italy** and **Greece** frame significant parts of their preventive efforts around migration and reception systems, recognising that unaccompanied and migrant children face increased exposure to exploitation at points of arrival, accommodation, and legal uncertainty. Between December 2024 and January 2025, the Hellenic Ministry of Migration and Asylum organised four specialised, interpreted workshops in unaccompanied girls' shelters in Attica to raise awareness on grooming, online safety, healthy relationships, and personal safety planning among migrant girls. In parallel, the Ministry, in cooperation with the University of Thessaly and NGO A21, held educational conferences and interactive workshops on migrant vulnerability, child protection, human rights, and human trafficking, reaching more than 200 school students.

A consistent promising practice across the reports is the formal involvement of non-governmental organisations in preventive action. Civil society and guardians are central actors in community outreach, awareness-raising, and trust-building in **Belgium** (Child Focus' Girl Power Squad, Caritas awareness videos for unaccompanied; Fedasil guidelines to recognise signs of human trafficking; ReACT learning tools; XtraMena project), **Bulgaria** (BRTIM cycle of regional information campaigns; "Hidden Dangers on the Internet" information campaign), **Finland**, **Poland** ("Don't be Indifferent" campaign; programmes by Caritas, KIND, and Fundacja Vela on cyber safety) **Portugal** (a training programme by Saúde em Português; "Mercadoria Humana 4" project; a 2022 campaign by the Portuguese Association for Victim Support), and **Romania** (the ProTECT Platform; 'Your Safety is Not a Game' campaign).

Despite these advances, the reports reveal persistent gaps in addressing the structural drivers of trafficking. Prevention remains uneven and territorially fragmented in **Bulgaria, Romania**, and **Greece**, with rural areas and socially excluded communities receiving limited coverage. While poverty, educational disengagement, institutional care, and migration-related instability are consistently identified as underlying risk factors, preventive responses rarely tackle these vulnerabilities in a sustained or cross-sector manner. This weakens the capacity of prevention to interrupt trafficking risks before exploitation occurs.

Both **Greece** and **Poland** highlight the need for a coherent, centrally coordinated national prevention strategy. In both countries, the absence of overarching coordination results in fragmented responsibilities, project-based initiatives with limited sustainability, uneven training of frontline professionals (teachers, social workers, police), and weak evaluation of long-term impact. Demand-side prevention is another area of systemic weakness. Labour exploitation is recognised across all country reports, yet labour inspection services are rarely positioned as key anti-trafficking actors capable of disrupting exploitation at an early stage. **Portugal** highlights how traffickers exploit systemic gaps, notably inspectors' lack of authority to formally identify victims and the continued imposition of illegal recruitment fees despite legal prohibitions. **Belgium** offers a partial exception through specialised teams in each provincial directorate of the National Office for Social Security carrying out

targeted inspections in high-risk sectors, in cooperation with federal police and labour prosecutors and supported by increased staffing. Nevertheless, identifying child victims remains particularly challenging, as they are often undeclared and exploitation frequently occurs in informal or private settings, such as domestic work, where inspections are difficult to conduct.

Overall, most country reports suggest that prevention is most effective when it is comprehensive, institutionally anchored, and linked to protection and referral mechanisms across sectors. Conversely, prevention is least effective where it relies on generic awareness campaigns, short-term initiatives, or under-resourced services in high-risk environments. This pattern underscores the importance of prevention measures that are embedded, coordinated, and responsive to the concrete vulnerabilities identified in national contexts.

3. Recommendations

- **Institutionalise prevention within frontline systems:** Prevention should be embedded in routine practice within child protection, education, asylum, labour inspection, and healthcare systems. Countries where prevention relies on *ad hoc* projects or awareness campaigns show weaker early identification and referral outcomes.

- **Shift from generic awareness to targeted, risk-based interventions:** Risk based prevention measures should include both online and offline environments, reception centres, institutional care, marginalised and rural communities, and sectors prone to labour exploitation.

- **Strengthen professional capacity for early detection:** Regular, mandatory training for frontline professionals is essential to recognise early indicators of trafficking, particularly in online contexts and migration-related settings. Training should focus on practical detection and referral, not solely legal definitions.

- **Formalise and resource civil society involvement in prevention:** Civil society plays a preventive role through outreach and trust-building. Their contribution is most effective where it is formally integrated into national coordination and referral mechanisms, supported by structural funding rather than short-term projects.

- **Address structural vulnerabilities through coordinated social responses:** Child trafficking is a cross-cutting, intersectoral issue. This requires strong links between anti-trafficking policies and other sectors, such as social inclusion, education, and child welfare systems.

- **Strengthen demand-side and labour-market prevention:** Labour inspections and regulatory oversight should be reinforced in high-risk sectors, with clearer preventive mandates and adequate resources. Demand reduction remains underdeveloped across most countries and requires stronger alignment between labour regulation, corporate responsibility, and child protection.

- **Enhance prevention in digital environments:** Online-facilitated trafficking requires proactive monitoring, reporting, and early intervention mechanisms. Preventive use of technology–combined with safeguards for children's rights–should be expanded beyond isolated good practices to a more systematic approach.

- **Strengthen data collection**, as objective assessments of the scale of trafficking are essential for securing adequate resources and informing effective policy responses.

- **Establish systematic evaluation mechanisms** for prevention policies to assess their impact, effectiveness, and long-term outcomes, and to support evidence-based adjustments.

4. Practical tools

- EU Department of Migration and Home Affairs' 2024 campaign, 'End human trafficking. Break the invisible chain'. Provides free campaign materials and resources, 10 signs that someone is a human trafficking victim.

- Europol: advice on spotting fake job adverts, advice on avoiding the lover boy scam.

- EU Anti-trafficking Hub (relates to multiple sections), cornerstone in developing EU policy in combatting and preventing human trafficking.

- ELA's campaign on the risks of trafficking for the purposes of labour exploitation, 'Rights for all seasons', particularly the vulnerability of seasonal workers across EU.

- Awareness raising campaign by French government during 2024 Paris Olympics and Paralympics to counter sexual exploitation. Free resources and materials on forms exploitation can take, including sexual, labour, domestic slavery and undignified living conditions

- Migrant as Messenger, a campaign implemented by IOM Belgium, where trafficking survivors raise awareness within their communities in countries of origin.

- Girl Power Squad, a Belgian program designed to empower young girls living in residential institutions

- Educational "Escape Truck" as part of a Polish nationwide campaign against human trafficking

- CATCH & SUSTAIN, Anti-Trafficking Intervention Programme Targeted to Vulnerable Children

- Wishes fulfilled at the right ages, a Romanian campaign, dedicated to protecting children against abuse, trafficking and exploitation, promoting the fundamental rights of the child: the right to education, health, opinion, protection and non-discrimination.

- The ProTECT Platform is a coalition of Romanian NGOs dedicated to combating human trafficking and protecting victims' rights. It serves as a resource center for its members and other entities, facilitating collaboration in prevention, victim protection, advocacy, and public policy development.

- Footprints of Hope: Digital Child Manual in the form of a Fairy tale was developed within the ERADICATING project and aims to raise awareness among the student community about trafficking in human beings, with a particular focus on mixed forms of exploitation affecting children. The Manual is presented in the form of a fairy tale, an approach especially suited to a young and sensitive audience, allowing complex and delicate issues such as human trafficking and child sexual exploitation to be addressed in an accessible and age-appropriate manner.

- Youth Club "Let's Be Friends", run by the Bulgarian PULSE Foundation, addresses key topics such as youth participation, prevention of violence (including human trafficking), building healthy relationships, mental health, and critical thinking.

- Safe Hut initiative for the empowerment of women and girls, by the Bulgarian Animus Foundation, provides a safe and supportive space where women and their children meet twice a week to engage in activities promoting empowerment, relaxation, creativity, and social inclusion.

- Project "Breaking the Chain", implemented by the Bulgarian Dignita Foundation, focuses its efforts on outreach to vulnerable and marginalised groups, particularly segregated Roma communities, where it conducts awareness-raising and empowerment sessions designed to build resilience and prevent exploitation.

Module 2 Identification

1. Key frameworks

International anti-trafficking law approaches victim identification indirectly rather than through a single procedure. The Palermo Protocol does not explicitly regulate victim identification as an obligation. Instead, it embeds identification implicitly through its definition of trafficking, which functions as the conceptual basis for recognising victims, and through requirements to protect victims' privacy and safety, particularly in legal proceedings (Article 6). The absence of a mandatory identification mechanism has resulted in significant variation across national systems, with states developing divergent approaches to identifying victims within their domestic legal and institutional frameworks.

This gap is more explicitly addressed at EU level. Directive (EU) 2024/1712, amending Directive 2011/36/EU, places strong emphasis on improving the early detection and identification of victims of trafficking, in response to persistent gaps identified by the Commission. The Directive recognises that trafficking is increasingly facilitated through information and communication technologies, which complicates timely identification of victims and perpetrators. To address this, Member States are required to establish formal referral mechanisms aimed at the early detection and identification of both identified and presumed victims, in cooperation with specialised support organisations. These mechanisms must set minimum standards for identification, adapt procedures to the different forms of exploitation covered by the Directive, and ensure swift referral to appropriate assistance and support services. The Directive further strengthens identification by requiring structured cooperation with asylum authorities, ensuring that victims in need of international protection are identified early and receive appropriate assistance. To enhance cross-border identification, Member States must appoint a national focal point for cross-border referrals, facilitating cooperation and continuity of protection when victims move between countries.

The EU Strategy on Combatting Trafficking in Human Beings (2021–2025) further operationalises this obligation by emphasising the central role of frontline professionals–such as border guards, police officers, labour inspectors, social workers, and asylum authorities–in detecting trafficking indicators. Early identification is presented as a prerequisite for timely assistance and protection, as well as for effective investigation and prosecution of traffickers. At the same time, the Strategy highlights persistent challenges, including insufficient training, uneven involvement of civil society organisations, and particular difficulties in cross-border cases where responsibilities are fragmented across jurisdictions.

However,identification alone is insufficient if it is not followed by effective access to assistance, support, and protection. Both the EU Strategy on Combatting Trafficking in Human Beings (2021–2025) and the EU's Fourth Progress Report on Trafficking underline that victims continue to face obstacles in accessing their rights after identification. These include inadequate consideration of individual needs based on age, gender, or form of exploitation; limited access to compensation due to complex procedures; fear of retaliation or secondary victimisation during criminal proceedings; and the perceived risk of penalisation for offences committed under coercion. Reintegration remains especially weak, with limited availability of long-term solutions such as stable housing, education, or access to the labour market.

Children receive particular attention within the EU framework. The Strategy calls for systematic reporting and alerts for missing children, child-specific referral procedures, prompt appointment

of guardians, and effective access to free legal aid. Identification measures are expected to be child-sensitive, rights-based, and adapted to the specific risks faced by children in different contexts, including migration, institutional care, and online environments.

An EU-level study on national and transnational referral mechanisms identified persistent weaknesses, notably in detecting potential victims, ensuring appropriate accommodation - especially for children - strengthening cooperation between authorities and civil society, and monitoring the effectiveness of referral processes across all stages. Cross-border identification and referral remain particularly underdeveloped, prompting the Commission to promote closer cooperation and the gradual development of a European referral cooperation mechanism, supported by relevant EU agencies.

EU agencies (e.g. Europol, Frontex, Eurojust and FRA) also play an increasingly important role in strengthening identification capacity. Through coordinated action under the Commission's leadership, agencies provide operational support, training, guidance, and data analysis within their respective mandates. Their joint commitment aims to improve Member States' awareness of available expertise and to encourage more systematic engagement with EU-level tools and knowledge in early identification and victim protection.

Overall, the EU framework conceptualises identification as a gateway function: it is the point at which trafficking shifts from hidden exploitation to an enforceable rights-based response. Its effectiveness depends not only on legal obligations, but on trained professionals, structured cooperation, and the availability of meaningful protection and long-term support once a victim is identified.

Finland: Labour Exploitation of Undocumented Minors Dismissed Under Outdated Trafficking Law (2025)

This case concerns alleged labour trafficking of undocumented child migrants, that ultimately failed to meet the criminal threshold under the law in force at the time. The events took place in 2011 in Turku, where two undocumented boys aged 14 and 16, later joined by an adult, were offered informal work dismantling cars in unsafe conditions. They lived in poor circumstances, scavenged for food, and were promised minimal pay. The defendant claimed the youths had misrepresented their ages and that he was helping members of his community by providing accommodation.

When the case reached court several years later, the Varsinais-Suomi District Court had to assess it under an old trafficking provision, which had been in force at the time of the alleged crime. This meant requiring proof that the perpetrator had "seized power" over the victims - a higher threshold than in the current law. While the court acknowledged the victims' vulnerability as young, undocumented migrants and recognised indicators of exploitation, it found insufficient evidence that the defendant had deprived them of physical liberty, used explicit threats, or imposed penalties that would amount to forced labour. The victims were able to move freely, had keys to the apartment, and evidence of coercion was deemed inconclusive. As a result, the trafficking charges were dismissed.

The case highlights how legal definitions and evidentiary thresholds can critically shape outcomes in child trafficking cases. It illustrates the difficulty of prosecuting labour exploitation, especially in cases where control is exercised through subtle dependency

rather than overt force. It also underscores the importance of clear child-specific provisions: although trafficking of children does not require proof of coercive means, case law points out to high threshold for securing a conviction of child trafficking.

A persistent operational challenge in victim identification lies in distinguishing trafficked persons from others engaged in similar income-generating activities without coercion or exploitation. This difficulty is particularly acute for immigration and law enforcement authorities, who often encounter individuals in informal labour, sex work, or irregular migration contexts where trafficking indicators may be ambiguous. To address this, a range of identification tools and indicators have been developed to support frontline decision-making (see list with existing tools at the end of the module).

Intelligence-led identification approaches have proven valuable. By analysing the profiles and characteristics of previously identified adult and child victims, authorities can refine risk indicators and focus attention on individuals who may require protection rather than enforcement. Most of the practical tools, listed at the end of the module, outline structured indicators that can support consistent screening and help frontline responders recognise signs of exploitation and vulnerability. At the same time, studies[8] show that overly rigid or simplistic criteria can lead to misidentification or discriminatory practices, underscoring the need for training and contextual analysis.

Border controls represent a critical opportunity for identification in transnational trafficking cases. Where traffickers move victims through official border points, immigration authorities are well positioned to detect risk indicators, particularly in relation to children. Child-specific screening tools developed by international organisations (see list with existing tools at the end of the module) have demonstrated the importance of tailored indicators that reflect age, dependency, and mobility patterns. However, identification at borders is inherently limited along long land and sea routes and in cases where movement occurs through informal crossings.

Law enforcement operations at sites of exploitation, including raids and inspections, can also result in the identification and removal of trafficked persons from abusive situations. Yet such interventions carry significant risks if not carefully planned. Evidence shows that poorly executed raids can cause further trauma to victims and undermine trust in authorities. Human rights bodies therefore stress that identification activities must be accompanied by clear procedural safeguards, proportionality, and guaranteed access to protection and support following removal from exploitative environments.

2. Gaps and promising practices

A central, cross-cutting challenge concerns the subjective experience of victims. In **Belgium, Bulgaria** and **Finland**, practitioners repeatedly underline that children often do not recognise their situation as exploitation or trafficking. Emotional manipulation by traffickers–frequently family members, romantic partners, or persons in positions of authority–normalises abuse and fosters self-blame. **Finnish** experts note that children may lack the language to describe their experiences, may believe they are responsible for what is happening, or may fear consequences for themselves or others if

8 Hainaut, M., Thompson, K. J., Ha, C. J., Herzog, H. L., Roberts, T., & Ades, V. (2022). Are screening tools for identifying human trafficking victims in health care settings validated? A scoping review. *Public Health Reports, 137*(1_suppl), 63S–72S; Lugo-Graulich, K., Meyer, L. F., Souza, K., Tapp, S. N., Maryfield, B., & Bostwick, L. (2024). Improving sex trafficking victim identification: Indicators of trafficking in online escort ads. Journal of Human Trafficking. NCJ Number 309077

they speak. Resistance to disclosure, including silence, rehearsed narratives, or later retraction of statements, can complicate early identification.

Bulgaria: Gaps in identification and victim protection

In this 2009–2010 internal trafficking case in Bulgaria, a 17-year-old girl with mild intellectual disability and a history of running away from home was sexually exploited by a male acquaintance. Despite being reported missing and temporarily returned to her family, the victim continued to be exploited for several months, until a suicide attempt led to compulsory medical treatment.

The case highlights serious gaps in victim identification and protection: authorities failed to ensure her safety after the initial police intervention, and there is no evidence she received support or referral as a trafficking victim. The investigation took nearly a decade to reach trial, reflecting prolonged delays in justice. The perpetrator was eventually convicted by the Regional Court and sentenced to four years' imprisonment and a fine, but information on the final outcome of appeals is unclear.

These challenges are compounded by limitations in frontline capacity. Regarding exploitation in criminal activities, for example, in **Finland**, children are often first encountered by general police patrol units responding to unrelated incidents such as petty crime or behavioural issues. These officers, by design, lack specialised training in trafficking indicators, increasing the risk that exploitation remains hidden behind more visible forms of delinquency or vulnerability. In **Poland**, identification is described as largely reactive: cases tend to surface only after raids, border checks, or whistleblower reports, while proactive detection remains rare. Frontline professionals across institutions report being overstretched, undertrained, and often lacking interpreters or clear procedures, particularly when dealing with foreign or unaccompanied children.

Romania/Germany/Austria: Transnational and Internal Trafficking (2024)

This case involved 28 Romanian victims (9 minors, 19 adults) exploited across Romania, Germany, and Austria by an organized crime network. Minors, aged 12–17, were subjected to sexual exploitation, forced criminality, begging, and, in one case, online sexual abuse. Recruitment and control relied on family indebtedness, threats of violence, confiscation of identity documents, isolation, and constant supervision, leaving victims with minimal freedom or means of communication. Trafficked children were often criminalised for actions committed under coercion.

Victims were identified after a complaint to specialised police in Romania. 24 victims, including the minors, received psychosocial support and legal assistance coordinated by ADPARE in collaboration with the National Agency against Trafficking in Persons and Child Protection Services.

The case highlights persistent gaps in victim identification, especially in destination countries, which impede protection and application of the non-punishment principle for coerced criminal acts. It underscores the need for cross-border cooperation, specialised victim support, and awareness in host countries to prevent prolonged exploitation and ensure effective justice.

Several reports highlight that institutional contact alone does not guarantee identification. In **Belgium** even when children are in contact with youth welfare system and reception centers, identification is not assured, as chronic understaffing, limited supervision, and shortages of safe placements can prevent timely detection and protection of children at risk of trafficking. In **Finland** and **Bulgaria**, trafficked children may be already known to schools, child welfare services, health care providers, reception centres, or youth services, yet their exploitation goes undetected. Professionals struggle to recognise trafficking where abuse overlaps with multiple vulnerabilities, including substance use, behavioural issues, neglect, or different forms of exploitation occurring simultaneously. This complexity mirrors findings in **Italy**, where unaccompanied children often disappear from reception centres shortly after arrival, and in **Romania**, where procedural delays prevent timely identification and access to protection, particularly once cases enter the judicial phase.

Structural and procedural barriers further weaken identification. In **Italy**, fragmented data systems, lack of shared registration mechanisms, and weak inter-institutional communication delay identification. **Poland** faces similar fragmentation, with weak information-sharing between police, prosecutors, social services, and NGOs, as well as inconsistent screening practices at borders, foster care, and reception facilities. Confusion between migrant smuggling and trafficking further contributes to under-identification.

Judicial and prosecutorial dimensions also play a role. In **Greece**, under-identification at the prosecutorial level and delays in formal victim status recognition restrict access to protection and remedies. Limited territorial coverage of Child Houses means that child-friendly identification and interview practices are not consistently available, increasing the risk of secondary victimisation. In **Portugal**, despite a solid institutional framework, insufficient specialisation of prosecutors and judges, uneven application of safeguards, and coordination challenges between criminal and family courts can delay protective measures for child victims, particularly foreign children. Civil society organisations report that family courts are often unprepared to handle complex trafficking cases involving non-national children, leading to harmful outcomes.[9]

Alongside these gaps, the country reports also document **specific promising practices**, though often unevenly implemented and insufficiently scaled.

In **Belgium**, identification is supported by a structured indicator-based approach. Frontline professionals and judicial actors rely on a checklist of trafficking indicators contained in confidential prosecutorial circulars, combined with mandatory referral procedure once indicators are detected. Targeted tools respond to emerging risks, including an e-learning programme developed by civil society actor Child Focus to support the detection of online sexual exploitation of children. The Belgian report also highlights Human Rights Due Diligence as a mechanism with identification potential, illustrated by the Borealis case, where stronger scrutiny of recruitment and subcontracting chains could have enabled earlier detection of exploitation.

9 Judicial professionals noted that the coexistence of separate criminal and family court proceedings may, at times, hinder coordination and delay protective measures. Efforts by public prosecutors to uphold victims' rights were acknowledged, although the practical application of existing safeguards remains uneven across jurisdictions. Civil society organisations pointed to specific challenges faced by Family Courts in cases involving foreign child victims, particularly from West Africa and the Portuguese-speaking African countries, which can complicate decision-making processes. They highlighted the specific unpreparedness of the Family courts to deal with the cases and the victims, often leading to perceived wrong decisions and further harm to child victims.

In **Finland**, according to both academics and practitioners, a key promising practice lies in focusing on identifying and intervening in different types of abusive behaviour and violence. Experts stress that professionals do not need to determine conclusively whether a situation constitutes trafficking in order to act; identifying indicators of exploitation and intervening early to stop harm is prioritised. This approach is particularly relevant in complex cases involving overlapping forms of abuse.

In **Italy**, while major constraints remain, the systematic emergence of trafficking indicators during asylum procedures and the existence of specialised police units dealing with foreign criminality provide important–if limited–entry points for identification.

Poland has developed a structured and increasingly integrated use of AI tools to prevent and detect child trafficking and sexual exploitation, particularly in the online environment. A central element is law enforcement cooperation with Interpol's International Child Sexual Exploitation (ICSE) database, which uses AI-based hash-matching to rapidly identify known child sexual abuse material, flag new content, and support victim identification. At national level, the Dyżurnet.pl reporting platform operated by NASK applies automated triage systems to process large volumes of public reports, enabling faster prioritisation of high-risk cases and more efficient allocation of investigative resources. Polish authorities also deploy AI tools to monitor digital spaces, including social media, encrypted platforms, and the dark web, to detect indicators of grooming, online recruitment, and child sale. Complementary uses include image recognition and biometric comparison to identify victims across databases, as well as emerging predictive models that analyse migration, visa, criminal, and digital data to support risk-based, proactive policing.

In **Portugal**, practitioners report gradual improvements in coordination and professionalisation following institutional restructuring in the past decades. Continued training and strengthened cooperation among law enforcement bodies have reinforced investigative practices, indirectly supporting earlier identification. Additionally, practitioners reported being very satisfied with the clear and functional coordination and collaboration between institutions that is activated once a victim is identified. Despite this, there is widespread acknowledgment that the identification capacity was severely impacted by the dissolution of the Immigration and Border Services, whose teams (particularly in airports) were highly specialised and experienced. Frontline workers mentioned that the situation has not been regularised, given that those newly responsible are not as experienced and specialised.

Overall, the country reports point to a consistent pattern: victim identification is weakest where it depends on victim self-recognition, cooperation, or rigid procedural thresholds, and strongest where professionals are trained to recognise indicators, act on risk, and coordinate across sectors. Identification is more effective when viewed as a way to protect children, and not just as a tool for prosecution. Difficulties arise when systems are fragmented, specialisation is insufficient, and practices ignore children's needs.

3. Recommendations

- **Shift identification from victim self–disclosure to indicator–based professional assessment:** Given that children frequently do not recognise or disclose their exploitation, identification systems should prioritise observable risk indicators and professional judgment rather than cooperation, testimony, or self-identification by the child.

- **Strengthen trafficking-specific capacity at first–contact points:** General police patrols, border units, and reception-centre staff – often the first to encounter child victims – require practical, scenario-based training focused on trafficking indicators, particularly where exploitation is masked by behavioural issues or migration-related vulnerabilities.

- **Embed trafficking screening across child–facing systems, not only criminal justice:** Many children have repeated contact with schools, child welfare, health services, asylum bodies, and/or substitute care without being identified as victims of trafficking. This points to the need for systematic screening protocols within these settings, supported by clear notification and referral duties

- **Improve inter–agency data sharing and case–linking mechanisms:** Fragmented information systems and weak coordination between police, prosecutors, social services, and civil society organisations impede early identification and follow–up, especially for mobile or foreign children. Shared registration tools and standardised information–exchange protocols should be prioritised.

- **Decouple identification and protection from criminal proceedings and cooperation:** Delays in victim status recognition and conditional access to protection undermine identification and trust. Children should be identified and protected independently of their willingness or ability to participate in investigations.

- **Expand child–sensitive, specialised structures and territorial coverage:** Limited availability of child-friendly identification environments and specialised professionals restricts effective responses and increases the risk of secondary victimisation. Existing models should be extended beyond major urban centres.

- **Address complex and overlapping forms of exploitation in identification practice:** Professionals should be equipped to recognise trafficking where multiple abuses coexist (such as sexual exploitation, forced labour, neglect, and criminal activity), rather than treating exploitation categories in isolation.

- **Reduce institutional turnover and build sustained specialisation:** Routine rotation of personnel and insufficient specialisation among police, prosecutors, and judges weaken institutional memory and consistency in identification practices. Stable, specialised roles should be maintained in trafficking-related functions.

4. Practical tools

→ Camden Safeguarding Children Partnership (CSCP), List of indicators used to assist in the identification of victims of trafficking, including specific indicators for identifying cases of child trafficking and key questions to ask.

→ EASO's Practical guide on the best interests of the child in asylum procedures, including a template for a quick and comprehensive assessment of the child's best interests

→ IOM Guidance on Referral Mechanisms for the Protection and Assistance of Migrants Vulnerable to Violence, Exploitation and Abuse and Victims of Trafficking, including profiling forms for vulnerable migrants, a guide for conducting an interview and collecting information with special considerations for interviewing children

- OSCE's Survivor-Informed Indicators for the Identification of Victims and Survivors of Trafficking in Human Beings
- OSCE'S Uniform Guidelines for the Identification and Referral of Victims of Human Trafficking within the Migrant and Refugee Reception Framework in the OSCE Region
- UNICEF Identification of Victims/Persons 'At-Risk' of Trafficking in Human Beings
- UNICEF Reference Guide on Protecting the Rights of Child Victims of Trafficking in Europe, including a checklist for immigration officers (border officials) to assess whether a child is 'at risk' of being trafficked and guidelines for professionals conducting interviews with child victims of trafficking about possible crimes committed against them
- UNDOC's Toolkit to Combat Trafficking in Persons, including a Standardised checklist for identifying victims of human trafficking, guidelines for interviewing victims and a list how to conduct ethical and safe interviews with victims
- UNODC Standardised checklist to facilitate victim identification in trafficking cases
- Uncovering labour trafficking. Investigation tool for law enforcement and checklist for labour inspectors. This tool was developed in the EU-funded FLOW project with partner countries Bulgaria, Estonia, Finland and Latvia. The tool is also available in Bulgarian, Estonian, Finnish and Latvian languages and the reports have been tailored to the local context in close cooperation with national authorities.

Module 3 Protection

1. Key Frameworks

At the global level, the Palermo Protocol establishes the foundational contours of victim protection. It frames trafficked persons–explicitly including children–as rights holders entitled to privacy, safety, information, and recovery support. Protection is understood broadly, encompassing physical security, psychological and social recovery, access to housing, healthcare, education, and compensation. For children, the Protocol requires that age and special needs shape all protective measures, and that return or repatriation decisions be guided by safety and voluntariness rather than migration control imperatives. While the Protocol sets minimum standards, it leaves significant discretion to States in implementation, resulting in uneven procedural guarantees across jurisdictions.

Within the European Union, Directive (EU) 2024/1712 significantly strengthens protection measures for victims of trafficking, with particular attention to those in vulnerable situations, including children and victims in need of international protection. The Directive requires that assistance and protection be provided on a consensual and informed basis and guarantees minimum standards of living, including safe accommodation, material assistance, medical and psychological care, counselling, and access to interpretation and information services.

The Directive reinforces child–specific safeguards, requiring an individual assessment of each child's needs and circumstances and the provision of both short– and long–term support for physical and psychosocial recovery. This includes access to education, tailored reintegration measures, and transition–to–adulthood programmes aimed at preventing re–trafficking. Any measure constraining the liberty of children in order to protect them from trafficking should be strictly necessary, proportionate and reasonable to the aim of protecting the individual child. A guardian or representative must be appointed without delay once a child is identified, with mechanisms to address conflicts of interest, and assistance to the child's family should be provided where possible.

Children who are victims of trafficking must be able to effectively access international protection, with coordinated asylum and anti–trafficking procedures that reflect their vulnerability and ensure special procedural guarantees and appropriate reception conditions. Reporting procedures must be safe, confidential, and child–friendly, using age–appropriate language. Finally, child victims are entitled to access compensation schemes for victims of violent crime, reinforcing a protection framework that prioritises safety, recovery, and durable solutions for trafficked children.

These protections are reinforced and systematised by the Victims' Rights Directive (2012/29/EU), which applies across all serious crimes but is particularly relevant for trafficking. It introduces the obligation to carry out individual assessments to determine each victim's specific protection needs, with a strong presumption that child victims require special measures. The Directive embeds a child-sensitive approach across criminal proceedings, requiring authorities to take account of age, maturity, views, and vulnerabilities, and to actively prevent intimidation, retaliation, and repeat victimisation. In practice, many shortcomings observed in national systems (such as delays, insufficient child-friendly procedures, or inconsistent access to safeguards) relate directly to failures in implementing these procedural guarantees.

Where trafficking overlaps with sexual exploitation and online abuse, Directive 2011/93/EU further strengthens the protection framework. It recognises that harm caused to children in these contexts

is often severe, cumulative, and long-lasting, requiring assistance that may extend into adulthood. Protection is not limited to the child alone but may encompass non-offending parents or guardians, acknowledging the broader support environment necessary for recovery.

The EU Strategy on Combatting Trafficking in Human Beings (2021–2025) does not introduce new legal rights but provides a **coherent policy lens** through which protection obligations are to be implemented. It highlights persistent gaps in access to assistance, compensation, and long–term reintegration, and explicitly frames protection as a prerequisite for effective justice rather than its by-product. The Strategy emphasises child–centred responses, early appointment of guardians, cross-border referral mechanisms, and the need to move beyond crisis intervention toward sustainable solutions, including education, labour–market inclusion, and social integration. It also underscores that victims should not be penalised for offences committed under coercion and should be treated with dignity, without prejudice or bias.

Taken together, these instruments articulate a layered protection architecture grounded in three core principles. First, **protection is unconditional:** it must not depend on cooperation, immigration status, or procedural convenience. Second, **protection is individualised and child–sensitive**, requiring assessments that reflect the child's specific circumstances, vulnerabilities, and views. Third, **protection is longitudinal**, extending beyond immediate safety toward recovery, reintegration, and the prevention of re–victimisation. As with prevention and identification, the effectiveness of this framework ultimately depends not on formal transposition but on the capacity of national systems to translate these standards into coordinated, adequately resourced, and child–centred practice.

2. Gaps and promising practices

Across the eight country reports, protection systems for child victims of trafficking are formally in place but unevenly effective, with outcomes strongly shaped by the speed of victim recognition, the availability of specialised care, and the degree of coordination between child protection, criminal justice, migration, and social services. A central and recurring gap concerns the delay between first contact and effective protection, during which children remain exposed to harm.

In **Greece**, stakeholders consistently described how delays in formal victim recognition and the lack of legal status directly affect access to protection. Severe shortages in dedicated, child–appropriate placements for children originating from Greece and other EU countries further undermine protection: prosecutors reported that children may remain in hospitals for extended periods due to the absence of available spaces in protection facilities, particularly in Athens. Protection is also weakened by procedural bottlenecks–after-hours delays, repeated transfers between institutions, and technological failures in securing recorded evidence–which result in repeated questioning and heightened risks of secondary victimisation. Where multidisciplinary coordination is embedded, however, practice improves markedly. In Thessaloniki, stable inter–agency structures with known focal points and flexible arrangements for child–friendly interviews were cited as promising practices towards meaningful protection.

Greece – Domestic Child Sexual Exploitation Case (2022)

This case involves the domestic trafficking and sexual exploitation of a 12-year-old Greek girl from a highly vulnerable family background. Between April and July 2022, the child was subjected to prostitution, sexual abuse, and the production of child sexual abuse

material. The perpetrators were family acquaintances, including the mother's employer, who exploited the child's economic vulnerability and exercised control through threats and abuse of trust. The case was identified following a report by a relative and a formal complaint by the mother. The perpetrators were convicted at first instance.

The case highlights significant procedural and protection gaps. The child experienced secondary victimisation due to repeated testimonies, while the Child House model was not used, despite its role in preventing re-traumatisation. Psychological support was provided only after substantial delay. Moreover, the disclosure of the child's place of residence resulted in threats, pointing to serious shortcomings in confidentiality and safety measures.

Overall, the case underscores the need for early referral to child-friendly procedures, timely psychosocial support, and stronger safeguards to protect child victims throughout criminal proceedings.

Italy exhibits a structurally developed but highly uneven protection landscape. While a national network of victim assistance shelters exists, capacity for children is extremely limited, with only a small fraction of places designated for children. Unaccompanied foreign children are frequently placed in general asylum reception centres that lack specialised staff and child-sensitive protection mechanisms, increasing the risk of retraumatisation and re–exploitation. Fragmentation between anti–trafficking, asylum, and child protection systems further complicates access to appropriate care. Although the national action plan identifies children as a priority group, implementation remains slow and inconsistent. Protection often depends on project–based NGO initiatives and individual professional commitment rather than a uniformly applied national framework. Short funding cycles undermine continuity of care, particularly during critical transitions such as ageing out of care or return to countries of origin, while the speed and adaptability of trafficking networks frequently outpace institutional responses.

In **Portugal**, the legal framework for child protection is comparatively robust, but practice reveals significant shortcomings in tailoring protection to trafficked children.

Although Portugal operates a dedicated Shelter and Protection Center for Children and Young People Victims of Human Trafficking, its current capacity remains insufficient to meet the existing needs. Unaccompanied children are typically placed within the general child welfare system under procedures designed for children "at risk" which do not adequately address the specific vulnerabilities associated with trafficking. Family courts were described as insufficiently prepared to deal with foreign trafficked children, leading to decisions perceived by practitioners as harmful. Assisted return procedures vary widely depending on the origin country, with limited follow–up and protection guarantees outside Europe. Although safeguards such as statements for future reference exist to prevent repeated questioning, they are not consistently applied. In this context, NGO–led cross–border support often provides more reliable protection than formal state mechanisms. Another illustrative example of the gap between the legal framework and its implementation concerns access to residence permits for victims of trafficking. Despite a legal entitlement to residence permits for all identified trafficking victims in **Portugal**, access in practice remains constrained by administrative barriers. Requirements for standard identity documents–often unavailable to victims–and limited awareness among the Agency for Integration, Migration and Asylum and Social Security of trafficking-specific legal provisions mean that implementation depends heavily on interventions by the Judiciary Police, exposing a clear gap between law and practice.

Romania's protection system is centred on child protection directorates (DGASPC), which are formally responsible for supporting child victims. However, interviewed professionals reported limited availability of specialised services for trafficked children, particularly beyond the immediate phase of exploitation. Young people leaving foster care were repeatedly identified as a largely invisible and highly vulnerable group. Cultural barriers further weaken protection: reluctance to seek psychological support remains widespread, limiting recovery and reintegration. While NGOs play a role, awareness of specialised civil society services is low, and cooperation remains underdeveloped. Respondents highlighted the potential role of community actors, including the Orthodox Church, as an untapped resource for both protection and reintegration.

In **Bulgaria**, protection gaps are particularly evident in accommodation and safety arrangements. Crisis centres often lack adequate confidentiality and are not structurally adapted to the needs of trafficking victims, undermining victims' sense of security. Critically, there are no dedicated crisis centres for child victims of trafficking; children are housed together with victims of domestic violence, limiting the ability to provide tailored, trauma-informed care and increasing stress and conflict. These structural shortcomings compound earlier identification challenges and weaken longer-term recovery prospects.

Finland demonstrates comparatively strong principles of individualised, needs–based support, with practitioners emphasising trust–building and the restoration of a child's sense of safety as the foundation of protection. The National Referral Mechanism was introduced in 2025 in the form of a concrete handbook providing information and support to professionals. Furthermore, the Barnahus model represents a clear promising practice, offering coordinated, multidisciplinary responses that reduce retraumatisation and support both the children's immediate and long-term needs. At the same time, experts noted risks associated with institutional placements that may inadvertently increase vulnerability, as well as difficulties in restricting movement for children exposed to criminal control. A key concern raised across interviews was the fragility of low-threshold NGO services, which play a crucial role in reaching children who fear engagement with authorities but face funding cuts that threaten their sustainability.

In **Poland**, protection mechanisms are relatively structured in law and include tailored support plans, legal aid, and reintegration measures. In practice, however, protection remains reactive and uneven. Services for child victims–especially foreign or undocumented children–are rarely specialised, and legal representation is often delayed or provided by non–specialised *ex officio* lawyers. Fragmented data systems and weak inter–agency coordination mean that children frequently pass between institutions without consistent case tracking. NGOs fill critical gaps through legal aid, psychosocial support, and integration activities, but reliance on short–term funding limits continuity and coverage.

Belgium stands out for several promising practices in child protection. The flexible application of the reflection period for children is regarded as good practice, allowing time to stabilise children without pressure to cooperate. Clear referral procedures, mandatory reporting obligations, and the use of standardised indicators support more predictable access to protection. Efforts to engage families in countries of origin, particularly for children exploited in street-based criminal activities, have shown positive effects in certain cases. Two civil society centres for child trafficking victims, Meza and Esperanto, provide secure, confidential, and non-coercive environments, supported by multidisciplinary, individualised case management. While these centres play a central role in practice–receiving most child referrals–they are not formally recognised as specialised trafficking victim facilities. Support, provided in the centers, is widely regarded as highly efficient. However,

access remains limited: restrictive eligibility criteria, difficulties in severing contact with traffickers (particularly in cases involving trauma bonding or family ties), and children's reluctance to self–identify as victims exclude many from protection, even where support would be needed or appropriate.

3. Recommendations

- **Ensure immediate access to protection independent of formal victim recognition**

  Delays in official victim status leave children without access to healthcare, residence security, or safe accommodation. States should operationally decouple access to core protection measures from formal recognition, ensuring that children benefit from protection from the moment credible indicators of trafficking are identified.

- **Expand specialised, child-specific accommodation and avoid placement in general facilities**

  The shortage of child-specific placements results in children being housed in inappropriate settings such as general asylum centres, hospitals, or mixed domestic violence shelters. Dedicated, confidential, and child-adapted accommodation with trained staff should be scaled up to prevent retraumatisation and disappearance and protect.

- **Stabilise protection pathways through sustained funding**

  Project-based and short-term funding cycles undermine long-term recovery and reintegration. Protection systems should prioritise stable financing models that support continuous case management, especially during critical transitions such as ageing out of care or return to countries of origin.

- **Embed multidisciplinary coordination as standard practice, not exception**

  Where stable coordination mechanisms exist–such as the national assistance system and the Barnahus model in Finland or fixed inter–agency roundtables in Greece–protection outcomes improve significantly. These models should be institutionalised nationally, with clear focal points, shared protocols, and availability beyond office hours to reduce delays and repeated questioning.

- **Strengthen trauma–informed and child–sensitive practice across all frontline services**

  Repeated retellings of abuse, procedural delays, and overly technical approaches undermine protection. Mandatory, continuous training should focus on trauma–informed interviewing, child development, and complex vulnerabilities rather than solely legal or investigative skills.

- **Improve case tracking and information-sharing while safeguarding confidentiality**

  Fragmented data systems prevent effective monitoring and continuity of protection. Secure, interoperable case-tracking mechanisms should be developed to ensure that children do not fall through institutional gaps when moving between police, social services, courts, and reception systems.

- **Strengthen legal assistance and guardianship from the earliest stage**

  Limited access to specialised legal aid weakens children's ability to understand and exercise their rights. Early, child-specialised legal representation and consistent guardianship should be ensured throughout protection, asylum, and criminal proceedings.

- **Support and integrate civil society as core protection actors, not auxiliary providers**

  Across all countries, civil society provides critical low-threshold, trust-based, and cross-border support–often compensating for state gaps. Their role should be formally embedded within protection systems, with predictable funding and defined responsibilities, rather than reliance on *ad hoc* or humanitarian resources.

- **Address hidden vulnerabilities during and after formal protection**

  The reports highlight high-risk groups that remain insufficiently protected, including children leaving care, unaccompanied children, and children in institutional settings. Protection frameworks should explicitly extend follow-up and reintegration support beyond immediate crisis phases to reduce risks of re-trafficking.

- **Strengthen and streamline the national referral mechanism, with a dedicated focus on children**

  National referral mechanisms should be accessible, concise, and easy to navigate, with clearly defined roles, competencies, and expectations for all sectors involved. A child-specific component should be explicitly included, and effective dissemination ensured so that the mechanism reaches all relevant stakeholders, including at community level, to support consistent implementation across local contexts.

4. Practical tools

- IOM Guidance on Referral Mechanisms for the Protection and Assistance of Migrants Vulnerable to Violence, Exploitation and Abuse and Victims of Trafficking, including "Identification to reintegration of victim: Flow diagram of the TACT project", developed to coordinate the return and reintegration of victims of trafficking

- IOM's The Mental Health Aspects of Trafficking in Human Beings: A Set of Minimum Standards. The standards aim to help the implementation of comprehensive and coordinated psychosocial care of trafficked persons from the time of their rescue to throughout their reintegration process.

- "Long Journey": Toolkit for Supporting Victims of Forced Marriage, developed in the EU-funded project EASY

- UN Office on Drugs and Crime's Toolkit to Combat Trafficking in Persons, including a checklist for guiding the return and reintegration process for women and children (identification, family tracing, family assessment, etc.), specific tools and guidelines for the repatriation of children, risk assessments on returning children to their home

- UNICEF Reference Guide on Protecting the Rights of Child Victims of Trafficking in Europe, including guidelines on determining whether a return to family and/or country of origin is in the child's best interests

Module 4 Prosecution

1. Key Frameworks

At the international level, the Palermo Protocol provides the foundational criminal law framework by requiring the criminalisation of trafficking in persons, including attempt, participation, and organising. For children, the framework is deliberately simplified: proof of coercive means is not required, and consent is legally irrelevant. This lowers evidentiary thresholds and places responsibility squarely on investigative and prosecutorial authorities to build cases without relying on a child's capacity to articulate exploitation. The Protocol further situates prosecution within a broader obligation to protect victims' privacy, safety, and ability to participate meaningfully in proceedings.

The Convention on the Rights of the Child and its Optional Protocol reinforce this approach by reframing trafficked children as rights holders within criminal proceedings. Prosecution must be guided by the best interests of the child and designed to prevent secondary victimisation. This shifts the focus from extracting testimony to ensuring procedural fairness, child-sensitive evidentiary practices, and the appointment of appropriate representatives where parental interests conflict with those of the child.

Within Europe, the Council of Europe Convention on Action against Trafficking in Human Beings operationalises these principles by requiring proactive investigations and prosecutions that are not dependent on victim cooperation. It introduces detailed procedural expectations, including child-adapted interviews, limitations on repeated questioning, and safeguards during trials. Importantly, it reinforces the obligation to pursue financial investigations and organised crime structures, recognising that child trafficking prosecutions often fail when confined to low-level perpetrators or isolated incidents.

At EU level, Directive 2011/36/EU, as amended by Directive (EU)2024/1712 constitutes the core prosecutorial instrument. It harmonises trafficking offences across Member States, explicitly requiring that investigations and prosecutions be effective, proportionate, and dissuasive, while also recognising the specific evidentiary and procedural challenges posed by child victims. A central prosecutorial principle embedded in the Directive is that proceedings must not depend on victim cooperation. Authorities are required to initiate and pursue cases based on reasonable grounds, allowing prosecutions to proceed even where children are unwilling, unable, or too traumatised to testify.

For child victims, evidentiary practices are adapted to reduce harm, including limits on the number of interviews, the possibility of video–recorded statements, and measures to avoid direct confrontation with defendants. These provisions directly shape prosecutorial strategy by encouraging early, high–quality evidence collection and reducing reliance on repeated oral testimony in court.

Importantly, the Directive expands protections for victims of trafficking by ensuring that they cannot be prosecuted or penalised for all unlawful acts committed as a direct result of their exploitation, including criminal, administrative, or regulatory offences such as prostitution, begging, loitering, or undeclared work. This measure aims to encourage victims to report crimes and seek support without fear of legal consequences. Member States are required to train law enforcement, prosecutors, and relevant authorities to implement these non-prosecution provisions effectively, including in cases where offences involve information and communication technologies. Authorities are encouraged to create specialised units with the expertise and technological capacity to handle trafficking cases.

This prosecutorial framework is reinforced by the Victims' Rights Directive (2012/29/EU), which introduces mandatory individual assessments to identify protection needs, presumes heightened vulnerability for child victims, and requires measures to prevent intimidation, retaliation, and repeat victimisation. In practice, this constrains prosecutorial discretion by requiring early planning of evidentiary strategies that minimise harm, rather than relying on repeated in–court testimony.

Where trafficking intersects with sexual exploitation, Directive 2011/93/EU further strengthens prosecutorial obligations by recognising the long–term impact of harm and requiring assistance and procedural safeguards that may extend into adulthood. This is particularly relevant for cases where proceedings are prolonged or where delayed disclosure is common.

Finally, the EU Strategy on Combatting Trafficking in Human Beings (2021–2025) frames prosecution as part of a systemic response that links early identification, protection, and accountability. It explicitly acknowledges persistent failures in converting identification into successful prosecutions and calls for child–sensitive, victim–independent investigations, strengthened judicial cooperation, and specialised training for prosecutors and judges. The Strategy emphasises that effective prosecution depends not only on legal definitions, but on coordination, resources, and the ability to integrate protection considerations throughout criminal proceedings.

Taken together, the framework defines prosecution of trafficking in children as a state–driven, evidence–led process, anchored in child rights and designed to operate independently of a child's willingness or ability to testify. Effectiveness is measured not solely by convictions, but by the capacity of criminal justice systems to hold perpetrators accountable without reproducing harm to the child. The challenge for national systems lies in translating these layered obligations into coherent, child–sensitive prosecutorial practice.

2. Gaps and promising practices

Across the eight countries reviewed, the prosecution of child trafficking is shaped by a common structural tension: while legal frameworks broadly comply with international and EU standards, cases continue to reach prosecutors late, evidence is often fragile, and child-centred procedural safeguards are applied unevenly across territories and institutions.

In most contexts, child trafficking cases enter the criminal justice system only once exploitation becomes visible or acute. Law enforcement, border controls, asylum procedures, or NGO outreach remain the primary points of detection. Systematic referrals from schools, hospitals, paediatric services, or social welfare actors are rare, despite these services being well placed to identify early indicators of exploitation. This reactive pattern was consistently reported in **Greece, Poland, Finland, Bulgaria** and **Italy**, and it significantly limits the scope of investigations. By the time a prosecutor becomes involved, exploitation has often been ongoing for months or years, and opportunities to secure corroborating evidence have already been lost.

Although national legislations generally state that victim identification should not depend on cooperation with law enforcement, this principle is not consistently realised in practice. In **Greece**, delays in formal recognition of victim status at the prosecutorial stage frequently restrict access to protection measures and procedural rights. In **Finland**, particularly in cases involving migrant or asylum–seeking children, the reluctance to file a criminal complaint – and more often, a lack of information and evidence of a crime that has taken place abroad – often results in no pre–trial investigation being opened at all, even where credible indicators of trafficking exist. This disconnect

between protective identification and criminal procedure continues to act as a gatekeeping mechanism, limiting prosecutorial engagement in complex child trafficking cases.

Finland – Child Sexual Exploitation: Delayed Disclosure and Long-Term Harm (2025)

In June 2025, the Lapland District Court convicted a woman born in 1999 of aggravated human trafficking committed while she was a minor, in connection with sexual exploitation of two underage girls in 2016. She received a suspended prison sentence and was ordered to pay compensation to the victims. Two adult sex buyers were also convicted of aggravated child sexual abuse and ordered to pay damages. The court additionally found that the proceedings had been excessively delayed and awarded state compensation for the violation of the victim's right to a timely trial.

The court established that the victims suffered long-term psychological harm, including depression, anxiety, sleep disturbances, and impaired ability to trust others, requiring medication and therapy. The case illustrates how minors may remain silent about exploitation for years due to fear, shame, guilt, and threats of exposure, as well as confusion about their own criminal liability. It also highlights that children may not initially recognise themselves as victims, especially when exploitation involved apparent "consent," often disclosing abuse only in adulthood.

Evidence collection remains one of the most difficult elements of prosecution. Across multiple countries, practitioners described persistent delays in conducting child–friendly interviews, shortages of trained psychologists and interpreters, and repeated questioning of children due to procedural or technical shortcomings. Outside major urban centres, these problems are especially acute. In **Greece**, the limited territorial coverage of Child Houses undermines the consistent use of a single, recorded interview and the assessment of the individual protection needs of the child victim, increasing the risk of secondary victimisation and weakening the evidentiary chain. Similar challenges were reported in **Italy**, where child–sensitive safeguards including pre-trial video-recorded interviews, protective anonymity measures, and the involvement of child psychologists during questioning exist in law but are not systematically applied in practice. **Belgium** has developed a promising practice in the form of specialised TAM (Testimony by Audiovisual Means) hearings, conducted in a child-sensitive manner and are audiovisually recorded to avoid repeated questioning. Each interrogation follows a structured methodology consisting of five phases, which together comprise 11 steps. However, practitioners have noted that TAM hearings can at times be overly open-ended, which may hinder effective questioning when a minor is unwilling or unable to speak. The increasing digitalisation of trafficking has further complicated investigations. Prosecutors and law enforcement officers in **Belgium, Finland, Italy** and **Greece** reported that traffickers increasingly rely on encrypted messaging applications, cloud–based storage and disappearing messages, leaving investigators dependent on complex digital traces. While new analytical tools are becoming available, there is insufficient training and staffing to process large volumes of seised data in a timely manner. Prosecutors often cannot access digital material directly and must rely on intermediaries, slowing proceedings and increasing the likelihood that key evidence will be missed or become unusable.

Financial investigations are similarly underdeveloped. In most countries, cases tend to stop at the immediate exploitation stage, with limited tracing of profits, assets or network structures. Mapping financial flows, linking incidents across regions and pursuing organisers abroad remain inconsistent

and heavily dependent on local capacity and resources. This is particularly evident in cases involving forced begging, labour exploitation or family–based trafficking, where proving benefit beyond the visible act of exploitation is more challenging.

The treatment of child victims within criminal proceedings varies considerably. Where child-friendly safeguards are applied as intended, they are widely seen as effective. Recorded interviews conducted by trained professionals reduce re-traumatisation and allow testimony to be used later in court, even if the child disengages from proceedings. Delays, repeated questioning and poor communication about the progress of proceedings were frequently cited by NGOs and service providers as sources of stress and disengagement for child victims.

Across several jurisdictions, prosecutorial decision–making is influenced by structural disincentives. In **Bulgaria** and **Finland**, stakeholders noted that trafficking charges are perceived as complex, resource-intensive and uncertain in outcome, particularly when compared to sexual offence charges that are easier to prove and carry higher or more predictable sentences. As a result, cases involving children are sometimes prosecuted under alternative offence labels, preventing courts from examining the trafficking elements and contributing to under–recognition of child trafficking in case law.

In **Poland** performance metrics of the judicial system reward speed over complexity, discouraging in–depth investigations and many cases collapse due to missing evidence, unstable guardianship, or inconsistent victim support.

Portugal stands out as the only country reporting systemic challenges linked to the parallel handling of child trafficking cases through separate criminal and family and juvenile proceedings. Practitioners report persistent coordination gaps between these processes and their respective actors, which can result in protective or procedural measures in one track undermining those in the other. These challenges are further compounded by a limited capacity within family courts to respond effectively to child trafficking cases and to ensure adequate protection of presumed child victims. Concerns were also raised about the breadth and lack of specificity of the current legal framework, prompting calls for a clearer legislative regime on human trafficking, a special protection status for child victims, and more precise regulation of the use of technological means. Greater specialisation of prosecutors and judges, particularly within criminal and family jurisdictions, was identified as key to strengthening the institutional response. Low conviction rates remain a persistent concern. **Greece, Italy** and **Finland** report that only a fraction of cases with presumed child victims ultimately lead to trafficking convictions. High burdens of proof, evidentiary weaknesses, inconsistent judicial interpretation of trafficking elements and limited judicial specialisation all contribute to this outcome. In several countries, the absence of centralised and disaggregated judicial statistics on trafficking prosecutions further limits the ability to assess performance, identify systemic bottlenecks or evaluate the impact of reforms.

The Belgian “Cyber Prostitution” Pilot

In 2024, the Belgian Federal Police launched a pilot initiative on “cyber prostitution” to strengthen the detection of online sexual exploitation, including cases involving minors. The pilot relied on a specialised OSINT tool, officially procured at significant cost, and was implemented over a six-month period.

During this time, police identified 125 prostitution-related websites in Belgium, of which 21 were selected for active monitoring. The tool captured around 17,000 online advertisements, many duplicated across platforms but collectively indicating a large population potentially at risk.

Analysis of this data led to the identification of 112 suspected cases involving minors. This intelligence was then shared with local police units, enabling targeted checks and the opening of investigations to assess whether trafficking or sexual exploitation was occurring.

Despite these challenges, promising practices emerge where prosecution is embedded in a broader, coordinated response. Early and active involvement of prosecutors in investigation planning strengthens evidence preservation and aligns investigative steps with child protection measures. **Poland**'s detailed AI-driven identification algorithms, **Romania**'s mandatory involvement of child protection authorities from the first statement, **Finland**'s harmonised investigation model (Ihmemalli) and handbook for the investigation of trafficking cases, and **Belgium**'s proactive use of an OSINT (open-source intelligence tool) illustrate how institutional specialisation can improve outcomes. At local level, multisectoral cooperation platforms, such as those reported in parts of **Italy**, have helped bridge gaps between prosecutors, law enforcement and civil society actors. In **Bulgaria** "Protection Zone" Advocacy and Support Centre for Children in Sofia, run by the Animus Association, operates under the Barnahus model and provides integrated legal, medical, psychological, and social support through child–friendly procedures and specially trained staff. Building on this model, a joint project underway of the Ministry of Justice, UNICEF Bulgaria, and the Institute for Social Activities and Practices aims to establish eight additional centres nationwide, alongside an existing network of 71 child-friendly interview rooms ("blue rooms").

3. Recommendations

- **Decouple the initiation of criminal investigations from victim cooperation in practice, not only in law:** States should introduce binding prosecutorial guidance requiring the opening of pre-trial investigations where credible indicators of child trafficking exist, regardless of the child's willingness or ability to cooperate. This is essential to align prosecutorial practice with the child-centred and non-punishment principles already embedded in the legal framework.

- **Mandate early and continuous prosecutorial involvement in child trafficking cases:** Prosecutors should be formally involved at the earliest investigative stage to guide evidence collection, digital seizure, and child-sensitive procedural planning. Early engagement reduces evidentiary loss, limits repeated interviews, and increases the likelihood that trafficking elements are preserved through to trial.

- **Ensure nationwide, timely access to child–friendly interview mechanisms:** Recorded, single interviews conducted by trained professionals (e.g. Child House/Barnahus/TAM-type models) should be available across all regions and outside office hours. Procedural safeguards designed to prevent re-traumatisation must be operationally accessible, not territorially or temporally limited.

- **Strengthen prosecutorial capacity to investigate digital and online–facilitated child trafficking:** Specialised training, technical staffing and direct prosecutorial access to digital

forensic tools are needed to address encrypted communication, online recruitment and evidence stored across platforms. Without this, prosecutions will continue to lag behind evolving trafficking methods.

- **Integrate financial investigations as a standard component of child trafficking prosecutions:** Law enforcement and prosecutors should be required to systematically trace profits, assets and control mechanisms in child trafficking cases. This includes the routine use of financial intelligence, asset seizure and cross-border cooperation to move beyond prosecuting isolated acts of exploitation.

- **Reduce reliance on alternative offence qualification where trafficking indicators are present:** Clear prosecutorial guidance and judicial training should discourage the routine downgrading of child trafficking cases to other offences for reasons of convenience or perceived evidentiary strength. Misclassification undermines accountability, distorts data and weakens deterrence.

- **Institutionalise multidisciplinary cooperation through formal case–tracking mechanisms:** Fragmented information flows between police, prosecutors, child protection authorities and NGOs should be addressed through secure, shared referral and case-tracking systems. This would support continuity of evidence, reduce duplication and ensure that protection and prosecution progress in parallel.

- **Improve judicial specialisation and consistency in the adjudication of child trafficking cases:** Targeted training for judges on trafficking elements, child psychology and evidentiary assessment is needed to address inconsistent interpretations and high acquittal rates. Specialisation contributes to legal certainty and strengthens confidence in prosecution outcomes.

- **Strengthen data collection and transparency on child trafficking prosecutions:** States should establish centralised, disaggregated statistics covering investigations, prosecutions, convictions and case attrition in child trafficking cases. Reliable data is necessary to assess effectiveness, identify systemic bottlenecks and inform evidence-based reforms.

4. Practical tools

- → Barnahus Network's Barnahus Quality Standards
- → CBSS' Child Protection mapping: Outlining challenges and good practices in Barnahus supportive role to child protection
- → CBSS & Marie Cederschiöld University's Checklist for collaboration between services for child protection and other agencies within Barnahus
- → Council of European Union's Handbook on trafficking in human beings - indicators for the investigating police forces
- → EASO practical training modules on trafficking in human beings, interviewing children & age assessment

- Eurojust's Joint Investigation Teams: Practical Guide
- Finnish Ministry of Justice's Best Practices for Combating Trafficking in Children and Young People and for Identifying and Supporting Victims: Report on countries in the Baltic Sea region
- Frontex's VEGA Handbook:Children at airports
- Frontex's VEGA Handbook: Children at land borders
- HEUNI's Handbook for forensic child interviews in presumed cases of trafficking
- Interpol's International Child Sexual Exploitation database
- UNDOC's Toolkit to Combat Trafficking in Persons, including prosecutor-oriented modules (case planning, evidential interviewing, witness protection, digital evidence, trafficking typologies) that guide criminal investigations and courtroom preparation in child cases
- OSCE Resource Police Training Guide: Trafficking in Human Beings
- Uncovering labour trafficking. Investigation tool for law enforcement and checklist for labour inspectors, developed within the FLOW project with partner countries Bulgaria, Estonia and Latvia. The tool is also available in Bulgarian, Estonian, Finnish and Latvian languages and the reports have been tailored to the local context in close cooperation with national authorities.

Module 5 Partnership-Building

1. Key Frameworks

At the international level, this approach is anchored in the Palermo Protocol, which frames cooperation as one of its core purposes alongside prevention and victim protection. The Protocol explicitly links the protection and recovery of victims in general and particularly children to cooperation not only between States, but also with non-governmental organisations, civil society, and specialised service providers. Assistance measures such as housing, counselling, medical and psychological care, education and training are conceived as inherently multi-actor processes, requiring coordination across public authorities and non-state actors. The Protocol further embeds partnership into prevention, requiring States to cooperate bilaterally and multilaterally to address structural vulnerabilities such as poverty, inequality and lack of opportunity, and to reduce demand for exploitative services. Even in the area of law enforcement, cooperation is central: training of police, immigration and border officials is explicitly linked to human rights, child-sensitive approaches, and collaboration with civil society, while strengthened communication between border authorities is identified as a necessary preventive measure.

The Convention on the Rights of the Child reinforces this cooperative logic from a child-centred perspective. While not trafficking-specific, it situates international cooperation as an essential means of improving States' capacity to protect children from harm and support their recovery. It emphasises the exchange of information, expertise and good practices in medical, psychological and social care, with particular attention to children in vulnerable situations. This framework implicitly requires that responses to child trafficking be embedded within broader child protection systems and coordinated across sectors and borders, rather than confined to criminal justice responses alone.

The Council of Europe Convention on Action against Trafficking in Human Beings translates these principles into more concrete coordination obligations. It explicitly recognises trafficking as a phenomenon that cuts across policy domains and institutional mandates. States are required to establish or strengthen national coordination between all bodies involved in prevention and combatting trafficking, including social services, law enforcement, migration authorities, judicial bodies, administrative agencies, NGOs and other civil society actors. This coordination requirement reflects the Convention's understanding of trafficking as a dynamic, often transnational activity carried out by adaptive and mobile criminal networks. As such, effective responses depend not only on coordination at national level, but also on sustained international cooperation that extends beyond criminal investigations to prevention and victim protection. Border management and cooperation between border authorities are highlighted as critical points of intervention, particularly in the context of transnational child trafficking, while respecting freedom of movement and other international obligations.

At European Union level, Directive (EU) 2024/1712 builds on the cooperative and multi-disciplinary framework established by Directive 2011/36/EU, reinforcing and expanding coordination at both national and EU levels. It formalises the role of national anti-trafficking coordinators and emphasises systematic collaboration with civil society, independent bodies, and the private sector, including IT and telecom companies, to enhance prevention, early detection, and reporting of trafficking. The Directive introduces mandatory, harmonised annual data collection and reporting to the Commission, ensuring evidence-based policies and enabling trend analysis. At EU level, Member States shall facilitate the tasks of an EU anti-trafficking coordinator, which shall ensure coordination with national anti-trafficking coordinators or equivalent mechanisms, independent bodies, Union agencies, and with relevant civil society organisations active in the field.

The Directive 2012/29/EU, complements this architecture by focusing on cooperation as a means of ensuring effective access to rights. It requires Member States to facilitate cooperation aimed at exchanging best practices, consulting in individual cases and supporting European networks working on victims' rights. For children and other groups at heightened risk of secondary victimisation, coordinated awareness-raising and prevention measures are envisaged as a shared responsibility between public authorities and civil society.

Finally, Directive 2011/93/EU on sexual abuse and sexual exploitation of children reinforces the importance of coordination in jurisdiction and prosecution, particularly in cases involving cross-border and online offences. By establishing broad jurisdictional rules and removing procedural barriers such as dependence on victim complaints or double criminality, the Directive facilitates coordinated prosecutions across Member States. It explicitly recognises that offences committed through information and communication technologies require cross-border cooperation and alignment of investigative and prosecutorial approaches. Prevention and awareness–raising, again, are framed as cooperative actions involving civil society and other stakeholders.

Taken together, international and EU–level frameworks conceptualise partnership building in anti–trafficking as a multi–layered obligation that combines policy coordination with operational cooperation. Child trafficking is consistently framed as a phenomenon that cannot be addressed through isolated institutional action, but requires structured collaboration between criminal justice authorities, child protection systems, migration governance, labour inspection and civil society actors. Crucially, these frameworks draw a clear distinction between mechanisms designed to align policy, monitor implementation and set common priorities, and those intended to support concrete, case–based cooperation across borders and sectors. This distinction is reflected in the institutional architecture that underpins anti–trafficking action, which ranges from policy–oriented coordination bodies to operational agencies and information–sharing systems directly involved in the identification, investigation, protection and prosecution of child trafficking cases.

Policy-level coordination and standard-setting

At the international level, UNODC functions as the central policy and capacity–building body supporting implementation of the Palermo Protocol, including guidance, indicators, and training materials relevant to child trafficking. UNICEF complements this role by shaping child–centred prevention and protection policies, while the ILO provides normative and policy guidance on forced child labour and exploitation in labour markets and supply chains. These organisations primarily enable cooperation by establishing common standards, promoting child-sensitive approaches, and supporting national system development rather than intervening in individual cases.

Within the Council of Europe, GRETA plays a key coordination and accountability role through independent monitoring of States' compliance with anti–trafficking standards, including child-specific safeguards. Its work strengthens cooperation indirectly by identifying systemic weaknesses, encouraging inter–institutional coordination, and reinforcing the role of national referral mechanisms. The Committee of the Parties follows up politically on these findings, further anchoring cooperation at policy level.

At the European Union level, policy coordination is driven by the EU Anti–Trafficking Coordinator, who ensures coherence across EU institutions, agencies, and Member States and keeps child trafficking visible within broader security, migration, and victims' rights agendas. National Rapporteurs or Equivalent Mechanisms support this coordination function by collecting data, analysing trends, and

feeding evidence into national and EU–level policy development. These actors shape the strategic environment in which cooperation takes place but do not engage directly in investigations or victim case management.

Operational cooperation and case-based assistance

Alongside these policy–oriented bodies, a distinct set of organisations and systems enables practical cooperation in concrete trafficking cases, including those involving children.

As a frontline actor at EU external borders, Frontex supports Member States in the early detection of potential trafficking victims, including children, by training border guards, providing risk–profile tools and manuals, and participating in joint operations aimed at spotting and referring vulnerable individuals. Through these activities – conducted in coordination with national authorities and other EU agencies – effective cooperation can enable timely referral to national protection systems and reduce the likelihood that trafficked children go undetected during border and migration procedures.

At the investigation stage, INTERPOL and Europol play complementary roles in supporting cross-border cooperation in child trafficking cases. INTERPOL provides a global law-enforcement platform, enabling cooperation beyond the European Union and facilitating information exchange with third countries through its worldwide network of National Central Bureaus. Its tools, such as international notices, diffusion alerts and global criminal databases, are particularly relevant in child trafficking cases involving non-EU origin, transit or destination countries, missing children, or transnational networks operating across multiple continents. By contrast, Europol functions as the European Union's central hub for operational police cooperation, offering specialised analytical support, intelligence coordination and real-time information exchange among Member States. Europol's added value lies in its capacity to identify cross-border patterns, link investigations across jurisdictions, launch Joint Task Forces[10] and support coordinated actions such as Joint Action Days. In practice, child trafficking cases frequently rely on both systems: INTERPOL enables the initial international alerting and outreach beyond the EU, while Europol consolidates intelligence within the Union, supports operational planning and strengthens judicial follow-up in close cooperation with Eurojust. Eurojust plays a central role in addressing child trafficking by enabling structured judicial cooperation across borders. It supports national prosecutors and judicial authorities in identifying links between cases in different jurisdictions, coordinating investigative and prosecutorial strategies, and resolving conflicts of jurisdiction. Through this coordination, Eurojust helps prevent further victimisation of children while strengthening the effectiveness of prosecutions against trafficking networks.

The cooperation between these agencies is facilitated by operational information systems such as the Schengen Information System (SIS), which allows authorities to issue and consult alerts on missing or trafficked children, suspects, and persons at risk and ECRIS, which supports the exchange of criminal records, helping prosecutors assess recidivism and organised criminal involvement across borders. These tools are critical for continuity and risk assessment in child-trafficking cases, particularly where victims or perpetrators move between Member States. These instruments are complemented by the European Multidisciplinary Platform Against Criminal Threats (EMPACT), which provides the strategic and operational framework for joint action against serious and organised

10 Such as Joint Liaison Task Force Migrant Smuggling and Trafficking in Human Beings (JLT-MS) for combatting criminal networks involved in human trafficking and migrant smuggling and Operational Taskforce GRIMM for tackling the 'violence-as-a-service' and the recruitment of young perpetrators into serious and organised crime.

crime, including trafficking in human beings. Through EMPACT, Member States, EU agencies, and relevant partners align priorities, share intelligence, and carry out coordinated operational activities targeting trafficking networks, with a specific focus on those exploiting children. Together, these mechanisms are critical for ensuring continuity, risk assessment, and coordinated responses in child-trafficking cases, particularly where victims or perpetrators move between Member States.

2. Gaps and promising practices

Across the country reports, partnership building emerges as a cornerstone of effective responses to child trafficking, yet one marked by a persistent gap between formal coordination frameworks and day-to-day operationalised practice. Most countries have established multi–agency structures, but their impact depends heavily on how far cooperation is institutionalised, operational, and sustained beyond individual commitment or project cycles.

National cooperation

At national level, several countries have already invested in formal coordination architectures designed to bring together law enforcement, prosecution, child protection services, migration authorities, and civil society. **Belgium, Bulgaria, Finland, Greece, Romania** and **Portugal** illustrate comparatively strong structural frameworks through their National Referral Mechanisms (NRMs), which formally define roles, procedures, and pathways for identification, referral, and assistance of child victims. **Romania**'s MNIR and **Bulgaria**'s NRM are consistently described as functioning multidisciplinary systems, particularly valued for their clarity in referral procedures and their inclusion of NGOs alongside state actors. **Greece**'s NRM similarly provides a shared procedural basis, supported by standard operating procedures, training, and a helpdesk, and is widely recognised by stakeholders as the central coordination tool–even if its full coordinating potential remains underused in practice. **Portugal**'s National Referral System includes nine practical tools designed to help professionals identify and respond to child trafficking cases, including indicators for risk assessment and referral guidelines. Similarly, in **Finland** the NRM was released in 2025 in the form of a concrete handbook with additional e-learning materials, which provide information and support to different actors in the identification and assistance of victims of human trafficking. One of the main issues **Italy** is still facing in the implementation and enforcement of anti-trafficking measures is the lack of a unified and comprehensive NRM that addresses all forms of child trafficking. Although sectoral mechanisms exist, a standardised, nationwide framework for the identification, referral and protection of trafficked children is still missing. Similarly, **Poland** reports, that the absence of a unified NRM and fragmented data collection among the Police, Border Guard, and National Prosecutor's Office leads to limited amount of comprehensive statistics on child trafficking.

A particularly strong promising practice in **Greece** is the National Emergency Response Mechanism (NERM) for unaccompanied children, which facilitates cooperation in urgent, high-risk situations. Its effectiveness lies in clearly defined, rapid communication between police, social services, NGOs conducting street outreach, and accommodation providers, enabling swift protective responses.

In **Belgium**, while the ICU and the Bureau provide a structured forum for policy alignment and information exchange, the country's federal structure continues to complicate effective coordination. Although general awareness of human trafficking has increased and intersectoral cooperation does occur, efforts remain fragmented and are often organised on an ad hoc basis by the actors involved rather than being formally coordinated or mandated. Progress is being made, but at a slow pace. In this context, the forthcoming Circular on multidisciplinary cooperation, provided it is effectively

disseminated and well known among professionals, is viewed as a welcome reform that could clarify roles and strengthen interagency collaboration in the protection of child victims. Promising practices nevertheless emerge at operational level, including joint databases used by specialised centres, targeted protocols such as those developed by Child Focus for missing children and regular meetings between reference prosecutors and police. **Portugal** presents a similar promising practice through the semi-annual meetings of the Extended Group on Human Trafficking, organised by the Observatory on Trafficking in Human Beings (OTSH), which brings together representatives from justice, law enforcement, health, labor, education, immigration, and civil society organisations, creating a space for information sharing, monitoring national policies, evaluating implemented measures, and defining strategies to strengthen the response to human trafficking. **Portugal** also operates at a regional level through five regional networks that implement regular meetings and activities in collaboration with public actors and civil society, which were assessed as effective and successful at the local level.

Poland similarly demonstrates a strong formal architecture–inter-ministerial and regional teams, specialised prosecutorial mechanisms–yet cooperation remains fragmented in practice. Stakeholders describe uneven implementation across regions, weak information continuity when children move between institutions, and the absence of shared case–management systems. Civil society organisations play a crucial bridging role through referrals, emergency support, and training, but their involvement is largely informal and project-based, limiting sustainability.

Across countries, a recurring challenge is the reliance on personal contacts rather than standardised procedures. This flexibility can enable rapid problem-solving, particularly in smaller jurisdictions or urgent cases, as described in **Greece** and **Belgium**, but it also creates vulnerability to staff turnover, geographic disparities, and loss of institutional memory. High staff turnover, limited resources, and the lack of joint, cross-sectoral training further undermine consistent cooperation. Shared digital platforms and interoperable databases are repeatedly identified as missing but critical tools to reduce duplication, prevent re-traumatisation of children, and ensure continuity of care.

Cross-border cooperation

Given the transnational nature of child trafficking, cross-border cooperation is essential, yet unevenly developed across the countries reviewed. **Bulgaria** and **Romania** stand out for their engagement in international and regional mechanisms. They use Europol, Eurojust, INTERPOL, Frontex, EMPACT, Joint Investigation Teams, and bilateral agreements, particularly with destination countries and neighbouring states along trafficking routes. These structures enable early intelligence sharing, coordinated investigations, and more coherent victim referral and repatriation processes, including through participation in Transnational Referral Mechanisms. Notably, in 2024, **Bulgaria** participated in Operation Global Chain, coordinated by **Romania**. The operation culminated in 219 arrests and the identification of 1,374 potential victims – including 153 children – across 39 countries (including **Belgium, Finland, Greece, Poland, Portugal** and **Romania**). Intelligence gathered in the field was systematically cross-referenced with Interpol databases, and liaison officers engaged in real-time coordination at an international operations center, thereby streamlining the flow of information and reinforcing transnational investigative efforts.

Belgium also demonstrates strong engagement at EU and international level, particularly through Europol, Eurojust, EMPACT action days, and operational task forces coordinated by the Federal Judicial Police. **Good** practices include the use of SIENA and SIS for information exchange, operational task forces linking multiple jurisdictions, and cooperation with international organisations such as

IOM for victim reintegration. IOM also assists Belgian victims who have been exploited abroad and wish to return home, but this assistance is not financed by the Belgian government. Collaboration with centers for victims in other countries is infrequent but generally effective when it does occur. Launched in 2019, the Koutcha Project was a 4.5-year collaboration between KOUTCHA (France), ESPERANTO (Belgium), and ECPAT France aimed at transferring the expertise of the Esperanto centre to support the establishment of a specialist centre in France. The project also included a Europe-wide webinar and the development of a practical guide to support the replication of Esperanto–type centres in other countries. **Italy**'s international cooperation on trafficking is also anchored in EU-level mechanisms, including Europol, Interpol, Eurojust, EMPACT, and Joint Investigation Teams. This framework is complemented by bilateral and multilateral agreements with key countries of origin and transit–such as Nigeria, Albania, Romania, and Tunisia–which facilitate joint risk assessments, and the deployment of liaison officers, though, according to GRETA their implementation and impact on child protection remain uneven. **Poland** and **Greece** actively participate in EU-level cooperation frameworks, including EMPACT, Europol task forces, and Joint Action Days, with notable operational successes for Poland, in cases involving Ukrainian refugees and cross-border labour and sexual exploitation. **Poland**'s use of hackathons and online monitoring tools, and **Greece**'s participation in joint operations such as "Amaryllis," illustrate innovative and effective cross-border collaboration. Joint Investigation Teams, while recognised as valuable, remain underused, particularly in **Greece**.

Finland, similarly, participates in European cooperation frameworks and has succesfully cooperated with countries such as **Romania** in addressing the commercial sexual exploitation of children. Finland is also part of the new Europol Operational Task Force (OTF) GRIMM which aims to "tackle the rising trend of violence-as-a-service and the recruitment of young perpetrators into serious and organised crime".

Under Europol's 2023 coordinated actions, the Portuguese authorities were involved in dismantling organised groups exploiting minors and women for forced begging across Europe. Similarly, Interpol's Operation Liberterra II in 2024 saw Portugal collaborate in a large-scale rescue of over 3000 victims of trafficking and smuggling. Within the FRONTEX's VEGA Children initiative, Portuguese border officials are equipped with training and tools to detect unaccompanied minors and potential victims of child trafficking at border crossings, showcasing the country's commitment to child protection in migration contexts.

Across all reports, cooperation within the EU is consistently described as more predictable and effective than cooperation with third countries, where delays, legal divergences, and lack of reliable counterparts complicate investigations, victim repatriation, and financial inquiries. Even within the EU, financial investigations and asset tracing across borders remain weakly developed. NGOs and international organisations such as IOM, UNICEF, La Strada, and Caritas play a crucial intermediary role in cross-border referrals and reintegration, but the absence of permanent international NGO coordination platforms limits continuity, particularly for children at risk of re-trafficking.

3. Recommendations

- **Strengthen the operational use of EU cooperation tools in child–trafficking cases:** Member States should promote systematic use of SIS alerts, ECRIS, Europol analytical support, Eurojust coordination, and Joint Investigation Teams in cases involving children, addressing the underuse of existing tools and reducing reliance on informal channels.

- **Ensure early, coordinated identification through frontline multi-agency cooperation:** Border authorities, police, child–protection services, labour inspectorates, and NGOs should be enabled to cooperate at the earliest stages of contact with children, supported by clear referral pathways, joint risk assessment practices, and rapid access to specialised expertise.

- **Institutionalise the role of civil society in partnership frameworks:** NGOs providing child-specific expertise, outreach, and victim support should be formally integrated into national and cross-border cooperation mechanisms, with sustainable funding and feedback loops, rather than operating through ad hoc or project-based arrangements.

- **Enhance cross-border cooperation through structured and predictable channels:** Member States should strengthen direct operational links with key countries of origin, transit, and destination for trafficked children, using Europol, Eurojust, EMPACT priorities, and liaison officers to ensure timely information exchange, joint investigations, and coordinated victim protection measures.

- **Invest in joint, multidisciplinary training across sectors and borders:** Regular joint trainings involving police, prosecutors, judges, social workers, border authorities, and NGOs should be institutionalised to build shared understanding, reduce fragmentation, and improve the child-sensitive handling of trafficking cases, including in cross-border contexts.

- **Improve data integration and interoperability while safeguarding child rights:** Member States should address persistent barriers to information-sharing by developing interoperable, child-sensitive data systems and protocols that enable timely access to relevant information for authorised actors, while ensuring confidentiality, data protection, and the best interests of the child.

4. Practical tools

→ e-Justice Communication via Online Data Exchange (e-CODEX)

→ Eurodac, the European Union's centralised biometric database, designed to assist with the management of asylum applications and support efforts to detect, investigate, and prevent terrorism and serious crime.

→ European Criminal Records Information System (ECRIS)

→ European Criminal Records Information System - Third Country Nationals (ECRIS-TCN)

→ INTERPOL databases, that support global criminal intelligence sharing, including for child sexual exploitation and trafficking, including the ICSE (International Child Sexual Exploitation) database, which facilitates cross-border identification of CSAM and victims and experts can retrieve clues, identify any overlap in cases and combine their efforts to locate victims of child sexual abuse.

→ Joint Investigation Teams Collaboration Platform (JITs CP)

→ OSCE Action Plan & Toolkit on Human Trafficking, including international, regional cooperation and good practices.

- Schengen Information System (SIS)

- Transnational Referral Mechanism of the Baltic Sea Region, operating across the Baltic Sea Region, Bulgaria, Romania, and Ukraine, which sets out procedures for the safe and effective transnational referral and assistance of trafficking victims to appropriate services.

- UN Special Rapporteur on Sale and Sexual Exploitation of Children, 25 Years of Fighting the Sale and Sexual Exploitation of Children: Addressing new challenges, promoting multi-stakeholder cooperation.

ANNEX I: COUNTRY-SPECIFIC BIBLIOGRAPHY

Belgium:

1. SafeBorders Country report - Belgium

National legislation (as in force on 14 October 2025)

2. Criminal Code (1867)
3. Code of Criminal Procedure (1878)
4. Law of 14 November 2019 amending the law of 17 April 1878 containing the preliminary title of the Code of Criminal Procedure with a view to removing the limitation period for serious sexual offences committed against minors.
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