



Organization for Security and Co-operation in Europe

Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings

Foreword

On 27-31 October 2025, I conducted a country visit to the Netherlands to hold consultations with high-level government officials, law-enforcement, and the judiciary as well as representatives of civil society and businesses. The objectives of the visit were to identify promising practices for combating trafficking in human beings (THB), as well as to promote the full implementation of OSCE commitments in the field of anti-trafficking, notably holistic and comprehensive actions aiming to better prevent and respond to human trafficking and to protect and support victims. I am grateful for the constructive, candid discussions with numerous interlocutors and the comprehensive information they provided to inform the analysis in this report.

The Report from the visit was finalized and presented to the Netherlands on 29 May 2026. The Government submitted its first round of comments on 20 July 2026 and the final ones on 19 August 2026, both of which are fully incorporated into the report.

The Netherlands has advanced its efforts to detect and investigate human trafficking, including online, with the help of specialized police units, a network of specialized prosecutors, and judge specialization. In the area of prevention, it was encouraging to observe the comprehensive multi-stakeholder efforts targeting multiple forms of trafficking, including for forced criminality. The Dutch independent National Rapporteur on Trafficking in Human Beings and Sexual Violence against Children was among the first ones established in the OSCE region and maintains a strong mandate. Nonetheless, the report contains a list of recommendations to further strengthen anti-trafficking efforts in the Netherlands, such as vesting a stronger and higher mandate to the country's coordination mechanism; adopting the bill on modernizing its anti-trafficking legislation, including mandatory application of the non-punishment principle; the development and adoption of a formal National Referral Mechanism, guided by a "social path" approach; and increasing efforts to tackle the demand that fosters sexual and other forms of exploitation.

While encouraging relevant authorities to implement the comprehensive set of recommendations made in this report, I look forward to deepening our established collaboration and to furthering our future co-operation to protect the most vulnerable and disadvantaged members of society from human trafficking.

A handwritten signature in blue ink that reads 'Kari Johnstone'.

Dr. Kari Johnstone

OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings



Organization for Security and Co-operation in Europe

Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings

Report by the OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings, Dr. Kari Johnstone, following the country visit to the Netherlands 27-31 October 2025¹

Summary:

The OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings Kari Johnstone conducted an official visit to the Netherlands on 27-31 October 2025 to assess the country's anti-trafficking laws, policies, and practices. During the visit, special attention was paid to national efforts to protect the rights of and provide assistance to trafficking victims, coordinate anti-trafficking measures, prevent human trafficking, and prosecute perpetrators in line with OSCE commitments and relevant international standards.

The Special Representative appreciated open and constructive discussions in all the meetings with government counterparts and the civil society, and she would like to highlight high media attention to the topic of trafficking in the country. She also commends the ongoing legislative processes on the modernization and expansion of the criminalization of human trafficking.

The anti-trafficking architecture in the Netherlands is well-developed, albeit fragmented with competencies for identification and assistance to victims distributed between municipality and central government level. The Netherlands was among the first participating States in the OSCE to establish the institute of the independent National Rapporteur on Trafficking in Human Beings and Sexual Violence against Children. The Special Representative also lauds Dutch efforts—by both governmental stakeholders and NGOs—to include the expertise of lived experience experts in policy development, in prevention and protection work. She wishes to see an increased prioritization of anti-trafficking in the political agenda with the formation of the new government including by vesting a stronger and higher mandate to the country's coordination mechanism, critical for countries where regional governments enjoy a level of independence.

The Special Representative commends the comprehensive multi-stakeholder efforts on prevention targeting multiple forms of trafficking, including for forced criminality, especially in some of the most affected municipalities. Projects such as “Prevention with authority,” “Keerpunt,” the Netherlands leading role in the European Port Alliance public-private partnership (PPP) with its Rotterdam Port Alliance,² and “CoCo” VR intervention³ for tackling organized crime and drug trafficking in Rotterdam's port, as well as targeted capacity-building activities for educators to help reach vulnerable youth and increase the preparedness of agencies to address these challenges using different strategies. She further welcomes the creation of institutional structures to address labour exploitation through

¹ The report was finalized on 28 August 2026

² [Programma - Port Alliance Rotterdam](#)

³ [VR intervention CoCo \(Cocaine Collectors\) makes young people more aware of the temptation of quick money - geweldigrotterdam.nl](#)

increased oversight of temporary employment agencies and efforts to prevent abuse of the “posted workers scheme.” Several mechanisms have been put in place to prevent trafficking for sexual exploitation through implementing cross-country exit programs for persons wishing to exit prostitution, conducting regular inspections of places for commercial sex, and introducing a permit system for persons in commercial sex. At the same time, as reportedly unregulated commercial sex amounts to a bigger part of the sector, further robust measures are necessary to curb demand that fosters trafficking for sexual exploitation. Given that online sexual exploitation continues to prevail, particularly targeting children and youth, stronger regulations for age and consent verification and other protection measures are mandatory for online platforms, accompanied by stringent supervision and enforcement.

In the area of protection of trafficking victims, the Special Representative appreciates the ongoing discussions on reforming the victim identification system to include roles for formal identification by non-law enforcement actors and identification committees as part of a National Referral Mechanism (NRM), which the Netherlands still lacks. This aligns with the “social path” approach recommended by the OSCE, which prioritizes victim protection as a key purpose of victim identification and assistance delinked from criminal justice processes. The Office stands ready to provide further advice and assistance in the development and rollout of such an approach in an NRM. She notes the array of services for victims, including the availability of dedicated accommodation in a specialized shelter for persons with multiple assistance needs, such as substance abuse or mental health issues. At the same time, the Special Representative was made aware that the availability of services for trafficking victims is not equally distributed throughout the country, including the shortage of shelters for forced labour victims and specialized secure housing for victims exploited in criminal activities.

The Special Representative would like to highlight as promising practices the right of trafficking victims to legal aid funded by the state and the availability of compensation from a state fund for victims of violent crimes. The possibility of court-awarded compensations to be covered by the state, if the perpetrator has not paid it in 6 months, is also commendable and helps contribute to effective justice for victims⁴.

With regards to the criminal justice response to trafficking, the Special Representative would like to highlight several promising practices, such as the specialization of police investigators, prosecutors, and judges; active community-of-practice networks on human trafficking; and early investigative involvement of prosecutors to advise on the evidence needed to build trafficking cases. Each dedicated Immigration Crime and Human Trafficking team (TMM) of the regional AVIM units (Aliens Police, Identification and Human Trafficking) benefits from the inclusion of a cyber-specialist for open-source investigations (OSINT) of the online segment of the crime and a financial intelligence specialist. The Special Representative positively notes the Rotterdam unit of the Special Investigative Service for launching a trafficking investigation based on the country data provided by the OSCE mapping of adult sexual services websites. Nevertheless, while acknowledging the promising practices and ongoing efforts to improve the situation, the Special Representative notes the gap between the numbers of launched investigations and the convictions of traffickers and urges more robust investigations and prosecutions of trafficking crimes.

While there is generally a good understanding by professionals of forced criminality, the Special Representative sees the need for better coordination between the various police and special THB police units and the regular district and THB prosecutors on cases where

⁴ This report will not cover the issue of compensations in detail, as this was discussed in the [Council of Europe GRETA country evaluation report](#)

criminal acts were committed under coercion. Despite some considerable efforts to raise the awareness of front-line police about forced criminality and the “case load review mechanism” to detect possible forced criminality cases, individuals with trafficking indicators of exploitation in criminal activities—likely trafficking victims—are being prosecuted. In this regard, the Special Representative looks forward to the adoption of the bill on modernization of anti-trafficking legislation, which includes a mandatory application of the non-punishment principle (NPP) including robust capacity-building for all criminal justice actors on the correct application of the principle (“non-prosecution” as opposed to “non-punishability”). The Special Representative strongly recommends the introduction of record relief mechanisms (both criminal and administrative) to clear and correct wrongful convictions of trafficking victims for acts committed as a result of their trafficking experience.

Below, the Special Representative makes several concrete recommendations to enhance the Dutch response to human trafficking, including adopting the bill on modernizing the anti-trafficking legislation; the development and adoption of a formal National Referral Mechanism, guided by a “social path” approach; improving identification of victims of all forms of trafficking, including for forced criminality and online, children, and among migrants and asylum seekers; increased capacity-building for law enforcement and judges on the application of the non-punishment principle; boosting proactive investigation and prosecution of all forms of trafficking; and increasing efforts to tackle the demand that fosters all forms of trafficking, with particular focus on both legislative and education measures related to discouraging demand for sexual and other forms of exploitation.

Noting the regular assessment visits by the Council of Europe’s Group of Experts on Action against Trafficking in Human Beings (GRETA) with the latest report on the Netherlands issued on 9 November 2023, the Special Representative focused on newer developments and complementary areas beyond the scope of the latest GRETA evaluation round.

I. Introduction

1. This Report presents the central findings and recommendations of OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings, Kari Johnstone, (hereinafter referred to as the Special Representative) following her country visit to the Netherlands on 27-31 October 2025⁵.
2. The purpose of the visit was to hold consultations with government officials and experts from state institutions and civil society to learn of promising practices as well as to support and advance ongoing efforts to prevent trafficking, assist trafficking victims and protect their rights, and bring perpetrators to justice in line with OSCE commitments and relevant international standards.
3. In the course of the visit, the Special Representative and her team engaged in direct consultations with government officials, including the Netherlands’ Minister of Justice and Security; National Anti-Trafficking Rapporteur; Director General for Social Affairs and Employment; Head of the Netherlands Labour Authority; Head of the Financial Intelligence Unit; as well as representatives from the Ministries of Justice and Security, Foreign Affairs, Social Affairs and Employment, National Police, Dutch Public Prosecution Service, Dutch Immigration and Naturalization Service, Finance Intelligence Unit and the Fintel Alliance, Association of Dutch Municipalities, municipalities of

⁵ The Special Representative was accompanied by Programme Officer Tarana Baghirova and Associate Country Visit Officer Alexandra Donskova-Huber.

Amsterdam and Rotterdam, and judges of first and second instances, as well as lawyers dealing with trafficking cases.

The Special Representative and team also held consultations with lived experience experts; anti-trafficking NGOs, including CKM, CoMensha, Defence for Children, Dignita, Fairwork, Fier!, Keerpunt, La Strada International, Offlimits, Opora, Red Cross, Salvation Army, SHOP, Spine; and private sector representatives, such as TikTok and financial institutions.

4. The Special Representative wishes to thank the Dutch authorities, and in particular, colleagues from the Ministry of Justice and Security in charge of the anti-trafficking portfolio, especially Mr. Bas Vos, for their co-operation and assistance in organizing and facilitating the visit. She also wishes to thank all interlocutors in the Netherlands for their willingness to share their knowledge and insights, including by providing numerous informative documents that supported the desk research for this report.
5. Consultations during the visit focused on the situation of trafficking in human beings (THB) in the country and the ongoing policy, legislative, and operational responses to it. Discussions focused on co-ordination; monitoring and evaluation of anti-trafficking measures; the identification of, and provision of assistance to, victims of all forms of trafficking; the protection of victims' rights, including of migrant workers and persons without legal residency, and the application of the non-punishment principle; prosecutions and convictions of perpetrators; efforts in the area of prevention and countering the demand that fosters sexual and labour exploitation; and co-operation with civil society and partnerships with public and private entities.
6. Over the course of the visit, the Special Representative noted with appreciation that government officials and civil society representatives demonstrated significant awareness and understanding of human trafficking as a serious crime and violation of fundamental rights and the need for adopting a victim-centered approach, awareness of emerging trafficking trends in the country--especially for forced criminality, and motivation to fight trafficking and protect victims.
7. The Special Representative stressed the importance of ensuring the high political profile of the anti-trafficking agenda, as well as adoption and implementation of a non-punishment principle as a key priority amid the growing exploitation for forced criminality. She notes that the development of the National Referral Mechanism would help consolidate the efforts of all actors, ensure victim protection, and clarify roles and responsibilities of various actors.

II. Legal framework

8. The Special Representative commends the Netherlands for being a party to major international instruments in the fight against trafficking in human beings, such as the United Nations Convention against Transnational Organized Crime (ratified in 2004) and its Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children ("Palermo Protocol," ratified in 2005), and the Council of Europe Convention on Action against Trafficking in Human Beings, ratified in 2010.

The country has also ratified a number of Conventions addressing trafficking and forced labour such as the International Labour Organization (ILO) Forced Labour Convention No.29 and its Protocol of 2014 ratified in 1933 and 2017, respectively; the ILO Convention on the Abolition of Forced Labour No.105, ratified in 1959; the ILO Convention on Worst Forms of Child Labour No.182, ratified in 2002. Furthermore, the Netherlands ratified the UN Convention on the Elimination of All Forms of Discrimination against Women and its

Optional Protocols (1999) in 1991 and 2002, respectively; as well as the UN Convention on the Rights of the Child in 1995. The Optional Protocol on the Involvement of Children in Armed Conflict and on the Sale of Children, Child Prostitution and Child Pornography, were ratified in 2009 and in 2005, respectively.

The Special Representative recommends that the Netherlands sign and ratify the ILO Domestic Workers Convention No. 189, as well as the International Convention on the Protection of the Rights of all Migrant Workers and Members of their Families, which is of particular importance to enhance protection mechanisms in the context of mixed migration flows and of temporary workers.

9. As a participating State to the OSCE, the Netherlands has also pledged to implement the commitments it has undertaken in the OSCE framework, in particular the recommendations contained in the 2003 Action Plan to Combat Trafficking in Human Beings, as well as its 2005⁶ and 2013⁷ Addendums.
10. Domestically, human trafficking is defined in article 273f of the Dutch Criminal Code (DCC) with a sentence of up to 12 years or a fifth category fine and increased sentences if the crime is carried out against a minor or a person in a vulnerable position, is carried out by a group of two and more persons, or leads to severe bodily injury or death. The Special Representative positively notes that the exploitative purposes in the trafficking statute cover the minimum forms of trafficking outlined in the Palermo Protocol, such as sexual exploitation; forced or compulsory labour or services, including begging; slavery and practices similar to slavery; servitude; and for exploitation in criminal activities.

She also notes the draft bill "Modernization and Expansion of the Criminalization of Human Trafficking," which amends article 273f by expanding exploitative forms to include forced surrogacy and forced marriage. It also introduces a new criminal offense of "serious disadvantage," which should help prosecute severe workplace exploitation that previously did not meet the very strict legal definition of human trafficking. The bill also broadens the scope for tackling offenders who profit financially from trafficking. The Special Representative welcomes these legislative changes and hopes that the modernization will lead to increased prosecutions, if accompanied by sufficient guidelines for prosecutors and judges on the correct application. She notes with caution that victims of "serious disadvantage" should be granted access to equal rights and protections as trafficking victims.

The new draft bill also enshrines the non-punishment principles under Art. 273f para 9, prescribing exoneration from the punishment of persons who have been compelled to commit the acts as a result of trafficking. This issue is further discussed in para 48 of this report. The Special Representative welcomes the introduction of an explicit provision of the principle and looks forward to its adoption and effective implementation. Additionally, she recommends developing joint guidance for law enforcement, prosecutors, and judges on its application at all stages of the criminal justice process.

The Special Representative further supports the draft provision introducing an obligation to report human trafficking, which will apply to everyone who is aware of a THB case, except for victims and their family members, confidential counsellors, social workers, and other professional groups with a right of non-disclosure. Such a measure premises better identification of victims and should lessen the burden on them to self-identify.

⁶ OSCE Permanent Council Decision No. 685 [Addendum to the OSCE Action Plan to Combat Trafficking in Human Beings: Addressing the Special needs of Child Victim of Trafficking for Protection and Assistance](#), PC.DEC/685

⁷ No.1107 [Addendum to the OSCE Action Plan to Combat Trafficking in Human Beings: One Decade Later](#), PC.DEC/1107/Corr.11

11. Article 273g DCC, which entered into force on 1 January 2022, establishes criminal liability (up to four years imprisonment) for anyone who performs sexual acts with another person, knowing—or having serious reason to suspect—that the person is in a human trafficking or exploitation situation. It appears that this article has not been applied consistently due to significant legal and evidentiary challenges to prove the “knowledge.” By way of example, since its adoption, police authorities have investigated only five to six cases related to Article 273g, and of these, only two cases were brought to court, and as of late 2025, only one resulted in punishment. A primary reason for the lack of consistent application is that the legal threshold for proving “known use” is considered very high. Prosecutors must provide evidence that the buyer performed sexual acts while knowing or having serious reasons to suspect that the individual was a victim of trafficking. Even though the threshold for prosecuting the purchase of sex from minors (Article 245 of the DCC, “lewd acts” against under-16-year-olds, including while purchasing sex) is much lower and easier to enforce, the courts issued suspended sentences to offenders⁸ that are not sufficiently stringent to act as a deterrent.

Despite these challenges in practice, the scope of similar criminal liability is planned to be expanded to the “known use” of non-sexual services through the new legislative reform transposing the amended EU Anti-Trafficking Directive (2024): while intentional use of sexual services remains punishable, the new draft law also criminalizes the intentional use of non-sexual services from a victim of trafficking. Given the challenges described above, the Special Representative recommends that the Ministry of Justice and other relevant stakeholders critically examine the current laws that apply the “known use” to the commission of the offence, and ensure that investigative, prosecutorial, and judicial authorities apply the “known use” DCC articles more rigorously and award stricter punishments within the prescribed framework of criminal liability to effectively curb the demand that fuels exploitation of victims of trafficking.

12. The EU Forced Labour Regulation was adopted in 2024 (will apply as of December 2027), and in the preparation for its implementation, the Dutch Ministry of Foreign Affairs commissioned a study⁹ aiming to provide initial insight into countries and product groups with a possible risk of forced labour in Dutch imports, as well as insight into how companies can identify and prioritize potential forced labour risk products. The EU Corporate Sustainability Due Diligence Directive (CSDDD) will be transposed through a draft bill called the International Responsible Business Conduct Act (Wet internationaal verantwoord ondernemen (WIVO)), which was first presented in late 2024 and subsequently revised and published for consultation¹⁰ in 2026, following the EU Commission's omnibus proposal. The Wivo will apply from July 2029 to EU companies with over 5,000 employees and a global net turnover of 1,5 billion EUR or more, and non-EU companies with 1,5 billion EUR turnover within the EU market, requiring them to conduct risk-based due diligence to identify, prevent, and mitigate adverse human rights and environmental impacts in their operations and value chains. Enforcement of the law will be supervised by the Authority for Consumers and Markets (ACM) of the Ministry of Economy with administrative penalties for non-compliance. The Special Representative commends the work that has been done to date to implement the CSDDD on the national level and encourages the Netherlands to develop legal requirements making the Directive applicable to companies of smaller size as well. The national legislation should include a strong mandate for ACM and strengthen access to remedies for workers exploited in corporate conduct and in supply chains.

⁸ [ECLI:NL:RBZWB:2023:8337, District Court of Zeeland-West-Brabant, 02-175456-22;](#)
[ECLI:NL:RBZWB:2023:8338, District Court of Zeeland-West-Brabant, 02-225662-22;](#)
[ECLI:NL:RBZWB:2023:8340, District Court of Zeeland-West-Brabant, 02-175681-22](#)

⁹ [Assessing Forced Labour Risks in Dutch Imports | Report | Government.nl](#)

¹⁰ [Overheid.nl | Consultation on the International Responsible Business Conduct Act](#)

13. The Netherlands is currently deepening its legislative framework for victim identification and referral– this topic will be covered in more detail in Section III. Victim care and support, including in criminal proceedings, are provided within the framework of several legislative acts, including the Social Support Act¹¹, Legal Assistance Act,¹² and the Criminal Procedure Code,¹³ supplemented by policy arrangements governing specialised care for victims of trafficking. The recovery and reflection period are regulated by the Aliens Act of 2000 (Vreemdelingenwet 2000, Section 8k) and Aliens Circular (Vreemdelingen circulaire, Section B8/3.1). Some of the further relevant recent legislative acts and amendments are:
- Provision of Personnel Admission Act (Wet toelating terbeschikkingstelling van arbeidskrachten – Wtta¹⁴), approved in 2025, introduces a mandatory admission permit system for temporary work agencies, which can apply for admission through July 1, 2027, and full enforcement, including hiring verification via a public register, beginning January 1, 2028. Agencies will need a certificate of good conduct (VOG), a significant financial deposit, and proof of correct wage and tax payments.
 - Amendments to the Civil Code, prohibiting the use of 0-hour contracts (with exceptions for high school and college students, or retirees with part-time jobs).
 - Media Act (Mediawet¹⁵), providing the legal basis for the Dutch Media Authority (DMA) to supervise online platform services established in the Netherlands, enforcing rules aimed at protecting minors from harmful content and exploitation.
 - Administrative Approach to Online Child Pornographic Material Act (Wet bestuursrechtelijke aanpak online kinderpornografisch materiaal¹⁶) from 2024, establishing the legal duties of the ATKM (Authority for Online Terrorist and Child Pornographic Material) to proactively stop the distribution of exploitative material online.
14. Overall, the Special Representative commends the Netherlands for its robust legislative framework to prevent and combat human trafficking and related crimes, as well as ongoing legislative efforts to strengthen the anti-trafficking system. Nevertheless, she encourages further refinement of the legal framework and its practical implementation through adoption of the National Referral Mechanism following the “social path” approach to identification and assistance to victims; final adoption of the planned amendments to the Criminal Code, including the non-punishment principle; and further legislative amendments to introduce specific statutory procedures enabling erasure, vacatur, or annulment of criminal convictions and administrative sanctions imposed on trafficking victims for offences committed as a consequence of their trafficking situation.

III. Policy and institutional framework

15. A key policy document for OSCE participating States is a national anti-trafficking action plan (NAP), which helps unite political will on the topic, lay out strategies and activities for combating trafficking, and identify responsible agencies and mobilize resources. The current Dutch NAP is titled Action Plan Together against Human Trafficking (Actieplan programma Samen tegen mensenhandel) and covers 2024-2027. Its three core strategic goals are preventing exploitation; rapid identification and adequate care for victims; disrupting and tackling offenders by all legal and administrative means, while reducing recidivism, structured around six key action lines:
- Creating broad awareness of human trafficking;

¹¹ [wetten.nl - Regulation - Social Support Act 2015 - BWBR0035362](https://wetten.nl/Regulation-Social-Support-Act-2015-BWBR0035362)

¹² [wetten.nl - Regulation - Law on legal aid - BWBR0006368](https://wetten.nl/Regulation-Law-on-legal-aid-BWBR0006368)

¹³ [wetten.nl - Regulation - Code of Criminal Procedure - BWBR0001903](https://wetten.nl/Regulation-Code-of-Criminal-Procedure-BWBR0001903)

¹⁴ [Staatsblad 2025, 385 | Overheid.nl > Officiële bekendmakingen](https://staatsblad.nl/2025/385/Overheid.nl/Officiële-bekendmakingen)

¹⁵ [wetten.nl - Regulation - Mediawet 2008 - BWBR0025028](https://wetten.nl/Regulation-Mediawet-2008-BWBR0025028)

¹⁶ [Staatsblad 2024, 162 | Overheid.nl > Officiële bekendmakingen](https://staatsblad.nl/2024/162/Overheid.nl/Officiële-bekendmakingen)

- Increasing the willingness to report (both by victims and third parties);
- Improving the identification and protection of victims;
- Strengthening regional and supra-regional cooperation;
- Enhancing information sharing and data processing;
- Reinforcing support for minor victims.

The NAP introduces a single, central information point for trafficking issues¹⁷: the National Coordination Centre against Human Trafficking (CoMensha), which coordinates emergency and long-term victim care, and helps build standardized regional policies and networks (including so-called chain directors, care coordinators, and attention officers). It also supports the municipalities and regions that do not yet have a policy in tackling human trafficking to shape and implement one by 2027. Targeted awareness campaigns with special attention to at-risk groups (e.g., minors, migrant workers) are combined with Field Labs¹⁸ and pilot projects to train professionals, new assistance interventions for victims of trafficking, and strengthening reporting and detection in sectors such as education and businesses. It also plans to provide guidance on whether victim status for eligibility under the B8/3 scheme¹⁹ can be determined independently of investigative services and separated from the investigation process. The plan sets milestones for action development, accountability, and phased roll-out with budget assigned per activity, with implementation targeted for completion by end of 2027. Progress is monitored by a dedicated steering group, with clear roles for ministries, municipalities, NGOs, law enforcement, and care organizations. Twice a year, the government sends a progress report to the parliament on the implementation of the NAP (latest is dated 3 July 2026)²⁰. The current action plan will be evaluated upon its conclusion and any areas for improvement arising from this evaluation will be incorporated into a subsequent action plan. As reflected in the 2026-2030 coalition agreement, the Cabinet announced that it would continue the “Together Against Human Trafficking” program.

16. The Special Representative lauds the comprehensiveness of the current NAP across all areas of the anti-trafficking response, as well as the inclusion of concrete timelines and allocated budget for the actions. At the same time, several civil society members and survivor leaders met during and on the margins of the visit reported that while the NAP demonstrates strong commitment across sectors, there has been limited inclusion of direct survivor feedback in its development. To address this, the Spiegelgroep (Mirror Group) was launched in 2025, consisting of eight professionals with “lived-through experience” with different backgrounds (types of exploitation, different genders, Dutch and other nationalities), to incorporate expertise by experience more structurally in the implementation of the action plan. The lived experience experts, who already had experience working with various national organizations and NGOs, are officially hired by CoMensha with funds from the Ministry of Justice budget. The task of the group is to mirror steering boards on implementation of the NAP, as well as to be actively involved in the realization of some actions. Ministry of Justice is also planning to set up a pool of experts with lived experience for a wide range of policy advice and capacity-building tasks. The Special Representative was encouraged to see these proactive steps to integrate lived experience expertise ethically to inform and strengthen government anti-trafficking policies and practices.

The Special Representative commends the latest developments and encourages further inclusion of lived experience experts’ and civil society inputs into the development of the future NAP and NRM. Substantively, she recommends the new NAP ensure specific actions

¹⁷ [Home - Comensha](#)

¹⁸ Field Labs are problem-oriented innovation programs designed to develop and test new methods for combating exploitation, following the Harvard Field Lab methodology. Recent examples include Tulpafslag or Lovitura.

¹⁹ Residence permit for trafficking victims as per [Circular on Foreign Nationals 2000 \(B\)](#)

²⁰ [Human trafficking | House of Representatives of the States General](#)

to address increasing online exploitation of children and adults; establishing partnerships with private entities such as technology companies to develop specific tools and strategies; continuing research and awareness-raising on various forms of trafficking, such as exploitation for criminal activities; examining financial flows generated and linked to human trafficking by including the Financial Investigation Unit and financial regulators in anti-trafficking co-ordination efforts as crucial NAP stakeholders with specific tasks assigned to follow, identify, and disclose illicit financial flows related to trafficking; and enhancing prevention efforts by curbing demand for sexual exploitation by legislative and policy measures and through education initiatives and programs aimed at youth criminality prevention.

17. The Netherlands maintains several national and regional action plans that intersect with anti-trafficking efforts, focusing on youth resilience, the prevention of organized crime, and the elimination of sexual violence. These plans form a complex, interconnected policy landscape intended to address the root causes of exploitation. Prevention with Authority²¹ (Preventie met Gezag - PmG) is a major integrated program to prevent young people from entering or growing further into a life of organized crime, with 250 mln EUR funding in the current cycle (2026-2029). It focuses on vulnerable youth and young adults aged 8 to 27 in neighbourhoods with a high risk of criminality. The program seeks to establish a balanced approach between prevention and repression, combining social care and self-confidence building with strict boundary-setting by judicial partners like the police and Public Prosecutor's Office. It includes five intervention themes: education (tackling truancy), work and income (finding legitimate jobs), personal development, social networks (family and peer support), and reintegration after detention. PmG is a primary tool for addressing forced criminality, as many youth targeted by the program are also potential victims of criminal exploitation, and is regularly monitored and evaluated for progress.
18. The National Action Program on Sexual Transgressive Behaviour and Sexual Violence (2022-2026) aims to effect cultural change to prevent sexual harassment and violence. The program focuses heavily on awareness, education, the physical landscape, and workplace safety. The National Action Plan on Business and Human Rights (2022–2026) outlines steps to implement the UN Guiding Principles on Business and Human Rights, focusing on corporate responsibility within global supply chains. It emphasizes the State duty to protect and the corporate responsibility to respect human rights, which directly connects to preventing labour exploitation and is supported by upcoming legislation such as the WIVO. The Safety Agenda 2023–2026, implemented by the Ministry of Justice and Security, defines national policy objectives for the police and prioritizes issues such as organized crime, cybercrime, and human trafficking.
19. The Youth Reform Agenda 2023-2028²², aimed at protection of children and young people in and aging out of institutional care, and promoting the switch from institutional care to the guardianship system with the aim to structurally address the bottlenecks in youth care. It contains a number of components that could potentially improve the assistance provided to minor victims of sexual violence and minimize the potential risks of trafficking among this vulnerable group. The Special Representative lauds the proactive innovative multi-disciplinary and well-funded approaches the Netherlands implements when tackling various themes related to various forms of trafficking, being on the forefront in many of those areas.
20. With regard to the institutional anti-trafficking framework in the Netherlands, the overall coordination of the national approach and political responsibility for the implementation of the NAP, as well as the law enforcement response lies with the Ministry of Justice and

²¹ [Preventie met Gezag](#)

²² [Hervormingsagenda Jeugd 2023-2028](#)

Security. Further actors involved in implementing anti-trafficking measures include the Ministry of Health, Welfare and Sport (responsible for shelters and care at the central level), Ministry of Social Affairs and Employment (tasked with prevention and oversight of labor exploitation, as well as some integration measures), the Ministry of Foreign Affairs (in charge of consular affairs, supporting global efforts to prevent and combat human trafficking along migration routes - including protection and assistance of victims, as well as providing guidance on the application of the International Responsible Conduct Law), the Dutch Association of Municipalities, as well as the municipalities themselves. At the time of the visit and writing of the report, the various coordination functions at the Ministry of Justice were carried out at the level of advisors and project managers, with no higher-level position assigned with the mandate of the National Anti-trafficking Coordinator (NAC). While the NAC team undoubtedly does important work in following the anti-trafficking developments, coordinating with various stakeholders and commissioning studies for evidence-based interventions, several interlocutors consulted during the visit noted that national coordination could benefit from a stronger mandate. This is particularly important when it comes to victim identification, referral, and protection, which fall under the mandate of municipalities with varying capacity to effectively implement human trafficking policies. As the central government does not have an oversight mandate of the distribution of roles and responsibilities across municipalities, this results in inconsistent quality of assistance provided to victims and delays in complex cases. Following a recommendation from the National Anti-Trafficking Rapporteur, the parliament tasked the Ministry of Justice and Security to do research on national coordination at various levels. The study, commissioned by WODC and conducted by RAND Europe was released in April 2026²³, and at the time of writing there were plans to formally appoint the Minister of Justice and Security as the National Anti-trafficking Coordinator and further streamline the coordination between agencies through establishing a Steering Committee on Combating Human Trafficking. The Special Representative reiterates the need for establishing clear roles and responsibilities for all anti-trafficking actors and urges strengthening the mandate of the NAC by placing the coordination at a higher level in the government, in line with the OSCE's Issue Brief²⁴ on the role of the national anti-trafficking coordination.

21. The National Rapporteur on Trafficking in Human Beings and Sexual Violence against Children (NAR) is an independent institution, formally established by law in 2000. The work of the NAR and the supporting office is funded by four different ministries but remains legally and functionally independent to ensure objective analysis and advice. The NAR has a statutory mandate to conduct research, monitor policy outcomes, and issue evidence-based recommendations to the government. The NAR is analysing the nature and extent of THB in the Netherlands, including identifying emerging trends, such as the rise in criminal exploitation of youth and tech-facilitated trafficking, by gathering data from diverse sources, including the CoMensha, the Immigration and Naturalisation Service (IND), and law enforcement agencies. The National Rapporteur periodically publishes detailed monitoring reports and annual figures, such as *Annual Figures on Human Trafficking 2024*²⁵ (published in October 2025), or *Rich signals, varying follow-up*²⁶ (3 April 2025), which analysed how over 8,000 signals of human trafficking were handled by the police, the Netherlands Labour Authority (NLA), and the Royal Netherlands Marechaussee (KMar) between 2018 and 2023, concluding that limited follow-up often prevents signals from developing into full investigations, especially in relation to labour exploitation. Accompanied by suggestions to

²³ [Landelijke aansturing en coördinatie aanpak mensenhandel: Eindverslag van kennistafels: \[National governance and coordination of the response to human trafficking in the Netherlands: Expert roundtables on challenges and the possible role of a national coordinator\] | RAND](#)

²⁴ [CTHB IssueBrief_260113.indd](#)

²⁵ [Annual figures Human Trafficking 2024: number of underage victims of criminal exploitation rising | National Rapporteur](#)

²⁶ [Rijke signalen, wisselende opvolging | Nationaal Rapporteur](#)

the judiciary, the *Case Law Research on Human Trafficking 2019–2023*²⁷ identified significant regional differences in how judges assess facts and hand down sentences and called for more consistent application of Article 273f of the Dutch Criminal Code. The Rapporteur also frequently provides opinions on matters pertaining to legislation and policy measures in the field of THB²⁸. The Special Representative lauds the long-standing and strong mandate of the Dutch National Rapporteur, highlighting the model as a promising practice for other OSCE participating States looking to establish an independent oversight function.

22. In conclusion, the Special Representative notes robust Dutch anti-trafficking architecture, which serves as a good basis for a comprehensive anti-trafficking response. At the same time, she calls on authorities to elevate the coordination function in the government and assign it a strong mandate with decision-making powers and clear roles and responsibilities. This will help ensure that effective interventions are rolled out nationwide and mitigate existing regional differences in application of the anti-trafficking policies. She further encourages the Netherlands to continue the utilization of the recently-established “Mirror group” (see para 20) for the development of anti-trafficking laws, policies, and practices, including in decision-making and research. OSCE/ODIHR’s publication on National Survivors of Trafficking Advisory Councils²⁹ lays out best practices and possible ways of structuring survivor leaders’ bodies and councils, and their involvement in preventing and combating human trafficking and protecting the human rights of victims and survivors.

IV. Identification, referral and assistance for victims of trafficking

23. Regarding the demographics of trafficking victims, in 2024, 944 victims of human trafficking were reported to CoMensha, versus 868 in 2023, continuing the rising trend from 2021. 23 per cent of reported victims of human trafficking have Dutch nationality, with other victims coming from other European countries (28%), Africa (25%), and, increasingly, Latin America (16%). Compared to 2023, while the number of victims originating from African countries remained unchanged, the number of victims from other nationalities have increased. This increase was by far the strongest among victims of Asian nationality (+30%), who are mainly trafficked for labour exploitation and, to a lesser extent, sexual exploitation. 2024 also saw more Ukrainian victims identified: in total 28 victims identified, mainly of labour exploitation (21 victims) and, to a lesser extent, sexual exploitation (5 victims). In terms of the types of exploitation, the most commonly reported form of trafficking was transnational sexual exploitation (364 victims, a 9% increase from the previous year), followed by labour exploitation (356 victims, increased by 19% compared to 2023), criminal exploitation (160 victims, but the most significant increase in reports by 33% from 2023), internal sexual exploitation (123 victims) and forced organ removal (less than 5 victims). Some victims experienced multiple forms of exploitation simultaneously - for example, 47 victims were subjected to both criminal and sexual exploitation in 2024. The majority of registered victims were female (556), predominantly victims of transnational (288) and internal (116) sexual exploitation, whereas men (385) are more frequently registered as victims of labour (239) and criminal exploitation (91). There was a sharp 52 per cent increase in registered minor victims, rising to 79 children in 2024. The cause of this increase is primarily due to criminal exploitation, where the number of registered minors jumped from 13 in 2023 to 42 in 2024. While not officially recorded as trafficking, the numbers of reports of online sexual exploitation of children to Offlimits, the

²⁷ [Developing through insight, case law research on human trafficking 2019 - 2023 | National Rapporteur](#)

²⁸ [Position paper National Rapporteur for the roundtable discussion of the Parliamentary Standing Committee on Justice and Security on the bill to modernise and expand the criminalisation of human trafficking | National Rapporteur](#)

²⁹ [Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils \(NSTACs\) \(osce.org\)](#)

Dutch national hotline, grew significantly last year³⁰: from 127,081 in 2024 to 152,946 in 2025. These were connected to 927,581 URLs, potentially containing child sexual abuse imagery (CSAM), out of which 238,724 turned out to be illegal according to Dutch law. Of all the criminal URLs in 2025, 39.4 per cent of the cases were “self-generated abuse material,” and out of those in around 85 per cent of cases the victims were “pre-pubescent,” which means that the victim is estimated to be under 12 years old. This extremely worrying trend of “self-generated CSAM” could indicate third-party involvement where young children may be seduced and tricked by adults to send these images. Child abusers are increasingly using chats on social media or in online children's games, where they pretend to be peers and try to persuade children to send photos of themselves³¹.

24. Despite the official registration of 944 victims in 2024, the National Rapporteur and other authorities estimate the actual number of trafficking victims in the Netherlands is likely around 5,000 per year³², suggesting significant under-identification. This is true for all types of exploitation, with forced criminality a particularly latent one, as victims normally do not self-identify as such and are reluctant to report exploitation due to fear of being prosecuted for acts they were compelled to commit. The sharp increase in identified victims of trafficking for forced criminality--particularly among Dutch and foreign minors exploited for drug trafficking (e.g., picking up drugs from the port of Rotterdam), violence-as-service acts,³³ and placing explosives--is possibly just the tip of the iceberg. Already during the 2022 research into the nature and scope of criminal exploitation, CKM (Centre against Child and Human Trafficking) found that approximately 50 per cent of the frontline professionals interviewed reported having contact with one or more victims of criminal exploitation within the previous two years³⁴, and in 2024 the majority of victims of this form of exploitation that turned to CKM's hotline were exploited in drug-related crimes. Criminal gangs groom the young boys, initially by offering them gifts such as new clothes, mobile phones, and a place to stay, after which the boys are caught up in debt bondage. Some criminal gangs give the boys benzodiazepines (e.g. Rivotril) to make them more passive and easier to handle. Meanwhile, research studies also show how girls and young women are increasingly drawn into exploitation in drug-related crimes; remaining unidentified as trafficking victims due to signs of coercion being misinterpreted as being in a consensual relationship or making “bad choices.”³⁵ Many of them experience both criminal and sexual exploitation, with the two reinforcing each other. Recruitment into forced criminality mostly happens via social media such as Snapchat, TikTok and Instagram³⁶, with victims deceived by creation of fake debts and threats by the organized crime groups. Victims of forced criminality, especially minors, are often misidentified as perpetrators: because they are often handled by regular police units rather than specialized TMM teams, the signs of their exploitation frequently go unrecognized. The Special Representative urges the Netherlands to advance its efforts to identify and protect victims of forced criminality including by adopting policies and practices, including through targeted capacity-building activities for all law-enforcement agencies on identifying the nuanced elements of this exploitative form. In doing so, she encourages the Netherlands to utilize the procedures, red-flag indicators, and recommendations presented in *Survivor and Trauma-Informed Model Standard Operating Procedures (SOPs): Guidance for Frontline Responders to Identify Victims and*

³⁰ [Meldpunt - 2025 -](#)

³¹ [Man uit Zwolle misbruikte tientallen meisjes online: ‘100? Dat zou kunnen’ | Nieuws | AD.nl](#)

³² [Multiple Systems Estimation Slachtoffers Mensenhandel Nederland 2016-2019](#)

³³ [‘Geweld op bestelling’ overspoelt Europa: meer dan 100 Nederlandse ronselaars in het vizier | Nieuws | AD.nl](#)

³⁴ [CKM - Kijken met andere ogen](#)

³⁵ [The human cost of crime - The harrowing link between drug trafficking and human trafficking | Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings](#)

³⁶ [The role of social media in young people's involvement in serious drug and violent crime | Police & Science](#)

*Cases of Trafficking for the Purpose of Criminal Exploitation*³⁷ to support accurate and timely identification and protection of victims of trafficking for forced criminality.

25. The Special Representative was made aware of the systemic labour exploitation concentrated in subcontracting-heavy industries, such as transportation and logistics³⁸, catering, food delivery,³⁹ and cleaning⁴⁰. Traffickers increasingly exploit the "posting of workers" scheme and the Knowledge Migrant Scheme to create "paper realities" that mask actual exploitation. Large-scale schemes involve bringing third-country nationals into the EU via countries like Poland or Lithuania and "posting" them to the Netherlands, often bypassing residency requirements and leaving workers in a state of extreme dependency on their employer for permits. In the Knowledge Migrant sector, employers may hold bank accounts in the names of employees to show high salaries on paper while actually paying only 10-20 per cent of the salary in cash, effectively trapping highly skilled workers in a cycle of debt and underpayment. The Special Representative highlights the increasing pattern of labour exploitation across the OSCE as revealed by its 2026 Survey Report⁴¹ and strongly recommends the Dutch authorities, particularly the National Labour Authority and the Ministry of Social Affairs and Employment, increase its efforts to prevent and identify trafficking of labour exploitation of third-country nationals.
26. Trafficking for sexual exploitation in the Netherlands has shifted significantly from visible commercial sex districts and licensed locations to more hidden, informal, and digital environments. According to the yearly report of the National Rapporteur, in 2024 approximately 46 % of all registered reports of sexual exploitation concerned home prostitution, which was particularly difficult for authorities to detect. In 2024 28% of the reported victims of sexual exploitation came from another European country, 25% had the Dutch nationality, 25% came from an African country, and 16% from Latin America. There has also been a 70 per cent increase in reports of sexual exploitation occurring in hotels and vacation homes in 2024 in a "carousel" model, where traffickers move mostly Latin American victims between various hotels or holiday parks every few days or weeks to avoid detection. The internet has long become the primary infrastructure for recruitment and facilitation of trafficking, especially through the use of social media platforms—most notably Snapchat, Instagram, and TikTok—and encrypted messaging apps like Telegram to groom and recruit victims. Thousands of unique advertisements for sexual services are placed weekly on specialized websites with weak age and consent verification mechanisms, making it relatively easy for minors to be offered for sex on these platforms, often using "veiled" language or emoticons like the tulip⁴². "Pimp boyfriends" (Tienerpooiers) use "romance scams," presenting a sham relationship to coerce vulnerable girls (often in youth care institutions) into sex trafficking. Social networks are used to groom children, which sometimes leads to "sexual extortion of minors," where victims are pressured to have sex or self-generate more nude images via threats of their intimate images being shared. Furthermore, the 2025 CKM report *Research into sexual exploitation by parents*⁴³ notes that between 2019 and 2023 at least 112 children, mostly girls (93%), reached out via Chat met Fier, the NGO's outreach program, reporting that they had been sexually exploited by one or both parents, often receiving payment for the abuse. Victims were very young, the average age was 15, with some as young as nine, and experienced prolonged exploitation – 77 per cent for over a year, and 20 per cent for more than ten years.

³⁷ [Survivor and Trauma-Informed Model Standard Operating Procedures \(SOPs\) | Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings](#)

³⁸ [Union sounds alarm over abuse of truck drivers by EU companies - DutchNews.nl](#)

³⁹ [Structural exploitation of workers without residence status in the Dutch cleaning and food delivery industry - News - Utrecht University](#)

⁴⁰ [Study finds widespread abuse of undocumented cleaners in the Netherlands | NL Times](#)

⁴¹ [OSCE Survey Report 2026](#)

⁴² [Brief-Field-Lab-Tulpafslag-16-januari-2023.pdf](#)

⁴³ [Children exploited by their parents: a hidden reality - CKM](#)

27. Unaccompanied migrant children are identified as a particularly high-risk group for both labour and sex trafficking. Between 2010 and 2019, over 2,570 unaccompanied migrant children disappeared from asylum/reception facilities, and in 2021-2024, 850 children went missing, including 237 from the Ter Apel registration center⁴⁴, raising concerns about their vulnerability to trafficking and exploitation. Locals have reported⁴⁵ instances where girls and boys were picked up by older men just outside asylum shelters, with missing children (particularly from Vietnam) later detected as trafficking victims in other countries, such as the United Kingdom. Further reports suggest the unaccompanied children are exploited by their own country nationals, e.g. while being housed in the Baarn asylum seekers center⁴⁶ or the Mrija accommodation center for Ukrainian refugees^{47,48}. There are recent reports pointing to the exploitation of children in other types of youth care institutions - the victims from a group home for girls between the ages of 12 and 16 who have been victims of trafficking for sexual exploitation were again sexually abused by three temporary workers⁴⁹. The shortage of staff and the use of temporary workers for night shifts seem to persist in specialized youth care and may aggravate the instances of (re)trafficking. The Special Representative expresses her serious concerns about the persistent and emerging risks of trafficking and abuse of children in the Netherlands, reflected in the statistics, research data, and reports provided by multiple stakeholders during the visit. She calls on the Netherlands to advance its efforts to prevent, promptly identify, and protect children from various forms of human trafficking and abuse. She urges the authorities to conduct robust supervision and vetting of staff of youth welfare and care institutions; stricter screening for indicators of trafficking and abuse; trafficking and exploitation awareness for the youth care sector and centers for unaccompanied children; and adequate reporting and early intervention mechanisms.
28. As mentioned in Section I, the Netherlands does not yet have a National Referral Mechanism. Formal identification of victims mostly takes place by law enforcement agencies, such as the Police, the Royal Netherlands Marechaussee (KMar), the Netherlands Labour Authority (NLA), and the Public Prosecution Service (OM). According to Dutch policy, all persons for whom there exists the “slightest indication” that they might be victims of trafficking must be registered as presumed victims. Specially trained and certified human trafficking detectives conduct informative interviews (intakes) to determine if this standard is met. Currently, victims do not receive legal assistance during this initial intake interview, even though the outcome has major legal consequences for their status and protection. The Immigration and Naturalisation Service (IND) plays a critical role in identifying victims among third-country nationals. All IND asylum interviewers are trained in child-friendly and trauma-informed interviewing techniques, and every IND unit handling asylum claims has a THB focal point trained to detect indicators of exploitation by applying the “working instructions” on referral for trafficking victims. Any indicator of human trafficking that the IND identifies in immigration cases (including asylum cases) are forwarded to the specialized trafficking police. Police conducts its own assessment of the indicator(s) and, if warranted, will invite the foreign national to an intake interview. During the intake interview, police may grant a reflection period of three months, based on even the “slightest indication” and informs the IND of this decision. In turn, IND grants potential victims in the Netherlands a deferral of the obligation to leave the Netherlands for as long as they are in the reflection period. In 2024, departures were postponed for less than 30 days on 30 occasions and for more than 30 days on 180 occasions. This is accompanied by access to

⁴⁴ [360 more teenagers disappear from Dutch refugee centres - DutchNews.nl](#)

⁴⁵ [ibid](#)

⁴⁶ [Young asylum seekers victim of 'exploitation, intimidation and violence' in the Baarn shelter - NRC](#)

⁴⁷ [Hefty prison sentences demanded against Ukrainian brothers who guided underage compatriots into prostitution - Rijnmond](#)

⁴⁸ [Sexual violence: Women and children unsafe in crowded shelters for Ukrainian refugees | NL Times](#)

⁴⁹ [Misbruik van jonge meisjes in de jeugdzorg door uitzendkrachten: hoe kon dit gebeuren? | de Volkskrant](#)

victim services, allowances benefits, and shelter for the presumed victim. Despite these structures, victim support organisations have criticized the procedure for identifying victims among asylum seekers as ineffective. Many victims are reportedly treated primarily as criminals or irregular migrants rather than victims needing protection. If victims without valid residence documents in the Netherlands decide during the reflection period to cooperate with the criminal investigation, they will be eligible after this reflection period for a temporary humanitarian residence permit for victims of human trafficking (B8). For Dublin claimants, an additional condition applies: they are only eligible for the B8-permit if the Public Prosecution Service deems the victim's presence necessary for the criminal prosecution. The B8-permit is granted for a maximum of one year and may be renewed for one year at a time as long as the criminal investigation is ongoing. If the criminal investigation is discontinued - for example, due to a dismissal of charges - the IND will also terminate the right of residence. In 2024, 220 applications were filed for the B8-permit, and 170 permits were granted. After three years of lawful residence based on the temporary B8-permit, victims can apply for a permanent humanitarian residence permit for continued residence, known as the B9-permit. This is also possible if the Public Prosecution Service decides to bring charges of human trafficking against a suspect, or under special circumstances such as the risk of reprisals upon return. In 2024, the B9 permit was applied for 40 times and granted 20 times⁵⁰. Victims who are unable to participate or who have valid reasons for not wishing to cooperate in the criminal proceedings may, in exceptional cases, also be eligible for a right of residence - the "hardship route." As in previous years, virtually no use was made of this route in 2024. In 2024, there were approximately 10 applications submitted, and fewer than 10 permits were granted. CoMensha is officially tasked and funded by the government to serve as the hotline and the national registration point for presumed victims. Law enforcement agencies (Police, KMar, and NLA) are legally required to notify CoMensha of all presumed victims they encounter. Other organizations, such as healthcare providers and civil society, are strongly encouraged to refer potential victims to CoMensha but are not mandated by law to do so. Registration by non-law enforcement actors is often hindered by strict interpretations of the General Data Protection Regulation (GDPR), as many organizations believe they must obtain a victim's explicit consent before sharing data with CoMensha, which often results in signals not being shared at all.

29. The Regional Care Coordinator (zorgcoördinator) system in the Netherlands is a decentralized framework designed to assist trafficking victims in navigating the path to recovery and justice. Since 2015, the responsibility for providing support and all types of assistance to trafficking victims has been delegated to individual municipalities, which appoint regional care coordinators who serve as the primary point of contact for victims, local authorities, and service providers. The network of care coordinators has expanded to approximately 35 coordinators who now cover nearly the entire country, meeting three times a year to share best practices and coordinate regional strategies. Their main function is to ensure that victims are assisted through the various processes required to access specialized care, safe shelter, and legal assistance, helping to bridge the gap between social services and law enforcement, often participating in multidisciplinary case consultations. Larger cities like Amsterdam and Rotterdam have highly developed systems where coordinators are available 24/7 to provide immediate assistance within 72 hours of an indication of trafficking. For instance, in Amsterdam, the coordinator also facilitates a roadmap for victims of criminal exploitation, ensuring they are connected to forensic youth care or intensive outpatient counselling. Some coordinators work alongside innovative programs like Turning Point (Keerpunt) and Spine, which use online outreach to reach potential victims who have not yet come to the attention of law enforcement. In regions where a dedicated care coordinator has not yet been appointed, CoMensha serves as the interim contact point and provides onboarding for new coordinators to ensure continuity of care. Because resources and priorities vary by municipality, the quality and quantity of support

⁵⁰ [Annual results Human Trafficking 2024 | National Rapporteur](#)

are not uniform across the country, with victims in the eastern regions of the Netherlands, for example, reportedly having more difficulty accessing specialized services compared to those in Amsterdam or The Hague. Furthermore, complex funding arrangements—where different beds in a single shelter might be paid for by different ministries or municipalities—result in cumbersome administrative procedures. There is a critical lack of specialized shelter places for adult males, families, and victims with complex needs such as mental health issues or substance use (OMM) – currently those exist only in four municipalities. The system of government-funded shelters (COSM) has been recently reformed and retendered – places for EU and non-EU victims are managed by CoMensha and available in Rotterdam, Amsterdam, Den Haag, and Vries, , with a taxi service to transport victims in the B8 reflection period to a COSM outside office hours. The regular shelter system for Dutch citizens is mostly geared towards victims of domestic and sexual violence, and problems with finding long-term places for other types of national victims persist. The Special Representative was informed about a lack of secured shelters for victims of forced criminality due to the nature of their exploitation, which in practice means that in many municipalities prisons and juvenile detention centres are considered to be the safest options to place such victims. In general, the appointment of regional coordinators has been a "key factor" in improving care, particularly for smaller municipalities that might otherwise lack the specialized facilities or a clear understanding of their legal responsibilities. At the same time, in some regions, coordinators change every two to three years, making it difficult to maintain long-term institutional knowledge and consistent trust with victims. While larger cities offer 24/7 coverage, in many other regions coordinators only work during standard business hours, making it extremely difficult for police to find safe placement for a victim identified during night shifts and weekends.

30. The Netherlands is currently undergoing a period of legislative and procedural reform to address these gaps, as the government is working towards a formal, multi-disciplinary NRM to be adopted and launched in 2026 to ensure immediate access to assistance and shelter. The Special Representative strongly encourages the adoption of the "social path" approach, where social actors would have a formal role in identifying victims, triggering assistance independently of their status in criminal proceedings. This would decouple victim protection from criminal justice cooperation, increasing the willingness of victims to enter the referral system. Adopting the "social path" approach would increase victim identification by expanding list of agencies which can formally identify victims. This approach would also prioritize the State's obligation to assist trafficking victims and uphold their rights, supporting long-term assistance and recovery, irrespective of a victim's ability or willingness to co-operate with law enforcement officials or the existence of a criminal case. At the same time, such assistance increases the likelihood of victims regaining their agency and participating in all aspects of society, including criminal proceedings, with the goal of bringing their traffickers to justice. This is also supported by the findings of the pilot project *"Towards a victim-oriented criminal process after exploitation,"* which evaluated the effectiveness of certain interventions aimed at increasing victim's willingness to report the crime⁵¹. Furthermore, the Special Representative hopes that formalizing the NRM with special provisions for child victims of trafficking will also clarify the responsibilities of individual agencies and strengthen the mandates of care and safety coordinators, which will ease and streamline quick provision of services to trafficking victims.
31. One important type of assistance to trafficking victims, which is often overlooked, is related to debt relief. Many victims are left with debts incurred through financial abuse, such as phone subscriptions or vehicle fines registered in their name by traffickers. Sexual exploitation is often accompanied by financial violence and criminal exploitation, for example, victims are forced to hand over their debit cards, which are used for money laundering, and perpetrators take out loans and subscriptions in victims' names. Research

⁵¹ [CKM - Eindrapportage proeftuin aangiftebereidheid](#)

into poverty and debt in violent dependent relationships also shows that victims of human trafficking are left with significant debt and other financial problems after a period of exploitation. In their report “*Starting with a clean slate*,”⁵² the NGOs CKM and Defense for Children Netherlands advocate for debt relief protocols to prevent re-exploitation, advising policymakers to address victims’ debts through the criminal prosecution of human traffickers, provide more support to victims in civil proceedings to get compensation, and better utilize the Violent Crimes Compensation Fund to support this specific group. They also urge better cooperation between care coordinators and the various types of creditors, such as telephone companies, banks, insurers, and government agencies, to strengthen their ability to recognize signs of exploitation and find sustainable solutions for debt relief for victims, reducing the risk of re-exploitation.

32. When discussing the provision of services to trafficking victims, many counterparts, both governmental and non-governmental, openly acknowledged the gaps in the current Dutch system. The Special Representative recommends increasing the continuity and consistency of services and safe shelters provided to all trafficking victims in all municipalities, especially in complex cases, providing sufficient resources for such services and training for all staff; adopting and implementing an NRM that would follow the “social path approach” would advance these goals. She further encourages the Netherlands to fulfil its international obligations to identify trafficking victims in migration flows and to provide them protection and assistance specific to their needs, including access to residency beyond the completion of criminal cases against their traffickers.

V. Investigation and prosecution of human trafficking

33. The number of investigations into trafficking in human beings has shown a general declining trend since 2022 (176 in 2021, 186 in 2022, 174 in 2023, and 146 in 2024), with a particularly sharp drop in cases related to sexual exploitation. The registration of cases at the Public Prosecutor’s Office (OM) has also decreased (261 in 2021, 214 in 2022, 219 in 2023, and 210 in 2024), and the annual target of 220 cases per year for police was not achieved in 2024. With the cases of criminal exploitation on the rise, several interlocutors met by the Special Representative during the meeting voiced concerns that the specialized police is not able to investigate all signals of human trafficking and needs to concentrate on those that will likely lead to court cases.
34. The law enforcement response to human trafficking in the Netherlands is the responsibility of four primary agencies: Police, KMar, the Investigations Department of the Netherlands Labour Authority (NLA), and the Public Prosecutor’s Office (OM). There are also several multi-agency initiatives, aimed at information-sharing and data gathering. Expertise Centre on Human Trafficking and People Smuggling (EMM) is a joint cooperation structure involving the Police, KMar, NLA, IND, and OM, and it serves as a central hub for pooling information and preparing operational, tactical, and strategic reports. Regional Information and Expertise Centers (RIEC) combine signals from healthcare, municipal supervision, and criminal investigations to create a comprehensive picture of trafficking at the local level. These bodies and structures are also supported by specialized units such as the Financial Intelligence Unit (FIU).
35. The National Police handles the majority of trafficking investigations, particularly those involving sexual and criminal exploitation. Each of the ten regional police units maintains an AVIM department, which includes a dedicated Immigration Crime and Human Trafficking Team (TMM). These teams are responsible for both reactive signal checks and proactive investigations. All Human Trafficking officers must undergo a mandatory 20-

⁵² [Met een schone lei beginnen](#)

week training at the Police Academy to become certified human trafficking detectives. Furthermore, in teams like The Hague TMM, approximately half of the officers are female, which is considered a best practice for interviewing female victims, who may be more comfortable speaking with a woman. Dutch police have implemented a few initiatives to address declining cases and the fast-developing methods of recruitment and exploitation online.

36. To tackle tech-facilitated trafficking, the Police established the National Coordination of Online Human Trafficking Signals (LCOM), which consists of specialists of tech-facilitated trafficking from each TMM and meets periodically to initiate, coordinate, and/or execute projects and actions to fight trafficking on online platforms. They use web crawlers and virtual agents to retrieve signals of exploitation from online platforms on the regular and dark web – a practice that will receive a clearer statutory basis in the Code of Criminal Procedure reform, set to enter into force in 2029. This helps with leading regional investigations - by filtering all ads by specific area codes, scanning thousands of sex advertisements on adult websites and applying indicators to prioritize those showing signs of human trafficking or involving minors. The police use virtual agents to make "client" appointments and once they meet the individual in person, they identify themselves as police to discuss the person's situation and assess for signs of exploitation. TMM units are currently also building and testing AI tools to search "big data" for indicators of trafficking. As reported by the interlocutors during the visit, around 25 per cent of all cases result from tech-facilitated investigatory measures. Another promising practice is the Domain- and Information-Driven Working Method (DIGW), introduced in 2022, which systematically scores and combines factual indicators from unrelated police reports. It involves an automated daily scan of various police information systems to filter out records, revealing potential victims who may have been overlooked in initial criminal reports. The Special Representative was encouraged by all the innovative initiatives implemented by the specialized police and hopes that these measures lead to an increase in number of prosecutions and convictions.
37. While the Police is responsible for 196 cases (93% of the total registered at the OM in 2024), the NLA handles the majority of labour exploitation investigations, although it only submits a few cases to OM annually. The NLA operates under the Ministry of Social Affairs and Employment and is divided into a Directorate of Supervision, which follows up on reports and conducts unannounced inspections, and a Directorate of Investigation, which conducts criminal investigations under the authority of the OM. As of 1 January 2023, a new specialized Labour Exploitation department was established to centralize and professionalize the criminal approach to these cases. In cases where the high criminal threshold for trafficking cannot be proven, the NLA handles matters administratively as a "serious disadvantage," allowing them to issue fines and stop business activities. While this allows for immediate intervention, it often leaves victims without the full legal status, specialized protection, or state compensation to which they would be entitled under trafficking charges. Statistical data shows that in 2024, the NLA received 285 signals of labour exploitation, yet only 6 investigations were completed and submitted to the Public Prosecutor. Investigations are profoundly hampered by a heavy reliance on victim testimony, which is often vague or inconsistent due to trauma, cultural differences, or fear of deportation. Reports of exploitation in domestic care, au pair, and household sectors quadrupled in 2024 but remain exceptionally difficult to investigate due to its invisibility. Domestic workers often live with their exploiters, work 24-hour shifts despite contracts claiming 40-hour weeks, and face immediate homelessness if they report abuses. Many victims in these sectors do not self-identify as victims or are reluctant to cooperate with state authorities, making it nearly impossible for investigators to verify actual working hours and wages. Furthermore, NLA investigators often face legal barriers when trying to enter crime scenes in private homes or on offshore vessels, where the most severe forms

of domestic servitude and exploitation occur. On the positive side, a commendable advancement is the NLA's use of "Crime Scripts" and "Intelligence Images," which includes mapping the criminal process as a "film script" and helps investigators identify the scenes, actors, and *modi operandi*, necessary to dismantle entire networks rather than pursuing isolated incidents. The Special Representative welcomes the strengthening of NLA's investigative mandate and the use of innovative methods, while urging additional measures to increase the prosecutions rate for labour exploitation cases.

38. The Public Prosecution Service (OM) distributes its anti-trafficking expertise across regional and national levels to ensure coverage and handle complex cases. There are approximately 20 specialized THB prosecutors in the Netherlands – at least one assigned to each of the 10 regional OM branches, at least one at each of the four Courts of Appeal, and several based at the National and Functional Prosecutor's Offices for the most serious cases. The National Coordinating Prosecutor on THB leads the service's efforts, oversees the development of policy and strategy, and chairs the Task Force Human Trafficking, a multidisciplinary body that coordinates the national integrated approach. The OM has identified forced criminality and tech-facilitated trafficking as priority areas; within the Functional Prosecutor's Office there is a specific department dedicated to labour exploitation. Prosecutors undergo regular training at the Training and Study Centre for the Judiciary, which offers both basic and in-depth courses on legal aspects, trauma-informed and victim-centered approaches, and compensation. The OM regularly issues and updates internal regulations, such as the Directive on THB (2022) and the Guideline for Criminal Procedure in Human Trafficking, which provide binding instructions on investigation priorities, mandatory financial investigations in THB cases, and how to calculate penalties. The OM supports the "Free in-Free out" principle, which ensures that victim's illegal migration status is not held against them if they come forward to report a crime, as well as prepares individual risk assessments for victims to provide protection during trials. As THB cases are becoming larger and more complex, the OM, in coordination with the police and other involved investigative services, determines which cases are prioritized, weighing where resources will have the greatest impact. In practice, this means that the choice is often made to pursue cases with potentially many victims and the greatest possible societal impact. The Special Representative welcomes the THB specialization of OM and the investigative bodies, as well as the leading role of the National Anti-trafficking Prosecutor in strengthening the national criminal justice response.
39. According to the National Rapporteur's 2024 Annual Figures⁵³, the number of convictions for human trafficking in the Netherlands has shown a general declining trend since 2021 (87 convictions in 2021, 54 in 2022, 53 in 2023, and 51 in 2024). This decline is linked to a restrictive interpretation of Article 273f by the Supreme Court, which has made it more difficult to prove the "intent to exploit," particularly in labour trafficking cases. In the St. John or "mushroom pickers" case⁵⁴ - a significant legal proceeding in the Netherlands involving the alleged labour exploitation of Polish workers in the mushroom cultivation industry - initially resulted in a conviction, but the decision was overturned on appeal by the 's-Hertogenbosch Court of Appeal. The court ruled that the breach of the workers' physical and mental integrity was not sufficiently serious to constitute "exploitation" under the legal threshold. A critical factor in the court's decision was that several workers had traveled back to Poland and subsequently returned to the Netherlands to work for the same employer again, which was interpreted as an indication that the work was voluntary rather than forced. The acquittal in the "mushroom pickers" case has had a significant effect on the Dutch anti-trafficking response, making the NLA and the OM more hesitant to bring labour exploitation cases to court for fear they will not meet the high evidentiary threshold. Because of the difficulty in proving human trafficking in such a context, many similar

⁵³ [Annual figures Human Trafficking 2024: number of underage victims of criminal exploitation rising | National Rapporteur](#)

⁵⁴ [ECLI:NL:GHSHE:2025:2730 Full text of judgment](#)

cases are now handled administratively as "serious disadvantage" (resulting in fines) rather than through criminal prosecution. Case law appears to signal a cautious shift, with the Supreme Court and Appellate Courts providing more concrete guidance on the evidentiary threshold for labour exploitation and, in some instances, adopting a less restrictive interpretation than in earlier rulings. This development may encourage investigative and prosecutorial authorities to bring forward labour exploitation cases more readily. In addition, a further increase in case inflow is anticipated in light of forthcoming legislative changes (see next para), which are expected to broaden the scope for criminal enforcement. While there were more than 100 forced criminality court cases between 2020 and 2025, further challenges remain in the prosecution cases related to trafficking for forced criminality, where the evidence in the cases needs to be built around the victim and not just on the victim's testimony to ensure personal safety and avoid the over-reliance on the victim's full cooperation with law enforcement, as well as the need for closer coordination between prosecutors and judges to achieve harmonized sentencing. The 2025 case law study by the National Rapporteur⁵⁵ raised significant regional differences in how trafficking cases were adjudicated between 2019 and 2023, noting that judges still used different review frameworks and criteria for assessing facts, and recommended better use of Prosecutor General's opinions and Supreme Court judgments to provide more robust reasoning for their decisions, which would enhance legal certainty for both victims and society.

40. Several steps have been taken to address such challenges in securing convictions through legislation and judicial structural changes. The primary response to the high evidentiary threshold is the modernization of Article 273f of DCC, which was approved by the House of Representatives in June 2025 and at the time of writing still awaiting Senate's adoption. The new legislative framework and its accompanying explanatory notes provide better guidance on the "means" element, emphasizing that a victim's perceived voluntariness is irrelevant if there is an Abuse of a Position of Vulnerability (APOV) or intent to exploit. To further minimize the inconsistency in how judges rule on human trafficking cases, the Dutch judiciary has introduced several unifying principles and guidelines. The LOVS (National Standing Conference on Substantive Aspects of Criminal Law) has established "Orientation Points for Sentencing," most recently updated in December 2024, which provide judges with non-binding but standard reference points to ensure more uniform punishments across different regions. Judges now use standardized frameworks, such as the "Rotterdam scales," to assess immaterial damages more consistently in trafficking cases. As reported during the visit, a new judicial practice group for judges of both first and second instances, supported by specialized legal officers, is creating draft wordings for sentences to unify the application of the law and create a shared "framework for assessment." This complements the regular expert group meetings of the specialized chambers for trafficking cases in Amsterdam and The Hague, which happen every three months to discuss challenges in jurisprudence and share recent case law findings. The Special Representative encourages the Netherlands to continue implementing these and further measures to improve judicial outcomes in trafficking cases, including by introducing the specialization in human trafficking for judges in all districts of the country.
41. The application of the non-punishment provision is a key protection factor for trafficking victims and one of the main issues discussed with a wide range of interlocutors during the country visit. Currently, prosecutors may exercise discretion to waive prosecution for victims of trafficking under Sections 167(2) and 242(2) of the Criminal Procedure Code on public interest grounds. They may apply "code 06" when the individual committed the crime under duress, which results in complete dismissal of charges. Alternatively, "code 42" (low punishability) applies when the crime is directly linked to the trafficking situation, making prosecution inadvisable even though non-punishment in strict legal terms

⁵⁵ [Developing through insight, case law research on human trafficking 2019 - 2023 | National Rapporteur](#)

does not fully apply. Additionally, the Prosecutor General's *Designation of dismissal and use of dismissal grounds*⁵⁶ clarifies that victims coerced into offenses may either have their cases dismissed outright or be convicted without punishment or with reduced sentences. Furthermore, according to Section 9a of the DCC, the non-punishment principle can also be given effect through a court verdict. In the event that a victim is prosecuted for a punishable offence and the court regards him/her as guilty, the court may nonetheless decide, given the circumstances, not to impose a punishment. Notwithstanding the existing legal and policy framework, the actual application of the prosecutorial discretion has been inconsistent. In its 2024 report on the application of the non-punishment principle⁵⁷, La Strada evaluates a 2021 case provided by the NGO FairWork, in which the Amsterdam District Court did not apply the NPP despite indications of forced labour, but only lessened the sentence, and the victims were not identified as such (prison sentences were issued for producing cocaine in the riding school Nijeveen). A 2022 report by CKM⁵⁸ found that the discretion to waive prosecution was rarely used by the OM and concluded that it is unclear how often and in what way the non-punishment principle is applied within the criminal justice system, which also creates uncertainty about when and to what extent victims can successfully invoke it. The Public Prosecution Service asserted the non-punishment principle is applied in practice on a relatively frequent basis, but that its use cannot be readily extracted from existing registration systems due to the absence of systematic recording. It has further acknowledged room for improvement in ensuring a more uniform and verifiable application of the principle and noted that the relevant Directive is currently under review to that end. This is especially important in cases of trafficking for forced criminality, but seems to be difficult in implementation due to the frequent "victim-offender" nexus. Victims of forced criminality are often misidentified as suspects and prosecuted for crimes committed as a direct result of their exploitation. Even if front-line responding state officials recognize signs of coercion and exploitation, they are often hesitant to treat victims as such, e.g. reportedly some social workers are providing assistance to the victim without formally starting criminal procedure against the actual perpetrator to keep the victim safe. In several cases, to "protect" the victim from retaliation from criminal networks, and also due to victims not self-identifying as such, the police would charge them for the crime they were compelled to commit and try to gather alternative evidence around the victim's testimony. Another issue that came up during the discussions is how the law enforcement is obliged to investigate and prosecute all crimes, which results in parallel processes, where one person is charged for a criminal offence, at the same time being a victim in a process of THB for forced criminality⁵⁹. This creates a lot of insecurity for victims and burdens the overloaded criminal justice system. The adoption of a dedicated non-punishment provision, and interpreting it as "non-prosecution" as opposed to "non-punishability" would create legal certainty and ease the workload of law enforcement. The Special Representative urges the Netherlands to adopt the dedicated provision without delay, and accompany its implementation by comprehensive instructions on non-prosecution of trafficking victims for crimes related to their trafficking to guide various specialized and non-specialized law enforcement bodies, including in criminal fields such as drug criminality, juvenile delinquency, cyber police etc., and conduct regular monitoring and reporting on implementation.

42. When the application of the non-punishment provision fails, victims are wrongfully convicted and are left with criminal and administrative records, restricting their opportunities for employment, obtaining bank credits, or even creating difficulties with house-seeking or regularizing their residence status. The Dutch legal system does not provide possibilities for criminal record or administrative fine relief, the only option being

⁵⁶ wetten.nl - Regulation - Designation of dismissal and use of dismissal grounds - BWBR0046770

⁵⁷ 3636-LSI_Non_Punishment_Report2025.pdf

⁵⁸ CKM - Kijken met andere ogen

⁵⁹ Jongeren die geronseld worden weten vaak niet waar ze 'ja' op zeggen - Omroep Brabant: het laatste nieuws uit Brabant, sport en informatie uit jouw regio.

reconsideration of judicial case due to new circumstances. Given that many trafficking victims are convicted for the crimes they were compelled to commit, even if their sentences are low or none, the criminal record remains, with a lasting impact on the lives of victims and heightening the risks of re-victimization. The Special Representative encourages the Netherlands to consider introducing legal provisions and mechanisms for criminal and administrative records relief for trafficking victims and stands ready to provide further guidance and assistance on the issue.

43. The Dutch Financial Intelligence Unit (FIU-Nederland) plays an important and active role in combating trafficking by tracing the financial flows linked to the crime. The FIU has two operational analysts assigned to THB that work closely with the Police and NLA. The FIU focuses on two main trafficking typologies in their analyses and information received from the law enforcement: sex and labour trafficking, which is also reflected in its 2024 Annual Report⁶⁰. It disseminates the knowledge with reporting entities through FIU alerts and information sessions. Files on suspicious transactions related to sexual exploitation are shared with the relevant regional police investigation services and the suspicious transactions related to labour exploitation are being specifically passed on to the NLA. The Fintel Alliance, connected to the Serious Crime and Terrorism Task Forces is Netherlands's public-private partnership (PPP) that co-locates the FIU and six major banks (ABN AMRO, ING, Rabobank, Volksbank, AEGON, and Triodos Bank) under the anti-money-laundering legislation to share and exchange data. It effectively uses financial data and dedicated 26 "red flag indicators" to detect illicit financial flows linked to trafficking. The alliance supports proactive investigations, information-sharing initiatives, and collaborative Field Labs examining trends such as Eastern European and Latin American sexual exploitation networks. Their work has contributed to investigations and convictions linked to trafficking facilitators in the Netherlands.

In 2015, the COMCRIM project—a unique public-private consortium of 22 partners, including four universities, ministries, banks, law enforcement and intelligence agencies, NGOs, and network organizations—was launched to use financial data methods for proactive detection, follow financial flows, and map criminal networks.⁶¹ Due to its success in detecting labour trafficking, the project expanded to more banks in 2022 and now includes researchers from four universities, funded by the Dutch Research Organization. Currently, the FIU is developing new typology indicators to detect forced criminality and forced benefit fraud committed by young people. The reporting entities observe transactions made by and on behalf of unexperienced and vulnerable group of victims, which result in de-risking and de-banking of individuals making their future financial life extremely difficult. While the Dutch FIU remains one of the most active and promising examples of partnership-led anti-trafficking work in the OSCE region, major challenges remain to leverage its full power, including limited investigative capacity, legal restrictions on data sharing, insufficient feedback between authorities and financial institutions, and difficulties distinguishing financial intelligence from admissible criminal evidence. Another key challenge is the lack of comprehensive financial *modus operandi* analysis in trafficking cases, while banks and law enforcement often face competing operational priorities. The Special Representative applauds the leading work of the Dutch FIU in the area of financial investigations into serious and organized crime, as well as the formalized structure of the Fintel Alliance, which allows it to track and report illicit financial flows connected to THB. She encourages the Dutch banks to develop internal policies on clearing of debts and financial inclusion for THB victims, and stands ready to provide assistance. She further invites the Netherlands to intensify the investigations detecting the digital and financial footprints of victims and perpetrators following the

⁶⁰ [FIU-annual-review-2024.pdf](#)

⁶¹ [What is COMCRIM? | COMCRIM](#)

recently issued guidance⁶² by examining virtual transactions linked to trafficking particularly for the purpose of exploitation in criminal activities and online sexual exploitation of children.

44. Overall, the Special Representative assesses the specialization on THB of law enforcement, prosecution, and adjudication bodies at all levels as a solid basis for bringing perpetrators to justice. At the same time, to address the significant discrepancy between the number of launched investigations and final convictions, particularly in labour exploitation cases, she encourages measures to ensure that trafficking crimes are classified correctly, rather than being reclassified as lesser offenses like migrant smuggling or labour violations; and early engagement between police and prosecutors to secure the necessary evidence to meet the high criminal threshold for "intent to exploit." In the cases of forced criminality she recommends improving the coordination between regular district prosecutors and specialized THB prosecutors on cases where crimes (such as drug running or placing explosives) were committed under exploitation; and ensuring that criminal investigations into forced criminality are built around the victim using diverse evidence (digital, financial) rather than relying solely on the victim's testimony, which is often difficult to obtain due to fear of retaliation. With the expected codification of the NPP into Dutch law, the Special Representative calls for robust efforts to train all actors in the criminal justice chain - practitioners at all levels should be provided with SOPs and practical guidance to ensure the principle is applied consistently, especially in the case of "victim-offender" overlap.

VI. Prevention of human trafficking

45. The Special Representative is encouraged by the Dutch enhanced efforts to prevent trafficking in human beings in a multi-stakeholder approach. A multitude of commendable innovative outreach campaigns by various actors, training for various professional groups including educators and healthcare staff, joint prevention programs, and oversight initiatives of high-risk sectors and locations, such as ports or places of prostitution, are positive examples.
46. The Netherlands is leading in the area of prevention of criminal exploitation with innovative targeted campaigns. Its umbrella "Prevention with Authority" €250 million program targets vulnerable youth (ages 8–27) in high-risk neighborhoods, using mentors and "experts by experience" to build resilience against gang recruitment. The program builds on good cooperation between the judicial bodies and municipalities, is specific for each location and is structured around five themes – work, school, family, street, and online space. Currently, 27 municipalities participate in the structural approach on a permanent basis, with further 20 municipalities receiving temporary support⁶³. For example, the municipality of Amsterdam developed a few innovative initiatives within the framework of the "Roadmap for Criminal Exploitation," an essential tool, aimed at ensuring that minors forced into "geldezel" (money mule) activities or drug transport are treated as victims rather than suspects, such as the Intensive Forensic Approach (IFA) for high-risk recidivism and the Intensive Preventive Approach (IPA) for early intervention in youth aged 12-23. The approach focuses on breaking the criminal cycle through intensive outpatient guidance that meets the young person where they are and can be combined with addiction care and probation services. A primary goal is to improve the youth's social prospects and offer a path toward resocialization, acknowledging that many were involved in crime before being exploited. The program is implemented by organizations like Levvel and incorporates specific expertise to handle complex cases, like young people with intellectual disabilities, who are identified as being at particularly high risk for recruitment

⁶² [Following the money 2.0 - A collaborative approach to human trafficking investigations involving virtual assets | Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings](#)

⁶³ [Preventing youth crime that undermines society | Crime that undermines society | Government.nl](#)

into criminal networks. Another promising regional example is an initiative by the Port Alliance Rotterdam⁶⁴: to make young people more resilient to being recruitment for criminal commissions and educate them on the psychological pressure and dangers of working for drug cartels in the harbor, the "Cocaine Collectors" (CoCo) intervention was developed with the use of VR technology in collaboration with the TNO research institute for scientific substantiation and the youth work organization JOZ. The opinions and experiences of young people from Rotterdam also played a significant role in shaping the program, as they were involved throughout the entire intervention development process. The program also involves outreach to schools and parents as components. Some of the innovative outreach and prevention activities are carried out by NGOs with funding from the Ministry of Justice and Security in the framework of the NAP. Run by the CKM, the Keerpunt (Turning Point) platform provides an anonymous chat with certified psychological and youth care professionals for individuals pressured into crime. Started as a pilot in February 2024, the chat had 516 visits in 2025 alone. In that period, 210 chat visitors asked for support regarding criminal legislation or criminal networks, 50 were confirmed cases of criminal exploitation, and one case of criminal and sexual exploitation. Simultaneously, the partner NGO Spine uses forensic IT to reach out to potential victims on Telegram and Snapchat before they are formally identified. In 2025, a total of 3,484 initial messages were sent out on Telegram, of which 333 messages were successfully delivered and 51 responses obtained. Importantly, also non-trafficking-specialized governmental programs, such as the recently released National Framework for Action in Attacks with Explosives,⁶⁵ acknowledge that youth who become involved in this are regularly deployed under heavy pressure or coercion and are often very young, hence the central place within the action framework was given to prevention, early detection, and cooperation. As trafficking for forced criminality is on the rise in the Netherlands and worldwide, the Special Representative was encouraged to see several targeted and innovative outreach and prevention activities at the regional and national level, which could serve as good examples for other participating States seeking to address this form of crime.

47. The Special Representative also appreciated learning about the numerous training and awareness building initiatives for professionals in sectors, not regularly involved in anti-trafficking activities. For example, the NGO FairWork in cooperation with CoMensha has developed a toolkit for general practitioners⁶⁶ and free e-learning for all medical professionals⁶⁷ to recognize "stille signalen" (silent signals) of trafficking in clinical settings, and on the skills needed to respond to signs or suspicions of human trafficking. The toolkit identifies specific physical and psychological markers, such as traumatic injuries inconsistent with patient stories, "voodoo" or ownership branding, and specific surgical scars (e.g., breast augmentations in the context of sexual exploitation); and it has already led to a few success stories – a victim held as a "domestic slave" was only identified after presenting with a broken back and fork-stab wounds - injuries that medical staff correctly identified as incompatible with a "fall from the stairs." The above-mentioned NGOs, as well as others such as Red Cross Netherlands, Fier, and Defence for Children, are delivering regular training sessions on THB for municipal care coordinators, professionals at safe houses, centers for unaccompanied minors, and residential centers for children and youth, and even housing corporation employees and district managers, making sure that trafficking victims can be identified and referred by as broad a group of professionals as possible. The Special Representative lauds these efforts to educate as many people as possible on the signs on trafficking and referral pathways and encourages the Netherlands to consider making such training obligatory for certain professional

⁶⁴ [Home - Port Alliance Rotterdam](#)

⁶⁵ [National framework for action in the event of attacks with explosives | Rijksoverheid.nl](#)

⁶⁶ [30767_Fairwork_ToolkitHuisartsen_INT13.pdf](#)

⁶⁷ [Leer, Signaleer, Alarmeer - Overview](#)

groups, such as youth workers, care providers in centers for unaccompanied children, and school psychologists.

48. To prevent labour exploitation, the Netherlands is implementing a comprehensive strategy, that includes increased structural oversight of high-risk sectors like temporary employment and targeted awareness campaigns for vulnerable groups. The Provision of Personnel Admission Act (Wtta), which came to force in January 2026, introduces a mandatory authorization system for all 15,000+ temporary work agencies: to operate, they must provide a certificate of good conduct (VOG), a financial deposit, and proof of correct wage and tax payments. To oversee and monitor implementation, the NLA received an additional €50 million annually for anti-trafficking efforts. Following reports of extreme abuses, the government is furthermore considering a ban on all temporary agency work in the meat processing industry due to its status as a high-risk sector. In some municipalities, like Rotterdam and Dordrecht, Regional Human Trafficking Control Teams (RCTM) have been established for joint inspections with the NLA and police. The initiative "Work in NL" (WIN)⁶⁸ specifically addresses the needs of migrant workers who may be unaware of their rights or dependent on employers for housing and transport. Run as a public-private alliance, it coordinates with housing parties for emergency housing and assists victims in finding safer pathways, prevents labor exploitation and assists victims through a network of information and support services. The official website is available in nine languages and is a comprehensive information platform, launched by the Dutch authorities to protect and inform migrant workers in the Netherlands. The 28 WIN information points - physical, low-threshold centers established across the country - are overseen by the Ministry of Social Affairs and Employment and are staffed by workers, who often come from the same background as the targeted populations, to establish trust and promote cultural sensitivity. The employees at these points are also trained by FairWork to recognize the "silent signals" of human trafficking and serious labor abuses. Some further targeted prevention initiatives are the "Out of the Shadows" campaign, created by the Red Cross and FairWork specifically for undocumented workers, using videos in 13 languages to emphasize that everyone has labor rights, regardless of residency status. The Special Representative welcomes the broad mandate and the active involvement of the NLA in preventing and identifying labour exploitation and trafficking as a good practice and encourages authorities to continue providing resources and specialized training to the agency, with particular focus on vulnerable sectors. She would like to be kept updated on the progress with regards to the new system of oversight of recruitment agencies and punitive actions to ban agencies that facilitate THB and hold them criminally accountable.
49. In the area of curbing demand that fosters trafficking for the purpose of sexual exploitation and preventing sex trafficking, while both buying and selling sex is legal, the Netherlands has criminalized the known use of services of trafficking victims (albeit with ineffective enforcement), implemented several awareness campaigns and exit programs, and made efforts towards structural oversight of the sex industry. For example, "Will you lend a hand"⁶⁹ is a joint initiative by 25 municipalities in the Rotterdam region to raise awareness about child trafficking, including for sexual exploitation, and the NGO Fier/Keerpunt provides a chatroom for anonymous contact. The "Don't look away"⁷⁰ campaign urges travelers to be alert and report suspected cases of child sexual abuse, even abroad, while the "You Can Cross Any Border, But Not This One!"⁷¹ campaign targets Dutch men travelling to or staying in selected high-risk countries, including the Philippines and Thailand, with the aim of preventing child sexual exploitation before it occurs. The campaign raises awareness that help is available and that Offlimits can support individuals in stopping this behavior. It

⁶⁸ [Home | WorkinNL](#)

⁶⁹ [HOME | Will you hold out your hand | Worried about yourself or someone else? | Call FIER!](#)

⁷⁰ [dontlookaway.nl](#)

⁷¹ [Launch of Campaign Against Transnational Child Sexual Abuse | Off-limits](#)

is estimated that at least 20,000 Dutch men travel abroad every year and engage in child sexual abuse, according to recent research⁷². The *National Guideline for Professionalizing Supervision of the Sex Industry*⁷³, released in September 2025 by the Association of Dutch Municipalities together with the police and OM, aims to identify victims of THB and exploitation and clarify the roles and responsibilities of all actors. At the same time, the Guideline is not a legally binding document and would need strict enforcement in all parts of the country. As a part of the new coalition agreement, the government plans to raise the minimum legal age for commercial sex or prostitution from 18 to 21 and introduce a “pimping ban” to penalize abusive facilitators in the commercial sex industry who take advantage of vulnerable persons.⁷⁴ Exit programs for persons wishing to exit prostitution and trafficking victims are currently run in 18 Dutch municipalities, funded by the Decentralization of Benefits for Exit Programs for Prostitutes (DUUP) instrument. These programs focus on intensive support toward alternative livelihoods, with a focus on safety, care, and sustainable reintegration, which can include assistance with debt management, vocational training or loans to start a small business. Participants may also be offered temporary stay in “homely” environments or “Consideration Houses” (such as the one in Groningen) where they can safely plan for their future. While traditionally focused on in-person commercial sex, some cities like Amsterdam have expanded their exit programs to include individuals involved in digital sexual services, such as webcamming and OnlyFans. At the same time, despite being a national program, reportedly some municipalities have previously pulled out of the DUUP scheme due to high costs or insufficient resources for “multi-problem” victims who require more intensive care. One of the main challenges to the success of the exit programs is the debt trap, as many participants have accumulated significant debts with tax agencies or have not been able to save enough to support themselves during the transition.

50. When it comes to prevention programs targeting potential offenders, the Special Representative was not made aware of any special interventions for buyers of adult sexual services who could potentially come in contact with trafficking victims. A 2021 study by the Netherlands Institute for the Study of Crime and Law Enforcement (NSCR) surveyed 422 clients of sexual services in the Netherlands to assess their ability to recognize exploitation and their subsequent willingness to report it. The research found that buyers were generally able to describe many indications of sexual exploitation but were not willing or able to report suspected cases of trafficking to the authorities. During the visit, police and regional supervisors noted that they rarely receive reports from third parties or clients themselves, which they attribute in part to the stigma and shame associated with the sector. In an effort to address this, in 2022 the Netherlands introduced Art. 273g DCC to target the clients, knowingly using sexual services from victims of exploitation; at the same time, the first conviction was achieved under this article only in 2025. As the “known use” element is extremely difficult to prove in court, the Special Representative recommends that the Netherlands consider amending legislation to criminalize the purchase of sexual services of trafficking victims regardless of their knowledge as an effective measure to curb the demand for sexual exploitation.
51. The Netherlands has several positive initiatives targeting child sexual exploitation, such as by the NGO Offlimits⁷⁵, which operates a hotline for reporting CSAM and was recently appointed an official trusted flagger, a helpline for victims of online abuse and harassment, as well as for persons who are concerned about their sexual feelings and/or behavior toward minors. According to its data, around 7000 people in 2025 approached Offlimits as victims of online abuse, 300 of them were victims of sexual extortion, both children and adults.

⁷² [Risicotaxatie bij plegers van transnationaal seksueel kindermisbruik](#)

⁷³ [National Guideline for Professionalising Supervision of the Sex Industry](#)

⁷⁴ [Cabinet wants to tighten ban on pimps, and raise legal sex work age to 21 | NL Times](#)

⁷⁵ [Home | Off-limits](#)

Very often online apps such as Nudify are used to create AI images of victims and coerce them into sexual acts or various other acts, or to create CSAM based on the images of real children. While the Dutch legal framework is largely adequate, research⁷⁶ identified a critical "bottleneck" in oversight and enforcement caused by a lack of funding, specialized knowledge, and institutional priority. Detailed interviews with regulators like the Data Protection Authority (DPA) and the Authority for Consumers and Markets (ACM) revealed a fragmented landscape where victims are often left without a swift remedy because no single agency has a clear mandate to intervene, and the need for active systemic supervision—similar to broadcast television standards—supported with the necessary budget and coordination to treat digital violations with the same urgency as physical crimes. The Special Representative supports the calls for strengthened digital platform liability and recommends establishing structural policies and enforcement mechanisms to hold online platforms and apps similar to Nudify accountable for hosting illegal content and require 100 percent age and consent verification on adult sexual services websites.

52. In conclusion, while positively noting the commitment and numerous steps taken in the prevention of trafficking by the Dutch authorities, particularly through targeted prevention and outreach interventions and awareness campaigns, the Special Representative encourages authorities to continue their efforts and invites them to consider the following recommendations to enhance the implementation of OSCE anti-trafficking commitments, in particular the OSCE Action Plan to Combat Trafficking in Human Beings and its Addendum. The Special Representative and her Office stand ready to provide technical assistance, if requested, to national, regional, and local authorities, as well as civil society and survivor leaders; and she welcomes further dialogue and co-operation to promote appropriate follow-up to these recommendations.

VII. Recommendations

1. Enhance legal, policy and institutional framework by:

- **Adopting and implementing the ongoing legislative reform of the Article 273f of the Dutch Criminal Code, including codifying the non-punishment principle.**
- **Establishing clear roles and responsibilities for all anti-trafficking actors, including the Financial Intelligence Unit, and strengthening the mandate of the NAC by placing the coordination at a higher level in the government.**
- **Formalizing the role of the “Mirror Group” as the National Survivor Advisory Council with the relevant strong mandate.**
- Developing and adopting the next NAP, focusing on specific actions to address increasing online exploitation of children and adults; establishing partnerships with private entities such as technology companies to develop specific tools and strategies; continuing research and awareness-raising on various forms of trafficking, such as exploitation for criminal activities; promoting partnerships with financial intelligence by including the Financial Intelligence Unit and financial regulators in anti-trafficking co-ordination mechanisms as crucial NAP stakeholders with specific tasks assigned to follow, identify, and disclose illicit financial flows related to trafficking; and enhancing prevention efforts, by curbing demand for sexual exploitation by legislative and policy measures and through education initiatives, programs aimed at youth criminality prevention.
- Ratifying the Domestic Workers Convention No. 189, as well as the International Convention on the Protection of the Rights of all Migrant Workers and Members of their Families.

⁷⁶ [rapport-nudify-websites.pdf](#)

2. Enhance victim identification, assistance, and protection by:

- **Developing and launching an NRM that regulates the actions of each agency that might come in contact with a trafficking victim (including labour inspectors, healthcare, education, and child protection authorities) and contributes to an improved and effective protection scheme through adopting a “social path approach.”** Implementing mandatory training on trauma-informed approaches to identification and referral of victims of various forms of trafficking for relevant authorities, especially front-line police officers, healthcare and social workers, teachers, and staff of child welfare institutions.
- **Enhancing measures to identify victims of all forms of human trafficking and child trafficking, particularly of labour exploitation, forced criminality, and online child sexual exploitation, and by increasing proactive activities throughout the country including through screening at-risk children and youth, issuing guidance and mandatory training for frontline law enforcement and youth care workers on trafficking for exploitation in criminal activities, creating protection programs for children in all types of institutions with special attention to those who go missing and age out and unaccompanied boys and girls.**
- **Streamlining the provision of specialized services to all trafficking victims across the country to ensure the continuity and consistency of services, including in complex cases, and providing safe shelter and accommodation for all categories of victims, especially to victims of forced criminality.**
- Enhancing financial inclusion and debt relief for trafficking victims by developing national protocols to help victims expunge debts incurred during exploitation and regain access to the financial system.

3. Enhance the criminal justice response to all forms of human trafficking by:

- **Boosting THB investigations by using the “following the money” approach through closer partnership and data sharing with FIU Nederland and focusing on emerging and increasing digital payment systems.**
- **Increasing the number of investigations and prosecutions for labour exploitation** including through collaboration between the investigative branch of the NLA and the prosecution service.
- **Once adopted into law, issuing guidance on the application of the non-punishment principle with regards to victims of trafficking for exploitation in criminal activities and conducting training and awareness-raising for all criminal justice practitioners and the judiciary,** as well as developing a monitoring tool to document cases where NPP was applied and/or rejected in various stages of the criminal justice process.
- Ensuring the anti-trafficking police and specialized prosecution service are sufficiently resourced to investigate and prosecute all cases of human trafficking, without having to drop cases with smaller numbers of victims or lesser chance to secure convictions.
- Boosting convictions by the introducing judicial specialization in all districts of the country and ensuring application of the unifying sentencing guidelines.

4. Enhance prevention of human trafficking by:

- **Increasing and supporting targeted prevention measures by focusing on the demand that fosters all forms of trafficking, including through: amending the criminal law to criminalize the purchase of services from a victim of trafficking, regardless of knowledge, and pairing implementation of criminal justice measures with education initiatives for young men and boys.**
- **Strengthening the structural oversight of digital platforms by holding online platforms and Nudify-like apps accountable for hosting illegal content, requiring**

100% age and consent verification on adult sexual services websites and introducing punitive measures in case of non-compliance.

- Developing and implementing ethical recruitment guidelines for various sectors and exercising rigorous oversight over the work of recruitment and employment agencies, including by holding agencies that facilitate trafficking criminally accountable.
- Establishing mandatory training for the staff of all types of child protection institutions (including for unaccompanied children) and institutions for children in conflict with the law on all types of trafficking, especially THB for forced criminality.

Annex I – Agenda of the visit

19 September 2025 – online meeting with the anti-trafficking NGOs and lived experience experts

20 October 2025 – online meeting with anti-trafficking lawyers

27 October 2025

From	To	Interlocutor
0900	1000	Comensha
1015	1130	Ministry of Justice and Security
1130	1230	Ministry of Foreign Affairs
1300	1400	Ministry for Social Affairs – Director General for Work
1500	1530	Minister for Justice and Security
1630	1730	Head of the Dutch Labour Inspection

28 October 2025

From	To	Interlocutor
0900	1000	Dutch National Police
1015	1130	IND/Migration authorities
1130	1230	National Labour Authority and Ministry of Social Affairs and Work
1330	1445	Dutch Nationaal Rapporteur
1500	1600	Ministry of Health, Welfare and Sports, Association of Netherlands Municipalities, Directorate-General for Punishment and Protection, Compensation Fund for victims of violent or sexual crime
1615	1715	Judges

29 October 2025

From	To	Interlocutor
0930	1100	Rotterdam municipality
1130	1230	Rotterdam police
1330	1530	Fier / CKM / Keerpunt

30 October 2026

From	To	Interlocutor
0900	1000	Ministry of Justice, National Coordination team

1330	1500	Financial Intelligence Unit and Fintel Alliance
1600	1700	TikTok, Offlimits

31 October 2026

From	To	Interlocutor
0900	1100	Amsterdam municipality
1130	1300	Fairwork, La Strada, Leger des Heils/Salvation Army, Red Cross

13 November 2026 – online meeting with the National Coordinating Anti-trafficking Prosecutor