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

SURVEY REPORT 2026

Tracking Implementation of the OSCE
Commitments and Recommended Actions
to Combat Trafficking in Human Beings

https://arcg.is/eSPrj0

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Foreword

Over the past 25 years, since the adoption of the Palermo Protocol and OSCE anti-trafficking commitments, participating States have taken important steps to combat human trafficking, strengthening prevention, protection, prosecution, and partnerships. Legislative frameworks have expanded and institutional mechanisms have matured, reflecting awareness of trafficking as a complex and evolving crime. It is also clear that criminals constantly adapt their methods and find new ways to exploit victims. In this context key questions emerge: Are these efforts translating into meaningful progress for victims and survivors? Are laws, policies, and practices in the OSCE region keeping up with trafficking trends and evolving methods and forms of exploitation? Are we moving closer to our shared goal of ending human trafficking across the OSCE region?

In line with my mandate as Special Representative and Co-ordinator for Combating Trafficking in Human Beings (CTHB), my Office works hard to advance implementation of OSCE anti-trafficking commitments across the region and assist participating States to do so. A key way we do this is through cutting edge research on the latest trafficking trends and methods, coupled with rigorous monitoring and evaluation. Measuring progress toward OSCE anti-trafficking commitments and identifying areas that need further improvement are critical, providing the evidence base for our efforts and to inform the development and implementation of more effective policies and practices.

In 2015-2016, the OSR/CTHB conducted its first comprehensive survey to assess the implementation of OSCE commitments and recommendations in the region, grounded in the 2003 OSCE Action Plan to Combat Trafficking in Human Beings, its 2005 and 2013 Addenda, and several Ministerial Council Decisions. The 2020/21 Survey provided an updated baseline and further consolidated the practice of monitoring and analysing progress at regular five-year intervals.

Building on previous editions, the 2025/26 Survey tracks developments in the OSCE region and provides a structured, comparative overview of progress. Key pillars of national responses are examined, including labour exploitation and child trafficking, victim identification and assistance, capacity-building, criminal justice response

and safeguards, and financial investigations. It also analyses cross-cutting developments such as the impact of new technologies and the consequences of major crises, including the war in Ukraine. For the first time, it was possible to complete the Survey questionnaire both online and offline, enhancing our technical capabilities to analyse the data. This is also the first time that the Survey Report is complemented by an interactive online platform, designed to enhance accessibility and allow users to explore data and trends across the OSCE region in a more dynamic and user-friendly way. As with previous editions, the Report aims to provide an evidence base to support dialogue, policy development, and practical implementation.

The Survey findings demonstrate clearly that States have increasingly transitioned towards protection-centred governance and enhanced law enforcement efforts. In the last five years they initiated far more trafficking investigations, notably related to online sexual exploitation and for criminal exploitation or forced criminality. Yet a persistent 'implementation gap' remains between legislative advancement and practical enforcement, notably related to child trafficking, demand reduction, and victim/survivor protections including application of the non-punishment principle. In most pS, proactive prevention of online sexual exploitation of children lags behind reactive content removal. While more pS had legal provisions for victim identification and assistance is increasingly delinked from criminal justice processes on paper, in practice more victims turned to self-identification and States increasingly terminated victim status and protection. Both gaps in victim assistance for children and men and disparities in protection for foreign victims, including access to remedy

Acknowledgments

and compensation, persisted. Structural and geographic barriers suggest that victims' recovery is often determined by their location and legal status rather than their actual needs. States increasingly used non-trafficking statutes to secure convictions, with persistent over-reliance on victim testimony and significant gaps in targeting high-level actors within organized criminal networks.

Overall, the Report illustrates that States' laws, policies, and tools are progressing but not keeping up with the latest trends or adapting as fast as criminals, especially in the areas of technology and financial flows. States identified a significant digital divide between traffickers' increasing misuse of technology and law enforcement's technological tools and know-how to build and use digital and financial evidence. The findings indicate that the 'follow the money' strategy is being standardized in policy but remains under-utilized as an investigative tool; and while the legal tools for asset recovery are largely in place, their practical application for the benefit of survivors remains very limited. More pS have mandatory human rights due diligence laws and procurement policies to prevent THB in supply chains, although monitoring and enforcement remain limited.

We clearly have more work to do: enhanced and sustained action is still required across prevention, protection, and prosecution efforts. This Report helps show us the way to do so. To support participating States in scaling up their responses, the Survey proposes specific and forward-looking recommendations to both participating States and the broader anti-trafficking community, as well as examples of promising practices. The OSCE stands ready to assist participating States and other stakeholders implement these recommendations and advance OSCE anti-trafficking commitments. Together we can innovate and adapt so that our efforts are more effective and bring measurable progress to ensure victims are protected in a meaningful way and traffickers are brought to justice and toward a region without human trafficking.

Dr. Kari Johnstone
OSCE Special Representative and
Co-ordinator for Combating
Human Trafficking

I would like to sincerely thank all OSCE participating States for their leadership in providing clear anti-trafficking commitments, their many efforts to implement them, and their collaboration with my Office and others in the OSCE to combat human trafficking and protect victims. This Report demonstrates important strides across the region, despite competing demands on political leaders' attention and resource constraints.

Introduction

Background

In line with MC.DEC/7/13, the Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings (OSR/CTHB) promotes the implementation of OSCE anti-trafficking commitments and assists participating States (pS) in their implementation upon request. In 2015-2016 and 2020-2021, the OSR/CTHB conducted surveys to assess progress made in the OSCE region towards implementing the OSCE anti-trafficking commitments, as laid out in the OSCE Action Plan to Combat Trafficking in Human Beings (2003) and the Addendum to the OSCE Action Plan to Combat Trafficking in Human Beings: One Decade Later (2013).

The survey addressed gaps in knowledge regarding the status of human trafficking and national responses in the OSCE region in line with the OSR/CTHB's goal of promoting evidence-based policies and programmes. This 2025/26 follow-up survey has been developed for the purpose of tracking progress made towards the implementation of CTHB commitments since 2020. It has also been done to help the OSCE develop recommendations with consideration to emerging opportunities, trends, and challenges. The survey is designed to complement other data collection initiatives.

Methodology

The 2025/26 survey was disseminated to all 57 OSCE pS. Fifty-five (96 per cent) responded, an increase of six pS compared to the 2021 survey (Table 1). This high participation level reflects the significant commitment of States to their anti-trafficking efforts. The OSCE is grateful to all pS for the considerable time and effort invested in providing detailed and insightful replies to this complex questionnaire. The following analysis does not name individual States; instead, it focuses on significant trends, changes, and gaps across the region.

The survey was also sent to civil society organizations (CSOs) to supplement the data provided by the governments. However, participation from civil society has continuously declined over the last decade, with only 56 CSOs from 28 countries responding in 2026, compared to 84 in 2021 and 90 in 2016. Responses from both pS and non-governmental organizations (NGOs) were collected via Word documents and a dedicated survey website, designed to facilitate the submission process. During the data preprocessing and evaluation phase, both sources were combined. As statistical data regarding trafficking in human beings (THB) victims, investigations, and forms of exploitation were occasionally inconsistent or incomplete, the OSR/CTHB consulted additional publicly available data, such as state annual reports, to ensure internal coherence and comparability with previous survey results. Each section of the analysis includes information from both pS and NGOs where available. As the 2025/26 survey was updated to reflect the evolving nature of the crime, not all questions are directly comparable to previous cycles; such instances are noted within the respective analysis. The data for this survey was collected in 2025 and references throughout the report to 2026 indicates the year the Survey Report was published.

Limitations

The data presented here have clear limitations. They primarily capture what States reported detecting to the OSCE, rather than representing the actual prevalence of human trafficking or the total number of victims across different forms of the crime. Nonetheless, the data provide an important indication of State detection and facilitate the analysis of regional and sub-regional trends to inform evidence-based policymaking and a more nuanced understanding of trafficking patterns. It is also worth noting that since more pS provided data to the survey in 2025 than ever before, some increases in data categories recorded here may be attributed to more States reporting rather than increased prevalence or regional increases in detection.

Structure and resources

Data is central to understanding the phenomenon of THB and making evidence-based decisions. To ensure the survey results are as practicable as possible, the analysis is divided into three primary sections: (1) prevention of trafficking in human beings, including child trafficking, (2) identification and protection of victims, and (3) investigation and prosecution, with a focus on targeting financial and technology-based crime. For the first time, the results are also presented on an interactive website, which features downloadable graphics and adopts a structure corresponding to that of the present report. The additional charts as well as the texts of questionnaires for pS and NGOs, referred to throughout the report, are also available there.

Readers are encouraged to utilise this supplementary resource in their work.

https://arcg.is/eSPrj0

**Survey respondents:
Governments and NGOs**

Responding Government	Responding NGOs		
	2016	2021	2026
Albania	4	5	3
Andorra (since 2021)	0	1	0
Armenia	2	1	2
Austria	3	3	2
Azerbaijan	1	1	1
Belarus	4	1	0
Belgium	2	0	0
Bosnia and Herzegovina	4	2	1
Bulgaria	1	0	0
Canada	1	0	1
Croatia	1	1	0
Cyprus	1	3	1
Czechia	1	0	0
Denmark	2	1	1
Estonia	1	0	0
Finland	1	2	0
France	2	1	3
Georgia	1	0	0
Germany	1	1	3
Greece	2	3	6
Hungary	2	1	0
Iceland	2	2	3
Ireland	3	2	2
Italy	6	4	3
Kazakhstan	5	3	1
Kyrgyzstan (2016 and 2026 only)	1	3	1
Latvia	1	1	0
Liechtenstein (2016 and 2026 only)	0	0	0

Responding Government	Responding NGOs		
	2016	2021	2026
Lithuania	1	0	0
Luxembourg (since 2021)	0	3	1
Malta	0	1	0
Moldova	1	1	2
Monaco	0	0	0
Mongolia (since 2021)	0	1	0
Montenegro	0	0	0
Netherlands	1	2	3
North Macedonia	1	1	0
Norway	0	0	2
Poland	0	0	0
Portugal	2	1	1
Romania	0	3	0
Russian Federation (2016 and 2026 only)	2	4	1
San Marino (2016 only)	0	0	0
Serbia	1	1	2
Slovakia	0	1	0
Slovenia	1	0	0
Spain	3	1	1
Sweden	0	2	0
Switzerland	1	0	1
Tajikistan	5	1	0
Türkiye	1	2	0
Turkmenistan (since 2026)	0	0	0
Ukraine	6	5	1
United Kingdom	3	4	2
United States (2016 and 2026 only)	4	7	5
Uzbekistan (2016 and 2026 only)	2	1	0

Total Governments			Total NGOs		
2016	2021	2026	2016	2021	2026
52	49	55	90	84	56

High-level overview

Number of victims and identification channels

The 2025/26 Survey Report shows a substantial rise in the number of presumed and formally identified victims across the region, based on data from 18,277 cases where the circumstances of identification were documented. Identification pathways have become more diverse, indicating a shift away from law enforcement-led approaches towards multi-disciplinary strategies that reach victims who might otherwise avoid contact with authorities. While police accounted for 71 per cent (9,556 cases) in the 2021 Survey Report, the most recent figures reported by pS show that NGOs and the police are almost on par, with NGOs identifying approximately 35 per cent (6,457 cases) and law enforcement identifying 38 per cent (6,955 cases). Particularly noteworthy is the surge in identification through social services, which increased by 215 per cent, rising from 595 cases (four per cent) to 1,876 cases (ten per cent). This development reflects the growing recognition of the 'social path' to victim identification and underscores the value of multi-stakeholder approaches.

A cornerstone that enables these trends is that 98 per cent of pS have established provisions for 'presumed victims,' so individuals receive immediate assistance such as medical care and emergency accommodation before a formal legal determination. Although the authority to grant formal victim status required for residence permits and further victim rights remains predominantly with law enforcement, a pioneering group of ten pS has already expanded this power to approved NGOs (an increase by six pS compared to the 2021 Survey Report). However, these shifts may also reflect broader challenges. The increase in victims seeking help independently, with walk-ins and self-identification rising from 289 to 882 cases (five per cent), alongside the growing role of NGOs relative to law enforcement, may suggest that victims are increasingly reluctant to approach police due to tightened migration policies.

Trends in prosecution and conviction

Analysis of judicial figures from the 2025/26 survey reveals a sharp upward trend in investigations. These increased from 5,087 cases in 2018, peaking at 12,397 cases in 2022, before stabilizing at a high level of 11,862 cases in 2024. To secure penalties, pS reported increasingly utilizing a multi-charge strategy, relying on non-trafficking statutes when the evidentiary threshold for THB was difficult to meet. Convictions relating to sexual exploitation in travel and tourism surged from only ten cases reported in the 2021 Survey Report to a total of 413 cases in the current reporting period. Investigations in this sector showed an even steeper rise and reached an unprecedented total of 2,314 cases reported by pS. Even when accounting for the concentration of numbers in specific jurisdictions, the broader regional trend is profound. Across the remaining States, investigations surged from just three cases in the 2021 Survey Report to 1,021 in 2026. Another significant trend emerged regarding trafficking for forced criminality: while convictions decreased from 17 cases (65 per cent of total convictions in that year) to 11 cases (five per cent), the number of cases under investigation surged from nine in the 2021 Report to a total of 192. This increase in investigative activity demonstrates that pS are now identifying this form of exploitation much more proactively than before, even as these complex cases continue to move through the judicial system. Convictions for emerging forms of exploitation, particularly in the digital environment, also showed significant increases. Data highlights a sharp increase in convictions for pornography and live web/remote sexual abuse, including those involving children, rising from 23 cases in 2021 to 252 cases, with 1,665 cases under investigation in this category. This suggests that judicial systems are adapting to the technological evolution of trafficking networks. However, this positive trend contrasts with the near-stagnation of training within the judicial sector, with only ten pS reporting training for judges and 18 pS for prosecutors regarding technology-facilitated trafficking.

Information on emerging THB forms

Trafficking form	Status	2016	2021	2026	Total
Adoption for labour/sexual exploitation	Convictions	1	0	0	1
	Under investigation	2	2	0	4
Adoption for labour/sexual exploitation subtotal		**3**	**2**	**0**	**5**
Child marriage	Convictions		4	5	9
	Under investigation		5	38	43
Child marriage subtotal			**9**	**43**	**52**
Benefit fraud	Convictions	5	2	0	7
	Under investigation	2	1	2	5
Benefit fraud subtotal		**7**	**3**	**2**	**12**
Forced begging	Convictions	10	16	21	47
	Under investigation	8	12	267	287
Forced begging subtotal		**18**	**28**	**288**	**334**
Forced criminality	Convictions	12	17	11	40
	Under investigation	10	9	192	211
Forced criminality subtotal		**22**	**26**	**203**	**251**
Forced marriage for labour/sexual exploitation	Convictions	9	7	1	17
	Under investigation	7	12	47	66
Forced marriage for labour/sexual exploitation subtotal		**16**	**19**	**48**	**83**
Organ, human tissue, cell removal	Convictions	2	5	0	7
	Under investigation	3	1	39	43
Organ, human tissue, cell removal subtotal		**5**	**6**	**39**	**50**
Orphanage trafficking	Convictions			0	0
	Under investigation			0	0
Orphanage trafficking subtotal				**0**	**0**
People with disabilities targeted by traffickers	Convictions		10	11	21
	Under investigation		3	54	57
People with disabilities targeted by traffickers subtotal			**13**	**65**	**78**
Pornography/live web sexual abuse	Convictions		14	252	266
	Under investigation		9	1665	1674
Pornography/live web sexual abuse subtotal			**23**	**1917**	**1940**
Recruiting children as armed forces	Convictions	0	1	0	1
	Under investigation	0	0	0	0
Recruiting children as armed forces subtotal		**0**	**1**	**0**	**1**
Recruiting foreign fighters	Convictions	1	1	0	2
	Under investigation	0	2	0	2
Recruiting foreign fighters subtotal		**1**	**3**	**0**	**4**
Sexual exploitation in relation to sex tourism	Convictions	9	7	413	429
	Under investigation	4	3	2314	2321
Sexual exploitation in relation to sex tourism subtotal		**13**	**10**	**2727**	**2750**
Sham marriage	Convictions	3	9	4	16
	Under investigation	7	8	12	27
Sham marriage subtotal		**10**	**17**	**16**	**43**
Trafficking for surrogacy/selling new-borns	Convictions		2	0	2
	Under investigation		1	61	62
Trafficking for surrogacy/selling new-borns subtotal			**3**	**61**	**64**
Total		**95**	**163**	**5409**	**5667**

New policies and the integration of survivor voices

The 2025/26 survey results show a milestone regarding the formalization of responsibility across both the public and the private sectors. Data shows that the number of pS with binding human rights due diligence laws has nearly tripled since 2015/16, rising from ten to 29. This transition from voluntary codes towards mandatory compliance is also evident in the digital environment, where the number of pS making internet service providers criminally or financially liable for knowingly facilitating trafficking has more than doubled in the last five years to 18, although this growth is slow compared to the explosion of trafficking crimes that rely on these platforms. In terms of state accountability, protection measures have been institutionalized through the doubling of pS with provisions on child trafficking within National Referral Mechanisms (NRMs) over the last ten years, reaching 39. However, the 2025/26 survey findings also suggest that States have deprioritized operational responses to child trafficking, such as the use of best-interests guidance (-11 pS) and the appointment of legal guardians for unaccompanied children (-7 pS).

It is positive to note an increase in the number of pS with active survivor feedback mechanisms, rising from 12 in 2021 (24 per cent) to 34 (69 per cent). Thirty-three States (67 per cent) reported using feedback from lived experience experts to draft national anti-trafficking strategies or to improve shelter conditions. The transition of survivor-centred governance from a niche practice to a mainstream requirement suggests an important shift towards more inclusive and evidence-based policy frameworks in the OSCE region. However, very few pS have formal mechanisms to integrate lived experience expertise, such as a national survivor advisory council, and a discrepancy remains, as 52 per cent of responding NGOs (11 out of 21) suggested that victim feedback is still not being used effectively for prevention purposes.

Development in exploitation forms and victim demographics

Labour exploitation remains the most common form of human trafficking, accounting for 32 per cent (9,389 cases) of the total reported cases. This is largely driven by major investigations into high-risk sectors like beverage logistics and meat processing in several pS. Sexual exploitation is the second most commonly reported form, accounting for 21 per cent (6,128 cases). In this context, it is also noteworthy that judicial systems seem to be rapidly adapting to the criminal use of ICTs for sexual exploitation, as shown in a sharp rise of convictions for pornography and live remote abuse. Forced criminality accounted for 17 per cent (4,924 cases) of cases, while domestic servitude remained a smaller but growing category in a previously less visible sector, peaking in 2024 at four per cent (1,026 cases). The number of cases in the THB category relating to surrogacy and the sale of newborn babies, which were previously almost unknown, rose from one investigation in 2021 to 61 in 2026. This indicates a new trend, as well as increased State attention to an emerging form of exploitation. Emerging patterns identified in NGO reports included 19 unconfirmed cases each of child marriage, forced marriage, and orphanage child trafficking. Demographic data reveal ongoing inequalities in access to support. Adult females continue to be the primary beneficiaries of services, while States reported that foreign male children faced the greatest barriers. National male children received support at rates nearly five times higher than foreign boys. Additionally, NGOs noted that only one in 20 beds in specialized shelters was available for boys who were victims of trafficking. Furthermore, regional trends were heavily influenced by the war in Ukraine. The identification of Ukrainian victims peaked in 2022 at 997 cases and primarily involved labour exploitation.

Prevention of trafficking in human beings

Section 1 examines the prevention of THB by addressing the structural vulnerabilities and market-driven factors that enable exploitation. Sub-section A focuses on systematizing State oversight of labour recruitment and the implementation of mandatory due diligence within public and private supply chains. Sub-section B addresses the institutionalization of child protection frameworks, reviewing measures to identify and respond to the specific risks and emerging patterns regarding child trafficking and exploitation online and offline. Sub-section C explores general and targeted prevention efforts, including professionalized training and legislative measures aimed at reducing demand for sexual exploitation through co-ordinated public awareness campaigns. Together, these components highlight a shift towards more protection-centred governance models across pS aimed at disrupting the criminal business of trafficking, although progress remained hampered by a persistent implementation gap between legislative advancement and practical enforcement.

SECTION 1

A Identifying and addressing trafficking for labour exploitation

Analysis of results summary

In the realm of identifying and addressing trafficking for labour exploitation, the analysis shows a fundamental shift from self-regulation to strengthened state oversight. Licensing requirements have nearly doubled since 2016, and 59 per cent of responding States have now prohibited worker-paid recruitment fees to combat debt bondage. Transparency has improved through mandatory written contracts in understandable languages and increased worker mobility, such as the right to change employers without requiring a new visa, which reduces the power asymmetry inherent in many employment relationships and facilitates victims leaving exploitative work situations. However, data indicates that progress has slowed since 2021 regarding tackling the withholding of travel documents, and nearly half of the pS still lack binding human rights due diligence laws for companies.

A1: Regulations for labour recruitment and placement agencies – foreign nationals 2016-2026

The data show a clear expansion of regulatory frameworks for more comprehensive protection of migrant workers between 2016, 2021, and 2026 across pS, with the most notable growth after 2021. Licensing requirements and, to a similar extent, business registration requirements increased steadily (2026: 36 pS, 2021: 26 pS, 2016: 19 pS), which reflects a broader formalization of recruitment markets and stronger state oversight. One of the most significant changes since 2021 is the requirement to provide written contracts in a language that the

workers understand. Ten years ago, this was largely unregulated in many contexts; by 2026, 28 pS have introduced such requirements (+12). In addition, the prohibition of worker-paid recruitment fees has doubled since the first survey in 2015/16 to currently 32 countries, although growth since the 2020/21 survey has been slow (+3). This slowdown might indicate implementation challenges. A growing formalization of recruitment relationships through requirements for written contracts and agreements (2026: 26 pS; 2021: 19 pS) is a positive de-

Regulations for labour recruitment and placement agencies – foreign nationals 2016-2026
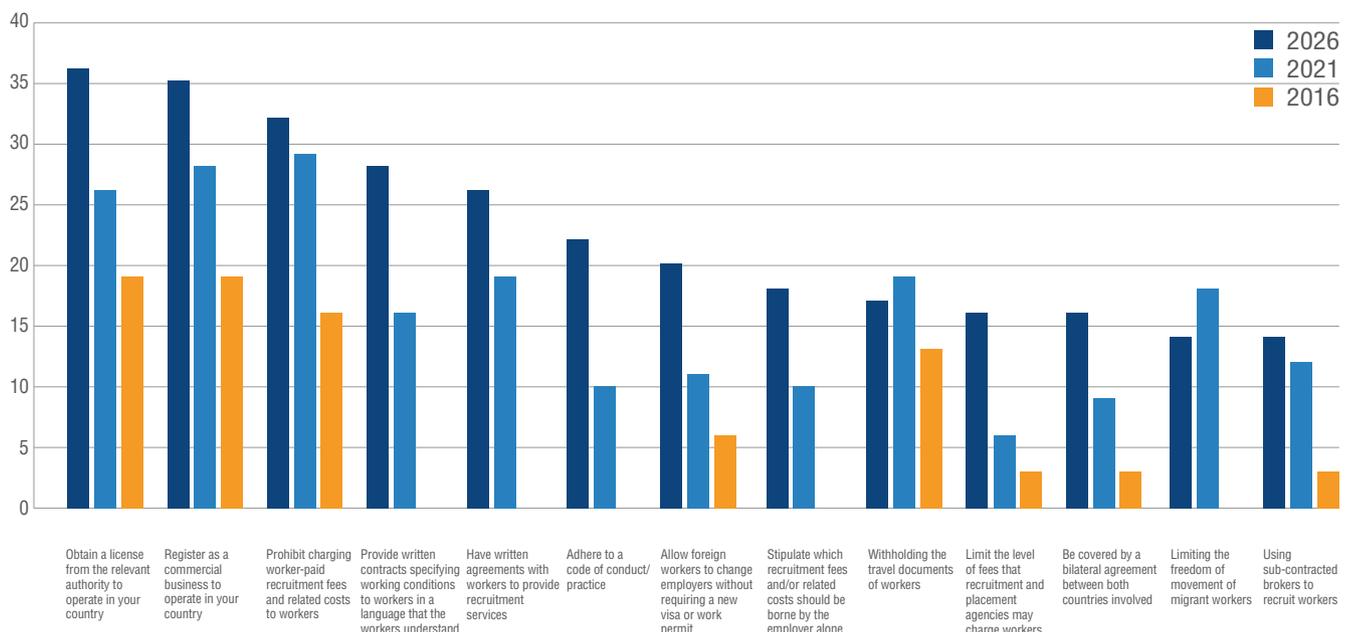
velopment and suggests increasing alignment with ILO recruitment standards and the OSCE model guidelines on government measures to prevent trafficking for labour exploitation in supply chains.[1] The sharp increase in codes of conduct (+12) and employer-borne recruitment costs (+8) since 2021 points to a shift toward corporate accountability, self-regulation, and sector-wide standard-setting. Sixteen pS limit the level of fees that recruitment and placement agencies may charge workers, which can be seen as a pragmatic compromise for countries that do not fully prohibit fees but seek to curb exploitation. Important progress is also visible in allowing workers to change employers without a new visa (2021: 11 pS, 2016: 6 pS), with 20 countries now having such regulations in place. Some of the few negative developments since 2021 are a decline of countries regarding measures addressing the withholding of workers' travel documents to currently 17 pS (-2), and a decrease to 14 in the number of countries that prohibit restrictions on the freedom of movement of migrant workers (-4). It is unclear whether this reflects legal reforms removing such provisions, or issues related to the survey questionnaire completion or data transmission. The modest growth in bilateral agreements in the last five years (16 pS, +7) and the continued use of subcontracted brokers (+2) suggest that cross-border governance remains uneven and politically complex. At the same time, two countries reported having no related legislation, regulations or policies, while another country is in the process of developing such a regulatory framework. This overall expansion of regulation indicates a move toward standardized protections, though the decline in freedom of movement and identity document protections remains a concern.

Additional qualitative information from ten countries shows a range of regulatory approaches to recruitment and employment. These include general principles of equal treatment, human and labour rights, non-discrimination, ethical conduct, and data protection, as well as specific sectoral or administrative requirements such as tax registration and migration compliance. In several countries, recruitment activities are restricted to legally residing workers or subject to formal licensing and access rules for employment agencies. Its enforcement may fall under different competent authorities depending on the issue. Several countries mentioned gaps in procedures and fragmented competencies that limited their ability to provide complete responses. The diversity of approaches underscores the complexity of harmonizing recruitment standards across different national jurisdictions.

A1: Allow foreign workers to change employers without requiring a new visa or work permit

Being tied to a single employer increases the vulnerability of migrant workers to forced labour and makes it harder for trafficking victims to leave exploitative situations.[2] While 20 of the 54 responding countries grant the right to change employers without requiring a new visa within their regulatory framework (2021: 11 pS; 2016: 6 pS), thus reducing the power asymmetry between employer and employee, migrant workers in 48 per cent of pS do not have this option. In four countries, such measures are currently under development, while three pS provided no information regarding this specific sub-question. Restricting employer mobility remains a significant structural vulnerability that pS are only gradually beginning to address.

Allow foreign workers to change employers without requiring a new visa or work permit

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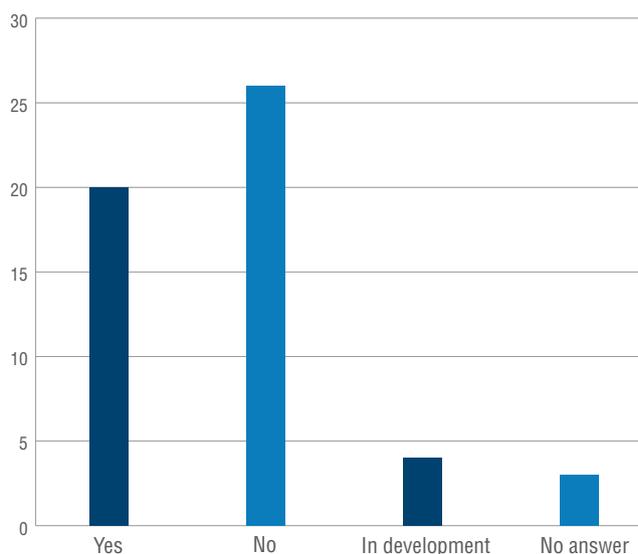
1   OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, Model Guidelines on Government Measures to Prevent Trafficking for Labour Exploitation in Supply Chains (Vienna, February 2018), p.40 ff.
2   ILO indicators of forced labour, 2025 revised edition, p. 7.

A1: Regulations for labour recruitment and placement agencies - nationals working abroad 2016-2026

Data regarding regulations for nationals working abroad show a clear regulatory surge, with a robust increase since 2021. The licensing requirement rose significantly from 19 in 2016 to 35 in 2026, with a strong increase of 12 countries since 2021. This indicates strengthened state control over overseas recruitment. Parallel to this, registration as a commercial business has developed from 19 pS in 2016 to now 34 pS, which points to a further formalization of the sector. Particularly noteworthy is the prohibition of worker-paid fees, which increased from 13 pS in the 2015/16 Survey Report to 30 pS (+7 since 2021). The stipulation of which recruitment fees should be borne by the employer also grew to 16 countries (+6 since 2021/2016). Both measures aim to prevent financial exploitation that contributes to debt bondage and enhances vulnerability to THB. The requirement for written contracts in an understandable language rose to 27 pS (+7 since 2021) and can be understood as a signal towards improved transparency across the OSCE region. The rapid increase in licensing and fee prohibitions for nationals suggests that States are increasingly prioritizing the protection of their own citizens abroad.

The most remarkable improvements can be seen in codes of conduct (+13 pS since 2021), with such requirements in place in 22 pS, and pre-departure orientation training (+12 to 19 pS) that prepares workers for risks and rights abroad. Both questions were only introduced in the 2021 Survey Report and can be understood as preventive protective measures for migrant workers. The regulation of sub-contractors nearly quadrupled compared to 2016, moving from four to 16 pS now; however, it has risen only hesitantly since the 2021 Survey Report (+3). This might suggest insufficient efforts to close accountability gaps in recruitment chains. Recruitment fee limitations doubled to 14 countries (+8 since 2021/2016), while the number of countries with bilateral agreements grew moderately to 15 (+6 since 2021/2016). The smallest change was reported in prohibitions of withholding travel documents for workers, where only one country introduced such regulations compared to the 2021 Survey Report (+10 since 2016).

Regulations for labour recruitment and placement agencies – nationals working abroad 2016-2026
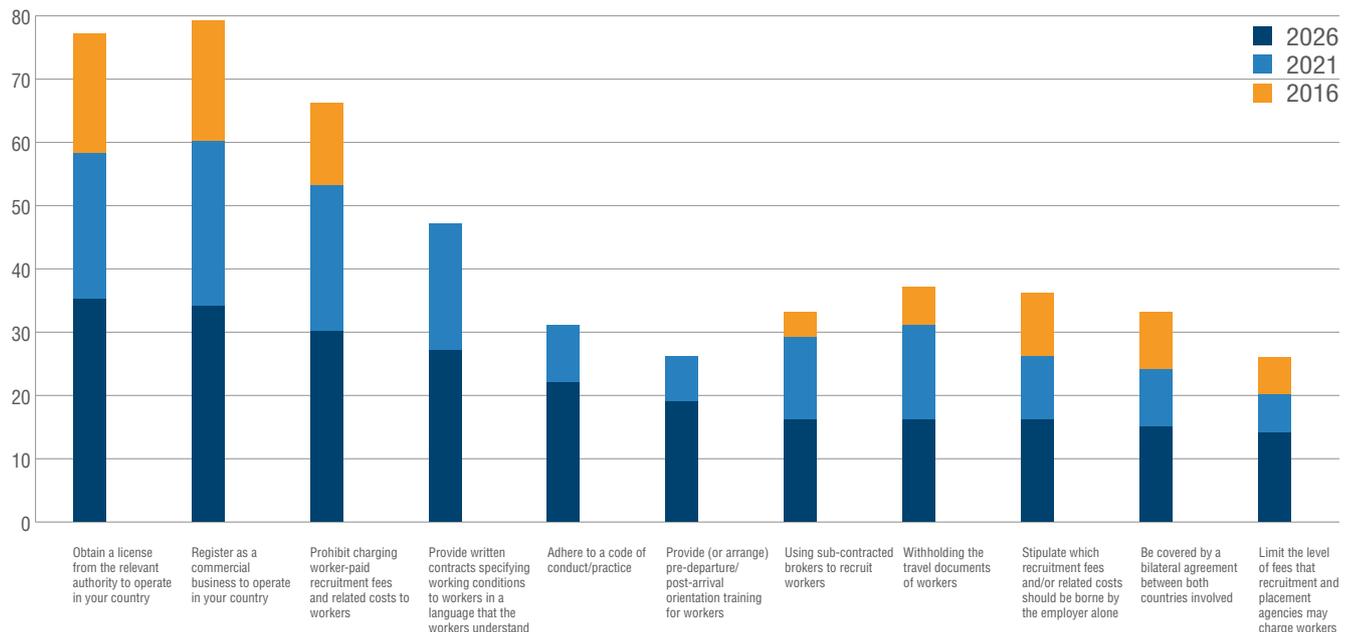
A1: Prohibition for recruitment and placement agencies or individuals providing such services

According to the ILO, restrictions on freedom of movement and retention of documents with the aim to control job seekers are two types of abusive and fraudulent recruitment practices that can amount to the crime of trafficking in persons if the end result of the recruitment process is exploitation.[3] Foreign and national workers are protected almost equally by law from restrictions on their freedom of movement as well as from retention of travel documents. There is a slight discrepancy when it comes to the use of subcontracted brokers, with more prohibitions on the placement of citizens (16 pS) by subcontractors than on foreigners (14 pS). Thirty-two to 36 pS have no explicit prohibitions of the above-mentioned regulations, meaning that only between 31 and 24 per cent of the 54 responding countries have corresponding measures in place. The low percentage of States with explicit prohibitions against movement restrictions highlights an urgent need for regulatory alignment with OSCE standards.[4]

Prohibition for recruitment and placement agencies or individuals providing such services

A1: Regulation of recruitment fees

Regulation of recruitment fees for both migrant workers (foreigners) and nationals has increased over the past five years, with protection standards for migrant workers generally being slightly more pronounced. The prohibition of worker-paid recruitment fees is particularly widespread and can be considered a key instrument for protecting workers from debt bondage. Fifty-nine per cent of the 54 responding countries have now introduced such a ban, which is double the number in 2016. However, since the 2021 Survey Report, only three pS have newly introduced such measures. Measures to limit recruitment fees and clearly allocate employer-borne costs are less common but also relevant, as they close legal grey areas that can encourage debt. The additional qualitative information from 12 pS showed that employers are required to cover placement fees (e.g. limited to EUR 2,000) and important employment-related costs such as health and safety measures, medical examinations, and wages during trials, as well as travel, accommodation, repatriation, and sometimes housing costs. Furthermore, there are explicit prohibitions on passing these costs on to workers. Overall, the data shows an increasing alignment of national legal frameworks with international standards to prevent debt bondage, although the stagnation since 2021 suggests that the momentum for this specific reform may be slowing.

A1: Requirements for recruitment and placement agencies or individuals providing such services

The comparison between foreign migrant workers and nationals working abroad revealed almost parity in regulatory frameworks. Most requirements showed similar numbers for both categories, with differences of one to four countries. This suggests that OSCE participating States have applied relatively consistent regulatory standards regardless of whether agencies recruit foreigners or send nationals abroad. Regulatory inspections, almost universally applied regardless of worker origin (foreigners +1), were the most widely reported oversight mechanism. It was followed by licensing requirements (35-36 pS) that reflect the growing awareness of the need for state control and quality standards in the recruitment sector, particularly to protect vulnerable migrant workers. However, the reported number of external audit requirements (17 pS) lagged significantly behind licensing. The discrepancy between licensing and external audits indicates that while States are setting entry standards, they struggle to monitor ongoing compliance effectively. Commercial registration has increasingly been established as a minimum requirement for formal labour market structures. The fact that a quickly growing number of countries have been

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3 OSCE: Model Guidelines on Government Measures to Prevent Trafficking for Labour Exploitation in Supply Chains, p. 40 (OSCE, 2018) with reference to: Andrees, Beate, Nasri, Alix and Swiniarski, Peter: Regulating labour recruitment to prevent human trafficking and to foster safe migration: Models, challenges and opportunities, ILO Working Paper, (ILO, 2015): https://cthb.osce.org/sites/default/files/f/documents/1/9/371771.pdf.

4 OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings and OSCE Department of Management and Finance Combating Trafficking in Human Beings and Labour Exploitation in Supply Chains Guidance for OSCE Procurement (Vienna, 2022).

Regulation of recruitment fees through one or more of the following

Legend:
- Foreigners (dark blue)
- Nationals (light blue)
- In development for foreingers (orange)
- In development for nationals (grey)

Categories:
- Limit the level of fees that recruitment and placement agencies may charge workers
- Prohibit charging worker-paid recruitment fees and related costs to workers
- Stipulate which recruitment fees and/or related costs should be borne by the employer alone

Requirements for recruitment and placement agencies or individuals providing such services

Categories:
- Be open for inspections by regulatory authority
- Obtain a license from the relevant authority to operate in your country
- Register as a commercial business to operate in your country
- Provide written contracts specifying working conditions to workers in a language that the workers understand
- Have written agreements with workers to provide recruitment services
- Be open for checks by anti-trafficking police units
- Regularly report on numbers of workers posted and returned
- Adhere to a code of conduct/ practice
- Provide or arrange pre-departure/ post-arrival orientation training for workers
- Be subject to external audits
- Be covered by a bilateral agreement between both countries involved
- Regularly report on CTHB activities

introducing mandatory written employment contracts in a language the worker understands shows an increased focus on transparency and informed consent. This may be a response to documented cases of exploitation where workers did not understand the terms of their contracts and suggests universal recognition that formalized worker-agency relationships are essential regardless of the direction of migration. Anti-trafficking police checks were marginally higher for foreigners (+2), which could in-

dicate heightened concern about trafficking risks among migrant workers. Reporting on workers posted/returned was slightly higher for foreigners than for nationals, which may reflect an administrative interest in tracking migrant worker presence for immigration control purposes, while the return of nationals is less administratively sensitive. The least common measure in only nine pS was reporting on counter-trafficking in human beings, however, when it exists, it is equally applied to foreigners and nationals.

A2: Monitor and compliance measures in place on recruitment and placement agencies 2016-2026

Fifty-two countries (96 per cent) provided information on the processes in place for monitoring or ensuring compliance with laws and regulations on recruitment and placement agencies (up from 40 in 2021/34 in 2016). Labour Inspection Agencies (40 pS) and State Agencies related to Labour and Social Affairs (24 pS) were most frequently mentioned as the competent authorities (see chart A2 – Monitor and compliance measures in place on recruitment and placement agencies – in the Download Centre). One pS reported having no such measures in place, and one country did not respond to this question.

Qualitative submissions from pS indicated continued progress in strengthening their compliance frameworks through institutional and legal mechanisms. Monitoring and enforcement responsibilities were primarily vested in labour inspectorates, migration authorities, anti-fraud units, and specialized agencies, which conducted regular inspections of recruitment agencies to verify adherence to licensing conditions, employment standards, and worker protection requirements. Several countries have enacted comprehensive legislative reforms to expand oversight powers, introduce mandatory notification systems for agency activities, and establish specialized task forces or inter-agency co-operation among labour, migration, and law enforcement authorities, and also strengthened capacity-building efforts. Some pS have implemented sector-specific inspection protocols targeting high-risk industries such as agriculture, construction, domestic work, hospitality, and manufacturing. Overall, reported measures demonstrated a shift towards more preventive and co-ordinated approaches, as also illustrated in the previous charts.

Monitor and compliance measures in place on recruitment and placement agencies
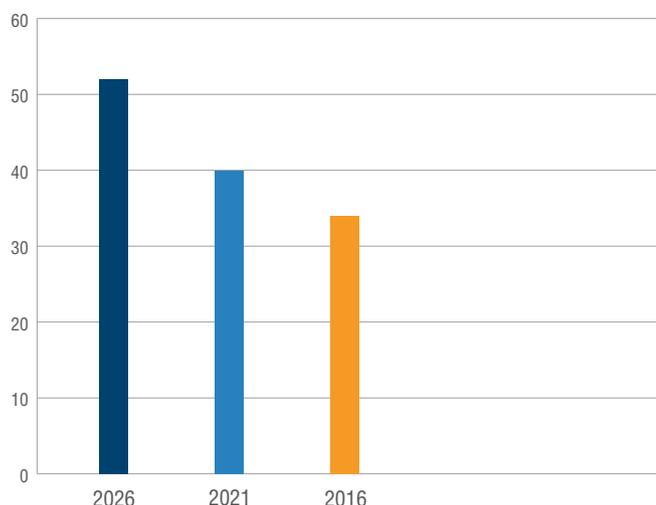
A3: Penalties for non-compliance

Fifty-one countries reported imposing penalties for non-compliance with laws and regulations regarding recruitment and placement agencies. States addressed violations through a combination of criminal, administrative, and regulatory measures. Financial penalties imposed on agencies or individuals providing such services, or against the management of the agency, and license revocation were the most commonly named sanctions, collectively accounting for 59 per cent of all reported sanctions. Serious violations could also result in criminal prosecution, including imprisonment (16 pS). Administrative authorities were able to impose fines and corrective sanctions independently of criminal proceedings. Enforcement frameworks additionally permitted suspension or prohibition of activities and exclusion from public procurement for non-compliant operators. Labour inspectorates and occupational safety authorities played a central role in investigations, enforcement, and referral to law enforcement where appropriate. The heavy reliance on financial penalties and licensing suggests that States prioritize economic deterrents to regulate recruitment behaviour and relatively few pursue criminal sanctions, including imprisonment. The low number of pS that publicize violations or penalties makes it harder for workers to avoid those agencies that have engaged in illegal activity that may contribute to human trafficking.

Penalties for non-compliance

- Financial penalties against the agency or individuals providing such service
- Revocation of license
- Financial penalties against the management of the agency
- Withholding the right to work in the field for a certain period of time
- Imprisonment
- Other
- Public notification of violations/penalties
- Confiscation of proceeds
- No answer

A5: Public procurement policies to minimize the risk of purchasing products or services produced through forced labour 2016-2026

As illustrated in the chart, compared with data reported in the previous two surveys, there were significant increases in public procurement policies to minimize the risk of purchasing products or services produced with forced labour. Blacklist review mechanisms have more than doubled since 2021 (18 pS). Governments also commonly relied on suppliers providing access to external audits, self-certification, followed by access to factory names and addresses. Supplier codes of conduct showed only a small increase (+2 since 2021), which could imply that this voluntary measure had proven to be of limited effectiveness over time. The move away from voluntary codes toward blacklist mechanisms indicates a shift toward more enforceable procurement standards.

Public procurement policies to minimize the risk of purchasing products or services produced through forced labour 2016-2026
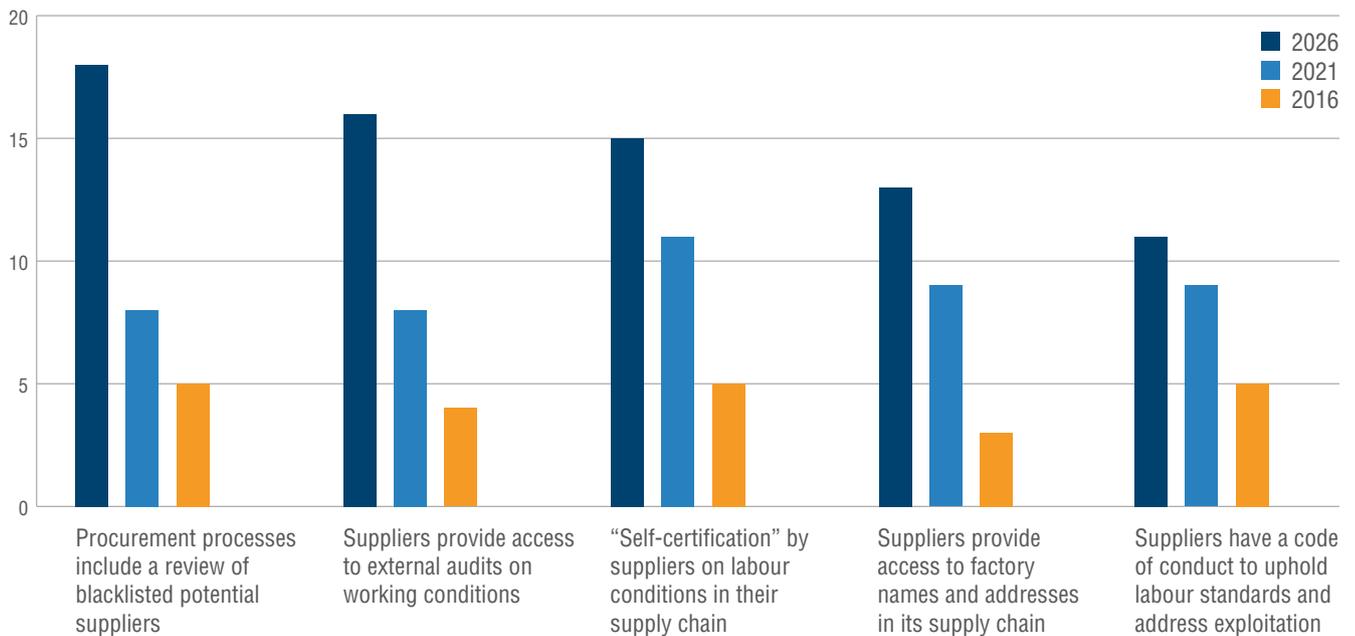
A5: Public procurement policies to minimize the risk of purchasing products or services produced through forced labour

Two new questions were added in 2026: whether suppliers must have employment contracts with all workers, which was reported as the most common measure by countries, and whether States have a prohibition of worker-paid recruitment fees, which was the third most common response. As other measures, pS increasingly reported public procurement exclusions as an enforcement tool against labour exploitation. Contractors convicted of human trafficking, forced labour, child labour, or related offences were barred from bidding on or receiving public contracts in at least six States. Some countries mandated automatic exclusion, while others granted contracting authorities' discretionary powers. Legal frameworks in pS required criminal record checks or statutory declarations during tender processes. Several countries incorporated anti-forced labour clauses in supply chains to allow contract cancellation when exploitation was detected. However, even by 2026, fewer than 20 pS have implemented such measures. Ten countries reported not having any of the above-mentioned or other relevant policies to prevent complicity in labour exploitation, and 11 pS did not respond. Overall, while new policy tools are emerging, their limited adoption across the OSCE region shows that procurement remains an underutilized lever in the fight against trafficking.

Public procurement policies to minimize the risk of purchasing products or services produced through forced labour
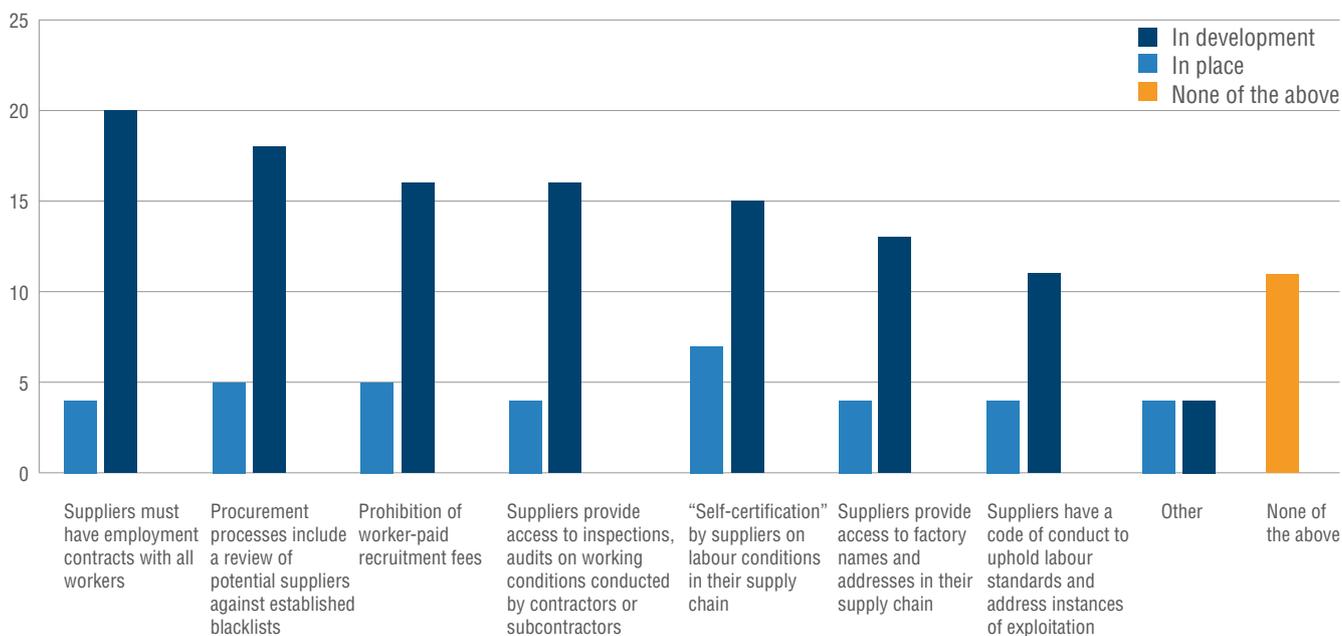
A6: Public organizations responsible for monitoring adherence to public procurement policies

Forty-two pS responded to this question. Public Procurement Agencies were most frequently mentioned (23 pS); however, many pS reported that such obligations were shared among multiple competent authorities rather than being assigned to a single institution, depending on the nature of the compliance issue. In several countries, contracting authorities themselves were responsible for verifying compliance, mainly through self-declaration mechanisms, compliance certificates, and exclusion checks during procurement procedures. Other pS reported no specific legal designation of a competent authority for monitoring compliance with human trafficking or exploited labour requirements in supply chains, instead relying on general regulatory or enforcement frameworks. One country reported having no dedicated control mechanism, noting that public procurement policies constitute an obligation and therefore no specific authority was designated to oversee compliance. The lack of a centralized monitoring authority in many pS may hinder the consistent enforcement of anti-trafficking procurement rules.

A7/8: Implementation of public procurement policies

Of the 46 countries that provided information, 28 have produced a public report on the implementation of public procurement policies, while 18 have not. The reporting periods varied across countries, ranging from quarterly publications to reporting cycles covering up to five years. The responses of 40 pS showed that training is the most frequently reported measure to ensure the implementation of public procurement policies (29 pS), followed by awareness-raising activities and complaints and dispute mechanisms (22 pS). One country indicated that no specific regulation is in place, relying instead on case-by-case practices. Seventeen countries referred to other measures, such as inspections or practical support and guidance for contracting authorities throughout the procurement and contract management process. Training and awareness-raising measures were most reported to take place on an annual or ongoing basis, while complaints and dispute committees also happened on an ad-hoc basis. The prevalence of training over formal reporting suggests that States are focusing more on building capacity than on public accountability.

Public organizations responsible for monitoring adherence to public procurement policies
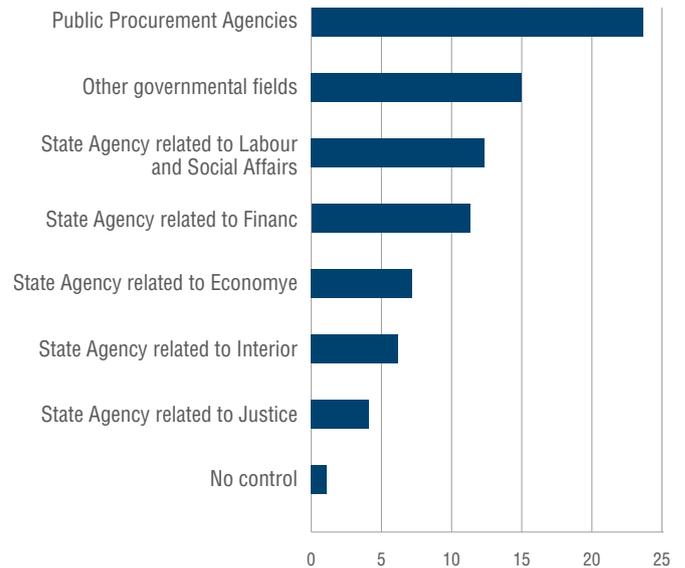
States with public reports on the implementation of public procurement policies
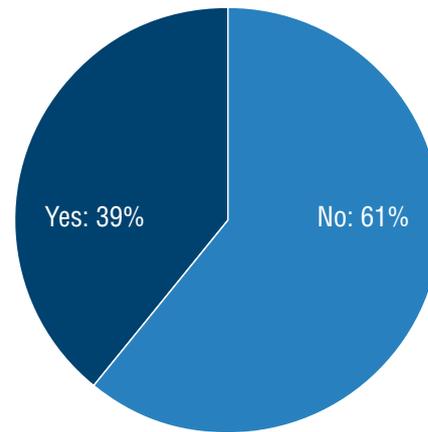
Ways to ensure that public procurement policies are implemented
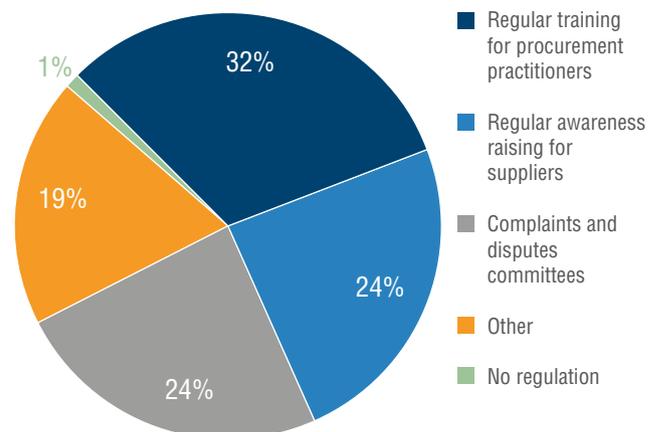
A9: Countries with legislation or regulation on human rights due diligence obligations for companies

Out of 49 countries, 20 reported that they did not have legislation or regulation regarding human rights due diligence obligations for companies; five countries did not reply. The responses of the 29 pS that had such legislation or regulation in place showed a clear movement towards stronger regulation of corporate responsibility. While some countries emphasized that their entire legal systems were based on constitutionally enshrined human rights as the foundation for enforcing labour standards within their jurisdictions, others relied on specific legislation on due diligence. Overall, a clear global shift occurred from voluntary adherence to international guidelines, such as the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights, towards binding national legislation.

Countries with legislation or regulation on human rights due diligence obligations for companies
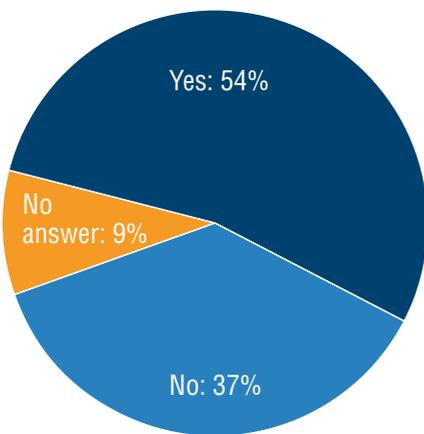
A9: Legislation or regulation on human rights due diligence obligations for companies 2016-2026

The pace of legislative activity accelerated significantly from 2021 onwards. Between 2016 and 2026, the number of pS with human rights due diligence legislation or regulation in place nearly tripled, rising from ten to 29. After 2021, 13 additional countries adopted such measures in just five years. At least five major legislative acts were adopted or entered into force across North America, Northern Europe, and at the EU level, specifically targeting transparency and accountability in supply chains. The adoption of the EU Corporate Sustainability Due Diligence Directive 2024/1760 in July 2024 served as the primary catalyst for this regulatory surge, prompting several pS to begin transposing these requirements into national law. The focus of these new legal frameworks is on eradicating forced and child labour. Companies were required to move beyond passive compliance towards proactive risk identification and mitigation across their entire value chains. This development was accompanied by increased institutional oversight; pS reported having established National Contact Points and specialized enforcement bodies tasked with monitoring corporate compliance and handling related grievances. Despite this momentum, a significant implementation gap remains. Almost half of all responding pS (49 per cent) did not have relevant legislative or regulatory measures in place regarding human rights due diligence.

Legislation or regulation on human rights due diligence obligations for companies
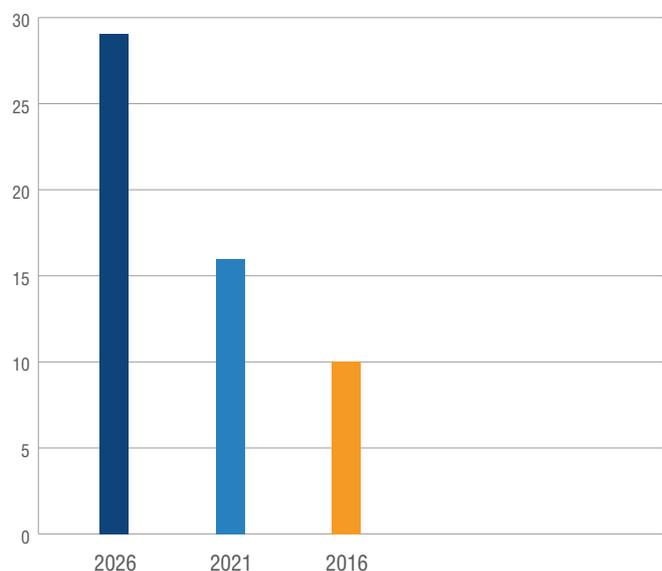
A10: Legislation, regulations or other policies addressing trafficking in human beings or forced labour in supply chains that require companies to do any of the following:

Forty pS responded to the request to describe any legislation, regulations or other policies addressing human trafficking or forced labour in supply chains, 12 of which replied that they did not know whether such requirements existed. Public reporting on efforts to address labour exploitation in supply chains was relatively common (13 pS), alongside the existence of established policies and procedures to prevent and address trafficking in human beings and training for key staff, particularly those involved in procurement (9 pS). Monitoring of the implementation of policies and procedures occurred less frequently, while licensing of internal policies and international monitoring mechanisms, and the inclusion of contractual clauses prohibiting exploited labour were reported only by five pS. A comparatively high number of countries (13 pS) referred to other measures without further specification.

Legislation, regulations or other policies addressing trafficking in human beings or forced labour in supply chains that require companies to do any of the following:

A12: Monitoring and enforcement laws prohibiting the use of forced labour in supply chains

Thirty-three countries provided information on the monitoring and enforcement of laws prohibiting the use of forced labour in supply chains, 14 more than in 2021. A tripling of the numbers in the last ten years shows a positive trend in pS, which is likely due to increased international requirements. At least five pS established specialized National Contact Points as non-judicial grievance mechanisms, which investigated complaints, mediated disputes, and issued statements on cases of non-observance linked to their territories. Complaint procedures were accessible to both workers and economic operators participating in public procurement processes, with decisions subject to administrative or judicial review. States reported collaborative frameworks involving labour inspectorates, police anti-trafficking units, customs

Monitoring and enforcement laws prohibiting the use of forced labour in supply chains
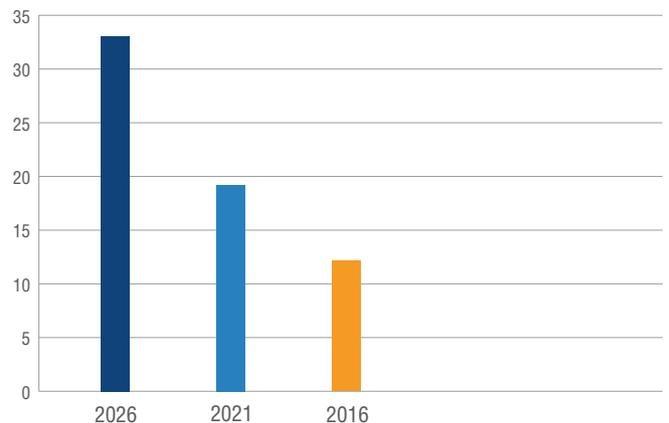
authorities, and tax agencies, some countries also implemented risk-based matrices to identify high-risk sectors. Measures included the exclusion of economic operators from public procurement found guilty of labour legislation violations or human rights offences. Countries furthermore reported having established and conducted specific training programmes for labour inspectors, often in co-operation with international organizations and civil society to enhance detection. The increased use of non-judicial grievance mechanisms and inter-agency frameworks suggests a more diversified approach to enforcing supply chain accountability.

A14: Measures in countries to encourage the private sector to address human trafficking

The scale of measures to encourage the private sector to address human trafficking nearly doubled over the last five years, jumping from 26 pS in 2021 to 49 pS. Additional data provided by 48 pS illustrated a focus on outreach and education measures for private sector encouragement to address human trafficking. Prevention campaigns and awareness programmes were the most prevalent measures (41 pS). This was followed closely by two categories with equal priority: capacity-building and training and the provision of guidelines and online/offline information tools by public organizations (33 pS). This indicates efforts to translate awareness into operational practice. Furthermore, knowledge exchange played a significant role, with 25 pS sharing good practices. Countries reported less frequent collaborative efforts with non-state actors, primarily due to the support of multi-stakeholder initiatives and facilitation of joint authority control and co-operation between different government bodies (22 pS). Several pS reported having other measures, for instance, inspections or the disqualification of economic operators from public procurement if they were found to violate social, labour, or environmental legislation. Sometimes, pS reported on new and creative measures to support businesses, such as a dedicated hub to provide legal and financial consulting on due diligence or online training modules for the hospitality sector. The high volume of awareness-raising activities compared to formal collaborations suggests that States are still in the early stages of building deep privat-sector partnerships.

Measure to encourage the private sector to address human trafficking
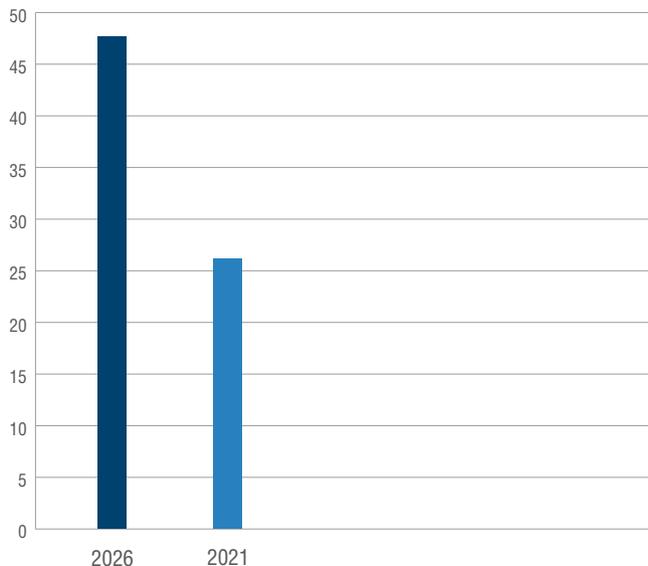
Measures in countries to encourage the private sector to address human trafficking

B Measures to combat child trafficking

Analysis of results summary

Regarding the protection of children from trafficking, findings reveal that institutionalization of protection measures has advanced, with the number of pS with provisions on child trafficking within National Referral Mechanisms (NRMs) more than doubled to 39 pS. Despite this, there is considerable concern over the deprioritization of practical measures. The provision of child-friendly accommodation, specialized police training, and proactive birth registration campaigns declined significantly since 2016. States increasingly prioritized reactive digital strategies, such as content removal and the use of international databases, while preventive measures like mandatory age verification or grooming detection saw limited uptake. Despite improved communication protocols, significant cross-border gaps persist. As reported by pS, 14 respondents are still lacking a National Focal Point for child victims, which hinders a rapid information exchange for protecting children.

B1: Legislation, regulations or other policies to combat child trafficking

Most of the 53 responding States had core legal provisions to combat child trafficking, including aggravated offences for child victims (50 pS) and the inclusion of child trafficking in anti-trafficking legislation (49 pS). A large majority of pS also criminalized engaging in sexual activities with a minor in exchange for money, though this was slightly less consistent when criminalization was independent of the buyer's knowledge of the child's age (44 pS), which indicates a potential loophole. Across pS, national action plans (NAPs) and strategies on trafficking and child protection were widespread (49 pS), regularly updated, and typically combined prevention, identification, victim protection, and prosecution measures, often with child-specific components like professional training and child-friendly procedures. This demonstrated a shift from isolated policies toward more structured and co-ordinated responses. Provisions addressing child trafficking for forced begging (48 pS) also reflected a widespread recognition of trends and emerging patterns in trafficking, as shown in previous OSCE surveys. While more improvement is needed, provisions tasking educational authorities and provisions on child trafficking within

Legislation, regulations or other policies in place to combat child trafficking

■ Yes
■ No

*In accordance with evolving terminology and the 'Terminology Guidelines on the Protection of Children from Sexual Abuse and Exploitation', the original two survey questions regarding the purchase of sex from a minor were adjusted.

Legislation, regulations or other policies in place to combat child trafficking (bar chart):
- Human trafficking crimes committed against a child are qualified as aggravated offenses
- *Engaging in sexual activities with a minor in exchange for money is a criminal offense if the buyer knew the victim was a minor
- Provisions on child trafficking within the comprehensive law on combating trafficking in human beings
- Provisions on child trafficking within the NAP on combating trafficking in human beings
- Trafficking in children for the purpose of forced begging is a criminal offense
- *Engaging in sexual activities with a minor in exchange for money is a criminal offense irrespective of the knowledge of the buyer
- Provisions tasking educational authorities/institutions to implement measures on combating child trafficking
- Specific non-punishment provisions envisaged for child victims of trafficking
- Provisions on child trafficking within the NRM
- Provisions to implement gender-/minority-specific measures on combating child trafficking
- The country is in the process of introducing new legislation, regulations or policies

National Referral Mechanisms (NRMs) showed an uptick (39 pS). It merits positive mention that countries that had formalized or updated their NRMs - often through new or revised action plans, regulations or binding co-operation mechanisms - showed a stronger child-centricity, with dedicated provisions for guardianship, child-appropriate procedures, specialised care, and protective measures aimed at greater operationalisation. Although ten pS still had no specific non-punishment clauses for child victims, the qualitative data indicated a slight shift from implicit or discretionary non-punishment towards more explicit, comprehensive, and child-sensitive frameworks. Overall, the information provided by the pS suggests that basic legislative frameworks are common, but targeted, child-sensitive protection addressing systemic risks, institutional responsibilities, and gender- or minority-specific vulnerabilities remains limited.

B1: Specific provisions on child trafficking within the national referral mechanism 2021-2026

A substantial increase occurred in the number of pS that had provisions on child trafficking within National Referral Mechanisms (NRMs), rising from 16 pS in 2021 to 39 in 2026. This represented more than a doubling of commitment to formalized child victim identification and assistance procedures and suggested a significant strengthening of institutional frameworks. Also, it indicates a broad implementation of the recommendations from the previous survey period. The NRMs were established through legislation, government decisions, or inter-institutional agreements and set out clear procedures for the identification, referral, and assistance of victims of trafficking. While few pS applied child-specific referral pathways and safeguards, and most extended general NRM procedures to minors, pS recognised children as a vulnerable group, and their overall approach emphasised multi-agency co-operation, child-centred assistance, and tailored support measures for (presumed) child victims. However, it cannot go unnoticed that 14 pS had no specific provisions on child trafficking within their NRMs.

Specific provisions on child trafficking within the National Referral Mechanism 2021-2026
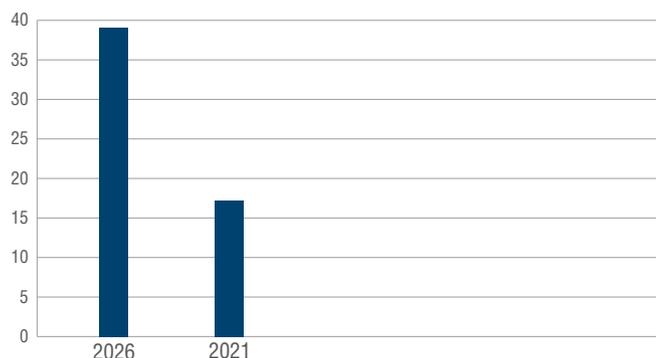
B2: Types of children at risk in child trafficking prevention legislation and policies

Fifty-one pS included at least one category of at-risk children in their prevention legislation and policies, which represented a significant improvement compared to both previous surveys, where around 25 per cent of pS lacked such recognition. Unaccompanied and separated children (36 pS) followed by displaced children (25 pS) remained the most frequently mentioned categories (2021: 27 pS). The third most often mentioned categories were children in institutional care and those with disabilities (24 pS). This suggested growing awareness of the specific vulnerability of such children to trafficking and of the multiplying risks at the intersection of various vulnerabilities, as well as a legislative focus on children already within state systems. The focus on children within state systems often left those on the societal fringes without targeted protection. Care leavers, children without citizenship or birth registration, as well as homeless youth and missing children received comparatively less attention, despite their heightened vulnerability to trafficking. Among the 20 pS that selected 'other,' anti-trafficking and child exploitation laws in general protected all persons under the age of 18, viewing childhood itself as sufficient grounds for vulnerability. Some of these States complemented this generic approach with more detailed recognition of specific risk factors like lack of parental care, migration status, drug addiction or social marginalisation. Two pS did not respond to this question, while two others selected 'Don't know.'

Types of children at risk in child trafficking prevention legislation and policies
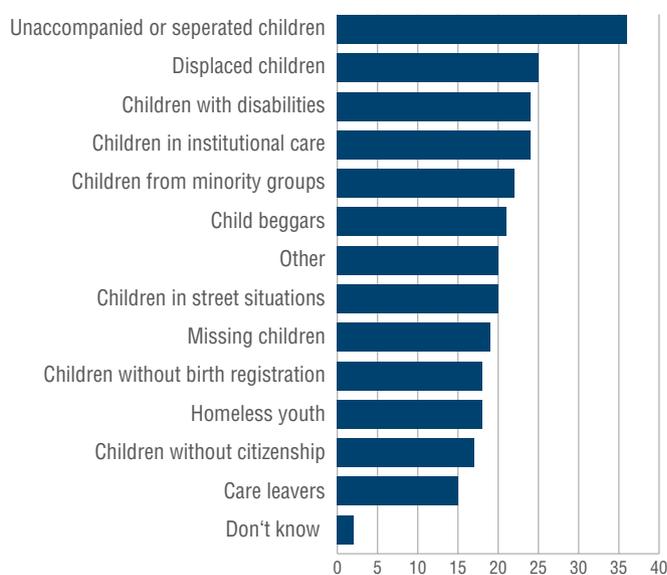
B3a: Measures to prevent, identify, and respond to child trafficking

The data provided by 52 countries revealed in most parts an even and equal implementation of measures against child trafficking. Three measures were excluded from this, all of which showed relatively limited adoption: Registration of convicted child sex offenders as the least frequently mentioned measure (13 pS), proactive birth registration campaigns (15 pS), and extra-territorial legislation for child sexual exploitation (17 pS). Training for police in identifying indicators of child trafficking was reported by 24 pS, whilst a national hotline for reporting child trafficking, exploitation, and sexual abuse was reported by 25 countries. Accommodation provisions for child victims that were distinct and separate from adult victims existed in 26 pS, as did measures ensuring educational access for children of non-nationals. Training for police who may encounter children trafficked for sexual exploitation matched the number of pS that had guidance on incorporating children's best interests in victim assistance measures (28 pS). Measures ensuring access to healthcare for trafficked children, including minority groups and those with disabilities, were present in 27 pS.

Police training on contact with children trafficked or exploited for forced criminality was reported by 28 pS, as was the appointment of legal guardians for all accommodated children and for children presumed to be trafficking victims. Twenty-eight pS reported to ensure access to healthcare for children, including minority groups and those with disabilities. The appointment of legal guardians for children formally designated as trafficking victims was reported by 29 pS. Training for police on crimes involving trafficking and exploitation of children for begging, and targeting nationals exploiting children abroad and collaborating with foreign jurisdictions was the most widely adopted measure (30 pS). Other measures (nine pS) showed a broad range of operational and preventive approaches, including specialized training for public officials, structured identification procedures, and child-specific operational algorithms for law enforcement and frontline services. Overall, implementation remains uneven, with reactive police training being more common than proactive registration efforts.

Measures to prevent, identify, and respond to child trafficking
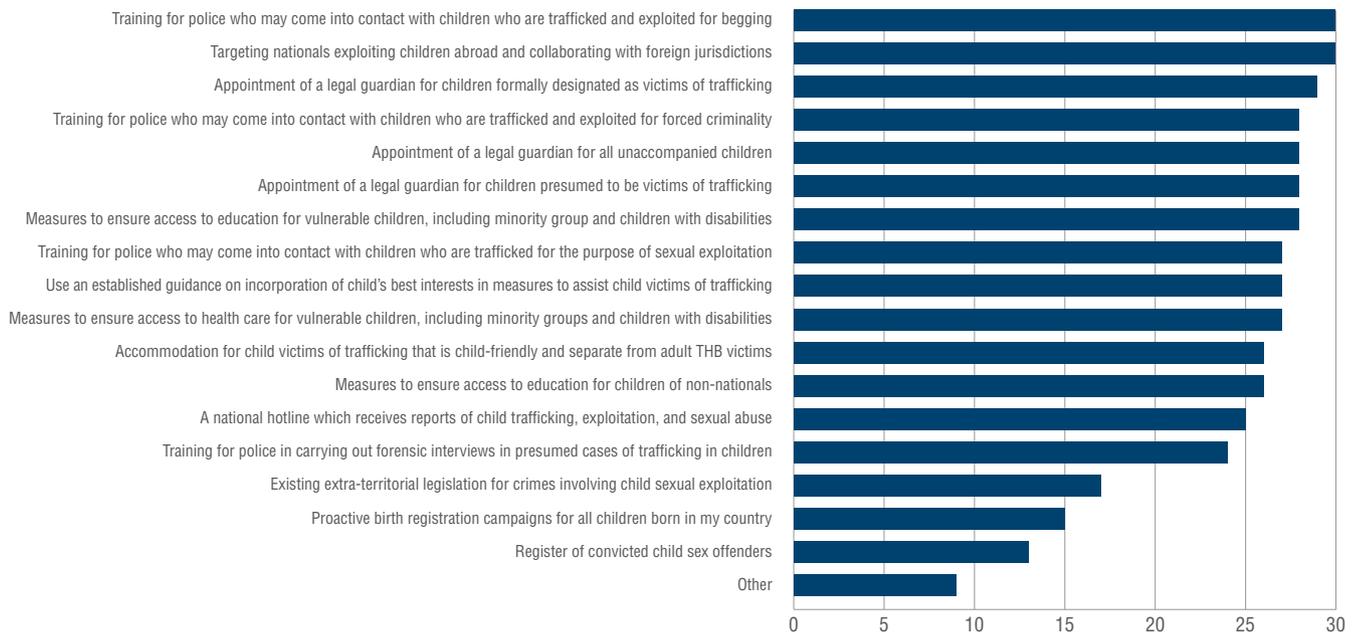
B3a: Measures to prevent, identify, and respond to child trafficking 2016-2026

Comparing data from all three Survey Reports suggests that pS have deprioritised measures to combat child trafficking over time. The information provided by countries offered no further explanation for this trend, though possible factors could include resource constraints, pandemic impacts, or shifting policy priorities. In any case, this development is cause for considerable concern, particularly as globally identification of child victims is rising to one third of all identified victims. However, information from those pS that did report relevant measures indicates positive developments in certain areas. Countries reported implementation of formal emergency and referral mechanisms, supported by dedicated hotlines, standardized procedures, and strengthened inter-agency co-ordination. Increased emphasis was placed on child-centred protection standards, including mandatory safeguarding requirements for organizations working with children and enhanced legal, psychosocial, and guardianship support. Nevertheless, several critical measures declined. Proactive birth registration campaigns demonstrated the strongest decrease (-17 pS since 2021; -19 since 2016), followed by support and services tailored to

the child's age and level of maturity as well as consideration for gender-specific concerns (-8 pS since 2021; -14 since 2016), and the use of best-interests guidance (-11 pS since 2021; -14 since 2016). The provision of child-friendly accommodation decreased by five pS between 2016 and 2021 and continued to decline thereafter. The appointment of legal guardians for all unaccompanied children showed a reduction of seven pS since 2021 (-11 pS since 2016), whilst other guardianship measures also demonstrated slight decreases. This is particularly concerning as it could hamper earlier identification and more adequate protection of child victims. Training for police on children trafficked for begging and for forced criminality, as the most frequently reported measure by 30 pS in the 2025/26 Survey, decreased steadily across the period (-5 pS since 2021; -9 since 2016). Registration of convicted child sex offenders was not explicitly mentioned in the 2015/16 Survey and showed a decrease by two pS in the last five years (2021: 15 pS). The steady decline in practical measures over the last decade indicates a concerning erosion of child safety standards and provisions to prevent child trafficking, which should be enhanced.

Measures to prevent, identify, and respond to child trafficking 2016-2026
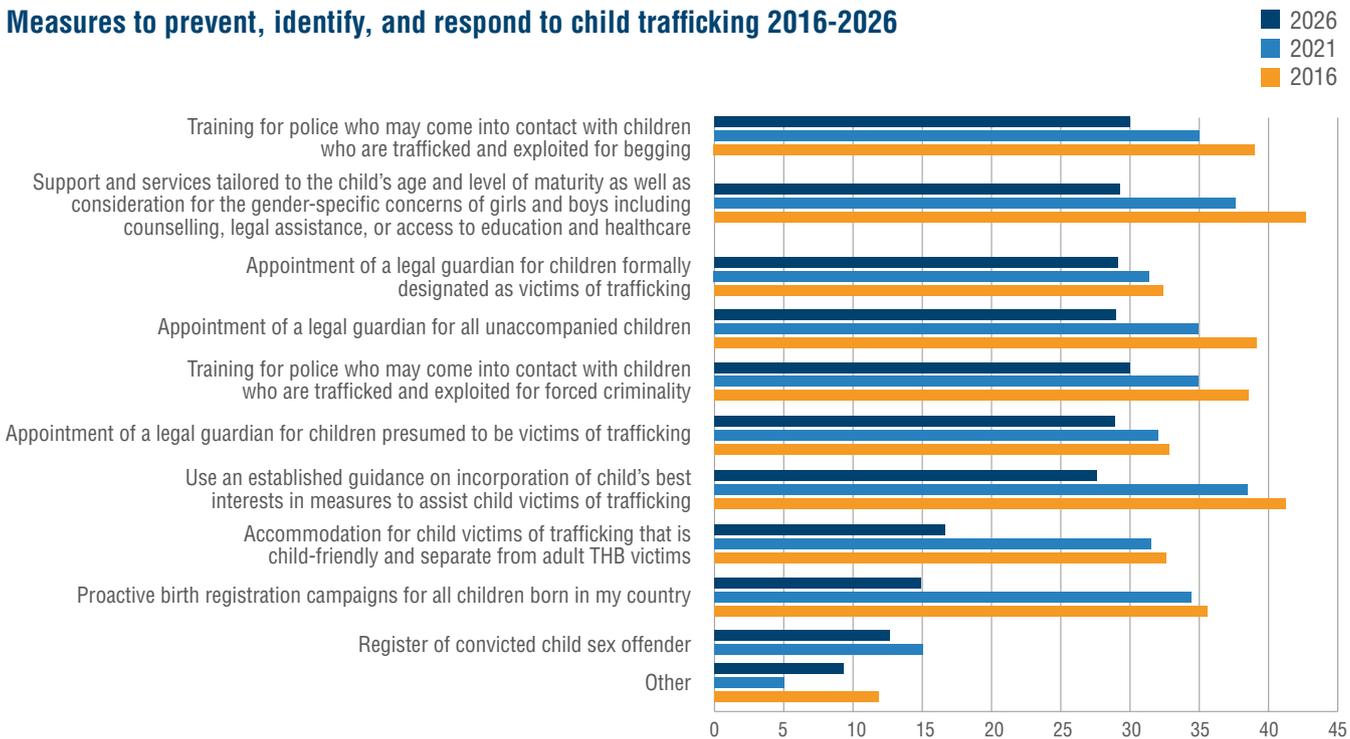
Legend: 2026, 2021, 2016

B3a: Measures to prevent child trafficking and sexual exploitation of children in the context of travel and tourism

The responses indicated fluctuating commitment by pS to measures in the context of travel and tourism. From a peak of 28 measures in 2016, the figure dropped to 21 in 2026. Despite methodological differences between surveys, a stagnation is evident. Measures targeting nationals exploiting children abroad and collaborating with foreign jurisdictions in relation to the tourism industry remained almost constant (-1 pS), as did existing extra-territorial legislation for crimes involving child sexual exploitation (+1 pS). The qualitative information provided by pS showed diverse approaches to prevention and detection. Several countries implemented training programmes for tourism professionals to recognize signs of trafficking and sexual exploitation and to ensure appropriate referrals to child protection systems. International campaigns were conducted in co-operation with specialized organizations, police, and the tourism sector. Some pS introduced mandatory child protection standards for organizations and businesses with contact with children, including hotels. Public awareness campaigns encouraged citizens to report suspected exploitation when travelling, whilst online reporting mechanisms and dedicated hotlines were established to facilitate reports of abuse. Several pS reported that co-operation with EUROPOL and INTERPOL was maintained to monitor nationals involved in child exploitation abroad. Others implemented notification requirements for registered sex offenders intending to travel abroad, with police authorized to inform destination counterparts and apply preventive orders restricting travel. Legislative measures in one country included provisions granting border officials powers to inspect digital devices of individuals arriving from countries where child sexual exploitation offenders were known to travel. Stagnation in tourism-related measures suggests that this sector remains for States a significant blind spot in prevention efforts and an area for enhanced attention.

Measures to prevent child trafficking and sexual exploitation of children in the context of travel and tourism

Legend:
- Targeting nationals exploiting children abroad and collaborating with foreign jurisdictions
- Existing extra-territorial legislation for crimes involving child sexual exploitation
- Measures to prevent child trafficking and sexual exploitation of children in travel and tourism
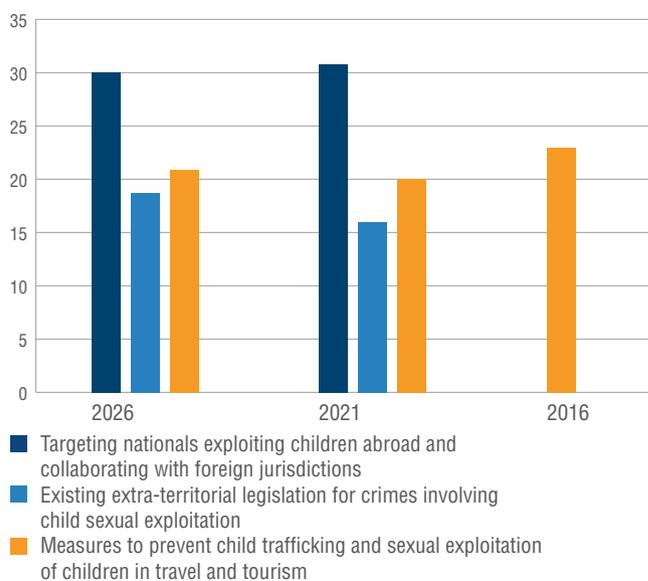
B3b: Measures targeting child sexual exploitation and CSAM online

Thirty-one pS responded to this question. The most common measures targeting child sexual exploitation and exploitation material (CSAM) online were taking down or limiting access to websites/online platforms that contain CSEM (28 pS) and operating a national hotline to receive such reports (27 pS). To a lesser extent, pS co-operated with technology platforms to remove child exploitation content through trusted flagger programmes, mandated online platforms and technology companies to proactively identify and remove CSAM, and partnered with civil society organizations in this field. Only eleven pS reported requiring tech companies to apply age verification for individuals depicted in explicit content or to limit children's access to pornographic websites. Eleven pS reported other measures that specified varied regulatory frameworks. Several countries empowered designated regulatory bodies to impose substantial financial penalties on platforms for non-compliance. One pS explicitly mandated restrictions on stranger contact with children to prevent grooming. Automated detection tools, including hash matching and URL matching, were employed in certain pS, alongside voluntary blocking schemes by internet service providers. Some countries required platforms to report detected content to law enforcement agencies to enable victim safeguarding and offender prosecution. While technical co-operation remains high, proactive prevention lags behind reactive content removal.

Measures targeting child sexual exploitation and CSAM online
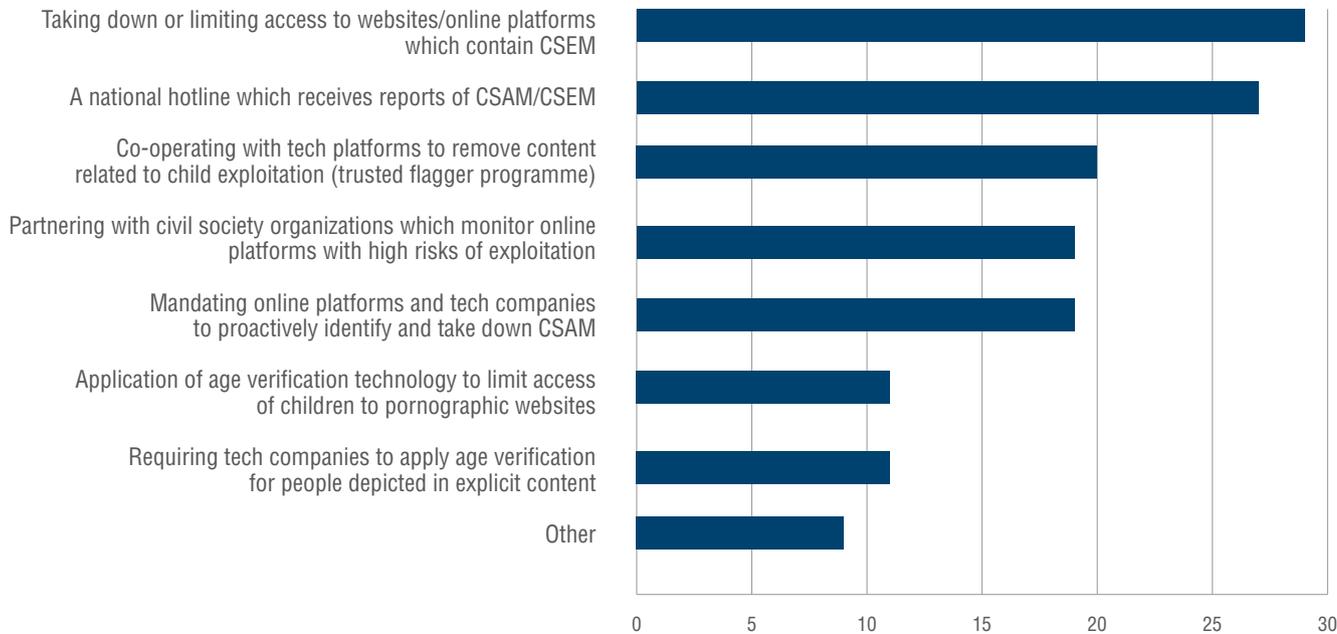
B3b: Measures targeting child sexual exploitation and CSAM online 2021-2026

A full comparison of responses related to targeting child sexual exploitation and CSAM online between 2021 and 2026 has not been possible due to new questions featured in the most current survey. However, data based on the four comparable questions suggests that there is progress in implementing measures to address these phenomena. Taking down or limiting access to websites and platforms containing CSAM increased substantially from 72 per cent to 90 per cent of responding States, while national hotlines for reporting CSAM had only a weak update from 85 per cent to 87 per cent. Application of age verification technology for explicit content and limiting children's access to pornographic websites showed an increase of 15 per cent in the last five years; mandating platforms to proactively identify and remove CSAM rose by 11 per cent. However, the overall number of pS that reported implementing such measures remained low, showing minimal improvement from 2021 levels. These figures suggest that whilst pS have made progress in reactive measures such as takedowns and reporting mechanisms, they have been less successful in implementing the proactive and preventive measures recommended in the 2021 Survey Report. Possible explanations for this disparity could be concerns about privacy and data protection, technical feasibility challenges, industry resistance, resource constraints, and/or a lack of harmonized regulatory frameworks across jurisdictions.

Measures targeting child sexual exploitation and CSAM online 2021-2026

■ 2026
■ 2021
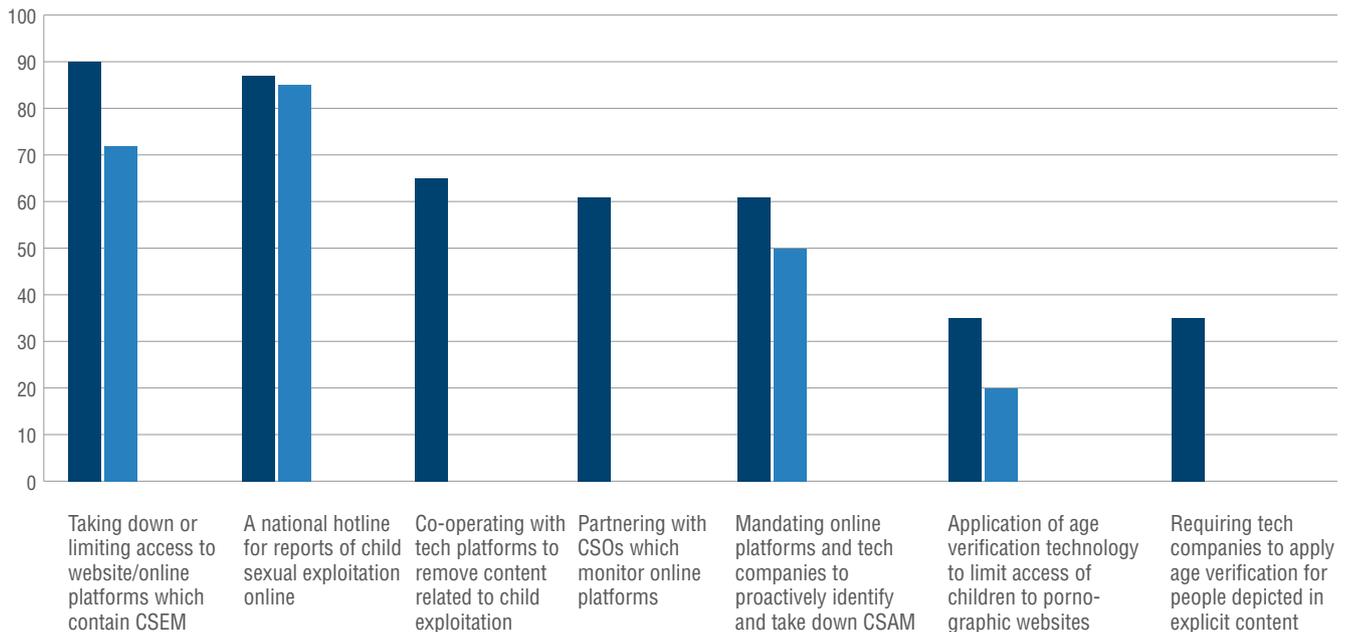
B3b: Access to global/regional databases on child sexual exploitation material

Most of the 30 States that confirmed having access to global or regional databases on child sexual exploitation material were connected to INTERPOL's Child Sexual Exploitation Image Database (ICSE) and EUROPOL databases (Secure Information Exchange Network Application - SIENA, Information System - EIS, Platform for Experts - EPE) (27 pS), which together accounted for half of all databases utilised. The three States without access to these databases were located outside the EU, of which one reported being in the process of joining ICSE. Additionally, a small number of countries referenced to other, mostly national databases in response to this question (five pS). Fifteen pS had access to the EU Commission's SIRENE (Supplementary Information Request at the National Entries). NCMEC and INHOPE, the most internationally recognised databases in co-operation with NGOs, were accessed by countries in similar proportions (12 and ten pS respectively). The project ARACHNID, a software platform deploying web crawlers to search for child sexual abuse material, and CALIOPE (Comparaison et Analyse Logicielle des Images d'Origine Pédopornographique) were at the lower end of the utilization scale (six and four pS respectively). It should be noted that the vast majority of pS reported using more than one database. The widespread use of international databases highlights the crucial role of cross-border technical co-operation.
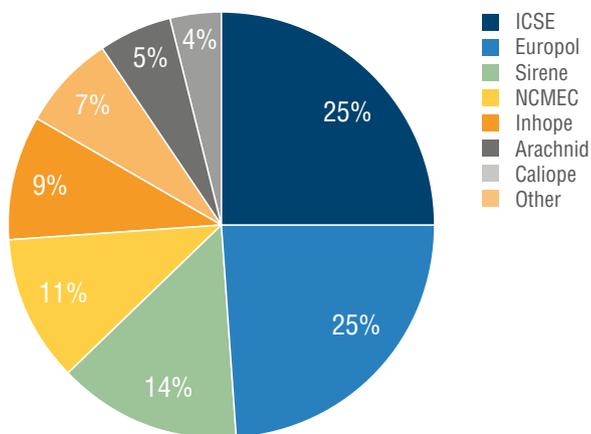
B3b: Measures to prevent, identify, and respond to child trafficking online and offline

The distribution of measure categories showed relatively balanced implementation across key areas of child protection in pS. Support and services tailored to children's maturity and needs, as well as targeting exploitation online were reported by each of 31 pS, whilst access to global and regional databases on CSAM and measures to prevent child trafficking and exploitation in travel and tourism were reported by 30 and 21 pS respectively. This relatively even distribution suggests that pS recognized the multifaceted nature of child trafficking and exploitation, addressing both online and offline vulnerabilities, prevention, and victim support. However, the comparatively lower engagement with travel and tourism measures suggests that this sector remained under-prioritized despite known and emerging risks like orphanage trafficking.[5]

Measures to prevent, identify, and respond to child trafficking online and offline

- Support and services tailored to the childs maturity and needs
- Targeting exploitation online
- Using access to global/regional databases on CSAM
- Measures to prevent child trafficking and exploitation in travel and tourism

Access to global/regional databases on child sexual exploitation material

- ICSE
- Europol
- Sirene
- NCMEC
- Inhope
- Arachnid
- Caliope
- Other

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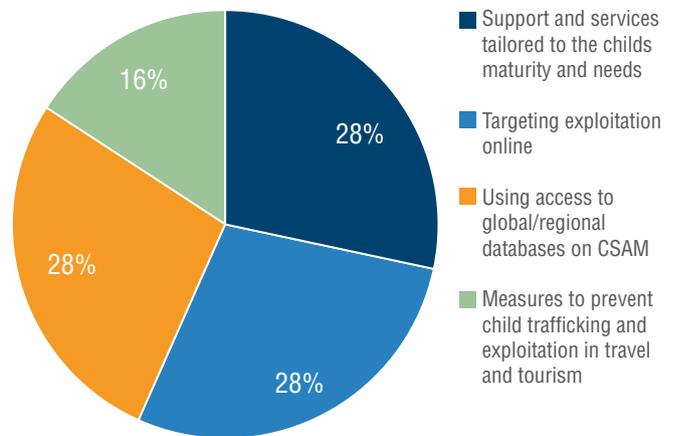
5   OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, 2025: The role of OSCE participating States in combating orphanage trafficking, Vienna.

B4: National focal point for child victims of trafficking

Thirty-seven of 51 pS reported having a National Focal Point for child victims of trafficking, a modest increase of three pS since 2021. However, the persistence of 14 countries without National Focal Points, and nine without immediate plans to establish them, represents a significant gap in the OSCE region's capacity to provide co-ordinated, child-specific responses to child trafficking. National Focal Points serve as critical co-ordination hubs for rapid cross-border information exchange with counterparts in other countries, including follow-up on identification, protection, and assistance measures, in line with national procedures and international commitments.[6] Their absence in over a quarter of pS suggests uneven protection standards and hinders efficient cross-border victim support.

B5: Participating States with established protocols for regular communication with other countries regarding child victims of trafficking

A new question featured in the 2025/26 Survey addressed established protocols for regular communication with other countries regarding child victims of trafficking. Of 50 responding States, 31 confirmed having such measures in place. Various pS reported using National Referral Mechanisms or bilateral agreements to manage information exchange. Responsibility for these international exchanges was often centralized within specific ministries, mainly the Ministries of the Interior or Justice, or managed through specialized units such as the General Prosecutor's Office. Furthermore, the data suggested that pS relied on existing international policing infrastructures, mostly through active use of INTERPOL and EUROPOL protocols and channels to address cross-border cases. Whilst most countries confirmed the presence of these protocols, the responses also revealed that 36 per cent of pS had no formal protocols in place.

National focal point for child victims of trafficking
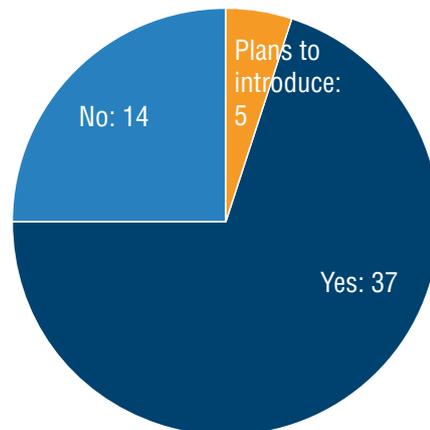
Participating States with established protocols for regular communication with other countries regarding child victims of trafficking

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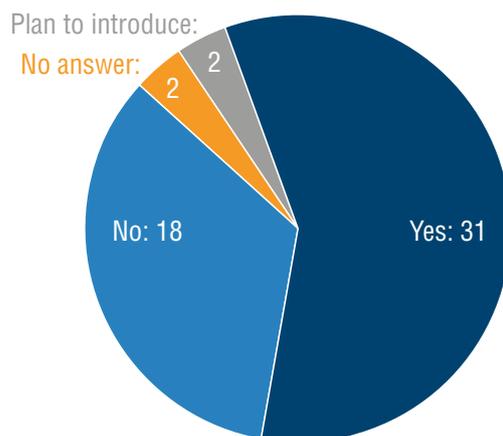
6   OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, 2020: Establishing National Focal Points to Protect Child Victims of Trafficking in Human Beings, Vienna.

B5: Measures with other countries regarding child victims of trafficking

In addition to the established protocols (see chart 'Participating States with established protocols for regular communication with other countries regarding child victims of trafficking'), the responses of 50 pS showed specific operational measures implemented to support and protect child victims of trafficking. Emphasis was placed on data security and prioritizing the protection of sensitive information during cross-border exchanges (24 pS). Such data exchange focused primarily on identification, protection needs, family situation and legal status, and was generally restricted to competent authorities in line with national law and international data-protection standards. Regular information sharing was reported by 22 countries, while 21 focused on ensuring that children on the move received continuous care and support across both transit and destination countries. Furthermore, 19 pS actively co-ordinated with international partners to safeguard children during the transit process. Here, strong emphasis was placed on the best interest of the child. Co-ordination was typically carried out through law enforcement, child protection authorities, diplomatic missions, and international organizations, notably IOM. Assistance measures included guardianship, safe accommodation, and access to care and support services.

Measures with other countries regarding child victims of trafficking
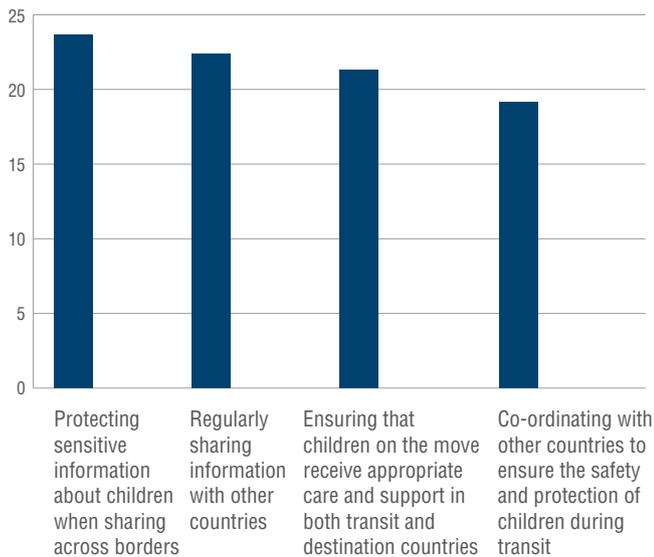
C General and targeted prevention and capacity-building

Analysis of results summary

General and targeted prevention and capacity-building became more professionalized through the use of survivor feedback. However, prevention remains unevenly applied across different sectors, and formalized structures for this engagement were often lacking. Civil society's replies suggest that their countries failed to utilize such feedback effectively in practice. In terms of discouraging the demand that fosters exploitation, there was a clear reliance on the 'knowing-use' standard, which only criminalizes the use of services from a trafficking victim if the buyer had prior knowledge of the exploitation, instead of 'strict liability' laws, which would close this legal loophole and more effectively deter the market for exploited labour and sexual services. Awareness measurement among the general population declined modestly, but there was an increasing focus on more sophisticated, digitally driven campaigns, which also featured built-in evaluation mechanisms. State-led interventions remained largely focused on immediate social assistance and economic empowerment for those at risk. Data suggests that deeper structural vulnerabilities were frequently left unaddressed. Furthermore, while training and capacity-building have expanded positively across law enforcement, judicial actors, and prosecutors, with growing emphasis on trauma-informed approaches, significant gaps remain in sectors such as education, hospitality, and service providers for persons with disability, as well as amongst trade unions.

C1: Feedback from identified victims used to inform prevention activities

Of 48 responding States, three-quarters noted that feedback from identified victims was used to inform prevention measures (36 pS), six per cent more than in the 2020/21 Survey (34 pS). Victims/survivors were mainly involved through interviews, surveys of service beneficiaries, casework feedback, and participation via NGOs or lived-experience advisory groups, rather than through direct engagement with authorities. States used their input to improve operational prevention, shape targeted awareness campaigns, and strengthen training for frontline professionals, including law enforcement and service providers. The information provided by victims and survivors focused on recruitment pathways, modus operandi of traffickers, physical or virtual exploitation settings and locations, vulnerabilities, identification barriers, and protection or recovery needs. Several pS highlighted that victims/survivors' feedback informed the development of policies and action plans, as well as using this information to adjust ongoing measures. What stood out was the frequent reliance on intermediaries (NGOs, reception centres, or other actors within national referral mechanisms) and the repeated note that formalized victim- and survivor-feedback structures were often absent or limited, even when their input influenced decisions.

In contrast, of the 21 NGOs that provided information, more than half said their countries did not use feedback to inform prevention activities (11 NGOs), revealing a discrepancy in eight countries. This mismatch suggests a perception gap between governments and civil society organizations regarding the practical integration of victim and survivor feedback into prevention measures.

Feedback from identified victims used to inform prevention activities

No: 25%

Yes: 75%
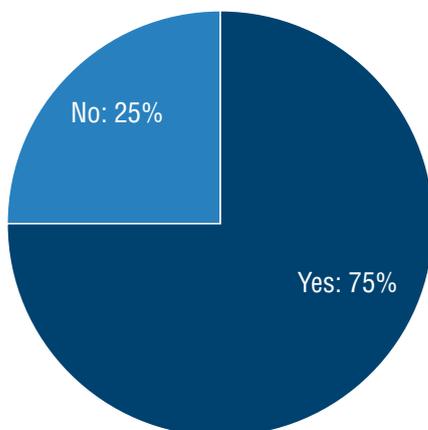
C2: Existing data on the level of awareness among the general population 2021-2026

The measurement of awareness among the general public about the risks of trafficking in human beings showed a modest decline, from 46 per cent of pS in the 2021 Survey Report to 43 per cent (21 pS) in 2026. Countries provided additional responses in great detail, though focusing more on campaign and study examples than on measured awareness levels. The information revealed a shift from traditional print media towards online awareness efforts, utilizing social media channels and messaging apps, as well as television spots. A significant portion of awareness-raising in recent years appeared to focus on 'digital immunity,' educating the public on identifying and resisting online exploitation attempts. Several countries reported targeting educational institutions and social service centres to address specific vulnerabilities of students and refugees. Stakeholders had increasingly integrated annual public opinion surveys into their workflows to measure programme efficacy and refine messaging, in particular for hard-to-reach or minority populations. Seven pS built in some kind of measurement around their campaigning, for instance, studies testing the effectiveness of campaign videos or public opinion polls, which shows a positive development in understanding awareness as a measurable metric rather than a vague goal.
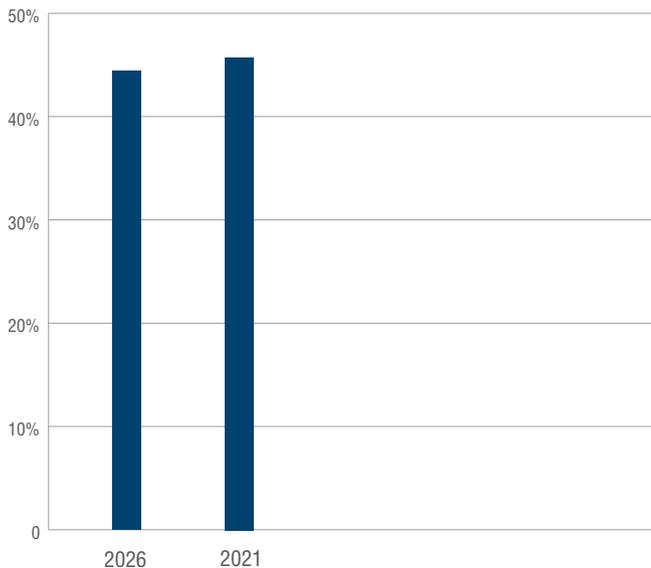
Twelve of the 21 responding NGOs reported collecting specific data on the factors that make individuals vulnerable to trafficking both into and out of their respective countries. Additionally, seven organizations collected data regarding the level of awareness within the general public or amongst specific target populations. These efforts primarily focused on general trafficking risks (seven NGOs), the nature of human trafficking (six), methods for self-protection (six), and identification and reporting (five). The shift toward digital literacy reflects an adaptive response to the increasing prevalence of online exploitation risks.

C3: Categories of population considered especially vulnerable to THB

When asked about population categories considered especially vulnerable to human trafficking, the vast majority of the 51 responding States identified women and girls (46 pS) and children in general (44 pS). They were followed by asylum seekers and persons with disabilities. In descending order, pS identified homeless persons, minority groups, persons without citizenship, and children without birth registration (23 pS). Other categories of persons were mentioned by 17 countries, including notably Roma and Traveller communities, children in institutional care, persons living in poverty, people with substance addictions, LGBTIQ+ individuals, seasonal agricultural workers, and temporarily displaced persons, namely Ukrainian refugees.

Existing data on the level of awareness among the general population 2021-2026

Categories of population considered especially vulnerable to THB
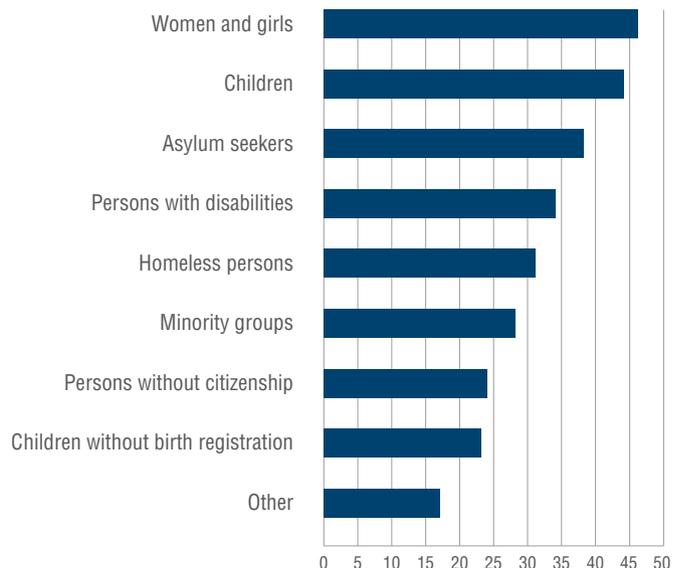
C4: Targeted prevention programmes for vulnerable groups

The responses on targeted prevention programmes for vulnerable groups suggested that pS prioritized direct support services addressing immediate physical and social needs over longer-term structural interventions. Social assistance (35 pS), economic empowerment activities (33 pS), and legal assistance (31 pS) were most commonly reported by the 48 pS that provided replies to this question. This relatively high uptake of economic empowerment and social assistance measures reflected an understanding by pS that financial vulnerability was a primary trafficking risk factor. Education about exploitation risks, investment in infrastructure, including affordable housing and mobility (26 pS) and strengthening access to education represented mid-range priorities, indicating incomplete implementation of structural measures across the region. Tailored awareness-raising for persons with disabilities (19 pS) and community leadership programmes (12 pS) were reported by fewer countries.

Targeted prevention programmes for vulnerable groups

C6: Legislative, educational or social measures that discourage demand that fosters sexual exploitation that leads to trafficking

Forty-six pS reported having legislative, educational or social measures in place to discourage the demand that fosters sexual exploitation that leads to trafficking. Whilst awareness programmes for the general public (36 pS) represented the most common non-legal intervention, criminalization was reported as the primary legislative pillar for discouraging demand. The data suggested a clear hierarchy in how countries approached the legal responsibility of sex buyers. The 'knowing-use' standard (31 pS) was the most widely adopted criminal measure, making

Legislative, educational or social measures that discourage demand that fosters sexual exploitation that leads to trafficking

the use of services from a trafficking victim a crime only if the buyer knew the person was exploited. Relying on the 'knowing-use' standard sets a legal threshold that potentially impedes the prosecution of those fostering demand, putting the burden on prosecutors to prove the buyers knew the individuals were trafficking victims. Significantly fewer countries (18 pS) had adopted 'strict liability' laws, which criminalized the use of services from a trafficking victim regardless of whether the buyer knew about the exploitation. Prohibition models varied, with 21 pS criminalizing both use and sale, and 13 countries criminalizing any use of sexual services, which targeted the buyer specifically to discourage the market entirely, regardless of whether trafficking was proven in that specific instance. Educational interventions targeting specific groups showed a modest uptake. Awareness and educational activities targeting men and boys (20 pS) and targeting sex buyers (17 pS) indicated that fewer than half of the countries had developed targeted prevention programmes for populations statistically more likely to constitute demand. Information campaigns targeting tourists (14 pS) reflected limited attention to travel-related exploitation despite known risks in this sector and increased convictions related to travel and tourism. Targeted law enforcement interventions at events attended by tourists and information campaigns before and during major sporting events demonstrated minimal proactive enforcement in potential high-risk contexts. Three pS reported having none of the listed measures in place. The mismatch between reactive legal standards and weak targeted prevention indicates a structural gap. While most pS have the theoretical instruments, they seem to lack either political will or institutional capacity for proactive demand reduction.

C6: Participating States with measures in place to discourage the demand that fosters sexual exploitation that leads to trafficking 2021-2026

States have made visible progress over the last five years in addressing the demand that drives sexual exploitation. Compared to the 2021 Survey Report, there was a 13 per cent increase in countries implementing legislative, educational, or social measures. Of the 49 responding States, 46 (94 per cent) reported having at least one such measure in place, up from 37 in 2021. Only three countries (six per cent) currently lack these measures, an improvement from the ten countries reported in 2021.

Participating States with measures in place to discourage the demand that fosters sexual exploitation that leads to trafficking 2021-2026
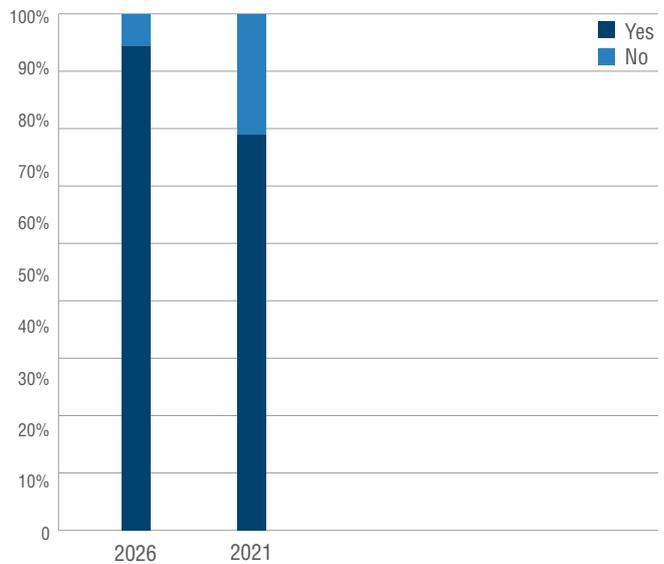
C7: Access to training resources related to interacting with victims and potential victims of human trafficking

Compared to the previous survey reports, the data provided by pS demonstrated a notable increase in the access to and frequency of training across almost all sectors. Although figures are not directly comparable throughout the three survey reports, as questions continued to evolve to best capture current developments, several key insights could be drawn from the data. Similar to the findings in 2021, law enforcement officials appeared to have had greater access to training than other groups. This was mostly evident among specialized CTHB police, investigators, and general front-line police, both in professional academies and in government-sponsored training. The growth in the training numbers observed among prosecutors and judges was noteworthy. This upward trend applied to government-sponsored training and was even stronger in the context of professional academies. Also worth highlighting is the increased access of labour inspectors to government-sponsored training related to interacting with trafficking victims, primarily received once a year. In contrast, training rates for border control officers remained relatively stable compared to previous years. A further positive development was the improvement in figures regarding trauma-informed approaches across all target groups, in particular among prosecutors and in the context of immigration and asylum. The current survey also introduced new data for education authorities and teachers, who ranked in the mid-range, as well as for service providers for persons with disabilities. The latter figures underscored an urgent need for pS to address deficiencies in these specific areas, where substantial protection gaps and systemic failures were potentially evident. Finally, the analysis indicated that there remained several sectors where either awareness of training opportunities was low or such opportunities had not yet been established, and where responding departments lacked knowledge about training for other groups. This lack of engagement was most visible within sports associations, trade unions, and the hospitality and hotel industries in general.

C8: Steps to harmonize training within/across different target groups

The responses of fifty pS revealed a strong emphasis on inter-agency collaboration, with co-ordinating training sessions between different agencies as the most frequent measure (40 pS). This was closely supported by multi-agency trainings (32 pS) and online or offline courses for multiple groups to build broad professional capacity. Additionally, 21 pS reported having translated international guidelines into the country's languages. While 11 countries reported using niche or country-specific measures not captured by the main categories, only five pS indicated none of the above steps. The emphasis on multi-agency training reflects a regional recognition that human trafficking is a cross-cutting issue that requires integrated professional responses.

Steps to harmonize training within/across different target groups

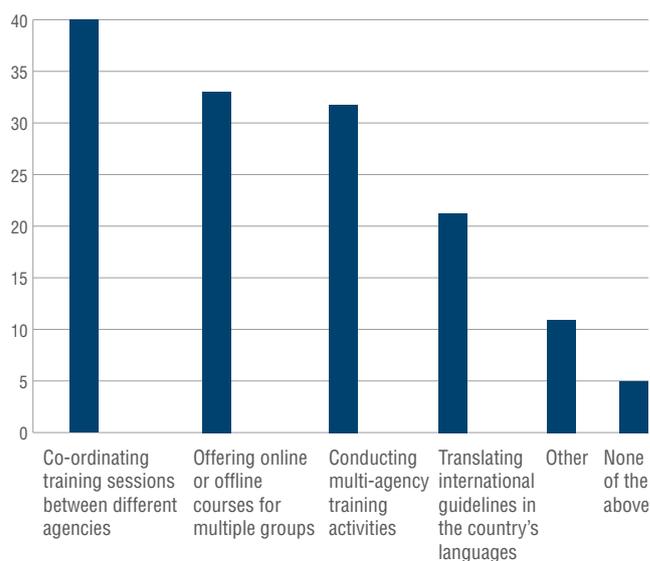## Access to training resources related to interacting with victims and potential victims of human trafficking

Occupation	Training through professional academies			Government-sponsored training						Training on trauma-informed approaches		
				More than once in past 12 months			Once in past 12 months					
	2026	2021	2016	2026	2021	2016	2026	2021	2016	2026	2021	Don't know/NA
Specialized CTHB police	28	22		22	23		16	15		19	16	13
Prosecutors	26	17		22	14		14	17		24	10	11
Judges	25	16		16	10		13	16		19	8	16
Non-specialized/front-line police	21	15		18	12		16	19		19	9	17
Investigators	24	15		16	14		21	19		24	10	15
Border control officers	19	13	16	16	15	15	17	15	14	19	4	12
Immigration officials	20	12	15	21	16	10	17	16	10	22	5	12
Customs officials	11	6	5	7	7	3	12	13	4	10	1	30
Labour inspectors	14	6	6	13	11	8	24	13	15	19	2	13
Public social service providers	13	5		13	5		21	19		21	4	15
Child protection authorities	16	5		17	9		15	12		20	6	17
Diplomatic/consular staff	13	5	4	11	9	6	17	12	11	17	1	23
Labour attachés		3	2		4	1		1	2		0	
NGO staff	9	3	8	16	15	11	11	8	9	24	5	19
Medical practitioners	10	1	2	10	7	3	13	6	5	14	5	26
International organization staff	6	1	3	5	3	2	8	5	6	8	4	26
Tourism authorities		0	0		2	2		3	2		1	
Trade Union staff	4	0		2	1		2	4		5	0	43
Hospitality industry staff	5	0	0	4	0	0	5	4	2	5	1	39
Employees of transportation companies	4	0	0	3	0	0	4	1	1	4	0	43
Sport associations and federations	2	0	0	1	2	1	2	1	0	2	0	47
Hotel staff		0	0		1	1		2	0		1	
Service provider for persons with disabilities	4			6			5			7		29
Education authorities, including teachers	15			14			9			12		25

Identification and protection

Section 2 addresses the frameworks for the identification and protection of victims. It examines the practical access to rights and the effectiveness of protection standards across the OSCE region while highlighting barriers that remain for vulnerable demographics. Sub-section D analyses the legislative and operational measures for prompt victim identification, emphasizing the importance of multi-disciplinary co-operation between State and non-state actors. Sub-section E presents the availability and quality of comprehensive support services, focusing on the formalization of individual needs assessments and survivor feedback mechanisms. Sub-section F reviews the legal protections afforded to victims throughout the criminal justice process, including the application of the non-punishment principle and the provision of physical security and civil redress.

SECTION 2

D Prompt and accurate identification of victims

Analysis of results summary

Prompt and accurate identification is the essential gateway to protection, assistance, and justice for trafficking victims. It determines whether individuals receive the necessary support to recover from exploitation and whether they can safely exit exploitative situations before further harm occurs. By 2026, most pS reported having established and improved legislative frameworks and operational measures for victim identification, a trend that has continued since the 2021 Survey Report. A notable positive difference to previous surveys is that pS are now placing a stronger emphasis on multi-disciplinary co-operation, including partnerships with civil society organizations. NGOs and police identified victims at comparable rates, and social service providers have substantially increased their identification activity, often acting as the primary gateway to support when individuals remain reluctant to approach the police. Although nearly all pS reported having presumed victim provisions, civil society responses suggested a gap between policy and practice, specifically in the transition from knowing what to do (i.e., guidelines) to being required by law and resourced to do it consistently.

Furthermore, grounds for terminating victim status have become more clearly defined, with a visible increase in terminations related to claims deemed 'improper' or a victim's refusal to co-operate with authorities. Screening in immigration detention facilities has declined sharply; at the same time, the number of identifications at national borders and through returnee processes has gone up. This indicates that tightened border policies may have deterred victims from entering formal asylum procedures, and that identification efforts were increasingly concentrated at entry and exit points rather than within domestic protection systems. Proactive identification by labour inspectors in workplaces and healthcare settings has remained weak since 2021, despite these being key areas where exploitation occurs. Regarding technological tools for identification, pS reported applying new methods, such as web-crawlers, for more efficient detection of ICT-facilitated sexual exploitation and human trafficking. Finally, a rising trend in self-reporting suggests a growing preference among victims for autonomous help-seeking channels.

D1: Legislation or measures concerning the identification of and assistance to victims

All 49 responding countries reported having legislation or measures concerning the identification of and assistance to victims. However, operational measures such as guidelines and indicators appeared to be more prevalent than enforceable rights of victims and service quality assurance mechanisms. Guidelines on identification were used by nearly all respondents, and most pS also had identification indicators in place (44 pS), which implies that systems were most developed when frontline professionals needed practical tools to recognize victims. Guidelines on assistance and referral to provide procedural direction for stakeholders were reported at a comparable level (43 pS). Slightly less frequent were legislation on victims' rights, service standards, and legislation on identification as the lowest reported category. This suggests that while practical tools are widespread, legally binding protections and quality assurance frameworks are less firmly established across the region.

Legislation or measures concerning the identification of and assistance to victims

D1: Legislation or measures concerning the identification of victims 2021-2026

All of the 49 pS (100 per cent) responding to this question reported having legislation or measures concerning the identification of and assistance to victims in place, which is an increase of 28 per cent compared to the 2021 Survey Report (41 pS). The significant increase in legislation since 2021 reflects a growing institutional commitment to victim identification across the OSCE region.

Legislation or measures concerning the identification of victims 2021-2026
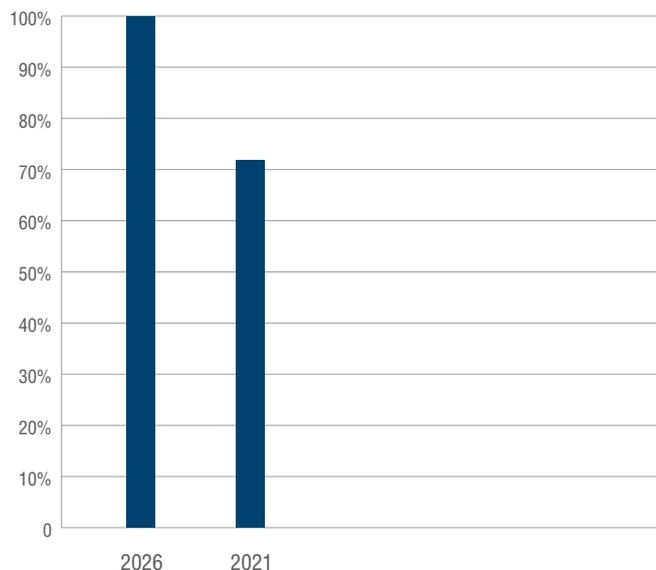
D3: Provisions for the formal recognition of THB victims outside the criminal justice system

Of the 49 responding States, 42 reported having provisions for the formal recognition of trafficking victims outside the criminal justice system. Six pS replied negatively to this question, and two gave no response. The reported widespread availability of non-judicial recognition pathways suggests that States are increasingly decoupling victim support from criminal prosecution, which facilitates immediate assistance and is a step towards a "social path" approach. At the same time, it seems that practical implementation and concrete mandates for the entities able to formally recognize victims of trafficking outside of the judicial process are still not sufficiently developed.

Provisions for the formal recognition of THB victims outside the criminal justice system
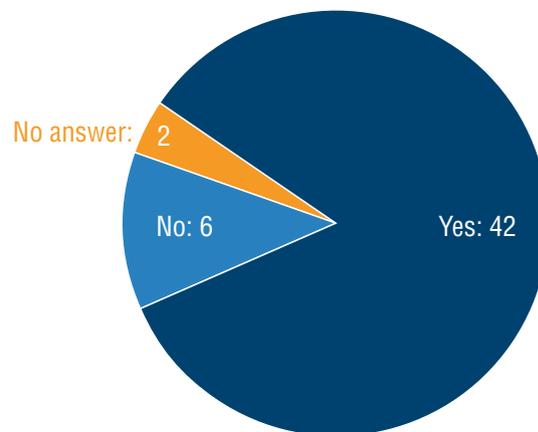
D2: Provisions for presumed victims 2016-2026

Looking at the presence of legislative or policy provisions for the category of presumed victim, allowing a victim to be provided with assistance without or prior to a formal status determination, 98 per cent of pS had such provisions in 2026, up from 89 per cent in 2021 and 75 per cent (39 pS) in 2016. The number of countries reporting no such provisions fell from four (2016: 7 pS) to one. The near-universal adoption of presumed victim status indicates a positive regional shift toward prioritizing immediate assistance over formal legal determination.
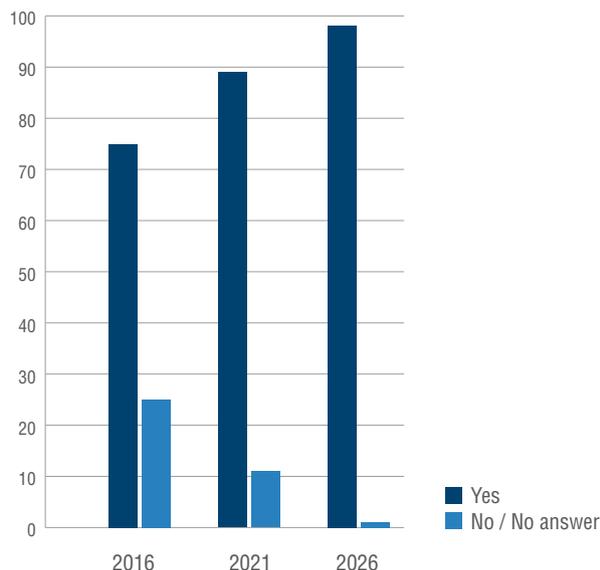
Provisions for presumed victims 2016-2026

Looking at pS responses, there was a clear shift in how victim status was terminated between 2021 and 2026. Almost every category saw an upward trend, suggesting that review procedures in pS became more rigorous and bureaucratic over the last five years. The most significant spikes occurred where the status was 'improperly claimed' (+10 pS from 13 to 23) or where victims refused to co-operate with authorities (+11 pS, from 5 to 16). This points towards a tougher stance adopted by pS, where protection is withdrawn far more quickly if a victim does not engage with the legal process. In contrast, the number of responses regarding terminations following a request of the victim fell slightly from 16 to 14 countries. The only substantial drop, however, was in the 'grounds not specified' category, with only ten countries compared to 16 in the 2021 Survey Report. This indicates that by 2026, legal frameworks became tighter on the one hand, but also probably more clearly defined on the other hand. However, the rise in terminations due to non-co-operation suggests that protection is increasingly contingent upon the victim's participation in the legal process, despite numerous international commitments requiring States' provision of victim assistance not conditioned on victims' participation in criminal justice processes. Coupled with increasing reluctance of victims to contact authorities, this is a worrying trend of decreasing victim protection.

**Grounds for victim status to
be terminated 2021-2026**

Legend:
- 2021
- 2026
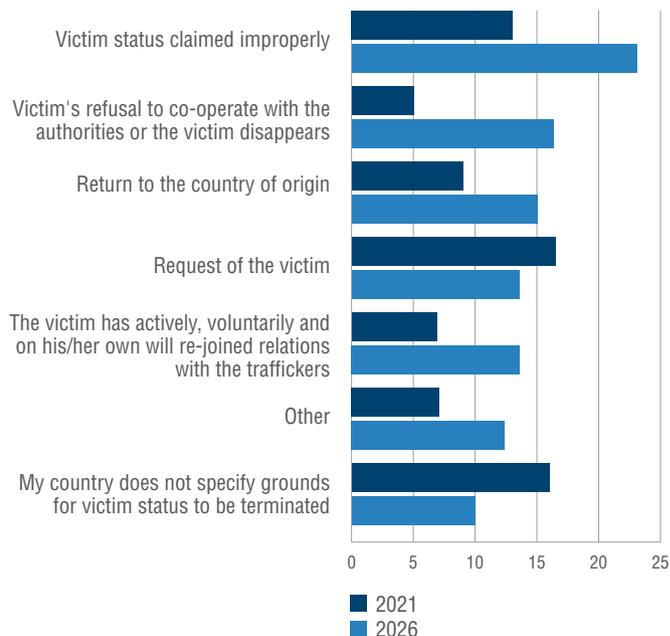
D5: Groups officially able to identify and refer victims of trafficking

The survey listed 19 groups of actors who might encounter trafficking victims and asked countries to indicate which were legally empowered to identify **presumed** victims, formally designate victims, or refer them to support services. Forty-eight countries responded. Identification of presumed victims was most commonly reported for police (specialized counter-trafficking units: 37 pS; non-specialized/front-line police: 34 pS), followed closely by immigration officers, border control officers, and approved NGOs (all 34 pS). Labour inspectors (33 pS), investigators (31 pS), and prosecutors (29 pS) were also reported frequently. Social welfare agencies (29 pS), medical practitioners, and other NGOs (each 27 pS) occupied the middle ground in the reported data. Least commonly reported were labour attachés (19 pS), judges (20 pS), customs officers (21 pS), diplomatic/consular staff (23 pS), trade unions, and educational staff (each 24 pS), who appeared as new categories in the 2025/26 survey, next to multi-agency task forces (25 pS). Whilst judges, given their role, are understandably uncommon in identification, the low figures for educational staff and social welfare agencies are more concerning, given these groups are likely to be in contact with presumed victims and often the only actor among these to do so. Regarding referral to support services, the data showed a similar distribution to the identification figures.

Formal designation of victim status remained concentrated amongst law enforcement bodies. Specialized counter-trafficking police (25 pS) and prosecutors (18 pS) featured most prominently, followed by judges (17 pS), approved NGOs (10 pS) and multi-agency task forces (10 pS - new group featured in the 2025/26 survey). The least formal identification authority lay with labour attachés, customs officers, international organizations, diplomatic and consular staff, and educational staff (3 pS). Almost no pS reported medical practitioners having the authority to formally designate victims.

Groups able to identify victims of trafficking 2026

Legend:
- Refer victims to support services
- Formally designate
- Identify as presumed victim
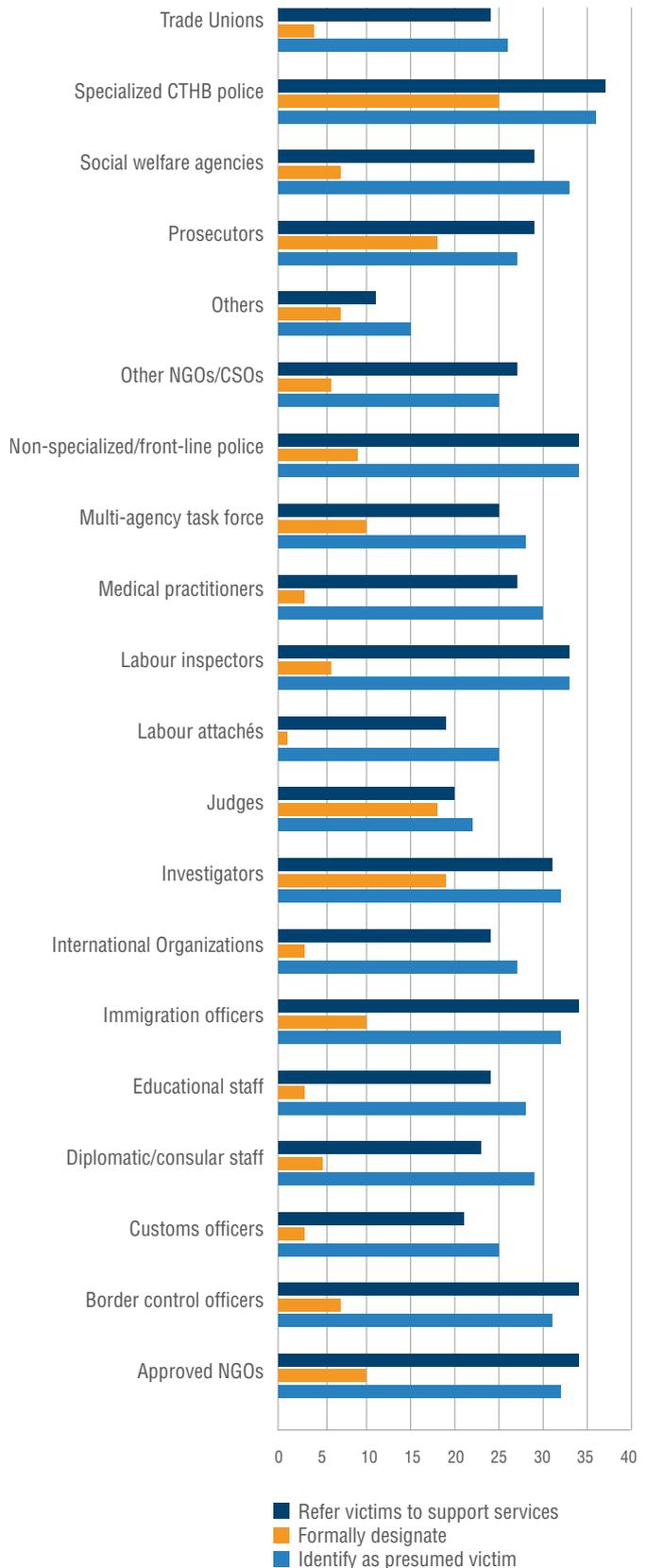
D5: Groups officially able to identify and refer victims of trafficking 2016-2026

Examining the three main groups typically involved in victim identification (police, NGOs, and social welfare agencies), a comparison from 2016 showed notable shifts. Because the 2015/16 survey did not break down the category 'police', and the subdivision into specialized police, front-line police, and investigators was introduced only in 2021, current data could be compared only with 2021 figures. For police, identification and referral numbers stayed roughly the same, but formal designation declined. For NGOs, where the 'refer' category was added only in 2021, the number of countries reporting NGOs/CSOs as authorized to formally designate victims more than doubled, whilst the other two capacities remained steady. For social welfare agencies, the most striking and worrying change was a drop in the number of countries reporting them as authorized to identify victims compared with earlier years. The concentration of formal designation power within law enforcement highlights a persistent criminal justice-led approach to victim status across the region, which likely dissuades victims from coming forward to seek assistance and contributes to relatively weak law enforcement results measured by successful trafficking convictions.

For a detailed comparison across all groups since 2016, please see the table "Groups officially able to identify and refer victims of trafficking 2016-2026" in the Download Centre.

Police (specialized, non-specialized/frontline and investigators) able to identify victims of trafficking 2021-2026
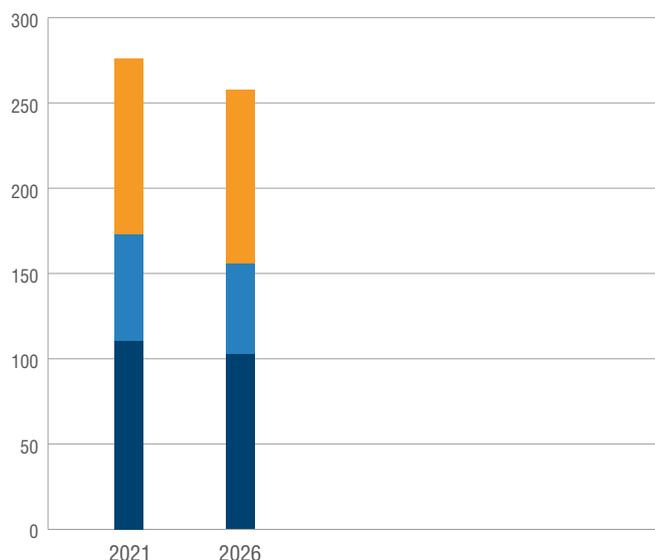
NGOs/CSOs (approved and others) 2016-2026
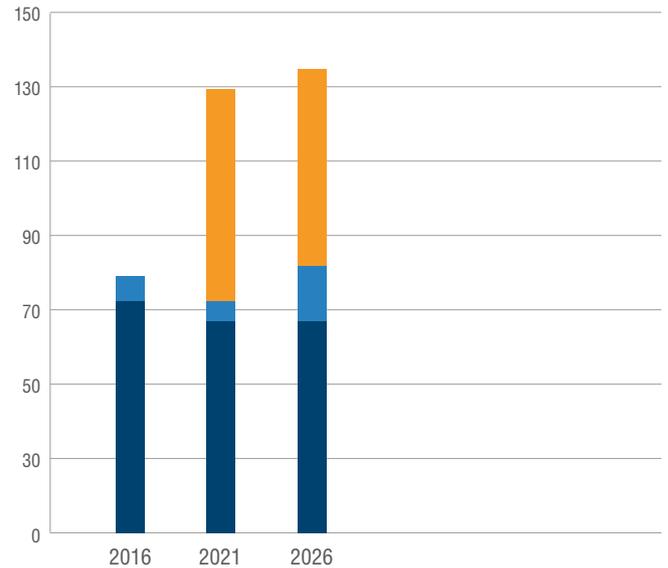
Social Welfare Agencies able to identify victims of trafficking 2021-2026
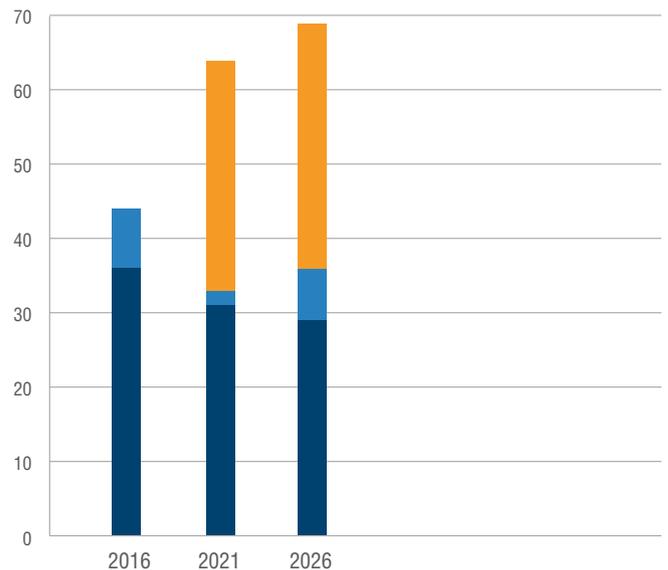
■ Identify as presumed victim
■ Formally designate
■ Refer victims to support services

D6: NGOs and CSOs access to state facilities and assistance with the timely identification of THB victims 2021-2026

Regarding NGO and civil society access to state facilities and assistance for timely trafficking victim identification, a comparison between 2021 and 2026 showed a positive trajectory. The number of affirmative responses increased from 35 to 39 countries, while both negative responses and countries not responding to this question slightly decreased from nine to eight States. This data suggests gradual but important improvements in collaborative frameworks for victim identification. In the additional qualitative data provided by 31 countries, most reported formal co-operation mechanisms between NGOs/CSOs and state authorities for victim identification. Many established multi-agency teams or commissions where civil society representatives often hold equal decision-making rights. However, civil society feedback from 21 NGOs suggested that these collaborative roles were often restricted to a small number of designated organizations, rather than the broader NGO sector. Furthermore, most countries explicitly referenced memoranda of understanding, formal protocols, or legislative frameworks that granted some NGOs access to state facilities, including reception and detention centres, usually contingent upon prior authorization. NGOs noted that this access was frequently inconsistent and heavily dependent on specific administrative directives or local prefectural approval, which sometimes created barriers to entry. To a lesser extent, States reported that specialized NGOs operated hotlines, conducted outreach in high-risk environments, including prisons and red-light districts, and provided immediate psychosocial and legal support to victims. However, several countries noted that while NGOs may assist in the process, the formal authority for victim identification remained exclusively with law enforcement or immigration services. Overall, while NGO access is improving, its reliance on administrative discretion and the concentration of formal identification authority within law enforcement remain significant hurdles for a consistent, protection-centred approach.

NGOs and CSOs access to state facilities and assistance with the timely identification of THB victims 2021-2026
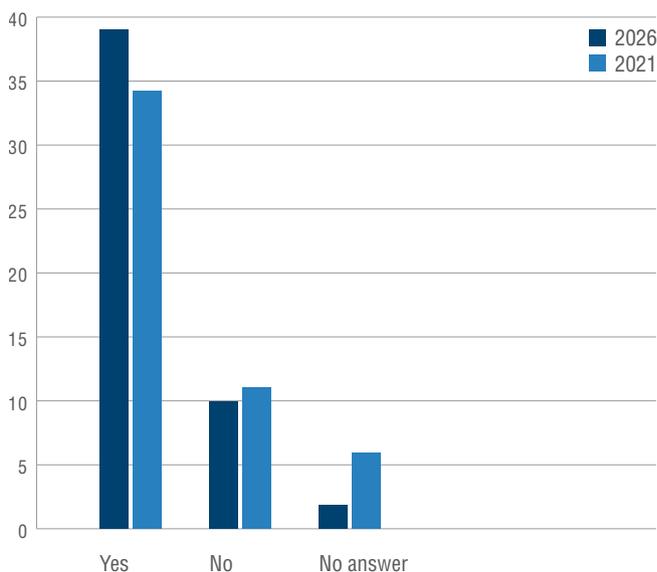
D8: Collection and publication of data on THB victims

Forty-nine responding States showed that sex-disaggregated data collection was nearly universal, with 46 countries reporting positively. However, gender data beyond the binary split respondents almost evenly (25 pS: yes, 21 pS: no). More pS reported not collecting ethnicity data (25 vs. 22 pS) than collecting it. Most countries made data on trafficking victims publicly available (38 pS), though eight missing answers suggested inconsistent publication practices. Across the survey responses, victim statistics were most gathered by state security and justice actors, primarily ministries of the interior, police, or specialized anti-trafficking units, which collected case-based information tied to criminal investigations or National Referral Mechanisms. A smaller role was played by specialized anti-trafficking co-ordination bodies, such as national rapporteurs or anti-trafficking commissions that aggregated multi-source data from law enforcement, social services, and NGOs. While 21 NGOs provided information to this question, only a few pS mentioned national statistical offices to ensure standardized reporting, for instance for Eurostat. Others explicitly reported no single system where data is shared across various authorities. The survey data also indicates structural gaps, where immigration databases excluded nationals, or parallel NGO datasets that remained separate from criminal justice records.

While 19 out of the 21 responding NGOs kept records on the number of cases of trafficking referred to them each year, only data from nine NGOs from six different countries were included in a national system of data collection, while four NGOs reported that this was not the case. According to six NGOs, their countries had no data collection system in place. The fragmentation of data across institutional silos and the limited integration of NGO records suggest that most States still lack a unified, multidisciplinary understanding of trafficking victims' profiles.

Collection and publication of data on THB victims

Legend:
- Yes
- No
- No answer
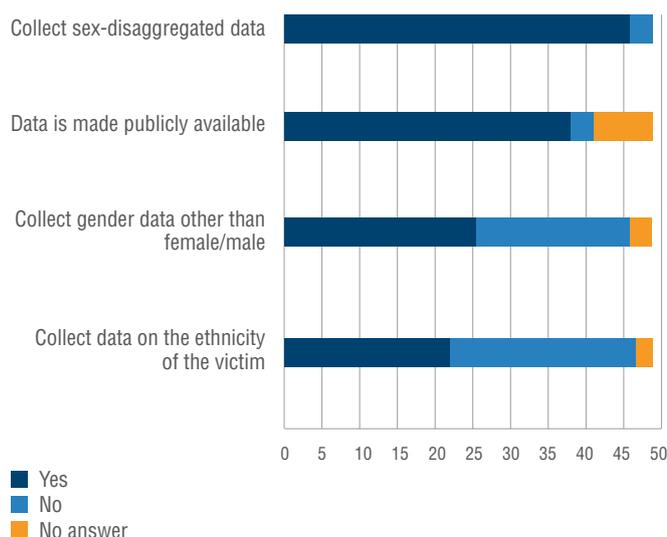
D10: Breakdown of identified THB victims
(presumed and formally identified)
by form of exploitation

The datasets provided by 45 responding States was somewhat incomplete, so the breakdown of cases must be regarded as indicative. To ensure coherence of the figures, data were manually cleaned and cross-referenced with publicly available statistics. As can be seen, the trends of recent years continued, though the number of victims is rising. Across data from 2018 to 2024, with a pandemic-related decline in 2020, the majority of reported cases continued to involve trafficking for labour exploitation (32 per cent of all cases, 9,389 cases) and sexual exploitation (21 per cent, 6,128 cases). Regarding other forms, forced criminality grew compared to previous years (17 per cent, 4,924 cases), as did human trafficking for more than one purpose (15 per cent, 4,262 cases). Unspecified cases increased slightly to

nine per cent of all cases (2,666 cases), whilst domestic servitude remained small but peaked in 2024 at four per cent (1,026 cases). Data on trafficking for organ removal cases remained negligible throughout (minimum eight, maximum 32 cases in the specified time period). Furthermore, pS reported other forms of trafficking, notably forced begging, forced marriage, illegal adoption, and servitude. Isolated instances included the trafficking of pregnant women for the sale of their children, the use of women as surrogate mothers, and the appropriation of allowances or social benefits as identified human trafficking cases. The persistent dominance of labour exploitation alongside the peak in domestic servitude highlights the necessity for strengthened oversight in traditionally private or less regulated sectors.

Breakdown of identified THB victims (presumed and formally identified) by form of exploitation
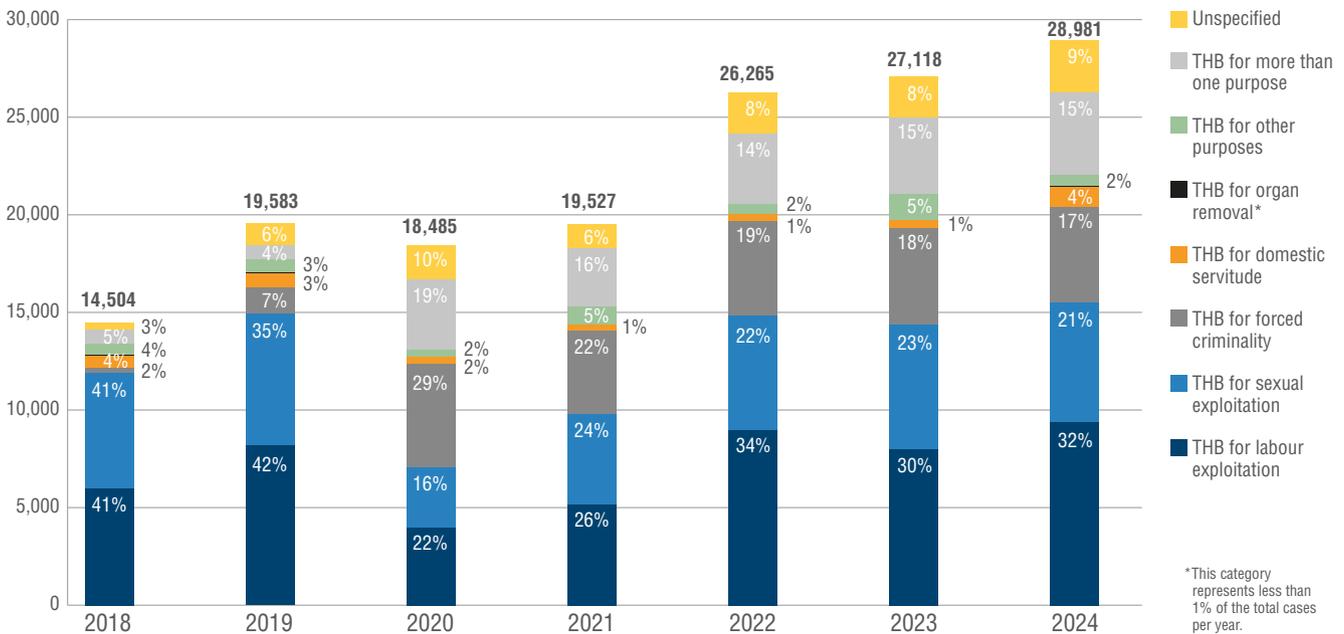
D11: Ukrainian victims of trafficking

The question about Ukrainian trafficking victims was newly added to the 2025/26 survey and responded to by 35 pS. The data should be regarded as indicative, as datasets were somewhat incomplete. Nevertheless, distinct trends could be observed. Whilst sexual exploitation was the most frequently reported form in 2021, followed by labour exploitation with roughly half as many reported cases, detected exploitation and trafficking of Ukrainian nationals peaked in 2022 at 997 cases. Information from pS showed labour exploitation as the predominant form during this period, followed at considerable distance by sexual exploitation and domestic servitude. Other reported forms included forced begging and slave-like conditions, the sale of children and illegal adoption. One country attributed its high number of Ukrainian nationals to two major investigations involving victims in beverage logistics and the meat processing industry.

Ukrainian victims of trafficking
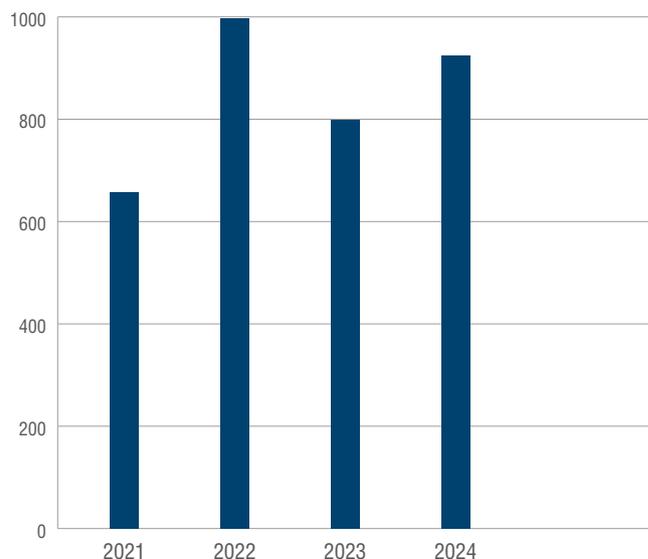
D13: Means of identification

Twenty-four pS provided information about the number of victims identified and referred through different channels and actors of identification in recent years. Despite this regrettably weak response rate, data allowed important insights into how cases came to notice, based on 18,277 cases for which this information was available. As can be seen, police and NGOs played almost equally significant roles, having identified 6,955 and 6,457 victims, respectively. A further 1,876 victims were identified through social services, as the most relevant three groups of identification actors. Other means of identification are listed in the chart 'Identification by other means 2021-2026' below.

Means of identification

Legend:
- By NGOs
- Through police intelligence, tip-offs
- By social services

42%
46%
12%
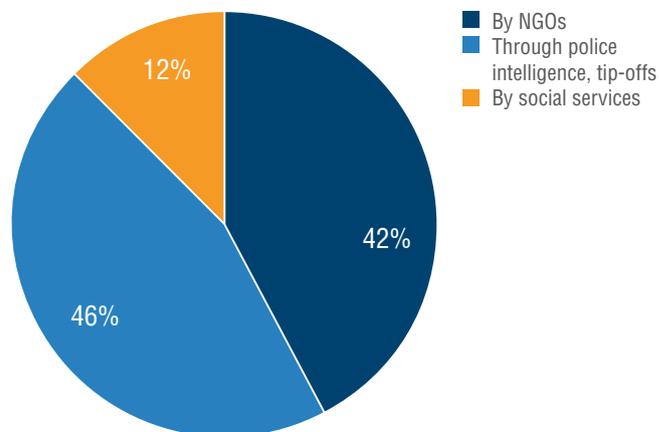
D13: Identification circumstances 2021-2026

A comparison of victim identification figures by actor groups revealed a different picture in the 2025/26 Survey Report compared with 2021. Whilst in 2021, by far the majority of the total 13,547 cases were initially identified by law enforcement officials (71 per cent, 9,556 cases), with just over 20 per cent identified by NGOs (2,782 cases) and only four per cent (595 cases) by social services, the most recent data showed that NGOs and police were almost on par. Identification through social services also surged by 215 per cent (from 595 to 1,876 cases). On the one hand, this points to positive developments regarding strengthened and formalized co-operation between NGOs, law enforcement, and social services. On the other hand, the data might also suggest that victims may be increasingly reluctant to approach police due to tightened migration policies (see chart D4: Grounds for victim status to be terminated 2021–2026).
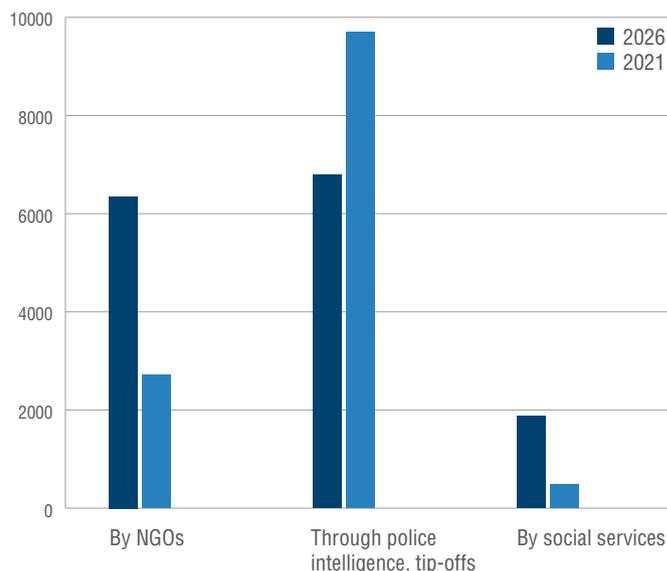
Identification circumstances 2021-2026

Besides police, NGOs, and social services, the survey asked about other means of identification of trafficking victims. Hereby, the data revealed two main trends: firstly, a shift away from detention centres towards border checkpoints, with a clear increase in identifications at entry and exit points and among returnees, suggesting that tightened border policies may be deterring victims from entering formal asylum processes. Secondly, the emergence of web crawling and the surge in self-reporting reflected both technological innovation and increased efforts to enable victims to seek help independently. The low response rate on these questions may bias the findings; but among the respondents the trends are clear. Identification through screening in immigration detention centres saw a sharp decline, falling from 36 reported cases in 2021 to just four in 2026. Similarly, figures for health and safety inspections dropped slightly from 20 to 16, while identifications by medical professionals decreased marginally from 39 to 34. There was a clear increase in activity at national borders. The number of identifications during exit from the country increased from seven cases to 63. While no dentifications were recorded during entry into the country in 2021, these cases reached 80 by 2026. This indicates newly implemented or strengthened border screening mechanisms at points of entry, likely in response to irregular migration flows and heightened awareness of trafficking risks among arriving populations. The number of individuals identified after being returned from another country more than tripled from 73 reported cases to 230, which suggests that victims are increasingly identified retrospectively after removal or repatriation. This points to gaps in the initial identification in the context of irregular migration or detention. The use of hotlines remained relatively stable, showing a modest increase of victims identified from 150 to 161. Despite their accessibility, hotlines accounted for less than one per cent of identifications throughout the reporting period of the 2025/26 Survey Report. Possible explanations include either low public awareness about the anti-trafficking hotlines and what kind of services they might offer or victims' reluctance to use such reporting channels. The steepest increase was visible in modernized tracking and voluntary reporting. Web crawling mechanisms, which were not covered by the 2020/21 survey yet, became a primary source of identification with 466 cases (2.5 per cent). Finally, walk-ins and self-identification remained the most frequent method, with an increase of cases from 289 to 882. The figure for 2026 was mainly attributable to the contributions of three States. The surge in self-identification and the use of digital detection tools suggest a transition toward autonomous help-seeking and modernized identification techniques.

Identification by other means 2021-2026
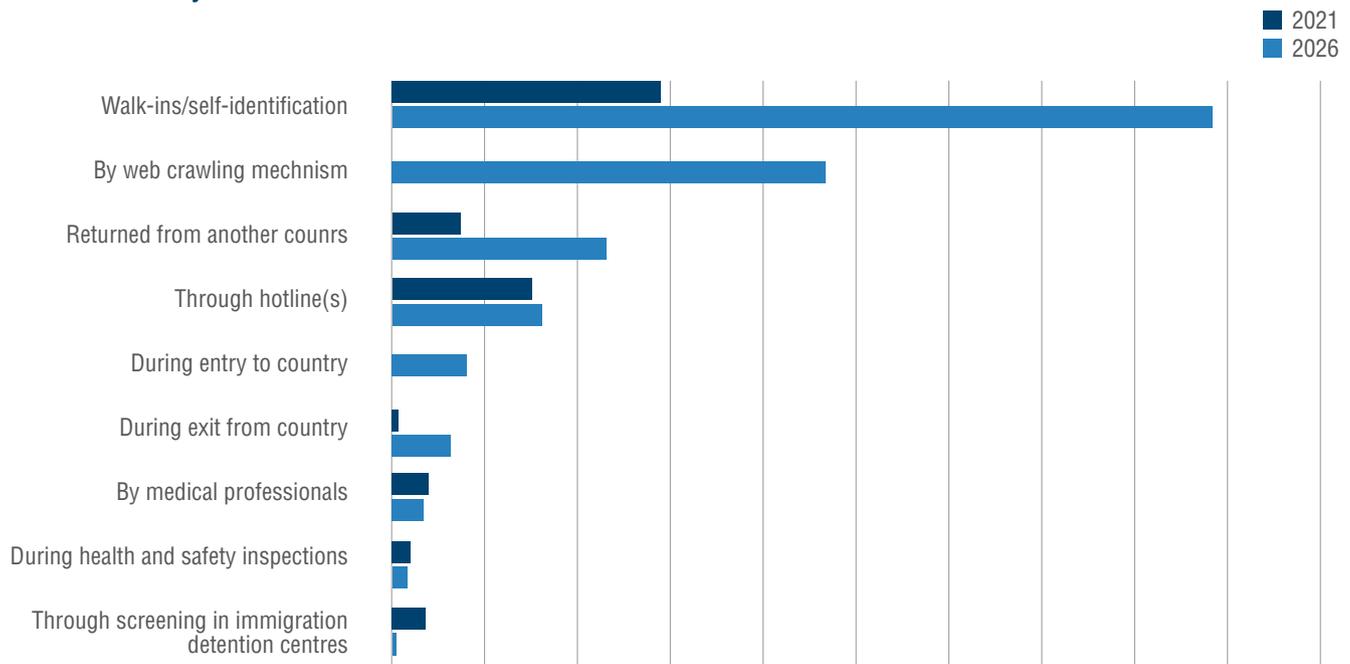
D11_NGO: NGO perspectives on the identification of trafficking victims

The perspectives of 21 NGOs on the identification of trafficking victims reveal gaps in timely identification and low confidence of victims in receiving support. NGOs most commonly agreed or strongly agreed that (1) victims avoided contact due to reluctance to work with police (72 per cent); (2) victims did not come forward because services seem unsuitable (57 per cent); and (3) victims feared being returned home (48 per cent). Most NGOs disagreed or strongly disagreed that front-line law enforcement was knowledgeable and skilled (62 per cent) or that law enforcement was proactive (58 per cent). Several highlighted problems with victim identification due to a lack of effective or regular training for groups that can refer victims to support services and to the unfamiliarity of actors with identification criteria (each 38 per cent). The survey data suggests significant gaps, particularly in the context of migration and asylum, where 43 per cent of respondents disagreed that their country had a clear and systematic procedure in place, and an equal number disagreed that there was sufficient training on unaccom-

panied and separated minors. Many NGOs considered victims as not aware of their right to assistance (62 per cent). 24/7 helplines appeared relatively strong (48 per cent), but with 24 per cent of respondents not knowing/not providing an answer to this question, this indicates a support gap. Many respondents additionally noted a lack of dedicated state-run hotlines and reported that underfunded NGO alternatives and language barriers hampered effective victim identification (29 per cent). Further key concerns by civil society organizations were the absence of NRMs and limited identification outside of the criminal justice process, which prevented identification in social or humanitarian contexts. Also, NGOs were concerned that post-traumatic stress disorder (PTSD) and the social stigma of exploitation often prevented or discouraged individuals from self-identifying as a victim, as well as frequent 'negative decisions' and poor experiences with the system. The lack of victim confidence in authorities suggests that fear of deportation and unsuitable services remain primary barriers to self-identification.

NGO perspectives on the identification of trafficking victims

E Victim support services
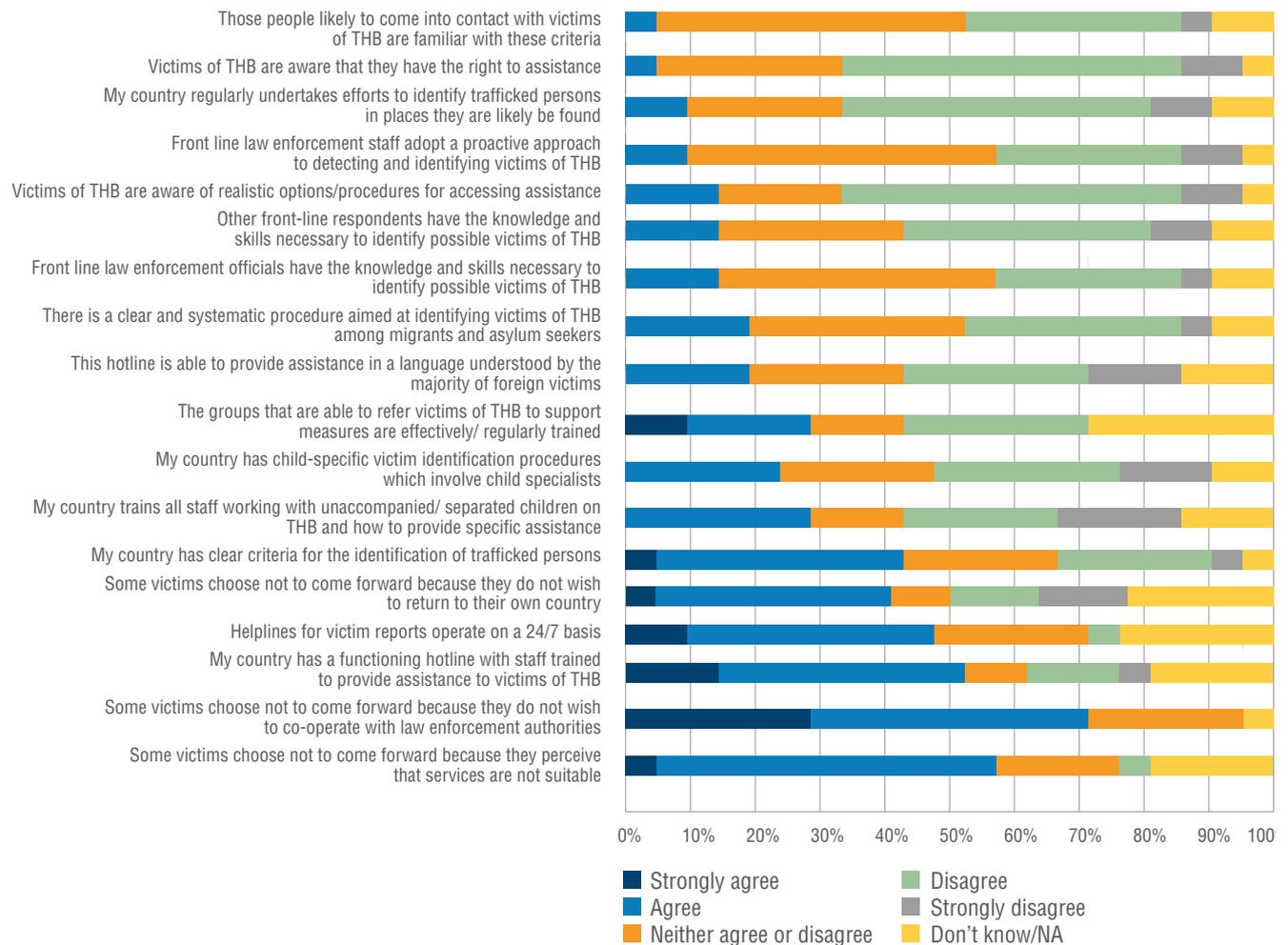
Analysis of results summary

In the realm of victim support services, while 67 per cent of pS confirmed established procedures to assess individual needs, adult females remained the primary beneficiaries, leaving male victims, LGBTQ+ individuals, and victims of labour exploitation underserved and not accommodated. Especially foreign male children faced the highest barriers to access: national male children received support at rates nearly five times higher than their foreign counterparts. A stark discrepancy persisted between national and foreign victims; for instance, medical assistance was provided to 1,380 national victims compared to only 858 non-nationals. The analysis also identified significant geographic disparities in service availability, as specialized support remained concentrated in urban centres, while victims in rural areas only had access to minimal assistance. Legal and financial hurdles, most notably the lack of health insurance and the absence of transitional 'bridge' benefits, remained critical drivers of vulnerability to re-trafficking. A prominent positive trend of the 2026 analysis was the rapid institutionalization of victim and survivor feedback inclusion, with the number of pS reporting active feedback mechanisms nearly tripling since 2021. Several pS launched formal survivor-led advisory bodies and councils to ensure that lived experience informed National Anti-Trafficking Strategies and professional training modules. However, the practical application of this expertise remained inconsistent. 75 per cent of responding pS claimed that survivor feedback informed prevention activities, while more than half of responding NGOs disagreed, reporting that such input was often informal or ad-hoc. 69 per cent of governments expressed satisfaction with specialized services, but only 32 per cent of NGOs concurred, underscoring a vital need for survivor-informed frameworks.

E1: Victim support services

Of the 46 responding countries, 67 per cent (32 pS) reported having established formal procedures to identify and assess the individual needs of victims before offering non-emergency assistance. Twenty-three per cent of pS still lacked such procedures. While most States mentioned using National Referral Mechanisms and multidisciplinary teams to tailor support to specific psychological, medical, and legal requirements (see chart "Procedures to identify/assess the individual needs of a victim of THB prior to offering non-emergency assistance" in the Download Centre), the survey also reveals an implementation gap between formal protocols and practical access of victims to services. The data across 16 service categories of 20 pS that responded to this question featured adult females as the largest demographic group that benefited from almost all support measures: in specialized shelters, medical assistance, and psychological support. A discrepancy is visible between national and foreign victims. In nearly every category, national victims accessed services at a higher rate than foreign victims. For instance, medical assistance was provided to 1,380 national victims compared to 858 foreign victims, which suggests potential barriers to access for non-nationals. A particular cause for concern was the low numbers for foreign male

children's access to victim support services. For almost every service category, national male children (approximately 110 on average per category) have access rates nearly five times higher than foreign male children (23–25 per category). NGOs noted that severe infrastructure deficits exacerbated this situation. In some regions, only one in 20 beds in specialized shelters for trafficking victims was available for boys, even though they make up a significant share of trafficking victims. This data indicates a profound systemic inequality in access to support services, particularly affecting foreign national and male child victims.

Additional information from pS pointed out further gaps. Firstly, a critical shortage of specialized accommodation and shelter capacity, which counts as a primary barrier to victim recovery. Another recurring trend was the lack of tailored support services for male victims, LGBTQ+ individuals, and those subjected to labour exploitation. Significant geographic disparities persisted across the region, as most support services were in urban settings, while victims and survivors in rural areas had limited assistance. One NGO described it as a "postcode lottery of service provision." Furthermore, language barriers and a

Victim support services

Foreign
- Adult female
- Adult male
- Child female
- Child male

National
- Adult female
- Adult male
- Child female
- Child male
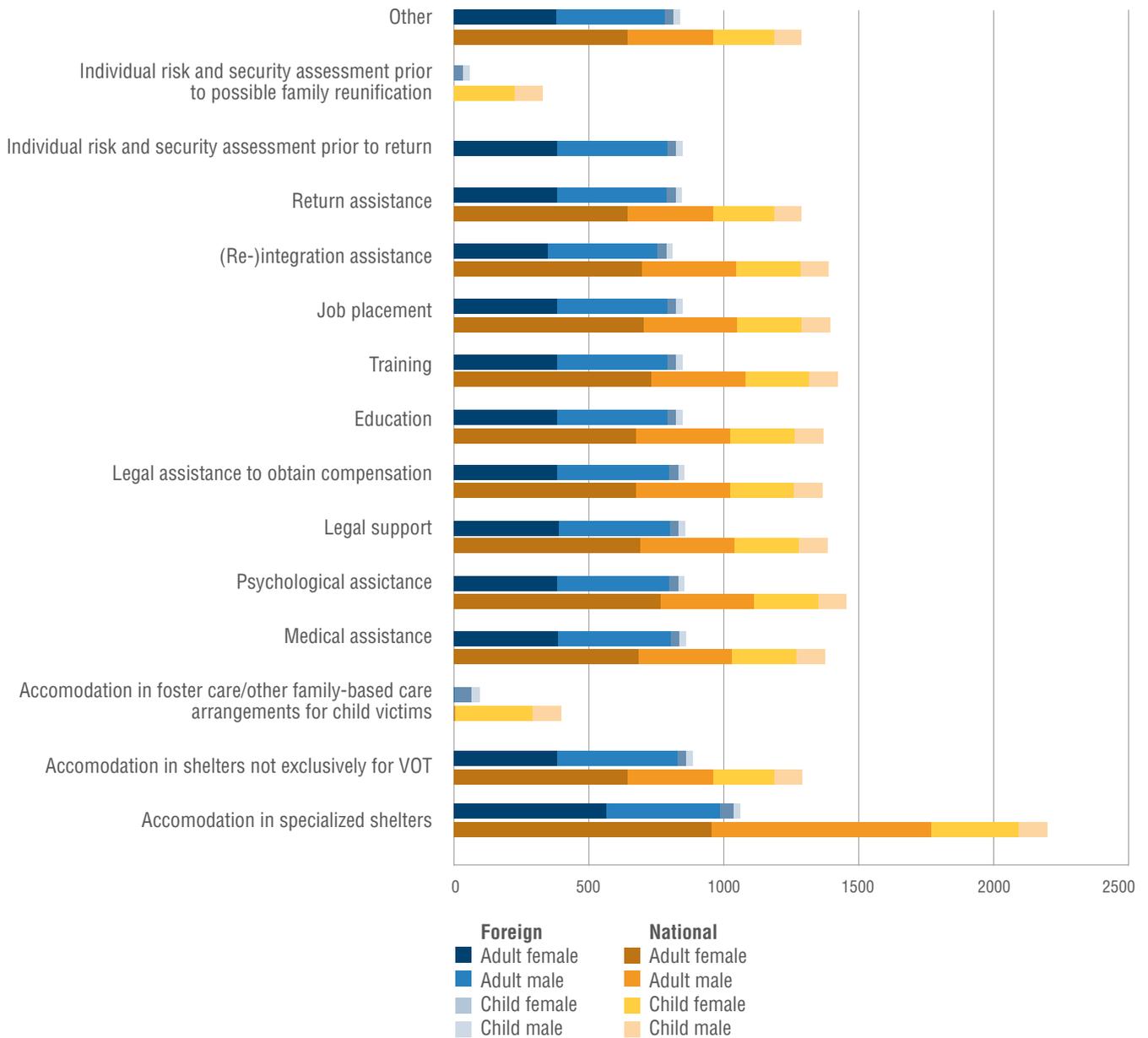
lack of translators necessary to communicate with victims from third countries, and high staff turnover in social sectors were frequently reported to hinder both the identification process and the delivery of comprehensible information. Legal and financial challenges, namely restricted healthcare access due to a lack of insurance and an absence of benefits for victims until they enter the labour market, further increased their vulnerability. These structural and geographic barriers suggest that victims' recovery is often determined by their location and legal status rather than their actual needs.

E5: Mechanisms to collect feedback from victims of trafficking on the services provided to them

Of 48 responses, 33 pS reported having feedback mechanisms from victims of trafficking on the services provided to them, which is a significant shift toward victim-centred accountability across the OSCE region. States employed a mix of formal and informal methods to capture victim and survivor experiences. These included anonymous complaint boxes in consultation rooms, anonymous surveys and focus groups, and listening sessions or formal public comment processes. In some cases, feedback was gathered through 'peer-to-peer' projects or advisory boards to specific counselling centres. A visible trend was the use of feedback to shape high-level policy. Survivor input was reported to be frequently used to draft national anti-trafficking strategies and action plans. Insights were also used, for example, to improve conditions in shelters and to expand psychosocial support. Two countries highlighted that testimonies and 'lived experience' were integrated into educational modules and awareness-raising materials for professionals. There was also a growing recognition of the need for survivor-led initiatives across

pS. Three countries reported to be launching or having established 'survivors' bodies' or councils to ensure survivors are "part of the solution" rather than just recipients of care. Despite the positive numbers, feedback seemed to have remained limited, often informal and indirect (via service providers, implying a certain degree of a conflict of interests). Two pS mentioned that a lack of multilingual complaint mechanisms remained a barrier for foreign victims. The institutionalization of survivor feedback marks a move toward inclusive governance, yet its informal nature and language barriers continue to limit its effectiveness for foreign victims.

E5: Existence of mechanisms to collect feedback from victims of trafficking on the services provided to them 2021-2026

Looking at developments since 2021, the figures reveal a significant improvement in institutionalizing the perspectives of victims and survivors across pS. The number of States with active feedback mechanisms has nearly tripled, to 34 in 2026 (2021: 12 pS). This indicates that survivor-centred governance has been moved from a niche NGO practice to a more mainstream State requirement. The introduction of three countries currently 'in the process' of establishing such systems suggests that the upward trend will continue through 2027.

Mechanisms to collect feedback from victims of trafficking on the services provided to them
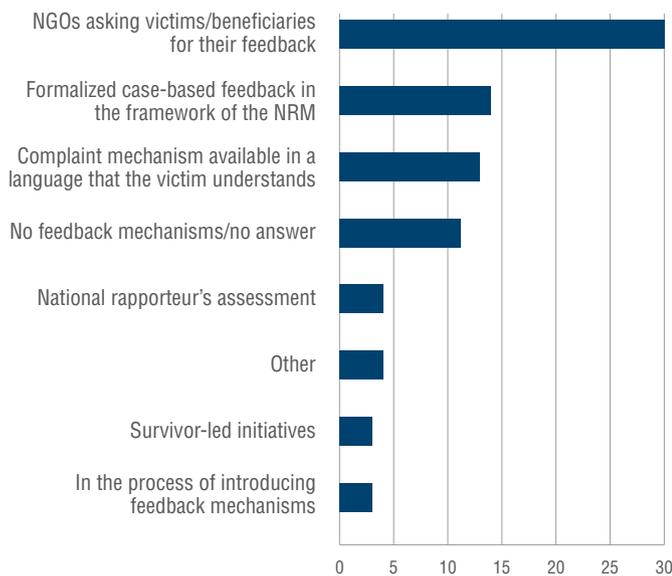
Existence of mechanisms to collect feedback from victims of trafficking on the services provided to them 2021-2026
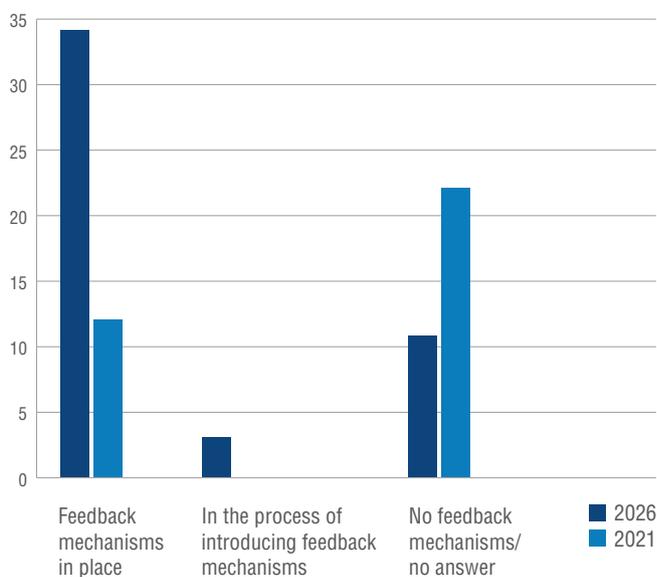
F | Support throughout the criminal justice process

Analysis of results summary

Support throughout the criminal justice process showed a steady formalization of enforceable rights, yet with concerning gaps regarding physical protection of victims. The non-punishment principle is now reported by 46 pS, with a significant shift toward separate, THB-specific legal provisions. While procedural protections within the court room, for instance video links and support persons, have reached near-universal adoption, high-intensity physical security outside the court, such as victim relocation and bodyguards, has seen a downward trend. This could be explained by high costs and a perceived low 'return on investment.' A systemic 'deportation barrier' continues to undermine civil redress: 87.5 per cent of pS provided redress pathways for national victims; this was practically inaccessible for foreign victims, who were often deported before they could seek a remedy. Additionally, from the experience of NGOs, State compensation remained effectively unavailable to the majority of victims in practice, despite some cases of successful compensation claims given by pS.

F1: Non-punishment principle 2021-2026

 Compared to the 2021 Survey Report, there were important developments in the responses of 46 pS regarding the non-punishment principle. Of these, the most positive was the reduction in the number of pS that reported having no non-punishment principle at all to just three countries (-6 pS). Equally significant was the increase in pS implementing the principle through separate legal provisions in criminal legislation (+4 pS). This movement towards specific legislation was underscored by a decline in reliance on general criminal defences such as duress and necessity (-6 pS), and a decrease in countries selecting 'Other' (-7 pS). While the discretion of the prosecution on a case-by-case basis remained stable, a new nuance emerged in 2026 with six countries reporting that their provisions were limited to certain administrative or criminal violations, which was a new response option featured in the 2025/26 survey. Additionally, pS reported a diverse range of legal approaches to non-punishment that went beyond dedicated statutes. A few countries did not have a specific statutory non-punishment provision and relied on prosecutorial guidelines and the assessment of public interest or social harmfulness to decide whether to proceed with a case. Others preferred to use general legal defences such as constraint or state of necessity; and one country noted that while the principle was prescribed in its Criminal Code, no actual cases had yet been processed under it.

NGOs presented a more critical view and highlighted that, despite improved legal frameworks, the non-punishment principle remained largely inaccessible to victims in practice due to systemic barriers. These included front-line officers frequently ignoring the non-punishment principles, especially when victims lacked residence permits or were involved in immigration violations. In one country, legislative changes narrowed the scope of protection and excluded victims of crimes they were compelled to commit while being trafficked. Several States highlighted that foreign and male victims faced greater difficulties accessing protections than female victims of sexual exploitation, often due to a lack of culturally sensitive support or specialized pathways for non-EU nationals. The persistence of these practical barriers suggests that legislative progress in pS has not yet translated into equal protection for all victim groups.

Non-punishment principle 2021-2026

Legend: 2021, 2026
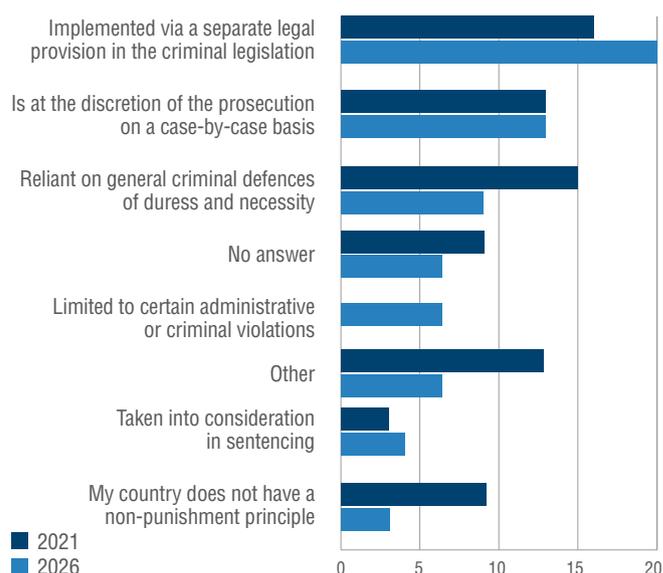
F2: Possibility to erase, vacate or annul the criminal record of the identified victim of trafficking concerning the crime that was committed as a direct result of being trafficked

Twenty-four of the 50 pS that provided information on this question reported the possibility in their jurisdictions to erase, vacate or annul the criminal record of the identified victims if the crimes were a direct consequence of their exploitation; two other countries were preparing corresponding legislation. However, the fact that 14 pS still had no such regulations and ten others did not provide any information highlighted an implementation gap, especially against the backdrop of general progress in the principle of non-punishment. This means that in some regions, victims could clear their records, but in other regions they would remain stigmatized and constrained by criminal convictions that were obtained under duress and coercion. States that allowed for the erasure or vacatur of criminal records reported using different legal path-

ways: some used specialized statutory mechanisms to expunge or overturn convictions. Others relied on general criminal law defences, such as duress or necessity, to prevent convictions from the outset. Some States also reported automatic expiry provisions or frameworks that ensure that, after the principle of non-punishment has been applied, victims were legally treated as if no conviction had ever taken place. The additional text answers provided by pS allow the conclusion that the general understanding of vacatur provisions is lacking among the respondents. Consequently, the limited possibility in the OSCE region to erase criminal records acquired as a result of being trafficked remains a significant obstacle to the full reintegration of victims and survivors and end of harm caused by trafficking.

Possibility to erase, vacate or annul the ciminal record of the identified victim of trafficking concerning the crime that was committed as a direct result of being trafficked

- Yes
- My country does not have such a provision
- My country is in the process of introducing such provision
- No answer
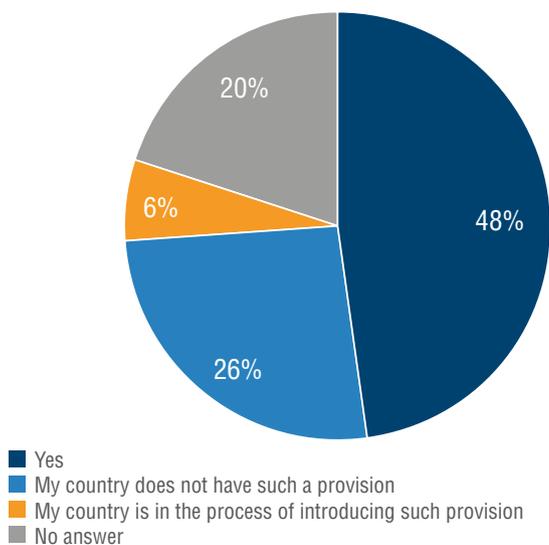
F3: Protections provided for by legislation on cases of trafficking 2026 and 2021

The updated 2025/26 survey findings indicate a positive trend towards the formalization of victim protections provided for by legislation, with limitations in practice. The most significant developments could be found in the expansion of state-funded support and the rights of foreign victims. The number of countries providing support regardless of the victim's co-operation with the prosecution rose from 29 to 36. Thirty-seven pS reported having established specialized State funds or budgets for victim compensation (+6 pS), while a slight decrease in the number of States was visible when it came to redress. There was a steady increase in the legal frameworks regarding residence (+2 pS) and work permits (+3 pS) for foreign victims. Legal aid mechanisms have become slightly more robust. The 2025/26 survey also introduced new categories of protection that were not assessed in 2021: 40 pS provided access to an interpreter, 26 provided access to a cultural mediator, and 38 have made audio or video recordings admissible as evidence in cases involving child victims. Additionally, 40 pS had provisions of free legal counselling for victims during criminal proceedings. 31 pS reported having introduced statutory provisions to purge the criminal records of victims for crimes committed as a direct result of being trafficked, seven more than in the standalone question about the possibility to erase, vacate or annul the criminal record concerning the crime that was committed as a direct result of being trafficked. At the same time, a closer look at the additional informa-tion provided in answers to that question indicates low level of understanding of the meaning of such a provision. In general, qualitative data from pS suggested varying application of these protections across the OSCE region. For instance, reflection periods ranged from 30 to 90 days, or countries linked residence permits closely to the duration of criminal proceedings.

Despite these legislative advancements reported by pS, NGO replies were less positive (see the respective chart in the Download Centre). The biggest mismatches are recognizable regarding two protection measures: Firstly, while 37 pS claimed to have State compensation funds, 60 per cent (nine) of 14 responding NGOs reported that this compensation was not available to victims or only available to a few in practice. Secondly, while 31 States reported laws to purge criminal records, only 20 per cent of NGOs (three) confirmed this is available to all or most victims. Furthermore, according to NGOs, foreign nationals, undocumented migrants, and male victims were the most frequently mentioned groups that were being left behind. Here, NGOs mention immense difficulties securing permits due to their immigration status, and a lack of specialized shelters and psychosocial support for male victims. These discrepancies highlight a serious gap between the existence of legal provisions and their practical accessibility for vulnerable groups.

Protections provided for by legislation on cases of trafficking 2026

Chart categories (top to bottom):
- Support provided regardless of co-operation with prosecution
- Full costs of support services for victims to be met by the State
- Free legal aid for victims in seeking civil compensation
- Free legal aid for victims in seeking criminal compensation
- Purge of criminal records for crimes committed as a result of the exploitation
- Compensation for victims from the State
- Compensation for victims through civil proceedings
- Compensation for victims through criminal proceedings
- Audio or video recordings are admissible and can be used as evidence and in court in cases of child victims
- Permitting NGOs to support victims in court hearings
- Access to a cultural mediator
- Access to an interpreter
- Appointment of victim/witness co-ordinator or advisor
- Provision of free legal counselling for victims during criminal proceedings
- Provision of free legal counselling for victims during decision process
- Issuance of work permits to foreign victims
- Issuance of residence permits for foreign victims
- Reflection period

X-axis: 0, 5, 10, 15, 20, 25, 30, 35, 40, 45

Protections provided for by legislation on cases of trafficking 2021

Chart categories (top to bottom):
- Support provided regardless of co-operation with prosecution
- Full costs of support services for victims to be met by the State
- Free legal aid for victims in seeking civil compensation
- Free legal aid for victims in seeking criminal compensation
- Compensation for victims from the State
- Compensation for victims through civil proceedings
- Compensation for victims through criminal proceedings
- Permitting NGOs to support victims in court hearings
- Provision of free legal counselling for victims during criminal proceedings
- Provision of free legal counselling for victims during decision process
- Issuance of work permits to foreign victims
- Issuance of residence permits for foreign victims
- Reflection period

Legend:
- Current
- Planned
- No plans

X-axis: 0, 5, 10, 15, 20, 25, 30, 35, 40, 45

F4: Who informs victims of the services and provisions listed in the preceding tables in the previous question?

The data from 47 responding pS on who informed victims of available services and their rights showed an integrated response setting where specialized victim support services and specialized law enforcement, both dedicated counter-trafficking police and investigators, were named as the primary actors. This suggests that most of the victims receive this information after being put in contact with specialized agencies, while providing such information at the earlier stages – for example, when a non-specialized first line responder identifies initial signs of human trafficking – could increase both victim identification and their trust in support mechanisms. Criminal justice actors, such as prosecutors and judges, but also social welfare agencies, closely followed, which indicates that information was brought to victims both through judicial and social protection channels. General civil society organisations as well as designated NGOs functioned as key intermediaries, while non-specialized police were mentioned among the least relevant informers.

Who informs victims of the services and provisions listed in the preceding tables in the previous question?
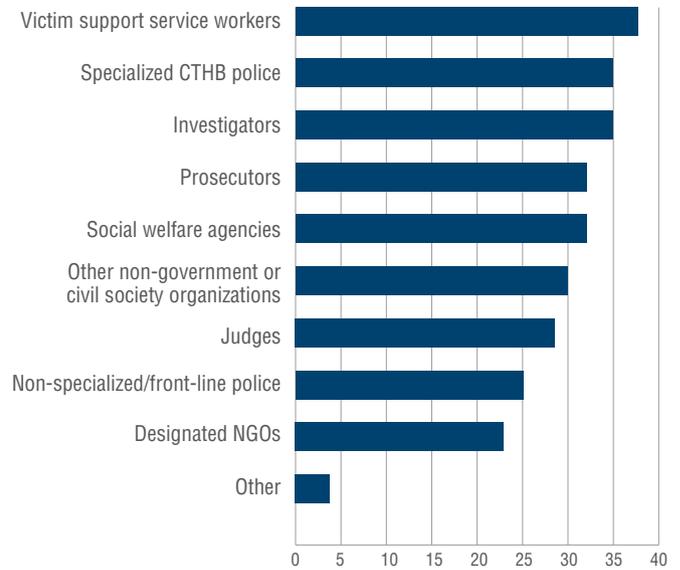
Between 2016 and 2026, there has been a steady for-malization of civil redress mechanisms for national victims of labour exploitation, but data from 46 responding pS also revealed stagnating or even declining trends in the protection of foreign victims. The number of countries that maintain legal provisions for national victims to seek civil redress increased from 39 in 2021 to 44 in 2026; however, access for foreign victims still in-country (36 pS; -3 since 2021) and for those who have already departed (28 pS; -1 since 2021) not only remained considerably lower but even showed a slight downwards trend. A simi-lar development was evident in the numbers for national victims regarding access to labour tribunals (32 pS, +8 since 2021), where access for still in-country foreign vic-tims was reported by 20 States (-1 since 2021) and re-mained restricted to just 14 (-2 pS since 2021) for those who have left the country. The data suggests that foreign victims face increasing difficulties in accessing civil jus-tice, especially after leaving the host country.

The 2021 Survey Report findings already confirmed a systemic deportation barrier, showing that victims were often obliged to leave due to their immigration status before they could access a remedy. This has barely changed since the 2015/16 Survey Report. Regarding government-funded legal services, this was the area with the clearest improvements for all victims: national victims (36 pS, +8 since 2021), still in-country foreign victims (+3 pS since 2021), and foreign victims who already left the country (+4 pS). Taking into account question F3, there is a contrast between the number of pS that have the legal capacity to provide compensation and those that have responded on successful payouts in practice. While 39 pS and 38 pS, respectively, have provisions for com-pensation through criminal and civil proceedings, only 24 pS provided information on compensation payments to victims of trafficking for labour exploitation for unpaid wages. There were approximately 15 to 20 notable in-stances across only about ten pS where specific amounts were confirmed as awarded or paid to both adult and minor victims of trafficking for labour exploitation. Their scale ranged from EUR 460 to EUR 202,000 per victim (amounts converted to euros). The courts in pS predomi-nantly awarded compensation for non-material damage and damage to health. Ultimately, this data underscores the fact that while legal aid has improved, the practical implementation of redress lags, and a systemic barrier of deportation remains a primary obstacle to achieving civil redress for foreign survivors.

Civil redress for victims of trafficking for labour exploitation 2016-2026

Legend: 2026, 2021, 2016

X-axis groups:
- Legal provision for victims to seek civil redress: Available to national victims / Available to foreign victims (still in country) / Available to foreign victims (already left country)
- Labour tribunals that provide access to remedies to victims: Available to national victims / Available to foreign victims (still in country) / Available to foreign victims (already left country)
- Government funded legal services to support victims to seek civil redress: Available to national victims / Available to foreign victims (still in country) / Available to foreign victims (already left country)

Fifty pS responded to the question on procedures to protect witnesses and victims in relation to court proceedings. Of these, 44 pS allowed courts to be closed while a victim gives evidence (+5 since 2021); 44 permitted the use of video recordings of statements for children (+6 pS); and 40 provided for the use of video links (+4 pS). The least commonly reported measure was escorting victims to and from their residence for all proceedings (26 pS), a figure that has remained stagnant in count since 2021. Responses suggested a trend toward adopting core provisions such as allowing a support person to sit beside the victim in court (44 pS), a notable rise from the 35 countries reported in 2021. Despite these advancements, data revealed procedural gaps in the physical security of victims. Measures such as secure entrances to court rooms and privacy screens were still reported as less widespread than administrative or legal rights. Additional responses mentioned specific or innovative approaches to victim protection. In one pS, facility

dogs may sit beside victims during testimony to provide comfort and support. Another country reported that legislative provisions permitted the use of voice and image distortion devices, as well as examination behind opaque screens, particularly for the protection of minors. One pS allowed victims to be examined under pseudonyms or to conceal their identities through masks, make-up, or technical voice modulation tools; one country reported that suspects or defendants could be excluded from proceedings when their presence threatened victim safety or caused a negative psychological effect. These findings indicate that pS mostly have expanded procedural rights in court, but the provision of physical security measures has not kept pace.

Procedures to protect witnesses and victims when they go to court 2016-2026
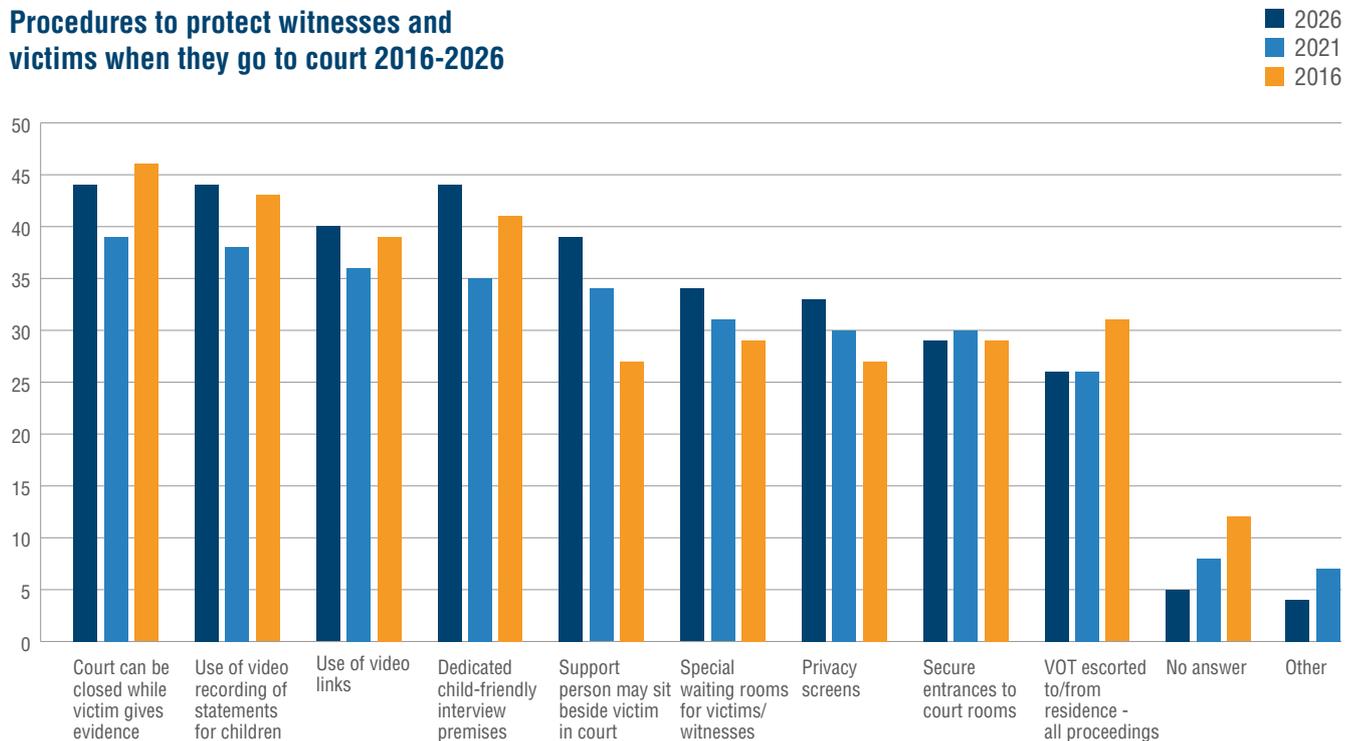
F10: Procedures to protect witnesses
and victims from intimidation/threats
outside court 2021-2026

The comparative data between 2016 and 2026 reveals a concerning stagnation or decline in several key measures aimed at protecting victims and witnesses from intimidation and threats outside the court room. Witness protection remained stable, rising slightly from 41 pS in 2021 to 42 in 2026, though the numbers were still below the peak of 43 pS reported in the 2015/16 survey. Safe houses showed a similar trend. Concerningly, provisions for victim relocation showed a steady downward trend, falling from 39 pS in 2016 to 35 in 2026. Procedures regarding family protection also dropped to its lowest point of 33 pS in 2026, down from 35 in 2016. Bodyguards/security showed the biggest decline and fell from 32 countries in 2021 to only 27 pS. Possible explanations for this downward trend could be resource constraints, as pS have repeatedly highlighted that trafficking investigations are 'difficult and costly.' Measures like bodyguards and relocation require heavy, sustained financial investment, and pS often perceive a 'comparatively low return on investment' when competing with other crime types for limited budgets. NGO feedback indicated that while witness protection formally exists, the thresholds for entry are too high for the average victim. Many were excluded from high-level security because they did not meet strict criteria on evidence or co-operation. Finally, the rise in 'No answer' in 2026 suggested that several countries might have struggled with data collection due to fragmented competencies. The decline in high-intensity protection measures suggests that budget constraints may be undermining the physical safety of victims outside of judicial proceedings.

Procedures to protect witnesses and victims when from intimidation/threats outside court 2016-2026

Legend: 2026, 2021, 2016
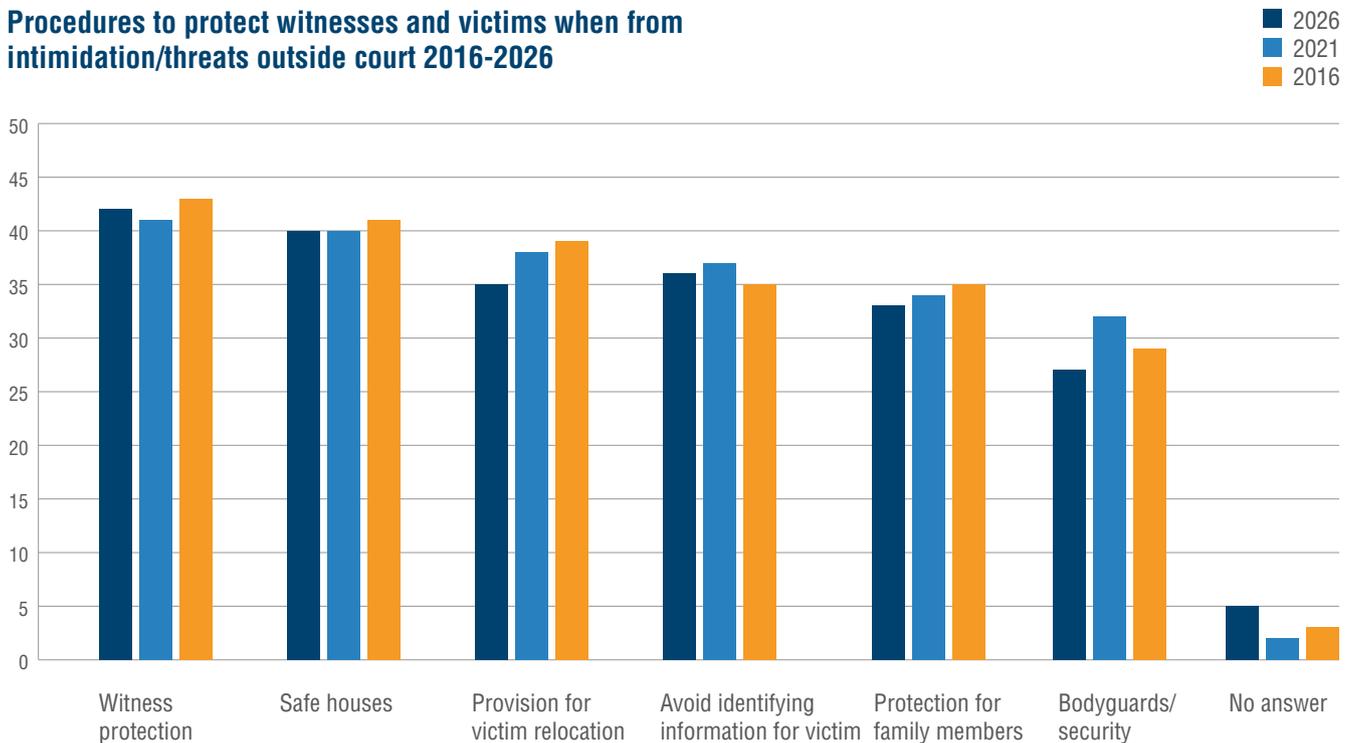
Investigation and prosecution

Section 3 examines the criminal justice response to trafficking in human beings, in particular by focusing on efforts to investigate and prosecute perpetrators while disrupting their financial and technological business models. Sub-section G addresses the effectiveness of law enforcement and judicial actions and provides an overview of investigation trends and the barriers to securing convictions. Sub-sections H and I are closely connected and explore the strategic use of financial investigations. They review the legal frameworks for tracing, freezing, and confiscating assets and the systematization of co-operation with the financial sector. Sub-section J analyses the intersection of technology and THB, focusing on the development of digital investigative tools and the expansion of liability frameworks for technology companies and Internet Service Providers (ISPs). The overall analysis indicates a strategic shift toward systematizing financial and technological responses across the OSCE region. However, this progress seems frequently to be undermined by a widening 'digital divide' between law enforcement and human traffickers and persistent resource constraints in pS.

G Investigation, law enforcement and prosecution

Analysis of Results Summary

In the sphere of investigation, law enforcement, and prosecution, the analysis shows that pS increasingly relied on non-trafficking statutes, such as money laundering, pimping, and narcotics distribution, to secure convictions when specific THB thresholds were difficult to meet. While the collection of sex-disaggregated data on perpetrators became standard, a significant gap remained in targeting high-level actors within organized criminal networks, as many investigations focused on low-level recruiters. The primary barrier to effective prosecution continued to be the reliance on victim testimony, with 60 per cent of responding pS reporting victims' unwillingness to co-operate as a major hurdle, often due to fear of retribution or lack of trust in authorities. NGO perspectives highlighted a mismatch, suggesting that while legal frameworks improved, the principle of non-punishment remained largely inaccessible in practice for victims who lacked residence permits or were compelled to commit crimes. This indicates that the regional response must move toward a more proactive, intelligence-led model that reduces the evidentiary burden on victims and identifies victims earlier before they are prosecuted for criminal acts they were compelled to commit as a result of trafficking. Focusing more on prosecuting the criminals, rather than victims, would be a more effective use of limited resources and tackle the impunity that high-level actors enjoy when criminal justice is distracted with low-level actors, many of whom may be trafficking victims themselves.

G1: Total numbers of THB investigations 2018-2024

Forty-six States provided information on investigations and prosecutions of human trafficking cases in the period 2021-2024. The chart contains data on the total number of cases under investigation as reported by pS in the years 2018–2024 (the 2020 data set was incomplete). It is critical to note that pS completed question G1 of the survey questionnaire in a highly inconsistent and often incomplete manner, and many only reported the total number without breaking it down into sub-categories of judicial stages. Thus, no valid analysis could be conducted to track cases through the entire criminal justice chain. To provide a coherent overview, the analysis of the 2025/26 survey used additional public sources to supplement the reported data. The analysis of reported investigation figures between 2018 and 2024 reveals a sharp upward trend followed by a period of high-level stabilization. Reported cases increased significantly after the COVID-19 pandemic, which might suggest a surge in law enforcement activity or improved reporting mechanisms, although the lack of detailed data hinders a full assessment of judicial outcomes. The analysis of convictions recorded between 2021 and 2024 demonstrates that pS increasingly use a multi-charge strategy to secure punishments for perpetrators and often rely on non-trafficking statutes, when the specific evidentiary threshold for THB is difficult to meet. The most prevalent additional convictions are related to (1) organized crime participation, (2) offences involving sexual exploitation of children or adults or procuring, and (3) financial and administrative violations, such as money laundering or forgery. Compared to the 2021 Survey Re-

port, where 27 pS reported collecting data on THB crimes prosecuted under non-trafficking legislation, the 2026 data shows a broader range of applied statutes, as well as persistent gaps in information-gathering, as such information was not tracked centrally or remained siloed within specific judicial departments. Furthermore, nearly 60 per cent of pS admitted they did not systematically collect data on whether investigations were re-qualified as other crimes or did not answer the question; an equal number of pS did not track the specific roles of perpetrators (e.g. recruiter vs exploiter) (see respective charts in the Download Centre).

Total number of THB investigations 2018-2024
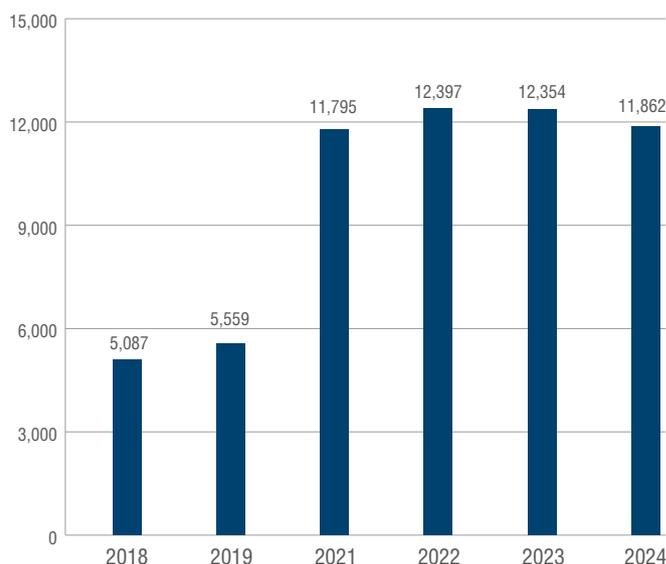
Forty-eight countries presented information on the barriers and challenges to the effective investigation and prosecution of THB cases. These responses highlighted a range of critical issues, which most commonly related to (1) victim co-operation with law enforcement, (2) a persistent lack of evidence beyond victim testimony, and (3) the physical absence of witnesses due to deportation or repatriation. These responses should be read alongside the CSO experiences and insights, which indicated that many survivors avoided engaging with law enforcement due to low trust and fear of immigration consequences (see chart 'NGO perspectives on the identification of trafficking victims' in section 2/ Prompt and accurate identification of victims).

Further, pS reported that investigation and prosecution efforts were often hampered by insufficient staff (16 pS) and a lack of prioritization (12 pS). States also identified a significant digital divide, noting that insufficient understanding of THB (18 pS) and insufficient technological solutions (13 pS) prevented them from keeping pace with organized criminal groups. Traffickers increasingly used social media, encrypted messaging apps, and online platforms for recruitment and exploitation, whilst law enforcement lacked tools for artificial intelligence, big data analysis, and cybercrime monitoring. Co-operation with international digital platforms remained slow and hindered digital evidence collection and victim location efforts. In connection to this, States reported difficulties with financial investigations, as traffickers concealed assets through third parties or moved them offshore. Authorities lacked cryptocurrency tracking capabilities, financial investigation specialists, and effective inter-institutional co-operation between police, prosecutors, and financial institutions. One State reported anti-mafia asset seizure laws were applied irregularly and no mechanisms existed to use confiscated assets for victim compensation. Other reported challenges included ineffective international co-operation (12 pS), often due to slow legal assistance processes, and inefficient co-operation between different law enforcement units (six pS) or national justice bodies (five pS). A smaller number of countries also reported other barriers and challenges, such as a lack of support from stakeholders outside the criminal justice system, insufficient case management systems, legislation, and a lack of research on the national modus operandi of traffickers. The growing technological gap between traffickers and law enforcement, combined with the lack of financial investigation expertise, poses a severe risk to the successful prosecution of transnational organized crime networks.

Barriers/challenges to effective investigation and prosecution of human traffickers and THB networks

H Targeting the assets of traffickers

Analysis of Results Summary

Regarding the targeting of traffickers' assets, there was a broad regional commitment to identifying THB as a predicate offence for money laundering. Most pS established laws for the tracing, freezing, and confiscation of proceeds, with freezing orders most commonly issued during the pre-court or prosecution stages. However, a significant portion of confiscated assets continued to be returned to general State funds rather than being prioritized for victim compensation or reinvested into THB investigative units. NGOs reported that State compensation remained a 'postcode lottery,' with many victims unable to access funds due to complex eligibility requirements and their immigration status. The findings suggest that while the legal tools for asset recovery are largely in place, their practical application for the benefit of survivors remains very limited and deprioritized.

H1: THB as a predicate offence for money laundering 2021-2026

In 2026, 41 pS confirmed they had provisions of human trafficking as a predicate offence for money laundering in place, with one State stating that it is in the process of introducing such provisions and six pS stating they have not. The comparison between the 2021 and 2025/26 Survey data indicates a gradual increase in the formalization of trafficking in human beings as a predicate offence for money laundering across the OSCE region. The number of pS that responded affirmatively increased from 38 in 2021 (+3 pS), which suggests a consistent movement towards strengthening financial investigation frameworks. A small but growing number of States explicitly reported a lack of such provisions, while the number of pS in the process of making THB a predicate offence decreased by one. This divergence likely reflects a combination of legislative updates in some countries and more comprehensive reporting from a larger number of pS. Overall, the widening legal recognition of trafficking as a predicate offence indicates a strategic expansion of integrating anti-money laundering tools into the core criminal justice response to human trafficking.

THB as predicate offence for money laundering 2021-2026
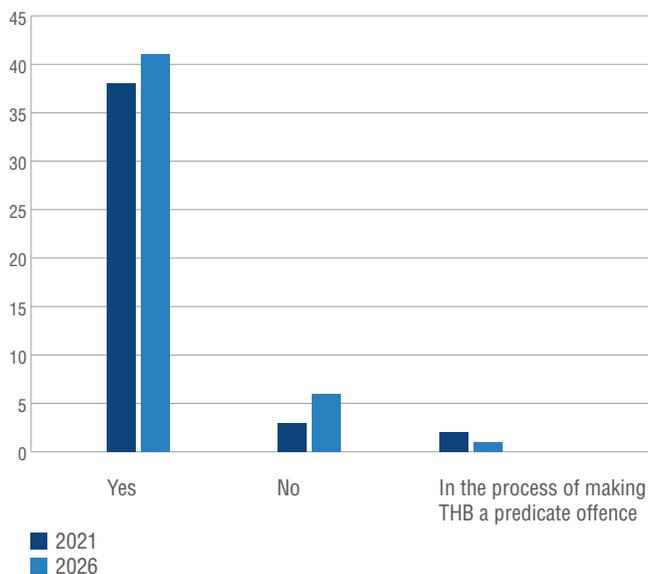
H2: Legal provisions for freezing and confiscating THB proceeds 2021-2026

The 2025/26 survey analysis reveals that the vast majority of States has established robust legal foundations for asset recovery, with 44 pS reporting current laws and bylaws for the tracing, freezing, and confiscating of THB proceeds. This indicates a high level of regional commitment to disrupting the financial incentives of trafficking, with only two pS reporting no such provisions and another two stating that measures are in development. Looking at changes since the 2021 Survey Report, findings show that legal frameworks for the seizure of criminal proceeds remained a cornerstone of the response to human trafficking. In 2021, 94 per cent of pS (52 pS) had laws in place for the tracing, freezing, and confiscating of THB proceeds, and by 2026, this figure remained largely unchanged (92 per cent of the respondents). Additional information provided by pS suggests a trend towards modernizing and tailoring these financial instruments to keep pace with evolving criminal tactics. For instance, one pS updated its framework recently to allow for the confiscation of material benefits starting from a threshold of EUR 5,000. Other countries highlighted that while they relied on established criminal codes, their authorities increasingly used financial investigation protocols to secure proceeds specifically derived from exploitation.
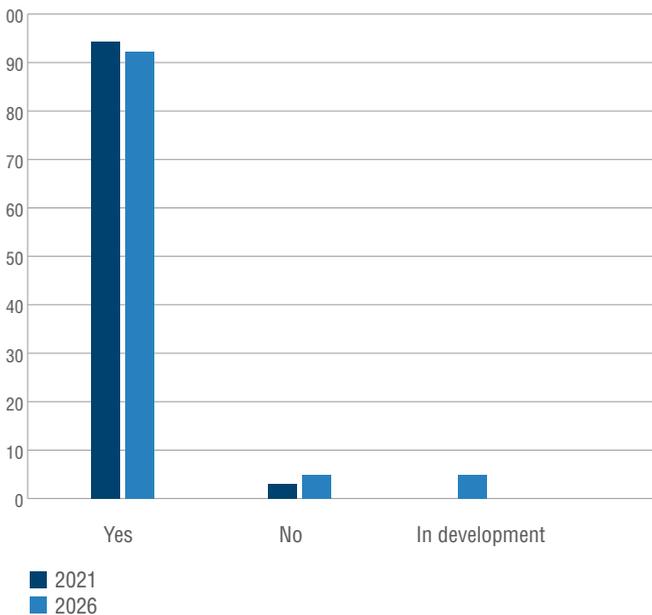
H3: Stage of the criminal proceedings when freezing orders in THB cases are issued

The question about when freezing orders are issued in human trafficking cases was newly added to the 2025/26 Survey and was responded to by 48 pS. The timing of financial interventions became more strategically co-ordinated, with States reporting that freezing orders are now typically issued during both the pre-court investigation (34 pS) and the prosecution stages (31 pS). This represents a proactive shift toward securing assets at the earliest possible point to prevent perpetrators from laundering or transferring illicit funds before the judicial proceedings conclude. The replies further showed that adjudication in the court of first instance remained a significant point for asset intervention (20 pS), while 18 pS reported that orders could be issued as early as the initial detection of the crime. Eighteen pS utilized freezing orders during additional in-court investigations. Ten pS reported the use of freezing orders in civil law proceedings following criminal trials, which suggests that civil recovery routes remain secondary to criminal asset-seizure mechanisms. Only one country explicitly stated that it does not issue freezing orders, while four pS did not respond to this specific question. The increasing use of freezing orders during the earliest phases of detection and investigation indicates a growing recognition across pS that immediate financial intervention is of essence for the effective disruption of trafficking networks and before criminals move or hide their assets.

Legal provisions for freezing and confiscating THB proceeds 2021-2026

- 2021
- 2026

Stage of the criminal proceedings when freezing orders in THB cases are issued

- Pre-court investigation
- Prosecution
- Adjudication in-court of 1st instance
- Detection
- Additional in-court investigations
- In civil law proceedings following criminal proceedings
- No answer
- No, my country does not issue freezing orders

Forty-three pS specified how confiscated assets were used according to the law. Only 21 pS provided data on the actual purposes for which assets were used. Legally, the mandate to return confiscated assets to the State's general fund decreased from 85 per cent in 2021 (44 pS) to 79 per cent by 2026 (34 pS). In contrast, States increased their actual practice of returning funds to the general budget from 68 per cent (13 pS) to 86 per cent (18 pS), which demonstrates that administrative reliance on general funds had outstripped the pace of legislative reform. Legal provisions for compensating victims remained stable at 58 per cent (25 pS, -5 pS since 2021) but showed a downward trend in successful implementation from 63 per cent in 2021 (12 pS) to 52 per cent in 2026 (11 pS). Although States increased the legal formalization of victim support funds from 15 per cent (eight pS)

to 23 per cent (ten pS), only ten per cent of respondents did so in practice (two pS, -1 per cent since 2021). Positively, laws to fund other anti-THB activities increased from ten per cent (five pS) to 16 per cent (seven pS), and so did provisions to support investigating units (14 per cent, +4 per cent since 2021). Their implementation, however, remained in a negligible five per cent application rate or even decreased. The findings suggest that whilst States had modernized legal frameworks to include more diverse usage categories, they failed to translate these reforms into practical redistribution of assets toward victim-centred outcomes and operational support. This means that the transition from a formal right to an accessible remedy remains a major barrier for victims and survivors.

Use of confiscated assets by law/in practice 2021-2026

Legend:
- 2026: Yes, and according to the law, the confiscated assets are used to …
- 2026: Yes, and in the past four years the State has used the confiscated assets to …
- 2021: Yes, and according to the law, the confiscated assets are used to …
- 2021: Yes, and in the past four years the State has used the confiscated assets to …

Categories: Return to the State's general fund | Compensate victims | Fund victim support activities | Fund other anti-THB activities | Support work of the responsible investigating unit

Financial investigations

Analysis of results summary

In the realm of financial investigations, the use of 'red flag' indicators to trigger suspicious transaction reports (STRs) grew, which points toward an increased co-operation between law enforcement and the financial sector. Training for THB specialists on investigating criminal assets expanded, yet specialized training for external actors, such as money transmitters and internet service providers, stagnated. Although at least ten pS launched investigations based on STRs, many reported that they lacked the capacity to analyse complex financial data effectively. This indicates that the 'follow the money' strategy is being standardized in policy but remains under-utilized as a primary investigative tool.

I5: Red flag indicators that trigger suspicious transaction reports include indicators relating to THB/labour exploitation 2016-2026

Effectively disrupting traffickers' financial flows relies on detecting irregular activity within financial networks. To facilitate this, financial institutions employ specific 'red flag' indicators to identify questionable transactions, which are subsequently shared with competent authorities through formalized suspicious transaction reports. The analysis of the question about whether red flag indicators can trigger suspicious transaction reports regarding trafficking and labour exploitation reveals a noteworthy fluctuation in the commitment of States to use these financial tools between 2016 and 2026. Previous figures showed a period of steady progress, which can be interpreted as a broad regional movement toward formalizing financial investigation frameworks to target the proceeds of crime. However, the 2025/26 replies reveal a substantial regression. The number of pS that reported the use of these indicators dropped to 22, which was three States fewer than the 2016 baseline. While the number of negative responses remained relatively stable at ten pS in both 2021 and 2026, the continued presence of eight 'No answer' responses may point to fragmented competencies and difficulties in data collection across different judicial and financial departments. The decline in the reported use of financial red flags suggests a potential loss of momentum in tracking illicit assets.

Red flag indicators that trigger suspicious transaction reports include indicators relating to THB/labour exploitation 2016-2026

Legend: Yes, No, No answer
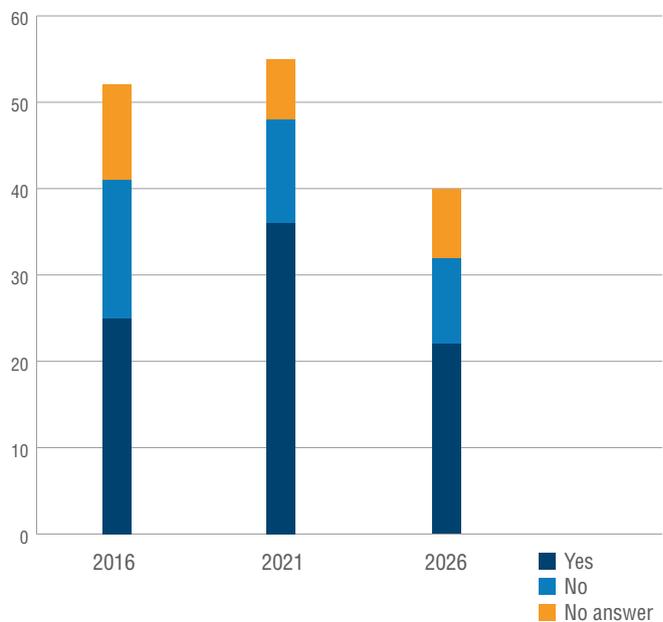
Thirty-five countries provided information on the types of financial investigation training provided. Their answers indicate progress in strengthening financial investigations to combat human trafficking through training for general financial investigation staff, where numbers increased steadily from 15 pS in 2016 to now 22 pS. The involvement of the private sector, for example, through training for money transfer services to identify suspicious financial flows, also increased to 15 pS between 2021 and 2026, following a decline in 2021. Some States reported having established standardized annual programmes, and several countries adopted digital training and online simulations since the COVID-19 pandemic. Despite these successes, the analysis highlights remaining challenges: the number of pS that trained specialized THB units in asset recovery fell slightly from a peak in 2021 (28 pS) to 26 pS. Of concern is also the increase in the number of pS that reported not conducting any such training, from five to nine pS. In addition, the frequency of training remained very diverse across pS. The decrease in training for specialized units, and the rise in States offering no training at all highlights a growing disparity in the technical capacity of pS to conduct complex financial investigations.

Types of financial investigation training provided 2016-2026

Training for THB investigation specialists (for example, members of a specialist anti-THB unit) on how to investigate criminal assets

Training for financial investigation staff on how to investigate THB offences

Training for money transmitters and other money service businesses on how to identify and report financial flows that may be related to THB

- 2016
- 2021
- 2026

J | Technology and trafficking

Analysis of Results Summary

The analysis of technology and trafficking reveals that pS transitioned toward digital capacity-building, particularly for cybercrime and anti-trafficking officers. However, a conspicuous gap emerged between the agility of traffickers and the State response; for many pS, the transition from reactive content removal to proactive digital monitoring has come to a standstill. There was a visible decline in the use of active tools such as web-scraping and the maintenance of national hotlines for child exploitation, which suggests a deprioritization of essential digital tools and infrastructure around child protection from trafficking and exploitation. Furthermore, while more pS introduced policies to hold technology companies and ISPs criminally or financially liable, the practical execution of online undercover operations decreased, possibly due to legal restrictions and high investigative costs. The findings suggest that the future success of anti-trafficking efforts depends on pS bridging the 'digital divide' through co-ordinated resource allocation and the systematization of proactive digital safeguards.

J1: Training curriculum of the police/law enforcement or judicial academies in your country including training on how to address technology-facilitated/enabled trafficking 2021-2026

The analysis of training efforts to address technology-facilitated/enabled human trafficking between 2021 and 2026 highlights an intensification of capacity-building in pS. It must be remarked that due to a more detailed subdivision of law enforcement categories in the 2025/26 questionnaire, 'Anti-THB officers' and 'Investigators' were consolidated for the analysis into the broader category of law enforcement (LE) officials. This adjustment resulted in all 47 responding States reporting active training, compared to 28 pS (65 per cent) in 2021. Furthermore, the focus on digital investigative skills grew notably, as training for cybercrime officers increased by ten pS to 28 pS (60 per cent), while programmes for organized crime specialists went up to 36 per cent (+7 pS). That suggests States are placing a priority on training the actors who directly gather digital evidence, run online investigations, and disrupt offender networks. This is consistent with the acknowledgment that traffickers increasingly use online platforms and digital tools, requiring frontline investigators to have specialized technical skills. Only modest development can be observed in the judicial sector, where training for both judges and prosecutors has not significantly expanded, with only ten and 18 pS reporting it, respectively. Beyond statistical growth, the replies indicate a shift toward standardizing content and increasing training frequency, with many countries having established annual training cycles. A visible regional trend is the transition to online and simulation-based formats, a result of the COVID-19 pandemic. The systematic expansion of digital training for law enforcement suggests a commitment to professionalizing the response to trafficking through information and communication technologies (ICTs), even as the judicial sector lags behind.

Training curriculum of the police/law enforcement or judicial academies in your country including training on how to address technology facilitated/enabled trafficking
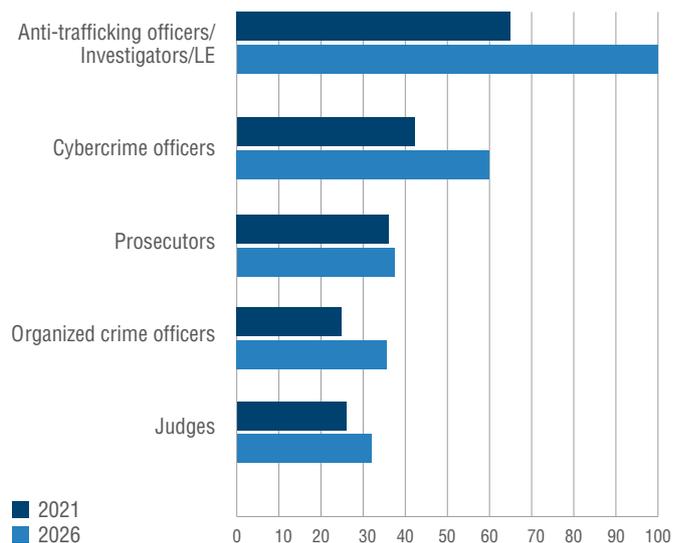
2021
2026

As traffickers became increasingly sophisticated in their use of technological tools, a comparison of standard operating procedures (SOPs) or guidance to counter ICT-facilitated trafficking between 2021 and 2026 revealed a conspicuous gap between the evolving threat and the regional responses. Despite the rapid digital transformation of criminal activities, the percentage increases across most survey categories were remarkably small, suggesting that national responses did not keep pace with the agility of criminals in the digital sphere. The application of 'specific indicators of possible THB cases on online platforms' increased only marginally by six pS to 45 per cent (21 pS) in 2026. A similar modest increase by five pS was reported in efforts to map high-risk online platforms, to 38 per cent (18 pS) over the five-year period. This slow growth suggests that, while some States apply digital red flags to trigger investigations earlier in the trafficking cycle, the transition from reactive to proactive digital monitoring has stagnated for the majority of countries. The 'use of specific technological tools to fight THB' saw the most notable growth from 12 pS (34 per cent) to 21 pS (45 per cent); however, it still involved fewer than half of the responding pS. The biggest decline is visible in the number of pS conducting undercover operations online. While the raw number of pS rose from 16 to 18, the percentage of the total responding pS dropped from 46 per cent to 38 per cent. Fourteen pS (30 per cent) explicitly stated they do not employ any of these technological measures. Several factors may explain this trend: States increasingly favour automated detection over resource-intensive human-led operations, while cross-border challenges and legal restrictions further limit implementation. Overall, despite some progress in adopting specialized tools and indicators, law enforcement efforts are not expanding quickly enough to match the pace of technological change in criminal operations.

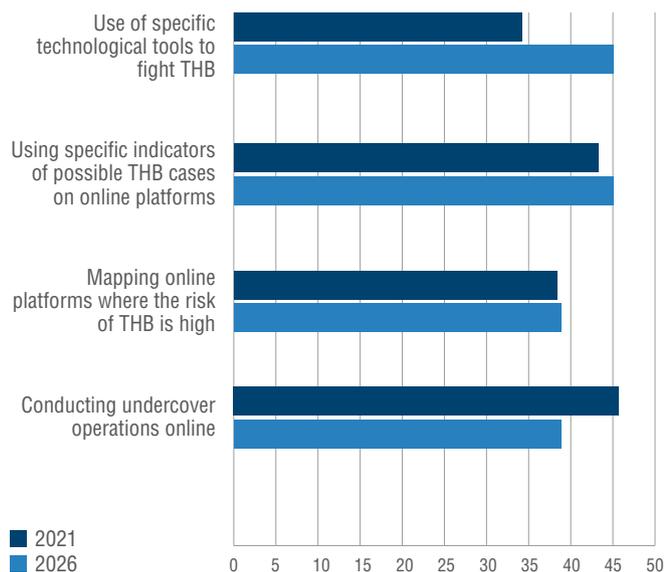**SOPs or other guidance on proactive monitoring, detecting, investigating, and disrupting ICT-facilitated THB 2021-2026**

The analysis of the adoption of policies on technology and trafficking in human beings reveals an overall intensification of regulatory frameworks in pS and a clear upward trend in the formalization of duties for the private sector between 2021 and 2026. The dataset provides seven directly comparable categories between the two surveys. Of 40 responding States, 21 noted a requirement for technology companies and ISPs to report trafficking cases taking place on their platforms (+7 pS). The largest increase was visible in the area of legal deterrence; the number of pS that made technology companies and ISPs criminally and financially liable for knowingly assisting or supporting trafficking more than doubled, from seven pS to 18 pS. In contrast, proactive and preventive measures grew more modestly. Policies regarding the removal of material potentially luring individuals into trafficking increased from 12 to 14 pS, while requirements for companies to proactively identify THB cases expanded from eight to ten pS. The use of AI-collected data as evidence in court remained the least common policy, although it saw a marginal increase from seven to nine pS. The number of States reporting not to apply any of these policies declined slightly to eight, while seven pS reported to have other policies (+6 pS). This indicates that several countries are realizing niche or country-specific technological responses that are not captured by the standard categories. The findings suggest that reporting duties and liability frameworks for the private sector are expanding, but at the same time governments remain hesitant to mandate proactive and more sophisticated measures.

Adoption of policies on technology and THB 2021-2026

Legend:
- 2021
- 2026

Among the 41 pS that reported on technology-related
THB, the use of web-scraping of high-risk platforms fell
sharply from 24 to 15 pS, whilst measures to restrict
high-risk platforms also declined from 12 to ten pS. This
likely reflects the displacement effect, where traffickers
quickly replace restricted venues, making reactive take-
downs a less sustainable strategy. The use of standard-
ized indicators to flag online THB cases rose modestly
from 19 to 22 pS. Hotlines for online child sexual ex-
ploitation, whilst remaining the most reported measure,
decreased notably from 39 to 29 pS. Several factors
may explain these trends: de-prioritization of practical
infrastructure for combating child trafficking; shrinking
civil society spaces and funding diversion towards other
crimes, such as domestic violence, across the OSCE
region; or shifting policy priorities away from technology-
based anti-THB measures. While greater standardization
of indicators suggests professionalization, the declining
use of active tools like web-scraping and hotlines, along
with the private sector's reduced involvement in formal
task forces, indicates that national responses fail to
keep pace with the digital evolution of criminal networks.

Measures regarding technology and human trafficking 2021-2026

Legend:
■ 2021
■ 2026

Categories:
- A national hotline to report on online child sexual abuse and exploitation
- Generic and specific indicators to flag possible THB cases facilitated by online platforms
- Web scraping to automatically collect data from websites/online platforms at risk to be THB related
- Shut down or limit access to websites and online platforms advertising illegal services with high risk of THB
- A task force/working group to address technology-facilitated THB
- Technology companies and/or ISPs participate in the task force/working group

The following recommendations address the identified implementation gaps between legal frameworks and practical results. Governments are encouraged to move beyond policy adoption towards resource-backed enforcement and survivor-informed justice.

RECOMMEN-DATIONS

Recommendations A
Identifying and addressing trafficking for labour exploitation

Updated Recommendation 1:
Strengthened supply chain governance and procurement enforcement

Governments are encouraged to build on progress made in strengthening public procurement, supply chain governance, due diligence, and monitoring requirements to minimize the risk of purchasing goods and services produced by forced labour. This includes ensuring sufficient resources are allocated to risk assessment and contract monitoring, establishing dedicated enforcement bodies, implementing mandatory exclusion mechanisms for non-compliant contractors, and closing the implementation gap between formal regulation and effective oversight.

New Recommendation 2:
Worker empowerment through mobility and transparency

Governments are encouraged to expand measures empowering migrant workers through enhanced mobility rights and transparency protections. This includes allowing workers to change employers without requiring new visas or work permits (or leaving the country), mandating written employment contracts in languages workers understand, providing pre-departure orientation training on rights and risks, implementing stronger regulation and oversight of recruitment agencies, and ensuring these measures apply equally to foreign nationals and nationals working abroad. To effectively deter human trafficking, occupational safety authorities, labour inspectorates, and other relevant stakeholders should prioritize protecting workers' rights.

Updated Recommendation 3:
Zero recruitment fees and debt bondage prevention

To promote ethical recruitment and prevent debt bondage, governments are encouraged to adopt and enforce no-fees-to-workers provisions in labour recruitment regulations. Where such provisions exist, States should evaluate implementation for loopholes allowing fee recovery through alternative means, accelerate adoption beyond current levels, ensure employer-borne costs are clearly stipulated and monitored, and address the slowdown in adoption of worker-paid fee prohibitions since 2021.

Updated Recommendation 4:
Mandatory corporate due diligence and supply chain accountability

Governments are encouraged to adopt binding legislation requiring companies to identify, prevent, mitigate, and remediate instances and risks of forced labour and human trafficking in their supply chains, consistent with the UN Guiding Principles on Business and Human Rights. States should accelerate legislative adoption to close the implementation gap, establish National Contact Points and specialized enforcement bodies, move beyond voluntary frameworks toward mandatory compliance with effective penalties, and ensure adequate training and guidance for contracting authorities.

New Recommendation 5:
Private sector engagement and multi-stakeholder co-ordination

Governments are encouraged to continue and expand measures encouraging private sector action against human trafficking through prevention campaigns, capacity-building, practical guidelines and information tools, knowledge exchange platforms, and multi-stakeholder initiatives. States should develop innovative support mechanisms, including legal and financial consulting hubs, sector-specific training modules, and collaborative frameworks involving labour inspectorates, anti-trafficking units, and civil society organizations.

Recommendations B
Measures to combat child trafficking

New Recommendation 1:
Renewed prioritization of addressing child trafficking

Governments are encouraged to increase implementation of practical measures to combat child trafficking through targeted resource allocation and renewed policy commitment, in particular regarding child-friendly accommodation, specialized police training, birth registration campaigns, best-interests guidance, and gender- or minority-specific support services.

Updated Recommendation 2:
Strengthen legal frameworks in tourism and sexual exploitation

Governments are encouraged to strengthen protections in travel and tourism by enacting extra-territorial legislation and implementing training for tourism professionals, mandatory child protection standards for hospitality businesses, and strengthened cross-border co-operation mechanisms. Also, governments are strongly encouraged to amend legal frameworks to ensure the criminalization of sexual activities with a minor regardless of the buyer's knowledge of the child's age.

New Recommendation 3:
Transition from reactive to proactive digital safeguards

Governments are urged to adopt legal and policy approaches that obligate businesses to implement robust measures that guarantee online safety for children, i.e. moderation, supervision and removal of harmful and illicit content, safety by design including mandatory age verification of both content creators and viewers, and reporting and referral channels to prevent, identify, and protect children from online grooming and online child sexual abuse and exploitation.

Updated Recommendation 4:
Comprehensive child protection frameworks for all vulnerable children

Governments are urged to ensure that efforts to prevent and respond to child trafficking are embedded within comprehensive, adequately resourced child protection frameworks. This includes: (1) guaranteeing that children's access to rights under the UN Convention on the Rights of the Child is not contingent on formal trafficking victim identification; (2) ensuring universal access to education and healthcare for all vulnerable children, particularly those belonging to minority groups and marginalized populations, children in institutions, children in street situations or homeless, children with disabilities, displaced or unaccompanied children; (3) addressing the gaps regarding child-friendly accommodation, care leavers, children without citizenship/birth registration, and homeless youth; and (4) ensuring that statutory child protection agencies are mandated and trained to address child trafficking cases.

Updated Recommendation 5:
Safeguard guardianship and trauma-informed support

Governments are encouraged to enhance their efforts to identify and provide comprehensive assistance to unaccompanied and separated children in line with their rights under the CRC. This includes: (1) ensuring all accompanied children have legal guardians; (2) strengthening child-specific provisions within National Referral Mechanisms in line with the 'best interests of the child' principle; and (3) ensuring adequate funding and specialized training for guardians as legal representatives who are trained in trauma-informed and age-appropriate assistance throughout all legal and aftercare processes.

New Recommendation 6:
National Focal Points and cross-border co-ordination

Governments are encouraged to establish or strengthen National Focal Points for child victims of trafficking and formalized protocols for regular cross-border communication. These mechanisms are essential for rapid information exchange, co-ordinated protection measures, and ensuring continuity of care for children in cross-border trafficking situations.

Recommendations C
General and targeted prevention and capacity-building

Updated Recommendation 1:
Strengthen demand-side interventions

Governments are urged to strengthen legislative frameworks addressing demand for sexual services that facilitates and fuels exploitation by prioritizing the adoption of strict liability provisions that criminalize the use of services from trafficking victims regardless of buyer knowledge. This must be complemented by robust 'upstream' prevention programming, including mandatory awareness and educational activities specifically targeting men and boys, sex buyers, and tourists in high-risk contexts. States should develop targeted deterrence interventions at major sporting events and tourist destinations, as well as online, moving beyond general public campaigns towards evidence-based behavioural change initiatives that address harmful attitudes contributing to exploitation.

Updated Recommendation 2:
Measure impact and evidence-based prevention

Supporting the recommendations of the 24th Alliance against Trafficking in Persons Conference "Beyond Awareness-Raising: Reshaping Human Trafficking Prevention," governments are urged to shape impact-driven prevention policies and practices aimed at empowering vulnerable groups, fostering co-operation to tackle emerging trafficking forms, and building resilience.

States should assess campaigns more robustly and base prevention on systematically gathered evidence, systematically measure awareness levels among the general population, integrate evaluation frameworks into all prevention campaigns to assess behavioural outcomes beyond reach metrics, and build on the positive trend of incorporating public opinion surveys by establishing standardized measurement protocols that capture changes in knowledge, attitudes, and reporting behaviours. Prevention strategies must be grounded in research and victim/survivor feedback, for instance, with national rapporteurs or equivalent mechanisms tasked with systematically gathering and analysing this information. To this end, pS should establish formal feedback structures, including for example, advisory councils, safeguards, and data protection protocols, to reduce reliance on ad hoc inputs.

Updated Recommendation 3:
Training with comprehensive coverage

Governments are encouraged to address training deficiencies by prioritizing THB-specific capacity-building for education authorities, teachers, service providers for persons with disabilities, labour inspectors, staff in the hospitality industry, sports association personnel, child protection authorities, and trade union representatives, amongst others. Whilst maintaining the strong training access achieved for law enforcement and judicial actors, States should leverage online training platforms and e-learning tools to extend systematic coverage to the above-listed underserved sectors. Training must be mandatory, recurring throughout professional careers, and increasingly multi-disciplinary, incorporating trauma-informed and survivor-informed methodologies as standard practice. Governments should ensure that training programmes integrate emerging technologies, including OSINT techniques, to prepare first line responders where appropriate for complex operational scenarios whilst maintaining focus on victim-centred approaches that prevent re-traumatization.

New Recommendation 4:
Address structural vulnerabilities

Governments are urged to balance direct support services with longer-term structural interventions by investing in affordable housing, mobility infrastructure, and strengthened access to education alongside existing social assistance and economic empowerment programmes. Prevention strategies must ensure inclusion of all vulnerable populations identified by States, including Roma and Traveller communities, children in institutional care and care leavers, LGBTIQ+ individuals, persons with substance abuse, and temporarily displaced or homeless persons, with tailored programmes addressing their specific vulnerabilities and barriers to protection.

Recommendations D
Prompt and accurate identification of victims

Updated Recommendation 1:
Integrated and disaggregated data collection

Governments are encouraged to establish unified national data collection systems that integrate information from law enforcement, social services, healthcare providers, and civil society organizations, to disaggregate data to include gender, ethnicity, age, disability status, and exploitation type and to systematically analyse identification points to determine where victims might have been identified earlier in their trafficking experience.

Updated Recommendation 2:
Systematic screening in detention and reception facilities

Governments are encouraged to increase screening within immigration detention and penitentiary facilities by ensuring systematic trafficking assessments for all detained individuals, including those in accelerated procedures, conducted by trained specialists using trauma-informed approaches, whilst maintaining specialized non-governmental organization access to migrant reception, border, transit, detention, and penitentiary facilities for identification purposes. Such identification should be followed by the provision of comprehensive assistance to victim of human trafficking, including in cases where human trafficking and exploitation occurred in other countries.

Updated Recommendation 3:
Proactive identification in exploitation settings

Governments are encouraged to strengthen proactive identification in high-risk sectors by mandating regular workplace inspections with explicit trafficking identification protocols, extending occupational safety and labour inspectors' and medical professionals' first line responder authority and training, and strengthening co-operation with trade unions through formal protocols for information-sharing and safe reporting channels for workers.

Updated Recommendation 4:
Law enforcement-independent identification pathways

Governments are encouraged to establish and adequately resource identification and referral pathways for presumed victims that operate independently of law enforcement, in line with the OSCE 'social path' approach, through social services, healthcare providers, labour inspectorates, accredited civil society organizations, and teachers. The formal recognition of victim status and the subsequent access to long-term protection and assistance should not be contingent upon a victim's co-operation with law enforcement or the ability to provide evidence for prosecution. This ensures that identification improves in social or humanitarian contexts, thereby addressing documented barriers related to victims' fear of immigration consequences and mistrust of police.

New Recommendation 5:
Enhanced efforts to identify victims of forced criminality

Governments should urgently enhance efforts for early and proactive identification of victims of forced criminality given the rise of cases detected over the last five years and the increasing diversity and complexity of criminal acts trafficking victims are compelled to commit directly related to their trafficking. Efforts should include addressing policy and practical gaps in identification, mapping of at-risk groups and vulnerabilities that criminals target for various types of criminal exploitation, including drug-related crimes, scamming, smuggling, fraud, and violence, and developing indicators for screening among juveniles, youth, and adults being investigated and/or charged with such crimes, defendants, and among prison populations.

New Recommendation 6:
Victim-initiated identification channels

Governments are encouraged to invest systematically in victim-initiated identification channels, including adequately resourced multilingual 24/7 helplines, accessible web-based reporting mechanisms, and self-identification pathways. These systems should be broadly communicated, also with regards to the nature of the services provided by them, and connected directly to comprehensive support services. Furthermore, identification mechanisms at borders and reception centres should prioritize protection procedures over migration control objectives.

Updated Recommendation 7:
Trauma-informed training for frontline actors

Governments are encouraged to implement mandatory, regularly updated training for all frontline actors on trauma-informed identification practices, including specific content on how trauma affects victim behaviour and decision-making, the connections between trafficking and other forms of exploitation, the identification of victims among marginalised populations and unaccompanied minors, and the recognition that apparent 'voluntary' return to exploiters often reflected trauma responses rather than genuine choice.

Updated Recommendation 8:
Enforceable rights to protection

Governments are encouraged to move beyond guidelines-based approaches by establishing legally enforceable victim rights and implementing service quality assurance mechanisms to ensure consistent access to assistance independent of local capacity, funding cycles, or administrative discretion.

Recommendations E
Victim support services

Updated Recommendation 1:
Sustainable funding for long-term reintegration

Governments are encouraged to secure consistent, multi-year funding for long-term recovery beyond the emergency intervention/reflection period phase. This should specifically include financial benefits, professional training, and social assistance to reduce economic vulnerability, bridging the phase before victims and survivors can safely enter the labour market.

Updated Recommendation 2:
Eliminating geographic and linguistic disparities

Governments should decentralize support services to ensure victims in rural areas have the same access to care as those in urban centres. This must be supported by mandated access to professional translation services and cultural mediators to remove barriers for foreign national victims.

New Recommendation 3:
De-linking assistance from legal status and co-operation with prosecution

Governments should ensure that access to residence, shelter, specialized healthcare, psycho-social support, legal aid, education, employment and social benefits is not contingent upon a victim's immigration status or their willingness to co-operate with law enforcement, and covers the entire recovery and (re)integration period based on the individual needs of victims, in line with the OSCE 'social path' approach to protection.

Updated Recommendation 4:
Formalized quality assurance and survivor feedback

Governments are encouraged to move beyond guidelines-based approaches and codify victim rights and remedies in law and implement service quality assurance mechanisms for victim services, requirements for the service providers, and systematic, independent quality-assurance feedback mechanisms for all support providers to ensure consistent access to assistance independent of local capacity, funding cycles, or administrative/agency discretion. This should include formalized survivor-led advisory boards to move beyond ad-hoc feedback and ensure that services are grounded in lived experience.

Updated Recommendation 5:
Expanding needs-based accommodation

Governments are encouraged to prioritize the expansion of specialized housing capacity to address the severe deficit for male victims, boys, and LGBTQ+ individuals. States should ensure that accommodation is not merely available but tailored to the safety and psychological needs of these and other underserved groups and with separate shelter for trafficking victims from victims of other crimes and child-appropriate shelter for child victims.

New Recommendation 6:
Institutional stability and staff retention

Governments are encouraged to address the high staff turnover in the social sector by providing competitive resources, mandatory trauma-informed and burnout prevention training, and institutional support for professionals to maintain continuity of care. Human trafficking training should be included in the educational curricula for future social sector professionals and regular advanced in-service training should be provided periodically.

Recommendations F
Support throughout the criminal justice process

Updated Recommendation 1:
Explicit statutory non-punishment provisions

Governments are encouraged to transition from a reliance on general criminal defences, such as duress or necessity, towards separate, THB-specific legal provisions for non-punishment. Legislative frameworks should ensure a wider scope of the principle that is not limited to certain administrative violations but covers non-exhaustive criminal acts victims were compelled to commit caused by or related to their trafficking situation. The legislation should also include a statutory obligation to pause prosecution pending examination of trafficking identification. Such legal provision should also be complemented by comprehensive guidance embedding the non-punishment principle system-wide and special training for first line officers, investigators, prosecutors, and judges to ensure consistent and correct application of the non-punishment principle for all victims of trafficking.

New Recommendation 2:
Statutory purging of criminal records

Governments are encouraged to establish 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. Such mechanisms must be accessible in practice ensuring that victims are not prevented from obtaining relief due to procedural or evidentiary barriers. Upon the removal of criminal records, victims must be legally regarded as never having been convicted, thereby removing barriers to employment, education, and broader social reintegration. Any administrative fines or financial penalties arising from their trafficking situation should be fully cancelled to alleviate the debt burden on trafficking victims/survivors.

Updated Recommendation 3:
Overcoming barriers to redress

Governments should ensure that the right to civil remedy is not nullified by a victim's immigration status. This includes: (1) suspending deportation orders until all redress proceedings are concluded; (2) granting victims access to labour/compensation tribunals from abroad via technological or legal-aid channels; and (3) resourcing government-funded legal services to represent foreign victims who have already departed.

New Recommendation 4:
Investing in protection outside of the court room

Governments should invest in and strengthen high-intensity physical security measures, such as victim relocation and personal security, outside the court room. Resource allocation should prioritize the long-term safety of victims and their families to ensure effective witness protection.

Updated Recommendation 5:
Increased State compensation

States should undertake a review of their compensation systems to address an apparent mismatch between legislative provision and practical availability. This requires: (1) streamlining application processes for State funds; (2) ensuring that psychological coercion and threats are an eligible category for restitution; (3) guaranteeing that access is not dependent on a victim's continued presence in the country or their willingness to co-operate with prosecution; and (4) increasing use of assets seized from traffickers to provide victims compensation.

Recommendations G
Investigation, law enforcement and prosecution

Updated Recommendation 1:
Implementing victim-centred and
trauma-informed justice

Governments are urged to ensure that criminal justice systems apply victim-centred and trauma-informed approaches in the detection, investigation, and adjudication of THB cases. This includes applying the non-punishment principle and creating mechanisms for criminal record and administrative fine relief for the unlawful activities victims were compelled to commit, as well as providing unconditional access to assistance, regardless of their willingness to co-operate with law enforcement.

Updated Recommendation 2:
Intelligence-led investigations and
reduced testimony reliance

Governments are encouraged to reduce dependence on victim testimony by prioritizing proactive, intelligence-led investigations and advanced techniques, such as financial investigations and the use of new technologies to secure convictions in complex cases where victims are unable or unwilling to testify. This may require increased legal allowance of digital and financial evidence.

Updates Recommendation 3:
Systematic data collection on perpetrator
roles and case outcomes

Governments are encouraged to establish centralized data collection systems that systematically track (1) the specific roles of perpetrators within trafficking operations (recruiters, transporters, exploiters, facilitators), (2) cases where THB investigations were re-qualified as other crimes, and (3) the complete trajectory of cases through the criminal justice system from investigation to final conviction. This data should be disaggregated by sex and citizenship where legally permissible and regularly analysed to inform strategic targeting of high-level actors within organized criminal networks.

Updated Recommendation 4:
Mandatory and multi-disciplinary training

Governments are encouraged to systematize anti-trafficking training by making it mandatory, regular, and integrated into the permanent curricula of judicial, prosecutorial, border guards, and police academies. States should specifically strengthen training efforts in the judicial sector to include the management of electronic and financial evidence, trauma, psychological and debt coercion, and the non-punishment principle. Training must be co-ordinated across sectors to ensure a uniform regional response to evolving trafficking typologies and modi operandi.

Recommendations H and I
Targeting the assets of traffickers and financial investigations

Updated Recommendation 1:
Reinvestment of confiscated assets
for victim redress

Governments are encouraged to consider the better use of confiscated proceeds by making legal provisions for their use in funding victim compensation, support services, and specialized anti-trafficking investigative units to (1) address resource constraints and (2) provide victims with tangible incentives to participate in the justice process.

New Recommendation 2:
Modernization of asset recovery and
freezing mechanisms

Governments are encouraged to update and standardize laws for the tracing and freezing of assets, including the introduction of non-conviction-based confiscation where appropriate. States should ensure that freezing orders can be issued at the earliest possible stage, such as detection or pre-court investigation, to prevent the dissipation of criminal proceeds.

Updated Recommendation 3:
Preventing capacity gaps in specialized training

Governments are encouraged to enhance training for specialized THB units on asset recovery and financial investigations, and establish closer collaboration with financial intelligence and economic crime units. States should establish mandatory, recurring cross-team training programmes with standardized curricula and ensure that both general financial investigators and specialized anti-trafficking units receive regular updates on tracking financial flows related to human trafficking including cryptocurrency tracking, offshore asset concealment, money laundering technique through joint working groups, and inter-institutional co-operation protocols.

Updated Recommendation 4:
Utilizing red flag indicators

Governments are encouraged to establish partnership frameworks that enable structured, secure, and regular information- and data-sharing between competent public authorities and the financial services sector with the purpose of detecting, disrupting, and preventing illicit financial flows related to human trafficking. Such frameworks should support the joint development and regular updating of trafficking-related typologies, as well as sector-specific guidance, including red-flag indicators to assist financial institutions in identifying transactions and patterns associated with trafficking and related high-value financial movements. These mechanisms should be complemented by a requirement for a systematic collection, analysis, and integration of financial intelligence disclosures into national and sectoral risk assessment for a shared and evidence-based understanding of trafficking-related financial risks.

Updated Recommendation 5:
Integration of financial intelligence units (FIUs)

Governments are encouraged to integrate FIUs and financial and economic crime units into the national anti-trafficking response through assigning roles and responsibilities as key stakeholders in national action plans and national anti-trafficking co-ordination mechanisms. These entities should maintain direct operational links with specialized THB units to ensure timely exchange of intelligence and support investigative action. States should provide regular, mandate-specific joint training for anti-trafficking and financial crime/intelligence personnel. Such training should address evolving typologies of exploitation, financial flow patterns, and emerging technologies, enabling authorities to use financial data effectively in criminal investigations and prosecutions.

Recommendations J
Technology and trafficking

Updated Recommendation 1:
Capacity development in the digital sphere

Governments are urged to integrate cyber capabilities within trafficking police squads and prosecutors to scale up investigation of growing patterns of technology-facilitated and -enabled trafficking. States should also provide regular training for criminal justice and judicial actors to master new investigative techniques, including cyber forensics, preservation of digital evidence, open-source investigations, encrypted communications, cybercrime, and cross-border digital investigations. This capacity-building should be regular and reach beyond anti-trafficking experts to include cybercrime and organized crime specialists. States should ensure that police investigators and prosecutors are equipped with the latest technology to counter the agility of traffickers in the cyber sphere, trained to use it, and have sustainable funding for such technological tools.

New Recommendation 2:
Implementing proactive digital and
AI-based tools

Governments are encouraged to complement reactive measures, such as content takedowns from websites, with proactive tools like web-scraping, artificial intelligence, and automated data aggregation to investigate tech-facilitated/enabled THB and to monitor online platforms, social media, and websites associated with high risk of trafficking. States should maintain and resource national hotlines for online exploitation of children and ensure their integration with law enforcement data systems.

Updated Recommendation 3:
Establishing public-private partnerships

Governments are encouraged to enhance efforts to establish and institutionalize public-private partnerships with technology companies and Internet Service Providers through formal engagement in joint task forces or operational protocols. Such partnership should also be used to further incentivize technology companies to co-operate in real-time detection of exploitative content, grooming, and other trafficking-related online activity rather than relying solely on post-hoc reporting and requests for takedowns.

Updated Recommendation 4:
Enhancing corporate liability
and accountability

Governments are urged to adopt criminal, civil, and administrative legislation that holds technology companies and Internet Service Providers liable for failing to detect and prevent and thus facilitating THB. States should mandate that these companies proactively identify and remove exploitative material and report suspicious activities to law enforcement.

Promising practices were selected for each of the sub-sections of the survey to highlight innovative and replicable strategies implemented in pS to translate OSCE anti-trafficking commitments into impactful action. These examples were taken from the text replies participating States provided in their survey responses; the OSCE has not verified the results of these practices.

PROMISING
PRACTICES

A Identifying and addressing trafficking for labour exploitation: The United Kingdom

The United Kingdom demonstrated a robust enforcement model through the Gangmasters and Labour Abuse Authority (GLAA), which successfully transitioned from a regulatory body to one possessing full police powers to investigate serious labour exploitation. By 2026, the GLAA significantly expanded its reach, nearly tripling licensing requirements in high-risk sectors compared to 2016 levels. The authority's mandate encompassed investigating serious cases of labour market abuse, including offences under the national minimum wage, employment agencies, and modern slavery legislation. The GLAA could seek Slavery and Trafficking Risk Orders and Prevention Orders against those suspected or convicted of modern slavery offences. Additionally, the Employment Agency Standards Inspectorate could issue warning letters, prosecute in Magistrates' or Crown Courts with unlimited fines upon conviction, prohibit individuals from running employment agencies for up to ten years, or seek Labour Market Enforcement measures. The GLAA also established bilateral agreements with labour-sending countries, including Kazakhstan and Kyrgyzstan, and had memoranda of understanding in place or under negotiation with main source countries for the UK Seasonal Worker Scheme.

B Measures to combat child trafficking: Greece

Greece established a comprehensive prevention framework that prioritized education and immediate emergency response. So called '21st Century Skills Labs,' for which educational material and activities were developed by national partner NGOs, UNHCR, and academia, were institutionalized nationwide and received the Global Education Award in 2020/2021. These labs provided safe spaces for students to learn experientially about human rights and dignity, incorporating specific curricula such as the 'Human Trafficking Awareness Programme,' and certified over 74,000 teachers by 2026. This initiative was complemented by the National Emergency Response Mechanism (NERM), established in 2021, to provide immediate, trauma-informed accommodation for homeless or precarious unaccompanied children. A significant innovation in 2024 was the launch of the 15107 five-digit hotline, a free-of-charge public service integrated into the NERM to facilitate the rapid identification of children at risk. Additionally, the State conducted experiential workshops for unaccompanied girls to enhance self-esteem and critical thinking against online grooming and the 'loverboy' phenomenon.

C General and targeted prevention: Uzbekistan

Uzbekistan implemented an unprecedented scale of public awareness and cyber-safety campaigns, reaching about 30 million residents through combined offline and digital campaigns. The State-led 'Action Plan 30 Days – Partnership against Trafficking' mobilized territorial commissions and international partners annually around the World Day against Trafficking. Central to this was the use of SMS alerts to mobile subscribers with a warning about the consequences of human trafficking and indicating the hotline number, and the maintenance of the humantraffic.uz portal, which provided legal information in Uzbek, Russian, and English. Capacity-building was manifested through information kiosks at international airports such as Termez and Namangan, which used interactive touch screens to provide pre-exit rights education and details on support services in six destination countries to over 6,000 migrant workers. This high-level awareness was supported by the adoption of 79 new regulatory documents since 2019 by the National Commission to systematize anti-trafficking efforts. Uzbekistan further demonstrated innovation through the launch of the 'salom-migrant' Telegram bot, which offered legal advice to workers abroad, and quarterly meetings of the National Commission to ensure progress across 21 priority 'Road Maps.'

D Prompt and accurate identification of victims: Italy

Italy initiated the 'social path' approach (Article 18 of the Consolidated Immigration Act), which facilitates the formal recognition and assistance of victims independently of their co-operation with the criminal justice system. Victims who participated in protection and social integration programmes were entitled to a special residence permit, which could later be converted into a work or study permit. This approach prioritizes the victim's immediate recovery, which State data suggests ultimately leads to higher-quality evidence for prosecutions. Furthermore, the Government established a special assistance programme that provided presumed victims with a reflection period and access to support services before a formal status determination was finalized. This national network was implemented through 21 regional projects based on public-private partnerships in 2023 as part of an update to the National Referral Mechanism.

E Victim support services: Cyprus

Cyprus formalized a support model where assistance is granted regardless of a victim's immigration status or willingness to testify in court. Victims are entitled to financial, psychological, and social support, which they receive from the Government in co-operation with non-governmental organizations. The Social Welfare Services (SWS) operates a specialized shelter in Nicosia for 15 female victims of sexual exploitation and makes specific arrangements for LGBTI+ individuals to ensure their safety. Although male victims were only provided with temporary accommodation in hostels or state-sponsored houses, the Government offered rent subsidies and access to Guaranteed Minimum Income for those transitioning to private housing. Furthermore, the introduction of standardized referral forms at the Pournara Centre in 2019 improved early detection among vulnerable asylum seekers.

F Support throughout the criminal justice process: USA

In the United States, the 'Continued Presence' mechanism allowed undocumented victims to remain and work in the country for two-year renewable increments during investigations or civil actions. This designation aimed to provide victims with stability and access to federal benefits, and thereby reduced the threat of removal while victims pursued civil or criminal remedies. This tool was aimed to foster trust and stabilize victims, which has led to significant restitution awards, including a case involving 55 agricultural workers who were awarded over EUR 480,000. Furthermore, the US reported that 48 out of 50 state jurisdictions have enacted laws that allowed victims to seek a court order to vacate, expunge, or seal criminal convictions that resulted from unlawful acts they were compelled to commit as a direct result of their exploitation. The US linked this relief to a broader principle of non-punishment.

G Investigation and prosecution: Moldova

Moldova demonstrated high proficiency in complex, transnational investigations conducted through Joint Investigation Teams (JITs). One successful example was the AINTOX operation, which involved co-operation with Romania and France to dismantle a complex labour exploitation network with 119 victims and seize over EUR 1.2 million in assets and 19 luxury vehicles. The State targeted various forms of trafficking, such as a 2023 case involving the exploitation of over 50 Indian and Bangladeshi workers in a tailoring factory. Furthermore, Moldova collaborated with Greek authorities and INTERPOL to dismantle an international network exploited for illegal egg retrieval and surrogacy, involving 30 young female victims from Romania, Moldova, Albania, Bulgaria, and Georgia.

H Targeting the assets of traffickers: France

France effectively utilizes asset-seizure tools to disrupt the financial incentives of trafficking. In one agricultural case, authorities identified 50 victims housed in undignified conditions and seized EUR 215,000 in assets. In another instance involving the kidnapping and exploitation of 15 formerly homeless individuals, the gendarmerie intervened at a container-type accommodation site and seized EUR 150,000. Central to these efforts was the Agency for the Collection and Management of Seized and Confiscated Assets and a specialized fund established in 2016, which used proceeds from confiscated goods to finance anti-trafficking associations and victim compensation, reaching approximately EUR 3.44 million in 2022. This mechanism facilitated the seizure of EUR 14.26 million from trafficking offenders in early 2021 and allowed victims with final court awards to request restitution directly from confiscated assets. Seven compensation claims were submitted by victims in 2021. While the fund supported 24 local and five national projects in 2022, authorities were called upon to further enhance transparency regarding the distribution of funds and the tracking of compensation data.[7] Legislative progress also included the Duty of Vigilance Law, which required parent companies to identify and prevent exploitation in their supply chains. Furthermore, a 2024 order empowered trained labour inspectors to conduct online investigations under pseudonyms to detect illicit recruitment.

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7   Report by the OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings, Valiant Richey, following the country visit to France - 28 June-2 July 2021, https://cthb.osce.org/sites/default/files/f/documents/2/e/529461.pdf, p. 30.

Financial investigations: Switzerland

Switzerland's FIAHT project (Financial Intelligence Against Human Trafficking), launched by fedpol and the Money Laundering Reporting Office Switzerland (MROS), represents one of the region's most sophisticated financial responses. The FIAHT Guide, published in November 2024 in partnership with the OSCE, provides financial intermediaries with specific 'red-flag' indicators, such as implausible cash flows or spending patterns linked to sex advertisements and escort services, as well as 'yellow-flag indicators.' Since the release of the country's first guidance to financial institutions, MROS reported the high-quality Suspicious Activity Reports (SARs) triggered by these indicators more than doubled. The State also sophisticatedly uses Open Source Intelligence tools (OSINT), transaction analysis, and cross-border financial monitoring to link bank accounts to illicit escort companies and integrated these efforts into both national and European public-private partnership workstreams.

J Technology and trafficking in human beings: Denmark

The Danish Centre against Human Trafficking (CMM) targets tech-facilitated trafficking through a multi-stakeholder initiative involving cyber police, financial institutions, and tech platforms. A central component since 2023 is the use of web-scraping tools that automatically analyse sexual services websites to identify concerning advertisements and gather systematic knowledge on the prostitution arena. This tech-driven approach is supported by a 'red flags' leaflet for the cyber and financial sectors to improve disruption efforts.

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