



Integrating Crisis-Related Provisions into Anti-Trafficking National Action Plans (NAPs)

Issue Brief

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Wallnerstr. 6, 1010 Vienna, Austria
Tel: + 43 1 51436 6664
Fax: + 43 1 51436 6299
Email: info-cthb@osce.org

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Issue Brief: Integrating Crisis-Related Provisions into
Anti-Trafficking National Action Plans (NAPs)

This publication has been developed under the lead of
Tetiana Rudenko, Senior Project Officer, OSCE Office of
the Special Representative and Coordinator for Combating
Trafficking in Human Beings (OSR/CTHB).

Design: Tina Feiertag
Photos: shutterstock
Illustrations: Flaticon

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The Organization for Security and Co-operation in Europe (OSCE) is a pan-European security body whose 57 participating States span the geographical area from Vancouver to Vladivostok. Recognized as a regional arrangement under Chapter VIII of the United Nations Charter, the OSCE is a primary instrument for early warning, conflict prevention, crisis management and post-conflict rehabilitation in its area. Its approach to security is unique in being both comprehensive and co-operative: comprehensive in that it deals with three dimensions of security – the human, the politico-military and the economic/environmental. It therefore addresses a wide range of security-related concerns, including human rights, arms control, confidence- and security-building measures, national minorities, democratization, policing strategies, counter-terrorism and economic and environmental activities.

PARTICIPATING STATES: Albania | Andorra | Armenia | Austria | Azerbaijan | Belarus | Belgium | Bosnia and Herzegovina | Bulgaria | Canada | Croatia | Cyprus | Czech Republic | Denmark | Estonia | Finland | France | Georgia | Germany | Greece | Holy See | Hungary | Iceland | Ireland | Italy | Kazakhstan | Kyrgyzstan | Latvia | Liechtenstein | Lithuania | Luxembourg | Malta | Moldova | Monaco | Mongolia | Montenegro | Netherlands | Norway | Northern Macedonia | Poland | Portugal | Romania | Russian Federation | San Marino | Serbia | Slovakia | Slovenia | Spain | Sweden | Switzerland | Tajikistan | Türkiye | Turkmenistan | Ukraine | United Kingdom | United States of America | Uzbekistan

ASIAN PARTNERS FOR CO-OPERATION : Afghanistan | Australia | Japan | Republic of Korea | Thailand
MEDITERRANEAN PARTNERS FOR CO-OPERATION: Algeria | Egypt | Israel | Jordan | Morocco | Tunisia

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The graphic consists of several overlapping rectangular boxes in shades of olive green and dark blue. The boxes are arranged in a staggered, descending pattern from top-left to bottom-right. Each box contains text representing a section of the document, with some boxes also featuring a large white number (1, 2, or 3) in a smaller box at the top right corner. The text is white on dark blue backgrounds and dark green on olive green backgrounds.

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Introduction

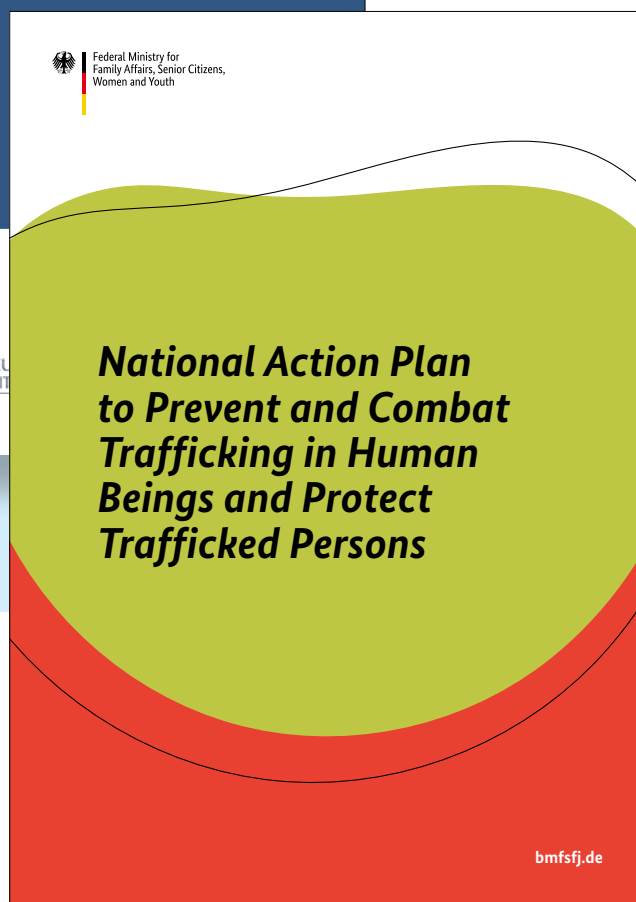
In 2000, in the OSCE's inaugural Ministerial Council Decision on trafficking in human beings¹, participating States recognized the need to enhance “efforts to combat trafficking in human beings throughout the OSCE region, including in conflict and post-conflict situations”, underscoring “the primary responsibility of participating States in combating trafficking based on an integrated and co-ordinated approach”. Yet a quarter of a century later, trafficking remains a pervasive and deeply entrenched crime while crises are directly or indirectly affecting OSCE participating States on a growing scale. Traffickers continue to demonstrate a high degree of adaptability: they exploit crises, rapidly expand into emerging physical and digital environments, and systematically target individuals and communities experiencing heightened vulnerability. At the same time, victims of trafficking continue to encounter significant and enduring obstacles to identification, protection, and access to justice in their own or in other countries. Prosecutions remain limited, and avenues for victim compensation are even more constrained. The persistent gap between the scale of the crime and the scale of response must serve as a sustained call for renewed political commitment, strategic investment, and co-ordinated action.

Recent years have demonstrated that crises function as powerful multipliers of vulnerability. Pandemics disrupt livelihoods, state budgets, and social systems; armed conflicts displace and affect millions; and natural and economic shocks erode household resilience. In each of these contexts, traffickers have been quick to exploit the opportunities created by instability and human suffering. Experiences from crisis situations demonstrate that trafficking risks emerge or deepen rapidly, often transcend borders, and manifest in complex and multifaceted ways.² These dynamics, which persist even after crises recede, require responses that are forward-looking, strategically planned, comprehensive, and adaptable. National Action Plans (NAPs) to combat human trafficking as mid-term strategy documents are a core tool to develop and implement such responses.

Nevertheless, analysis of over 60 NAPs or equivalent documents (strategies, roadmaps, and programmes) across OSCE participating States reveals that only about 15% of countries feature detailed crisis-related provisions in their anti-trafficking NAPs, while many limit themselves to outlining respective vulnerabilities without suggesting any specific action to address them. On the other hand, emergency response plans, often led by civil protection authorities, typically do not include anti-trafficking components. This issue brief highlights positive scalable practices regarding the reflection of crisis-related provisions in countries' NAPs with a view to enhancing preparedness of the national anti-trafficking mechanisms for possible future situations based on the lessons learned. The examples presented in this paper are intended to serve as reference points for National Anti-Trafficking Co-ordinators, Task Forces or Committees, and other equivalent mechanisms, supporting them in the development of national legislative and policy provisions, while also encouraging authorities in charge of emergency preparedness and response to consider human trafficking and co-ordinate with the above. Finally, the brief provides government stakeholders with an actionable four-pillar framework for translating crisis-related concerns into concrete policy responses within their NAPs.

1. OSCE Ministerial Council Decision No. 1: Enhancing the OSCE's effort to combat trafficking in human beings (2000), <https://www.osce.org/mc/14105>

2. For example, see ICAT Issue Brief 02, 06/2017: Trafficking in Persons in Humanitarian Crises, <https://icat.un.org/sites/g/files/tmzbd1461/files/publications/icat-ib-02-final.pdf>



Examples of
National Action Plans
across the OSCE region.



Analysis of the Impact of Crises and Related Vulnerabilities

Referring to specific crisis situations, the analysed NAPs or equivalent documents mostly focus on the impact of health emergencies and armed conflicts. Other situations, for example, natural disasters or economic crises, are mentioned to a far lesser extent.

COVID-19 Pandemic and Associated Lockdowns

The NAPs highlight a series of acute and chronic vulnerabilities generated by the COVID-19 pandemic that significantly reshaped the landscape of human trafficking. Restrictions on movement and the rapid shift to digital environments facilitated an observable increase in technology-enabled recruitment, coercion, and exploitation. Online platforms became central vectors for traffickers, who leveraged reduced physical oversight and heightened socio-economic stress to expand their operations.

Simultaneously, lockdown measures severely constrained victims' access to justice, protection, and essential support services. Barriers to reporting, limited operational capacity of front-line institutions, and disruptions in cross border co-operation collectively weakened the criminal justice response to human trafficking. These gaps underscore the need for robust emergency response protocols as a tool to sustain prevention, victim assistance, and criminal justice responses, which were mentioned to a far lesser extent.



Example Spain

National Strategic Plan against Trafficking and Exploitation of Human Beings, 2021–2023

... extremely serious situations that may arise at the national or international level – such as the COVID-19 pandemic – highlight the need for mechanisms that equip States with the tools required to enable rapid, effective, and co-ordinated action for the benefit of individuals in situations of extreme vulnerability, such as victims of human trafficking, sexual exploitation, or forced labour.

https://www.interior.gob.es/opencms/pdf/prensa/balances-e-informes/2021/220112_Plan_nacional_TSH_PENTRA_FINAL_2021_2023.pdf



Example Kyrgyz Republic

Resolution of the Cabinet of Ministers of the Kyrgyz Republic dated April 15, 2022 No. 227 “On the Program of the Cabinet of Ministers of the Kyrgyz Republic to combat human trafficking in the Kyrgyz Republic for 2022–2025”

The problem is becoming more complex and interconnected with other challenges, such as spontaneous migration processes, the demand for cheap labour, labour exploitation, the growth of informal employment, and the impact of the COVID-19 pandemic.

... Additionally, with the support of the OSCE Programme Office in Bishkek, work was carried out to develop specialized emergency response protocols focused on meeting the immediate needs of victims of human trafficking. This protocol will serve as the basis for the development of other similar departmental instructions for rapid response during the pandemic.

<https://www.refworld.org/legal/legislation/natlegbod/2022/150122>



Example Poland

National Action Plan Against Trafficking in Human Beings 2025–2027

The COVID-19 pandemic and the accompanying restrictions, including limitations regarding public life and mobility, prompted perpetrators to change their modus operandi by moving many elements related to recruiting victims online.

... Armed conflicts result in an increase in the number of victims of human trafficking both inside and outside the area where they take place. The continuing conflict in Ukraine and the high number of internally relocated persons and war refugees increases the risk of human trafficking for the Ukrainian population. The former conflict in Ukraine in 2014 doubled the number of Ukrainian victims detected two years later in 2016 in Eastern Europe.

<https://www.gov.pl/attachment/086bb484-3761-4035-b46e-dcb16170f4f2>

Armed Conflict and Humanitarian Emergency

The analysed NAPs often acknowledge a potential massive influx of people, especially women and children (including unaccompanied), creating conditions in which the risks of trafficking for sexual and labour exploitation intensified. Regrettably, emerging forms, such as human trafficking for exploitation in criminal activities often deliberately targeting displaced population, remain largely undressed.

Given the fluidity of the situation, the NAPs call for continuous monitoring, targeted prevention measures, and interventions to identify and support victims. Importantly, they also record the positive impact of early regulatory actions and co-ordinated prevention initiatives undertaken by national authorities and international partners, highlighting the value of timely, evidence-based policy responses in mitigating trafficking risks during large-scale humanitarian crises.



Example Switzerland
National Action Plan to Combat Human Trafficking 2023–2027

With regard to the war in Ukraine, Switzerland has not detected any increase in legal or illegal prostitution by Ukrainian women up to now. Nor have there been any confirmed cases of human trafficking among Ukrainian refugees. The authorities and NGOs have put in place timely regulations and measures to provide the greatest possible protection against exploitation and trafficking, for example with protection status S or by raising awareness among refugees and their carers.

Strategic goal 1:
The cantons create the conditions necessary for combating human trafficking effectively and take appropriate measures in emergency situations.



Example Unites States of America
The National Action Plan to Combat Human Trafficking, 2020

Certain environments are more likely to enable human traffickers to conduct and profit from their criminal exploitation. Human traffickers take advantage of breakdowns in the rule of law and weakened social support caused by conflict, natural disaster, and other crises to recruit victims.

<https://trumpwhitehouse.archives.gov/wp-content/uploads/2020/10/NAP-to-Combat-Human-Trafficking.pdf>

Specific target	Projected result	Concrete action	Indicator	Responsibility	Target date
1.2 An operational structure is in place for dealing with trafficking issues in emergency situations.	A basic organisational structure exists for dealing with emergency situations.	1.2.1 Define a concept for creating an organisational structure involving all stakeholders.	The concept includes threat scenarios and details on the organisational structure, its members and funding, as well as the funding of measures.	fedpol	2025

<https://www.admin.ch/de/nsb?id=92239>

Specific Vulnerabilities

Most prominently, the NAPs highlight vulnerabilities of people on the move, especially displaced from territories affected by conflicts; minorities; as well as vulnerabilities related to gender, age and disability/health aspects. At the same time, more attention needs to be paid to the intersectionality of vulnerabilities, which, combined with a lack of training for first line responders and an absence of specialized operational toolboxes, creates a critical bottleneck in initial identification and assistance.



Example Italy

National Action Plan against Trafficking and Serious Exploitation of Human Beings for the period 2022–2025

The outbreak of the war between Russia and Ukraine, and the rapid and massive migratory flow that ensued, has also shone the spotlight on the risk of serious abuse and exploitation to which people moving within the boundaries of Europe are exposed, especially women, minors, and people with disabilities, and serious and/chronic diseases.

<https://www.pariopportunita.gov.it/it/news-e-media/news/archivio/tratta-di-esseri-umani-il-consiglio-dei-ministri-approva-il-nuovo-piano-nazionale-d-azione-2022-2025/>



Example Cyprus

Strategy Document and Action Plan for the Prevention and Tackling of Human Trafficking and the Protection of the Victims, 2023–2026

The major causes that render a victim vulnerable to conditions of exploitation are deeply rooted in poverty, inadequate operation of the democratic institutions of the rule of the law, gender inequality and violence against women, wars and armed conflicts, natural disasters in the victims' country of origin, economic deprivation and social exclusion, lack of opportunities and employment, lack of access to education, child labour and discriminations.

<https://www.gov.cy/media/sites/21/2024/07/Strategy-Document-and-Action-Plan.pdf>



Example Romania

National Strategy Against Trafficking in Persons for the Period 2024–2028

Current issues in relation to preventing and combating trafficking in persons

7. Increased risk of human trafficking offences in the context of labour migration and the migration and refugee crises in Ukraine.

Against the background of an increasing number of foreign citizens coming to Romania for employment, there is a favourable environment for an incidence of human trafficking with non-EU citizens in Romania. At the same time, the migration crises and the military aggression of the Russian Federation against Ukraine have brought to the attention of the Romanian authorities the need to intervene in order to prevent human trafficking among refugees and asylum seekers.

<https://anitp.mai.gov.ro/programe-si-strategii/>

Prevention

Anti-trafficking NAPs predominantly prioritize preventive measures aimed at strengthening the capacities of specific agencies, particularly through training on combating human trafficking in humanitarian emergencies and appropriate operational responses. Many NAPs also emphasize the production and dissemination of targeted information materials designed to support prevention efforts and facilitate self-identification among at-risk populations. The measures to ensure proper integration of the crisis-affected population into the local labour market are featured to a lesser extent. However, policy instruments generally exhibit a notable gap in measures addressing structural drivers of exploitation, including insufficient attention to reducing demand that fosters trafficking for the purpose of sexual and labour exploitation. Furthermore, the incorporation of anti-trafficking considerations within post-conflict reconstruction and recovery frameworks remains a highly underutilized feature of NAPs.



Example Moldova

Action Plan on the Implementation of the Programme for the Preventing and Combating Trafficking in Human Beings for 2024–2028

Specific objective 1.3.

The professional training and retraining system ensures the development of the necessary knowledge and skills of specialists in the anti-trafficking field.

1.3.8 Organizing training for Border Police employees on combating human trafficking during the state of emergency, as well as on how to respond effectively to cases of human trafficking.

Specific objective 2.1.

By 2028, vulnerable groups and the general public are informed annually about the risks, consequences of human trafficking, methods of prevention and action.

2.1.7 Developing and distributing information materials for refugees from Ukraine on early signs of human trafficking.

Specific objective 2.3.

Potential emigrants and immigrants, including refugees from Ukraine, have access to the national and foreign labour market under fair and protected conditions.

2.3.1 Informing potential emigrants and immigrants, including refugees from Ukraine, on access to the national labour market (through Territorial Employment Offices).

https://old.gov.md/sites/default/files/document/attachments/subject-08-nu-714-cs-2023_0.pdf



Example Republic of Armenia

National Programme for the Organization of the Fight against Trafficking in Human Beings or Exploitation in the Republic of Armenia during 2023–2025

2.2.5 Raise awareness of the specialists involved in the system of the RA Ministry of Defense and other missions on the dangers of human trafficking and exploitation during armed conflicts, and existing mechanisms for combating it.

2.2.6 Conduct training courses for the personnel of the units participating in peacekeeping missions of the RA Ministry of Defense and military police on the manifestations, forms of human trafficking and exploitation, victim identification and support mechanisms.

<https://www.arlis.am/hy/acts/173192/latest>



Example Slovakia

National Program of Fight against Trafficking in Human Beings for 2024–2028

... the economic downturn caused by the COVID-19 pandemic and the energy crisis could increase the demand for cheap labour and sexual services. Legislation to regulate the knowing use of victim services is one option to address the demand side reduction.

In order to reduce the demand for services that support all forms of trafficking in human beings, legislative measures have been identified and are included in the area of criminal proceedings, but also need to be supported through prevention activities. These include, in particular, the implementation of education, training and awareness-raising activities.

<https://www.minv.sk/?informacne-centrum-na-boj-proti-obchodovaniu-s-ludmi-a-prevenciu-kriminality-1&subor=521228>



Example Sweden

Action Plan to Combat Exploitation in Prostitution and Human Trafficking 2026–2028

4.1.9 Strengthened Efforts Against Human Trafficking Through CAP International

For 2026, a grant of 1.5 million kronor will be provided to the Coalition for the Abolition of Prostitution International (CAP International). This operational support aims to strengthen international capacity to prevent and combat human trafficking for sexual exploitation, with a focus on civil society organizations and institutions in countries affected by armed conflict, displacement, and crisis, including Ukraine, Palestine, Lebanon, and Colombia.

<https://www.government.se/press-releases/2026/07/action-plan-against-exploitation-in-prostitution-and-human-trafficking/>



Example Finland

Finland Combats Human Trafficking, Action Plan Against Human Trafficking 2026–2027

4) Combating human trafficking through joint and comprehensive efforts

Work to combat human trafficking is cross-administrative. Strengthen Nordic co-operation to prevent and combat human trafficking, and take human trafficking prevention objectives into account in the reconstruction of Ukraine.

Measures	Responsible body	Timeline
43. The objectives of preventing human trafficking will be taken into account in cross-border co-operation regarding the reconstruction of Ukraine.	MFA	2026-2027

<https://julkaisut.valtioneuvosto.fi/items/3fb5b436-58ba-4c5d-993c-917909a55a3e>

Identification and Assistance

NAPs consistently highlight the importance of awareness-raising measures and the sensitization and training of relevant professionals as central components of effective identification of and assistance for victims of trafficking in crisis- and conflict-related settings. However, some key victim-centred safeguards – including the effective application of a reflection period, access to compensation, provision of legal aid and other tailored services, and the involvement of cultural mediators – receive significantly less emphasis. This imbalance suggests a continued need for a more nuanced and targeted approach to the protection of such victims, including from the risks of re-trafficking.



Example Germany

National Action Plan to Prevent and Combat Trafficking in Human Beings and Protect Trafficked Persons, 2024

People who are refugees to or migrate to Germany are especially vulnerable to exploitation. This is especially the case for refugees to Germany escaping conflict and war, and also for foreign workers and the isolated situation of domestic staff employed in diplomatic households. These groups are especially vulnerable on account of their poor language proficiency and lacking knowledge regarding their rights and the availability of help and support programmes, and not least their precarious residency situations and lacking economic perspectives. ...

Identifying vulnerable applicants in asylum procedures remains an important, continuously developing task of the Federal Office for Migration and Refugees (BAMF). The existing referral procedures and networking structures concerning the specialised counselling centres will be maintained and expanded. In addition to the work done by the BAMF, the police and customs, identification of victims of human trafficking must also be ensured in refugee shelters. We want to continue existing (model) projects and promote the development of a model for a specialised centre to identify the special protection needs among refugees.

Objective: Consolidating and strengthening counselling and support services

Measure	Duration	Responsibility	Output/Indicator
Support programmes for the empowerment of refugee women and other vulnerable groups (Diakonie Deutschland)	2023-2024	Integration Commissioner	Identification of victims and supporting them in seeking and developing perspectives for the future, networking, specialist support and awareness-building for professionals, training of survivors to become everyday companions (peer-to-peer approach), creation of a nationwide platform for exchange between survivors, and development of guidance for specialised counselling centres

<https://www.bmbfsfj.bund.de/bmbfsfj/meta/en/publications-en/national-action-plan-to-prevent-and-combat-trafficking-in-human-beings-and-protect-trafficked-persons-258216>

Risk-Based Approach

A risk-based approach, although not widely applied in the NAPs reviewed, offers a distinct strategic advantage. It enables the systematic identification and assessment of potential risks, supports the formulation of targeted mitigation measures, and underscores the importance of establishing robust contingency planning mechanisms.



Example Slovakia

National Program of Fight against Trafficking in Human Beings for 2024–2028

Such specific position of vulnerability also needs to be translated into targeted approaches, tools and services for the identification, assistance and integration of victims, focusing in particular on the development of awareness-raising materials for Ukrainian and third country nationals, warning of the dangers and risks that can lead to trafficking, disseminated in multiple languages (including Ukrainian), tailored to the needs of specific groups such as women and children who are at increased risk in the current context; targeted and systematic training of professionals in vulnerability and victim identification among foreigners, especially for those professional groups likely to come into contact with victims; sensitising labour inspectors, foreign police officers and other professionals involved in control mechanisms using a victim-centred approach; focusing on the effective application of the reflection period in the case of foreign victims; enabling all victims of trafficking (including those crossing national borders without valid travel documents and entry permits) to exercise their right to compensation by ensuring access to legal aid, as well as creating a toolbox and opportunities for the use of cultural mediators.

<https://www.minv.sk/?informacne-centrum-na-boj-proti-obchodovaniu-s-ludmi-a-prevenciu-kriminality-1&subor=521228>



Example North Macedonia

National Strategy and Action Plan for combating human trafficking and illegal migration, 2021–2025

External treats

Threat	Level of Risk	Risk Management
Massive mixed migration movements that exceed national capacities. Reduced capability for implementing the process of VoT and PVoT identification among the vulnerable categories of migrants.	High	Drafting a plan with measures and activities for dealing with the assessed risk. Competent institution – Crisis Management Centre and MOI.
A large-scale pandemic caused by viruses and other health threats. As a result of these threats a state of emergency is declared and there is an increased engagement by the competent institutions related to dealing with the threat. As a result of such an engagement the institutional capacities for identification, protection, assistance and support of the PVoT and VoT are reduced.	High	Drafting an operational plan for dealing with victims of trafficking during crisis with precisely defined activities, responsible authority and time framework. Competent institutions MOI/UCTHBMS/NUCMSTHB, MLSP/NRM/IMSWC/CSW/SLI and CA involved in the prevention, identification, protection, assistance and support of the VoT. The plan should ensure minimum functionality of the system for combating trafficking in human beings during emergencies, which also envisages a minimum package of services available to the victims in order to satisfy their direct needs during the pandemic.

<https://portal.mdt.gov.mk/post-body-files/strategii-file-hqJO.pdf>

Complex Approach

The complex approach appears the least utilized across the analysed NAPs, despite its strategic value. This approach enables the systematic adaptation of laws, policies, and operational procedures to reflect crisis-related scenarios; supports the development of sustainable anti-trafficking training programmes for newly involved actors, including to ensure that they do not unintentionally contribute to human trafficking³; and facilitates the design and co-ordination of tailored measures that strengthen prevention, identification, and protection capacities.



Example Ukraine

State Targeted Social Programme for Combating Human Trafficking until 2025

As a result of the armed aggression of the Russian Federation against Ukraine, which began in 2014, and the full-scale invasion of Ukraine on February 24, 2022, the number of crimes related to human trafficking in Ukraine has increased. The mass displacement of citizens from temporarily occupied territories and territories where hostilities are ongoing, the search for a new place of residence, work, and a high level of competition in the labour market have led to an increase in the level of vulnerability of citizens and the risk of falling into a situation related to human trafficking.

The pandemic of acute respiratory disease COVID-19, caused by the SARS-CoV-2 coronavirus, has become a serious challenge in the field of combating human trafficking not only in Ukraine, but throughout the world, as it is associated with the loss of income due to forced stay at home, social contacts, closed borders, fear for one's own health and the health of loved ones.

<https://zakon.rada.gov.ua/laws/show/496-2023-%D1%80#Text>

Task 1. Improving the regulatory framework in the field of combating human trafficking

Indicator	Target	Measure	Key Implementor(s)	Budget
Number of adopted regulatory legal acts	1	3) development and submission to the Cabinet of Ministers of Ukraine of a draft act on amendments to the legislation in order to ensure the rights of citizens of Ukraine who are victims of human trafficking, temporarily staying abroad and who are subject to the jurisdiction of other States	Ministry of Social Policy Ministry of Internal Affairs Ministry of Foreign Affairs National Police State Migration Service	State Budget
Number of proposals submitted by the Ministry of Internal Affairs	2	9) conducting an analysis and, if necessary, developing draft regulatory legal acts taking into account the conditions of martial law, in particular regarding the provision of appropriate travel documents to children evacuated abroad	State Migration Service Ministry of Internal Affairs Ministry of Foreign Affairs Ministry of Social Policy Administration of the State Border Guard Service Ministry of Digitalization	State Budget
Share of children evacuated abroad who are provided with travel documents, percent	100			

3. For example, see Identification of trafficking in human beings related to the humanitarian crisis stemming from the war against Ukraine - Brief for first line responders, Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, <https://cthb.osce.org/cthb/561466> and Addressing trafficking in human beings related to the humanitarian crisis stemming from the war against Ukraine - Code of conduct for first line responders, Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, <https://cthb.osce.org/cthb/565006>

**Task 2. Strengthening institutional capacity,
policy co-ordination and co-operation between actors
implementing measures to combat human trafficking**

Indicator	Target	Measure	Key Implementor(s)	Budget
Number of special courses developed	1	9) development of a distance learning special course for volunteers to raise their awareness of human trafficking in conditions of military aggression	Ministry of Social Policy National Social Service	State Budget
Number of volunteers trained	500			
Number of meetings of co-ordination councils held in regions, districts and cities	504	13) organizing the activities of local co-ordination councils on combating human trafficking, as well as holding interdepartmental meetings on preventing human trafficking and organizing assistance to victims of human trafficking, establishing an effective mechanism for victims' referral, etc., taking into account the challenges and threats associated with the full-scale invasion of the Russian Federation into the territory of Ukraine	Regional, Kyiv city state administrations (military administrations) local self-governance bodies (upon consent)	Local Budgets

Task 3. Strengthening international co-operation

Indicator	Target	Measure	Key Implementor(s)	Budget
Number of analytical reports on the experience of other countries published on the official website of the Ministry of Social Policy	2	4) studying the experience of other countries in identifying persons who have suffered from human trafficking, in particular those who have been used in armed conflict	Ministry of Social Policy National Social Service Ministry of Foreign Affairs Ministry of Internal Affairs State Migration Service National Police	Funding from international organizations
Number of monitoring measures and reports to the Ministry of Social Policy	12	8) monitoring evacuated children who are relocated abroad as part of institutions to ensure their consular registration and protection of their rights	National Social Service Ministry of Foreign Affairs regional, Kyiv city state administrations (military administrations)	State Budget

**Task 5. Counteracting criminal offenses
in the field of human trafficking**

Indicator	Target	Measure	Key Implementor(s)	Budget
Number of events held	36	5) exercising control to prevent the use of child labour, in particular the involvement of children in armed conflicts	regional, Kyiv city state administrations (military administrations) local self-governance (upon consent) Ministry of Defense Ministry of Internal Affairs National Police	Local Budgets



Example Türkiye

National Action Plan to Combat Trafficking in Human Beings, 2025–2030

Strategy 1.5. Combating Human Trafficking

in Cases of Disaster and Emergency

Türkiye is a country that frequently experiences many types of disasters. In addition to numerous natural disasters such as earthquakes, landslides, floods and avalanches, it also frequently faces man-made humanitarian crises due to its geopolitical location. ... Although all segments of society are affected by disasters, children and women are particularly vulnerable to humanitarian crises. Children and women are the most vulnerable groups in emergencies, facing risks such as disease, malnutrition, violence and human trafficking.

https://www.goc.gov.tr/kurumlar/goc.gov.tr/Kurumsal/Stratejik-Yonetim/2025/ITM-Ulusal-Eylem-Plani/2025/08-Temmuz/3Ulusal-Eylem-Plani/Insan-Ticaretiyle-Mucadele-Ulusal-Eylem-Plani-ENG_web-_sirali-sayfa_.pdf

Activity 1.5.1:

Provisions on preventing human trafficking in cases of disaster will be added to disaster and emergency response plans.

Description	Method	Period	Performance Indicators	Responsible Authority	Relevant Institution
... Human trafficking is among these risks and threats during disasters and emergencies. Ensuring the protection of disaster victims against this threat should be made an integral part of disaster and emergency management, thereby making the combat against human trafficking in extraordinary circumstances an important agenda item. To prioritise the combat against human trafficking in cases of disaster and emergency and institutionalise related efforts, measures to prevent human trafficking should be included in disaster and emergency response plans.	Regulations will be made in disaster and emergency response plans to include measures to combat human trafficking.	Medium Term	Making necessary arrangements in disaster and emergency response plans.	Disaster and Emergency Management Presidency	Presidency of Migration Management

Activity 1.5.2:

Risk groups that may be subject to human trafficking will be identified for consideration in disasters and emergencies; a workflow will be developed and shared with relevant actors.

Description	Method	Period	Performance Indicators	Responsible Authorities	Relevant Institutions
The aim is to establish a sensitive referral mechanism for risk groups (children, the elderly, persons with disabilities, and women) who may be subject to human trafficking during disasters and emergencies.	Risk groups that may be subject to human trafficking in the event of a disaster will be identified. Urgent and essential needs of the identified risk groups will be determined, a protection and guidance mechanism will be developed, communication with relevant stakeholders will be established, appropriate support services will be identified, and intervention systems will be developed to refer individuals to these services. A human trafficking response workflow will be developed for staff involved in disaster and emergency response. The content produced will be disseminated to the staff working in public institutions and civil society organisations during the disaster response process.	Medium Term	Identifying risk groups, developing a systematic approach to preventing human trafficking in disaster and emergency cases, establishing workflows, and disseminating materials produced to relevant actors.	Disaster and Emergency Management Presidency Presidency of Migration Management	Ministry of Family and Social Services, Turkish National Police, Gendarmerie General Command, and Turkish Red Crescent

Activity 1.5.3:

Training on human trafficking will be provided to professionals responsible for disaster and emergency management, and human trafficking offences will be included in the in-service training curriculum.

Description	Method	Period	Performance Indicators	Responsible Authorities	Relevant Institution
During disasters and emergencies, numerous public institutions and various non-governmental organisations play roles in managing the disaster process. It is important that these actors are aware of and sensitive to human trafficking while carrying out their duties during the disaster process in order to minimise the potential negative effects and risks of human trafficking.	Under the co-ordination of the Disaster and Emergency Management Presidency, training on combating human trafficking will be provided to professionals and volunteers responsible for emergency situations. Within this scope, in the first phase, training for trainers will be provided to staff of the Disaster and Emergency Management Presidency under the co-ordination of the Presidency of Migration Management. The offense of human trafficking will be included in the in-service training curriculum, and training on combating human trafficking will be provided to both newly recruited professionals and current staff and volunteers.	Long Term	Determination of training staff through training of trainers, inclusion of human trafficking offences in the in-service training curriculum, number of training courses organised, and number of participants.	Disaster and Emergency Management Presidency Presidency of Migration Management	Turkish Red Crescent

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Recommendations

Effective anti-trafficking action cannot begin once a crisis is already unfolding. When emergency stakeholders are fully absorbed in responding to an active humanitarian or security emergency, it is too late to initiate outreach, set up co-ordination mechanisms or provide specialized anti-trafficking training for increased capacity. Likewise, the development of new legislation, procedures, or institutional frameworks cannot be undertaken when national capacities are already overstretched by the demands of crisis management. In such circumstances, the absence of advance planning and preparedness inevitably leads to fragmented, limited, siloed interventions precisely at the moment when co-ordinated action is most essential. The result is parallel emergency-response and anti-trafficking efforts that risk duplicating activities, overwhelming existing structures and staff, overlooking critical gaps, and failing to protect those

most at risk. This is an outcome that no government can afford when time, personnel, and resources are under severe strain. The period in which policy intervention can shape outcomes is prior to the onset of crisis, not in its aftermath. In this context, preparedness constitutes a core strategic requirement, rather than a discretionary activity.

Despite the obvious urgency, this and other reviews⁴ suggest that countries have just begun to explore how human trafficking considerations can be structurally integrated into crisis preparedness efforts, humanitarian responses, and post-crisis recovery programmes. To assist national authorities in strengthening the resilience of their anti-trafficking responses through NAPs, the following four-step comprehensive approach is suggested:



1 | EVALUATION OF THE RISKS

Conduct analysis taking into account various types of crisis and emergency contexts and their phases⁵, paying due attention to post-crisis reconstruction and recovery efforts

Governments should employ a comprehensive and dynamic analytical framework that accounts for the distinct typologies and operational phases of diverse crisis and emergency contexts, with a particular emphasis on identification of human trafficking risks and mitigation measures required. By systematically mapping the transition from early warning to acute emergency response and to post-crisis reconstruction and recovery efforts, this approach ensures that institutional planning, resource allocation, and governance mechanisms are adaptively tailored to the evolving trafficking risks and structural needs of affected populations.



2 | LEGISLATION AND POLICIES

Review legislative and policy measures to ensure they provide for crisis- and emergency-related anti-trafficking interventions

To move away from ad hoc reactive measures, governments should pre-emptively embed crisis response actions into anti-trafficking legislative and policy frameworks, and in parallel, embed anti-trafficking measures into emergency legislative and policy frameworks. Comprehensive legal audits of existing anti-trafficking frameworks will help institutionalize statutory mechanisms that automatically activate upon a declared state of emergency. By codifying these responsive contingencies into primary legislation and key anti-trafficking strategies and policies, policymakers can mitigate the compounding vulnerabilities of affected populations and prevent transnational criminal networks from exploiting possible administrative disruptions. Furthermore, these legislative baselines should establish the necessary compliance protocols to ensure that public funds do not inadvertently finance exploitative entities.

4. For example, see Ending forced labour by 2030: A review of policies and programmes | International Labour Organization, <https://www.ilo.org/publications/major-publications/ending-forced-labour-2030-review-policies-and-programmes>

5. See Decision No. 3/11 on elements of the conflict cycle, related to enhancing the OSCE's capabilities in early warning, early action, dialogue facilitation and mediation support, and post-conflict rehabilitation, Organization for Security and Co-operation in Europe, <https://www.osce.org/ministerial-councils/86621>



3 | OPERATIONAL PLANNING

Establish emergency response protocols/plans/SOPs on combating trafficking in human beings for various scenarios and phases

To ensure rapid, standardized action, institutional actors must develop scenario-specific Standard Operating Procedures (SOPs) and emergency protocols that systematically operationalize anti-trafficking measures across all phases of a crisis. These protocols must outline clear institutional roles, information- and intelligence-sharing mechanisms, prevention action, referral pathways, and protection triggers customized for distinct crisis typologies – ranging from acute natural disasters or emergencies to protracted geopolitical conflicts. By mapping distinct operational mandates for the onset, climax, stabilization, and recovery phases, these SOPs should streamline collective response, eliminate organizational friction, enable first responders to rapidly identify conflict- or crisis-induced trafficking indicators, secure functional referral, and maintain the continuity of prevention work, protective services, and prosecution efforts amid severe systemic workload.



4 | CO-ORDINATION AND CAPACITY

Institutionalize cross-pollination by integrating crisis response into anti-trafficking mechanisms and anti-trafficking considerations into crisis- and emergency-response mechanisms, supported by proactive capacity-building

To foster a unified operational architecture, States should formally integrate emergency response, civil defence/protection, and disaster management agencies into national anti-trafficking co-ordination mechanisms, such as task forces and commissions. This institutional integration will provide for the establishment of interoperable data networks that facilitate real-time data-sharing pathways and co-ordination between anti-trafficking and emergency response stakeholders. Furthermore, capacity-building frameworks should mandate standardized, crisis-specific anti-trafficking training for all first line responders – including emergency response personnel, national guards, firefighters, medical personnel, and civil defence forces – while embedding permanent, mandatory counter-trafficking modules within the standardized curricula for such emergency response personnel.

Conclusion

Failing to integrate anti-trafficking safeguards into emergency preparedness directly compromises national resilience, increases long-term state expenditures, adds to the already overstretched capacities and, most importantly, increases direct harm to affected populations. As anti-trafficking National Action Plans serve as an essential tool to translate policy priorities into concrete actions, they should be more actively utilized to convert crisis-related concerns into concrete, actionable, and financed policy responses.

The Organization for Security and Co-operation in Europe works for stability, prosperity and democracy in 57 States through political dialogue about shared values and through practical work that makes a lasting difference.