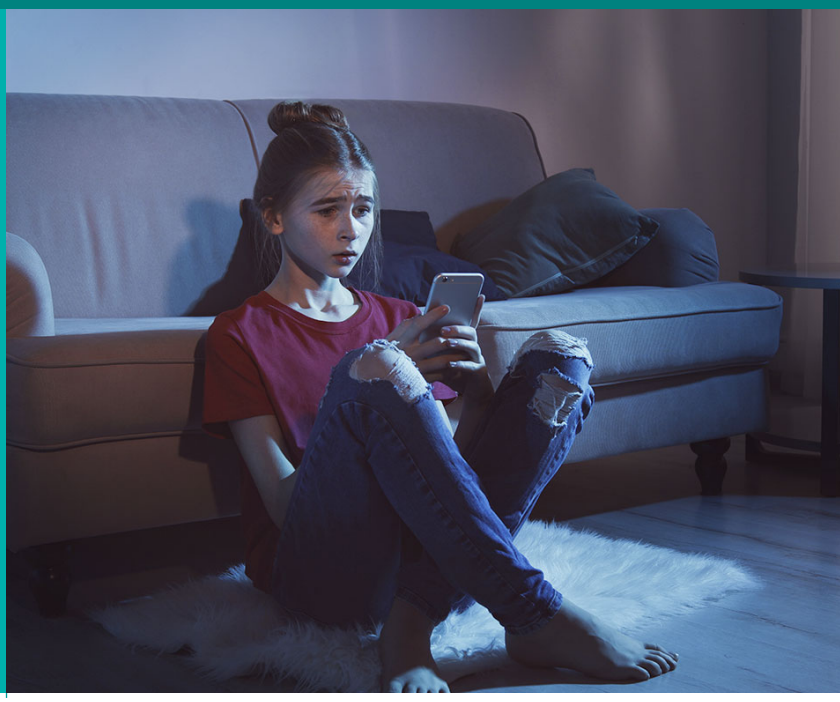
FOURTH EVALUATION ROUND

Measures to prevent and detect vulnerabilities to human trafficking

EVALUATION REPORT

ROMANIA



GRETA

Group of Experts on Action against Trafficking in Human Beings

Implementation of the Council of Europe Convention on Action against Trafficking in Human Beings

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Preamble

In accordance with Article 38, paragraph 1, of the Convention on Action against Trafficking in Human Beings ("the Convention"), GRETA evaluates the implementation of the Convention following a procedure divided into rounds. At the beginning of each round, GRETA selects the specific provisions on which the evaluation procedure is based.

The first round of monitoring of the Convention provided an overview of its implementation by States Parties. The second evaluation round examined the impact of legislative, policy and practical measures on the prevention of trafficking in human beings (THB), the protection of the rights of victims, and the prosecution of traffickers, paying particular attention to measures taken to address new trends in human trafficking, in particular trafficking for the purpose of labour exploitation, and child trafficking. The third evaluation round focused on trafficking victims' access to justice and effective remedies.

For the fourth evaluation round of the Convention, GRETA has decided to focus on vulnerabilities to human trafficking and measures taken by States Parties to prevent them, detect and support vulnerable victims, and punish the offenders. An additional focus concerns the use of information and communication technology (ICT) to commit human trafficking offences, which brings structural changes to the way offenders operate and exacerbates existing vulnerabilities.

A number of provisions of the Convention establishing substantive and procedural obligations are relevant to this topic. The concept of "vulnerability" appears in Articles 4 (definitions), 5 (prevention of trafficking in human beings) and 12 (assistance to victims). According to paragraph 83 of the Explanatory report to the Convention, "by abuse of a position of vulnerability is meant abuse of any situation in which the person involved has no real and acceptable alternative to submitting to the abuse. The vulnerability may be of any kind, whether physical, psychological, emotional, family-related, social or economic. The situation might, for example, involve insecurity or illegality of the victim's administrative status, economic dependence or fragile health. In short, the situation can be any state of hardship in which a human being is impelled to accept being exploited. Persons abusing such a situation flagrantly infringe human rights and violate human dignity and integrity, which no one can validly renounce."

GRETA refers to the ICAT Issue Brief No. 12/2022 on Addressing vulnerability to trafficking in persons which refers to vulnerability as "those inherent, environmental or contextual factors that increase the susceptibility of an individual or group to being trafficked". It classifies vulnerability factors in three categories: personal (e.g. age, gender, ethnicity, disability), situational (e.g. destitution, unemployment, legal status) and contextual (e.g. discriminatory laws, policies and social norms, armed conflicts, crises) factors, which interact and may increase the risk of human trafficking for certain individuals, groups and/or communities.[1] Vulnerability to human trafficking is also subject to intersectional factors, such as gender, belonging to a minority group and socio-economic status.

In addition to the thematic focus on vulnerabilities to human trafficking, GRETA has decided that each State Party will receive country-specific follow-up questions related to recommendations not implemented or partially implemented after the third evaluation round.

GRETA recalls that it has adopted the use of three different verbs - "urge", "consider", and "invite" – which correspond to different levels of urgency for bringing the State Party's legislation and/or practice into compliance with the Convention. Thus, GRETA uses the verb "urge" when it assesses that the national legislation or policies are not in compliance with the Convention or when it finds that, despite the existence of legal provisions and other measures, the implementation of a key obligation of the Convention is lacking. In other situations, GRETA "considers" that it is necessary to make further improvements to fully comply with an obligation of the Convention. By "inviting" a country to pursue its efforts, GRETA acknowledges that the authorities are already on the right track and encourages them to continue existing action.

[1] ICAT Issue Brief No. 12 on Addressing vulnerability to trafficking in persons - Search (bing.com)

Executive summary

This report, covering the period 2020-2024, evaluates the measures taken by Romania to prevent vulnerabilities to trafficking in human beings (THB), detect and support vulnerable victims, and punish the offenders. In doing so, it pays particular attention to the use of information and communication technology (ICT) to commit human trafficking offences as well as the use of technological innovations to prevent THB, protect victims and prosecute traffickers. The report also evaluates progress made in selected areas examined by GRETA during previous evaluation rounds.

Over the years, the Romanian authorities have taken a series of steps to put in place a comprehensive legislative, institutional and policy framework for combating THB. In 2024, the criminal law provisions related to THB were amended by increasing the sanctions, prohibiting suspended prison sentences and abolishing the statute of limitations. Further, the legislation related to trafficking victims' access to legal aid and to state compensation was also amended. In January 2023, the Interministerial Committee for Strategic Intersectoral Coordination of the Fight against THB was established, chaired by the State Counsellor of the Prime Minister's Chancellery. Moreover, in December 2023, the Romanian Parliament established a Joint Special Committee of the Chamber of Deputies and the Senate for Combating Human Trafficking. The new National Strategy against THB (2024-2028) and the accompanying National Action Plan take into account previous GRETA recommendations and contains measures to prevent exploitation among vulnerable groups.

The number of victims identified by the Romanian authorities in the period 2020-2024 was of 2 662. Most of the victims were female and nearly half were children. THB for the purpose of sexual exploitation has remained predominant, followed by labour exploitation, forced begging and forced criminality. The majority of the identified victims were Romanian nationals trafficked within the country or to countries such as UK, Germany, Italy, France and Spain. Further, there has been a growing number of foreign victims trafficked for labour exploitation.

Children from Roma communities, children in institutional care and children in street situations are particularly vulnerable to human trafficking. High school dropout rates, particularly in rural areas, remain a serious concern, often driven by poverty and social exclusion. Many identified victims had previously been in institutional care, which highlights the need for stronger child protection. The report notes that the staff of institutions for children lack training on trafficking risks and despite awareness-raising efforts, children's understanding of trafficking risks is low. GRETA urges the Romanian authorities to increase the resources of child protection services and implement social and economic measures and programmes aimed at supporting children in vulnerable situations, including those in or leaving institutional care.

Members of the Roma community remain particularly vulnerable to THB due to poverty, unemployment, school dropouts, housing deprivation and discrimination. The National Strategy for the Inclusion of Roma (2022-2027) covers many areas relevant to preventing THB, such as education, employment, health and housing, and envisages the expansion of the number of health mediators. GRETA considers that the Romanian authorities should continue strengthening the prevention of THB among the Roma community by promoting their access to education, employment, housing, healthcare and social services, as well as involving Roma organisations in the design and implementation of anti-trafficking policies and measures.

The authorities have implemented measures to reduce vulnerabilities among Romanians working abroad, including through helplines providing information, the presence of social and employment attachés at Romanian embassies, and the Action Plan for the Information and Protection of Romanian Seasonal Workers. GRETA considers that the Romanian authorities should continue strengthening co-operation with countries of destination and raising awareness about safe and legal employment abroad.

The large emigration of Romanian citizens has created demand for foreign workers, many of whom originate from South Asia (Nepal, India, Bangladesh). Migrant workers face a high risk of trafficking due to language barriers, deceptive employment practices and inadequate protection. Gaps in the migration legislation, weak regulation and oversight of recruitment agencies, and the absence of bilateral agreements with countries of origin of the workers heighten the risk of exploitation. GRETA urges the Romanian authorities to strengthen protection for foreign workers by revising the relevant legislative framework, establishing safe reporting and effective complaint mechanisms, introducing licensing of recruitment agencies and monitoring fraudulent online job advertisements.

The number of asylum applications in Romania has increased during the reporting period. International protection beneficiaries have equal rights with Romanian citizens as regards employment, healthcare, education and social housing. However, they are often employed in the hospitality and construction sectors at the minimum wage, which is insufficient for families with multiple children. Following Russia's full-scale invasion of Ukraine, Romania adopted an action plan to prevent sexual exploitation, abuse and trafficking of Ukrainian refugees, set up county task forces and procedures for registering vulnerable Ukrainian children, and launched a dedicated refugee helpline. Awareness campaigns and frontline worker training were also conducted. While welcoming these efforts, GRETA considers that the Romanian authorities should improve the social and economic integration of asylum seekers and refugees as well as conduct regular and comprehensive assessments of exploitation and THB risks among them.

While welcoming the steps taken to address violence against women, GRETA considers that the Romanian authorities should take measures to reduce the risks of exploitation of women and girls in prostitution, including by abrogating the administrative offence of prostitution and developing exit programmes for those wishing to leave prostitution, and address the vulnerability of persons engaged in sex videochat activities.

Persons with disabilities in Romania are vulnerable to THB due to social exclusion, poverty and limited access to justice, employment, healthcare and information. In 2022, Romania introduced legislative amendments to reform the guardianship system for persons with disabilities and adopted the National Strategy for Preventing Institutionalisation and Accelerating Deinstitutionalisation (2022-2030) and the National Strategy for the Rights of Persons with Disabilities (2022-2027). Despite these efforts, there have been cases of private and state-run institutions exploiting people with disabilities. In 2023, 69 victims of THB were identified amongst persons with disabilities, some of whom were accommodated in two state-run residential centres for the elderly. GRETA urges the Romanian authorities to ensure a regular, effective and independent monitoring of residential centres for persons with disabilities and improve their access to social, economic and healthcare services in order to reduce their vulnerabilities to human trafficking.

While welcoming the adoption of a new National Mechanism for Identification and Referral of Trafficking Victims in 2023 and the issuing of guidelines to relevant professionals, GRETA is concerned about persistent barriers to proactive victim detection. Insufficient police training on trauma-informed approaches hampers the identification of victims of THB for the purpose of sexual exploitation. Further, widespread bias against some vulnerable groups, such as Roma, LGBTI persons and migrant workers, hampers proactive identification of victims of THB amongst them. GRETA considers that the authorities should continue providing training to all relevant professionals, ensure that the Labour Inspectorate has the mandate and resources to carry out inspections in all economic sectors, and enable specialised NGOs with experience in identifying victims of trafficking to have regular access to asylum and detention facilities.

There are currently four licensed state-run residential centres for victims of THB: three for adults and one for girls. Due to the limited capacity of specialised shelters, female THB victims are often placed in domestic violence shelters, while men stay in homeless facilities. GRETA urges the Romanian authorities to intensify their efforts to provide assistance to victims of trafficking, in particular by providing adequate and safe accommodation to all victims who need it, including men, ensuring adequate funding and staff to work with victims of THB and facilitate the reintegration of victims of trafficking into society, and guaranteeing access to health care to all victims.

In 2020-2024, 764 individuals were convicted of THB offences. There were at least four convictions involving legal entities. GRETA notes that THB cases are often prosecuted as lesser offences due to law enforcement and judicial actors' lack of expertise and difficulties in proving THB. Further, prosecutions heavily rely on victim and witness testimony. This hinders effective investigations and prosecutions because victims are often threatened or paid by the traffickers to change their testimony or they retract their testimony due to emotional ties with traffickers. Another issue of concern is the involvement of public officials in human trafficking. While welcoming the progress in asset seizure and confiscation and Romania's active participation in international co-operation in the anti-trafficking field, GRETA considers that the authorities should ensure that THB offences are proactively and promptly investigated, making use of special investigation techniques in order to decrease reliance on victim testimony, and strengthen the human resources of the Department for Combating Organised Crime and the Directorate for Investigating Organised Crime and Terrorism.

While welcoming the recent legislative amendments strengthening victim protection and the development of victim interviewing guidelines, GRETA is concerned about the inconsistent application of victim and witness protection measures. Therefore, GRETA considers that the Romanian authorities should ensure that the protection measures provided for in law are effectively applied to victims of human trafficking and that any cases of intimidation and threats against victims are effectively investigated and sanctioned.

The Romanian authorities have noted an increased use of online platforms for recruiting and exploiting victims, including through sex videochat activities. A series of awareness-raising campaigns on online exploitation risks have been conducted. Police officers and prosecutors have received training to enhance their capacity to handle THB and other serious ICT-facilitated crimes. Further, in 2022, the Romanian Police acquired forensic software to detect online sexual exploitation. The current National Action Plan against THB includes measures to address the growing abuse of ICT to commit human trafficking offences. GRETA welcomes these steps and considers that the Romanian authorities should continue investing in capacity building and digital tools, strengthen co-operation with ICT companies and Internet service providers, and develop data-sharing procedures with companies holding relevant data.

GRETA welcomes recent legislative amendments to improve trafficking victims' access to legal assistance and free legal aid and considers that the Romanian authorities should encourage the Bar Associations to offer training on THB to lawyers with a view to ensuring that trafficking victims are systematically appointed a lawyer with training on THB.

While a number of victims of THB have been awarded compensation from perpetrators by courts, few victims actually received it due to enforcement challenges. Further, despite amendments of the legislation on state compensation, only one victim of THB is known to have been granted state compensation during the reporting period. GRETA considers that the Romanian authorities should take further steps to facilitate and guarantee access to compensation for victims of trafficking, in particular by making compensation awarded in criminal proceedings payable by the State in advance, and the State taking the responsibility to recover the amount from the offender. GRETA also urges the authorities to review the legislation to enable victims of trafficking for the purpose of sexual exploitation to claim compensation from their traffickers for the earnings from exploitation in prostitution that were withheld from them by traffickers.

Following GRETA's previous recommendation, the Romanian authorities have amended the legislation to explicitly provide that THB victims are not to be punished for prostitution or begging in public places. However, GRETA notes that many persons exploited in prostitution are not identified as victims and are instead fined. GRETA considers that the Romanian authorities should take further measures to ensure effective compliance with the principle of non-punishment of victims of THB for their involvement in unlawful activities, to the extent that they were compelled to do so, such as the development of guidance for police officers and prosecutors on the scope and application of the non-punishment provision.

General information on trafficking in human beings in Romania
(covering the period from 2021 until 4 July 2025)

Entry into force of the CoE Anti-Trafficking Convention	1 February 2008
Previous evaluations by GRETA	First evaluation report - 31 May 2012 Second evaluation report - 30 September 2016 Third evaluation report - 3 June 2021
Co-ordination of national action against THB	• National Anti-Trafficking Coordinator: the State Counsellor of the Prime Minister's Chancellery • National Agency against Trafficking in Persons (ANITP) within the Ministry of the Interior • Interministerial Committee for Strategic Intersectoral Coordination of the Fight against Trafficking in Human Beings • Joint Special Committee of the Chamber of Deputies and the Senate for Combating Human Trafficking • Working Group for the Prevention of Sexual Exploitation, Abuse and Risks of Trafficking in Human Beings targeting refugees from Ukraine
National Rapporteur	National Agency against Trafficking in Persons
Specialised bodies and NGOs	• Department for Combating Organised Crime (DCCO) within the General Inspectorate of the Romanian Police • Directorate for Investigating Organised Crime and Terrorism (DIICOT) within the Prosecutor's Office (which includes a Unit for Combating Trafficking in Human Beings) • ProTECT collaborative platform, which brings together 25 of the most active anti-trafficking organisations
National Strategy/Action Plan	• National Strategy against Trafficking in Human Beings for 2018-2022 and its National Action Plans for 2018-2020 and 2021-2022 • National Strategy against Trafficking in Human Beings for 2024-2028 and its National Action Plan for 2024-2026
Relevant legislation	• Law No. 678/2001 on preventing and combating human trafficking • Law No. 286/2009 on the Criminal Code (Articles 210 and 211 criminalise human trafficking) • Government Decision No. 1238/2007 approving the national standards for specialised services for assistance and protection of victims of human trafficking • Government Decision No. 49/2011 for the approval of the Framework Methodology for multidisciplinary and inter-institutional intervention on exploited children and children at risk of labour exploitation, child victims of trafficking, as well as Romanian migrant child victims of other forms of violence in other countries • Government Decision No. 460/2011 on the organisation and functioning of the National Agency against Trafficking in Human Beings
National Identification and Referral Mechanism (NIRM)	The NIRM, adopted in 2007, was replaced by a new one by Government Decision No. 88 of 31 January 2023.
Trafficking profile	Romania is predominantly a source country for victims of trafficking, but also increasingly a country of destination. 81% of the victims identified in 2020-2023 were female and 48% were children. Most of the identified victims were Romanian girls and women trafficked within Romania for the purpose of sexual exploitation. The main countries of destination of Romanian victims were the UK, Germany, Italy, France and Spain.

I. Introduction

1. Romania was amongst the first countries to ratify the Council of Europe Convention on Action against Trafficking in Human Beings ("the Convention"). Over the years, the Romanian authorities have taken a series of steps to develop a comprehensive legislative, institutional and policy framework for combating trafficking in human beings (THB), as well as to strengthen co-ordination between relevant actors and engage in international co-operation. These efforts have included the adoption of a specific anti-trafficking law and the setting up of specialised bodies, such as the National Agency against Trafficking in Persons (ANITP), comprising 15 regional centres. The authorities have regularly adopted national strategies and action plans for combating THB as well as a National Identification and Referral Mechanism for victims of THB, which has been periodically revised. However, after three rounds of evaluation, GRETA concluded that there were persistent gaps, particularly in victims' access to protection measures, assistance and compensation.

2. On the basis of GRETA's third report, on 4 June 2021 the Committee of the Parties to the Convention adopted a recommendation to the Romanian authorities, requesting them to inform the Committee within a two-year period of measures taken to comply with the recommendation. The report submitted by the Romanian authorities was considered at the 32nd meeting of the Committee of the Parties (16 June 2023) and was made public.

3. On 5 March 2024, GRETA launched the fourth round of evaluation of the Convention in respect of Romania by sending the questionnaire for this round to the Romanian authorities. The authorities submitted their reply to the questionnaire by the set deadline of 5 July 2024.

4. An evaluation visit to Romania took place from 7 to 11 October 2024 in order to hold meetings with relevant governmental and non-governmental actors, collect additional information and examine the practical implementation of adopted measures. The visit was carried out by a delegation composed of:

- Mr Sergey Ghazinyan, Second Vice-President of GRETA;
- Ms Ia Dadunashvili, member of GRETA;
- Mr Mesut Bedirhanoglu, Administrator in the Secretariat of the Convention;
- Ms Asja Zujo, Administrator in the Secretariat of the Convention.

5. During the visit, the GRETA delegation met Mr Valentin Vătăjelu, State Counsellor and National Anti-Trafficking Coordinator, as well as officials from the Ministry of the Interior (including the National Agency against Trafficking in Persons, the General Inspectorate for Immigration, the General Inspectorate of the Romanian Police, and the Border Police and the Gendarmerie), the Ministry of Justice, the Ministry of Labour and Social Solidarity (including the Labour Inspectorate, the National Agency for Employment and the National Authority for the Protection of the Rights of Persons with Disabilities), the Ministry of Family, Youth and Equal Opportunities (including the National Agency for the Protection of Children's Rights and Adoption), the Ministry of Foreign Affairs, the Ministry of Education, the Ministry of Health, the Directorate for Investigating Organised Crime and Terrorism (DIICOT) of the Prosecutor's Office attached to the High Court of Cassation, judges of the Superior Council of Magistracy, officials from the National Agency for the Management of Seized Assets (NAMSA) and the National Agency for Roma. Discussions were also held with a member of the Romanian Parliament's Joint Special Committee of the Chamber of Deputies and the Senate for Combating Human Trafficking, and representatives of the People's Advocate Institution (Ombudsman).

6. The GRETA delegation held separate meetings with non-governmental organisations (NGOs). Meetings were also held with representatives of the International Organization for Migration (IOM), the United Nations Children's Fund (UNICEF), and the United Nations High Commissioner for Refugees (UNHCR).

7. In the course of the visit, the GRETA delegation visited an NGO-run shelter accommodating victims of human trafficking in Bacău, two shelters for children in need of protection (in Brașov and Bacău), as well as the Edmond Nicolau accommodation centre for Ukrainian refugees in Bucharest.

8. The list of the national authorities, NGOs and other organisations with which the delegation held consultations is set out in Appendix 3 to this report. GRETA is grateful for the information provided by them.

9. GRETA wishes to place on record the co-operation provided by the Romanian authorities and in particular by the contact person appointed to liaise with GRETA, Ms Delia Negraru, Specialist Officer at the ANITP.

10. The draft version of the present report was approved by GRETA at its 53rd meeting (24-28 March 2025) and was submitted to the Romanian authorities for comments. The authorities' comments were received on 12 June 2025 and were taken into account by GRETA when adopting the final report at its 54th meeting (30 June - 4 July 2025). The report covers the situation up to 4 July 2025; developments since that date are not taken into account in the following analysis and conclusions. GRETA's conclusions and proposals for action are summarised in Appendix 2.

II. Overview of trends and changes in the legislative, institutional and policy framework for action against human trafficking

11. Romania is predominantly a country of origin of victims of THB and is also increasingly becoming a country of destination. The number of victims identified by the Romanian authorities in the period 2020-2024 (a total of 2 662, including 596 in 2020, 505 in 2021, 500 in 2022, 451 in 2023, and 610 in 2024) has declined compared to the previous evaluation periods.[2] Most identified victims were female and nearly half were children. Sexual exploitation remained predominant (73.6% of the victims), followed by labour exploitation (14%), forced begging (6.4%), and forced criminality (0.3%) (see the table in Appendix 1 for detailed statistics). The majority of the identified victims (68%) were Romanian nationals trafficked within Romania. As regards Romanian victims trafficked abroad, the main destination countries were the United Kingdom, Germany, Italy, France and Spain. The number of foreign victims identified in 2020-2024 in Romania was 36 (1 in 2020, 1 in 2021, 2 in 2022, 8 in 2023, and 24 in 2024). The majority were nationals of Pakistan (12), the Republic of Moldova (4), Columbia (3), and Bangladesh (3).

12. As regards emerging trends, traffickers are increasingly using the Internet and social media to recruit victims and advertise commercial sex services. Sexual exploitation has shifted toward digital platforms, including sex videochats and the production and online distribution of explicit sexual content,[3] a trend that has intensified since the COVID-19 pandemic. Additionally, there has been an increasing number of foreign victims trafficked for the purpose of labour exploitation.

13. The legislative framework relevant for action against THB has substantially evolved, reflecting some of GRETA's previous recommendations. Law No. 202 of 26 June 2024 increased the sanctions for human trafficking[4] and amended Article 91 of the Criminal Code (CC) to prohibit courts from suspending prison sentences for the offences of slavery (Article 209), trafficking in human beings (Article 210) and child trafficking (Article 211). A law adopted on 30 October 2024 added forced criminality to the forms of exploitation related to THB under Article 182 of the CC[5] and removed the provisions of the CC concerning the offence of pimping by coercion or against a child as these overlapped with the existing provisions on THB for sexual exploitation. Further, Law No. 186 of 1 July 2021 abolished the statute of limitations for slavery, THB and child trafficking. Additionally, Article 266 of the CC was amended by the inclusion of a new provision imposing six months to two years' imprisonment for failing to report offences of trafficking and exploitation of vulnerable persons or violations of sexual freedom and integrity committed against a child.

14. Furthermore, several legislative changes were made to improve victim protection and access to services and compensation. Law No. 217 of 10 July 2023 amended the Criminal Procedure Code (CPC) to strengthen safeguards against re-victimisation and explicitly include adult and child victims of trafficking amongst the categories of persons entitled to mandatory legal assistance. Law No. 230, adopted in 2022, entitles THB victims to claim state compensation for moral damages, in addition to material damages. A law promulgated on 4 November 2024 expanded access to free legal aid and state compensation and enhanced the protection of personal data of victims in judicial proceedings. Additionally, Article 20 of Law No. 678/2001 was amended in May 2023 to specify that THB victims cannot be punished for engagement

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2 By way of comparison, the number of identified victims of THB was 1,041 in 2012, 896 in 2013, 757 in 2014, 880 in 2015, 756 in 2016, 662 in 2017, 497 in 2018 and 698 in 2019.

3 The number of cases of exploitation through pornography represented more than half (52%) of the cases of sexual exploitation of child victims in 2023, similar to the previous year. See ANITP's 2023 Anti-Trafficking Report.

4 The law increased the penalties for THB (Article 210 of the CC) from 3-10 years to 5-12 years, child trafficking (Article 211 of the CC) from 5-10 years to 7-15 years, aggravated THB from 5-12 years to 7-15 years, and aggravated child trafficking from 5-12 years to 10-20 years.

5 Prior to the amendment, Article 182 of the CC defined exploitation as follows: "forcing a person to carry out work or tasks; enslavement or other similar procedures implying deprivation of freedom; forcing persons into prostitution, pornography, in view of obtaining and distributing pornographic material or any other types of sexual exploitation; forcing into mendicancy and illegal collection of body organs, tissues or other cells".

in prostitution or begging. GRETA welcomes these legislative amendments, which are further explained in later parts of the report (see paragraphs 134, 138, 141, 165, 166, 172, 174 and 177).

15. As for the institutional framework, in January 2022, the co-ordination of the Monitoring Committee for the Implementation of the National Strategy was moved from the State Secretary of the Ministry of the Interior to the State Counsellor of the Prime Minister's Chancellery, who now serves as the National Anti-Trafficking Coordinator. In January 2023, the Interministerial Committee for Strategic Intersectoral Coordination of the Fight against THB was established by Prime Minister's decision, replacing the previous Monitoring Committee. The Committee's role is to support the national strategy's implementation and to determine the necessary measures to meet its objectives. Chaired by the State Counsellor, it includes representatives of relevant ministries at State Secretary level.[6] NGOs assisting trafficking victims participate in all Interministerial Committee meetings as permanent invitees. The Committee is supported by a Technical Secretariat managed by the State Counsellor's Office and the ANITP.

16. The ANITP, subordinated to the Ministry of the Interior, has 15 regional offices and employs 73 staff, including police officers, sociologists, psychologists and social workers.[7] Further, each county has an inter-institutional anti-trafficking team, comprising representatives of the local authorities and the local branches of DIICOT and the Department for Combating Organised Crime (DCCO), the Immigration Service, the Labour Inspectorate, the Directorate for Social Assistance and Child Protection (DGASPC), as well as specialised NGOs. These teams are convened at least annually by the county prefect, with secretarial support from the relevant ANITP regional office.

17. In 2022, a Working Group for the Prevention of Sexual Exploitation, Abuse and Risks of Trafficking of Ukrainian refugees was established at the Prime Minister's Chancellery. The group developed the National Action Plan for Prevention of Exploitation, Sexual Abuse and Risks of THB[8] and monitors its implementation.

18. In December 2023, the Romanian Parliament established a Joint Special Committee of the Chamber of Deputies and the Senate for Combating Human Trafficking. Most of the previously mentioned legislative amendments were initiated by this Committee. GRETA welcomes the establishment by the Romanian Parliament of the Joint Special Committee for Combating Human Trafficking and trusts that its functioning will continue in the future.

19. During the reporting period, Romania implemented the National Strategy against Trafficking in Human Beings for 2018-2022, accompanied by National Action Plans for 2018-2020 and 2021-2022. An independent consultant, funded by the international NGO International Justice Mission (IJM), evaluated the Strategy's implementation. The evaluation report highlighted positive developments, such as increased awareness of THB, improvements in the legal and institutional framework, better inter-institutional co-operation, enhanced victim services with a focus on trauma-informed care, stronger international co-operation, and more consistent training for institutional actors. The report also provided recommendations, including adapting the legal framework to combat technology-facilitated THB, preventing labour exploitation of foreign nationals, collecting victim feedback on service quality, improving data collection, clarifying reporting obligations for certain professions (e.g., medical doctors), enhancing

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6 The Ministry of Internal Affairs, the Ministry of Justice, the Ministry of Labour and Social Solidarity, the Ministry of Health, the Ministry of Foreign Affairs, the Ministry of Education, the Ministry of Economy, the Ministry of Entrepreneurship and Tourism, the Ministry of Finance, as well as the Ministry of Family, Youth and Equal Opportunities.

7 At the time of GRETA's fourth evaluation visit, ANITP had 93 allocated positions: 48 at the central office and 45 in the 15 regional offices. However, actual staff numbers have declined over the years: 82 positions were filled in 2021, 81 in 2022, 78 in 2023 and 73 in 2024. Staffing shortages were particularly evident in the regional offices. In Bucharest, only one of three allocated positions was occupied, while in Brașov (which covers Brașov and Covasna counties), two out of three positions were filled. The authorities noted that Romania's public sector faces an average vacancy rate of 20%.

8 The action plan was approved by Government Emergency Ordinance No. 100/2022 at the end of 2022.

institutional capacity to evaluate anti-trafficking activities, further co-operation with NGOs, and training judges on a trauma-centred approach.[9]

20. The new National Strategy against THB (2024-2028) and the accompanying National Action Plan for 2024-2026 were approved by the Government on 16 May 2024, more than two years after the expiration of the previous national strategy (2018-2022). The new Strategy includes five general objectives and 18 specific objectives across four pillars: prevention, protection, punishment, and partnership. The Action Plan takes into account GRETA's previous recommendations, as well as those from the evaluation of the previous Strategy. It outlines 104 actions, including to reduce the risks of online trafficking, improve corporate accountability, strengthen the judicial capacity, enhance interinstitutional co-operation, improve the funding of victim assistance and develop services for foreign victims. It also aims to improve proactive victim identification, strengthen victim protection measures in judicial proceedings, enhance data collection, ensure sufficient resources for ANITP and make the work of the county anti-trafficking teams permanent. Each action specifies the responsible institutions, timelines, expected results, and evaluation indicators. However, there is no budget specified for the implementation of the actions. While welcoming the adoption of the new Strategy and Action Plan against THB, GRETA stresses the importance of ensuring continuity in the adoption of policy documents.

21. The 2024-2026 Action Plan envisages the creation of a consultative group of trafficking survivors to advise the Interministerial Committee for Strategic Coordination of the Fight against THB. A working group held a meeting in January 2025 to discuss the steps necessary for setting up and operationalising the survivors' consultative group. The development of guidance on the key principles to be followed is currently underway with the active participation of civil society organisations. GRETA welcomes this initiative, stresses the importance of taking into account the experiences and views of survivors to support the design and implementation of measures to prevent trafficking and protect victims, and refers to the ODIHR Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils as well as ICAT's Issue Brief on Ensuring Ethical Survivor Inclusion.[10]

22. The implementation of the National Strategy against THB is followed up by ANITP, which publishes annual reports.[11] As noted in GRETA's third report, Government Decision No. 460/2011 was amended in March 2018 to change ANITP's role from an equivalent mechanism to that of a National Rapporteur. GRETA reiterates its position on the need for structural separation between monitoring and executive functions to ensure an objective evaluation of anti-trafficking efforts. GRETA also emphasises the importance of an independent evaluation of the National Strategy and Action Plan as a tool for assessing the impact of activities and planning future policies and measures. Reiterating its previous recommendations, GRETA considers that the Romanian authorities should examine the possibility of designating as a National Rapporteur a separate organisational entity or another existing independent mechanism for monitoring the anti-trafficking activities of State institutions.

23. The informal NGO network "ProTECT Collaborative Platform", established in July 2020, was granted the legal status of federation of associations under the name "ProTECT Federation". It currently includes 25 NGOs working in the area of combating human trafficking and supporting victims.[12]

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9 Marcel Chiranov, Qualitative assessment of implementation and data analysis: National Strategy against Trafficking in Human Beings for 2018-2022, pages 61-62 (in Romanian).

10 OSCE/ODHIR, Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils (NSTACs), 2024; ICAT, Ensuring Ethical Survivor Inclusion, Issue Brief, 2025.

11 ANITP's reports are accessible at its website: https://anitp.mai.gov.ro/subiectele/cercetare/rapoarte-anuale/

12 https://traficdepersoane.ro

III. Addressing vulnerabilities to trafficking in human beings

1. Prevention of trafficking in human beings

a. Introduction

24. Prevention is crucial in combating human trafficking. Article 5 of the Convention therefore requires States Parties to establish and/or strengthen effective policies and programmes to prevent THB in co-ordination between relevant public agencies, non-governmental organisations and other elements of civil society. Such policies and programmes should have a particular focus on persons vulnerable to trafficking and professionals concerned with human trafficking, and shall include research, information, awareness-raising and education campaigns, social and economic initiatives and training programmes. In the development and implementation of prevention measures, States Parties are required to promote a human rights-based approach and to use gender mainstreaming and a child-sensitive approach, taking specific measures to reduce children's vulnerability to trafficking. Furthermore, Article 5 of the Convention requires States parties to take measures to enable migration to take place legally. In addition, Article 6 of the Convention places a positive obligation on Parties to adopt measures to discourage the demand that fosters all forms of exploitation of persons which leads to trafficking.

25. According to the Romanian authorities, the main vulnerability factors for THB are poverty and a difficult family situation. Victims often come from rural areas, dysfunctional or single-parent families, or residential institutions. Some 20% of victims were in residential institutions, foster care or under the care of relatives at the time of recruitment. Most victims (70%) were recruited by people they knew, such as friends, neighbours or relatives. Children in institutions, persons engaged in prostitution, persons with disabilities, Romanian nationals migrating abroad for work and migrant workers in Romania are particularly vulnerable to trafficking.

26. The National Action Plan for 2024-2026 outlines several measures to prevent exploitation among vulnerable groups, specifically mentioning pupils, institutionalised children, Romanian communities abroad and third-country nationals working in Romania. These measures involve awareness-raising, strategies to reduce demand, vocational training for vulnerable groups, incentives for employers, actions to reduce school dropout, the creation of a national database for vulnerable children, and enhanced state oversight over sex videochat companies and massage parlours.

27. During the reporting period, ANITP signed 53 co-operation protocols with public and private sector actors and NGOs and organised numerous information and awareness campaigns.[13] For example, in January 2024, ANITP and the General Inspectorate for Immigration launched three national campaigns to prevent trafficking, funded by the Norwegian Financial Mechanism. Each targeted a specific form of trafficking (sexual exploitation, labour exploitation, forced begging), with materials distributed online and offline in multiple languages (Romanian, English, Ukrainian, Arabic, Nepali and Bengali). Campaigns also utilised targeted social media promotion to reach specific audiences. For example, the campaign "Prison is not just between bars!" (July-December 2022) targeted possible users of services provided by victims of THB. In July 2023, the campaign "Road to Freedom", featuring a trafficking survivor, became the first national initiative to use survivor experiences. While the authorities have assessed the impact of some of the above-mentioned campaigns using pre- and post-activity questionnaires, NGOs noted that in most cases no impact assessment was conducted. In their comments to the draft GRETA report, the authorities stated that while impact assessment was already conducted in the past, the current Strategy against THB formally integrates it as a standard requirement, ensuring that all stakeholders involved in awareness activities consider evaluation as a core element of the process. To support this, pre-and post-activity questionnaires are used, both in physical format and via digital platforms.

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13 For more information on awareness-raising campaigns on THB, see the reply to the questionnaire as well as the ANITP's Anti-Trafficking Reports for 2021, 2022 and 2023.

28. Several studies on human trafficking were conducted during the reporting period. For example, in 2024, the NGO Justice and Care Romania examined the characteristics of child trafficking in Romania, levels of awareness about this phenomenon and key areas of vulnerabilities.[14] Another 2024 study analysed recruitment methods and vulnerabilities to human trafficking resulting from the legislation (see paragraphs 55-56).[15] Additionally, two analyses were conducted in 2024 of the risks of human trafficking and exploitation faced by Ukrainian refugees in Romania.[16] A 2023 study by the Centre for Advocacy and Human Rights focused on the assistance and protection of child victims of trafficking.[17] GRETA welcomes the research carried out in Romania into different aspects of THB.

b. Measures to prevent the vulnerability of specific groups to trafficking in human beings

29. This section examines the preventive measures taken with regard to certain vulnerable groups on the basis of the information provided by the Romanian authorities as well as non-state actors. GRETA underlines that not every individual belonging to one of these groups is vulnerable to trafficking *per se*, there are usually additional vulnerability factors involved. The different groups selected should be viewed with due regard to the complexity and intersectionality of vulnerabilities to trafficking.

i. Children

30. In its previous reports on Romania, GRETA highlighted the vulnerability to THB of Roma children, children living on the streets and children in institutional care or transitioning out of institutions.[18]

31. High school dropout rates,[19] particularly in rural areas, remain a serious concern in Romania, often driven by poverty[20] and social exclusion. GRETA notes that most identified child trafficking victims (aged 14-17) in 2018-2022 had only completed secondary school (eight years of schooling in Romania),[21] highlighting a strong link between school abandonment and trafficking recruitment.

32. Nearly half of identified victims of THB were girls trafficked for sexual exploitation. Most of them came from rural areas and low-income families. The 'loverboy' method is the dominant recruitment tactic, targeting increasingly younger victims.[22] NGO representatives stressed the risks created by social media and the need to raise awareness of parents and school staff.

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14 Radu Cinpoes, Missing Links and Hidden Chains - Child Trafficking in Romania, 2024.

15 Silvia Tabusca, *General Aspects Relating to Human Trafficking in Romania: Constitutional Rights, Legislative Vulnerabilities, and Recruitment Methods*, Universul Juridic Publishing House, 2024 (in Romanian only).

16 International Justice Mission, Ukrainian Refugees Flows in Romania and Human Trafficking Trends, October 2024; K. Sharapov, Vulnerability to Trafficking in Persons In the context of the War in Ukraine. Findings from Poland and Romania, August 2024.

17 A. Gulei, M. Niță, D. Pîrvu, A. Vieru, O. Ursache, A.R. Roșca, *Assistance and protection of children victims of human trafficking in Romania*, 2023.

18 See paragraphs 103-104 of GRETA's first report, paragraphs 65-67 of GRETA's second report and paragraphs 179-180 of GRETA's third report.

19 Romania has one of the highest percentages of early leavers from education and training in the EU, with 15.6% in 2022 compared to the EU average of 9.6%, according to Eurostat. See https://www.unicef.org/media/152056/file/Romania-2023-COAR.pdf

20 According to Eurostat's 2022 statistics, Romania has the highest rate of children at risk of poverty or social exclusion in the EU (41.5%), nearly twice as high as the EU average (24.7%). See https://www.unicef.org/media/152056/file/Romania-2023-COAR.pdf

21 Statistics on child victims identified in 2018-2022 show that in the 14-17 age group (ages that align with high school in Romania) the largest category consists of children who attained only secondary school education, totalling around 561. This is more than double the number of children in high school, which is approximately 226. The third largest category among 14-17-year-olds is those with only primary school education (four years of schooling), numbering around 128.

22 Out of 1 310 child victims identified between 2018 and 2022, 63 were 12 years old, 134 were 13, 191 were 14, 259 were 15, 252 were 16, and 270 were 17 years old. See Radu Cinpoes, Missing Links and Hidden Chains - Child Trafficking in Romania, 2024, page 16.

33. As noted in paragraph 25, a significant number of identified trafficking victims were previously in institutional care,[23] which highlights the need for stronger child protection measures. NGOs report that childcare institutions staff are overwhelmed and lack training on trafficking risks. In 2022, the authorities prosecuted six officials, including a mayor, for trafficking-related crimes involving six child victims, one as young as 12. In one case, two county Child Protection Services (CPS) employees forced four children into agricultural labour and subjected them to repeated abuse and unsafe living conditions.

34. According to official statistics, as of December 2024, a total of 9 579 children were benefiting from special protection measures in residential care services. Of these, 7 765 were placed in public residential services and 1 814 in private facilities. Children in residential care as well as those placed under other forms of special protection are monitored by case managers who are required to review each child's individualised protection plan every three months. Residential services for children are regularly inspected by the National Agency for Payments and Social Inspection and may also be subject to ad hoc monitoring by the control body of the National Authority for the Protection of Child's Rights and Adoption. Article 129 of Law No. 272/2004 on the protection and promotion of children's rights provides for one-time allowances for children and young people transitioning out of state care (equivalent to one minimum gross basic salary for children and three minimum gross basic salaries for young people). Those who can demonstrate that they are enrolled in an educational programme or are employed may apply to continue receiving special protection or a monthly allowance of approximately EUR 600 until the age of 26.

35. Since January 2022, a toll-free national helpline (119) has been available for reporting child abuse, neglect, exploitation and trafficking. Managed by the General Directorates for Social Assistance and Child Protection (DGASPCs), it enables real-time intervention by child protection specialists. Each DGASPC has a team of three to four staff handling calls and, when necessary, dispatching child protection specialists to the location from which the person calls. From January 2022 to May 2025, 52 calls were registered concerning suspicions of child trafficking. In such cases ANITP is informed.

36. In September 2023, the Ministry of Education issued guidance on handling cases of violence, which includes a chapter on identifying and responding to suspected human trafficking involving pupils. The guidance was distributed to all schools, with awareness campaigns conducted in October 2023 and in March and October 2024.

37. During the reporting period, several projects supported by ANITP and NGOs were implemented in schools to raise awareness of human trafficking. Notable examples include the projects "Talking to Young People" and "I Am an Informed Parent" in Brașov (the latter providing parents with a list of trafficking indicators). ANITP also established protocols with NGOs and schools for joint child trafficking prevention activities. For instance, in collaboration with Save the Children, ANITP launched two campaigns: "Inform Yourself to Be Protected," raising awareness of child trafficking, and "Work Abroad Safely," aimed at safeguarding children with parents working abroad. Additionally, ProTECH NGO platform members conducted initiatives on online safety, child trafficking risks and harmful cultural practices like child/early marriage. The Romanian authorities also highlighted campaigns aimed at reducing demand for trafficking services, including the international campaign "Without Clients, There's No Trafficking!" with the participation of ANITP with the Romanian and Spanish police.

38. ANITP and partner institutions have continued sensitising professionals involved in preventing and detecting child trafficking, including social workers, medical staff, NGO workers, law enforcement and judicial officials, priests, prison staff, European emergency number (112) operators, transport and hospitality employees. For example, in 2023 and 2024, the NGO European Centre for Legal Education and Research (ECLER) provided training to over 4 000 professionals (mainly school psychologists, teachers

[23] For example, 15% of the 451 victims identified in 2023 (both adults and children) were either in residential institutions (60 victims) or in foster care (9 victims) before being trafficked. Chera, D. 2024 ANALIZĂ SUCCINTĂ PRIVIND TRAFICUL DE PERSOANE ÎN ANUL 2023 (https://anitp.mai.gov.ro/ro/docs/studii/Analiza_succinta_victime_2023.pdf) (in Romanian). For a recent case of labour trafficking of persons coming from Romanian foster care centres in Hungary, see Trafficking ring preyed on vulnerable Romanian teens - police.

and social protection staff). In 2024, ANITP organised specialised training sessions attended by 192 social workers and psychologists, 541 medical staff and assistants, 3 229 teachers and educational counsellors, 127 representatives of the DGASPC, and 251 parents and foster carers. Additionally, in 2024, the National Authority for the Protection of Child's Rights and Adoption (ANPCRA), in collaboration with the eLiberare Association, developed the Practical Guide for the Identification and Referral of Child Trafficking Cases, aimed at child protection professionals. To support the guide's dissemination, training sessions and regional inter-institutional meetings were held in six counties (Dolj, Botoșani, Vaslui, Bacău, Brașov and Ialomița) as well as in District 2 of Bucharest, in partnership with UNICEF. A total of 117 professionals, including social workers, psychologists and other frontline staff, attended these sessions in person.

39. Despite the commendable prevention efforts outlined above, according to civil society actors met by GRETA, children's understanding of human trafficking risks remains low, as confirmed by recent surveys.[24] A 2024 study by the NGO Justice and Care Romania[25] found that school campaigns created some knowledge among children, but this appears to be very superficial and may lead to a false sense of security. Many children perceive trafficking as a distant threat, unlikely to affect them. Campaigns tend to focus, for logistical reasons, on urban areas and do not respond to the particularities of rural conditions. Insufficient human and financial resources prevent ANITP and NGOs from conducting regular prevention activities, while local authorities and schools lack the expertise and tools to address trafficking effectively.[26] Only about 200 of the 2 200 municipalities have a multidisciplinary community team to conduct outreach activities. Recently, the NGO Justice and Care Romania partnered with the National Association of Rural Communes to enhance local authorities' capacity to combat child trafficking and improve coordination with central authorities.

40. GRETA urges the Romanian authorities to strengthen their efforts to improve the prevention of child trafficking, in particular by:

- increasing the resources of the child protection services so that they can play an effective role in the prevention of trafficking of children and the management of cases of children at risk;

- implementing social and economic measures and programmes aimed at supporting children in vulnerable situations, including children living in and leaving institutional care.

41. Furthermore, GRETA considers that the Romanian authorities should:

- ensure effective and regular inspections of child residential institutions and their monitoring by independent bodies to prevent exploitation of children;

- continue providing training on trafficking in human beings to child welfare professionals and other professionals working with children, such as teachers;

- strengthen their efforts to raise public awareness, especially in rural areas and among children living in residential care, about the risks and different manifestations of child trafficking, including child and forced marriages, and exploitation of begging;

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24 For example, according to a 2023 survey conducted by the NGO eLiberare on young people's perception of online risks, 37% of respondents believe that having online conversations with strangers is acceptable and many people do it, 29% said they would talk to strangers online, 6% consider the exchange of personal sexy photos between classmates acceptable, 20% consider that activity on online platforms such as OnlyFans, where sexy content is remunerated, is acceptable and widely practiced, and %11 of respondents have heard and know cases involving 'loverboy' modus operandi.

25 Radu Cinpoes, Missing Links and Hidden Chains - Child Trafficking in Romania, 2024, pages 27-29 and 37.

26 For example, in Brasov, there is one school psychologist per 800 children.

- establish safe, age-appropriate, and accessible complaint mechanisms in residential care facilities for children and actively promote children's understanding and use of these mechanisms through ongoing communication and support;

- intensify their efforts to combat school dropouts as a preventive measure against child trafficking.

ii. Disadvantaged minorities

42. GRETA's third report on Romania highlighted major barriers to the integration of the Roma community in Romania, including poverty, discrimination, social marginalisation, school segregation and dropouts, social housing shortages, forced evictions and unequal access to employment.[27]

43. A 2021 EU Agency for Fundamental Rights (FRA) survey found that most Roma in Romania live below the poverty line and that school dropouts and segregation in education remain widespread.[28] Employment rates are low, with only 41% of working-age Roma (ages 20-64) in paid jobs (compared to 71% of the general population) and 59% of Roma youth (ages 16-24) neither working nor studying (compared to 15% of the general population). Housing deprivation[29] affects 70% of Roma, compared to 28% of the general population. Roma also face persistent discrimination in education, employment, healthcare and housing.

44. Romania's Strategy for the Inclusion of Romanian Citizens Belonging to the Roma Minority (2022-2027)[30] covers many areas relevant to preventing THB, such as education, employment, health and housing. It also envisages the inclusion of the Roma community in information campaigns regarding THB. Designed by the National Agency for Roma, which oversees its implementation, the Strategy relies on other state bodies for execution. For instance, the National Agency for Employment (NAE) runs annual job programmes in areas primarily inhabited by Roma, but official data shows limited impact, with 4 787 Roma employed through these programmes and 8 055 via NAE support between 2021-2023.

45. Official statistics in Romania are not disaggregated by ethnicity and ANITP does not assess vulnerabilities based on ethnic minority status. As a result, its reports do not provide insights into the particular risks of THB in the Roma community. While some initiatives target the Roma,[31] GRETA was informed that no targeted programmes specifically address trafficking risks among Roma communities. In their comments on the draft report, the authorities noted that ANITP carries out prevention initiatives targeting various social groups and geographic regions, with a particular focus on disadvantaged areas and counties with high rates of THB cases. Thus in 2024 some 70 information and prevention activities were implemented in disadvantaged areas and among vulnerable groups, reaching 5 590 persons. These efforts targeted especially minority groups, including the Roma and Hungarian communities, as well as rural populations with limited access to resources.

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27 See paragraphs 73 and 105 of GRETA's first report, paragraph 67 of GRETA's second report, and paragraphs 188 and 189 of GRETA's third report. Romania's Roma population is estimated at 1.85 million (about 8% of the total population). See https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/combatting-discrimination/roma-eu/roma-equality-inclusion-and-participation-eu-country/romania_en

28 According to the survey, in Romania, 53% of Roma live in severe material deprivation (compared to 15% of the general population) and 78% of Roma are at risk of poverty (compared to 23% of the general population). Regarding school dropouts, the percentage of Roma aged 20-24 who had completed at least upper secondary education was 22% in 2021 (compared to 20% in 2016), whereas this rate was 83% for the general population in 2020.

29 The survey uses four dimensions to determine housing deprivation: accommodation is too dark, has problems with humidity, has no shower/bathroom inside the dwelling or has no (indoor) toilet.

30 https://commission.europa.eu/system/files/2022-10/1_1romania_national_roma_strategic_framework_2022_2027.pdf

31 By way of example, the NGO Dorcas Aid conducts awareness-raising and prevention campaigns within disadvantaged minority communities, such as the Roma. It organises Career Guidance and Empowerment workshops for Roma teenagers and has created the Shukhar Centre, a social enterprise designed to empower vulnerable Roma women and teenage girls.

46. While the National Anti-Trafficking Action Plan does not specifically mention the Roma community, it includes relevant actions, including vocational training for vulnerable groups registered with the NAE and community development initiatives, such as appointing formal and informal leaders to identify vulnerabilities at community level.

47. As noted in GRETA's third report, Roma health mediators connect Roma communities with health and social services.[32] While not explicitly tasked with prevention of THB, they play an indirect role by improving access to support systems, similar to Roma school mediators who facilitate education. The National Strategy for Roma Inclusion aims to expand the number of health mediators from 264 to 1 000 by 2027.

48. GRETA welcomes the steps already taken and considers that the Romanian authorities should continue strengthening the prevention of THB among the Roma community, in particular by:

- continuing targeted awareness-raising and outreach work on the risks of human trafficking;
- implementing social, economic and other measures, including by promoting their access to education, employment, housing, healthcare and social services;
- involving Roma organisations in the design and implementation of anti-trafficking policies and measures;
- integrating measures to prevent human trafficking into strategies and action plans for the integration of the Roma.

iii. Migrant workers

49. Human trafficking affects both Romanian nationals emigrating for work[33] and foreign nationals immigrating to Romania for employment. In 2023, Romania had the highest number of citizens living in other EU states, with 3.15 million Romanians (17% of the population) living abroad (mainly in Italy, Germany and Spain).[34]

50. The Romanian authorities have taken steps to reduce the vulnerabilities of Romanians working or seeking employment abroad. In particular, the Romanian Worker's Guide was developed, providing information on the working conditions in 22 countries. The Labour Inspectorate operates two helplines which provide information on the conditions of job mediation and placement abroad, while ANITP runs a helpline in Romanian and English offering information on trafficking risks and safe employment abroad. Between 2021-2023, the ANITP helpline received 10 455 calls, with around 30 per month related to job placement and job offer assessments.

51. The Ministry of Foreign Affairs helps protect Romanian nationals abroad by publishing anti-trafficking materials on Romanian diplomatic missions' websites and sending them directly via the Ministry's apps "An SMS Can Save Your Life" and "Travel Safely". Romanian embassies have a social and employment attaché who advises Romanians on labour rights, with those in the UK, Spain and Italy particularly active in worker outreach. In 2022, ANITP, the Ministry's Consular Department and the Department for Romanians Abroad

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32 See GRETA's third report, paragraph 187.

33 Romania has some of the lowest hourly labour costs in the EU, ranking second lowest after Bulgaria. Wages and labour costs - Statistics Explained

34 EU citizens living in other member states 2023 | Statista

(DRA) held an online meeting with Romanian diplomats and NGOs to enhance co-operation and strengthen the protection of Romanians in the diaspora against human trafficking.

52. Given the high number of Romanian seasonal workers in the EU, in 2021 the Romanian authorities developed an Action Plan for the Information and Protection of Seasonal Workers. To implement it, the Ministry of Labour and Social Solidarity created an information page on its website for Romanian seasonal workers and launched the campaign "Are You a Seasonal Worker Abroad?" promoting legal employment and workers' rights. As part of the campaign, 212 000 leaflets were distributed to seasonal workers heading to Germany, the Netherlands, Hungary, Spain, France, Cyprus, Italy, Greece and Sweden. Additionally, an information ad on seasonal work conditions was broadcast via video and audio media channels.

53. According to the Ministry of Foreign Affairs, London has the highest number of Romanian trafficking victims who have come to the attention of the Ministry (10 in 2021, 260 in 2022, 63 in 2023 and 48 in 2024). In 2023, Romania and the UK signed a joint action plan to prevent and combat trafficking, which included an awareness campaign targeting vulnerable Romanians in London. Additionally, in 2023, the Romanian Ministry of Labour signed a memorandum with Spain to raise awareness among Romanian workers and establish a mechanism for joint inspections to identify vulnerable workers, including trafficking victims.

54. The large emigration of Romanian citizens has driven a rising demand for migrant workers. To address labour shortages, Romania has eased immigration rules, increasing the annual quota for non-EU workers to 100 000 in 2022, 2023 and 2024 (up from 50 000 in 2021). Most migrant workers come from Nepal, India, Bangladesh, Sri Lanka, Morocco and Türkiye, primarily filling short-term jobs in construction and hospitality.[35]

55. Migrant workers in Romania face a high risk of trafficking due to language barriers, deceptive employment practices and inadequate protection. NGOs report that many of them endure poor living conditions, contract violations, excessive working hours and delayed wages. A concerning practice involves employers terminating contracts under false disciplinary claims when workers try to assert their rights. Migrant workers then have 90 days to secure new employment, which is a difficult task due to language and other barriers, or otherwise they face deportation, which forces many of them to accept exploitative working conditions. GRETA was given examples of several cases, including one involving 60 Filipino workers fired for protesting against abuses and subsequently deported.

56. GRETA notes that the current immigration legislation increases vulnerability to exploitation. In 2022, an amendment to Government Ordinance No. 25/2014 required foreign workers who worked less than a year to obtain the employer's written consent to change jobs,[36] effectively binding them to their initial employer and increasing the risks of exploitation. Another issue is that Romanian law requires employers to apply for work permits, but there is no system for migrant workers to verify if their employer submitted an application. As a result, many workers unknowingly become undocumented and continue working under precarious conditions out of fear of deportation.[37]

57. Another gap in Romania's policies to protect migrant workers is the lack of bilateral agreements with Asian countries (except for Vietnam) leaving many foreign workers vulnerable to exploitative migration and labour conditions.[38]

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35 Romania Becoming Top Destination for Migrant Workers Seeking Jobs.

36 This requirement does not apply if the employment contract was terminated at the initiative of the previous employer or following the agreement of the parties or by the resignation of the foreigner on the ground that the employer did not fulfil their obligations resulting from contract.

37 For an example, see La Strada International, Protecting Asian Trafficking Victims in Europe, October 2022, page 24.

38 Ibidem, pages 12 and 25.

58. GRETA was informed that some employers confiscate migrant workers' passports to restrict their movement and facilitate deportation, yet they rarely face consequences for this or for failing to apply for work permit for the workers. The difficulties in regularising undocumented migrants further increase the risks that they face. These issues remain unaddressed due to understaffing and a lack of awareness among relevant authorities, in particular the General Inspectorate for Immigration and the Labour Inspection (see paragraphs 104 and 108).[39]

59. GRETA notes the need to better regulate and monitor the activities of recruitment agencies bringing migrant workers to Romania. Many agencies reportedly engage in abusive practices, charging fees to both the migrants and the employers, coercing workers into exploitative contracts and forcing them to leave Romania without being paid. GRETA was given the example of a Nigerian woman who, after arriving through an agency, faced poor working and living conditions, low wages and agency fees that eventually pushed her into sex work. Further, some migrants arriving on work visas through intermediaries were reportedly rejected by the employers, leaving them undocumented, indebted and vulnerable to exploitation. A 2022 report on Asian trafficking victims founds that despite agencies and companies engaging in exploitative practices, corporate accountability is rare (see paragraph 133). Companies previously sanctioned or blacklisted often rebrand under new names and continue exploiting migrant workers.[40] In their comments on the draft report, the Romanian authorities stated that the Ministry of Labour, Family, Youth and Social Solidarity is preparing a draft law aimed at defining the terms and conditions governing the operation of agencies recruiting workers from non-EU countries for the Romanian labour market. GRETA would like to be kept informed of the outcome of this legislative initiative.

60. Migrant workers have the right to join trade unions, but many are unaware of this right or discouraged by their employers. Civil society actors stressed the need for an online complaint mechanism allowing workers to submit complaints in English (at present, the Territorial Labour Inspectorates accept complaints only in Romanian). Further, while the existing complaint form is supposedly confidential, it requests personal data in the annexe, which raises concerns about the confidentiality of the process.

61. The Romanian authorities and NGOs have conducted awareness-raising activities to inform employers of their legal obligations and migrant workers of their rights and the risks of exploitation. The General Inspectorate for Immigration runs annual campaigns, supported by labour inspectors and the police, to sensitise employers and foreign employees. As part of ANITP's three large-scale national campaigns launched in January 2024 (see paragraph 27), trafficking awareness materials were distributed in the main languages spoken by migrant workers, including English, Ukrainian, Arabic, Nepali and Bengali. In 2023, IOM Romania published an orientation guide to help third-country nationals and beneficiaries of international protection integrate into Romanian society. Following the full-scale invasion of Ukraine by Russia, the NGO eLiberare created a guide for employers to prevent labour exploitation and adopt ethical recruitment practices.[41] The Labour Inspectorate's website also provides information on working conditions in Romania in multiple languages, including Romanian, English, Ukrainian, French, Turkish and Arabic.

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39 See ibidem, page 27.
40 Ibidem, pages 27 and 32.
41 https://www.eliberare.com/prevenirea-exploatarii-prin-munca/

62. Referring to its Guidance Note on combating trafficking for labour exploitation[42] and the Council of Europe Committee of Ministers Recommendation to Member States CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation,[43] GRETA urges the Romanian authorities to take further steps to prevent trafficking for the purpose of labour exploitation, in particular by:

- reviewing the legislative framework on the employment of migrant workers with a view to preventing the abusive termination of contracts by employers and enabling migrant workers to leave an exploitative employment relationship and take up a job with another employer;

- establishing safe reporting and effective complaint mechanisms for foreign workers;

- introducing licencing of recruitment agencies which act as intermediaries for migrant workers arriving in Romania and monitoring fraudulent online job advertisements.

63. Furthermore, GRETA considers that the Romanian authorities should:

- continue enhancing bilateral and international co-operation to ensure the protection of Romanian workers in countries of destination;

- continue raising awareness of Romanians who intend to search for jobs abroad on safe and legal employment, the risks of human trafficking and support services;

- establish bilateral co-operation with countries of origin of foreign workers to prevent their nationals from being exploited in Romania;

- systematically provide information to foreign workers, and especially third-country nationals, in a language they can understand, about the risks of THB for the purpose of labour exploitation, the rights of victims of trafficking and where to access support, as well as on workers' rights under labour laws.

iv. Asylum seekers and refugees

64. According to Eurostat, asylum applications in Romania rose from 1 945 in 2018 to 12 065 in 2022 before dropping to 9 875 in 2023.[44] The largest number of applicants in 2023 came from Bangladesh (2 821), followed by Syria, Pakistan, Nepal and Sri Lanka. There were 933 children seeking asylum, including 159 unaccompanied children.[45] While the number of applications rose, the approval rate for international protection declined. Thus in 2018, 595 individuals were granted protection, compared to 965 in 2023, with most beneficiaries from Syria, Somalia, Afghanistan and Iraq.

65. Asylum seekers are entitled to free accommodation in reception centres during the application process, along with legal, medical and social assistance. The General Inspectorate for Immigration (GII) offers an integration programme for international protection beneficiaries, lasting up to 12 months (with a possible six-month extension). It includes accommodation, three months of material aid, a non-reimbursable monthly allowance of RON 646 (around EUR 130), Romanian language and cultural courses,

42 https://rm.coe.int/guidance-note-on-preventing-and-combating-trafficking-in-human-beings-/1680a1060c.
43 https://rm.coe.int/booklet-preventing-and-combating-trafficking-in-human-beings-for-the-p/1680aa08ef.
44 Statistics | Eurostat
45 Asylum Information Database, Country Report: Romania, 2023 update, 31 December 2023, page 14.

social and psychological support, school enrolment and child allowances.[46] Vulnerable persons, such as unaccompanied children, pregnant women, single parents, victims of trafficking and persons with disabilities, can stay in a reception centre for an indefinite period.[47] International protection beneficiaries have equal rights with Romanian citizens as regards employment, healthcare, education and social housing. However, they are often employed in the hospitality and construction sectors at the minimum wage, which is insufficient for families with multiple children.[48]

66. During the reporting period, the Romanian authorities reportedly continued pushing back asylum seekers and irregular migrants into Serbia without individual assessments of protection needs.[49] NGOs noted that border officials, lacking proper training, failed to inform asylum seekers about their rights.[50] In 2023, the UN Committee for the Prevention of Torture (CAT) highlighted inadequate training of border and immigration officers to enable them to identify trafficking victims, cases of gender-based persecution and other vulnerable asylum seekers. The CAT also raised concern over reports of pushbacks at the border, which in some cases were accompanied by various forms of ill-treatment.[51] GRETA stresses that pushbacks heighten trafficking risks by fostering distrust in officials, forcing asylum seekers into unsafe migration routes and discouraging them from reporting exploitation. Additionally, some interlocutors pointed out that undocumented migrants were deported without risk assessments. Only three NGOs can access immigration detention centres.[52]

67. In response to the Ukrainian refugee crisis, the Romanian Government adopted Government Decision No. 367 on 18 March 2022, granting temporary protection status to Ukrainian refugees. This status provides free access to housing, healthcare, social services and public transportation. From 24 February 2022 to 31 March 2025, there were more than 11 million entries from Ukraine into Romania and 248 494 Ukrainian nationals received temporary protection (24% of whom were children) and 198 international protection (refugee status or subsidiary protection).

68. As noted in paragraph 17, in 2022, the Government adopted an action plan to prevent sexual exploitation, abuse and trafficking of Ukrainian refugees. ANITP distributed information materials in Ukrainian, Russian and English, conducted awareness-raising activities at border crossings and refugee centres, and trained frontline workers on trafficking indicators and the National Identification and Referral Mechanism (NIRM). Other measures included a dedicated refugee helpline, a referral mechanism developed by the ANITP and civil society,[53] and the launch of an official platform (*dopomoha.ro)* providing information on rights and available services as well as trafficking prevention information.

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46 In 2023, 739 adults newly registered in the integration programme, while 761 adults who had registered in 2022 continued participating in the programme. In 2023, 16 unaccompanied children followed the programme. The main countries of origin of participants were Syria, Somalia, Afghanistan, Ukraine and Iraq. For more information on the programme, see ibid., pages 16, 39, 167 and 200.

47 Ibid., page 188.

48 Ibid., page 17.

49 See ibid., pages 28-31 and 35-36; the Border Violence Monitoring Network (BVMN)'s October 2021 submission to the United Nations Committee on Economic, Social and Cultural Rights (CESCR); KlikAktiv, Pro Asyl (Network of German refugee councils), "New developments alongside the Balkan refugee route: illegal push-backs from Romania to Serbia", December 2021; and KlikAktiv, Pro Asyl, Formalising Pushbacks – The use of readmission agreements in pushback operations at the Serbian-Romanian border, 2023. According to KlikAktiv's 2023 Annual Report, in 2023 people on the move continued reporting push-backs from Romania to Serbia but this happened to a smaller extent compared to the previous years.

50 According to interviews conducted by UNHCR Romania with nearly 2 000 asylum-seekers between June 2022 and November 2023, 5% of respondents reported at least one failed attempt to enter Romania. Among them, 80% stated that they were not asked by the authorities whether they wished to apply for asylum. UNHCR Romania, Regional protection monitoring report – Romania 2022/2023, March 2024.

51 UN Committee against Torture, CAT/C/ROU/CO/3/23.08.2023, Concluding observations on the third periodic report of Romania, August 2023, paragraphs 23 and 24.

52 In Romania, asylum seekers whose applications have been rejected are accommodated in two detention centres (Otopeni and Arad) managed by the General Inspectorate for Immigration.

53 https://www.gov.ro/fisiere/stiri_fisiere/ANNUAL_STATUS_REPORT_ROMANIA_DEC_2022.pdf.

69. Several NGOs, including Dorcas Aid Romania, LOGS, Bucovina Institute, ASSOC and AIDROM, supported Ukrainian refugees with legal aid, translation, vocational training and job placement while providing counselling on trafficking and labour exploitation risks. Since April 2023, the NGO eLiberare has been implementing the Kompass Model,[54] in partnership with national and local authorities, which assesses exploitation risks and promotes mid-to-long-term protection strategies. Measures taken as part of this model include providing high-risk refugees with personalised safety plans, reliable contacts and safety passwords, as well as establishing check-in points to ensure their safe travel.

70. Moreover, the authorities have established county task forces for unaccompanied children (by a Joint Ministerial Order of 11 March 2021) and procedures for registering and safeguarding vulnerable Ukrainian children (by a Joint Ministerial Order of 18 March 2022). A computer application was developed for rapid identification and registration of all Ukrainian children.[55] In collaboration with UNICEF, eight Blue Dot Centres were set up at key border crossings, providing children and families with essential services, including education, psychosocial support, healthcare referrals and legal aid. While primarily intended for Ukrainian refugees, asylum seekers from other countries can also access these services. Additionally, the National Authority for the Protection of Children's Rights and Adoption, in partnership with NGOs, has conducted training sessions for DGASPC staff to enhance early detection of abuse, neglect and trafficking, and ensure the provision of support to Ukrainian children.

71. Most Ukrainian refugees in Romania live in private housing. Temporary protection status allows them to work without a permit and access employment services through the National Agency for Employment. However, language barriers, limited availability of childcare and difficulties in diploma recognition limit their job opportunities. Many can only find low-paid, unqualified jobs, often earning too little to cover rent. While Ukrainian refugees receive financial aid for housing and food, the government significantly reduced this support in May 2023.[56] According to civil society, along with declining international donor funding, this decision has increased refugees' vulnerability to exploitation. Some have returned to Ukraine due to financial hardship.[57] NGOs also referred to cases of destitute Ukrainian women resorting to sex videochat services and suspected cases of sexual exploitation and abuses by landlords.

72. Local authorities manage accommodation centres for Ukrainians under temporary protection, primarily housing the most vulnerable (people with disabilities, the elderly, Roma). GRETA visited one of these centres, Edmond Nicolau Centre in Bucharest, which provides a welcoming environment with dedicated and experienced staff. Psychological counselling is provided by Ukrainian specialists, which fosters a sense of trust and security among residents. At the time of the visit, a person from the NGO ADPARE was working at the centre, providing residents with information on trafficking risks. The centre's director noted that while initial support for Ukrainian refugees was strong, funding has since declined, increasing trafficking risks. Budget cuts have led to closures and capacity reductions in refugee centres.

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54 https://kompass.world/wp-content/uploads/2022/05/Kompass-Intervention-Model_c.pdf.

55 This application, called PRIMERO, was developed with support from UNICEF and is managed by the National Authority for the Protection of Children's Rights and Adoption. It has been in use since July 2022. The purpose of PRIMERO is to ensure that each child is registered and referred to child protection authorities for case management or other services relevant to their situation, as well as to facilitate cross-border transfers or tracking if necessary. As of 1 October 2024, a total of 37,302 Ukrainian children had been registered in PRIMERO, and no suspicions of child trafficking had been recorded.

56 See Temporary Protection: The Ongoing Struggle of Romani Refugees from Ukraine in the Czech Republic, Hungary, Moldova, Romania, and Slovakia, June 2024, pages 50 and 51. Emergency Degree No. 96 of 28 June 2024 repealed the previous legislative provisions allowing for lump-sum payments to cover accommodation expenses for Ukrainian refugees. It introduced a new system of support based on differentiated access to the Romanian social protection framework, depending on the duration of stay. Under the new system, Ukrainian citizens with temporary protection who have been registered in Romania for more than three months are granted access to the general social protection system, while those registered for three months or less are eligible for emergency assistance. According to the Degree, foreign citizens or stateless persons arriving from the areas of armed conflict in Ukraine and entering Romania for the first time after 1 July 2024 are entitled, as an initial emergency assistance measure, to accommodation in temporary reception camps and to humanitarian support. Those who are not accommodated in such camps are entitled to a monthly lump sum to cover accommodation costs, but only for a single period of three consecutive months. See ORD DE URGENTA 96 28/06/2024 - Portal Legislativ

57 Temporary Protection: The Ongoing Struggle of Romani Refugees from Ukraine in the Czech Republic, Hungary, Moldova, Romania, and Slovakia, June 2024, page 51.

For example, the Edmond Nicolau Centre, designed for 100 residents, could accommodate only 60 due to funding shortages.

73. Ukrainian Roma under temporary protection are highly vulnerable to exploitation and trafficking due to stigma, discrimination and lack of identity documents, which limit their ability to travel, access social services, secure employment and receive financial aid. Many returned to Ukraine after struggling to obtain essential services, facing repeated delays in state help and experiencing discrimination.[58] Those who remained often live in refugee centres, as financial hardship and prejudice prevent them from finding private housing. Most work in the grey economy due to low education, lack of skills, and, in some cases, missing documents, further increasing their vulnerability.

74. While welcoming the measures taken to prevent trafficking among Ukrainian refugees, GRETA highlights the importance of continuous information on sexual and labour exploitation risks, workers' rights and available support services, as well as enhanced monitoring of workplaces employing Ukrainian refugees. In this respect, GRETA refers to its Guidance Note on Addressing the Risks of Trafficking in Human Beings Related to the War in Ukraine.[59]

75. GRETA urges the Romanian authorities to carry out individualised risk assessment prior to any forced removals, which should cover the risks of trafficking or re-trafficking on return, in compliance with the obligation of *non-refoulement*. In this context, full consideration should be given to the UNHCR's Guidelines on the application of the Refugees Convention to trafficked persons[60] and GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection.[61]

76. Further, GRETA considers that the Romanian authorities should strengthen their efforts to prevent asylum seekers and refugees from becoming victims of trafficking in human beings, in particular by:

- systematically providing information to foreign nationals irregularly crossing the border, in a language they can understand, about the possibility of asking for asylum, the rights of asylum seekers and available support measures;

- providing training on trafficking in human beings to border and local police officers, as well as other relevant officials, with a focus on vulnerabilities that lead to THB and on early detection of cases of THB among asylum seekers;

- improving the social and economic integration of asylum seekers and refugees and facilitating their access to employment and vocation training;

- conducting regular and comprehensive assessments of exploitation and THB risks among asylum seekers and refugees;

- continuing to raise awareness of asylum seekers and refugees of their rights and the risks of human trafficking, including recruitment and abuse through Internet/social networks.

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58 Ibid., page 48.

59 https://rm.coe.int/guidance-note-on-addressing-the-risks-of-trafficking-in-human-beings-r/1680a663e2, accessed 10 July 2024.

60 UNHCR, Guidelines on International Protection: The application of Article 1A(2) of the 1951 Convention and/or 1967 Protocol relating to the Status of Refugees to victims of trafficking and persons at risk of being trafficked, HCR/GIP/06/07,.

61 Available at https://rm.coe.int/guidance-note-on-the-entitlement-of-victims-of-trafficking-and-persons/16809ebf44.

v. Vulnerabilities related to the gender dimension of human trafficking and of persons engaged in prostitution

77. In Romania, most identified trafficking victims are women and girls (between 77% and 88% of the annual number of identified victims in 2020-2024), which highlights the need for measures to promote gender equality, combat discrimination against women, and strengthen women's independence and resilience. Most female victims are exploited in prostitution and pornography. Romania ranks lowest in the EU 2024 Gender Equality Index[62] and has a high rate of domestic violence.[63] The NGO eLiberare carried out the campaign *Dragoste pe Bune* (Love for Real)[64] targeting young girls, which highlighted how emotional vulnerabilities and low self-esteem increase young women's risk of exploitation. As a follow-up, the NGO launched a conversation guide[65] to help parents discuss abuse and trafficking risks with their daughters.

78. The National Agency for Equal Opportunities between Women and Men (ANES), under the Ministry of Family, Youth and Equal Opportunities, coordinates efforts on combating domestic violence and promoting gender equality. It oversees two national strategies relevant to trafficking prevention: the 2022-2027 National Strategy on Equal Opportunities and Combating Domestic Violence (approved by Government Decision No. 1547/2022) and the 2021-2030 National Strategy for Preventing and Combating Sexual Violence – SYNERGY (approved by Government Decision No. 592/2021). There are several support services for victims of domestic violence, including the national emergency hotline for victims of domestic violence, gender discrimination and trafficking, run by the ANES,[66] 42 protected houses, 84 complementary services, 10 sexual violence intervention centres and over 1 477 mobile emergency response teams. The ANES has also conducted regular training for professionals and has launched around 10 national awareness campaigns on domestic and gender-based violence.

79. While Romania's legislation and national strategies provide a solid framework for addressing domestic violence, the 2022 report of the Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) highlighted challenges in implementation.[67] Issues include weak inter-institutional coordination, insufficient local funding for victim support, lack of an integrated data collection system and limited professional capacity. The report also stressed the need for wider dissemination of support service information, expanded specialist shelter capacity and stronger investigation, prosecution and sanctions in violence against women cases.

80. In Romania, prostitution is an administrative offence punishable by fines. Most women in street prostitution are from the Roma community or low-income backgrounds. Long-term involvement in street prostitution often leads to accumulated fines, making it difficult to exit prostitution. While courts can cancel fines once a person is officially recognised as a trafficking victim, in application of the non-punishment principle, this only happens after the end of the criminal proceedings, which can take years (see also paragraph 178). GRETA notes that the criminalisation of persons engaged in prostitution significantly increases their vulnerability to human trafficking by pushing the sex trade underground. This legal approach increases their dependence on exploitative intermediaries, deters them from seeking help from the authorities due to fear of legal repercussions or social stigma, and undermines trust in law enforcement. As a result, access to essential support services diminishes and traffickers can operate with greater impunity.

62 Romania | Index | 2024 | Gender Equality Index | European Institute for Gender Equality
63 Number of female domestic violence offences in Romania 2023 | Statista
64 https://dragostepebune.ro/
65 https://www.eliberare.com/resurse-pentru-parinti/
66 Out of 3 754 calls received by the hotline in 2022, 21 were related to human trafficking. Similarly, out of 9 490 calls received in 2023, 30 were related to human trafficking. However, none of these calls led to the identification of victims of THB or the initiation of criminal investigations.
67 See GREVIO's Baseline evaluation report on Romania, 16 June 2022, pages 6-7.

81. Sex videochats are legal and widespread in Romania, with an estimated 450 000 people working on them.[68] Videochat studios are largely unregulated. GRETA was not informed of awareness-raising campaigns addressing trafficking risks within the sector.

82. While welcoming the measures taken to address violence against women, GRETA considers that the Romanian authorities should take measures to reduce the risks of exploitation of women and girls in prostitution, including by abrogating the administrative offence of prostitution, developing exit programmes for those wishing to leave prostitution, and raising awareness among persons in prostitution about the risks of human trafficking and the support services available to victims.

83. Further, GRETA considers that the Romanian authorities should take measures to address the vulnerability of persons engaged in sex videochats to human trafficking. This should include regulating the sex videochat industry through incorporating measures such as age verification, transparent labour contracts, secure payment systems and accessible mechanisms for reporting coercion and exploitation. Operators who fail to comply with these requirements should be subject to appropriate sanctions.

vi. Persons with disabilities

84. Persons with disabilities[69] are not expressly mentioned in the Council of Europe Anti-Trafficking Convention, but their vulnerability to human trafficking is documented in reports issued by GRETA and other international bodies. Amongst the factors which render persons with disabilities vulnerable to THB are dependence on caregivers or support systems, limited access to information and resources, difficulty communicating or advocating for themselves, stigma and discrimination, as well as lack of or limited access to the labour market and decent work.[70] Reference can also be made to the Committee on the Elimination of Discrimination against Women' (CEDAW) General recommendation No. 38 (2020), which states that women and girls with disabilities are a group particularly vulnerable to being trafficked, and calls on States to provide them with special economic and social support.[71]

85. Romanian legislation provides for measures to empower persons with disabilities, such as unemployment benefits for graduates of special schools for persons with disabilities, subsidies for employers employing graduates with disabilities, as well as allowances and benefits for students with disabilities, persons who upbring a child with disabilities or parents with disabilities. In 2022, Romania introduced legislative amendments (Law No. 140/2022) to reform the guardianship system for persons with disabilities.[72] The government also adopted the National Strategy for Preventing Institutionalisation and Accelerating Deinstitutionalisation (2022-2030) and the National Strategy for the Rights of Persons

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68 România, patria videochat-ului cu acte în regulă. Modelele lucrează 60 de ore pe săptămână pe drepturi de autor

69 According to Article 1 of the UN Convention on the Rights of Persons with Disabilities, persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

70 See OSCE, Invisible Victims: The Nexus between Disabilities and Trafficking in Human Beings, March 2022, p.16.

71 CEDAW, General recommendation No. 38 (2020) on trafficking in women and girls in the context of global migration, paragraphs 40 and 55.

72 https://legislatie.just.ro/Public/DetaliiDocumentAfis/255575. The new Law No. 140/2022 on protection measures for persons with intellectual and psychosocial disabilities brought amendments to the Civil Code and the Code of Civil Procedure, thus abolishing the former system of legal guardianship of persons with disabilities. It introduced three main protective measures for people with disabilities, according to the level of dependence of each person: assistance in the conclusion of legal documents, judicial counselling and special guardianship. Moreover, the law imposed an obligation on courts to review all the cases involving the former guardianship system by August 2025. However, according to the CoE Commissioner for Human Rights, the implementation of the law is hindered by several obstacles including the insufficient training provided to the judiciary and prosecution authorities, the lack of coordinated data allowing the timely identification of persons currently under guardianship (estimated by the Ministry of Justice at about 90 000 persons) and the lack of a clear framework regarding the funding of costs incurred with the compulsory medical examinations prescribed by the law. https://rm.coe.int/communication-in-the-cases-of-centre-for-legal-resources-on-behalf-of-/1680aef859

with Disabilities (2022-2027). The National Authority for the Protection of the Rights of Persons with Disabilities (NAPRPD) oversees their execution with support from the central and local authorities. However, they lack specific measures addressing THB and exploitation of people with disabilities. The National Action Plan on Combating THB includes only one action related to persons with disabilities, focused on training for identifying trafficking victims in residential institutions

86. Despite these efforts, people with disabilities in Romania face significant challenges that heighten their vulnerability to exploitation and trafficking. They often experience social exclusion, financial hardship, limited access to physical spaces, information, justice, employment and healthcare.[73]

87. In their comments on the draft GRETA report, the Romanian authorities stated that ANITP carried out a wide range of awareness and prevention activities among groups facing social or economic difficulties, targeting children and young people in institutional care, children with special needs and those benefiting from special protection measures, aiming to strengthen their ability to identify risks and avoid exploitation. In counties such as Bacău, Neamț and Argeș, ANITP worked in partnership with local organisations to deliver awareness sessions on THB in residential centres, special schools and institutions for children with educational support needs. These initiatives have included educational workshops and the distribution of accessible informational materials, tailored to help children and youth with disabilities better understand how to stay safe.

88. In 2022, around 17 500 persons in Romania lived in residential services overseen by the NAPRPD. Of these, over 16 000 were in residential centres, with the remainder in supported housing. The majority of residents in these centres had learning disabilities (51%) or mental disorders (14%). Beyond NAPRPD-run facilities, persons with disabilities were also placed in psychiatric hospitals, hospitals with safety measures and medico-social units under the Ministry of Health. According to the European Committee for the Prevention of Torture (CPT), long-term institutionalisation in these settings is often the result of insufficient disability-specific services in the community.[74]

89. In 2023, 69 people with disabilities were identified as trafficking victims (64 with mental and 5 with physical disabilities), and in 2022, 33. They were mainly recruited through false promises and exploited for labour or sexual purposes, mostly within Romania. 10 of the victims were children. The sharp increase in 2023 resulted from the identification of 107 trafficking victims, including persons with disabilities, in two state-sponsored residential centres for the elderly. Although these facilities were authorised only for elderly care, they housed persons with disabilities[75] and received state funds for their support. The owners allegedly deprived residents of food and medical care, misappropriated their social benefits and pensions, transferred their property to themselves and forced victims to perform staff duties such as cleaning and washing.[76] Criminal proceedings for THB were initiated against 28 persons (including nurses, administrators, directors and social workers and other officials of the DGASPC) along with two legal entities. 34 out of 107 victims were heard as injured parties or witnesses and were assisted by a lawyer. DGASPC filed a civil lawsuit against the defendants seeking reimbursement of state funds allocated to the residential centres. A second lawsuit was filed on behalf of victims lacking legal capacity, with DGASPC acting as their legal representative, to claim compensation for the harm suffered. In addition, three persons joined the criminal proceedings as civil parties, seeking compensation for the misappropriation of their pensions and property.

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73 See World Bank, Diagnosis of the Situation of Persons with Disabilities in Romania, 2021.

74 The CPT reported that mental health services remain underdeveloped, forcing many people into hospitals due to a lack of community-based care. These hospitals are often understaffed and overcrowded, with poor conditions that undermine the efforts of dedicated healthcare professionals and limit patients' access to proper care and treatment. https://rm.coe.int/1680acbdde, paragraphs 6 and 117.

75 While the residential centres for persons with disabilities are run by the state, residential centres for elderly are mostly private.

76 https://www.dw.com/en/romania-authorities-investigate-abuse-at-care-homes/a-66209699

90. The violations in the first of the two above-mentioned state-sponsored residential centre were identified in Maramureș, Transylvania, by the Centre for Legal Resources (CLR), an NGO authorised to conduct both announced and unannounced visits in public and state-sponsored private residential centres for the elderly and children in alternative care (with or without disabilities). In March 2023, after CLR exposed systematic abuse in residential centres, the Ministry of Labour revoked its collaboration agreement, barring the NGO from further monitoring. Following CLR's reports, media investigations revealed state officials' complicity, including ignored complaints, and falsified documents to hide evidence of abuse or neglect. According to media reports, the residential centres' managers had links to politicians who apparently used their influence to protect them from inspections. The scandal led to the resignation of the Minister of Labour, the dismissal of several social system officials for negligence, and a nationwide inspection ordered by the Prime Minister in July 2023. The inspection resulted in the closure of 99 centres which did not comply with the legislation and fines for others. Around 600 residents were relocated to families, hospitals or other care facilities.[77]

91. GRETA was informed that there are other private and state-run institutions exploiting people with disabilities. For example, in 2023, the People's Advocate Institution filed an *ex officio* complaint against the DGASPC in Giurgiu for alleged "practices of slavery and forced labour for personal purposes." The management at a state-run residential centre in Giurgiu was accused of forcing two young residents with physical disabilities to work for personal gain. Following a visit, the People's Advocate Institution issued recommendations to the centre's director and the local police in Giurgiu launched a criminal investigation under Article 212 of the CC, which criminalises the act of subjecting a person to compulsory labour by imprisonment of one to three years. However, the authorities took no preventive or precautionary measures. The investigation is ongoing. GRETA would like to be kept informed of the outcome of this case.

92. As a positive step, a new regulation adopted in April 2024 mandates the creation of a national register of social service beneficiaries to improve monitoring of persons in care. Developed by the NAPRPD with World Bank support, the register is not yet operational. However, it alone will not prevent exploitation without regular and independent monitoring of residential facilities. Currently, inspections are conducted by social service inspectors from the National Agency for Payments and Social Inspection (under the Ministry of Labour and Social Solidarity), the Council for the Monitoring of the Implementation of the United Nations Convention on the Rights of Persons with Disabilities and the National Preventive Mechanism within the People's Advocate Institution. Social service inspectors are not permitted to conduct unannounced visits, which limits their effectiveness. Only a few NGOs are allowed access to residential facilities. The CoE Commissioner for Human Rights noted with concern the diminished opportunities for NGOs to monitor the situation of persons living in institutions for persons with disabilities.[78] GRETA highlights the essential role of NGOs, as illustrated in the case in Maramureș where abuses were exposed by an NGO. The above-mentioned cases underline the need for stronger independent oversight and safeguards for persons with disabilities, particularly those with cognitive impairments who struggle to report abuse. GRETA also refers to the 2023 concluding observations on Romania of the UN Committee against Torture which expressed concerns over the imposition of administrative requirements that have effectively precluded NGOs from monitoring psychiatric institutions and social care facilities.[79] In their comments on the draft report, the authorities stated that the Ministry of Social Affairs and Health, in partnership with the World Bank, is working on the development of a quality management system for the social services sector, which includes the creation of an independent monitoring mechanism involving NGOs active in the field of human rights or organisations representing service beneficiaries.

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77 https://www.rferl.org/a/romania-corrupt-system-horror-asylums-profit-misery/32627196.html

78 See the Commissioner's report following her visit to Romania in November 2018 and the letter sent by her to the Romanian authorities in 2021: https://www.coe.int/en/web/commissioner/-/romania-the-appointment-of-the-new-leadership-of-the-crpd-monitoring-council-should-be-an-opportunity-to-strengthen-the-protection-of-the-rights-of-pe

79 UN Committee against Torture, CAT/C/ROU/CO/3/23.08.2023, Concluding observations on the third periodic report of Romania, August 2023, paragraphs 17-18.

93. Deeply concerned by numerous systemic obstacles to the effective protection of persons with disabilities in Romania, GRETA urges the Romanian authorities to strengthen their efforts to improve the protection of persons with disabilities from human trafficking, in particular by:

- ensuring regular, effective and independent monitoring of public and private residential centres for persons with disabilities, especially by facilitating specialised NGOs' access to these facilities;

- ensuring that professionals assisting persons with disabilities, including caregivers, legal guardians and teachers, are provided with training on human trafficking with a focus on vulnerabilities that lead to THB;

- further developing access to economic, social and healthcare services for persons with disabilities as a way to reduce their vulnerabilities to human trafficking, including by allocating sufficient funding to county and local authorities to enable them to adequately fulfil their functions related to the protection of the rights of persons with disabilities.

vii. LGBTI persons

94. GRETA emphasises that, in general, LGBTI people are at an increased risk of becoming victims of trafficking, particularly because they are often marginalised in society and excluded from their families, making them ideal targets for traffickers looking for people with less protection. They also face difficulties in accessing the labour market, as employment opportunities are scarce for those who identify outside the traditional gender binary, leading them to work more in the informal economy (including prostitution) or even to accept abusive job offers. In addition, LGBTI people are often over-represented among children in street situations and can be victims of discrimination by the authorities and services, making them less likely to file a complaint or ask for help.[80]

95. LGBTI persons in Romania are vulnerable to THB due to discrimination, stigma and social exclusion, which limit their employment opportunities and increase poverty. In 2024, ILGA-Europe ranked Romania 26th out of 27 EU countries as regards LGBTI rights protection.[81]

96. NGOs reported a rise in online recruitment targeting LGBTI persons for exploitation. Since 2019, ADPARE has assisted two transgender Romanians trafficked for sexual exploitation in the UK and Sweden, a gay Romanian man trafficked for the purpose of sexual and labour exploitation in Denmark, and a gay boy trafficked within Romania. Based on victim testimonies, ADPARE considers many more LGBTI individuals are trafficked but fear of stigma and marginalisation prevents them from seeking help or identifying themselves as victims.

97. DIICOT representatives referred to an ongoing court case involving two homeless gay men recruited due to their extreme vulnerability and exploited by the defendants by offering money and benefits in exchange for sexual services. They housed the victims in various locations and advertised them on a dating app to attract clients. The case, which involves nine defendants, is currently pending trial.

98. GRETA considers that the Romanian authorities should take steps to address the vulnerability of LGBTI persons to trafficking in human beings in close co-operation with civil society organisations.

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[80] https://lac.iom.int/en/blogs/lgbtqi-victims-human-trafficking
and https://2017-2021.state.gov/wp-content/uploads/2019/02/272968.pdf (accessed on 12/2/2025).

[81] Rainbow Map, May 2022.

2. Measures to protect and promote the rights of victims of trafficking

99. Chapter III of the Convention provides for a series of measures to protect and promote the rights of victims. In the first place, it is of paramount importance to identify victims of trafficking correctly as identification enables them to benefit from the other measures and rights contained in the Convention. Pursuant to Article 10 of the Convention, States Parties shall ensure that the authorities competent to identify victims of trafficking have persons trained and qualified to perform the identification, and that these authorities collaborate with relevant support organisations in the identification process. Further, Article 12 of the Convention sets out the assistance measures which States Parties must provide to trafficking victims. Paragraph 7 of this article requires Parties to ensure that services are provided taking due account of the special needs of persons in a vulnerable position as well as the rights of children. Given the relevance of victim identification and assistance to the thematic focus of the fourth evaluation round of the Convention, this part of the report examines the application of these two provisions. Other provisions of Chapter III of the Convention, which have been examined in detail by GRETA during the previous evaluation rounds, are discussed in the chapter of the report entitled "Follow-up issues".

a. Identification of victims of THB

100. On 31 January 2023, the Romanian Government approved a new National Mechanism for Identification and Referral of Trafficking Victims (NIRM)[82] through Government Decision No. 88, replacing the previous NIRM, which had been adopted in 2007 by a joint order of several ministries and public institutions. The adoption of the NIRM by a superior legislative act makes it binding for all state authorities. While under the previous NIRM formal identification was carried out exclusively by law enforcement agencies and judicial authorities, according to the new NIRM, victim identification can be conducted by prosecutors, ANITP, providers of specialised services (such as specialised NGOs accredited to provide services to victims of THB),[83] and, in the case of children, the DGASPC. The new NIRM defines the roles, obligations and responsibilities of different agencies and includes specific measures for child victims and foreign nationals. To support professionals, user-friendly versions of the NIRM were developed, including practical guides for community actors, frontline responders, childcare specialists and medical staff.[84]

101. ANITP operates a dedicated anti-trafficking helpline to which presumed THB cases can be referred. Other helplines receiving trafficking-related calls include the national number 119 for reporting child abuse, neglect and exploitation, and the national emergency line for gender-based violence, run by the National Agency for Equal Opportunities for Women and Men.[85]

102. On 14 April 2021, the General Inspectorate of the Romanian Police adopted a Joint Action Plan to enhance anti-trafficking efforts. The plan mandates regular training for professionals likely to encounter victims, including traffic and border police, school safety staff, immigration officers, teachers and medical personnel. During the reporting period, ANITP, in collaboration with NGOs and international organisations, conducted a series of training activities for police officers, prosecutors, judges, gendarmerie officers, labour inspectors, immigration officers, social workers, school counsellors, priests, medical professionals and transport staff (see also paragraph 130). These training sessions focused on trafficking indicators, victim-centred approaches, interinstitutional co-operation and proactive victim identification. In 2021, 190 training sessions were held, involving 5 000 professionals, while in 2022, 545 sessions involved 10 200

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82 Available at: https://legislatie.just.ro/Public/DetaliiDocument/265243.

83 Under the current NIRM, an NGO qualifies for accreditation if: 1) it has at least three years of experience in anti-trafficking, 2) actively collaborates with at least one public authority responsible for trafficking detection, identification, and referral, and 3) its statute explicitly states its involvement in anti-trafficking efforts.

84 Available at: https://anitp.mai.gov.ro/resurse-profesionisti/

85 The phone line for gender-based violence received 75 THB-related calls in 2022-2024 (21 in 2022, 39 in 2023, and 15 in 2024). Out of 15 390 calls received by the ANITP helpline from January 2019 to December 2023, 71 were related to possible THB cases, of which at least 10 persons were identified as victims of THB.

participants.[86] Further, over 200 training sessions were held in 2023, including nine sessions with the participation of 651 police and border police officers, organised as part of a partnership between the U.S. Embassy and the Romanian police.

103. Civil society actors met by GRETA confirmed increased awareness of trafficking among state officials, but many officials told GRETA that further training was needed, particularly in rural areas. Statistics show that 95% of the victims (1 942 of 2 052 victims) identified in 2020-2023 were detected by law enforcement agencies and judicial authorities,[87] highlighting the limited role of other frontline officials such as labour inspectors and immigration officials. Despite existing procedures and training, border police and immigration officials did not identify any trafficking victims in 2021-2023. Two victims were identified by NGOs among displaced persons from Ukraine.[88]

104. In 2024 there was a significant increase in the number of identified victims of THB for the purpose of labour exploitation and foreign victims of THB (see Appendix 1). Three of these victims were identified by ANITP, five by DGASPCs and the rest by the judicial authorities. Labour inspectors are responsible for supervising both working conditions and irregular employment, which limits safe reporting options for undocumented workers. The Labour Inspection and the General Inspectorate for Immigration cooperate closely in the detection of illegal employment of foreigners, conducting joint inspections in sectors with high number of migrant workers. GRETA notes that when labour inspectors prioritise checking workers' immigration status, this diverts attention from their working conditions. Moreover, the presence of immigration officers during inspections discourages workers from coming forward. NGOs reported that many undocumented migrant workers are deported without proper interviews or identification as possible victims of THB. There is a shortage of labour inspectors and their mandate does not cover the identification of victims of human trafficking, nor are they allowed to inspect the situation of domestic workers in private households.[89]

105. GRETA was informed that insufficient police training on trauma-informed approaches hampers the identification of victims of THB for the purpose of sexual exploitation and results in persons engaged in prostitution being fined. Victims avoid reporting to the authorities due to having ties with the traffickers (including having children with them), fear of retaliation, concerns about their family discovering their situation and accumulated debt from prostitution fines (see paragraph 80).

106. Nearly half of the identified victims of THB since 2020 were children. However, both public institutions and NGOs agree that official statistics do not reflect the reality of child trafficking in Romania as many victims remain unidentified. Most of the identified child victims were sexually exploited. Since exploitation typically occurs in private homes, detection is difficult. Further, social workers and child protection professionals lack awareness of trafficking or view certain situations as "normal" or traditional. This is particularly true for child labour in rural and low-income communities.

107. According to NGOs met by GRETA, the involvement or complicity of public officials, police officers or politicians in THB (see paragraphs 90 and 136) discourage victims from reporting their exploitation. Further, widespread bias against some vulnerable groups, such as Roma, LGBTI persons and migrant

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86 For more details on these activities, see the Reply to the questionnaire, the Reply to the CoP Recommendation and annual ANITP reports.

87 The remaining 110 victims were detected by NGOs (40 victims), ANITP (19 victims), DGASPCs (18 victims), international organisations (18 victims), foreign diplomatic missions in Romania (4 victims) and other persons or institutions (11 victims).

88 They were detected and referred to ANITP in 2023 after allegedly being exploited by a Ukrainian national in domestic work. Their freedom of movement was restricted, their identity and travel documents were confiscated, and they were subjected to physical and psychological abuse, as well as individual threats by the suspect. The two victims were formally identified, a criminal case was opened, and they agreed to cooperate with state authorities. They also received protection and assistance services, including residential support. The investigation was later taken over by the Ukrainian authorities, and the victims returned to Ukraine, where they continued to receive support services through a local NGO. NGOs have detected other presumed cases of labour and sexual trafficking involving Ukrainian refugees. However, these cases are not included in official statistics, as the victims chose not to engage with law enforcement for various reasons, such as fear of their families being informed or concerns about retaliation from traffickers.

89 La Strada International, Protecting Asian Trafficking Victims in Europe, October 2022, page 29.

workers, hampers proactive identification of victims of THB amongst these groups. Encouraging victims to report is difficult, as traffickers frequently threaten their families and the police do not offer family protection (see paragraph 148).

108. While welcoming the adoption of the new NIRM and the guidelines issued to professionals, GRETA is concerned about the persistent barriers to the proactive detection of victims of THB. GRETA notes that the National Anti-THB Strategy, adopted in May 2024, highlights gaps in integrating the NIRM into institutional procedures and inconsistencies between the NIRM and existing protocols of the institutions involved in its implementation. GRETA considers that the Romanian authorities should take further steps to improve the identification of victims of THB, in particular by:

- ensuring that the NIRM is effectively implemented by all institutions involved in it and continuing providing systematic training to all relevant professionals, including border police officers, social workers, child protection officials, labour inspectors, immigration officials, teachers, school psychologists and health-care staff, on trauma-informed approaches, proactive identification of victims of trafficking and the application of the NIRM;

- ensuring that the Labour Inspectorate has the mandate and resources to carry out inspections in all economic sectors and to detect cases of THB for the purpose of labour exploitation, including among migrant workers and in remote locations;

- ensuring that there is a clear separation ("firewall") between immigration enforcement functions and labour inspectorate roles, and that labour inspectors prioritise the detection of persons working in irregular situations who are vulnerable to THB;

- enabling specialised NGOs with experience in identifying and assisting victims of trafficking to have regular access to facilities for asylum seekers and detained migrants.

b. Assistance to victims

109. The lack of shelter places for all victims of trafficking who need safe accommodation for the duration necessary to achieve their recovery was a major issue of concern for GRETA during the preceding evaluations.[90]

110. There are currently four licensed state-run residential centres for victims of THB: three for adults, located in the countries of Dolj (with a capacity of eight places), Iaşi (with a capacity of four places) and Mehedinţi (with a capacity of six places), and one for girls in Cluj County (with a capacity of 10 places). There are plans to open a six-person shelter for adult trafficking victims (both men and women) at the Măgura Service Complex (see paragraph 112). The plan was approved on 28 October 2024 by the Brașov County Council, but the shelter cannot become operational before June 2026 due to ongoing rehabilitation works. GRETA was also informed of efforts to open a residential centre for victims of trafficking and domestic violence in Bucharest. GRETA would like to be kept informed of progress made in the opening of the new shelters.

111. In addition, there are several NGOs operating shelters for trafficking victims. The MLI Foundation runs two residential centres for girls (with a capacity of 10-12 places). ADPARE operates a shelter for high-risk victims in Bucharest. The Betania Association has a safe house in Bacău for eight female victims. The Open-Door Foundation runs a protected shelter for trafficking victims and their children. The FREE

90 See paragraph 119 of GRETA's second report and paragraph 213 of GRETA's third report.

Association offers emergency hotel stays for up to five days, followed by one-year housing assistance, covering the costs and access to specialised services. While the authorities frequently rely on NGOs to assist victims, they rarely provide them with funding. Most of the funding comes from international organisations and is project-based. For example, the Reaching Out shelter for child trafficking victims, visited by GRETA during the previous evaluation, closed in October 2024 due to lack of funds.

112. GRETA was informed that due to the lack of places in specialised shelters for victims of THB, female victims of THB are often housed in domestic violence shelters, while male victims are accommodated in homeless shelters. There are 56 emergency accommodation centres, run by DGASPC, which can provide short-term accommodation to victims of THB. GRETA visited the emergency accommodation centre within the Măgura Service Complex, which provides shelter to victims of domestic violence and children who are victims of abuse, neglect and trafficking. The centre offers psychotherapy, medical care and legal aid. At the time of the visit, it housed five women and their eleven children. Staff comprise psychologists, caregivers, educators, doctors and nurses.

113. GRETA also visited a state shelter in Bacău that accommodates victims of domestic violence and trafficking and their children. In 2022-2024, it housed seven trafficking victims (one in 2022, four in 2023, and two in 2024). Further, GRETA visited an emergency accommodation centre for children, run by the DGASPC in Bacău. It can accommodate up to 10 children (boys and girls), but there had be no victims of THB in the past four years. Children stay briefly at the centre before being placed with foster parents by court order. Bacău has a network of 400 professional foster parents who must undergo training and an examination before becoming foster parents. While caseworkers and managers overseeing them have received training on THB, foster parents have not.

114. Additionally, 29 Crime Victim Support Services under DGASPCs provide social, legal, and psychological assistance to all victims of crime.

115. According to statistics provided by the Romanian authorities, a total of 1 414 victims of trafficking received assistance during the reporting period (289 in 2020, 315 in 2021, 262 in 2022, 241 in 2023, and 307 in 2024). Of these, 981 received assistance from public institutions, 660 from NGOs and 227 from both.[91] Most of them were children. The proportion of victims who received assistance from the total number of identified victims is around 53%, which represents a small increase compared to the proportion of victims assisted in the previous four years (around 48%). The most frequently accessed services were psychological counselling, financial and material support, medical assistance and accommodation.

116. Pursuant to Article 224 of Law No. 95/2006, Romanian victims and victims accommodated in specialised centres, including foreign victims, qualify for public health care for 12 months without having to pay contributions. Despite this provision, NGOs report regional inconsistencies in registering victims in the health-care system. Even victims who have health insurance reportedly often have access only to family doctors, while access to specialised care is limited. As a result, NGOs frequently cover victims' medical expenses.

117. Under the NIRM, when notified of a potential victim, ANITP is responsible for conducting an identification and needs assessment interview before referring the victim to specialised NGOs or public service providers. However, there are no tracking mechanisms to monitor victims' locations and the organisations assisting them. The National Strategy highlights a lack of structured co-operation between public and private service providers. This prevents victims from easily transitioning between state-run and NGO assistance. While the NIRM mandates that the designated service provider assigns a case manager, DGASPC representatives pointed out that a shortage of specialised staff makes case management difficult for trafficking victims.

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[91] By way of comparison, the number of THB victims who received assistance was 166 in 2016, 215 in 2017, 133 in 2018, and 339 in 2019. The majority of the victims were children, who were assisted by child protection authorities. The number of victims who received assistance from NGOs was 88 in 2016, 48 in 2017, 70 in 2018, and 33 in the first half of 2019.

118. In 2022, the Government introduced a voucher system for crime victims to cover their urgent needs (food, accommodation, medication), up to five gross minimum salaries (RON 18 000, equivalent to about EUR 3 700 in 2024). This constitutes an advance payment from the state compensation described in paragraph 172. In June 2023, methodological norms for the implementation of the voucher system entered into force. A commission of two judges from the tribunal in whose jurisdiction the applicant resides grants the vouchers. Despite introducing simplified forms and a list of 49 public and 6 private entities assisting victims to apply for vouchers, GRETA was informed that the process is complex and slow. It requires filling out a detailed report to demonstrate and estimate the victim's urgent needs and to specify locations for each type of expense. Vouchers must be used within 90 days and only for affiliated providers. In their comments on the draft report, the authorities stated that the procedural steps of the mechanism are intended to ensure both accountability and fairness in the use of public funds. They noted that any delays which may have occurred were isolated incidents. In March 2025, the Ministry of Justice issued clarifications regarding the implementation of the voucher mechanism which were communicated to the relevant authorities, including the evaluation commissions, highlighting the urgency of processing applications and the importance of effective coordination. According to official data, the average time from application to voucher issuance was 126 days. As of May 2025, four persons had received vouchers: two victims of THB, one victim of sexual assault, and one victim of child sexual abuse material production and rape. The total value of the vouchers granted was RON 49 000 (about EUR 9 700).

119. GRETA notes with concern that many problems related to victim assistance highlighted in its previous reports have not been resolved. Therefore, GRETA once again urges the Romanian authorities to intensify their efforts to provide assistance to victims of trafficking, regardless of their nationality, in particular by:

- providing adequate, safe and, where appropriate, separate, accommodation to all victims of trafficking who need it, including men;

- ensuring adequate funding and staff to work with victims of THB and facilitate the reintegration of victims of trafficking into society;

- providing adequate and sustainable funding to NGOs to ensure the range and quality of the services delivered by them to victims of THB;

- guaranteeing access to health care to all victims of THB.

120. Furthermore, GRETA considers that the Romanian authorities should:

- strengthen efforts to inform victims as well as public officials and NGOs providing support to victims about the voucher system and simplify the application for vouchers;

- continue to build strategic partnerships with NGOs and other civil society actors in order to ensure the provision of assistance to victims of THB.

3. Substantive criminal law and procedural law

121. The Convention places on States Parties a series of obligations aimed at enabling the effective prosecution of traffickers and ensuring that they are punished in a proportionate and dissuasive manner. As the implementation of these provisions of the Convention was examined in detail by GRETA during the preceding evaluation rounds, given the focus of the fourth round, particular attention is paid to the notion of "abuse of a position of vulnerability" and its application in case-law. Further, GRETA has decided to examine as part of the fourth evaluation round the application of Article 19 of the Convention on the criminalisation of the use of services of victims of trafficking.

a. Notion of "abuse of a position of vulnerability" in the law and case-law

122. Abuse of a position of vulnerability is an integral part of the international legal definition of trafficking in human beings and is central to any understanding of trafficking.[92] It is one of the means by which trafficking acts are committed and is relevant to all forms of trafficking and all exploitative purposes. Abuse of a position of vulnerability occurs when "an individual's personal, situational or circumstantial vulnerability is intentionally used or otherwise taken advantage of, to recruit, transport, transfer, harbour or receive that person for the purpose of exploiting him or her, such that the person believes that submitting to the will of the abuser is the only real or acceptable option available to him or her, and that belief is reasonable in light of the victim's situation."[93]

123. In Romania, Article 210, paragraph 1, letter b, of the CC defines "taking advantage of a person's inability to defend or express themselves or their obvious state of vulnerability" as both a means for committing trafficking in adults (Article 210 of the CC) and an aggravating circumstance for child trafficking (Article 211 of the CC). Additionally, under Article 77 of the CC, committing any offence by "taking advantage of the victim's obvious vulnerability due to age, state of health, infirmity or other causes" is considered an aggravating circumstance.[94] The Romanian authorities stated that proving a victim's vulnerability alone is insufficient; it must also be demonstrated that the defendant knowingly manipulated the victim by exploiting this vulnerability.

124. Romanian criminal law does not define "taking advantage of a person's obvious state of vulnerability." However, the authorities stated that case-law interprets it in line with Article 2 of Directive 2011/36/EU, referring to situations where a person has no real or acceptable alternative but to submit to abuse. Courts have recognised vulnerability based on factors such as young age, material dependence, affective relationships with perpetrators (e.g., parental exploitation), low education, lack of life experience, inability to defend oneself,[95] homelessness,[96] financial hardship,[97] or lack of parental supervision.[98] Courts determine vulnerability case by case, considering psychological, emotional, family, social and economic factors. NGOs noted that prosecutors and victim lawyers increasingly request clinical psychological evaluations to assess pre-trafficking vulnerabilities and the consequences of trafficking on the victims. While these evaluations primarily focus on psychological and emotional factors, they also consider family-related vulnerabilities.

125. From October 2020 to June 2024, abuse of a position of vulnerability was cited in 35 criminal cases involving human trafficking. GRETA was provided with the summary of several judgments on THB issued in the reporting period, which illustrate how victims' vulnerabilities are abused by traffickers. In one case, an unemployed woman with a child suffering from mental disability was forced into prostitution and sex videochat activity.[99] Another case concerned a 15-year-old girl placed in a centre for children who was recruited through the 'loverboy' method and forced into prostitution.[100] In another case, three persons coming from the child protection system were subjected to labour exploitation for many years in Romania, France and Germany (household chores, agricultural work, etc.).[101] In yet another case, several Roma

92 See UNODC Issue Paper *Abuse of a position of vulnerability and other "means" within the definition of trafficking in persons*, United Nations, April 2013, p. 3.

93 UNODC Guidance Note on "abuse of a position of vulnerability" as a means of trafficking in persons in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organised.

94 The application of Article 77 results in the imposition of a penalty up to the special maximum. If this maximum is insufficient, an additional penalty of up to two years' imprisonment may be added. However, the total penalty cannot exceed one-third of the maximum prescribed penalty.

95 Criminal judgment no. 922/2020 of the Iași Tribunal and Criminal judgment no. 464/2019 of the Iași Tribunal.

96 Criminal judgment no. 215/A/2022 of the Bucharest Court of Appeal

97 Criminal judgment no. 464/2019 of the Iași Tribunal

98 Criminal decision no. 428/2021 of the Iasi Court of Appeal

99 Criminal judgment no. 638/2022 of the Bucharest Tribunal

100 Criminal decision no. 624/2022 of 10 June 2022 of the Bucharest Tribunal

101 Criminal decision no. 106/2022 of 11 August 2022 of the Mures Tribunal

families with numerous children and in precarious financial situation were exploited in begging in many European countries.[102] Further, there was a case in which a man formed a sect called 'The Circle' which aimed to recruit young women and their total physical and sexual enslavement. For eight years, he recruited and exploited female students from the Faculty of Arts, as well as high school students with the help of a former employee of the Faculty of Arts and others, including a victim.[103]

126. GRETA was informed of several ongoing THB cases, including a high-profile case involving the British-American influencer and former kickboxer Andrew Tate, arrested in December 2022 along with his brother and two Romanian female associates, and charged for human trafficking, sexual misconduct, money laundering and forming an organised crime group. In December 2024, a Bucharest Court of Appeal ruled that the case could not proceed to trial due to procedural irregularities on the part of the prosecutors, leading to the lifting of the brothers' travel ban. In January 2025, the criminal investigation was reopened in order to address the identified procedural shortcomings and is ongoing. A second investigation led to their indictment in August 2024 on charges including human trafficking, trafficking of children, formation of an organised criminal group, sexual intercourse with a child, influencing statements and money laundering. At the request of the defence, nearly all the victims listed in the indictment were re-interviewed. In their comments on the draft report, the Romanian authorities noted that European Investigation Orders and other international requests for mutual legal assistance had been issued in this case and were awaiting responses. In March 2024, the Bucharest Court of Appeal approved the extradition of the Tate brothers to the UK over separate sexual assault charges (dating back to 2012-2015), to take place after the legal proceedings in Romania have concluded.[104]

127. Further, an NGO reported a 2023 case involving a criminal group led by persons with hearing and speech impairment, who allegedly exploited other persons with the same impairments for forced labour (e.g. selling items on trains), begging and criminal activities (e.g., defrauding Italy's social benefits system). In October 2023, five persons were charged with human trafficking, as well as other offences including blackmail and the formation of an organised criminal group. The case is currently pending before the court.

128. In 2019-2023, the National Institute of Magistracy organised 10 training sessions on THB for judicial practitioners, of which some focused on how traffickers exploit victims' vulnerabilities. GRETA was also informed that in its training for police and prosecutors, ADPARE includes a module on developmental trauma as a key vulnerability factor in victim recruitment and exploitation.

b. Investigation, prosecution and sanctions

129. During the reporting period, there were no major structural changes in the law enforcement and judicial bodies handling THB cases. The Department for Combating Organised Crime (DCCO) under the General Inspectorate of the Romanian Police has a central unit, 15 territorial brigades and 27 territorial services. While DCCO also handles migrant smuggling, THB remains its primary focus, with specialised officers assigned in each territorial unit. In 2023, DCCO received 66 new positions (49 for THB investigations, 17 for financial investigations), increasing its total positions to 316. However, only 250 positions are currently filled.

130. During the reporting period, the Directorate for Investigating Organised Crime and Terrorism (DIICOT) within the Prosecutor's Office attached to the High Court of Cassation was granted exclusive jurisdiction over all THB cases. Previously, it was involved only in complex cases of transnational organised crime. At the time of GRETA's visit, DIICOT had 266 prosecutors (around 100 in Bucharest and the rest

102 Criminal decision no. 955/2022 of 21 December 2022 of the Alba Court of Appeal
103 Criminal decision no. 472/2021 of 26 November 2021 of the Mures Court of Appeal
104 Andrew Tate charged with rape and human trafficking; Influencer Tate brothers, who face human trafficking charges in Romania, arrive in the US - Vancouver Is Awesome

in regional offices). Since May 2021, DIICOT's central structure has included an anti-THB unit with eight positions, of which six were filled. Regional DIICOT offices lack specialised THB prosecutors and GRETA was informed that the recruitment of new prosecutors is challenging.

131. Pursuant to Order No. 27 of 21 March 2020 of the General Inspector of the Romanian Police, prevention and combating of THB and sexual exploitation are mandatory subjects in all police training curricula. Further, training sessions on THB were provided to judges, prosecutors, police officers, and lawyers during the reporting period. For example, on 21-22 September 2022, the National Agency for the Management of Seized Assets organised training on financial investigations and recovering proceeds of crime in THB cases. From 2021 to the first quarter of 2023, the National Institute of Magistracy (NIM) organised five THB training activities for 33 judges and 46 prosecutors. In January 2023, the Ministry of Justice requested that the National Union of Bar Associations and the NIM consistently include THB-related topics in their training programmes. In addition, from September 2021 to June 2022, several regional training sessions for police officers and prosecutors were conducted under the project "Strengthening Proactive Criminal Justice Response to THB in Romania," implemented by the IJM. In 2024, ANITP delivered training to 612 police officers, 197 gendarmes, 22 officers from the Romanian Border Police and the General Inspectorate for Immigration, and 90 local police officers. These sessions focused on enhancing the capacity of frontline responders to identify victims of trafficking, recognise behavioural and situational indicators, and apply a trauma-informed approach when interacting with potential victims.

132. According to statistics provided by the Romanian authorities, 2 714 investigations for THB offences were initiated in 2020-2024 (552 in 2020, 628 in 2021, 458 in 2022, 538 in 2023 and 538 in 2024). Of these, 86% (2 331 cases) involved sexual exploitation, 10% (267 cases) labour exploitation, and 4% (116 cases) other forms of THB. In 2020-2024, 1 908 individuals were indicted for THB offences, with 88% (1 681 persons) charged for sexual exploitation, 6% (113 persons) for labour exploitation, and 6% (114 persons) for forced begging and other forms of THB.

133. In 2020-2024, 764 individuals were convicted of THB offences (see Appendix 1 for detailed statistics), which represents a decrease compared to the previous reporting period.[105] There were at least four convictions involving legal entities. In 2022-2024, 395 convictions were for sexual exploitation, 14 for labour exploitation, 19 for forced begging and 14 for other forms of THB. Before 2022, data was not disaggregated by exploitation type. Plea bargain agreements were concluded in nine cases in 2020, five in 2021, four in 2022, six in 2023 and nine in 2024. As regards the sentences issued in 2020-2024, 43 involved imprisonment of over 10 years, 190 of five to 10 years, 147 of three to five years, 39 of one to three years, and three of less than a year. Execution of 111 sentences was suspended, and 3 were postponed. GRETA notes with satisfaction that following an amendment made to the CC in June 2024 (see paragraph 13), the suspension of sentences in case of conviction for THB is no longer possible.

134. In its previous reports, GRETA highlighted a tendency to qualify THB for sexual exploitation as pimping.[106] As noted previously, a law passed in October 2024 repealed paragraphs 2 and 3 of Article 213 of the CC which criminalised pimping by coercion and procuring of a minor.[107] As a result, these acts are now prosecuted and punished under the offences of human trafficking (Article 210) and child trafficking (Article 211). Beyond clarifying the legal framework, this amendment brings several advantages. First, classifying such cases as THB instead of pimping ensures that victims receive official recognition as THB victims, granting them access to specialised protection and assistance measures. Second, such cases fall under the jurisdiction of DIICOT, which has specialised prosecutors.

105 There were 792 convictions for THB in 2016-2019. See GRETA's third report, paragraph 100.

106 See GRETA's third report, paragraphs 97 and 106.

107 These provisions criminalise the inducement to start or to continue the practice of prostitution by coercion and acts of procuring of a minor.

135. NGOs highlighted two issues that contribute to the decline in THB convictions. First, THB cases are often prosecuted as lesser offences due to law enforcement and judicial actors' lack of expertise and difficulties in proving THB. For example, adult victims recruited and exploited through the 'loverboy' method are often classified as pimping if coercion cannot be proven. Second, prosecutions still heavily rely on victim and witness testimony. This hinders effective investigations and prosecutions because victims are often threatened or paid by the traffickers to change their testimony or they retract their testimony due to emotional ties with traffickers.

136. Another issue of concern is the involvement of public officials in human trafficking. The Romanian authorities' response to the Committee of the Parties' recommendation issued in the context of the third evaluation round referred to three THB cases in 2021-2022 where officials were indicted.[108] In the first case, a secondary school teacher was charged with child trafficking, sexual acts with a child and child pornography after coercing a vulnerable girl into prostitution. In the second case, two certified maternal assistants were indicted for child trafficking for exploiting four foster children (aged 11-15) in forced labour. The third case involved eight defendants, including a mayor, indicted for child trafficking, rape, influencing statements, assault and drug possession. Furthermore, in September 2023, the DIICOT office in Maramureș indicted seven individuals, including a Child Protection Directorate employee, for THB and forced labour. In April 2023, the DIICOT office in Pitești indicted seven people, including a police officer, for pimping and THB.

137. As noted in paragraph 129, in 2023, DCCO expanded its financial investigations team with 17 new positions (2 at the central office and 15 in regional offices). According to the Romanian authorities, the identification and seizure of criminal assets have improved during the reporting period. This is reflected in DIICOT data showing an increase in the value of seized assets in THB cases: a total of RON 68.5 million (approximately EUR 13.7 million) in 2020-2024.[109] The value of the confiscated assets has also increased, with courts issuing 17 judgments pronouncing confiscation in the amount of RON 2.17 million (around EUR 438 000) in 2021, 25 judgments for RON 2.8 million (around EUR 569 000) in 2022, and 33 judgments for RON 4.93 million (around EUR 991 000) in 2023. However, law enforcement officers noted growing challenges in tracing criminal assets and proving links to crimes, complicated by the increasing use of cryptocurrency.

138. GRETA was informed that the average duration of criminal proceedings finalised in 2023 was 498 days for trafficking in adults and 626 days for child trafficking. In 2024, the average duration decreased to 470 days for trafficking in adults and 512 days for child trafficking. These figures exclude the investigation and appeal stages, which can be lengthy. The authorities stated that the duration of criminal proceedings is prolonged due to the complexity of cross-border cases, heavy judicial workload and high turnover of judicial actors. Romanian legislation further complicates investigations, making evidence collection and case preparation time-consuming.[110] In this regard, GRETA welcomes the introduction of Article 355^1 to the CPC by Law No. 217/2023, which require all cases involving child trafficking victims to be tried as a matter of urgency.

139. With a third of the identified THB victims trafficked being abroad, cross-border co-operation is essential. During the reporting period, the Romanian authorities established 24 joint investigation teams (JITs) in THB cases: six in 2021 (four with the UK, one with France, one with Norway), four in 2022 (one with the UK, two with Ireland, one with Spain), seven in 2023 (three with the UK, one each with Italy,

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108 https://rm.coe.int/report-submitted-by-the-authorities-of-romania-on-measures-taken-to-co/1680aba92d.

109 RON 7.9 million in 2020, RON 8.1 million in 2021, RON 8.2 million in 2022, RON 38 million in 2023, and RON 6.2 million in the first half of 2024.

110 According to a report issued by La Strada International, in Romania "gathering evidence and bringing the case before the court is extremely laborious and time consuming. The law requires all kinds of details and precise documentation of every period of exploitation for each victim. For example, telephone interceptions in themselves would be insufficient. Furthermore, written statements of each person are required. The indictment can therefore be 400-500 pages long and judges may reject the documentation due to the sheer volume of pages. In such cases, judges will typically return the indictment and request clarification." See La Strada International, Protecting Asian Trafficking Victims in Europe, October 2022, page 28.

Portugal, Hungary, and the Republic of Moldova), and seven in 2024 (with Hungary, Estonia, Germany, the UK, Switzerland, and the Republic of Moldova).

140. During the reporting period, DCCO participated in several EUROPOL-EMPACT joint actions aimed at dismantling organised crime groups and identifying THB victims, including European Action Days on labour and child trafficking, a large-scale European Action Day on THB, and the EMPACT THB Hackathon. Further, the Romanian police deployed investigators to the UK and Spain to assist in THB-related cases involving Romanian nationals. DIICOT also collaborated extensively with European counterparts on judicial assistance requests. In 2022 alone, DIICOT worked with the authorities of 25 countries, issuing 60 requests for letters rogatory and European Investigation Orders, five requests for criminal case transfers, and receiving 44 such requests along with 11 case transfer requests. The authorities emphasised the need for stronger co-operation with certain EU countries, particularly Italy, which hosts many Romanian workers.

141. In 2021, a new paragraph (1^1) was added to Article 266 of the CC to punish the act of a person who, having knowledge of the commission of the offences of trafficking and exploitation of vulnerable persons or sexual offences against a child, does not immediately notify the authorities, by imprisonment for a term of six months to two years. To date, five investigations have been initiated under this provision, and in two of those cases, five individuals were charged with this offence in 2023 and 2025.

142. While welcoming the legislative amendments, the progress in asset seizure and confiscation and Romania's active participation in international co-operation, GRETA considers that the Romanian authorities should make further efforts to strengthen the criminal justice response to THB, in particular by:

- ensuring that human trafficking offences are proactively and promptly investigated, making use of special investigation techniques in order to gather material, documentary, financial and digital evidence, so that there is less reliance on testimony by victims or witnesses;

- strengthening the human resources of the Department for Combating Organised Crime and the Directorate for Investigating Organised Crime and Terrorism to effectively investigate and prosecute THB cases;

- continuing to provide training and develop the specialisation of investigators, prosecutors and judges to deal with human trafficking cases and to ensure that they are not re-qualified as other offences which carry lighter penalties and deprive victims of THB of access to protection, support and compensation;

- taking further measures to ensure that the length of court proceedings in THB cases is reasonable, in line with the case-law of the European Court of Human Rights (regarding Article 6, paragraph 1, of the ECHR) and the standards set by the European Commission for the Efficiency of Justice (CEPEJ).[111]

c. Protection of victims from intimidation

143. In its third report, GRETA urged the Romanian authorities to enhance the protection of vulnerable THB victims and witnesses, especially children, including by making increased use of the witness protection programme, banning the publication of victims' names on judicial websites, and effectively investigating any cases of intimidation and threats against victims and witnesses.

111 https://rm.coe.int/cepej-2018-26-en-rapport-calvez-regis-en-length-of-court-proceedings-e/16808ffc7b

144. The CPC, Law No. 682/2002 on Witness Protection and the Anti-Trafficking Law provide for a number of protection measures for particularly vulnerable victims and threatened witnesses, including identity change, relocation, residence surveillance, escorted travel, and hearings via audio-visual transmission or in camera.[112] In 2023, the CPC was amended and some of the measures for vulnerable victims (e.g., children, persons with disabilities and victims of sexual offence) were made mandatory. These include in-camera hearings, interviews in specifically designed rooms with the participation of a psychologist or victim counsellor, having the same interviewer for repeat hearings, and audio-video recording.

145. GRETA was informed that in 2020-2024, four individuals from three THB cases were placed in the witness protection programme. In 2022, DIICOT applied protection measures under Articles 126-129 of the CPC (e.g., audio-visual hearings) to vulnerable victims and threatened witnesses in 41 cases of THB.

146. During the reporting period, the authorities significantly increased the number of specialised rooms for interviewing child victims and witnesses. These rooms, equipped with one-way mirrors or other discrete observation tools, are now available in each county police inspectorate. Additionally, there are seven interview rooms for children in DGASPCs (in Bacău, Botoșani, Buzău, Cluj, Constanța, Iași, and Bucharest - District 1), 51 in courts and 42 in prosecutor's offices. DIICOT has two such rooms, established in 2023 at its headquarters and the Galați regional office. However, NGOs raised concerns about the infrequent use of these rooms and emphasised the need for nationwide monitoring to ensure their proper utilisation. DIICOT reported that five children (one witness and four victims) were interviewed in its two child-friendly rooms in 2023 and 10 in 2024.

147. GRETA was informed of significant improvements in preventing repeated interviews and re-traumatisation of child victims of sexual offences. This progress is attributed to training of prosecutors and judges on handling child sexual abuse cases, interviewing techniques and juvenile justice. In 2023, the General Prosecutor's Office issued investigative guidelines which stressed the importance of avoiding stereotyping and victim-blaming and recommended the use of the NICHD Investigative Interview Protocol for interviewing child victims.[113] Further, in 2022, a guide on interviewing THB victims, including children, was developed, along with a methodological guide on hearing child victims of violence.

148. GRETA was informed that, in practice, some of the above-mentioned protection measures, such as residence surveillance and escorted travel measures, are rarely applied to victims due to resource shortages in the police. An NGO representative also reported that the police told a victim they could not protect her if she filed a complaint against her trafficker. GRETA met a social worker who, despite threats from a trafficker linked to a criminal group, was not allowed to testify remotely or send written testimony.

149. In its third report, GRETA urged the Romanian authorities to ban publishing victims' names on judicial websites. In response, on 13 May 2021, the Superior Council of Magistracy issued Decision No. 600, requiring courts to anonymise victims' names in the judicial portal. The authorities noted that the portal was updated to implement this decision. However, victims' names remain publicly visible at court premises, displayed on hearing room doors alongside the crime type (e.g., rape, pimping, human trafficking). NGOs also reported cases in which the victims' names were mistakenly published on the judicial portal, despite decisions to anonymise them. Victims seeking compensation in civil court or applying for vouchers to cover their urgent needs (see paragraph 118) also face exposure, as their names are not anonymised. Additionally, social workers and school officials have reportedly disclosed victim identities, leading to stigma.

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112 See GRETA's third report, paragraphs 121, 122 and 151.

113 This is an internationally used protocol for the investigative interviewing of children developed by the National Institute of Child Health and Human Development (NICHD): https://link.springer.com/content/pdf/10.1007/978-3-319-58388-4_6.pdf?pdf=inline%20link

150. Law No. 272, adopted in November 2024, strengthened the legal framework for the protection of victims' personal data by introducing two new obligations for the judicial authorities under Article 35 of Law No. 211/2004 on measures to ensure the information, support and protection of victims of crime. First, the judicial authorities are required to preserve the confidentiality of victims' addresses by ensuring that summonses, notifications and procedural communications are stored separately in a confidential folder, inaccessible to the parties or the media. Second, all procedural documents must anonymise not only the victim's address or place of residence but also any other information that could lead to the identification of their location.

151. While welcoming the legislative amendments strengthening victim protection, the increase in specialised interview rooms and the development of victim interviewing guidelines, GRETA is concerned about the insufficient application of protection measures to prevent the intimidation of victims and witnesses, as well as the reported practice of displaying victims' names on hearing room doors. Therefore, GRETA considers that the Romanian authorities should take additional steps to:

- ensure that the protection measures provided for in law are effectively applied to victims and witnesses of human trafficking in order to avoid them being subjected to intimidation and reprisals;

- effectively investigate and sanction any cases of intimidation and threats against victims and witnesses of human trafficking;

- ensure that the identity of victims of trafficking is not made publicly known through the media or by other means;

- avoid, to the extent possible, cross-examination of victims of trafficking in the physical presence of the defendant and the repeated questioning of victims of trafficking;

- ensure that child victims of trafficking are interviewed in child-friendly interview rooms.

d. Criminalisation of the use of services of a victim

152. The Romanian CC criminalises the knowing use of the services of an exploited person, whether in the form of sexual exploitation or forced labour, slavery or practices similar to slavery, forced begging or organ removal of organs (Article 216 of the CC). The offence is punishable by six months to three years' imprisonment.

153. Since 2021 the authorities have investigated 32 criminal cases under Article 216 of the CC (5 in 2021, 7 in 2022, 11 in 2023, 6 in 2024 and 3 in 2025), of which eight cases involving 25 defendants resulted in indictments.

IV. Addressing human trafficking facilitated by information and communication technology (ICT)

154. Countries monitored by GRETA have reported an increased use of information communication technologies (ICT) for recruiting and controlling victims of trafficking. In 2022, GRETA conducted a study to assess the extent to which technology impacts trafficking and explore the operational and legal challenges that states face in detecting, investigating and prosecuting online and ICT-facilitated trafficking.[114] As highlighted by the study, the impact of technology is particularly acute in relation to the recruitment and exploitation of victims, including their control throughout the different stages of the trafficking process. This study highlighted a number of challenges to the identification, investigation and prosecution of THB cases due to the high volume of online activities and the associated high volume of digital evidence, the use of encrypted communications, nicknames and aliases, and the time-consuming process of acquiring evidence from private companies and/or other jurisdictions. At the same time, anti-trafficking stakeholders are using technological innovations to prevent human trafficking, protect victims, and prosecute traffickers. It is therefore essential to invest in human capital and technological tools to harness the potential of ICT for effectively combating human trafficking.

155. The Romanian authorities have noted a shift in traffickers' methods, with an increased use of online platforms for recruiting victims, promoting services and contacting clients. Traffickers are also increasingly exploiting victims through sex videochat activities. Official data show that out of 2 052 victims identified in 2020-2023, 335 were recruited online, of whom 286 for sexual exploitation, 25 for labour exploitation, 7 for forced begging and 2 for other purposes, such as forced marriage.

156. ANITP and NGOs have conducted a series of awareness-raising campaigns on online exploitation risks (e.g., "Your Safety is Not a Game", "Spread Your Wings! Information Means Freedom", and "Looking for a Job? Watch Out for THB Traps!"). The NGO eLiberare, in collaboration with the Ministry of Education, developed materials for educators, social workers and parents which are used in schools, youth clubs and community organisations. This includes the guide "Parents in the Digital Age: How to Talk to Children and Teens about Internet Dangers?", published in June 2024.[115] Since 2016, eLiberare has also offered a comprehensive anti-trafficking education programme for schools, covering online sexual exploitation, the 'loverboy' method and a video on online abuse and exploitation.[116]

157. Police officers and prosecutors have received training to enhance their capacity to handle THB and other serious ICT-facilitated crimes. The training sessions covered digital evidence identification, collection and analysis, the use of open-source intelligence (OSINT) tools, and best practices for communicating with children affected by online sexual abuse, exploitation and trafficking.

158. In 2022, the Romanian Police acquired GRIFFEYE, a forensic software that helps analyse large volumes of data to detect child sexual abuse materials and online trafficking for sexual exploitation. Used by the DCCO cybercrime unit, it aids in victim identification and links crime scene evidence to suspects. Additionally, the General Inspectorate of the Romanian Police is collaborating with the UK authorities in the use of the web crawler Traffic Jam in the investigation of the cases of trafficking for sexual exploitation.[117] However, professionals working in the anti-trafficking field expressed concern that, despite these efforts, the growing role of technology in the recruitment and exploitation of victims is a major challenge. Police officers still lack the resources and expertise needed for effective online investigations.

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114 Paolo Campana, Online and Technology-Facilitated Trafficking in Human Beings, Council of Europe: https://rm.coe.int/online-and-technology-facilitated-trafficking-in-human-beings-full-rep/1680a73e49, published in April 2022.

115 https://www.eliberare.com/resurse-pentru-parinti/

116 https://www.eliberare.com/pachet-educational-de-prevenire-a-traficului-de-persoane/

117 Traffic Jam — Marinus Analytics

159. As for co-operation with ICT companies, ANITP collaborated with Vodafone, which led to the development of Bright Sky RO, a free mobile app offering specialised support for victims of domestic and gender-based violence. The app also includes a guide on preventing THB. As part of this partnership, Vodafone sent anti-trafficking messages to all its subscribers on European Anti-Trafficking Day (18 October).

160. The National Action Plan against THB includes measures to address the growing use of ICT in trafficking. These include awareness-raising campaigns on online child abuse in schools and state protection facilities, expanding police use of investigative software, training anti-trafficking specialists in open-source analysis, and ensuring digital services comply with EU regulations to prevent online sexual exploitation.

161. Romania is a party to the Council of Europe Convention on Cybercrime (Budapest Convention) since May 2004 and has signed, but not yet ratified, its Second Additional Protocol on enhanced co-operation and disclosure of electronic evidence.

162. GRETA welcomes the steps taken by the Romanian authorities to promote online safety and enhance their capacity to detect and investigate ICT-facilitated trafficking in human beings and considers that they should develop further measures, in particular:

- continue to invest in capacity building and digital tools to conduct proactive investigations. This should involve training of law enforcement officers, labour inspectors and financial police officers in the areas of Internet monitoring and online investigation, such as cyber-patrolling, undercover online investigation and social network analysis, in order to identify victims of human trafficking recruited and/or exploited online;

- strengthen co-operation with ICT companies and Internet service providers and develop data-sharing procedures with companies holding relevant data.

163. Furthermore, GRETA invites the Romanian authorities to ratify the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence.

V. Follow-up topics specific to Romania

1. Legal assistance and free legal aid

164. In its third report, GRETA noted that due to unclear legislation, courts do not always grant free legal aid to victims subjected to forms of exploitation other than sexual and considered that the Romanian authorities should strengthen their efforts to facilitate and guarantee access to free legal aid for presumed victims of THB.

165. Article 93 of the CPC requires judicial bodies to appoint an *ex officio* lawyer if an injured person or civil party cannot defend themselves. Law No. 217/2023 amended this article to explicitly include adult and child trafficking victims among the beneficiaries of free legal assistance by an *ex officio* lawyer in criminal proceedings. This obligation was further reinforced by Law No. 279, adopted in October 2022, which renders procedural acts performed without an *ex officio* lawyer null and void if the obligation is not upheld.

166. Another positive development occurred in November 2024 with the amendment of Law No. 211/2004, which defines the conditions for granting free legal aid to victims of crime. This aid can be used to cover the cost of legal representation as well as judicial costs for claiming compensation and the enforcement of court decisions. Changes include removing the requirement of not having sufficient financial means to receive free legal aid for victims of slavery, human trafficking and child trafficking, removing the requirement to report the crime within 60 days, introducing standardised applications for the provision of free legal aid, and extending free legal aid to family members if the victim dies. Further, the amendments raised the amount to be granted as payment for free legal aid from two to five gross minimum monthly salaries and allowed victims to request payment of free legal aid a second time in lengthy trials, provided the total amount does not exceed the double of the five-salary limit. However, civil society actors raised concerns about the insufficient quality of victim representation by *ex officio* lawyers.[118] GRETA was not informed of any THB-specific training provided to these lawyers.

167. According to data provided by the Romanian authorities, 21 victims of THB received free legal aid in 2020, none in 2021, 18 in 2022 and 13 in 2023. Additionally, legal assistance in criminal proceedings was provided to 37 victims of THB in 2020, 75 in 2021, 71 in 2022, and 133 in 2023.[119]

168. GRETA welcomes the legislative amendments improving trafficking victims' access to legal assistance and free legal aid and considers that the Romanian authorities should encourage the Bar Associations to offer training on THB to lawyers with a view to ensuring that trafficking victims are systematically appointed a lawyer with relevant specialisation and training on THB.

2. Compensation

169. In its third evaluation report,[120] GRETA identified several obstacles preventing trafficking victims from obtaining compensation from the state and perpetrators. These included inadequate information on their right to claim compensation, difficulties accessing free legal aid for civil court proceedings, challenges in enforcing compensation orders due to delayed asset identification and freezing, and a dysfunctional state compensation mechanism due to its complex application process. GRETA urged the Romanian authorities to improve access to compensation, including by ensuring that the collection of evidence about

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118 See also La Strada International, Protecting Asian Trafficking Victims in Europe, October 2022, page 32.

119 By way of comparison, 188 victims of THB received free legal aid in 2016, pursuant to Law No. 211/2004, 317 in 2017, 296 in 2018, and 81 in 2019.

120 See GRETA's third report, paragraphs 76-78, 84, and 85.

the harm the victim has suffered is part of the criminal investigations, supporting victims in enforcing compensation orders, and simplifying access to state compensation.

170. The legal framework for compensation, as detailed in GRETA's third report,[121] has remained unchanged. Judges informed GRETA that victims of trafficking for the purpose sexual exploitation cannot claim compensation from traffickers for lost earnings, as prostitution is not a legal activity. In GRETA's opinion, denying such compensation contradicts the purpose of Article 15 of the Anti-Trafficking Convention. GRETA refers to the case of *Krachunova v. Bulgaria*,[122] in which the European Court of Human Rights ruled that Article 4 of the European Convention on Human Rights imposes a positive obligation on states to enable the victims of human trafficking for the purpose of sexual exploitation to claim compensation from their traffickers in respect of lost earnings.

171. There are no official statistics on the number of compensation claims made by THB victims. According to data provided by the Romanian authorities, the number of victims awarded compensation by a final court decision was 33 in 2020, 235 in 2021, 86 in 2022, 136 in 2023 and 68 in 2024. The total amount of compensation granted amounted to approximately EUR 733 000 in 2021, EUR 811 000 in 2022, EUR 1.74 million in 2023, and EUR 993 000 in 2024. However, NGOs reported that few victims actually received court-ordered compensation. Even when traffickers' assets are confiscated, victims struggle to access compensation due to asset management issues. For example, an NGO lawyer seeking compensation for a THB victim was told they needed to specify the exact "department" of the state budget where confiscated assets were transferred. Additionally, court rulings do not always designate confiscated assets for victim compensation, leading the state to prioritise recovering judicial costs over compensating victims.

172. As noted in GRETA's third report, THB victims can seek financial compensation from the state under Law No. 211/2004 on Certain Measures to Ensure the Information, Support and Protection of Victims of Crime (Articles 21-34).[123] Amendments introduced by Law No. 230/2022 expanded compensation to include moral damages and removed the previous cap of 10 gross minimum wages for material damages related to property loss or destruction.

173. While welcoming these amendments, GRETA notes that, according to information from the Ministry of Justice, only one THB victim (a Romanian girl) was known to have been granted state compensation during the reporting period.[124] The compensation, awarded in 2022, amounted to RON 196 836 (around EUR 39 500). Studies by the Ministry of Justice (2021-2022) examined the low number of state compensation grants and found that victims often receive information from the authorities that lacks sufficient detail, presenting numerous rights without clear explanations on how to exercise them. The studies also highlighted the need for better training of lawyers on the compensation mechanism and identified additional barriers, such as strict application deadlines.

174. To address these issues, a draft law amending Law No. 211/2004 was promulgated on 4 November 2024. The amendments include removing the requirement for victims to report the crime within 60 days, extending the compensation claim period from one to three years, and eliminating the need to prove the offender's insolvency. Beneficiary categories now cover additional crimes such as slavery, forced labour, torture, illegal deprivation of liberty, child pornography and other sexual offences. Other changes include standardised forms for compensation requests and advances, as well as the option to request a second advance payment in lengthy trials.

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121 See GRETA's third report, paragraphs 72-75 and 83.

122 *Krachunova v. Bulgaria*, Application no. 18269/18, 28 November 2023. In that case, the European Court of Human Rights concluded that Bulgaria had violated Article 4 of the European Convention on Human Rights. The violation occurred because Bulgarian courts had rejected the applicant's claim for compensation for the earnings from sex work that her trafficker had taken from her, arguing that returning earnings from prostitution would be contrary to 'good morals'.

123 See paragraphs 82 and 83 of GRETA's third report on Romania.

124 During the previous reporting period, only one victim of THB was granted state compensation (in 2017). See paragraph 84 of GRETA's third report on Romania.

175. GRETA urges the Romanian authorities to review the legislation in order to enable victims of trafficking for the purpose of sexual exploitation to claim compensation from their traffickers for the earnings from exploitation in prostitution that were withheld from them by traffickers.

176. Further, concerned by the persisting difficulties in victim compensation, GRETA considers that the Romanian authorities should take additional steps to facilitate and guarantee access to compensation for victims of trafficking, in particular by:

- taking steps to make compensation awarded in criminal proceedings payable by the State in advance, and the State taking the responsibility to recover the amount from the offender;

- taking additional measures to support victims to effectively enforce compensation orders. This includes making full use of the legislation on the freezing and forfeiture of assets, as well as international co-operation, to secure compensation to victims of THB, and ensuring that any recoverable property seized in criminal proceedings is prioritised for the payment of the compensation to the victim;

- including the topic of compensation in training programmes for lawyers, prosecutors and judges and encourage them to use all the possibilities the law offers to uphold compensation claims by victims of THB.

3. Non-punishment provision

177. In its third report, GRETA urged the Romanian authorities to expand the non-punishment provision under Article 20 of the Anti-Trafficking Law to include all offences, including administrative ones, that THB victims were compelled to commit. GRETA also noted that Article 20, paragraph (2), of the Anti-Trafficking Law referenced Article 3 of an unspecified law, likely intended to refer to Law No. 61/1991, which penalises prostitution and begging in public places with fines. This ambiguity made the non-punishment provision ineffective for these administrative offences. GRETA welcomes the correction made by Law No. 136 of 24 May 2023, which now explicitly provides that THB victims are not punished for prostitution or begging in public places.

178. As noted in paragraph 80, many victims of THB for the purpose of exploitation in prostitution are not identified as victims and are instead fined for prostitution. There are no official statistics on the application of the non-punishment provision, but GRETA was informed that fines were cancelled in cases where victims were later identified as trafficked persons. A 2024 report by La Strada International[125] refers to two cases in which the non-punishment provision was correctly applied by the Romanian judicial authorities. In the first case, a trafficking network forced several individuals to beg, steal and engage in prostitution in Austria, using their identities for fraud. Six persons were convicted in Austria but were later identified as trafficking victims in Romania. A Romanian prosecutor cooperated with the Austrian authorities to clear their criminal records and compensate the victims who had been punished. In the second case, a Romanian woman was forced by her husband and his associate into prostitution for several years in Romania and two years in the Netherlands. She was repeatedly fined for engaging in prostitution, accumulating debts of RON 526 744 (around EUR 105 000). After experiencing a psychotic crisis and hospitalisation in the Netherlands, she returned to Romania and was assisted by the NGO ADPARE. A Romanian judge applied the non-punishment provision, finding that she had acted under duress during her exploitation, and her financial debt was erased.

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125 La Strada International, Assessment of the Principle of Non-Punishment: Collection of Case Law, 2024.

179. The Romanian authorities noted that the initial training of police officers includes the application of non-punishment provision.

180. GRETA welcomes the legislative amendments clarifying the scope of the non-punishment provision and considers that the Romanian authorities should take further measures to ensure effective compliance with the principle of non-punishment of victims of THB for their involvement in unlawful activities, to the extent that they were compelled to do so. Such measures should include the development of guidance for police officers and prosecutors on the scope and application of the non-punishment provision.

VI. Conclusions

181. Since the publication of GRETA's third report on Romania on 3 June 2021, progress has been made in a number of areas covered by that report.

182. The Government adopted a new National Strategy against Trafficking in Human Beings (2024-2028), taking into consideration the findings and recommendations of an independent evaluation of the previous strategy and GRETA's earlier recommendations. A series of legislative changes were introduced to strengthen the criminal justice response and improve victim protection and access to services, legal aid and compensation. In December 2023, Parliament established a Joint Special Committee of the Chamber of Deputies and the Senate for Combating Human Trafficking. In January 2023, the Government approved a new National Identification and Referral Mechanism (NIRM), replacing the one introduced in 2007, along with practical guides to support its implementation. The authorities also significantly increased the number of child-friendly interview rooms and developed guidelines for victim interviewing.

183. GRETA welcomes these positive developments in Romania. However, despite the progress achieved, some issues continue to give rise to concern. Some recommendations made repeatedly by GRETA in its preceding reports have not been implemented or have been only partially implemented. In this report, GRETA once again urges the Romanian authorities to take action in the following area:

- Assistance to victims (Article 12 of the Convention). The Romanian authorities should intensify their efforts to provide assistance to victims of trafficking, regardless of their nationality, in particular by:

  - providing adequate, safe and, where appropriate, separate, accommodation to all victims of trafficking who need it, including men;

  - ensuring adequate funding and staff to work with victims of THB and facilitate the reintegration of victims of trafficking into society;

  - providing adequate and sustainable funding to NGOs to ensure the range and quality of the services delivered by them to victims of THB;

  - guaranteeing access to health care to all victims of THB.

184. Given that these recommendations have been made repeatedly, their priority implementation is requested and will be followed up as part of the monitoring of the implementation of the Convention.

185. As regards the thematic focus of the fourth evaluation round, which is on vulnerabilities to trafficking in human beings, the authorities have acknowledged the vulnerabilities of children in institutions, persons engaged in prostitution, persons with disabilities, Romanian nationals migrating abroad for work and migrant workers in Romania. Measures to address and prevent such vulnerabilities have been included in the National Action Plan for 2024-2026, as well as in other strategic documents and programmes aimed at facilitating access of vulnerable persons to education, employment, health care and support services.

186. While welcoming the measures taken by the Romanian authorities to prevent trafficking through measures addressed at vulnerable groups, GRETA has identified a number of areas of concern which require further action. The following issues should be addressed as a matter of priority:

- strengthen the prevention of child trafficking, in particular by increasing the resources of the child protection services, and implementing social and economic measures and programmes aimed

at supporting children in vulnerable situations, including children living in and leaving institutional care;

- take further steps to prevent the trafficking of migrant workers, including by revising the legislative framework with a view to preventing the abusive termination of contracts and enabling migrant workers to leave an exploitative employment relationship, establishing safe reporting and effective complaint mechanisms, introducing licencing of recruitment agencies bringing migrant workers to Romania, and monitoring fraudulent online job advertisements;

- improve the protection of persons with disabilities, in particular by ensuring a regular, effective and independent monitoring of residential centres for such persons, further developing their access to economic, social and healthcare services, and training professionals assisting them;

- carry out individualised risk assessment prior to any forced removals of asylum seekers and irregular migrants which should cover the risks of trafficking or re-trafficking on return, in compliance with the obligation of *non-refoulement*;

- review the legislation in order to enable victims of trafficking for the purpose of sexual exploitation to claim compensation from their traffickers for the earnings from exploitation in prostitution that were withheld from them by traffickers.

187. GRETA welcomes the steps taken by the Romanian authorities to promote online safety and enhance their capacity to detect and investigate ICT-facilitated human trafficking. In order to address the routine use of ICT to recruit and exploit victims of trafficking, the authorities should promote further capacity building and digital tools to conduct proactive investigations. They should also strengthen co-operation with ICT companies and Internet service providers.

188. GRETA invites the Romanian authorities to keep it regularly informed of developments as regards the implementation of the Convention. GRETA trusts that there will continue to be a political commitment in Romania to sustain the efforts to combat all forms of human trafficking by following the human-rights based approach of the Convention and looks forward to continuing the dialogue with the Romanian authorities and civil society.

Appendix 1

Table with statistics on victims and cases of THB in Romania in 2020-2024

The data presented in the table is not directly comparable across States Parties to the Convention due to variations in the methodologies used for data collection

Indicator		2020	2021	2022	2023	2024
Number of identified victims		596	505	500	451	610
Sex and age group	Women	257	189	205	165	196
	Men	84	34	61	65	81
	Girls	206	255	195	182	295
	Boys	49	27	39	39	38
Type of exploitation	Sexual	429	382	342	284	503
	Labour	94	51	73	67	92
	Forced begging	37	24	53	37	20
	Forced criminality	1	0	0	2	5
	Attempted trafficking	34	45	28	26	14
	Other situations	0	3	2	35	16
Country of exploitation	External trafficking	275	38	209	128	152
	Internal trafficking	321	467	291	323	458
Number of victims assisted by public institutions	Total	289	315	262	241	307
	Women	91	95	80	82	79
	Men	32	28	16	28	46
	Girls	131	177	131	112	157
	Boys	35	15	35	19	25
Number of victims who were granted a recovery and reflection period	Total	0	232	190	178	139
	Women	0	78	55	64	39
	Men	0	15	20	32	18
	Girls	0	125	92	73	68
	Boys	0	14	23	9	14
Number of investigations initiated		552	628	458	538	538
Type of exploitation	Sexual	498	571	399	427	436
	Labour	54	35	37	75	66
	Others	0	22	22	36	36
Number of persons for whom prosecution was initiated		234	257	271	355	791
Type of exploitation	Sexual	220	239	236	318	668
	Labour	14	3	8	27	61
	Forced begging	0	15	24	10	19
	others	0	0	3	0	43
Number of persons convicted for THB (Articles 210 and 211 of the CC)		147	175	164	136	142
Type of exploitation	Sexual	n.a.[126]	n.a.	145	120	130
	Labour	n.a.	n.a.	4	8	2
	Forced begging	n.a.	n.a.	6	3	10
	Others	n.a.	n.a.	9	5	0

[126] n.a.: not available. Indicates that the information could not be obtained or was not provided at the time of drafting the report.

Appendix 2

List of GRETA's conclusions and proposals for action

The position of the proposals for action in the text of the report is shown in parentheses.

Measures to prevent the vulnerability of specific groups to trafficking in human beings

Children

- GRETA urges the Romanian authorities to strengthen their efforts to improve the prevention of child trafficking, in particular by:
  - increasing the resources of the child protection services so that they can play an effective role in the prevention of trafficking of children and the management of cases of children at risk;
  - implementing social and economic measures and programmes aimed at supporting children in vulnerable situations, including children living in and leaving institutional care (paragraph 40);

- GRETA considers that the Romanian authorities should:
  - ensure effective and regular inspections of child residential institutions and their monitoring by independent bodies to prevent exploitation of children;
  - continue providing training on trafficking in human beings to child welfare professionals and other professionals working with children, such as teachers;
  - strengthen their efforts to raise public awareness, especially in rural areas and among children living in residential care, about the risks and different manifestations of child trafficking, including child and forced marriages, and exploitation of begging;
  - establish safe, age-appropriate and accessible complaint mechanisms in residential care facilities for children and actively promote children's understanding and use of these mechanisms through ongoing communication and support;
  - intensify their efforts to combat school dropouts as a preventive measure against child trafficking (paragraph 41).

Disadvantaged minorities

- GRETA welcomes the steps already taken and considers that the Romanian authorities should continue strengthening the prevention of THB among the Roma community, in particular by:
  - continuing targeted awareness-raising and outreach work on the risks of human trafficking;
  - implementing social, economic and other measures, including by promoting their access to education, employment, housing, healthcare and social services;
  - involving Roma organisations in the design and implementation of anti-trafficking policies and measures;
  - integrating measures to prevent human trafficking into strategies and action plans for the integration of the Roma (paragraph 48).

Migrant workers

- Referring to its Guidance Note on combating trafficking for labour exploitation and the Council of Europe Committee of Ministers Recommendation to Member States CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation, GRETA urges the Romanian authorities to take further steps to prevent trafficking for the purpose of labour exploitation, in particular by:
  - revising the legislative framework on the employment of migrant workers with a view to preventing the abusive termination of contracts by employers and enabling migrant workers to leave an exploitative employment relationship and take up a job with another employer;
  - establishing safe reporting and effective complaint mechanisms for foreign workers;
  - introducing licencing of recruitment agencies which act as intermediaries for migrant workers arriving in Romania and monitoring fraudulent online job advertisements (paragraph 62);

- GRETA considers that the Romanian authorities should:
  - continue enhancing bilateral and international co-operation to ensure the protection of Romanian workers in countries of destination;
  - continue raising awareness of Romanians who intend to search for jobs abroad on safe and legal employment, the risks of human trafficking and support services;
  - establish bilateral co-operation with countries of origin of foreign workers to prevent their nationals from being exploited in Romania;
  - systematically provide information to foreign workers, and especially third-country nationals, in a language they can understand, about the risks of THB for the purpose of labour exploitation, the rights of victims of trafficking and where to access support, as well as on workers' rights under labour laws (paragraph 63).

Asylum seekers and refugees

- GRETA urges the Romanian authorities to carry out individualised risk assessment prior to any forced removals which should cover the risks of trafficking or re-trafficking on return, in compliance with the obligation of non-refoulement. In this context, full consideration should be given to the UNHCR's Guidelines on the application of the Refugees Convention to trafficked persons and GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection (paragraph 75);

- GRETA considers that the Romanian authorities should strengthen their efforts to prevent asylum seekers and refugees from becoming victims of trafficking in human beings, in particular by:
  - systematically providing information to foreign nationals irregularly crossing the border, in a language they can understand, about the possibility of asking for asylum, the rights of asylum seekers and available support measures;
  - providing training on trafficking in human beings to border and local police officers, as well as other relevant officials, with a focus on vulnerabilities that lead to THB and on early detection of cases of THB among asylum seekers;
  - improving the social and economic integration of asylum seekers and refugees and facilitating their access to employment and vocation training;
  - conducting regular and comprehensive assessments of exploitation and THB risks among asylum seekers and refugees;

- continuing to raise awareness of asylum seekers and refugees of their rights and the risks of human trafficking, including recruitment and abuse through Internet/social networks (paragraph 76).

Vulnerabilities related to the gender dimension of human trafficking and of persons engaged in prostitution

- While welcoming the measures taken to address violence against women, GRETA considers that the Romanian authorities should take measures to reduce the risks of exploitation of women and girls in prostitution, including by abrogating the administrative of offence of prostitution, developing exit programmes for those wishing to leave prostitution, and raising awareness among persons in prostitution about the risks of human trafficking and the support services available to victims (paragraph 82);

- GRETA considers that the Romanian authorities should take measures to address the vulnerability of persons engaged in sex videochats to human trafficking. This should include regulating the sex videochat industry through incorporating measures such as age verification, transparent labour contracts, secure payment systems, and accessible mechanisms for reporting coercion and exploitation. Operators who fail to comply with these requirements should be subject to appropriate sanctions (paragraph 83).

Persons with disabilities

- Deeply concerned by numerous systemic obstacles to the effective protection of persons with disabilities in Romania, GRETA urges the Romanian authorities to strengthen their efforts to improve the protection of persons with disabilities from human trafficking, in particular by:
  - ensuring regular, effective and independent monitoring of public and private residential centres for persons with disabilities, especially by facilitating specialised NGOs' access to these facilities;
  - ensuring that professionals assisting persons with disabilities, including caregivers, legal guardians and teachers, are provided with training on human trafficking with a focus on vulnerabilities that lead to THB;
  - further developing access to economic, social and healthcare services for persons with disabilities as a way to reduce their vulnerabilities to human trafficking, including by allocating sufficient funding to county and local authorities to enable them to adequately fulfil their functions related to the protection of the rights of persons with disabilities (paragraph 93).

LGBTI persons

- GRETA considers that the Romanian authorities should take steps to address the vulnerability of LGBTI persons to trafficking in human beings in close co-operation with civil society organisations (paragraph 98).

Identification of victims of THB

- GRETA considers that the Romanian authorities should take further steps to improve the identification of victims of THB, in particular by:
  - ensuring that the NIRM is effectively implemented by all institutions involved in it and continuing providing systematic training to all relevant professionals, including border police officers, social workers, child protection officials, labour inspectors, immigration officials, teachers, school psychologists and health-care staff, on trauma-informed approaches, proactive identification of victims of trafficking and the application of the NIRM;
  - ensuring that the Labour Inspectorate has the mandate and resources to carry out inspections in all economic sectors and to detect cases of THB for the purpose of labour exploitation, including among migrant workers and in remote locations;
  - ensuring that there is a clear separation ("firewall") between immigration enforcement functions and labour inspectorate roles, and that labour inspectors prioritise the detection of persons working in irregular situations who are vulnerable to THB;
  - enabling specialised NGOs with experience in identifying and assisting victims of trafficking to have regular access to facilities for asylum seekers and detained migrants (paragraph 108).

Assistance to victims

- GRETA once again urges the Romanian authorities to intensify their efforts to provide assistance to victims of trafficking, regardless of their nationality, in particular by:
  - providing adequate, safe and, where appropriate, separate, accommodation to all victims of trafficking who need it, including men;
  - ensuring adequate funding and staff to work with victims of THB and facilitate the reintegration of victims of trafficking into society;
  - providing adequate and sustainable funding to NGOs to ensure the range and quality of the services delivered by them to victims of THB;
  - guaranteeing access to health care to all victims of THB (paragraph 119);

- GRETA considers that the Romanian authorities should:
  - strengthen efforts to inform victims as well as public officials and NGOs providing support to victims about the voucher system and simplify the application for vouchers;
  - continue to build strategic partnerships with NGOs and other civil society actors in order to ensure the provision of assistance to victims of THB (paragraph 120).

Investigation, prosecution and sanctions

- GRETA considers that the Romanian authorities should make further efforts to strengthen the criminal justice response to THB, in particular by:
  - ensuring that human trafficking offences are proactively and promptly investigated, making use of special investigation techniques in order to gather material, documentary, financial and digital evidence, so that there is less reliance on testimony by victims or witnesses;
  - strengthening the human resources of the Department for Combating Organised Crime and the Directorate for Investigating Organised Crime and Terrorism to effectively investigate and prosecute THB cases;

- continuing to provide training and develop the specialisation of investigators, prosecutors and judges to deal with human trafficking cases and to ensure that they are not re-qualified as other offences which carry lighter penalties and deprive victims of THB of access to protection, support and compensation;
- taking further measures to ensure that the length of court proceedings in THB cases is reasonable, in line with the case-law of the European Court of Human Rights (regarding Article 6, paragraph 1, of the ECHR) and the standards set by the European Commission for the Efficiency of Justice (CEPEJ) (paragraph 142).

Protection of victims from intimidation

- GRETA considers that the Romanian authorities should take additional steps to:
  - ensure that the protection measures provided for in law are effectively applied to victims and witnesses of human trafficking in order to avoid them being subjected to intimidation and reprisals;
  - effectively investigate and sanction any cases of intimidation and threats against victims and witnesses of human trafficking;
  - ensure that the identity of victims of trafficking is not made publicly known through the media or by other means;
  - avoid, to the extent possible, cross-examination of victims of trafficking in the physical presence of the defendant and the repeated questioning of victims of trafficking;
  - ensure that child victims of trafficking are interviewed in child-friendly interview rooms (paragraph 151).

Addressing human trafficking facilitated by information and communication technology (ICT)

- GRETA welcomes the steps taken by the Romanian authorities to promote online safety and enhance their capacity to detect and investigate ICT-facilitated trafficking in human beings and considers that they should develop further measures, in particular:
  - continue to invest in capacity building and digital tools to conduct proactive investigations. This should involve training of law enforcement officers, labour inspectors and financial police officers in the areas of Internet monitoring and online investigation, such as cyber-patrolling, undercover online investigation, and social network analysis, in order to identify victims of human trafficking recruited and/or exploited online;
  - strengthen co-operation with ICT companies and Internet service providers, and develop data-sharing procedures with companies holding relevant data (paragraph 162);

- Furthermore, GRETA invites the Romanian authorities to ratify the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence (paragraph 163).

Follow-up topics specific to Romania

Overview of trends and changes in the legislative, institutional and policy framework for action against human trafficking

- GRETA considers that the Romanian authorities should examine the possibility of designating as a National Rapporteur a separate organisational entity or another existing independent mechanism for monitoring the anti-trafficking activities of State institutions (paragraph 22).

Legal assistance and free legal aid

- GRETA welcomes the legislative amendments improving trafficking victims' access to legal assistance and free legal aid and considers that the Romanian authorities should encourage the Bar Associations to offer training on THB to lawyers with a view to ensuring that trafficking victims are systematically appointed a lawyer with relevant specialisation and training on THB (paragraph 168).

Compensation

- GRETA urges the Romanian authorities to review the legislation in order to enable victims of trafficking for the purpose of sexual exploitation to claim compensation from their traffickers for the earnings from exploitation in prostitution that were withheld from them by traffickers (paragraph 175).

- Concerned by the persisting difficulties in victim compensation, GRETA considers that the Romanian authorities should take additional steps to facilitate and guarantee access to compensation for victims of trafficking, in particular by:
  - taking steps to make compensation awarded in criminal proceedings payable by the State in advance, and the State taking the responsibility to recover the amount from the offender;
  - taking additional measures to support victims to effectively enforce compensation orders. This includes making full use of the legislation on the freezing and forfeiture of assets, as well as international co-operation, to secure compensation to victims of THB, and ensuring that any recoverable property seized in criminal proceedings is prioritised for the payment of the compensation to the victim;
  - including the topic of compensation in training programmes for lawyers, prosecutors and judges and encourage them to use all the possibilities the law offers to uphold compensation claims by victims of THB (paragraph 176).

Non-punishment provision

- GRETA welcomes the legislative amendments clarifying the scope of the non-punishment provision and considers that the Romanian authorities should take further measures to ensure effective compliance with the principle of non-punishment of victims of THB for their involvement in unlawful activities, to the extent that they were compelled to do so. Such measures should include the development of guidance for police officers and prosecutors on the scope and application of the non-punishment provision (paragraph 180).

Appendix 3

List of public bodies and civil society actors with which GRETA held consultations

Public bodies

- Ministry of the Interior
  - National Agency against Trafficking in Persons (ANITP)
  - General Inspectorate for Immigration
  - General Inspectorate of the Romanian Police, including Directorate for Combating Organised Crime (DCCO)
  - General Directorate of the Romanian Border Police
  - General Inspectorate of the Romanian Gendarmerie

- Ministry of Justice
  - National Administration of Penitentiaries

- Ministry of Labour and Social Solidarity
  - Social Policies Services Directorate
  - Labour Inspectorate
  - National Agency for Employment
  - National Authority for the Protection of the Rights of Persons with Disabilities

- Ministry of Family, Youth and Equal Opportunities
  - National Agency for the Protection of Children's Rights and Adoption
  - National Agency for Equal Opportunities for Women and Men

- Ministry of Foreign Affairs
- Ministry of Education
- Ministry of Health
- Directorate for Investigating Organised Crime and Terrorism (DIICOT) of the Prosecutor's Office attached to the High Court of Cassation
- Superior Council of Magistracy
- National Agency for the Management of Seized Assets
- National Agency for Roma
- People's Advocate Institution (Ombudsman)
- Parliamentary Joint Special Committee of the Chamber of Deputies and the Senate for Combating Human Trafficking

Intergovernmental organisations

- International Organization for Migration (IOM)
- United Nations Children's Fund (UNICEF)
- United Nations High Commissioner for Refugees (UNHCR)

Civil society organisations

- Association for the Development of Alternative Practices for Education and Reintegration (ADPARE)
- Betania Association

- Centre for Legal Resources (CLR)
- Dignity Restored Association
- eLiberare
- E-Romnja
- European Center for Legal Education and Research (ECLER)
- FREE
- Generatie Tanara
- International Justice Mission (IJM)
- Jesuit Refugee Service (JRS)
- Justice and Care
- Micu Bogdan Foundation
- PROTECT Federation of Associations
- RESTART PLUS Association
- SAFE POL

Government's comments

The following comments do not form part of GRETA's analysis concerning the situation in Romania

GRETA engaged in a dialogue with the Romanian authorities on a first draft of the report. A number of the authorities' comments were taken on board and integrated into the report's final version.

The Convention requires that "the report and conclusions of GRETA shall be made public as from their adoption, together with eventual comments by the Party concerned." GRETA transmitted its final report to the Bulgarian authorities on 25 July 2025 and invited them to submit any final comments. The authorities replied by letter dated 15 October 2025 (reproduced hereafter) that they did not have any further comments to make.

PROMANIA

MINISTRY OF INTERNAL AFFAIRS

NATIONAL AGENCY AGAINST TRAFFICKING IN PERSONS

To **Mrs Petya Nestorova**
Executive Secretary *of the Council of Europe Convention on Action against Trafficking in Human Beings*
Reference: Your letter dated 25 July 2025

Dear Mrs Nestorova,

With regard to possible observations concerning the forth evaluation round of the Report submitted by Romania on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings, we would like to inform you that there are no further amendments from our side.

We take the opportunity to reiterate the Romanian authorities' continued efforts and commitment towards the full implementation of the Council of Europe Convention on Action against Trafficking in Human Beings.

Sincerely,
Designated Director
STEPANESCU MARIA CRISTINA
Bucharest, 15 October 2025

Drafted by,
GRETA Contact Person
Delia Negraru

cc: Permanent Representation of Romania to the Council of Europe

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