

FOURTH EVALUATION ROUND

Measures to prevent and detect vulnerabilities
to human trafficking

EVALUATION REPORT ARMENIA

GRETA
Group of Experts
on Action against
Trafficking in Human Beings



Implementation of the
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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) of the Convention. 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 from 2022 to March 2026, evaluates the measures taken by Armenia 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 to 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 Armenian authorities have taken a series of steps to develop the legislative and policy framework for action against THB. The new Criminal Code (CC) introduced new provisions on human trafficking, leading to amendments to the Law on Identification and Support to Persons Subjected to Trafficking in Human Beings and Exploitation. The Labour Code was revised in 2023, introducing a definition of compulsory and forced labour and safeguards against harmful and prohibited child labour. Following an external evaluation of the 6th National Action Plan (NAP) against Trafficking and Exploitation of Human Beings, the 7th NAP was adopted for the period 2023-2025. GRETA considers that the authorities should ensure the allocation of adequate and sustainable funding for the implementation of the NAPs.

The number of victims of THB identified in Armenia has increased over the years (6 in 2022, 25 in 2023, 25 in 2024 and 34 in 2025). There were 31 women, 37 men and 22 children amongst the victims. Labour exploitation has become the predominant form of exploitation, followed by sexual exploitation. Most victims were Armenian citizens trafficked internally. There has been an increase in the number of foreigners referred for formal identification to the Victim Identification Commission (VIC) on suspicions of labour exploitation.

In Armenia, children and young persons, in particularly those placed in alternative care institutions or leaving such institutions, are vulnerable to THB for different forms of exploitation. There is limited monitoring and oversight of alternative care due to lack of resources and capacities of the guardianship and trusteeship commissions, particularly in rural areas. GRETA underlines the importance of conducting regular outreach work to detect children at risk of human trafficking. While welcoming the adoption of the reform of the child protection system, which paves the way for establishing a system capable of supporting children in vulnerable situations, GRETA considers that the authorities should take additional measures to prevent trafficking of children and young people. This should include strengthening the enforcement of legal safeguards against harmful and prohibited child labour, and developing early detection mechanisms and regular outreach work to detect children at risk of becoming victims, including to trafficking facilitated by ICT.

Members of the Yezidi minority are particularly vulnerable to THB. There are higher rates of school dropout, child marriage and bridal kidnapping among members of this minority in rural areas. With a view to reducing instances of child marriages, the Family Code was revised in September 2024 to set the minimum age for marriage at 18 without exceptions. Specific measures have also been taken to improve school attendance. GRETA considers that the authorities should make additional efforts to prevent human trafficking of members of disadvantaged minorities, including by improving their access to education, strengthening awareness raising and training of relevant professionals. The authorities should also involve organisations representing ethnic minorities in the design and implementation of anti-trafficking policies.

Persons with disabilities face significant challenges in their inclusion, particularly in terms of access to education, work and independent living, which leaves them vulnerable and exposed to abuse by traffickers. Several persons with disabilities and/or with mental health issues were identified among victims of human trafficking in Armenia. GRETA considers that the authorities should make additional preventive efforts, including through research, awareness raising and measures aimed at the social inclusion of persons with disabilities. The authorities should also implement mechanisms for detecting, preventing and responding

to violence, exploitation and abuse against persons with disabilities in institutions.

The number of migrant workers in Armenia has significantly increased, particularly from India. Many of them work in the informal economy, without work permits, on low skilled jobs in sectors such as construction, agriculture, delivery and services. Abusive practices by recruitment agencies and limited oversight of companies make migrant workers particularly vulnerable to exploitation. GRETA urges the Armenian authorities to extend the mandate of the labour inspectorate and provide it with adequate resources to enable it to conduct proactive and unannounced inspections in all workplaces, including unregistered companies and informal workplaces. It also calls on the authorities to prohibit recruitment fees and related costs borne by workers or jobseekers, regulate and monitor recruitment and temporary work agencies, and ensure that migrant workers have access to safe reporting mechanisms and effective anonymous complaint mechanisms.

In recent years, the number of persons seeking international protection in Armenia has grown, generating increased pressure on public services. GRETA welcomes the efforts made to improve the inclusion of refugees from Karabakh. However, it notes that, in general terms, access to accommodation and employment is particularly challenging for asylum seekers and refugees in Armenia. GRETA considers that the authorities should put in place procedures for the vulnerability assessment of asylum seekers and refugees, improve their social integration, and further develop the training of staff in the Migration and Citizenship Service. The authorities should also strengthen the rules on the appointment of legal guardians for unaccompanied or separated children and provide such children with safe accommodation.

Further, GRETA considers that the authorities should take additional measures to reduce the vulnerabilities to human trafficking of persons engaged in prostitution, including by abrogating the administrative offence of engaging in prostitution and developing exit programmes for persons wishing to leave prostitution.

With a view to improving the formal identification of victims of human trafficking, indicators for the Victim Identification Commission (VIC) were adopted in 2022. Efforts have also been made to improve the guidelines and training of different categories of professionals, and to expand the number of NGOs that can refer possible victims for identification. While welcoming these positive developments, GRETA is concerned that insufficient efforts are made to proactively detect victims of trafficking. GRETA urges the authorities to reinforce the role of labour inspectors and staff of the Unified Social Services in the detection of victims, improve the identification of victims among migrant workers, asylum seekers, refugees and migrants in irregular situation, as well as establish mechanisms for the early detection of victims of THB, such as mobile units, in co-operation with civil society organisations. GRETA also considers that the authorities should review the threshold of proof applied by the VIC to formally identify victims and ensure regular training on identifying victims of trafficking for relevant professionals.

In 2022, the government adopted a decision defining minimum quality standards for the provision of services to victims of human trafficking, and an evaluation of the support programme was conducted in 2023. However, GRETA expresses concern over the decrease in funding for victim support and considers that the authorities should provide adequate and sustainable state funding to NGOs which have been delegated the assistance of victims of THB. The authorities should also strengthen support to victims in accessing the labour market and housing and improve specialised care and psychological support.

GRETA welcomes the application of the concept of abuse of a position of vulnerability in case-law on THB and invites the Armenian authorities to continue providing training and guidance to relevant professionals in this regard.

Following the entry into force of the new Code of Criminal Procedure in 2022, the Police is responsible for detecting possible criminal offences and the Investigative Committee conducts the criminal investigation under the supervision of prosecutors. Further, the threshold to start an investigation was lowered. GRETA positively notes the efforts to develop the training provided to police officers, investigators, prosecutors and judges. While the number of investigations in cases of THB has increased, this has not been matched by an increase in convictions. GRETA calls on the Armenian authorities to ensure that human trafficking

offences are proactively and promptly investigated, regardless of whether a complaint about the reported crime has been submitted or not, by making use of special investigation techniques. It also considers that authorities should ensure that all human trafficking cases are prosecuted as such, rather than as lesser offences, and ensure that the length of court proceedings is reasonable.

GRETA welcomes the existence of a wide range of protection measures for victims of THB, the development of child-friendly procedures and the setting up of two Barnahus centres. However, it underlines that protection measures envisaged in law should be implemented in practice, including the possibility to testify through audiovisual means and to accept the previously recorded testimony of child victims as evidence. GRETA considers that the authorities should provide further training to investigators, prosecutors and judges on protection measures and trauma-informed interviews, amend the legislation on Barnahus centres, and expand the number of psychologists licensed and trained to participate in interviews of child victims.

Pursuant to the CC, the non-punishment provision is limited to offences of minor and medium gravity which victims were forced to commit while being in a situation of trafficking or exploitation. Noting that little efforts have been made since the previous evaluation round, GRETA urges the Armenian authorities to take further measures to ensure that the non-punishment provision is capable of being applied to all offences and to develop guidance for police officers and prosecutors on the scope and application of the non-punishment provision.

The Armenian authorities have noted an increase in the use of ICT to recruit and exploit victims of trafficking. There are concerns regarding sexual exploitation of children online, as well as fraudulent job offers on the Internet to recruit victims for both labour and sexual exploitation. While welcoming the efforts made to strengthen online safety and improve investigations of cases of human trafficking facilitated by ICT, GRETA considers that the Armenian authorities should invest in capacity building and digital tools for investigators and develop co-operation with ICT companies and Internet service providers in order to prevent ICT-facilitated trafficking, identify victims and collect evidence.

Armenian legislation continues to limit access to legal assistance and free legal aid to formally identified victims of THB. GRETA once again urges the authorities to ensure that legal assistance is provided as soon as there are reasonable grounds for believing that a person is a victim of human trafficking, before the person concerned has to decide whether or not he/she wants to co-operate with the authorities and/or make an official statement. Further, GRETA considers that the authorities should ensure that adequate resources are made available for the provision of legal assistance and free legal aid to victims of trafficking and continue providing training to lawyers assisting victims.

Access to compensation for victims of human trafficking continues to be ineffective in Armenia. During the reporting period, no victims were granted compensation from the perpetrators. Further, state compensation continues to be conditioned on the victims' acceptance of other assistance measures. Its amount (equivalent to approximately EUR 555) has not increased and does not take into account the damages suffered by victims, making it more of a financial aid than a proper state compensation scheme. GRETA once again urges the authorities to guarantee access to compensation for victims of trafficking, including by ensuring that the collection of evidence about the harm suffered by the victim is part of the criminal investigation, making full use of the legislation on the freezing and forfeiture of assets and international co-operation to secure compensation, and introducing a mechanism to guarantee compensation of victims by the State.

General information on trafficking in human beings in Armenia (covering the period from 2022 until 2025)

Entry into force of the Council of Europe Convention on Action against Trafficking in Human Beings	1 August 2008
Previous evaluations by GRETA	• First evaluation report (published on 21 September 2012) • Second evaluation report (published on 20 March 2017) • Third evaluation report (published on 31 May 2022)
Co-ordination of national action against THB	• Anti-Trafficking Interministerial Council, chaired by a Deputy Prime Minister • Anti-Trafficking Working Group, subordinated to the Council and responsible for the operational co-ordination of activities
National Rapporteur on THB	There is no designated National Rapporteur.
Specialised bodies	• Victim Identification Commission (VIC) • Ministry of Labour and Social Affairs Department for Human Trafficking and Women's Issues • Police Anti-Trafficking Unit • Investigative Committee • General Prosecutor's Office Department for Crimes against Human Beings
National Strategy/Action Plan	The 7 th National Action Programme (NAP) for Organisation of the Fight Against Trafficking and Exploitation of Human Beings for 2023-2025 was approved in January 2023.
Relevant legislation	• Law on Identification and Support to Persons Subjected to Trafficking in Human Beings and Exploitation • Criminal Code: Articles 188 (trafficking and exploitation of human beings, including non-punishment provision), 189 (trafficking and exploitation of children and helpless persons) and 190 (use of services of trafficked persons) • Labour Code: Article 3.2 (compulsory or forced labour) • Law on Foreigners
National Referral Mechanism (NRM)	The NRM was approved in 2008 and last revised in 2015. The Ministry of Labour and Social Affairs supervises its implementation. The identification procedure consists of two phases: (1) pre-identification which can be done by the Ministry of Labour and Social Affairs, the Police, and authorised NGOs; (2) formal identification by the VIC consisting of three representatives from the authorities and three from NGOs.
Trafficking profile	Armenia is affected by both internal trafficking and cases involving Armenian nationals exploited abroad. In 2022-2025, 90 victims of trafficking were identified, including 22 children. Labour exploitation (which includes exploitation in begging) has become the predominant form of exploitation, followed by sexual exploitation. Most identified victims were Armenian citizens trafficked internally.

I. Introduction

1. Since the ratification of the Council of Europe Convention on Action against Trafficking in Human Beings on 14 April 2008, the Armenian authorities have taken a series of steps to develop the legislative, institutional and policy framework for action against trafficking in human beings (THB) in the light of the obligations under the Convention. These steps include the adoption of a comprehensive Law on Identification and Support to Persons Subjected to Trafficking in Human Beings and Exploitation, and amendments to the Criminal Code (CC) and Code of Criminal Procedure (CCP). Further, the authorities have regularly adopted multiannual national action plans on fighting THB. Efforts have also been made to train various categories of professionals who may be in contact with victims of trafficking and to develop specialisation amongst police officers, investigators and prosecutors to work on human trafficking cases. However, after three rounds of evaluation, GRETA concluded that there were continuing gaps in certain areas, such as the prevention and detection of trafficking for labour exploitation, the provision of assistance to victims and their access to compensation, as well as the criminal justice response to THB.

2. On the basis of GRETA's third report, on 17 June 2022 the Committee of the Parties to the Convention adopted a recommendation to the Armenian 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 Armenian authorities was considered at the 34th meeting of the Committee of the Parties (21 June 2024) and was made public.²

3. On 28 June 2024, GRETA launched the fourth round of evaluation of the Convention in respect of Armenia by sending the questionnaire for this round to the Armenian authorities. The deadline for submitting the reply to the questionnaire was 28 October 2024 and the authorities' reply was received on 1 November 2024.

4. An evaluation visit to Armenia took place from 14 to 18 April 2025 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:

- Ms Tatiana Catana, member of GRETA;
- Ms Rita Penedo, member of GRETA;
- Ms Parvine Ghadami, Administrator in the Secretariat of the Convention.

5. During the visit, the GRETA delegation met Ms Tatevik Stepanyan and Mr Ruben Sargsyan, Deputy Ministers of Labour and Social Affairs, Mr Armen Ghazaryan, Deputy Minister of Internal Affairs, Mr Robert Abisoghomonian, Deputy Minister for Foreign Affairs, and Ms Anna Karapetyan, Deputy Minister of Justice, as well as officials of the Ministry of Labour and Social Affairs (including the Health and Labour Inspectorate), the Ministry of Internal Affairs (including the Police), the Ministry of Foreign Affairs, the Ministry of Justice, the Ministry of Education, Science, Culture and Sport, the Ministry of Health, the Ministry of High-tech Industry, the Ministry of Defence, and the Statistical Committee. Discussions were also held with members of the Working Group on Combating Trafficking in Human Beings, representatives of the General Prosecutor's Office, the Investigative Committee and the Public Defender's Office, as well as judges of the Criminal Court of Appeal and Yerevan City Court. Furthermore, the GRETA delegation met Ms Anahit Manasyan, Human Rights Defender of Armenia, and members of her office. A meeting was also held with members of Parliament.

² Report submitted by the Armenian authorities on measures taken to comply with Committee of the Parties Recommendation CP/Rec(2022)01 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings, available at: <https://rm.coe.int/report-submitted-by-the-armenian-authorities-on-measures-taken-to-comp/1680b086ed>.

6. In addition to having meetings in Yerevan, the delegation travelled to the Kotayk region where it met representatives of the regional social services, Investigative Department and Police.
7. The GRETA delegation held separate meetings with non-governmental organisations (NGOs), independent experts, and representatives of the International Organization for Migration (IOM), the United Nations Children's Fund (UNICEF) and the United Nations Refugee Agency (UNHCR).
8. In the course of the visit, GRETA's delegation visited a shelter for victims of trafficking and a Children's House (Barnahus) in Yerevan, as well as a residential institution for children without parental care and a reception centre for asylum seekers in Abovyan (Kotayk region).
9. 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.
10. GRETA wishes to place on record the co-operation provided by the Armenian authorities and in particular by the contact person appointed to liaise with GRETA, Ms Karine Sujayan, Head of the Human Rights and Humanitarian Issues Department of the Ministry of Foreign Affairs, as well as Ms Sofya Margaryan of the same department, and Ms Sofi Bostanchyan, Head of the Department of Human Trafficking and Women's Issues of the Ministry of Labour and Social Affairs.
11. The draft version of the present report was approved by GRETA at its 55th meeting (17-21 November 2025) and was submitted to the Armenian authorities for comments. The authorities' comments were received on 10 February 2026 and were taken into account by GRETA when adopting the final report at its 56th meeting (2-6 March 2026). The report covers the situation up to 6 March 2026; 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

12. Armenia continues to be primarily a country of origin for trafficked persons but is also a country of destination for Armenian nationals trafficked internally, as well as for foreign nationals. A total of 90 persons were granted the status of victim of trafficking in 2022-2025 (6 in 2022, 25 in 2023, 25 in 2024 and 34 in 2025), including 22 children (for more details, see the table in Appendix 1).³ The majority of the identified victims were female, except in 2025 when more male victims were identified. Most identified victims were Armenian nationals (84%), trafficked predominantly internally and to a lesser extent to the Russian Federation.⁴

13. As regards emerging trends, labour exploitation has become the predominant form of human trafficking amongst identified victims (63 out of 90). There has been an increase in the number of foreign nationals referred to the Victim Identification Commission (VIC) on suspicions of labour exploitation; in some instances it was found that the cases did not amount to human trafficking (see paragraphs 66 and 103), however, an important group of migrant workers from Tajikistan (13) were formally identified as victims in 2025. There have also been cases of exploitation in begging which are included in the statistics on labour exploitation. As regards sexual exploitation, there have been cases involving very young children exploited through ICT for the production of sexual abuse material.

14. In September 2023, following a military operation launched by Azerbaijan in Karabakh, approximately 115 000 ethnic Armenians fled to Armenia in a space of only few days. This generated significant challenges for the Armenian authorities (see paragraphs 83-0). Most of the refugees from Karabakh have remained in Armenia since then. To date, no victims of trafficking have been identified among them.

15. There have been several changes to the legislative framework relevant for action against human trafficking. The new Criminal Code (CC), adopted in 2021 and in force since 1 July 2022, introduced new provisions on human trafficking (see paragraphs 129-130 and 153).⁵ Further, amendments to the Law on Identification and Support to Persons Subjected to Trafficking in Human Beings and Exploitation (hereafter, "Anti-Trafficking Law") were passed, notably to align the definition of human trafficking with the new CC.

16. A definition of "compulsory or forced labour" was introduced following a revision of the Labour Code in October 2022 (see paragraph 73). A legislative package on the protection of the rights of the child (see paragraph 35), which was introduced in 2022, was finally adopted on 22 October 2025.

17. Pursuant to the revised Anti-Trafficking Law, on 6 October 2022, a government decision was adopted establishing indicators for granting the status of victim of human trafficking by the VIC, and another one setting minimum standards for the specialised shelter and other assistance measures for victims of trafficking (see paragraphs 100 and 119). In 2024, amendments were made to Government Decision No. 851-N revising the procedure for the selection of NGOs involved in the National Referral Mechanism (see paragraph 104).

³ By way of comparison, during the previous reporting period, 11 victims were formally identified in 2017, 9 in 2018, 8 in 2019, 9 in 2020 and 31 in 2021. See GRETA's 3rd report on Armenia, paragraph 12.

⁴ The data on Armenian nationals exploited abroad only relates to those who were formally identified upon return to Armenia and does not include those who were identified in other countries.

⁵ The new provisions on human trafficking (Article 188 and 189, replacing the previous Articles 132 and 132.2) were described in GRETA's 3rd report, when they had been adopted but had not yet entered into force. Several substantial changes were made including the definition of exploitation which now explicitly includes forced criminality and the removal of human cells, tissue or fluids. See GRETA's 3rd report on Armenia, paragraph 15.

18. The institutional framework for action against THB remains as described in GRETA's 3rd report.⁶ The Inter-ministerial Council on Issues of Trafficking and Exploitation of Human Beings (hereinafter, "the Anti-Trafficking Council"), which is chaired by one of the Deputy Prime Ministers, is a high-level body responsible for developing and co-ordinating anti-trafficking policies. During the reporting period, it met only twice, in 2022 and 2025. GRETA underlines the importance of holding regular high-level meetings to maintain the fight against trafficking among the priorities of the political agenda.

19. Subordinated to the Anti-Trafficking Council, the Inter-agency Working Group on Combating Trafficking in Human Beings (hereinafter, "the Anti-Trafficking Working Group" is responsible for implementing and monitoring the National Action Plan against human trafficking. It includes representatives of relevant governmental bodies, NGOs and intergovernmental organisations.⁷ Its Secretariat is provided by the Ministry of Labour and Social Affairs (Department of Human Trafficking and Women's Issues). The working group usually meets twice a year, except in 2022 and 2025 when it met more frequently to develop the 7th and 8th NAPs respectively.

20. Following the revision of the Code of Criminal Procedure (CCP) in 2022, the police is responsible for detecting or uncovering criminal offences, while the Investigative Committee is in charge of investigations, under the supervision of the General Prosecutor's Office (see paragraph 135).

21. GRETA was informed that there continues to be a high turnover of professionals involved in the fight against human trafficking, notably among frontline actors, which hinders effective co-ordination and sustainability of capacity building efforts. Further, there are no mechanisms for multi-agency co-ordination at local and regional level. In their comments on the draft report, the Armenian authorities underlined that the 49 territorial centres of the Unified Social Services (USS) play an important role in ensuring interdepartmental co-operation at the local level for the early detection, identification and assistance to victims. GRETA considers that the Armenian authorities should strengthen inter-agency co-ordination at local and regional level with a view to strengthening the prevention of human trafficking and the protection of victims.

22. There is still no independent National Rapporteur on trafficking in human beings in Armenia.⁸ The 7th National Action Plan envisages the designation of the Human Rights Defender (Ombudsperson) as a National Rapporteur, but due to the lack of funding, this has been delayed. GRETA considers that the Armenian authorities should finalise the process of establishing an independent National Rapporteur, supported by dedicated funding, with a view to ensuring an effective monitoring of the anti-trafficking activities of state institutions and making recommendations to persons and institutions concerned.

23. The authorities have continued adopting multiannual National Action Plans (NAP) for the Fight against Trafficking and Exploitation of Human Beings. Thanks to funding from the United States Agency for International Development (USAID), the implementation of the 6th NAP (2020-2022) was subject to an external evaluation, published in June 2022.⁹ The evaluation report made recommendations for the development of the next NAP, including establishing a monitoring system with performance indicators, outcomes and data collection tools; creating mechanisms for sharing information and enhancing collaboration between anti-trafficking actors; and developing a sustainable capacity-strengthening framework for agencies involved in the protection of trafficked persons. GRETA welcomes the external evaluation of the 6th NAP and invites the Armenian authorities to continue commissioning external evaluations of the implementation of the NAPs as a tool for assessing the impact of the activities and for planning future policies and measures to combat trafficking.

⁶ See GRETA's 3rd report on Armenia, paragraphs 18-21.

⁷ See GRETA's 3rd report on Armenia, paragraphs 18-19; GRETA's 2nd report on Armenia, paragraphs 17-18.

⁸ See GRETA's 3rd report on Armenia, paragraph 21.

⁹ Evaluation report available (in English) at : https://www.data4impactproject.org/wp-content/uploads/2022/09/C-TIP-Expert-Assessment-Brief-Final_508.pdf.

24. The 7th NAP (2023-2025) was approved in January 2023 by a decision of the Armenian government. It has seven main areas: (1) improving the legislation to combat human trafficking and exploitation; (2) preventing human trafficking and exploitation; (3) preventing child trafficking and exploitation; (4) identifying, protecting and assisting persons who have been trafficked or exploited; (5) international co-operation; (6) conducting research; (7) monitoring and evaluation. Progress reports were prepared by the Ministry of Labour and Social Affairs and adopted by the Anti-Trafficking Working Group in 2023 and 2024, and a new progress report for 2025 is about to be finalised.

25. The 7th NAP has a dedicated budget of approximately AMD 43 million (around EUR 98 000), which includes the assistance programme (for 2024, around AMD 33 million or EUR 75 000) and the state compensation programme (AMD 1.75 million, around EUR 4 000). The remaining part (around AMD 8 250 000 or EUR 19 000) is used to fund other activities, such as training and the production of awareness-raising materials. Certain activities are also funded directly by the budgets of the ministries responsible for their implementation. Over the years, several measures of the NAPs have been financially supported by international donors, in particular the US Government. GRETA notes with concern that, unless alternative funding is found, the decision of the US Government to suspend international funding will negatively impact the implementation of anti-trafficking activities in Armenia. In their comments on the draft GRETA report, the Armenian authorities stated that they funded the implementation of a number of additional activities through the state budget, without providing details on the funds provided. GRETA considers that the Armenian authorities should ensure the allocation of adequate and sustainable funding for the implementation of the National Action Plans and related anti-trafficking activities.

26. In their comments on the draft report, the Armenian authorities indicated that the 8th NAP on human trafficking for 2026-2028 was prepared by the Anti-Trafficking Working Group in 2025 and is about to be finalised. GRETA would like to be kept informed of the adoption of the 8th NAP.

27. The authorities also indicated that efforts have been made to strengthen the interagency co-ordination, monitoring and reporting in relation to Armenia's international commitments in the fields of human rights and combating human trafficking, through a specific digital platform launched in December 2025.¹⁰

¹⁰ www.ai-nemra.am (available in both Armenian and English).

III. Addressing vulnerabilities to trafficking in human beings

1. Prevention of trafficking in human beings

a. Introduction

28. Prevention is crucial in combating trafficking in human beings. 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 trafficking in human beings, 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.

29. In Armenia, the most common vulnerability factors abused by traffickers are poverty, poor housing conditions, unemployment, lack of education and isolation. Children and young people are vulnerable to sexual and labour exploitation, as well as exploitation in begging. Girls and women of the Yezidi minority are vulnerable to child, early and forced marriage. Further, children and young people leaving alternative care, as well as persons with disabilities and/or mental disorders, are vulnerable to THB for different forms of exploitation.

30. In recent years, the number of migrant workers in Armenia has significantly increased. Abusive practices by recruitment agencies and limited oversight of companies make migrant workers particularly vulnerable to trafficking and exploitation by their employers or recruiters. Armenians looking for work opportunities abroad are also vulnerable to THB. In addition, the number of persons seeking international protection in Armenia has grown, particularly with 115 000 persons from Karabakh since 2023, and the difficulties they face in their integration increase their vulnerability.

31. The external evaluation of the 6th NAP published in 2022 (see paragraph 23) noted that most activities were aimed at preventing the consequences of trafficking rather than addressing the root causes, and recommended greater efforts into identifying the most vulnerable groups, developing multisectoral strategies and making structural adjustments to reduce vulnerabilities.¹¹ The 7th NAP refers to vulnerable groups but fails to clearly define them and does not specify activities to address vulnerabilities. Further, no research on vulnerabilities to human trafficking have been conducted. The Armenian authorities indicated that the 8th NAP, which is pending adoption, focuses on addressing vulnerabilities to human trafficking and identifies specific target groups (children and youth, migrants, refugees, persons with disabilities). It also envisages the conduct of research into trafficking facilitated by ICT, vulnerabilities to THB of different groups in Armenia, as well as the prevention of child sexual exploitation and abuse. GRETA welcomes the focus of the draft 8th NAP and invites the Armenian authorities to ensure that the findings and recommendations of research are taken into account in the design and implementation of preventive policies and activities.

¹¹ Counter-Trafficking in Persons (C-TIP) Expert Assessment Report, Data for Impact, p. 26.

32. In the framework of an evaluation of the support programmes for victims of THB (see paragraph 122122), a survey was conducted among 10 survivors of THB who were assisted in 2022-2023, with a view to learning about their experience and expectations. Noting the importance of taking into account the lived experiences and views of victims and survivors of trafficking when designing anti-trafficking policies and measures, GRETA invites the Armenian authorities to set up a trafficking survivors' advisory council. Reference is made in this context to the ODIHR Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils¹² and ICAT's Issue Brief on Ensuring Ethical Survivor Inclusion.¹³

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

33. This section examines the preventive measures taken with regard to certain vulnerable groups on the basis of the information provided by the Armenian 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 and young people*

34. Prevention of trafficking of children has been amongst the priorities of the NAPs for combating trafficking in human beings. Additional measures aimed at reducing children's vulnerabilities are included in the draft Comprehensive Programme for the Protection of the Rights of the Child 2024-2029 which was presented in June 2024 by the Government but is still pending adoption by the National Assembly.

35. A comprehensive reform of Armenia's child protection system has been under consideration for several years. The draft legislative package on the protection of the rights of the child was introduced by the Government in November 2022,¹⁴ and was finally adopted on 22 October 2025. Drafted with the support of UNICEF, the reform aims at aligning the legal framework with international standards, notably in relation to the principle of the best interests of the child, the protection of children from violence and the right to alternative care in a family environment. The reform restructures the child protection system, with child protection units and specialised social workers at the community level, and clarifies the responsibilities of relevant actors. It also proposes to review the foster care and adoption systems. At the time of adopting the final GRETA report on Armenia (March 2026), secondary legislations to ensure the implementation of the reform were being prepared.

36. Numerous awareness raising activities on human trafficking are being conducted for schoolchildren, in co-operation with NGOs.¹⁵ As part of the social sciences programme for 9th and 11th grades, several hours are specifically devoted to human trafficking. From 5th to 11th grades, the course on 'Healthy lifestyles' addresses various harmful situations, including sexual violence and exploitation, early marriage, early pregnancy and sexually transmitted infections.

¹² OSCE/ODHIR, *Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils*, 2024.

¹³ ICAT, *Ensuring Ethical Survivor Inclusion*, Issue Brief, 2025.

¹⁴ The legislative package includes the Law on the Rights of the Child and the Child Protection System as well as amendments to the Family Code, the Civil Code, the Code of Civil Procedure and the Law on Local Self-government. Available at (in Armenian): <https://www.e-draft.am/projects/4936/about>.

¹⁵ See the Armenian authorities' reply to the GRETA questionnaire for the 4th evaluation round, pp. 8-9; the Armenian authorities' report to the Committee of the Parties, p. 11-12.

37. The authorities have provided detailed information on training and capacity building activities organised for professionals working with children, including teachers, social workers, staff of institutions for children and day care centres.¹⁶ Information seminars on the identification and assistance to victims, as well as on trafficking facilitated by ICT were organised for educational staff. Other training activities, organised in co-operation with UNICEF, were conducted for staff of children's institutions on sexual violence, online crimes against children and assessing the best interests of the child. Further, thanks to USAID funding, the NGO World Vision Armenia developed guidelines for staff in educational institutions on preventing and responding to violence against children which include information on child exploitation and trafficking.¹⁷ In addition, in 2025, the Ministry of Education developed a Handbook on the Protection and Safety of Children from Violence at School.

38. A working group on the risks of human trafficking, forced labour and exploitation of children from socially vulnerable groups was set up in 2023 upon the initiative of the NGO UMCOR Armenia. Bringing together representatives of public bodies and civil society, the working group met twice to assess the factors contributing to the vulnerability of children. GRETA was informed that several of its recommendations were included in the draft legislative package on the protection of the rights of the child.

39. In March 2025, with a view to reducing poverty, a new pilot system was launched in the Syunik and Kotayk regions for assessing the vulnerabilities of families,¹⁸ and it is planned to expand it to the entire country in July 2026. Under the new system, four levels of vulnerabilities have been introduced (extremely vulnerable, moderately vulnerable, medium vulnerable and vulnerable), depending on which different vulnerability benefits are provided.

40. In 2023, police officers of the Department for Juvenile Affairs and Prevention of Domestic Violence conducted outreach operations to detect cases of children in situation of vagrancy or begging.¹⁹ Five cases were detected. Noting that the outreach operations were conducted at quarterly intervals, GRETA underlines the importance of conducting regular outreach work to detect children at risk of human trafficking, for instance through the setting up of dedicated mobile units.

41. In April 2024, Government Decision No. 479-N "On the Procedure for Referring a Child Victim of Violence to the Relevant Authorities for Protection or Assistance, the Forms of Assistance Provided to a Child Victim of Violence, and the Procedure for Providing Such Assistance" was adopted.²⁰ While this new procedure represents a significant step forward, the Armenian authorities have acknowledged that its implementation is hampered by the lack of early detection mechanisms.²¹ In a report published in 2025, the Human Rights Defender emphasised that the procedure does not address the specificities of certain forms of violence, particularly those committed through ICT, and that educational professionals are often unaware of it. The report also criticized the lack of funding, data and monitoring system to ensure the implementation of the procedure.²² These gaps should be addressed following the adoption of the reform of the child protection system (see paragraph 33) which obliges any entity or professional who detect a case of violence to refer the case to the police within 12 hours, and the government to establish a procedure for identifying and referring children who are subjected to violence. In their comments on the draft GRETA report, the authorities also underlined that the recommendations on the assessment of the NRM (see paragraph 106) should help develop a new system for the early identification of children at risk of human trafficking.

¹⁶ Ibidem.

¹⁷ Available (in Armenian) at: <https://www.wvi.org/publications/armenia/child-protection-guide-teachers>.

¹⁸ <https://www.unicef.org/armenia/en/press-releases/introduction-new-family-vulnerability-assessment-system-armenia>.

¹⁹ See the 2023 Monitoring report of the anti-trafficking NAP 2023-2025, February 2024, p. 15.

²⁰ Available (in Armenian) at: <https://www.arlis.am/hy/acts/191544>.

²¹ Comprehensive Programme for the Protection of the Rights of the Child 2024-2029, paragraph 34.

²² *Urgent report on problems related to the detection, prevention and response to violence against children in Armenia*, Human Rights Defender, 2025, p. 8. Available (in Armenian) at: <https://ombuds.am/am/site/ViewNews/3312>.

42. Children placed in alternative care and young people leaving child protection institutions once reaching the age of majority are particularly vulnerable to human trafficking. Reference was made to the case of a young woman who left a childcare institution at the age of 18, without family support, and ended up being exploited on a farm. At the time of the authorities' comments on the draft report (February 2026), the case was awaiting trial. GRETA was also informed of cases of children who, while being placed in childcare institutions, were involved in begging by their parents. The Armenian authorities referred to the training provided to staff of these institutions (see paragraph 0), as well as the transition to a community-based or family-based support model. According to several interlocutors met by GRETA, there has been progress in implementing the de-institutionalisation reform in Armenia, with most care institutions having been transformed into community-based support and a significant increase in the number of foster families. However, there remain more than 1 200 in children in childcare institutions, particularly children with disabilities.²³ In their comments on the draft report, the authorities indicated that in 2025, 205 children received care in 112 foster families and for the first time foster care contracts were signed with 20 foster families. Further, there are 6 children and family centres providing support in the community which are inclusive of children with disabilities and have a mobile component in order to reach children and families who are not in the city where the centre is located. The authorities also underlined that efforts were made to support young adults leaving childcare institutions after reaching 18, in particular financial assistance equivalent to the National Minimum Wage and rent reimbursement assistance are both provided monthly for a period of 12 months.²⁴ The authorities also noted that an orphanage was closed.²⁵

43. GRETA was informed that there are shortcomings in relation to the procedure for appointing legal guardians, the minimum standards of potential candidates, but also regarding the responsibilities, training, remuneration and termination of duties of legal guardians. Further, there is limited monitoring and oversight of alternative care.²⁶ Guardianship and trusteeship commissions exist at the local level as a consultative body to take decisions in order to protect children, including the supervision of alternative care and legal guardians. However, they lack resources and are not necessarily composed of social workers or child protection professionals, especially in rural areas. The consequences for foreign unaccompanied or separated children are explained in paragraph 86.

44. GRETA visited an institution for children and young people without parental care, or at risk of losing it, run by the NGO "SOS Children Village" in the Kotayk Region. At the time of the visit, it was taking care of 55 children, including 12 who were accommodated at the institution and 43 who were living with their families or independently. Upon turning 18, young people can continue receiving support through the supervised-independent living programme which is available until the age of 23. GRETA was told that all staff are sensitised on THB as part of training courses on protecting children from sexual abuse and incident management, but they have not received a specific training on human trafficking. There is a child safeguarding staff who is responsible for dealing with cases or risks of abuse against children, including trafficking, but so far, no cases have been identified. Children are sensitised on all forms of violence and have internal hotlines to report their cases.

²³ Comprehensive Programme for the Protection of the Rights of the Child 2024-2029, paragraph 126.

²⁴ Based on Government Resolution No. 1007 of 22 June 2023.

²⁵ The director of the orphanage had been accused of corruption: <https://www.anticorruption.am/en/post/former-director-of-gavar-orphanage-accused-of-illegal-participation-in-entrepreneurial-activity-criminal-proceedings-referred-to-court>.

²⁶ Urumova I., *Needs assessment report on Armenia's deinstitutionalisation and child protection reform including the protection of the rights of unaccompanied and separated children*.

45. Amendments to the Labour Code were passed in May 2023 introducing safeguards against harmful and prohibited child labour. In particular, the new Article 17.1 of the Labour Code prohibits the permanent employment of children under 16 and authorises temporary work which does not interfere with their education and does not endanger their health. Children under the age of 14 can only be involved in artistic work. There is a lack of official data on child labour.²⁷ GRETA was informed that the Health and Labour Inspectorate had detected 10 cases of violations of child labour rules in 2022-2024. The enforcement of labour laws is hampered by the limited mandate of labour inspectors who cannot conduct unannounced inspections and visit informal workplaces such as small family farms (see paragraphs 71 and 76). Recognising these gaps, the draft Comprehensive Programme for the Protection of the Rights of the Child envisages in-depth research into prohibited, forced and harmful child labour in Armenia and annual actions plans on the issue.²⁸

46. Acknowledging the risks of human trafficking and exploitation of children who are out of school, the 7th NAP includes information on school dropout. The procedure for identifying and referring children who are not following compulsory education²⁹ was amended in 2024, introducing an obligation to collect data on such children and make it available to the guardianship and trusteeship commissions so that they can take measures. A new electronic system to monitor school attendance was also established in 2024. However, GRETA was informed that school attendance remains an issue of concern, notably in rural areas, as well as among disadvantaged minorities (see paragraph 51), children with disabilities and refugee children. In their comments on the draft report, the Armenian authorities indicated that the electronic system was upgraded in 2025 to record absences of children at risk of dropping out of school and therefore enabling to react more rapidly to risk cases

47. While welcoming the adoption of the long-awaited reform of the child protection system, which paves the way for establishing a system capable of supporting children in vulnerable situations, GRETA considers that the Armenian authorities should take additional measures to prevent trafficking of children and young people, including by:

- ensuring that the implementation of the reform of the child protection system is guaranteed by the necessary secondary legislation;
- increasing the funding, resources and capacities of the bodies responsible for the protection of children, in particular guardianship and trusteeship commissions, to enable them to play an effective role in the prevention of child trafficking;
- reducing the risks of trafficking in children and young people placed in alternative care or leaving alternative care, including by developing a monitoring system of alternative care providers;
- developing early mechanisms and regular outreach work to detect children at risk of becoming victims of human trafficking, including trafficking facilitated by ICT (see also the recommendation in paragraph 113);
- strengthening the enforcement of legal safeguards against harmful and prohibited child labour, including through prevention, effective control and referral of cases. The involvement of labour inspectors in preventing and combating child labour should be strengthened (see also the recommendation in paragraph 77);

²⁷ See Dr Smusz-Kulesca M., *Reports on the needs assessment in respect of social rights in Armenia*, Council of Europe, 2024, p. 47.

²⁸ Comprehensive Programme for the Protection of the Rights of the Child 2024-2029, paragraph 55.

²⁹ Decision of the Government No. 154-N of 11 February 2021 "On determining the procedure for identifying and referring children out of compulsory education", as amended in 2024.

- strengthening prevention of, and response to, cases of children who are out of school;
- continuing to raise awareness of children, parents and foster families of the risks of human trafficking, paying particular attention to vulnerable children, such as children placed in alternative care, children from disadvantaged minorities, children with disabilities and children who are out of school;
- continuing to provide training on trafficking in human beings and its different forms to professionals working with children, in particular teachers, school staff, social workers and members of guardianship and trusteeship commissions.

ii. Disadvantaged minorities

48. According to the last available census (2022), ethnic Armenians make up about 98% of the country's population. The remaining 2% is made up of 11 ethnic minorities which are very diverse and scattered around the country, but the main one is the Yezidi minority (31 079 persons), predominantly living in rural areas.³⁰

49. As already noted in previous GRETA reports, members of the Yezidi minority are particularly vulnerable to human trafficking in Armenia.³¹ According to the authorities, information sessions and campaigns on THB were carried out in regions where minorities are present.³² GRETA notes that organisations representing ethnic minorities are not involved in the development and implementation of anti-trafficking policies.

50. There is no national strategy or other policy document on minorities in Armenia. Measures aimed at improving their rights and integration are included in other sectoral or more general documents, such as the National Strategy on the Protection of Human Rights and its dedicated action plans which give priority to adopting the Law on National Minorities which has been pending for several years and has still not been adopted.³³

51. There is reportedly a higher rate of school dropout, child marriage and bridal kidnapping among members of the Yezidi minority in rural areas.³⁴ Child marriage predominantly occurs within the Yezidi community or in *marzes* (regions) where minority ethnic groups live. Within the Yezidi community, it is more common for girls to marry between the ages of 13-14 and for boys between the ages of 17-20. Marriages are often arranged by parents.³⁵ Girls from the Yezidi minority often drop out of school following their marriage or, conversely, parents may prevent their child from going to school with a view to avoiding bridal kidnapping. Forced marriage and forced pregnancy have been criminalised since 2022 (Article 197 of the CC). Further, with a view to reducing instances of child marriages, the Family Code was revised in September 2024 to set the minimum age for marriage at 18 without exceptions. While welcoming this

³⁰ Source: Statistical Committee. Distribution by ethnicity is based on self-determination by respondents. <https://www.armstat.am/en/?nid=82&id=2623>.

³¹ See GRETA's 2nd report on Armenia, paragraph 70; GRETA's 3rd report on Armenia, paragraph 168.

³² See the Armenian authorities' reply to the GRETA questionnaire for the 4th evaluation round, pp. 13-14.

³³ In June 2024, a joint opinion on the draft law on national minorities was adopted by the Venice Commission at the request of the Armenian authorities. According to it, the draft law does not regulate all aspects of the legal status of persons belonging to national minorities, and it should promote measures to achieve full and effective equality between persons belonging to national minorities, among people belonging to different minorities and those belonging to the majority. Opinion available at : [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2024\)019-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2024)019-e).

³⁴ Advisory Committee on Framework Convention on the Rights of Minorities, fifth opinion on Armenia, 2022; European Commission against Racism and Intolerance (ECRI), fifth report on Armenia, 2023; UN Committee on the Elimination of Racial Discrimination, Concluding observations on Armenia, December 2024.

³⁵ It is estimated that 5% of girls in Armenia marry before the age of 18. See <https://www.girlsnotbrides.org/learning-resources/child-marriage-atlas/regions-and-countries/armenia/>; see also UNFPA, Child Marriage in Armenia (overview), 2014.

revision, GRETA notes that it is insufficient to address the risks of child marriages, which are often not officially registered. GRETA underlines that child marriage and forced marriage can be used as vehicles to facilitate trafficking and exploitation, including in prostitution, for the production of sexual abuse and exploitation materials, labour exploitation, exploitation in domestic work or exploitation in criminal activities.³⁶ Many interlocutors considered that the Armenian authorities are not doing enough to effectively address the problem of child marriage. There is a need to strengthen awareness raising among ethnic minorities, improve the training of professionals working with these groups and address the root causes. In their comments on the draft report, the Armenian authorities underlined that cases of forced marriage are given appropriate response by the criminal justice system, regardless of the ethnicity or origin of victims. Without questioning the authorities' response to identified cases of forced marriage, GRETA notes that greater efforts are needed to prevent such cases.

52. In addition to the general efforts to address school dropout mentioned in paragraph 46, specific measures have been taken to improve school attendance of children from ethnic minorities. Language courses of Yezidi, Kurdish and Assyrian are taught in schools, and textbooks have been published in minority languages. Nevertheless, these efforts are considered insufficient. GRETA notes that according to the last conclusions of the UN Committee on the Elimination of Racial Discrimination concerning Armenia (2024), there remain issues hampering access to education for Yezidis, including the distances between the schools and the communities, and the quality of school facilities, equipment and the available textbooks in minority languages.³⁷ In their comments on the draft report, Armenian authorities underlined that schools located in communities with high concentration of national minorities are not merged with other schools, taking into account their linguistic specificities. Further, efforts have been made to facilitate transportation to schools for children and educational staff by introducing a procedure for the reimbursement of transportation fees in 2025.

53. GRETA considers that the Armenian authorities should make additional efforts to prevent trafficking in human beings of members of disadvantaged minorities, including by:

- strengthening awareness raising of the risks of human trafficking amongst them;
- preventing child and forced marriages, notably through training of relevant professionals (including education staff, social workers, child protection officers, law enforcement officers, prosecutors and judges) and targeted awareness raising amongst disadvantaged minorities;
- improving the socio-economic inclusion of disadvantaged minorities, notably their access to education (see also the recommendation in paragraph Error! Reference source not found.);
- involving organisations representing disadvantaged minorities in the design and implementation of anti-trafficking policies and measures.

³⁶ See ICAT, *Addressing trafficking in persons through the lens of child marriage and forced marriages*, Issue Brief, 2025.
³⁷ Available at: <https://docs.un.org/en/cerd/c/arm/co/12-14>

iii. *Persons with disabilities*

54. Persons with disabilities³⁸ 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.³⁹ Reference can also be made to the 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.⁴⁰

55. There are around 190 000 registered persons with disabilities in Armenia (about 6.5% of the population), including 9 000 children.⁴¹ Persons with disabilities face significant challenges in their inclusion, particularly in terms of access to education, work and independent living, which leaves them vulnerable and exposed to abuse by traffickers.

56. In May 2021, Armenia adopted its first Law on the Rights of Persons with Disabilities, representing an important step forward by shifting from a medicalised to a social model of disability.⁴² It was also intended to implement Armenia's obligations under the UN Convention on the Rights of Persons with Disabilities, which the country ratified in 2010. The law includes guarantees of accessibility, independent living, access to justice, and reasonable accommodation for persons with disabilities, and bans disability-based discrimination. Further, in June 2023, the authorities adopted the Comprehensive Programme for the Social Inclusion of Persons with Disabilities (2023-2027) which includes priority measures in relation to accessibility, protection from discrimination, access to employment, education, health, cultural rights, and independent living, as well as protection in emergency.⁴³

57. GRETA was informed that several persons with disabilities and/or with mental health issues were identified among victims of human trafficking in Armenia.⁴⁴ One of the main factors which increases risks of persons with disabilities becoming victims of trafficking is related to their limited access to employment. Among recent cases is that of a man who had difficulty finding employment due to his deafness. He was eventually hired at a car park, but found himself working in exploitative conditions, without pay, alongside two other deaf people.⁴⁵ The rate of unemployment is reportedly very high among registered persons with disabilities. This is mainly due to the lack of accessibility/adaptation of workplaces, as well as stereotypes among employers. The abovementioned Programme for the Social Inclusion of Persons with Disabilities prioritises improving the capacity of the Health and Labour Inspection Body to protect the rights of workers with disabilities, as well as financial incentives for companies to encourage employment of persons with disabilities. However, GRETA was informed that the authorities had put an end to the targeted support programmes for companies to provide reasonable accommodation to persons with disabilities in workplaces, replacing them by general employment support programmes. In their comments

³⁸ 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.

³⁹ See OSCE, *Invisible Victims: The Nexus between Disabilities and Trafficking in Human Beings*, March 2022, p. 16.

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

⁴¹ Source: Statistical Committee (data for 2023).

⁴² The medicalised model of disability assumes that people are disabled by their impairments or differences, while the social model considers that people are disabled by barriers in society.

⁴³ Available (in Armenian) at: <https://www.arlis.am/hy/acts/178901>.

⁴⁴ There were three persons with mental health issues among identified victims in 2023 and one in 2024 (data as of September 2024). By way of comparison, all special category victims identified during the previous reporting period were children, not persons with mental health issues.

⁴⁵ Available (in Armenian) at: <https://medialab.am/290287/>.

on the draft report, the Armenian authorities underlined that persons with disabilities have the right to be included in state employment support programmes on a priority basis.

58. Children with disabilities face difficulties in accessing inclusive education, notably due to lack of accessibility of infrastructures, insufficient number of trained staff (teaching assistant), as well as negative attitudes from other pupils and their parents. According to the authorities, when inclusive education is not possible, home-based schooling can be provided, with a teacher regularly visiting the child. In practice, a significant number of children with disabilities are placed in special institutions (boarding schools), particularly in rural areas, or left out of school.

59. Efforts have been made to implement the deinstitutionalisation reform and ensure independent living of persons with disabilities. According to the authorities, 10 day-care centres have been set up across the country, supporting 445 persons with disabilities monthly, and 5 small-types homes providing round-the-clock support, supporting 70 persons. However, there remain a significant number of persons with disabilities in the 12 specialised institutions across the country, including children. Parents may prefer to have their child with a disability cared for in an institution, due to lack of necessary skills and support in the community, but also for economic reasons. According to the Human Rights Defender, mechanisms for detecting, preventing, and responding to violence against persons with disabilities are not implemented in institutions, and staff in psychiatric and social protection institutions working with persons with disabilities lack skills to work with these persons which can in itself lead to various forms of ill-treatment.⁴⁶ In their comments on the draft report, the Armenian authorities indicated that efforts are being made to improve the services provided to persons with disabilities and support their independent living. Since 2024, a personal assistance service has been set up for persons with disabilities, which currently benefits 215 persons. Further, a new independent living centre is being built.

60. In 2023, an investigation was opened against the director and three employees of a neuropsychological social care home in Vardenis regarding allegations of ill-treatment and exploitation of patients.⁴⁷ The patients were performing work in the institution as well as cleaning in the private home of the director. While work performed by patients in social care and psychiatric institutions, such as cleaning, is often considered as “occupational therapy”, GRETA was told by the Ombudsperson’s Office that staff of such institution are not sensitised to possible risks of forced labour in this framework. GRETA notes that few professionals working in institutions for persons with disabilities participated in training activities on THB during the reporting period.⁴⁸ However, it does not seem that the training activities addressed the specific issue of the risks of human trafficking in the framework of occupational therapy.

61. According to NGOs, there is a need to prioritise awareness raising of persons with disabilities, in particular persons with intellectual disabilities or visual impairment, with information on human trafficking in accessible format. There are no specific awareness raising activities targeting persons with disabilities in the NAP 2023-2025.

62. GRETA considers that the Armenian authorities should make additional efforts to prevent human trafficking of persons with disabilities, including by:

- conducting research into the vulnerabilities of persons with disabilities to trafficking in human beings;
- raising awareness among persons with disabilities of the risks of THB, in an accessible manner;

⁴⁶ See the Written Submission of the Human Rights Defender of Armenia to the UN Committee on the Rights of Persons with Disabilities, 2025.

⁴⁷ Source: <https://hetq.am/hy/article/153273> (in Armenian).

⁴⁸ See the Armenian authorities’ reply to GRETA’s questionnaire for the 4th evaluation round, p. 8.

- improving access to employment, education and independent living for persons with disabilities;
- implementing mechanisms for detecting, preventing and responding to violence, exploitation and abuse against persons with disabilities in institutions, ensuring that occupational therapy is not abused to exploit such persons, and providing adequate training to relevant staff in this regard.

iv. Migrant workers

63. Risks of human trafficking affects both Armenian nationals who emigrate for economic reasons and foreign nationals seeking employment in Armenia. While there have been reports over the years of Armenians identified as victims of trafficking for labour exploitation in Russia and other foreign countries, the Armenian authorities claim that this trend is declining. However, GRETA notes that official data on the number of victims do not necessarily reflect the reality notably due to the reluctance of workers to report their exploitation for fear of reprisals.

64. While there are no official statistics on migrant workers in Armenia, it is acknowledged that the majority are Russians, and their number has increased since Russia's full-scale invasion of Ukraine. Russian migrant workers are not considered particularly vulnerable, as the majority of them have a high level of education and work in the IT sector. On the other hand, there has been an increase in Indian nationals residing in Armenia (between 20 000 and 30 000) since the simplification of visa procedures in 2017. Many of them work in the informal economy, without work permits, on low skilled jobs in sectors such as construction, agriculture, delivery and services.⁴⁹

65. While labour migration generates challenges for the Armenian authorities, there is currently no National Migration Strategy in Armenia (see paragraph 83). In order to facilitate safe and legal labour migration, bilateral agreements have been signed by the Armenian authorities with Bulgaria, Qatar, United Arab Emirates and Iran.

66. In 2024, several Indian workers who had arrived in Armenia through recruitment agencies or intermediaries reported being victims of exploitation, such as lower wages than promised, no employment contract, very poor accommodation conditions and confiscation of their passports.⁵⁰ GRETA was informed that 13 Indian nationals were referred to the Victim Identification Commission (VIC) as possible victims of trafficking for the purpose of labour exploitation, but they did not obtain victim status as it was considered that their cases did not amount to human trafficking but concerned violations of labour laws (see paragraph 103).

67. In 2025, IOM conducted an assessment on labour migration and trafficking in Armenia which involved a survey among 521 migrant workers.⁵¹ Most respondents were men, aged between 20-39 years, and originated from Russia and India. Approximately 40% had no written contract and a similar proportion had no work permit. Many complained about their working conditions, expressing dissatisfaction with safety standards, and reporting long working hours and delays in being paid their wages.

⁴⁹ Source: [Eurasianet.org](https://eurasianet.org).

⁵⁰ See for example: <https://www.infomigrants.net/fr/post/55483/indian-workers-in-armenia-claim-abuse-from-job-agencies> ; <https://hetq.am/en/article/164493>.

⁵¹ More information at: <https://armenia.un.org/en/293128-iom-armenia-advances-efforts-combat-trafficking-new-assessment-labour-migration-and-human>.

68. To prevent trafficking and exploitation of Armenians emigrating to seek work abroad, the NAP for 2023-2025 envisages awareness raising of individuals registered with the Unified Social Service (USS) as well as those looking for jobs abroad. In co-operation with the NGO Caritas Armenia, the Ministry of Labour and Social Affairs organised information meetings for migrant workers in various localities with a view to offering pre-departure counselling and addressing the challenges faced upon return to Armenia. In their comments on the draft report, the Armenian authorities referred to numerous information seminars on trafficking and forced labour conducted in the community, organised in co-operation with other NGOs. Employees from the regional centres of the Unified Social Service (USS) were trained on providing pre-departure consultations. Some local offices of the State Employment Agency have set up Migration Resource Centres which can assist migrant workers in finding jobs abroad. Further, information for migrant workers is available in a multilingual online platform (MigApp), developed in co-operation with the IOM and adapted to the needs of migrants arriving in Armenia.⁵²

69. The authorities also implemented an assistance programme for the reintegration of returnees, who are provided with information and referred to relevant social services based on a needs assessment performed by local offices of the USS. Further, a rent subsidy of AMD 60,000 (about EUR 130) is provided for 6 months to Armenians who were subject to forced return from abroad. Support to find employment upon return is available in local offices of the State Employment Agency and Migration Resource Centres.⁵³

70. In the framework of the above-mentioned IOM assessment on labour migration and trafficking, out of the 521 surveyed migrant workers, 21.5% relied on intermediaries or agents to facilitate their arrival in Armenia, and 15.8% of those who used intermediaries reported experiencing problems. Although recommended in the previous GRETA report,⁵⁴ there is still no regulation and/or licensing of recruitment agencies and intermediaries. Further, there is no prohibition of fees imposed on migrant workers. In practice, fees are often applied, creating debt bondage and making migrant workers highly vulnerable to exploitation. According to the authorities, the recruitment agencies and intermediaries is usually operating from abroad and their low number in Armenia does not justify the adoption of specific regulations.

71. The mandate of the Health and Labour Inspection Body (HLIB) remains as described in the previous GRETA report.⁵⁵ Pursuant to the Law on Organising and Carrying Out Inspections in the Organisations in Armenia, which covers all public inspection bodies, labour inspectors do not have the power to conduct unannounced inspections and have to notify their visit at least three days in advance. Further, labour inspections can only take place in registered businesses and cannot be conducted in the absence of the business manager. Labour inspections are carried out on the basis of a predefined checklist that must be followed, except in very limited circumstances.⁵⁶ As a result, the legislation and practices on labour inspection in Armenia are not in line with ILO Convention on Labour Inspection, ratified by Armenia in 2004.⁵⁷

⁵² <https://georgia.iom.int/news/iom-customizes-migapp-respond-needs-migrants-traveling-georgia-and-armenia>.

⁵³ See Asatryan N., *Guide for Reintegration of Returnees in Armenia*, Migration Service and IOM Armenia, 2020.

⁵⁴ See GRETA's 3rd report on Armenia, paragraph 159.

⁵⁵ See GRETA's 3rd report on Armenia, paragraphs 151-153.

⁵⁶ See also Dr Smusz-Kulesca M., *Reports on the needs assessment in respect of social rights in Armenia*, Council of Europe, 2024, p. 20-21.

⁵⁷ Committee of Experts on the Application of Conventions and Recommendations (CEACR), Observations on the application of Convention No. 81 by Armenia, International Labour Conference, 112th Session, 2024.

72. Out of 94 staff positions in the HLIB, 50 were filled at the time of GRETA's visit. This significant lack of human resources hinders the conduct of labour inspections. Even though foreign workers can submit confidential complaints to the HLIB,⁵⁸ this became impossible after the dedicated platform was hacked. Due to fear of being reported to the immigration authorities and language barriers, migrant workers rarely submit complaints to the HLIB. No information was provided on plans or measures taken to reintroduce confidential complaints to the HLIB.

73. In 2022, a definition of compulsory or forced labour was introduced in Article 3.2, paragraph 2, of the Labour Code in 2022, defining it as "any work or service which is exacted from or performed by a person under the threat of coercion of any kind and for which that person has not voluntarily expressed his or her consent".⁵⁹ Indicators and guidelines on forced labour have been disseminated in order to help professionals, in particular labour inspectors, identify such cases. According to the authorities, these tools have been integrated into the specialised training courses for labour inspectors and social workers.

74. GRETA was informed that a joint platform was established between the HLIB, the migration authorities and the tax authorities in order to share information, including on possible cases of labour exploitation and trafficking of migrant workers.

75. More recently, with the support of IOM, early warning indicators were developed with a view to detecting possible cases of forced labour and human trafficking as part of the work permit system. However, the upgrade of the system with the insertion of the indicators is pending the recruitment of an IT company. The Armenian authorities are also considering introducing a work visa, in which the early warning tool could be included.

76. GRETA notes that the limited mandate of the labour inspectorate, as well as its insufficient human resources and limited capacities, do not allow them to play an effective role in the prevention and fight against trafficking for the purpose of labour exploitation, as well as in the identification of possible victims. To date, no victims of trafficking have ever been detected by labour inspectors (see also paragraph 107).

77. Referring to its Guidance Note on combating trafficking for labour exploitation⁶⁰ 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,⁶¹ GRETA once again urges the Armenian authorities to:

- extend the mandate of the Health and Labour Inspection Body and provide it with adequate human, material and financial resources to enable it to conduct proactive and unannounced inspections in all workplaces, including unregistered companies and informal workplaces;
- prohibit recruitment fees and related costs borne by workers or jobseekers;
- regulate and monitor recruitment and temporary work agencies to strengthen prevention of THB and labour exploitation. This should include the introduction of a legally binding certification of recruitment agencies which act as intermediaries for migrant workers arriving in Armenia and ensuring that such workers are provided with employment terms, contracts and payslips in a language they understand;

⁵⁸ The platform to submit anonymous complaints was called: [EmployeeProtect.am](https://employeeprotect.am).

⁵⁹ Unofficial translation.

⁶⁰ <https://rm.coe.int/guidance-note-on-preventing-and-combating-trafficking-in-human-beings-/1680a1060c>.

⁶¹ <https://rm.coe.int/booklet-preventing-and-combating-trafficking-in-human-beings-for-the-p/1680aa08ef>.

- ensure that migrant workers have access to safe reporting mechanisms and effective anonymous complaint mechanisms so that victims of abuse or exploitation can submit their case without fear of reprisals.

78. Further, GRETA considers that the Armenian authorities should take additional measures to address the vulnerabilities of migrant workers, including by:

- providing further training on trafficking in human beings to relevant professionals, notably labour inspectors and staff of the Unified Social Services, with a focus on vulnerabilities that lead to THB and on early detection of cases of THB for the purpose of labour exploitation;
- strengthening the provision of information to migrant workers about labour standards, risks of human trafficking, and the rights of victims of trafficking;
- developing co-operation with the main countries of origin/destination of migrant workers with a view to preventing trafficking for labour exploitation;
- building strategic partnerships with civil society, trade unions and the private sector on the prevention of trafficking for the purpose of labour exploitation.

v. Asylum seekers and refugees

79. In recent years, the number of people seeking international protection in Armenia has increased significantly. As mentioned in paragraph 14, following the military operation of Azerbaijan in Karabakh in 2023, more than 115 000 persons fled to Armenia, many of whom have remained in the country. As of December 2024, there were 982 asylum seekers and 4 270 refugees in Armenia. Ukraine has been the main country of origin, followed by Iraq, Iran and Egypt. There were also 373 stateless persons and 4 124 persons in refugee-like situations, mainly ethnic Armenians from Syria.⁶²

80. Pursuant to the Law on Refugees and Asylum, special attention should be paid to asylum seekers and refugees “with specific needs”. This includes children, persons with disabilities, elderly, pregnant women, single parents with minor children, survivors of trafficking, people suffering from grave diseases, persons with mental disorder and survivors of torture, rape and other kinds of violence.⁶³ According to the authorities, officials of the Migration and Citizenship Service (MCS) try to detect individuals with specific needs at all stages of the asylum procedure. If the asylum interview reveals indicators of vulnerability and/or human trafficking, a specialist trained to deal with persons with specific needs (psychologist or social worker) will be involved, and the appropriate referrals will be made.⁶⁴ However, there is no standardised procedure or tools to help professionals identify vulnerable individuals among asylum seekers and refugees.

81. Efforts have been made to provide guidelines and training to officers of the MCS on detecting victims of human trafficking and exploitation (see paragraph 105). Nevertheless, according to civil society representatives met by GRETA, there is a need to ensure effective procedures for systematic identification of vulnerable individuals during the asylum procedure, as well as to establish mechanisms for their referral to assistance. Further, there are difficulties in securing interpreters during the asylum procedure, which may prevent the detection of vulnerable individuals. During the visit, GRETA was informed that the budget for interpretation services had been increased by AMD 7 million (around EUR 15,900), which represents a 40% increase. However, this budget remains insufficient and does not make it possible to have

⁶² Source: UNHCR. By way of comparison, in 2021, 260 persons applied for asylum in Armenia, and 78 persons obtained refugee status. In 2022, following the war in Ukraine, the number of asylum seekers increased to 968 and 358 persons were recognised as refugees.

⁶³ See Article 8, paragraph 1, of the Law on Refugees and Asylum.

⁶⁴ See the Armenian authorities' reply to GRETA's questionnaire for the 4th evaluation round, p. 19.

interpreters at all border points and in penitentiary institutions where asylum applicants can be detained. As a result, the authorities must rely on interpreters provided by UNHCR or NGOs, but they cannot effectively cover all interpretation needs.

82. Pursuant to the Law on Refugees and Asylum, asylum seekers and refugees have the right to free legal assistance, employment, education and free medical care. Further, refugees can receive social benefits. However, access to housing is particularly challenging for asylum seekers. They can stay in the Temporary Accommodation Centre for Asylum-seekers in Yerevan, which can only accommodate 42 persons. It is overcrowded, the accommodation conditions are very poor, and there are no separate sections for men, women, families and unaccompanied children. If they are not accommodated at the centre, asylum seekers can receive financial support for alternative accommodation, but its amount is insufficient to cover the rent. To address these challenges, the Armenian authorities are building a second reception centre near Yerevan which will have a capacity to accommodate 120 persons, in separate buildings for men and women/families. In general terms, there is a need to diversify reception options for asylum seekers and refugees, including community-based housing, and ensure long term access to accommodation.

83. The increasing number of asylum seekers has generated pressure on the limited public services available. Several years ago, the authorities started preparing a national strategy for the integration of asylum seekers and refugees, which was put on hold following the military operation of Azerbaijan in Karabakh. The authorities have decided to adopt a National Migration Strategy which will cover integration. In their comments on the draft report, the Armenian authorities stated that the draft Migration, Asylum and Citizenship Strategy for 2026-2031 has been prepared and will soon be circulated.

84. With regards to refugees from Karabakh, the temporary protection mechanism activated in October 2023 allows them to reside, work, and access social welfare, health care and education in Armenia. Initially granted for a period of one-year, temporary protection has been extended on several occasions and currently runs until 31 December 2026. Persons from Karabakh can obtain Armenian citizenship, and according to the Armenian authorities, in the period from the beginning of 2023 and the end of October 2025, 21 255 persons under temporary protection obtained it. Specific assistance programmes have been set up by the Armenian authorities. These include a housing programme which allows refugees from Karabakh to receive financial support ranging from AMD 8 to 16 million (between EUR 17 800 to 35 600), for the purchase of accommodation or the repayment of existing mortgage loans.⁶⁵ In addition, a cash programme was established including a one-time allocation of AMD 100 000 per person (about EUR 220) and a monthly allocation of AMD 50 000 per person (about EUR 110) for persons without housing. It is estimated that the cash assistance programme benefited most of the refugees from Karabakh. However, at the end of 2024, the authorities decided to decrease the amount of the monthly allocation (currently AMD 30 000, or EUR 66) and restrict the list of beneficiaries to persons with the most pressing needs (such as persons with disabilities, elderly, pregnant women). Further, since June 2025, urgent social assistance has been available for families of refugees from Karabakh in need, in the form of additional monthly cash assistance. The authorities indicated that 44 414 persons from Karabakh have received assistance from the cash programme, 6 168 persons in need have received additional cash assistance, and 4 265 families benefited from the housing programme.⁶⁶ GRETA welcomes the efforts made by the Armenian authorities to provide support to, and improve the inclusion of, refugees from Karabakh in Armenia and invites them to continue their efforts.

⁶⁵ Dr Smusz-Kulesca M., *Reports on the needs assessment in respect of social rights in Armenia*, Council of Europe, 2024, p. 47.

⁶⁶ Data on the cash programme and the additional urgent assistance is as of December 2025, and data on the housing programme is as of January 2026.

85. Access to work is also an issue of concern. Decent work opportunities are rare in a country which is affected by a high level of unemployment,⁶⁷ and the language barrier creates additional obstacles for those who do not speak Armenian.⁶⁸ As a result of these challenges, most asylum seekers and refugees are employed in low-qualified jobs and/or seasonal work, and may be inclined to accept almost any conditions imposed by their employers including in the informal market. According to a survey report published by IOM in 2024, the unemployment rate among refugees from Karabakh is much higher than the general population (49%), and it is even higher for women refugees. Only 25% of the surveyed refugees who were employed had a written contract. The shortage of vacancies is reported as one of the main reasons (37%) for not finding employment.⁶⁹ In their comments on the draft report, the Armenian authorities emphasised that refugees are given priority in public employment programmes. In addition, efforts have been made to improve access to employment for refugees from Karabakh through territorial centres for unified social services (USS) and specific programmes offering short-term training and support for self-employment.

86. The number of unaccompanied or separated children in Armenia is low. According to data provided by the Armenian authorities during the visit, there were six in 2022, four in 2023 and one in 2024. These figures do not include 30 unaccompanied children from Karabakh who were mostly reunited with their biological or extended families. The Armenian authorities prioritise the accommodation of unaccompanied or separated children in the temporary reception centre for asylum seekers in Yerevan, although it is not adapted for such children (see paragraph 82). Childcare institutions or foster families are not an option due to language barrier. As already mentioned in paragraph 43, there are concerns regarding the appointment of legal guardians due to the lack of capacities of the Guardianship and Trusteeship Commission, and it is difficult to find legal guardians equipped to assist foreign children.⁷⁰

87. Few awareness-raising activities have been implemented among asylum seekers and refugees to sensitise them on the risks of human trafficking. The authorities' reply to GRETA's questionnaire only refers to information seminars, in co-operation with the NGO UMCOR, which targeted refugees from Karabakh and currently leaving the Armenian region of Armavir.⁷¹ GRETA underlines that providing information to people seeking international protection at the earliest possible stage about their rights, support services and work opportunities and raising awareness among them about the risks of exploitation in different economic sectors, including sexual exploitation, is crucial, especially given that misinformation is being spread widely.⁷²

88. GRETA considers that the Armenian authorities should take additional measures to address the vulnerabilities to trafficking in human beings of persons seeking international protection in Armenia, including by:

- putting in place procedures for the vulnerability assessment of asylum seekers and refugees and ensuring their effective implementation;
- improving access to translation and interpretation during the asylum procedure;
- further developing the training of relevant professionals, notably officers of the Migration and Citizenship Service, on detecting vulnerabilities to human trafficking;
- raising awareness of asylum seekers and refugees of the risks of human trafficking and the rights of victims of THB;

⁶⁷ 13.3% of unemployment in Armenia. Source: ILO estimates for 2024.

⁶⁸ Refugees from Karabakh speak a dialect distinct from standard Armenian.

⁶⁹ IOM, c, October 2024.

⁷⁰ See also Urumova I., *Needs assessment report on Armenia's deinstitutionalisation and child protection reform including the protection of the rights of unaccompanied and separated children*.

⁷¹ See the Armenian authorities' reply to GRETA's questionnaire for the 4th evaluation round, p. 9.

⁷² See GRETA's Guidance Note on addressing the risks of trafficking in human beings related to the war in Ukraine and the ensuing humanitarian crisis, GRETA(2022)09, 4 May 2022.

- improving the social and economic integration of asylum seekers and refugees, notably their access to employment and housing;
- strengthening the rules on the appointment of legal guardians for unaccompanied or separated children, and providing these children with safe accommodation, as well as professionals and services capable of assisting them.

vi. Persons engaged in prostitution

89. While there is no research on prostitution in Armenia, persons in situation of prostitution are considered very marginalised. There are reports of violence and threats against them, including against transgender sex workers,⁷³ but they rarely report their case for fear of sanctions and lack of trust in the authorities.⁷⁴

90. Pursuant to Article 519 of the Code of Administrative Offences, prostitution is an administrative offence sanctioned by a fine of up to AMD 70 000 (approximately EUR 156), which is almost equivalent to the country's minimum wage, and up to AMD 100 000 (approximately EUR 223) in case of repeat offence. In theory, victims of trafficking can be exempted from liability for engaging in prostitution if they were compelled to do so (see paragraph 153). There is no data on the number of persons who have been sanctioned for this offence, nor on the number of victims of trafficking exempted from it.

91. GRETA underlines that sanctioning the act of prostitution significantly increases the vulnerability of persons engaged in prostitution to human trafficking by pushing the sex trade underground. This legal approach increases their dependence on exploitative intermediaries and discourages them from seeking help from the authorities due to fear of sanctions. As a result, access to essential support services diminishes and traffickers can operate with greater impunity. Further, GRETA notes that in order to reduce sexual exploitation, it is important to implement exit programmes for persons who wish to leave prostitution.

92. Most of the support provided to persons in situation of prostitution comes from civil society actors, such as the NGO Right Side. In 2025, the NGO organised a training activity for persons engaged in prostitution on their legal rights, strategies for interacting with the police, personal safety strategies, and self-advocacy tools.⁷⁵

93. GRETA takes note of the 2022 concluding observations of the UN Committee on the elimination of discrimination against women (CEDAW) concerning Armenia, which recommended to the authorities to collect information and data on women in prostitution, address the root causes of the exploitation of women and girls in prostitution, introduce measures to tackle the demand side, and provide exit programmes and alternative income-generating opportunities for women who wish to leave prostitution.⁷⁶

94. GRETA considers that the Armenian authorities should take additional measures to reduce the vulnerabilities to human trafficking of persons engaged in prostitution, including by abrogating the administrative offence of engaging in prostitution and developing exit programmes for persons wishing to leave prostitution.

vii. LGBTI persons

⁷³ See the 2024 Annual Report of the NGO Pink Armenia; 2024 legal report of the NGO Right Side.

⁷⁴ [Armenian Sex-Workers: Life in a Survival Mode - Glimpse from the Globe](#)

⁷⁵ More information at: <https://rightsidengo.com/en/news-details/iravakan-gragitvouthyvoun-ev-inqnapashtpanvouthyvoun-dasyntac-seqs-ashkhatvoghneri-hamar>

⁷⁶ CEDAW, Concluding observations on the seventh periodic report of Armenia, 1 November 2022, paragraph 28.

95. 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, there is a significant proportion of LGBTI people among homeless people, and LGBTI people can be victims of discrimination by the authorities and services, making them less likely to file a complaint or ask for help.⁷⁷

96. According to NGOs, LGBTI persons in Armenia are vulnerable to sexual and labour exploitation due to their marginalisation and discrimination. Violations of the rights of LGBTI persons are documented in several reports which provide evidence of violence and discrimination in accessing education and employment.⁷⁸ Following a 2022 judgment of the European Court of Human Rights in which the Court found that the Armenian authorities had failed to offer protection from homophobic acts and hate speech and to conduct a proper investigation into these incidents,⁷⁹ the government presented a draft Law on Equality and Non-discrimination in 2024. However, it appears that the draft does not specifically include sexual orientation and gender identity among the discrimination grounds, but, according to the authorities, they are covered by the broader ground of “other personal or social circumstances”. The authorities have also provided training to law enforcement officers on hate crimes and hate speech against LGBTI persons.

97. NGOs supporting LGBTI persons and trans persons providing sexual services have detected several possible cases of human trafficking, both for sexual and labour exploitation, but the victims did not want to report to the authorities due to lack of trust. There has reportedly been an increase in LGBTI persons among asylum seekers and refugees, notably from Russia, Iran, Georgia and Cuba. Some arrive through smuggling networks and are exploited in prostitution to reimburse their debts, others fall victims of exploitation because of insufficient support from the authorities. LGBTI asylum seekers and refugees are not included in the list of individuals with specific needs under the Law on Refugees and Asylum (see paragraph 80). Access to housing is challenging, particularly for transgender persons as they cannot be accommodated in the Temporary Centre for Asylum Seekers and the amount of rent subsidy provided by the State is not enough to cover housing needs (see paragraph 0). Further, finding a job is challenging for transgender refugees who suffer discrimination in accessing employment.

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

⁷⁷ See: ILGA, *Intersections: The LGBTI II Survey – Homelessness Analysis*, 2023; <https://lac.iom.int/en/blogs/lgbtqi-victims-human-trafficking> ; <https://2017-2021.state.gov/wp-content/uploads/2019/02/272968.pdf>.

⁷⁸ See the annual reports of the Human Rights Defender of Armenia, the NGO Pink Armenia and the NGO Right Side.

⁷⁹ *Oganezova v. Armenia* (Application No. [71367/12](#)).

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. The procedure for the identification of victims of trafficking in human beings is provided for in the 2015 Anti-Trafficking Law.⁸⁰ It consists of two phases: (1) pre-identification, which is done by the Ministry of Labour and Social Affairs (including its units in the regions), the Police (including their regional representations) and NGOs which have concluded a memorandum with the Anti-Trafficking Council; (2) formal identification which is carried out by the Victim Identification Commission (VIC), comprising three representatives of the authorities (Ministry of Labour and Social Affairs, General Prosecutor's Office and the Police), as well as three representatives of NGOs (Hope and Help, Democracy Today and Association of Audiovisual Reporters). Although a revision of the composition of the VIC was included in the NAP 2023-2025, it was finally considered unnecessary.

101. With a view to improving the formal identification of victims of human trafficking, indicators for the VIC were adopted in 2022.⁸¹ The indicators are detailed and relate to the nature of trafficking-related acts, the means used and the forms of exploitation. The identification of a person as victim of trafficking must be based on at least one indicator from each relevant category (action, means and exploitation). Both governmental and non-governmental interlocutors considered that these indicators are a very positive step as they facilitate and systematise the identification of victims of trafficking by members of the VIC. Although the list of indicators is extensive, GRETA notes that its exhaustive and mandatory nature may result in a high threshold of proof (see also paragraph 103).

102. In 2022, six persons were formally identified by the VIC and two were denied victim status. In 2023, 25 were formally identified and 20 were denied victim status. In 2024, 25 were formally identified and 18 were denied victim status. In 2025, 34 persons were formally identified as victims of THB and 14 were denied victim status. The forms of exploitation of the identified victims were sexual exploitation, labour exploitation and exploitation in begging. There have been no victims of other forms of exploitation identified, such as criminal exploitation and forced marriage. According to NGOs met by GRETA, the number of victims of human trafficking identified each year does not reflect the real extent of the phenomenon because there is heavy reliance on victims to report their case to the authorities, and little efforts to proactively detect cases.

⁸⁰ See GRETA's 2nd report on Armenia, paragraphs 93-95; GRETA's 3rd report on Armenia, paragraphs 170-171.

⁸¹ Decision of the Government of the Republic of Armenia No 1534-N of 6 October 2022 "On approving the indicators for identifying a person as a victim or a victim of a special category by the Commission for Identification of Victims Subjected to Trafficking in and Exploitation of Human Beings".

103. The authorities indicated that victim status is mostly denied when it did not amount to human trafficking based on the new indicators. According to NGOs, this happened because it was found that the victims were not deprived of their passports. GRETA is concerned that the VIC applies a high evidentiary threshold. GRETA notes that victims of trafficking can be exploited through subtle forms of controls, rather than coercion, violence or deprivation of liberty or personal documents. More attention should be put at indicators related to the abuse of a position of vulnerability of the victim, including a situation of dependence towards the employer due to irregular status or for the provision of accommodation.

104. As mentioned in paragraph 17, in 2024, the government decision on the procedure for selecting NGO partners in the identification process was amended.⁸² The aim was to improve transparency and efficiency in the selection procedure and expand the number of NGOs that can refer victims to the VIC, which were few in number and concentrated in Yerevan. The revised decision established new criteria that allow NGOs working in the field of violence against women, domestic violence and human rights to become partners. Following a public call for applications launched in the first quarter of 2025, seven new NGOs were selected, including four regional NGOs. GRETA welcomes the expansion of the number of NGOs that can refer possible victims for identification.

105. Tools and training courses have been developed to improve the detection of victims of human trafficking by various categories of professionals. In 2022, as part of the 'Together Against Trafficking in Armenia' project, the NGO World Vision developed guidelines for social workers and staff of the Migration and Citizenship Service (MCS), which were distributed to relevant professionals by the Armenian authorities. Specific training courses were also organised for these professionals. In addition, indicators relating to compulsory and forced labour, developed at the end of 2021 for labour inspectors, have been incorporated into specialised training modules. While welcoming these efforts, GRETA has been informed by numerous interlocutors that training efforts are ad hoc and generally lost due to high staff turnover.

106. An assessment of the NRM was conducted in 2025 in the framework of an IOM project with a view to identifying gaps and measures to overcome them. According to the assessment report, while the normative foundation of the anti-trafficking system is strong, there are gaps between law and practice, particularly at the early stages of identification (e.g., detection). The report underlines that pre-identification is hampered by the lack of unified guidelines, resource disparities across regions and absence of standardized assessment tools, and the formal identification suffers from delays, occasional application of evidentiary thresholds resembling criminal proceedings, and insufficient procedural transparency.⁸³ The report was presented to the Armenian authorities and was followed by a simulation training gathering 34 representatives of state departments, territorial bodies, unified social services and NGOs. The authorities indicated that the recommendations of the assessment report, including a possible revision of the NRM, are included in the draft 8th NAP for 2026-2028.

107. While the number of victims of labour exploitation has increased compared to the previous reporting period, the cases were mostly detected by the Police. The Health and Labour Inspection Body (HLIB) does not have the power to pre-identify victims, but it can refer possible cases of human trafficking to relevant authorities (Ministry of Labour and Social Affairs or Police) to initiate the identification procedure. According to information provided during the visit, to date, no victims of trafficking have ever been referred to the VIC by labour inspectors.

⁸² Decision of the Government No. 851-N "On establishing the procedure for selection of partner non-governmental organisations, the procedure for selection of representatives of non-governmental organisations in the Commission for the Identification of Victims Subjected to Trafficking in and Exploitation of Human Beings".

⁸³ Ghazinyan S., *Assessment of the National Referral Mechanism for Victims of Trafficking and Exploitation – Armenia*, IOM, 2025.

108. Several persons with disabilities and/or mental health issues were granted the status of victims of human trafficking by the VIC. While detailed statistics on these victims are not available, reference was made to cases of persons with mental health disorders who had been trafficked for the purpose of exploitation in labour or begging. There is a lack mechanisms for detecting, preventing, and responding to violence against persons with disabilities in institutions (see paragraph 59), including human trafficking.

109. During the reporting period, 13 foreign nationals were officially identified as a victim of human trafficking by the VIC. For the other foreign nationals referred to the NRM, either their cases were not considered to be human trafficking, or they returned very quickly to their country of origin before their cases could be examined by the VIC.

110. GRETA was informed that only one potential victim of trafficking was detected among asylum seekers. During the interview with an officer of the MCS, the person reported having been sexually exploited in Türkiye before arriving in Armenia, but refused to be referred to the NRM. She has since been granted asylum in Armenia.

111. There is no immigration detention centre in Armenia. Irregular migrants are detained in prisons together with an increasing number of asylum seekers who are charged for immigration related offences. According to the authorities, in 2025, 473 penitentiary officers were trained on preventing human trafficking. GRETA was informed that often no investigation is carried out to determine whether detained irregular migrants are potential victims of smuggling and/or trafficking.

112. While welcoming the efforts made by the Armenian authorities to improve the identification of victims of trafficking, through the provision of indicators, guidelines and training to different categories of professionals, and the plans to expand NGO participation in victim identification, GRETA is concerned that insufficient efforts are made at proactively detecting victims of trafficking and that there remain gaps in the identification of foreign victims. The assessment of the NRM conducted in 2025 provides an opportunity to improve the identification of victims in Armenia.

113. GRETA urges the Armenian authorities to take further steps to improve the identification of victims of trafficking in human beings, including by:

- reinforcing the role of labour inspectors and staff of the Unified Social Services in the detection of victims;
- improving the identification of victims among migrant workers, asylum seekers, refugees and migrants in irregular situation, including in the reception centre for asylum seekers and in prisons;
- establishing mechanisms for the early detection of victims of THB, such as mobile units in co-operation with civil society organisations.

114. Further, GRETA considers that the Armenian authorities should:

- review the threshold of proof applied by the Victim Identification Commission when identifying victims of human trafficking to ensure that it does not resemble that of criminal proceedings;
- ensure that regular training on identifying victims of THB is provided to relevant professionals, including police officers, asylum officials, labour inspectors, child protection officers, educational staff, social workers, prison staff, professionals working in institutions for persons with disabilities and health-care professionals.

b. Assistance to victims

115. In its 3rd report on Armenia, GRETA urged the authorities to take additional steps to ensure that all assistance measures are guaranteed in practice, in particular by providing shelter and access to assistance to all victims of trafficking, including male victims, ensuring that adequate financing is provided for assistance services delivered by NGOs, strengthening effective access to the labour and providing long-term assistance to enable the social reintegration of victims.⁸⁴

116. The range of assistance measures available for presumed and formally identified victims of THB remains as described in previous GRETA reports.⁸⁵ During pre-identification stage, support to presumed victims is limited to “urgent measures” that are necessary for humanitarian reasons (emergency medical aid, temporary accommodation, general education, in-kind assistance of first necessity, psychological aid, provision of information). Following formal identification, victims are entitled to a broader range of measures including (non-urgent) medical and psychological assistance, in-kind assistance, accommodation, legal aid, consultative aid, provision of translation services, access to employment and education and lump sum monetary compensation.

117. Victim assistance is provided by NGOs selected by the Ministry of Labour and Social Affairs, on the basis of an annual call for tenders. For many years, the contract was awarded to the NGO Democracy Today. In 2024 and 2025, it was awarded to the NGO Sexual Violence Crisis Centre. GRETA was informed that the change in service provider had caused difficulties, as beneficiaries had to move fairly quickly from one shelter to another. Until 2025, the call for tender was announced annually, creating an administrative burden and preventing NGOs from employing staff under long-term contracts. However, in January 2026, the contract with the NGO Sexual Violence Crisis Centre was reviewed for 3 years.

118. In 2022, the annual funding provided by the State for victim support was AMD 40.2 million (about EUR 89 700), which were not fully spent,⁸⁶ and it decreased for the following years: in 2023, AMD 37.7 million (about EUR 84 000), in 2024, AMD 32.1 million (about EUR 71 600) and in 2025, AMD 33.8 million (about EUR 76 000). GRETA notes that the number of victims has been increasing (see Appendix I) and is concerned by the decrease in state funding for victim support.

119. Following formal identification, a social worker develops a re-integration and rehabilitation plan in consultation with the victim. Support to formally identified victims is provided as long as needed, but access to the shelter is usually limited to one year with a possibility of extension. In 2022, the Armenian government adopted a decision defining minimum quality standards for the provision of services to victims of human trafficking.⁸⁷ Several interlocutors viewed this decision as positive. However, they underlined that to ensure the implementation of the quality standards in practice, professionals supporting victims should be further trained, in particular medical staff. GRETA was informed of a case in which a medical institution shared the medical record of the victim with the trafficker who was the victim's husband.

120. GRETA visited the shelter for victims of THB in Yerevan, which is located at a secret address. It can accommodate 14 people, men and women, with bedrooms located on different floors. In 2024, 40 victims were accommodated in the shelter, including 13 Indian men and a large group of victims from Tajikistan who were offered the recovery and reflection period but, at their request, were returned to their country of origin only after a few days. During the first four months of 2025, 16 victims were placed in the shelter. Psychological assistance and other forms of support are provided by NGO staff outside the shelter. When denied formal identification, victims are referred to social services or to their embassy to arrange the return to their country of origin.

⁸⁴ See GRETA's 3rd report on Armenia, paragraph 182.

⁸⁵ See GRETA's 2nd report on Armenia, paragraph 104; GRETA's 3rd report on Armenia, paragraph 177.

⁸⁶ See report on the monitoring and evaluation of the anti-trafficking programmes, 2023.

⁸⁷ Decision of the Government No. 1538-N of 6 October 2022 "On providing accommodation, in-kind, psychological, counselling, legal aid and care to victims and special category victims of trafficking in and exploitation of human beings, including defining the minimum quality standards in relevant institutions".

121. While the number of presumed foreign victims has increased, they face challenges in accessing effective support due to language barriers and limited capacities of public officials to work with foreigners. In their comments on the draft report, the Armenian authorities underlined that victims are entitled to interpretation services. However, in practice, regular access to such services is limited, as also underlined by the external assessment of the NRM.

122. An evaluation of the support programme was conducted by the National Institute of Labour and Social Research in 2023. According to the monitoring report, most victims benefit from psychological aid, legal aid and support outside the shelter. For instance, in 2023, 32 victims were supported outside the shelter, which was four times more than the number of victims in the shelter.

123. With a view to facilitating victims' reintegration, the Armenian authorities intend to introduce 'rent certificates' which enable recipients to obtain public housing or subsidised accommodation. GRETA understands that these certificates have been introduced in law but need to be operationalised in a dedicated regulation which has not been adopted yet. Victims continue to face significant challenges once leaving the assistance programme because of limited access to the labour market. According to the report of evaluation of the support programme, no victim was supported in accessing work in 2022, and only two in the first half of 2023.

124. There is no specialised shelter for child victims of trafficking, who can be accommodated in the shelter attached to the Barnahus Centre in Yerevan. Four child victims were accommodated at the shelter in 2023 and five in 2024. Child victims can also be accommodated in childcare institutions or crisis centres. In their comments on the draft report, the authorities underlined that staff in childcare institutions undergo regular training to ensure that the support provided is tailored to the needs of victims of THB.

125. As noted in paragraph 57, GRETA was informed that several persons with disabilities and mental health issues were among the identified victims of human trafficking. According to the Anti-Trafficking Law, as 'special category victims', they shall be provided with care, if necessary, in a relevant institution. Such victims face more challenges in their reintegration. There is a lack appropriate and long-term housing solutions adapted to their status and comprehensive psychosocial rehabilitation programmes.⁸⁸

126. GRETA considers that the Armenian authorities should make efforts to improve assistance to victims of THB, in particular by:

- providing adequate and sustainable state funding for victim support delegated to NGOs;
- strengthening support to victims of human trafficking in accessing the labour market and housing;
- ensuring that presumed and formally identified foreign victims have access to adequate assistance, including access to interpreters when needed;
- improving specialised care and psychological support for victims of trafficking who have disabilities or mental health issues;
- providing training to staff supporting victims of trafficking, including staff of medical institutions.

⁸⁸ See also Ghazinyan S., *Assessment of the National Referral Mechanism for Victims of Trafficking and Exploitation – Armenia*, IOM, 2025, p. 42.

3. Substantive criminal law and procedural law

127. 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

128. 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.⁸⁹ 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.”⁹⁰

129. Since the entry into force of the new CC in Armenia on 1 July 2022, Article 188 of the CC criminalises trafficking in human beings, and Article 189 criminalises trafficking in children or helpless persons. Article 188 of the CC includes “using the personal dependence or the situation of vulnerability of the victim” amongst the means for committing the offence. A situation of vulnerability is defined as a “situation in which a person has no alternative acceptable for him or her than to submit to the abuse against himself or herself” (Article 3, paragraph 4, of the CC). According to the authorities, the CC covers any form of vulnerability (physical, mental, psychological, emotional, family, social or economic). In practice, the vulnerabilities which are mostly abused by traffickers are lack of housing and/or employment, isolation or lack of family, lack of knowledge about their rights and debts.

130. In addition, Article 189 of the CC criminalises trafficking of ‘persons in helpless situation’ which is punishable by imprisonment of seven to 10 years, instead of five to eight in case of Article 188. A person in a helpless situation is defined as “a person who due to his(her) physical or mental condition is not capable to show resistance or control his(her) actions or realise the nature of actions performed against him(her), as well as the person under twelve years-old” (Article 3, paragraph 1, of the CC). The notion of helpless situation is different from a vulnerability as it relates to a more permanent or global alteration. In practice, helpless situation often involves situation of disability and mental health disorders.

131. GRETA was informed of several judgments in human trafficking cases in which the situation of vulnerability of the victim was taken into account to prosecute or punish offenders. For instance, in a case of 2025, the defendant was accused of having recruited a married couple in situation of homelessness for the purpose of exploited them on a farm. He was charged under Article 189 of the CC in respect of one of the victims who was in a helpless situation due to her mental state. The case is pending.⁹¹ In another case, the defendant was accused of abusing the vulnerability of a victim who had mild intellectual disability and behaviour and psychotic disorders in order to exploit the victim in begging in Yerevan. He was convicted in 2024 to seven years of imprisonment for human trafficking.⁹²

⁸⁹ 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.

⁹⁰ 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 Organized Crime.

⁹¹ Case number: No. ԿԴ/0626/01/25.

⁹² Case number: No. ԵԴ/0532/01/21. The defendant was convicted under the previous criminalisation of human trafficking (Article 132 of the CC) which was in force at the time of committing the offence.

132. The notion of abuse of vulnerability is included in the training of investigators, prosecutors and judges on human trafficking.

133. GRETA welcomes the application of the concept of abuse of a position of vulnerability in case-law and invites the Armenian authorities to continue providing training and guidance to relevant professionals on how victims' position of vulnerability may exist or arise and how its abuse may operate in the context of trafficking.

b. Investigation, prosecution and sanctions

134. In its 3rd report on Armenia, GRETA urged the authorities to take additional measures to strengthen the criminal justice response to THB, including by ensuring that human trafficking offences are proactively and promptly investigated, sensitising relevant professionals to the rights of victims and the importance of preventing secondary victimisation, strengthening efforts to investigate, prosecute and convict traffickers of labour exploitation, and ensuring that the length of court proceedings is reasonable.⁹³

135. The rules governing investigations into human trafficking have evolved following the entry into force of the new CCP in July 2022. The Police is responsible for detecting possible criminal offences, either proactively or following a complaint or report, and the Investigative Committee conducts the criminal investigation under the supervision of prosecutors. The Police do not have the power to assess whether a THB investigation should be opened but is obliged to send their findings to the Investigative Committee, together with the evidence collected. Further, the threshold to start an investigation was lowered. If there is a report with elements of a possible crime, the Investigative Committee must launch the investigation either to confirm or reject the suspicions.

136. According to officials met by GRETA, the reform of the criminal procedure has had a positive impact and the number of investigations into human trafficking offences has increased since the police no longer have discretionary power to open investigations. Other interlocutors noted that, due to their reduced role, police officers were less inclined to proactively detect cases. Further, some underlined that the reform has lengthened the timeframes and that, by the time the Investigative Committee starts the investigations, the victims are no longer willing to make statements. Non-governmental actors also noted that there continue to be cases qualified or requalified as lesser offences, such as facilitating prostitution or engaging a child in 'antisocial' activities (e.g., begging), and heavy reliance on the victim's testimony to investigate or prosecute the case as human trafficking. In their comments on the draft report, the Armenian authorities indicated that no cases were requalified as lesser offences in proceedings initiated as human trafficking in 2023-2025 and, on the contrary, cases which were initiated on other grounds were ultimately requalified as human trafficking. Further, according to the authorities when there is a case of a child involved in "antisocial" activities, the possibility that it could be a trafficking case is always assessed. The authorities also underlined that efforts are being made to collect evidence, including through special investigative techniques, in order to reduce reliance on the victims' testimony.

137. There continues to be an Anti-Trafficking Unit at the central level of the Police Department with six police officers. Within the Investigative Committee, the Department for the Investigation of Human Trafficking, Drug Related Offences and Crimes against the Sexual Integrity of Juveniles has seven investigators specialised in human trafficking. Investigations may be conducted by other central departments of the Investigation Committee as well as by its regional departments where there is at least one investigator specialised in human trafficking.⁹⁴ At the General Prosecutor's Office's, there is a Department for Crimes against Human Beings with two prosecutors specialised in trafficking. GRETA was told that while criminal justice professionals are highly specialised at the central level, it is not the case at the local level. In their comments on the draft report, the authorities underlined that prosecutors in

⁹³ See GRETA's 3rd report on Armenia, paragraph 97.

⁹⁴ See GRETA's 3rd report on Armenia, paragraphs 111-112.

the regions are provided with training on human trafficking and on several occasions, they have successfully supervised trafficking cases.

138. Specialised training has continued to be provided to police officers, investigators, prosecutors and judges by the Police Academy and the Judicial Academy on a broad range of topics related to human trafficking and the protection of victims.⁹⁵ Further, in 2025, the Judicial Academy launched the Council of Europe HELP online course on 'Combatting Trafficking in Human Beings', adapted to Armenia's legal context. Further, as part of the programme 'Together against Trafficking in Persons', and implemented by World Vision Armenia, four sets of guidelines on 'trauma awareness and victim-centred approaches when working with victims of human trafficking and exploitation' were developed, respectively, for police officers, investigators, prosecutors and judges, and followed by specific training. In their comments on the draft report, the authorities also informed GRETA of recent training activities for prosecutors.

139. According to official police statistics,⁹⁶ there has been an increase in investigations initiated for human trafficking offences during the reporting period (8 in 2022, 19 in 2023, 36 in 2024, and 27 in 2025). Most investigations related to trafficking for the purpose of labour exploitation. Several investigations concerned trafficking in children for the purpose of sexual exploitation (see paragraph 165), forced begging or domestic servitude. As regards prosecutions, there were 3 cases prosecuted under THB in 2022, 5 in 2023, 5 in 2024 and 9 in 2025.⁹⁷ There was a total of 11 convictions for THB in 2022-2025, including six for labour exploitation and five for sexual exploitation.

140. GRETA was provided with several judgements in cases of THB for different forms of exploitation. One of them related to trafficking for the purpose of labour exploitation in which the defendant forced two children to continue working in a farm, without being paid, as a form of financial compensation for multiple cattle deaths, and used violence against them. The defendant was convicted to 10 years of imprisonment.⁹⁸ Another case concerned trafficking for the purpose of labour exploitation, in which the victim had been trafficked from Armenia to Dubai. It resulted in a negotiated plea agreement to which the victim consented, with a prison sentence of nearly five years (three years suspended).⁹⁹

141. There remain concerns regarding the length of criminal proceedings, particularly in relation to the investigation phase, as well as due to the repeated postponement of trials. In one of the cases provided by the authorities, the investigation started in 2017, and the first instance judgment was passed in 2022. There are cases which were referred to the court in July or October 2024, but the trials had not yet taken place at the time of drafting this report (October 2025).¹⁰⁰ According to the authorities, the length is due to the complexity of trafficking cases, and the high number of witnesses in some cases. It also appears that cases are postponed for logistic reasons or due to the absence of the defence lawyers. In their comments on the draft report, the Armenian authorities specified that there are mandatory timeframes to conduct pre-trial proceedings which depend on the gravity of the offence and can be extended in limited circumstances. However, these timeframes do not apply to the trial phase.

142. GRETA positively notes the efforts to develop the training of relevant professionals and improve the protection of victims of trafficking during criminal proceedings. While the number of investigations has increased, this has not been matched by an increase in convictions. Further, GRETA is concerned by the significant length of criminal proceedings in cases of THB. GRETA stresses that failure to convict traffickers undermines efforts to combat trafficking, protect victims' rights and guarantee their access to justice.

⁹⁵ See the Armenian authorities report to the Committee of the Parties under the 3rd evaluation round, p. 7-8.

⁹⁶ Police data on investigations and prosecutions differs from the data provided by the General Prosecutor's Office in Appendix II due to different data collection methodologies used by these state institutions.

⁹⁷ One case sent to court in 2025 relates to 8 criminal proceedings which were merged.

⁹⁸ Case No. ԳՂ4/0037/01/18.

⁹⁹ Case No. ԵՂ/1126/01/22.

¹⁰⁰ For instance, see case No. ԿՂ/0625/01/24.

143. GRETA urges the Armenian authorities to ensure that human trafficking offences are proactively and promptly investigated, regardless of whether a complaint about the reported crime has been submitted or not, by making use of special investigation techniques in order to gather material, documentary, financial and digital evidence and not having to rely exclusively on testimony by victims or witnesses.

144. GRETA also considers that the Armenian authorities should take further measures to improve the criminal response to human trafficking, including by:

- ensuring that all human trafficking offences are prosecuted as such rather than as lesser offences every time the circumstances of the case allow this, and lead to effective, proportionate and dissuasive sanctions for those convicted;
- continuing to provide training and guidance to investigators, prosecutors and judges on human trafficking, its difference with other related offences, and the rights of victims of victims of THB (see also recommendation in paragraph 145);
- ensuring that the length of court proceedings in cases of trafficking of human beings is reasonable, in line with the case-law of the European Court of Human Rights (Article 6, paragraph 1 of the ECHR) and the standards set by the European Commission for the Efficiency of Justice (CEPEJ).¹⁰¹

c. Protection of victims and witnesses in criminal proceedings

145. Following the entry into force of the new CCP in July 2022, special protection measures in the context of criminal proceedings are provided for in Articles 73 to 85, but the range of measures available has remained unchanged.¹⁰² In addition, during the trial, the new CCP provides for the possibility of questioning victims via video conference (Article 327).

146. For child victims, special protection measures are regulated by Article 329 of the CPC. The mandatory participation of a qualified psychologist in the interviews of children was extended to all children, included those above 16.¹⁰³ Psychologists propose the conditions in which the questioning of the child should take place, they agree on the questions of the investigators, the child's lawyer and the defence lawyers, and conduct the questioning of the child. The questioning cannot last more than two consecutive hours. According to the authorities, there are currently 31 psychologists licensed and trained to participate in interviews of children. Nevertheless, GRETA was told that this number is not sufficient to cover the entire territory. The legislation also provides for the possibility to use only previously video-recorded testimony in order to protect children from having to appear in court rooms.

¹⁰¹ Available at: <https://rm.coe.int/cepej-2018-26-en-rapport-calvez-regis-en-length-of-court-proceedings-e/16808ffc7b>.

¹⁰² See GRETA's 3rd report on Armenia, paragraph 106.

¹⁰³ See GRETA's 3rd report on Armenia, paragraph 128.

147. Since 2022, with the support of UNICEF, the Armenian authorities have developed two Barnahus centres, one in Yerevan and another one in Kapan. There are plans to open two additional centres. The GRETA delegation visited the Barnahus centre of Yerevan, which also has a shelter to accommodate child victims (see paragraph 124). While child victims of crime can also be interviewed in special rooms of the Investigative Committee, efforts are made to promote the use of the Barnahus centre. GRETA was informed that, in 2022-2024, 11 children who were identified as presumed victims of trafficking provided their testimony in the Barnahus centre (two boys and nine girls, all Armenian nationals). GRETA was informed that the introduction of the Barnahus model has not been reflected comprehensively in Armenian legislation, notably in relation to forensic medicine. As a result, the Barnahus centre cannot be used to obtain medical evidence, but mainly to conduct interviews of children.¹⁰⁴ In their comments on the draft report, the Armenian authorities underlined that efforts are ongoing to develop the use of the Barnahus model, make it obligatory in cases involving children, and recognise psychologists as independent procedural actors.

148. According to some interlocutors met, special protection measures are rarely applied, including the possibility of testifying by videoconference during the trial. The use of children's pre-recorded video testimonies should also be systematised. Furthermore, although guidelines on a victim-centred approach and trauma-informed work with victims of human trafficking were developed in 2023 (see paragraph 138), GRETA was informed that the questions asked to victims in court are not always appropriate and further efforts should be made to conduct trauma-informed questionings.

149. GRETA welcomes the existence of a wide range of protection measures for victims of THB, the development of child-friendly procedures and the setting up of two Barnahus centres. However, it underlines that protection measures envisaged in law should be implemented in practice, including the possibility to testify through audiovisual means and to accept the previously recorded testimony of child victims as evidence. GRETA considers that the Armenian authorities should take further measures to protect victims and witnesses of human trafficking during criminal proceedings, including by:

- providing further training to investigators, prosecutors and judges on the range of protection measures available and on trauma-informed interviews;
- amending the legislation to ensure that Barnahus centres can be used to provide the entire range of services relevant to criminal and child protection investigations, including forensic medical examinations of children;
- expanding the number of psychologists licensed and trained to participate in interviews of child victims.

d. Criminalisation of the use of services of a victim

150. The use of services of victims of trafficking, with the knowledge that the person is a victim, is criminalised in Article 190 of the CC, and is punishable by a fine of up to 20 times the minimum wage, or by restriction of liberty for a term of up to two years, or by short-term imprisonment for a term of up to two months, or by imprisonment for a term of up to two years. The penalty is increased in case of aggravated circumstances, notably if the victim is pregnant, in a helpless situation or a child.

151. GRETA was not informed of investigations or convictions in relation to the use of services of a victim of trafficking.

¹⁰⁴ Urumova I., *Needs assessment report on Armenia's deinstitutionalisation and child protection reform including the protection of the rights of unaccompanied and separated children*, p. 20.

152. GRETA considers that Armenian authorities should carry out targeted information campaigns to raise awareness of the criminalisation of the use of services of trafficked persons and increase efforts to sensitise police officers and prosecutors on identifying and prosecuting persons who commit offences under Article 190 of the CC.

e. Non-punishment principle

153. Pursuant to Article 188, paragraph 5, of the CC, victims of human trafficking are exempted from criminal liability for offences of minor and medium gravity which they were forced to commit while being in a trafficking or exploitative situation. This applies to offences punishable by imprisonment of up to five years which includes certain immigration-related crimes, such as illegal border crossing. Further, the Code of Administrative Offences provides that persons shall not be administratively liable in cases of extreme necessity, force majeure, and physical or mental coercion.

154. In the 7th NAP, the Armenian authorities committed to examine the possibility of expanding the scope of the non-punishment provision, but it was finally considered unnecessary. The principle of non-punishment is included in the training of investigators, but there is still no guidance for police and prosecutors on the application of the non-punishment principle.

155. No examples of the application of the non-punishment by police officers, investigators and prosecutors were provided to GRETA. According to the authorities, there has never been a court decision regarding the application of the provision.

156. GRETA recalls that the non-punishment provision should be capable of being applied to all offences that victims of human trafficking were compelled to commit. Traffickers may force victims to commit all kinds of offences, including very serious ones, and victims, because of their age, vulnerable situation or the means of coercion used, may have no choice but to comply. Providing for exceptions on a case-by-case basis, based on the principle of proportionality and the link between trafficking and the offence committed by the victim, rather than excluding *per se* all victims who have committed certain offences, is more in line with the victim centred-approach of the Convention.¹⁰⁵

157. Noting that little efforts have been made since the previous evaluation round, GRETA urges the Armenian authorities to take further measures to ensure that the non-punishment provision is capable of being applied to all offences that victims of THB have been compelled to commit, and to ensure effective compliance with the non-punishment provision. Such measures should include the development of guidance for police officers and prosecutors on the scope and application of the non-punishment provision.

¹⁰⁵ See the Report of the Special Rapporteur on trafficking in persons, especially women and children, Implementation of the non-punishment principle, May 2021, paragraphs 37-38.

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

158. 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.¹⁰⁶ 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.

159. The Armenian authorities have noted an increase in the use of ICT to recruit and exploit victims of trafficking. There are concerns regarding sexual exploitation of children online, as well as fraudulent job offers on the Internet to recruit victims for both labour and sexual exploitation.

160. The NAP 2023-2025 focuses on awareness raising of the risks of trafficking online. Several activities for children on media literacy and online safety were organised, as well as information seminars in higher education institutions on ICT-facilitated trafficking. Video clips on human trafficking were broadcast on the Internet and social media, and information is regularly disseminated by the Anti-trafficking platforms.¹⁰⁷ Further, a cyber security campaign for children, parents and teachers was conducted by the authorities in 2025 and will be renewed in 2026. Despite these efforts, several interlocutors underlined that there is a low level of awareness among children and their parents, particularly in rural areas.

161. The draft Comprehensive Programme for the Protection of the Rights of the Child 2024-2029 prioritises expanding online safety education in the general educational system, large-scale awareness-raising campaigns for children and parents on online risks and safety rules, and developing mechanisms for the protection children's personal data online. According to the recent reform of the child protection system, child safety should be guaranteed online and a procedure for ensuring a safe online environment for children should be established by the Government. The Ministry of High-Tech Industry has also set up a working group to co-ordinate the activities of government agencies in the field of protecting children's rights online, and has concluded a Memorandum of Understanding with the Ministry of Education and an NGO in order to develop joint efforts in this area.

162. In August 2025, a Cyberchat platform was launched with the support of UNICEF as the first online platform in Armenia providing support and information to children in order to ensure their online safety. Operated by the NGO Multilateral Information Institute, it contains materials on online safety for children and allows them to receive technical, legal and psychological support. It also operates a 24/7 hotline.¹⁰⁸ GRETA welcomes the launch of this Cyberchat platform.

¹⁰⁶ Paolo Campana, *Online and Technology-Facilitated Trafficking in Human Beings*, Council of Europe, April 2022, available at: <https://rm.coe.int/online-and-technology-facilitated-trafficking-in-human-beings-full-rep/1680a73e49>.

¹⁰⁷ See the Armenian authorities' reply to GRETA's questionnaire for the 4th evaluation round, pp. 7, 9, 15 and 24.

¹⁰⁸ Available at: <https://chat.cyberhub.am/hy/>.

163. In July 2022, new cybercrime offences entered into force, such as grooming of children under 16 for sexual abuse and exploitation (Article 202 of the CC). A package of laws on Cyber Security were adopted in December 2025. The objective is to establish a cybersecurity framework in Armenia and to set up a new autonomous regulatory authority for information systems. Further, work is ongoing to prepare a comprehensive Cybersecurity Strategy.

164. Within the Armenian Police, there is a division for combating cybercrime with country-wide competency. It provides support to other police departments, such as the Anti-Trafficking Department. As mentioned in paragraph 135, criminal investigations are carried out by the Investigative Committee where several investigators are specialised on cybercrime. GRETA was informed that the Police Anti-Trafficking Department makes efforts to detect cases of human trafficking online, including by monitoring website advertising sexual services or misleading job offers.

165. In recent years, several cases of trafficking facilitated by ICT were detected. Reference is made to a case of 2023 in which a woman made sexual exploitation materials of her children and sent them to her husband who was in prison. An investigation was initiated following the dissemination of the videos of the children's sexual abuses online and the mother was charged with trafficking, sexual acts against children and production and possession of pornographic materials. The proceeding was expanded to other defendants in 2024, and it is pending trial. In another case of 2021, which was mentioned in the previous GRETA report,¹⁰⁹ 15 women sent sexually explicit photos to an Armenian man, posing as an Azerbaijani soldier on social media, in the hope of obtaining news about their missing relatives. The man was convicted of human trafficking.

166. Despite the efforts made by the Armenian authorities to identify cases of ICT-facilitated trafficking and conduct investigations in the cyber space, the number of such cases is low due to lack of resources and capacities of law enforcement authorities. No specific training and guidance on detecting and investigating THB-facilitated by ICT have been developed by the Armenian authorities. With the support of the US government, measures were taken to allow access to the Law Enforcement Services Portal of NCMEC (National Centre for Missing and Exploited Children), but in practice it is difficult to access due to insufficient knowledge of the English language. Further, there were plans to develop a Cyber Laboratory within the Police authorities, but they are currently suspended following the withdrawal of USAID funds. In their comments on the draft report, the Armenian authorities indicated that, in 2025, in the framework of a Council of Europe project (CyberEast +), training was provided on Open-Source Investigation Intelligence (OSINT) in investigating crimes of online sexual abuse and exploitation of children.

167. Moreover, efforts are being made to strengthen co-operation with multinational online service providers, notably with the conclusion of agreements for exchanging information during investigations. The authorities indicated co-operating with Internet Service Providers (ISP) is easy when the operator is in Armenia. However, co-operation with some tech companies is challenging, particularly Telegram which does not respond to any request. Further, GRETA was informed that the Ministry of High Tech collaborates with tech companies to ensure that digital platforms provide educational content and alerts about risks associated by technology-facilitated THB.¹¹⁰ However, no concrete examples of preventive activities undertaken with tech companies were provided.

168. In November 2023, Armenia signed the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence but has not ratified it yet.

¹⁰⁹ See GRETA's 3rd report on Armenia, footnote 6.

¹¹⁰ See the Armenian authorities' reply to GRETA's questionnaire for the 4th evaluation round, p. 23.

169. While welcoming the efforts made to strengthen online safety and improve investigations of cases of human trafficking facilitated by ICT, GRETA considers that the Armenian authorities should make further efforts, including by:

- strengthening awareness raising among children and parents, as well as vulnerable groups (e.g., disadvantaged minorities, migrant workers, etc) about the risks of trafficking facilitated by ICT and ways to respond to online threats;
- improving the detection and proactive investigation of ICT-facilitated trafficking, including online child trafficking, by investing in capacity building and digital tools. This should involve training of law enforcement 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;
- developing co-operation with ICT companies and Internet service providers in order to prevent ICT-facilitated trafficking, as well as to identify victims of human trafficking and collect electronic evidence. This could involve the development of data-sharing procedures with companies holding relevant data and co-operation protocols with private companies, including social network and gig-economy companies as well as rental platforms, to foster the timely provision of information.

170. Further, GRETA invites the Armenian 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 Armenia

1. Legal assistance and free legal aid

171. In its 3rd report on Armenia, GRETA urged the authorities to ensure that legal assistance is provided as soon as there are reasonable grounds for believing that a person is a victim of human trafficking. It also considered that the authorities should ensure that adequate resources are made available for the provision of legal aid by the Public Defenders' Office, and that accredited training is provided to lawyers assisting victims.¹¹¹

172. The legal framework on access to legal assistance and free legal aid for victims of human trafficking remains as described in the third GRETA report.¹¹² Only persons who have been formally recognised as victims of human trafficking by the VIC are entitled to legal assistance, including support and representation by an attorney.

173. As part of the rehabilitation programme for victims of trafficking, the Sexual Violence Crisis Centre employs a lawyer and refers formally identified victims to the Public Defenders' Office (Chambers of Advocates) for assistance and representation in legal proceedings. Public defenders are lawyers specialised either in criminal or civil/administrative proceedings. GRETA was informed that all of them have participated in training courses on the identification of victims of human trafficking. Further, in the framework of the Programme 'Together against Trafficking in Persons', several training courses were organised for public defenders and lawyers in the private sector on ensuring victim-centred approach in human trafficking cases.¹¹³ According to the Public Defender's Office, it is difficult to provide legal assistance to foreign victims of human trafficking because it does not have the necessary budget to hire interpreters to communicate and meet with victims. It can have recourse to UNHCR's pool of interpreters, but this is limited to victims who are asylum seekers or refugees.

174. According to the Armenian authorities, two formally identified victims received legal assistance in 2022, five in 2023 (including two who were provided with a lawyer/public defender), and one in 2024. Different statistics are mentioned in the report on the monitoring of the rehabilitation programme, according to which 17 victims were provided with legal assistance in 2022 and 3 in the first half of 2023. These numbers also differ from the statistics provided by the Public Defenders' Office, according to which no victims of human trafficking were assisted by a public defender in 2022, three in 2023, 16 in 2024 and five in the first four months of 2025.

175. GRETA once again urges the Armenian authorities to ensure that legal assistance is provided as soon as there are reasonable grounds for believing that a person is a victim of human trafficking, before the person concerned has to decide whether or not he/she wants to co-operate with the authorities and/or make an official statement.

176. Further, GRETA considers that the Armenian authorities should:

- ensure that adequate resources are made available for the provision of legal assistance and free legal aid to victims of THB by the Public Defender's Office, including for the use of interpreters to communicate with foreign victims;
- continue providing training to lawyers, including public defenders, on assisting victims of human trafficking.

¹¹¹ See GRETA's 3rd report on Armenia, paragraphs 54-55.

¹¹² See GRETA's 3rd report on Armenia, paragraphs 47-50.

¹¹³ <https://antitrafficking.am/vv-training-lawyers/>.

2. Compensation

177. In its 3rd report on Armenia, GRETA urged the authorities to guarantee effective access to compensation for victims of trafficking. Further, it considered that the provision of state compensation should be disconnected from the acceptance of assistance measures by victims and should be based on the fact that they have suffered.¹¹⁴

178. There have been no changes to the legal framework on victims' access to compensation from perpetrators. Victims can claim compensation during the criminal proceedings and/or in a civil court. Compensation in criminal proceedings is limited to material damages. Moral damages can only be requested before a civil court. In exceptional cases, when the victim has no opportunity to represent his/her interests, the criminal court may award compensation at its own initiative.¹¹⁵

179. According to the authorities, efforts are made to seize and confiscate perpetrators' assets with a view to securing compensation. GRETA was informed that in 2022, the defendants' assets were seized in two human trafficking cases, but their value was not specified. In 2023, assets worth nearly \$60 000 were seized in an alleged trafficking case that was subsequently reclassified under other offences.¹¹⁶ Officials indicated that conducting financial investigation is particularly challenging as traffickers mostly use cash.

180. No victims have been granted compensation in criminal proceedings during the reporting period. GRETA was told that in practice few victims of trafficking request it, notably because they are not properly informed of their right, and judges do not use the possibility to grant it ex officio. GRETA notes that the information sheet for victims developed in 2023 only refers to the one-off state compensation, but not to the possibility to obtain compensation from the perpetrators. Several interlocutors also pointed out that victims are reluctant to claim compensation for fear of being in contact with the perpetrators, but also because the procedures are lengthy and offer little hope of obtaining a favourable decision.

181. According to NGOs, in the few cases where compensation is claimed, criminal judges expect a high level of proof of the damage suffered by the victim. In particular, they reportedly request an employment contract in order to calculate unpaid wages of victims of labour exploitation. As a result, victims have to claim compensation in civil courts. For victims of sexual exploitation, compensation claims are rejected because it is not possible to know the number of clients of the victim.

182. GRETA was not informed of training for lawyers, prosecutors and judges on compensation of victims of human trafficking. According to several interlocutors, there is a need for more capacity building on their role in this regard.

183. There have been no changes to the legal framework related to state compensation.¹¹⁷ Pursuant to Article 22, paragraph 16, of the Anti-Trafficking Law, persons who have been formally identified as victims of human trafficking can receive a one-off lump sum of AMD 250 000 (approximately EUR 555). It is awarded by decision of the VIC upon termination of the assistance provided to identified victims and is designed to support their reintegration. Therefore, as previously noted by GRETA, the granting of the one-off lump sum is conditioned on the victims' acceptance of other assistance measures.

¹¹⁴ See GRETA's 3rd report on Armenia, paragraphs 82-84.

¹¹⁵ See GRETA's 3rd report on Armenia, paragraphs 69-70.

¹¹⁶ See the Armenian authorities report to the Committee of the Parties under the 3rd evaluation round, p. 6.

¹¹⁷ See GRETA's 2nd report on Armenia, paragraph 136.

184. The amount of the one-off lump sum has not been increased. GRETA notes that it does not take into account the damages suffered by victims, making it more of a financial aid than a proper state compensation scheme. GRETA refers to the Committee of Ministers' Recommendation on rights, services and support for victims of crime, according to which the level of the compensation award should take into account, at a minimum, costs relating to treatment and rehabilitation for physical and psychological injuries, loss of income, and funeral expenses and loss of maintenance for dependents.¹¹⁸

185. According to official statistics, two persons received the one-off lump sum in 2022, seven in 2023 and seven in 2024. These numbers are considerably lower than the number of victims who were formally identified during the reporting period. GRETA notes with concerns that as the annual budget of the state compensation programme is limited to AMD 1 750 000 (around EUR 4 000), the number of victims who can receive it is limited to seven.

186. GRETA is concerned that access to compensation for victims of human trafficking continues to be ineffective in Armenia. The NAP for 2023-2025 does not contain any measures in relation to the compensation of victims of trafficking, either from the perpetrators or from the State.

187. GRETA once again urges the Armenian authorities to take additional measures to facilitate and guarantee access to compensation for victims of trafficking, including by:

- ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain by the perpetrator from the exploitation of the victim or the loss sustained by the victim, is part of the criminal investigation with a view to supporting compensation claims in courts;
- 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;
- ensuring that victims can effectively receive compensation for the full damage suffered as part of the criminal proceedings, including moral damage and lost earnings from exploitation in prostitution, and that proving the harm suffered does not place an unnecessary or disproportionate burden on victims;
- ensuring that victims of trafficking are systematically informed in a language that they can understand of the right to seek compensation and the procedures to be followed;
- providing training to lawyers, investigators, prosecutors and judges on their role in supporting victims' claims for compensation, and how to calculate compensation awards;
- introducing a mechanism to guarantee the compensation of victims of human trafficking by the State, for example through the establishment of a fund for victim compensation or by making compensation awarded in criminal proceedings payable by the State in advance, with the State taking the responsibility to recover the amount from the offender.

188. Further, GRETA considers that the Armenian authorities should increase the amount of the one-off lump sum, disconnect its provision from the acceptance of other assistance measures and ensure that all victims effectively receive it.

¹¹⁸ Recommendation CM/Rec(2023)2 of the Committee of Ministers to member States on rights, services and support for victims of crime, Article 14, paragraph 2.

VI. Conclusions

189. Since the publication of GRETA's third report on Armenia on 31 May 2022, progress has been made in a number of areas covered by that report.

190. The Armenian authorities have further developed the legislative framework relevant for action against trafficking in human beings, through the new Criminal Code, which entered into on 1 July 2022, amendments to the Law on Identification and Support to Persons Subjected to Trafficking in Human Beings and Exploitation and the Labour Code, and a legislative package on the rights of the child. The conclusions of the external evaluation of the 6th National Action Plan for the Fight against Trafficking and Exploitation of Human Beings were taken into account for the design of the 7th National Action Plan (2023-2025). Further, an assessment of the National Referral Mechanism (NRM) was carried out and the number of NGOs that can refer possible victims for identification was increased. Moreover, the Armenian authorities have conducted an evaluation of the support programme for victims of human trafficking. Tools and training have been developed to improve the detection of victims and the investigation of cases. These efforts have resulted in an increase in the number of identified victims and investigations into human trafficking offences.

191. GRETA welcomes these positive developments in Armenia. However, despite the progress achieved, several issues continue to give rise to concern. A certain number of 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 Armenian authorities to take action in the following areas:

- Prevention of trafficking for the purpose of labour exploitation (Article 5 of the Convention). The Armenian authorities should extend the mandate of the Health and Labour Inspection Body and provide it with adequate human, material and financial resources to enable it to conduct proactive and unannounced inspections in all workplaces, including unregistered companies and informal workplaces. They should also regulate and monitor recruitment and temporary work agencies to strengthen the prevention of THB and provide safe and anonymous reporting and complaint mechanisms for migrant workers.
- Compensation (Article 15 of the Convention). The Armenian authorities should facilitate access to compensation for victims of trafficking, including by ensuring that the collection of evidence about the harm the victim has suffered is part of the criminal investigation, making full use of the legislation on the freezing and forfeiture of assets, and ensuring that victims can effectively receive compensation for the full damage suffered, including moral damage and lost earnings from exploitation in prostitution, as part of the criminal proceedings. Further, a mechanism to guarantee the compensation of victims by the State should be introduced.

192. 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.

193. As regards the thematic focus of the fourth evaluation round, which is on vulnerabilities to trafficking in human beings, the Armenian authorities acknowledge that most common vulnerability factors abused by traffickers are poverty, poor housing conditions, unemployment, lack of education and isolation. Children and young people leaving alternative care, as well as persons with disabilities and/or mental disorders, are vulnerable to THB for different forms of exploitation. Girls and women of the Yezidi minority are vulnerable to child, early and forced marriage. Migrant workers in Armenia as well as Armenian nationals looking for work opportunities abroad are also vulnerable to human trafficking. Further, asylum seekers and refugees face difficulties in their integration which increase their vulnerability to trafficking and exploitation.

194. While welcoming the measures taken by the Armenian authorities to prevent human trafficking through awareness-raising in schools, targeted sensitisation of vulnerable groups and information campaigns for the general public, GRETA has identified a number of areas of concern which require further action. The following issues should be addressed as a matter of priority:

- reinforce the prevention of trafficking of children and young people, including by increasing the funding, resources and capacities of the bodies responsible for the protection of children, reducing the risks of trafficking in children and young people placed in alternative care or leaving alternative care, and strengthening the enforcement of legal safeguards against harmful and prohibited child labour;
- strengthen awareness raising of the risks of human trafficking amongst members of disadvantaged minorities, improve their socio-economic inclusion, and prevent child and forced marriages;
- improving access to employment, education and independent living for persons with disabilities and implementing mechanisms for detecting, preventing and responding to violence, exploitation and abuse against persons with disabilities in institutions;
- strengthen the provision of information to migrant workers, provide further training on trafficking in human beings to relevant professionals and develop co-operation with the main countries of origin/destination of migrant workers;
- address the vulnerabilities to human trafficking of persons seeking international protection, including by putting in place procedures for the vulnerability assessment of asylum seekers and refugees and improving their social and economic integration.

195. In addition, GRETA calls on the Armenian authorities to take further measures to ensure effective compliance with the non-punishment provision, including the development of guidance for police officers and prosecutors on the scope and application of this provision.

196. GRETA welcomes the efforts made in Armenia to strengthen online safety and improve investigations of cases of human trafficking facilitated by ICT. In order to address the routine use of ICT to recruit and exploit victims of trafficking, the Armenian authorities should strengthen the awareness of children, parents and vulnerable groups of the risks of recruitment and exploitation facilitated by ICT, improve the detection and proactive investigation of ICT-facilitated trafficking offences, and develop capacity building and digital tools, as well as co-operation with ICT companies and Internet service providers.

197. GRETA invites the Armenian 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 Armenia to sustain the efforts to combat human trafficking by following the human-rights based approach of the Convention, and looks forward to continuing the dialogue with the Armenian authorities and civil society.

Appendix 1

Table with statistics on victims and cases of THB in Armenia in 2022-2025

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.

Indicators		Years			
		2022	2023	2024	2025 ²
Number of presumed victims ¹		8	45	43	14
Number of identified victims		6	25	25	34
Sex and age group	Women	4	9	10	8
	Men	1	10	6	20
	Girls	0	3	4	4
	Boys	1	3	5	2
Type of exploitation	Sexual	4	7	11	5
	Labour	2	18	14	29
Nationality	Armenian	6	25	24	21
	Turkmenistan	0	0	1	0
	Tajikistan	0	0	0	13
Country of exploitation	Armenia	n/a	23	n/a	15
	Russia	n/a	2	n/a	1
	USA	0	0	0	1
Number of victims assisted		6	23	25	26
Number of investigations (initiated) *		8	27	38	29
Type of exploitation	Sexual	4	4	20	15
	Labour	4	23	18	14
Number of prosecutions (cases sent to court) *		3	6	2	6
Type of exploitation	Sexual	2	4	1	6
	Defendants	2	6	2	8
	Labour	1	2	1	3
	Defendants	2	2	2	3
Number of convictions (persons)		2	2	6	1
Criminal offence	Trafficking in human beings	0	1	1	n/a
	Trafficking in children or helpless person	2	1	5	n/a
Type of exploitation	Sexual	0	0	4	1
	Labour	2	2	2	0

N/A: not available.

¹ Persons referred to the Victim Identification Commission.

² The data on country of exploitation provided by the authorities are incomplete as they do not match the total number of victims identified in 2025. Further, the number of presumed victims is lower than the number of identified victims.

* Source: General Prosecutor's Office. It differs from the data collected by the Police and other institutions.

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.

Topics related to the fourth evaluation round of the Convention

Prevention of trafficking in human beings

- GRETA welcomes the focus of the draft 8th NAP and invites the Armenian authorities to ensure that the findings and recommendations of research are taken into account in the design and implementation of preventive policies and activities (paragraph 31);
- Noting the importance of taking into account the lived experiences and views of victims and survivors of trafficking when designing anti-trafficking policies and measures, GRETA invites the Armenian authorities to set up a trafficking survivors' advisory council (paragraph 32).

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

Children and young people

- While welcoming the adoption of the long-awaited reform of the child protection system, which paves the way for establishing a system capable of supporting children in vulnerable situations, GRETA considers that the Armenian authorities should take additional measures to prevent trafficking of children and young people, including by:
 - ensuring that the implementation of the reform of the child protection system is guaranteed by the necessary secondary legislation;
 - increasing the funding, resources and capacities of the bodies responsible for the protection of children, in particular guardianship and trusteeship commissions, to enable them to play an effective role in the prevention of child trafficking;
 - reducing the risks of trafficking in children and young people placed in alternative care or leaving alternative care, including by developing a monitoring system of alternative care providers;
 - developing early mechanisms and regular outreach work to detect children at risk of becoming victims of human trafficking, including trafficking facilitated by ICT (see also the recommendation in paragraph 113);
 - strengthening the enforcement of legal safeguards against harmful and prohibited child labour, including through prevention, effective control and referral of cases. The involvement of labour inspectors in preventing and combating child labour should be strengthened (see also the recommendation in paragraph 77);
 - strengthening prevention of, and response to, cases of children who are out of school;
 - continuing to raise awareness of children, parents and foster families of the risks of human trafficking, paying particular attention to vulnerable children, such as children placed in alternative care, children from disadvantaged minorities, children with disabilities and children who are out of school;

- continuing to provide training on trafficking in human beings and its different forms to professionals working with children, in particular teachers, school staff, social workers and members of guardianship and trusteeship commissions (paragraph 47).

Disadvantaged minorities

- GRETA considers that the Armenian authorities should make additional efforts to prevent trafficking in human beings of members of disadvantaged minorities, including by:
 - strengthening awareness raising of the risks of human trafficking amongst them;
 - preventing child and forced marriages, notably through training of relevant professionals (including education staff, social workers, child protection officers, law enforcement officers, prosecutors and judges) and targeted awareness raising amongst disadvantaged minorities;
 - improving the socio-economic inclusion of disadvantaged minorities, notably their access to education (see also the recommendation in paragraph Error! Reference source not found.);
 - involving organisations representing disadvantaged minorities in the design and implementation of anti-trafficking policies and measures (paragraph 53).

Persons with disabilities

- GRETA considers that the Armenian authorities should make additional efforts to prevent human trafficking of persons with disabilities, including by:
 - conducting research into the vulnerabilities of persons with disabilities to trafficking in human beings;
 - raising awareness among persons with disabilities of the risks of THB, in an accessible manner;
 - improving access to employment, education and independent living for persons with disabilities;
 - implementing mechanisms for detecting, preventing and responding to violence, exploitation and abuse against persons with disabilities in institutions, ensuring that occupational therapy is not abused to exploit such persons, and providing adequate training to relevant staff in this regard (paragraph 62).

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 once again urges the Armenian authorities to:
 - extend the mandate of the Health and Labour Inspection Body and provide it with adequate human, material and financial resources to enable it to conduct proactive and unannounced inspections in all workplaces, including unregistered companies and informal workplaces;
 - prohibit recruitment fees and related costs borne by workers or jobseekers;
 - regulate and monitor recruitment and temporary work agencies to strengthen prevention of THB and labour exploitation. This should include the introduction of a legally binding certification of recruitment agencies which act as intermediaries for migrant workers arriving in Armenia and ensuring that such workers are provided with employment terms, contracts and payslips in a language they understand;
 - ensure that migrant workers have access to safe reporting mechanisms and effective anonymous complaint mechanisms so that victims of abuse or exploitation can submit their case without fear of reprisals (paragraph 77);

- GRETA considers that the Armenian authorities should take additional measures to address the vulnerabilities of migrant workers, including by:
 - providing further training on trafficking in human beings to relevant professionals, notably labour inspectors and staff of the Unified Social Services, with a focus on vulnerabilities that lead to THB and on early detection of cases of THB for the purpose of labour exploitation;
 - strengthening the provision of information to migrant workers about labour standards, risks of human trafficking, and the rights of victims of trafficking;
 - developing co-operation with the main countries of origin/destination of migrant workers with a view to preventing trafficking for labour exploitation;
 - building strategic partnerships with civil society, trade unions and the private sector on the prevention of trafficking for the purpose of labour exploitation (paragraph 78).

Asylum seekers and refugees

- GRETA welcomes the efforts made by the Armenian authorities to provide support to, and improve the inclusion of, refugees from Karabakh in Armenia and invites them to continue their efforts (paragraph 84);
- GRETA considers that the Armenian authorities should take additional measures to address the vulnerabilities to trafficking in human beings of persons seeking international protection in Armenia, including by:
 - putting in place procedures for the vulnerability assessment of asylum seekers and refugees and ensuring their effective implementation;
 - improving access to translation and interpretation during the asylum procedure;
 - further developing the training of relevant professionals, notably officers of the Migration and Citizenship Service, on detecting vulnerabilities to human trafficking;
 - raising awareness of asylum seekers and refugees of the risks of human trafficking and the rights of victims of THB;
 - improving the social and economic integration of asylum seekers and refugees, notably their access to employment and housing;
 - strengthening the rules on the appointment of legal guardians for unaccompanied or separated children, and providing these children with safe accommodation, as well as professionals and services capable of assisting them (paragraph 88).

Persons engaged in prostitution

- GRETA considers that the Armenian authorities should take additional measures to reduce the vulnerabilities to human trafficking of persons engaged in prostitution, including by abrogating the administrative offence of engaging in prostitution and developing exit programmes for persons wishing to leave prostitution (paragraph 94).

LGBTI persons

- GRETA considers that the Armenian 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 urges the Armenian authorities to take further steps to improve the identification of victims of trafficking in human beings, including by:
 - reinforcing the role of labour inspectors and staff of the Unified Social Services in the detection of victims;
 - improving the identification of victims among migrant workers, asylum seekers, refugees and migrants in irregular situation, including in the reception centre for asylum seekers and in prisons;
 - establishing mechanisms for the early detection of victims of THB, such as mobile units in co-operation with civil society organisations (paragraph 113);
- GRETA considers that the Armenian authorities should:
 - review the threshold of proof applied by the Victim Identification Commission when identifying victims of human trafficking to ensure that it does not resemble that of criminal proceedings;
 - ensure that regular training on identifying victims of THB is provided to relevant professionals, including police officers, asylum officials, labour inspectors, child protection officers, educational staff, social workers, prison staff, professionals working in institutions for persons with disabilities, and health-care professionals (paragraph 114).

Assistance to victims

- GRETA considers that the Armenian authorities should make efforts to improve assistance to victims of THB, in particular by:
 - providing adequate and sustainable state funding for victim support delegated to NGOs;
 - strengthening support to victims of human trafficking in accessing the labour market and housing;
 - ensuring that presumed and formally identified foreign victims have access to adequate assistance, including access to interpreters when needed;
 - improving specialised care and psychological support for victims of trafficking who have disabilities or mental health issues;
 - providing training to staff supporting victims of trafficking, including staff of medical institutions (paragraph 126).

Notion of “abuse of a position of vulnerability” in the law and case-law

- GRETA welcomes the application of the concept of abuse of a position of vulnerability in case-law and invites the Armenian authorities to continue providing training and guidance to relevant professionals on how victims' position of vulnerability may exist or arise and how its abuse may operate in the context of trafficking (paragraph 133).

Investigation, prosecution and sanctions

- GRETA urges the Armenian authorities to ensure that human trafficking offences are proactively and promptly investigated, regardless of whether a complaint about the reported crime has been submitted or not, by making use of special investigation techniques in order to gather material, documentary, financial and digital evidence and not having to rely exclusively on testimony by victims or witnesses (paragraph 143);

- GRETA also considers that the Armenian authorities should take further measures to improve the criminal response to human trafficking, including by:
 - ensuring that all human trafficking offences are prosecuted as such rather than as lesser offences every time the circumstances of the case allow this, and lead to effective, proportionate and dissuasive sanctions for those convicted;
 - continuing to provide training and guidance to investigators, prosecutors and judges on human trafficking, its difference with other related offences, and the rights of victims of victims of THB (see also recommendation in paragraph 145);
 - ensuring that the length of court proceedings in cases of trafficking of human beings is reasonable, in line with the case-law of the European Court of Human Rights (Article 6, paragraph 1 of the ECHR) and the standards set by the European Commission for the Efficiency of Justice (CEPEJ) (paragraph 144).

Protection of victims and witnesses in criminal proceedings

- GRETA considers that the Armenian authorities should take further measures to protect victims and witnesses of human trafficking during criminal proceedings, including by:
 - providing further training to investigators, prosecutors and judges on the range of protection measures available and on trauma-informed interviews;
 - amending the legislation to ensure that Barnahus centres can be used to provide the entire range of services relevant to criminal and child protection investigations, including forensic medical examinations of children;
 - expanding the number of psychologists licensed and trained to participate in interviews of child victims (paragraph 149).

Criminalisation of the use of services of a victim

- GRETA considers that Armenian authorities should carry out targeted information campaigns to raise awareness of the criminalisation of the use of services of trafficked persons and increase efforts to sensitise police officers and prosecutors on identifying and prosecuting persons who commit offences under Article 190 of the CC (paragraph 152).

Non-punishment principle

- Noting that little efforts have been made since the previous evaluation round, GRETA urges the Armenian authorities to take further measures to ensure that the non-punishment provision is capable of being applied to all offences that victims of THB have been compelled to commit, and to ensure effective compliance with the non-punishment provision. Such measures should include the development of guidance for police officers and prosecutors on the scope and application of the non-punishment provision (paragraph 157).

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

- While welcoming the efforts made to strengthen online safety and improve investigations of cases of human trafficking facilitated by ICT, GRETA considers that the Armenian authorities should make further efforts, including by:
 - strengthening awareness raising among children and parents, as well as vulnerable groups (e.g., disadvantaged minorities, migrant workers, etc) about the risks of trafficking facilitated by ICT and ways to respond to online threats;
 - improving the detection and proactive investigation of ICT-facilitated trafficking, including online child trafficking, by investing in capacity building and digital tools. This should involve training of law enforcement 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;
 - developing co-operation with ICT companies and Internet service providers in order to prevent ICT-facilitated trafficking, as well as to identify victims of human trafficking and collect electronic evidence. This could involve the development of data-sharing procedures with companies holding relevant data and co-operation protocols with private companies, including social network and gig-economy companies as well as rental platforms, to foster the timely provision of information (paragraph 169);
- GRETA invites the Armenian authorities to ratify the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence (paragraph 170).

Follow-up topics specific to Armenia

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

- GRETA considers that the Armenian authorities should strengthen inter-agency co-ordination at local and regional level with a view to strengthening the prevention of human trafficking and the protection of victims (paragraph 21);
- GRETA considers that the Armenian authorities should finalise the process of establishing an independent National Rapporteur, supported by dedicated funding, with a view to ensuring an effective monitoring of the anti-trafficking activities of state institutions and making recommendations to persons and institutions concerned (paragraph 22);
- GRETA welcomes the external evaluation of the 6th NAP and invites the Armenian authorities to continue commissioning external evaluations of the implementation of the NAPs as a tool for assessing the impact of the activities and for planning future policies and measures to combat trafficking (paragraph 23);
- GRETA considers that the Armenian authorities should ensure the allocation of adequate and sustainable funding for the implementation of the National Action Plans and related anti-trafficking activities (paragraph 25).

Legal assistance and free legal aid

- GRETA once again urges the Armenian authorities to ensure that legal assistance is provided as soon as there are reasonable grounds for believing that a person is a victim of human trafficking, before the person concerned has to decide whether or not he/she wants to co-operate with the authorities and/or make an official statement (paragraph 175);

- GRETA considers that the Armenian authorities should:
 - ensure that adequate resources are made available for the provision of legal assistance and free legal aid to victims of THB by the Public Defender's Office, including for the use of interpreters to communicate with foreign victims;
 - continue providing training to lawyers, including public defenders, on assisting victims of human trafficking (paragraph 176).

Compensation

- GRETA once again urges the Armenian authorities to take additional measures to facilitate and guarantee access to compensation for victims of trafficking, including by:
 - ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain by the perpetrator from the exploitation of the victim or the loss sustained by the victim, is part of the criminal investigation with a view to supporting compensation claims in courts;
 - 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;
 - ensuring that victims can effectively receive compensation for the full damage suffered as part of the criminal proceedings, including moral damage and lost earnings from exploitation in prostitution, and that proving the harm suffered does not place an unnecessary or disproportionate burden on victims;
 - ensuring that victims of trafficking are systematically informed in a language that they can understand of the right to seek compensation and the procedures to be followed;
 - providing training to lawyers, investigators, prosecutors and judges on their role in supporting victims' claims for compensation, and how to calculate compensation awards;
 - introducing a mechanism to guarantee the compensation of victims of human trafficking by the State, for example through the establishment of a fund for victim compensation or by making compensation awarded in criminal proceedings payable by the State in advance, with the State taking the responsibility to recover the amount from the offender (paragraph 187);
- GRETA considers that the Armenian authorities should increase the amount of the one-off lump sum, disconnect its provision from the acceptance of other assistance measures and ensure that all victims effectively receive it (paragraph 188).

Appendix 3

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

Public bodies

- Working Group on Combating Trafficking in Human Beings
- Ministry of Social and Labour Affairs
- Ministry of Foreign Affairs
- Ministry of Education, Science, Culture and Sport
- Ministry of Health
- Ministry of High-Tech Industry
- Ministry of Defence
- Ministry of Justice
- Ministry of Internal Affairs:
 - o Migration and Citizenship Service
 - o Police Department
- General Prosecutor's Office
- Investigative Committee
- Health and Labor Inspectorate
- Statistical Committee
- National Institute of Labour and Social Research
- National Assembly
- Public Defender's Office
- Human Rights Defender

Kotayk Region

- Kotayk Regional Investigative Department
- Kotayk Regional Police

Intergovernmental organisations

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

Non-governmental organisations

- Armenian Caritas
- Association of Audio-Visual Reporters
- Democracy Today
- Full Life
- Hope and Help
- Human Rights Research Centre
- Mer Doon
- People in Need
- Pink Armenia
- Sexual Violence Crisis Centre
- SOS Children's Villages Foundation
- UMCOR Foundation Armenia
- Women's Resource Centre in Hrazdan

Government's comments

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

GRETA engaged in a dialogue with the Armenian 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 Armenian authorities on 1 April 2026 and invited them to submit any final comments. The comments of the authorities, submitted on 18 May 2026, are reproduced hereafter.

FINAL COMMENTS

on the final report adopted by the Group of Experts on Action against Trafficking in Human Beings (GRETA) at its 56th meeting (2-6 March 2026) concerning the implementation of the Convention by Armenia (fourth evaluation round)

Paragraph 26

Comment: following the official circulation of the draft National Action Plan for Combating Human Trafficking and Exploitation for 2026–2028, the opinions of state institutions and NGOs have been received and summarized, and the process of budgeting the strategic document is at the finalization stage.

Paragraphs 63-78

Comment: a guiding document has been developed outlining the rights and obligations of migrants arriving in Armenia. The unified guideline outlining the rights and obligations of migrants arriving in Armenia for employment purposes has been translated into English, Russian, Hindi and Persian with the support of partners of the Armenian office of the International Organization for Migration. It has been published on the regularly updated “Migrants in Armenia” Facebook page. In addition, informational boards containing QR codes have been installed at bus stops and metro stations.

Paragraph 114, subparagraph 2

Comment: in 2025, 473 penitentiary officers (senior, mid-level, and junior groups) were trained on the topic of “Prevention of Human Trafficking”, with a duration of two academic hours. Trainings will have a continuous nature in order to ensure that penitentiary officers of all levels have a comprehensive grasp of peculiarities of identifying victims of THB.

Paragraph 133

Comment: it is noteworthy that the topic of trafficking is thoroughly addressed and included in the regular trainings provided by the Academy of Justice.

Paragraph 141

Comment: Ministry of Justice has developed and circulated a draft precisely regulating the deadlines in criminal proceedings, which will ensure the protection of the right to a fair trial.

Paragraphs 142 and 53

Comment: an important issue for the access of national minorities to education is the training of specialists in these languages, as well as the creation of opportunities for organizing distance learning. This issue was addressed at the meetings of the Council on National Minorities on 08.04.25 and 16.07.25. At the November 27, 2025 session of the Council, the Higher Education and Science Committee of the Ministry of Higher Education and Science presented a proposal to create a unified system for training the necessary number of qualified specialists in minority languages, with its own stable infrastructure. Also, a laboratory dealing with national minority issues will be established within the framework of the Institute of Humanitarian Studies of Yerevan State University in 2026, where work aimed at teaching national minority languages and training qualified specialists will be carried out, as well as studies and research on national minorities.

Paragraph 149

- providing further training to investigators, prosecutors and judges on the range of protection measures available and on trauma-informed interviews;

Comment: trainings on the criminal procedure issues, as well as the status of victims are regularly conducted for judges, investigators and prosecutors. In 2025, a training course titled “Specific Features of

the Status of Victims in Criminal Proceedings” was attended by 38 prosecutors and 76 investigators, and “Current Issues of the Criminal Procedure” - by 107 sitting judges and 5 judicial candidates.

- amending the legislation to ensure that Barnahus centres can be used to provide the entire range of services relevant to criminal and child protection investigations, including forensic medical examinations of children

Comment: expansion of the use of “Barnahus” centres is a priority. A draft has been developed and circulated aimed at implementing institutional reforms in this area. The draft proposes recognizing the psychologist as an independent procedural actor. It further envisages that investigative and judicial actions involving children should be conducted in multidisciplinary centers (“Barnahus” model), which implies a change in the physical environment in which such actions are carried out, in order to avoid, as far as possible, traumatic experiences and the need for children to confront the accused. It is also proposed to establish a special deposition procedure for cases where it is necessary to ensure the subsequent admissibility and use in court of testimony given by a child victim, witness, or accused during the pre-trial investigation, with the aim of avoiding repeated questioning.

- expanding the number of psychologists licensed and trained to participate in interviews of child victims

Comment: the Ministry of Justice conducts the proceedings for licensing psychologists in a continuous manner.

Paragraph 160:

Comment:

- In the course of 2025, the Ministry of High-Tech Industry in cooperation with UNICEF and the «Izmirlan» Charitable Foundation, undertook a series of measures aimed at strengthening the protection of children’s rights in the online environment. Following discussions initiated in April, a working group was established by Order No. 865-A of the Minister of High-Tech Industry, dated 25 April, to coordinate the engagement of relevant state bodies. The roadmap developed by UNICEF was subsequently refined in several stages, incorporating observations and recommendations provided by ministries, the Human Rights Defender, and civil society organizations. Efforts to further improve and elaborate the roadmap on the protection of children’s rights in the online environment are ongoing.
- From 1 August to 14 October 2025, within the framework of the Ministry’s «Mass Education» programme, technological training courses were delivered across seven regions (Armavir, Ararat, Aragatsotn, Kotayk, Lori, Shirak, and Tavush). The programme engaged more than 700 participants, who acquired introductory knowledge in programming, artificial intelligence, cybersecurity, and contemporary technological fields.
- In 2026, a total of 800 participants from Yerevan and the regions are expected to take part in the «Mass Education» programme. The training will be implemented through modules covering digital and artificial intelligence literacy, cybersecurity, and soft skills, and will target the following groups:
 - ✓ senior secondary school students aged 15–17;
 - ✓ young people aged 18–29;
 - ✓ women aged 30–40;
 - ✓ beneficiaries of social and family assistance programmes;
- The training courses will be provided free of charge and will be delivered in both in-person and online formats.

Paragraphs 42, 131 and 165 (in the draft Report they are paragraphs 41, 130 and 164 respectively)

Comment: mentioned cases are at the stage of the main hearings.

Paragraphs 134, 144:

Comment: cases should be examined within a reasonable time.

Paragraph 144

Comment: it is necessary to apply "effective, proportionate and dissuasive sanctions" in trafficking cases.

Appendix 1**Comments:**

- **Number of investigations (initiated):** Information in the table provided by the General Prosecutor office. According to the information provided by the Police of the Ministry of Internal Affairs, the number of registered crimes related to human trafficking or exploitation was 8 in 2022, 19 in 2023 (https://armstat.am/file/article/soc_sit_2023_en_30.pdf, see page 289), 36 in 2024 (https://armstat.am/file/article/soc_sit_2024_en_30.pdf, see page 302) and 27 in 2025 (https://armstat.am/file/article/sv_12_25a_530.pdf, see page 180).
- **Number of prosecutions (cases sent to court).** Information in the table provided by the General Prosecutor office. According to other relevant institutions, the number of proceedings sent to court in human trafficking and exploitation was 5 in 2023 (https://armstat.am/file/article/soc_sit_2023_en_30.pdf see page 297) and 5 in 2024 (https://armstat.am/file/article/soc_sit_2024_en_30.pdf see page 312).