

**Committee of the Parties  
to the Council of Europe Convention  
on Action against Trafficking in Human Beings**



**Recommendation CP/Rec(2025)02  
on the implementation of the Council of Europe Convention  
on Action against Trafficking in Human Beings  
by Ukraine**

*adopted at the 36th meeting of the Committee of the Parties  
on 20 June 2025*

The Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings (hereinafter referred to as "the Convention"), acting under the terms of Article 38(7) of the Convention;

Having regard to the purposes of the Convention to prevent and combat trafficking in human beings, while guaranteeing gender equality, protect the human rights of victims of trafficking, design a comprehensive framework for the protection and assistance of victims and witnesses, ensure the effective investigation and prosecution of the offences related to trafficking in human beings, and promote international co-operation;

Bearing in mind the provisions of Article 36(1) of the Convention concerning the monitoring role of the Group of Experts on Action against Trafficking in Human Beings (GRETA) in the implementation of the Convention;

Having regard to the Rules of Procedure of the Committee of the Parties;

Having regard to the instrument of ratification deposited by Ukraine on 29 November 2010;

Recalling Committee of the Parties' Recommendation CP/Rec(2018)29 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Ukraine and the report of the Ukrainian authorities on measures taken to comply with this recommendation, submitted on 20 May 2020;

Having examined the third report concerning the implementation of the Convention by Ukraine, adopted by GRETA at its 53rd meeting (24-28 March 2025), as well as the comments of the Ukrainian Government received on 7 May 2025;

Bearing in mind the focus of the third evaluation round of the Convention on access to justice and effective remedies for victims of trafficking;

Considering the conclusions and proposals contained in Appendix I of GRETA's third report on topics related to the third evaluation round and follow-up topics specific to Ukraine;

Welcoming the measures taken and progress achieved by the Ukrainian authorities in implementing the Convention, and in particular:

- the further development of the legislative framework relevant to combating trafficking in human beings, including amendments to the Criminal Code and the inclusion of victims of human trafficking amongst the beneficiaries of free legal assistance;

- the adoption of the State Targeted Social Programme for Combating Trafficking in Human Beings for 2023-2025 and the increase in the state funding allocated for its implementation;
  - the efforts made to develop the training and specialisation of professionals to deal with trafficking in human beings;
  - the steps taken with a view to improving victims' access to psychological assistance and enabling victims of human trafficking to find employment;
  - the efforts made to strengthen international co-operation with a view to preventing and combating human trafficking;
- A. Recommends that the Government of Ukraine take measures to address the following issues for immediate action<sup>1</sup> identified in GRETA's report:
1. set up a state compensation scheme accessible to victims of human trafficking, regardless of their citizenship and residence status (paragraph 85);
  2. guarantee effective access to compensation for victims of trafficking, notably by:
    - ensuring that victims are provided with legal assistance and free legal aid from the early stage of the criminal proceedings in order to exercise their right to compensation;
    - ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain from the exploitation of the victim, is part of the criminal investigation, with a view to supporting compensation claims in court;
    - making full use of the legislation on the freezing and confiscation of assets to secure compensation to victims of trafficking and ensure effective enforcement of compensation orders;
    - ensuring that victims of trafficking can effectively receive compensation for the full damage suffered as part of the criminal proceedings, within a reasonable time;
    - building the capacity of legal practitioners to support victims to claim compensation and including compensation into existing training programmes for law enforcement officials, prosecutors, the judiciary and staff of victim support services (paragraph 86);
  3. take measures to ensure compliance with the principle of non-punishment of victims of trafficking for their involvement in unlawful activities, including administrative offences, to the extent that they were compelled to do so, as contained in Article 26 of the Convention. Such measures should include the adoption of a specific legal provision and/or the development of guidance for police officers, prosecutors and judges on the scope of the non-punishment provision (paragraph 118);
  4. make further efforts to ensure child-friendly proceedings in human trafficking cases, in line with the Guidelines of the Committee of Ministers of the Council of Europe on child-friendly justice. This should include measures to:
    - systematically prevent contacts between child victims and defendants, avoid repeated interviews of children to prevent traumatising and revictimisation, ensure that interviews with child victims and witnesses are recorded and used in court, and avoid the cross-examination (direct confrontation) with the accused;
    - adopt legislation on child-friendly justice;
    - provide practical guidelines and training to investigators, prosecutors, judges and lawyers on how to conduct child-friendly interviews (paragraph 156);

<sup>1</sup> The number of the paragraph setting out GRETA's proposals in the report is indicated in brackets.

5. take additional measures to effectively prevent, detect and combat trafficking for the purpose of labour exploitation, taking into account Recommendation CM/Rec(2022)21 of the Committee of Ministers and GRETA's Guidance Note on combating trafficking for labour exploitation. This should include:
  - reviewing the mandate of labour inspectors and reinforcing their human resources so that they can conduct operational activities and unannounced inspections in all economic sectors without prior complaints from workers or other evidence of suspected offences;
  - including labour inspectors among the actors responsible for the implementation of the National Mechanism for Interaction of Agents for Combating Trafficking in Human Beings (NMI), in particular in the identification of victims of trafficking for the purpose of labour exploitation, and ensure that they have the necessary training, human and financial resources to carry out this task efficiently;
  - establishing safe reporting and effective complaint mechanisms for workers, to ensure that victims of abuses or exploitative situations can refer their case without fear of repercussions;
  - reintroducing licensing of recruitment agencies for employment abroad and carrying out monitoring of their work, including their respect of the national legislation and international standards (such as ILO General principles and operational guidelines for fair recruitment and definition of recruitment fees) (paragraph 184);
6. improve the identification of, and assistance to, child victims of trafficking, in particular by:
  - increasing the capacity to detect child victims of trafficking by training a larger range of professionals who may come into contact with children in the use of trafficking indicators and involving child specialists in the identification of child victims of trafficking to ensure that the best interests of the child is the primary consideration;
  - further developing the training and resources of law enforcement officers and public prosecutors on the identification of child victims of trafficking, including child victims of trafficking recruited and/or exploited online;
  - providing safe and specialised accommodations for child victims of trafficking, with professionals adequately trained in supporting child victims of trafficking (paragraph 194).
7. ensure that all presumed and identified victims of trafficking receive adequate assistance and support, according to their needs. This should include measures to:
  - provide a sufficient number of places around the country for all victims of trafficking who need safe accommodation, which are adapted to the specific needs and provide specialised support and services;
  - ensure adequate funding and staff to work with victims of trafficking and facilitate the reintegration of victims of trafficking into society by providing them with vocational training and access to the labour market;
  - set up agreements/contracts on providing specialist assistance to victims of trafficking with specialised NGOs through public tenders and other relevant transparent procedures;
  - ensure adequate funding of assistance to victims of trafficking when it is delegated to NGOs as service providers;
  - guarantee access to health care to victims of trafficking (paragraph 211).
8. ensure that the recovery and reflection period, as provided for in Article 13 of the Convention, is specifically defined in law and that all the measures of protection and assistance envisaged in Article 12, paragraphs 1 and 2, of the Convention are made available during this period to persons with regard to whom there are reasonable grounds to believe that they are victims of trafficking. The authorities should take into account GRETA's Guidance Note on the recovery and reflection period (paragraph 213);

- B. Recommends that the **Ukrainian** authorities take measures to implement the other proposals for action listed in Appendix 1 of GRETA's third evaluation report;
- C. Requests the Ukrainian Government to report to the Committee of the Parties on the measures taken to comply with this recommendation by **20 June 2027**;
- D. Invites the Ukrainian Government to continue the dialogue in progress with GRETA and to keep GRETA regularly informed of the measures taken in response to GRETA's conclusions.