



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

**Recommendation CP/Rec(2025)05
on the implementation of the Council of Europe Convention
on Action against Trafficking in Human Beings
by Croatia**

*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 Croatia on 5 September 2007;

Having examined the fourth report concerning the implementation of the Convention by Croatia, adopted by GRETA at its 53rd meeting (24-28 March 2025), as well as the comments of the Croatian Government received on 19 May 2025;

Bearing in mind the focus of the fourth evaluation round of the Convention on vulnerabilities to human trafficking and measures taken to prevent them, detect and support vulnerable victims, and punish the offenders, as well as the additional focus on the use of information and communication technology (ICT);

Considering the conclusions and proposals for action contained in Appendix 2 of GRETA's fourth report on Croatia related to the thematic focus of the fourth evaluation round and follow-up topics specific to Croatia;

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

- the further development of the legislative framework related to combating trafficking in human beings, including amendments to the Criminal Procedure Act expanding the protective measures available to victims of trafficking and to the Social Welfare Act;

- the adoption of the National Plan for Combating Trafficking in Human Beings for the period 2024-2030 and the accompanying Action Plan for 2024-2026, which place a particular emphasis on preventing online trafficking and providing information on trafficking to migrants and other vulnerable groups;
- the legislative and policy developments aimed at providing greater protection and guarantees against exploitation to migrant workers;
- the provision of training programmes on trafficking in human beings to various professionals;
- the efforts made to raise awareness among school children and teachers about online safety and prevent risks of ICT-facilitated trafficking.

A. Recommends that the Government of Croatia take measures to address the following issues for urgent action¹ identified in GRETA's report:

1. take measures to prevent asylum seekers from becoming victims of trafficking, in particular by:
 - putting in place procedures for screening of asylum seekers for vulnerabilities throughout the country, including at border crossing points;
 - providing training on trafficking in human beings to border and local police officers, as well as other relevant officials, with a focus on vulnerabilities that lead to human trafficking and on early detection of cases of trafficking among asylum seekers (paragraph 77);
2. take steps to improve the identification of victims of trafficking, including by:
 - proactively identifying victims of trafficking in human beings in the Roma community and among foreign workers;
 - ensuring that a vulnerability assessment is systematically carried out in respect of all asylum seekers and that it includes the detection of possible indicators of trafficking in human beings;
 - ensuring that a proper procedure is in place for the identification of victims of trafficking among irregular migrants and asylum seekers, including by duly conducting individualised risk assessments prior to any forced return and assessing the risks of trafficking or re-trafficking on return. In this context, full consideration should be given to the UNHCR's Guidelines on the application of the Refugees Convention to trafficked persons and GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection;
 - ensuring that decisions to revoke the status of a victim fully take into account the particular circumstances of each case and the best interests of the child, where applicable (paragraph 111);
3. take steps to improve the provision of assistance to victims of trafficking in human beings, in particular by:
 - ensuring that victims are fully informed of the benefits of assistance before they are asked to consent to be included in the assistance programme and that information is provided in a manner that takes into account victims' age, maturity, intellectual and emotional capacity, literacy and any mental, physical, or other disabilities which may affect their ability to understand the information provided;

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

- ensuring that the assistance programme for victims of trafficking addresses the specific needs of individuals with physical, mental, intellectual or sensory impairments, and other marginalized groups, such as the LGBTI community;
 - ensuring increased involvement of specialised NGOs which are part of mobile teams in the provision of assistance to victims of trafficking and providing them with sufficient funding in order to carry out these activities;
 - ensuring that child victims of trafficking are placed in appropriate accommodation and provided with specialised assistance tailored to their needs;
 - securing a sufficient number of places for adult victims of trafficking in specialised shelters and ensuring that access to the shelters is provided without discrimination (paragraph 126);
4. make efforts to guarantee effective access to compensation for victims of human trafficking, including by:
- ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain from the exploitation of the victim and the financial loss for the victims, is part of the criminal investigation, with a view to supporting compensation claims in court;
 - enabling victims of trafficking to effectively exercise their right to compensation, by ensuring access to legal assistance and free legal aid at the outset of the criminal proceedings, and building the capacity of legal practitioners to support victims in claiming compensation;
 - including compensation in training programmes for prosecutors and the judiciary, and encouraging them to use all the possibilities the law offers to uphold compensation claims by victims of trafficking;
 - reviewing the eligibility criteria for state compensation, in particular the criterion of serious injury, ensuring that co-operation of the victim with law enforcement does not influence the award of compensation, and making state compensation available to all victims of trafficking when the offence was committed in Croatia, regardless of their nationality and residence status (paragraph 171);
5. ensure compliance with Article 26 of the Convention through the adoption of a provision on the 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, and/or the development of guidance for prosecutors. Public prosecutors should be encouraged to be proactive in establishing whether an accused person is a potential victim of trafficking and to consider trafficking in human beings as a serious violation of the rights of the victim. While the identification procedure is ongoing, potential victims of trafficking should not be punished for immigration-related offences and persons forced into prostitution should not be subjected to penalties (paragraph 176);
- B. Bearing in mind GRETA's conclusions that certain recommendations made repeatedly in preceding evaluation rounds have not been implemented or have been only partially implemented, requests the Croatian authorities to take steps to implement the recommendations in points 2, 4 and 5 as a matter of priority;
- C. Recommends that the Croatian authorities take measures to implement the other proposals for action listed in Appendix 2 of GRETA's fourth evaluation report;
- D. Requests the Croatian Government to report to the Committee of the Parties on the measures taken to comply with this recommendation **by 20 June 2027**;
- E. Invites the Croatian 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.