



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

Recommendation CP/Rec(2025)10
on the implementation of the Council of Europe Convention
on Action against Trafficking in Human Beings
by Denmark

*adopted at the 37th meeting of the Committee of the Parties
on 18 December 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 Denmark on 19 September 2007;

Having examined the fourth report concerning the implementation of the Convention by Denmark, adopted by GRETA at its 54th meeting (30 June - 4 July 2025), as well as the comments of the Danish Government received on 24 October 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 Denmark related to the thematic focus of the fourth evaluation round and follow-up topics specific to Denmark;

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

- the further development of the legislative framework relevant for combating trafficking in human beings, including amendments to the Criminal Code and the adoption of a new Children's Act;
- the adoption of the 6th National Action Plan for Combating Trafficking in Human Beings for the period 2022-2025, which is supported by increased funding for outreach activities by specialised non-governmental organisations providing support to potential victims of human trafficking;

- the attention paid to preventing the exploitation of migrant workers, including through the setting up of an Inter-Ministerial Working Group and the adoption of new legislation;
- the establishment in 2022 of the National Special Crime Unit to strengthen the investigation and prosecution of complex economic and organised crime cases, including human trafficking, and the designation of the South Jutland Police District as the body responsible for national monitoring efforts regarding human trafficking;
- the efforts made to raise awareness of the risks of technology-facilitated trafficking and to develop and use IT tools to detect indicators of human trafficking.

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

1. take steps to:
 - address the issue of unaccompanied children disappearing from reception facilities by providing them with a safe environment and living conditions that meet their needs and vulnerabilities and offer effective protection;
 - relocate the centre for unaccompanied children outside the Sandholm reception centre to provide a safer and more protective environment;
 - raise awareness among unaccompanied children regarding their rights and the risks of human trafficking (including recruitment and abuse through Internet/social networks) (paragraph 40);
2. ensure that persons whom the authorities have reasonable grounds to believe to be victims of trafficking are not expelled from Denmark until the identification process has been completed, in compliance with Article 13 of the Convention, and are transferred to appropriate accommodation, in line with Article 12 of the Convention (paragraph 63);
3. step up efforts to identify victims of trafficking for different forms of exploitation, in particular among third-country nationals who might be staying irregularly in Denmark as a direct consequence of having been trafficked, including by:
 - improving the proactive detection and identification of victims of human trafficking, including within the Ellebæk detention centre and throughout the asylum procedure. This should include strengthening efforts to create an atmosphere of trust during interviews, thereby encouraging victims to share their trafficking experiences;
 - abandoning the concept of "currently trafficked", and ensure that all victims of trafficking are identified as such and have access to the measures included in Articles 12, 13, 14, 15, 16, 26 and 28 of the Convention (paragraph 101);
4. take steps to improve identification and assistance of child victims of trafficking, in particular:
 - make further efforts to improve the identification of child victims of trafficking, especially amongst unaccompanied children;
 - ensure that staff from social services are systematically trained and sensitised to identify child victims of trafficking and adopt a harmonised approach across the country;
 - train all professionals working with child victims of trafficking to recognise and respond appropriately to their needs (paragraph 123);

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

5. review the legislation in order to ensure that all persons for whom there are reasonable grounds to believe that they are victims of trafficking are provided with a recovery and reflection period, in line with Article 13 of the Convention, rather than a time limit to prepare their departure from the country as irregular migrants. The recovery and reflection period should be granted to victims of trafficking unconditionally, regardless of whether they have co-operated with the authorities and should include at least assistance referred to in Article 12, paragraphs 1 and 2, of the Convention (paragraph 168);
6. take steps regarding granting of residence permits, in particular:
 - review the application of the system for granting residence permits to victims of trafficking with a view to ensuring that the victim-centred approach which underpins the Convention is fully applied and in order to prevent re-trafficking;
 - give full consideration to the UNHCR's guidelines on the application of the Refugees Convention to trafficked people, including their possible entitlement to asylum when deciding upon applications for asylum of persons who are at risk of being re-trafficked or otherwise persecuted should they be obliged to return to their State of origin or residence. In this context, reference is made to GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection (paragraph 173);
7. take steps to facilitate and guarantee access to compensation, and in particular to:
 - simplify, to the extent possible, the procedures for applying for compensation in court and ensure that compensation awarded is effectively paid;
 - facilitate access to state compensation by reviewing the eligibility criteria, ensuring that victims' information is accurately collected to enable the proper transfer of compensation;
 - grant residence permits to victims of human trafficking for the duration of the legal proceedings, including compensation proceedings, with a view to facilitating access to compensation and redress;
 - make full use of the legislation on the freezing and forfeiture of assets to secure compensation to victims of human trafficking (paragraph 182);
8. ensure compliance with Article 26 of the Convention through further developing the existing guidance and promoting its application, in particular by:
 - encouraging prosecutors to be proactive in establishing whether an accused person is a potential victim of trafficking, and to consider that, having been trafficked, the culpability of the victim may be diminished, or even removed entirely;
 - lifting all negative consequences faced by presumed victims of trafficking in human beings, such as any form of detention, entry bans or delays in accessing legal residence in Denmark - including cases where victim status is recognised only after deportation - and ensuring the effective implementation of existing legislation so that victims can obtain compensation for time spent in detention due to failure to be recognised as victims, and for the failure to apply the non-punishment provision;
 - taking steps to ensure that the non-punishment provision is capable of being applied to all offences that victims of human trafficking were compelled to commit (paragraph 188);
9. ensure compliance with Article 16 of the Convention by:
 - putting in place repatriation assistance arrangements suitable for all victims of trafficking, with due regard for the rights, safety and dignity of the person concerned and the state of judicial proceedings, and encompassing protection against reprisals and/or against re-trafficking;

- prior to deciding on the return of victims, carrying out comprehensive assessments of the risk of them being re-victimised and re-trafficked; there should be possibilities to stay in Denmark if there are no guarantees that the return would comply with the principle of non-refoulement;
- further strengthening co-operation with the countries to which victims of human trafficking return, with a view to improving their protection, reintegration and rehabilitation (paragraph 199);

B. Bearing in mind GRETA's conclusions that some recommendations made repeatedly in preceding evaluation rounds have not been implemented or have been only partially implemented, requests the Danish authorities to take steps to implement the recommendations in points 3, 4 and 5 as a matter of priority;

C. Recommends that the Danish authorities take measures to implement the other proposals for action listed in Appendix 2 of GRETA's fourth evaluation report;

D. Requests the Danish Government to report to the Committee of the Parties on the measures taken to comply with this recommendation by 18 December 2027;

E. Invites the Danish 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.