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G R E T A

Group of Experts on Action
against Trafficking in Human Beings

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Reply by the Netherlands to the Questionnaire for the evaluation of the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by the Parties

Fourth evaluation round

Thematic focus: Addressing vulnerabilities to trafficking in human beings

Reply submitted on 15 September 2026

Introduction

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 of the Convention 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 of trafficking, 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 the vulnerability of children to trafficking. The third evaluation round focused on trafficking victims' access to justice and effective remedies.

GRETA has decided that the fourth evaluation round of the Convention will focus on vulnerabilities to human trafficking and measures taken by States Parties to prevent them, detect and support vulnerable victims, and punish the offenders. This includes a focus on the use of information and communication technology (ICT), which brings structural changes to the way offenders operate and exacerbates existing vulnerabilities.[1]

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.[2] Vulnerability to human trafficking is also subject to intersectional factors, such as gender, belonging to a minority group and socio-economic status.

Applying a socio-ecological approach to the analysis of vulnerability to human trafficking demonstrates how different risk factors influence vulnerability, and how protective factors may reduce the risk of victimisation by increasing resilience.[3] The socio-ecological model considers the complex interplay between individual, relationship, community and societal factors. It helps to understand how anti-trafficking strategies should: (a) reduce the vulnerability of individuals, (b) work with the communities

[1] Paolo Campana, Online and Technology-Facilitated Trafficking in Human Beings, Council of Europe, April 2022.

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

[3] https://www.avoiceforcentraloregon.com/uploads/1/3/9/9/139904528/socio_ecological_model_and_trafficking.pdf

(which may also include relationships) concerned to ensure that their practices or current dynamics do not exacerbate or contribute to vulnerabilities to human trafficking and, (c) change a number of system-driven or structural elements (such as policies) so that they do not facilitate but discourage an environment conducive to human trafficking.

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.

States Parties are requested to transmit to GRETA a reply to this questionnaire within four months from the date it was sent. The reply to the questionnaire should be submitted in one of the official languages of the Council of Europe (English and French), and preferably also in the original language. Where appropriate, in order to avoid unnecessary repetition, the reply may refer to information contained in the report submitted by the national authorities on measures taken to comply with the Committee of the Parties' recommendation concerning the implementation of the proposals made in GRETA's third evaluation report. States Parties should provide links, copies or extracts of relevant legislation, regulations, national action plans and case law mentioned in the reply to the questionnaire, in the original language and, wherever possible, also in one of the official languages of the Council of Europe.

A variety of stakeholders and civil society representatives should be effectively consulted in the preparation of the reply to the questionnaire, to ensure that the information provided is as comprehensive as possible.

Part 1 – Addressing vulnerabilities to trafficking in human beings

I. PREVENTION (Articles 5, 6 and 7)

1. Do you have specific data/research/analysis of what makes people vulnerable to trafficking in human beings (THB) in your country? Please provide information on the categories/groups of people identified as being at risk of becoming victims of human trafficking, and how they are addressed in the national anti-trafficking strategy and/or action plan. Have you identified geographical regions or economic sectors in your country as particularly vulnerable to THB, and how do you address them in your strategy or policy?

Ministry of Social Affairs and Employment
The combination of labour vulnerability and harsh competition on the price of labour can create incentives to abuse and exploit workers in the Dutch labour market, despite coordinated efforts to resolve these problems. A technical exploration of a possible sectoral ban on temporary employment and mandatory percentage of permanent hiring shows that the meat, cleaning, transport, and agriculture sectors have been found to have a relatively high risk of violating labour laws, especially with migrant workers. In the meat sector, where systemic abuses are evident and no improvement is seen, we are preparing a possible ban on contracting temporary staffing agencies to recruit temporary workers. With the other three sectors (cleaning, transport, and agriculture), discussions with stakeholders are being held about what they can implement to combat abuses. Violations are not as widespread throughout the whole sector in these three sectors. Therefore, research is now being conducted to identify where the risks of violations are greatest within these three sectors. Most of the violations constitute adequate payment and workplace safety issues. However, very severe cases involving intimidation and (the threat of) violence can hint on human trafficking. These cases are taken very seriously and resolved in cooperation with police and other applicable law enforcement.

National Labor Authority:
The law states that children up to and including 12 years of age are not permitted to work in the Netherlands. This is a blanket ban: the prohibition on child labor. An exemption from this ban is possible in the case of cultural work (artistic labor). This applies to work in online audiovisual productions with a clear commercial nature, such as promoting products or participating in scripted videos. In 2025, the Labor Inspectorate issued a follow-up notice to kidfluencers: https://www.nlarbeidsinspectie.nl/documenten/2025/07/08/signaal-kidfluencers-vervolg

In addition to kidfluencers, the Labor Inspectorate also draws attention to other productions, such as mom and dad influencers and family vloggers, in which children frequently appear on screen.

National Action Plan
Underage victims are known to be potentially extremely vulnerable to human trafficking. In order to strengthen the position of underage victims of human trafficking a greater insight into victims is required. Figures from Comensha and reports by the National Rapporteur on human trafficking and Sexual Violence against Children show that the vast majority of victims are currently invisible and therefore do not receive the necessary help and protection. Within the Action plan a specific action focuses on strengthening the position of underage victims. This action line aims to provide practical tools for improving the identification, protection, and support of minor victims of human trafficking. Defence for Children-ECPAT, the Red Cross, and FIER are the action holders of this action line.

Dutch National Rapporteur on Human Trafficking
Recent national figures indicate distinct vulnerability patterns for trafficking in human beings in the Netherlands. Reports involving minors have risen, particularly in the context of criminal exploitation, including instances where youths are induced to make bank cards available for criminal purposes,

place explosive devices, or transport and sell drugs. The National Rapporteur assesses that the true number is likely higher and underscores the importance of timely identification. At the same time, organisations such as COA, Nidos, municipalities, care providers and the police are increasingly signalling concerns about the criminal exploitation of unaccompanied minor foreign nationals in reception. These concerns have not yet been reflected in registrations, which may indicate under-detection. In 2024, Ukrainians more frequently came into view as presumed victims, predominantly of labour exploitation. Their vulnerability is linked to displacement due to the ongoing war and uncertainty about prospects in the Netherlands. Although this is a serious development, the fact that these victims are coming into view makes it possible to implement targeted interventions addressing their specific vulnerabilities. In addition, Latin American victims are disproportionately represented in victims of sexual exploitation, including in hotels and holiday homes. This pattern is partly associated with a carousel modus operandi, in which victims are relocated every few days or weeks within the Netherlands or across Europe, with accommodation and work arranged via booking platforms or at holiday parks.[4] Presumed victims of labour exploitation are often detected in service providers, construction, transport/distribution, hospitality industry, agriculture, industry and domestic service.[5] Minors remain vulnerable to sexual exploitation, especially minors in a vulnerable situation. The traffickers operate underground and victims are often hard to reach. Children in youth institution are particularly vulnerable.[6]

In 2025 the Dutch National Rapporteur published an extensive study on the backgrounds of sex traffickers. [7] This research is the first to map out the offending trajectories of domestic sex traffickers, as well as their backgrounds and personal situations. It shows that domestic sex traffickers are not specialists, but generalists. The offence of human trafficking fits a broader criminal career. However, at least 18% does commit the serious offence of human trafficking more than once, which is about a quarter of those who reoffend after human trafficking with any crime. Still, a typical domestic sex trafficker does not exist: there are four groups of offenders with different criminal careers. Many offenders come from a vulnerable background, such as an unstable family situation growing up, poor school performance and criminal individuals in their direct social environment.[8] They also score higher on intellectual disabilities and victimhood of other crimes.[9] These are risk factors for committing offences. For offenders of domestic sex trafficking, these factors appear to be significantly more prevalent. Not only compared to non-offenders, but also when compared to general offenders. This means that early intervention among youths with a high risk profile and maximum efforts to aid offenders results in opportunities to prevent (repeat) offences. And thus to prevent an estimated 700 to 1,000 victims of domestic sex trafficking in the Netherlands annually, of which a fifth to a third are minors.

Comensha

[4] National Rapporteur on Trafficking in Human Beings and Sexual Violence Against Children, Annual Figures on Trafficking 2024.
[5] Nationaal Rapporteur Mensenhandel en Seksueel Geweld tegen Kinderen (2024). Monitor mensenhandel 2019-2023. Nationaal Rapporteur, p. 49.
[6] Nationaal Rapporteur Mensenhandel en Seksueel Geweld tegen Kinderen (2024). Monitor mensenhandel 2019-2023. Nationaal Rapporteur, p.39-76.
[7] Relevant publications on: Brede blik op daderschap - achtergronden van daders van binnenlandse seksuele uitbuiting | Nationaal Rapporteur
[8] Nationaal Rapporteur Mensenhandel en Seksueel Geweld tegen Kinderen (2024). Brede blik op daderschap. Achtergronden van daders van binnenlandse seksuele uitbuiting. Nationaal Rapporteur.
[9] Nationaal Rapporteur Mensenhandel en Seksueel Geweld tegen Kinderen (2024). Daders van binnenlandse seksuele uitbuiting: licht verstandelijke beperking en slachtofferschap. Aanvullende publicatie op Brede blik op daderschap. Nationaal Rapporteur. Also: Rapport Uitbuiting & LVB: knelpunten en aanbevelingen voor een effectievere aanpak: Comensha, Koraal and Meta Story, 2023.

Comensha is the national coordination centre against human trafficking in the Netherlands. It collects and analyses data on victims of trafficking, including for the benefit of the Dutch National Rapporteur on Trafficking in Human Beings and Sexual Violence against Children. Reliable data on victims of trafficking are essential for an effective anti-trafficking response. Developing, evaluating, and improving policies requires insight into, among other things, the number of victims, their age, country of origin, residence status and the forms of exploitation they have experienced. In practice, however, organisations are often reluctant to share data with Comensha due to uncertainty regarding the application of privacy legislation. As a result, victims who are known to support organisations or care providers are not always included in the national registration system. In the last year, the number of notifications that could not be incorporated into Comensha's registration figures increased because the minimum necessary information was not consistently shared. This is concerning, as a comprehensive understanding of victimisation is essential for an effective response. Incomplete registration hampers the ability to identify trends, understand vulnerabilities and develop evidence-based policies. Improving data collection and ensuring legal certainty regarding data sharing are therefore essential elements of an effective victim-centred approach to trafficking in human beings. Efforts are currently underway to introduce an explicit legal basis for the registration of victims of trafficking in human beings by Comensha. The aim is to provide greater legal certainty and clarity for all relevant stakeholders who come into contact with presumed victims, thereby facilitating the lawful sharing of essential information with Comensha and strengthening the national evidence base on trafficking in human beings.

Next to the registration issues, Comensha is also reporting groups of trafficking victims who remain largely hidden and are consequently underrepresented in Comensha's registrations. Comensha reports a limited visibility of child victims in its registration data, which is not to be interpreted as evidence that trafficking affecting children is limited in scale. On the contrary, signals received by Comensha from practitioners indicate that many child victims remain unidentified and outside existing registration systems. Other hidden groups of victims include, but are not limited to, boys who are victims of trafficking, children who are sexually exploited by their parents, and unaccompanied asylum-seeking children. Moreover, persons working as domestic workers, live-in carers and au pairs may face heightened risks of labour exploitation due to their dependency on private households and the isolated nature of their work.

Comensha's most recent figures show that the majority of female victims (401; 68%) experienced sexual exploitation. In addition, 122 women (21%) were subjected to labour exploitation and exploitation in services, while 61 women (10%) were victims of forced criminality. Among male victims, the majority (279; 67%) experienced labour exploitation and exploitation in services. A further 81 men (19%) were subjected to forced criminality and 58 men (14%) to sexual exploitation.

2. What specific measures are taken to reduce children's vulnerability to THB by creating a protective environment for children? Please provide information in the following areas:

a. protecting children's rights from attitudes, customs, behaviour and practices that can have an adverse effect (including child, early and forced marriage, and illegal adoption);

Ministry of Justice and Security and Ministry of Foreign Affairs

Exploitation in the context of marriage is already a criminal offense under Article 273f of the Penal Code (Sr). With the implementation of the revised EU Directive on human trafficking, marital exploitation is explicitly criminalized in Article 273f of the Penal Code. If someone is in a (religious) marriage against their will, this constitutes marital captivity. Exploitation need not be present in such cases, meaning this cannot be classified as human trafficking.

Marital captivity has been a criminal offense since July 1, 2013. Since July 1, 2023, civil law measures have come into effect to make religious divorce easier under the Act on Combating Marital Imprisonment. This means that—even without a partner's consent—a divorce can be enforced by a court.

Combating both of these phenomena is important, and active efforts are being made in this regard. For example, the Ministry of Foreign Affairs provides consular assistance to victims of forced marriage, marital captivity, and abandonment abroad. To this end, it works closely with the National Center for Forced Marriage and Abandonment (LKHA), a knowledge and expertise center for forced marriage and abandonment where professionals and victims can turn for advice and assistance. The Ministry of Foreign Affairs also disseminates information about forced marriage and abandonment through of an online campaign during the summer vacations (2024 and 2025). This campaing will also be held in the summer of 2026. Through a social media campaign at Schiphol Airport, potential victims were informed about the assistance the Ministry of Foreign Affairs can provide abroad. This has proven to be a successful way to reach this target group. In addition, the Ministry of Social Affairs and Employment is organizing a poster campaign at Schiphol Airport this year during the summer vacation, targeting (potential) victims of forced marriage, abandonment, female genital mutilation, and human trafficking. Improving the identification of victims is also important at Dutch diplomatic missions. The training program for consular staff working at these diplomatic missions includes a specific module on forced marriage and abandonment. In addition, clear and accessible assistance and contact information is available on the NederlandWereldWijd website for victims of forced marriage and abandonment[10].

Action Plan Together Against Human Trafficking

Action Line 6 of the Action Plan for the "Together Against Human Trafficking" Program focuses on strengthening the position of minor victims.The goal of Action Line 6 is to provide practical guidance for improving the identification, protection, and support of minor victims of human trafficking. Defence for Children-ECPAT, the Red Cross, and FIER are the lead organizations for this action line.

In addition to desk research, dozens of interviews were conducted with knowledge centers, municipalities, healthcare organizations, and educational institutions to compile an overview of organizations dedicated to protecting minors from sexual and criminal exploitation. Over the coming months, areas for improvement in the identification, reporting, and assistance processes will be reviewed with victims, survivors, and experts.

In addition, we are exploring how to better align victim assistance with their rights and needs. To this end, we have gathered input from experts by experience and case studies, which will be used to improve training programs on identifying victims and providing them with assistance. Experts by experience will be further involved in the coming months to provide advice on implementation processes and policy.

b. developing children's life skills (including media literacy and online safety skills), knowledge and participation;

Ministry of Interior and Kingdom Relations

The government aims to ensure that children's digital environment becomes safer and that their rights are safeguarded and strengthened.

The government has identified five overarching challenges that require a more focused policy approach and a long-term strategy with regard to the online child rights strategy:

[10] Home | NederlandWereldwijd

- Legislation, enforcement, and compliance

There is a need for clear, enforceable rules that require digital services to actively protect children. Effective enforcement of existing legislation is also crucial. To strengthen legislation, enforcement, and compliance, our administration is committed to the following concrete actions:

- Effective enforcement of the Digital Services Act and the further development of measures addressing addictive and polarizing design in the upcoming Digital Fairness Act (DFA);
- As part of the DFA, efforts are also being made to promote more comprehensive European regulation of the gaming sector
- At the national level, new laws and regulations are being enacted to regulate online child labor (kidfluencing, children in family vlogs, and mom- and dadfluencers) so that abuses in this area can be better addressed.
- We are also working to establish robust and targeted oversight. Responsibility for independent oversight bodies lies with the relevant line departments. The Ministry of the Interior and Kingdom Relations will identify relevant issues and, if necessary, bring them to the attention of the relevant parties.
- We are also holding discussions with (very large) online platforms regarding their responsibilities for protecting minors and how they can operate more transparently in this regard.
- In addition, we are exploring safe, inclusive, privacy-friendly, and feasible methods of age verification.
- The Ministry of Finance is currently working on the implementation of the revised European Consumer Credit Directive (CCDII). The draft implementation proposal reflects the widely supported political and societal desire to prevent young people from using Buy Now, Pay Later (BNPL) services. The implementing legislation includes a ban on providing BNPL credit to individuals under the age of 18, and the law requires BNPL companies to verify the age of consumers.

- Better equipping parents and caregivers

  To better equip parents and other caregivers with the skills needed for digital parenting, we are focusing on a combination of communication, education, tools, and collaboration with various stakeholders. This is being done by the following:

  - A public awareness campaign on digital literacy, aimed at raising awareness of both the opportunities and risks of digital services and providing practical guidance.
  - We work closely with Netwerk Mediawijsheid, which reaches parents and caregivers through its affiliated partners. Together with them, we are exploring what additional information needs exist and how best to address them. As part of the public awareness campaign, Netwerk Mediawijsheid is also developing a new landing page specifically for parents, featuring practical tips, personal stories, and accessible information on digital parenting.
  - The Children's Rights Impact Assessment (KIA) is also used as a tool to engage with the industry in discussions about the risks and opportunities of specific digital services for children's rights. KIAs have been applied to the social media platforms Instagram, Snapchat, and TikTok and will be expanded to streaming services and gaming platforms.
  - Youth professionals, such as social workers, teachers, youth workers, and sports coaches, are also actively involved. As co-educators, they play an important role. The Ministry of Health, Welfare and Sport has therefore developed advisory guidelines for healthy and responsible screen and social media use.

- Education as the foundation for digital resilience

Digital literacy deserves a structural and comprehensive place within education, not only from a technical perspective, but also from pedagogical and ethical ones. Schools play a key role in strengthening the digital resilience of children and young people. This requires careful curriculum development and close collaboration between educational institutions, governments, businesses, and civil society organizations. In addition, clear frameworks are needed for the responsible use of artificial intelligence (AI) in education, with a focus on autonomy, privacy, and equal opportunities. This is being done by the following:

- In the coming period, the curriculum revision for digital literacy in elementary school and in the early years of secondary (special) education will take place. The aim is to better align the curriculum with societal changes, including technological developments. The revision is structured around several domains including on practical knowledge and skills, such as digital systems, digital media and information, security and privacy, data, and AI. The other domain addresses the interaction between digital technology, people, and society, with a focus on reflection on one's own digital behaviour and its societal impact.
- In addition, since January 2024, the national "no, unless" policy has been in effect to ban smartphones and other devices from secondary school classrooms.
- Media literacy education remains an indispensable component of digital literacy and is of great importance for digital resilience. We remain committed to expanding its reach and promoting the development of effective teaching materials. The school library is closely involved in this process.

- Involving children, young people, and caregivers as partners

Children and young people are not only users of digital services, but also co-creators of the digital world. Their experiences, knowledge, and ideas are essential for effective and future-proof policies. That is why it is necessary to systematically involve young people in policy development, implementation, and evaluation. This is achieved through youth councils, co-creative development processes, and platforms where they engage in dialogue with policymakers, businesses, and civil society organizations. This is being done by the following:

- The Ministry of the Interior and Kingdom Relations' Youth Council on Digitalization, which focuses specifically on children's digital rights and digital resilience. We also prioritize co-creative development processes in which young people actively contribute ideas and help shape policies and solutions. This includes platforms where they engage in dialogue with policymakers and partners from various sectors.
- It is important that interventions aimed at strengthening digital resilience align with young people's (online) lives. Commissioned by the Ministry of Social Affairs and Employment, the pilot project "Strong Together Against Online Hate and Discrimination" has therefore been launched. This alliance—founded by Netwerk Mediawijsheid and Diversion—is working with young people to develop interventions to combat inappropriate online behavior and hate speech.
- We are exploring the possibilities of establishing an online Children's Rights Parent Council, in which parents and caregivers are systematically involved as stakeholders in policy development and implementation in this area.
- We are establishing a long-term monitoring program to gain a better understanding of media use and media education in families with children aged 7 to 12, building on the annual Iene Miene Media survey (ages 0–6). The goal is to identify trends and developments and to enable policymakers to respond effectively to the media use of this target group and the role parents play in it.

- In addition, we collaborate with organizations working in the field of children's online rights to identify early warning signs of harmful content and other risks in the digital environment of children and young people and to use this information to inform policy-making.

- Facilitate and strengthen collaboration among network partners

  The challenge of making children's digital environment safer and safeguarding and strengthening their rights also requires an appropriate division of roles and responsibilities among all societal partners, such as the networks, alliances, and coalitions that have been active for some time and have proven their worth.

  Following the recent strategy sessions, the Ministry of the Interior and Kingdom Relations will continue to bring network partners together on a regular basis. These meetings are aimed at pooling knowledge and expertise, strengthening mutual cooperation, and making the most of existing initiatives.

  To reinforce this network-oriented approach, and in particular to facilitate and strengthen cooperation, UNICEF is appointing a children's rights online facilitator.

  Finally, we will also continue to focus on international cooperation regarding the protection of children's rights online.

c. putting in place a system for monitoring and reporting cases of abuse;

The reporting code for domestic violence and child abuse helps professionals identify and respond to (suspected cases of) domestic violence or child abuse. This also includes psychological or sexual abuse and neglect. The 5 steps in the reporting protocol for domestic violence and child abuse[11] guide professionals from the moment they identify a situation until they decide whether or not to file a report with Veilig Thuis[12]. The 5 steps are:

- Identify warning signs using the warning signs checklist. The Child Check is part of this step and is designed to help professionals recognize child abuse by adult clients at an early stage.
- Consult with a colleague or, if necessary, with Veilig Thuis: the advice and reporting center for domestic violence and child abuse.
- Engaging in a conversation with the person(s) involved to discuss concerns.
- Assessing the severity of the situation. If in doubt, Veilig Thuis can always be contacted.
- Making a decision. The decision-making framework in the reporting code helps the professional make a decision. For many professional groups, a specific decision-making framework is also available for their use.

In step 5 of the reporting protocol, professionals make a decision based on two questions:

- Is it (also) possible to provide or organize assistance?

Providing assistance is possible if:

- the professional is able to provide or organize appropriate assistance;
- those involved cooperate with the assistance provided or organized;
- the assistance leads to lasting safety.

- Is reporting to Veilig Thuis necessary?
  - Professionals report to Veilig Thuis if there is acute or structural danger. Or if providing assistance based on one of the above points is not possible.

[11] Meldcode huiselijk geweld en kindermishandeling | Augeo
[12] Het afwegingskader in de meldcode | Nederlands Jeugdinstituut

Thereby, it is always possible to ask for advice at Veilig Thuis, without officially reporting. The professionals of Veilig Thuis can advise the professionals about the best way of handling the situation. Veilig Thuis is the national advice and reporting center for domestic violence and child abuse. Professionals and citizens can always ask for advice or file a report with Veilig Thuis. Veilig Thuis will assess the case and takes the necessary steps to assure the safety of the victims.

The professional records all steps taken in a client file, patient file, student file, or another record-keeping system.

When professionals suspect child abuse, it is important to involve the children, talk to them and follow the reporting procedure. The website of the Netherlands Youth Institute offers tips on how professionals can best talk to children about suspected child abuse.[13]

Many professionals are bound by professional confidentiality and, in principle, are not permitted to disclose information about a client to others. In certain situations, an exception applies, such as in cases of (suspected) domestic violence or child abuse. In such cases, it is permitted to consult with others and file a report without the client's consent. This is permitted if the information is necessary to stop the domestic violence or child abuse, or to investigate a reasonable suspicion thereof. The professional must follow the step-by-step plan outlined in the reporting code. This exception is specifically mentioned in the reporting obligation regarding domestic violence and child abuse. The reporting obligation is set forth in Article 5.2.6 of the Social Support Act 2015.

Use of the reporting code is mandatory for certain professional groups. This is stipulated in the Decree on the Mandatory Reporting Code for Domestic Violence and Child Abuse. The reporting code applies to professionals working in the following sectors: health care, education, child care, social services, youth services and the justice system. Employers in the above-mentioned sectors must adopt and implement the reporting code. They must also promote its use and awareness among employees. The Domestic Violence and Child Abuse Reporting Code Toolkit contains tips and resources for professionals.[14]

d. providing training to child care professionals, legal guardians, education professionals;

Ministry of Education, Culture and Science

In addition, this fall we began organizing and conducting targeted training for teachers, school counselors, and special education coordinators. The Dutch Association of Designated Officers (LVAK) is carrying this out with a project grant, in collaboration with the special education partnerships. The main goal of these sessions is to increase knowledge of the Veilig Thuis reporting code.

It is important that teachers properly apply the reporting code for domestic violence and child abuse—and the assessment framework for education— and that schools have their policies in order. The government remains in consultation with the Professional Association for School Leaders and sector councils in primary and secondary education.

Ministry of Health, Welfare and Sport, Red Cross and Defence for Children

The free BUIT e-learning[15] course for professionals is an online training program designed for professionals who work with young people—whether in schools, on the streets, in healthcare, or

[13] Hoe praat ik met een kind over vermoedens van kindermishandeling? | Nederlands Jeugdinstituut
[14] Toolkit meldcode huiselijk geweld en kindermishandeling | Rijksoverheid.nl
[15] Home - BUIT voor professionals

anywhere else. It helps participants gain knowledge about the criminal and sexual exploitation of young people, recognize warning signs, understand what can be done about these signs, and identify which partners can be involved. To date, over 3,700 people have completed the training. Most participants are from youth care/youth protection services, municipalities, the migration sector, education, and social work.

The ”Jongeren zijn #GEENBUIT” campaign encourages professionals to take the free e-learning course “www.buitvoorprofessionals.nl” and has reached over 1 million people so far.

To date, 836 professionals have completed the comprehensive, in-depth training on human trafficking involving minors, including staff from municipalities, youth care services, child protection agencies, Veilig Thuis, the COA, NIDOS, and the police. There appears to be a significant need for professional development regarding human trafficking among staff in these sectors. Special attention is given to training programs designed to improve the identification of human trafficking among unaccompanied minor asylum seekers. 85% of staff in the asylum system who were trained this year indicated that they suspected their young clients were affected by this issue. In collaboration with the COA and Nidos, a warning signs checklist[16] has been developed, specifically addressing the exploitation of minor asylum seekers.

Since April of 2025, additional efforts have been made to raise awareness and identify human trafficking in schools (secondary education and secondary vocational education) under the banner “Exploitation (Not) at School.[17]” The program, consisting of a customized training course, a toolkit, and an updated warning signs guide, has been shared with schools and teachers. To date, more than 185 education professionals have registered for one of the training sessions.

Where possible, the project partners also provided input within the Action Plan on the development and implementation of other relevant action lines in order to incorporate the perspective of minor victims into those as well.

e. access to education and health care for vulnerable children, including from minority groups, unaccompanied migrant children, and children of migrant workers;

Ministry of Justice and Security

In 2012, the national program *Approach to Roma Exploitation* was launched by the Ministry of Justice and Security. The aim of this program was to prevent children from becoming victims of (forms of) exploitation by focusing on education and securing a position in the labor market. From the national program, which ended in 2016, the file *Approach to the Exploitation of Children with a Roma Background* was established, which the Dutch Center for Crime Prevention and Safety (CCV) has been implementing since 2017 on behalf of Ministry of Justice and Security. In the first few years, the activities were mainly focused on generating widely spread knowledge and tools about the target group and ensuring the continuity of the existing approach, so municipalities could continue with their local approach even after the program ended.

The knowledge and insights gained have been continuously developed and, in 2024, expanded to address criminal exploitation within closed family networks. This approach requires constant adaptation due to changing forms of crime (from criminal exploitation to other forms of human trafficking, such as sexual exploitation, forced marriage, and drug trafficking), societal context, and the closed nature of communities where values and behaviors are passed down intergenerationally.

[16] Signaalkaart Uitbuiting onder (alleenstaande) minderjarige asielzoekers (Rode Kruis) - Comensha
[17] Trainingsaanbod - Uitbuiting van leerlingen in het vo | Rode Kruis

Center for Crime Prevention and Safety: exploitation within Family Networks
Since 2017, the Center for Crime Prevention and Safety (CCV) has been carrying out the *Approach to the Exploitation within Family Networks* on behalf of the Ministry of Justice and Security.

The CCV has the following tasks:

- Stimulating and maintaining the national network at the policy and administrative level (National Platform and Strategic Council).
- Actively supporting municipalities and organizations with (support requests in) the approach to the exploitation of minors within family networks (Coaching on the Job).
  The support for Coaching on the Job focuses on professionals working with and around the following themes and target groups. Five forms of Coaching on the Job are distinguished, ranging from advice and consultation to long-term process guidance.
- Monitoring, developing, and sharing insights via the national platform as well as online and offline channels (Knowledge Development).
  Based on the input from the National Platform and coaching on the job, the insights from practice are recorded (web file) and disseminated through the *coaching on the job* activities. In 2026, the focus will be on enforcement and control, the hesitation to act of professionals, and the impact on the individual, with the aim of breaking the intergenerational transmission of criminal exploitation.

Ministry of Social Affairs and Employment

Access to education

Children of migrants (among which children that belong to minority groups, unaccompanied migrant children, and children of migrant workers) have access to education. Schools in primary and secondary education receive additional funding to organize education suited to the needs of these children. During the first two years of education in the Netherlands, the program for these children focuses on learning Dutch and getting used to the Dutch education system. This type of education is offered in smaller classes.

Access to health care

Healthcare providers always provide medically necessary care, regardless of whether someone is insured or not. In the case of migrant workers, they should be considered insured if they work in the Netherlands. Their children, if they live in the Netherlands, are then covered under the same insurance. This depends somewhat on their living situation in the Netherlands.

Access to youth services (jeugdhulp)

Within the youth sector, child abuse is addressed in a general manner. Access to youth services is enshrined in law under the Youth Act. Since decentralization in 2015, municipalities have been primarily responsible for the delivery of youth services. Access is typically arranged through the municipality or a family doctor.

Ministry of Asylum and Migration (in relation to unaccompanied migrant children)

Children in the asylum procedure, including unaccompanied minors, have the right to education and healthcare. Asylum seekers have access to medical care like the general practitioner, midwife or hospital visits and are offered nearly the same healthcare package as the basic package provided to all Dutch residents under the Health Insurance Act. Almost every asylum seekers' center has a health center where a general practitioner holds consultations. The general practitioner works together with a practice nurse, a mental health care specialist or a practice assistant.

Regarding education, All children in the Netherlands have the right to education, including children of asylum seekers. These children go to school as soon as possible after they arrived in the Netherlands, with a legal maximum of 3 months after arrival (with the EU Migration Pact, this maximum will change to 2 months starting from the 12th of June 2026). Municipalities are responsible for arranging a place in education for all children in asylum reception. For children under the age of 4, pre-school activities are sometimes available through partnerships with local childcare providers. However, access to these programs can vary depending on the location and capacity of the reception center.

f. birth registration for all children born in the country.

Ministry of Interior

In the Netherlands, birth registration is mandatory and must be completed within three business days of the birth at the municipality where the child was born. As a result, the child officially becomes a resident of the Netherlands and is assigned a citizen service number (BSN). This applies to all children, including undocumented children, who are entitled to the rights set forth in the Convention on the Rights of the Child in the same way as other children in the Netherlands. Undocumented children must also be registered in the Population Register (BRP) after their birth and are entitled to a name and nationality. Parents must present proof of identity, which may include a valid foreign identification document or a document proving that they are the child's parents. If an undocumented child is born in the Netherlands and a Dutch birth certificate has been issued, the child must be entered into the Population Register within six months.

In the Netherlands, birth registration involves monitoring for warning signs, such as exploitation. The Convention on the Rights of the Child requires the government to take action when children need protection, even if parents disagree. The Child Protection Board oversees the process and intervenes if a child's development or safety is threatened, for example by exploitation or other forms of child abuse. In addition, birth registration was originally intended as a means to combat the sale or trafficking of children, including for illegal adoption. However, the system is not entirely watertight: there are concerns about false birth registrations, and calls have been made to investigate this issue, including by the Public Prosecution Service and the Child Protection Board.

In the Netherlands, the municipality plays a central role in birth registration. When a birth is reported, the civil registrar not only checks for the correct documents but also looks for any red flags. If, during the registration or in the child's environment, there are signs indicating exploitation, child abuse, human trafficking, or other threats to the child's safety or development, the registrar is required to report this to Veilig Thuis (the counseling and reporting center for child abuse and domestic violence) or the Child Protection Board.

The Child Protection Board then investigates whether there is indeed a threat to the child. If so, the Board may take measures, such as placing the child under supervision or removing the child from the home, to protect the child. The Public Prosecutor's Office and the police may also become involved if criminal offenses are involved, such as human trafficking or illegal adoption.

In addition, healthcare professionals (such as midwives, doctors, and pediatric nurses) and educators are required to report situations of concern. They work together with Veilig Thuis and the Child Protection Board to ensure the child's safety.

In short: during birth registration, there is a mandatory reporting requirement for signs of concern, and there is a clear system in place to address and investigate them.

3. What measures are taken in your country to address vulnerabilities related to the gender dimension of human trafficking?

Authorities pay specific attention to adopting a gender-sensitive approach in all stages of victim identification, communication, and support. Training and continuous professional development ensure that law enforcement personnel maintain up-to-date gender-sensitive expertise, particularly in their interactions with vulnerable women and girls.

In the Netherlands, specific procedures are in place to ensure that the identification of victims of trafficking in human beings (THB) takes gender into account. During interviews and hearings, authorities such as the police and the Royal Netherlands Marechaussee seek, where possible and appropriate, to accommodate a victim's preference to be interviewed by a person of the same gender. This is part of victim-centred and trauma-informed working methods endorsed by the Dutch government.

Protection and support measures for THB victims are organised in a gender-sensitive manner. The Dutch government funds specialised shelters and support facilities for victims of human trafficking, including facilities specifically equipped to support female victims and victims of sexual exploitation. These facilities provide safe accommodation as well as psychosocial care and specialised counselling.

The Royal Netherlands Marechaussee (RNM) applies a specific approach to human trafficking that includes attention to cultural and gender-specific aspects, particularly in the identification, treatment and referral of potential victims. This approach is in line with national policy on victim-centred protection. Within the Royal Netherlands Marechaussee, designated Gender Contact Persons are appointed. These officers have specific expertise in gender issues and human trafficking and serve as internal points of contact. They contribute to awareness-raising, training and the gender-sensitive implementation of human trafficking policies.

NLA
Gender sensitivity is a core principle of the Inspectorate's approach, ensuring attention to the specific vulnerabilities of women and girls throughout the inspection and referral process.

4. What specific measures are taken to reduce the vulnerability to trafficking of persons from disadvantaged minorities? Please provide information on policies and measures in the following areas:

a. research;

The Dutch National Rapporteur on Human Trafficking conducts research on different topics related to human trafficking. Some examples are research to Latin-American sexworkers as victims of human trafficking in the Netherlands[18], migrants who were held for randsom[19], Exploring the Identification of Victims of Human Trafficking in the Asylum Process and Reception System[20], Perpetrators of domestic sexual exploitation: mild intellectual disability and victimization[21].

b. information, awareness-raising and education campaigns;

[18] Latijns-Amerikaanse+sekswerkers+als+slachtoffers+van+mensenhandel+in+Nederland (1).pdf
[19] PUBL_Migranten+als+verdienmodel_INTERACTIEF+DEF.pdf
[20] Verkenning van signalering van slachtofferschap mensenhandel in de asielketen en -opvang | Nationaal Rapporteur
[21] Daders van binnenlandse seksuele uitbuiting: licht verstandelijke beperking en slachtofferschap | Nationaal Rapporteur

Centre Against Child and Human Trafficking

The Centre against Human and Child Trafficking carried out six national and regional campaigns in 2025. These campaigns were set up in collaboration with municipalities, particularly within Prevention with Authority program which focusses on preventing youth and minors from getting involved in criminal activities (for a more extensive description of the program, please see answer 4c).

For example, there was intensive collaboration with the municipalities of Rotterdam and Amsterdam on the Right to Remain Silent project, including the movie that resulted from it. The nationally distributed film includes an impressive final shot with a reference to turning points, as a call to action to viewers. In addition, several online campaigns were run on Instagram, TikTok, and Snapchat with excerpts from the film and from the documentary series by young people about the Zwijgrecht project. Furthermore, various online campaigns were carried out in collaboration with Dealbreakers and Young Perspectives, together with RIEC Midden-Nederland and the municipalities of The Hague and Schiedam. The collaboration with the latter on Rake Woorden (Harsh Words) started in 2025. In this podcast, young people talk candidly about their experiences and the road to a better life. Excerpts from the podcast formed the basis for the Rake Woorden campaign. Collaborations with Preventie met Gezag municipalities are also planned for the coming year. Through all the campaigns, a total of 13,034,180 unique individuals were reached and informed about youth crime, criminal exploitation, and opportunities for help through Keerpunt in 2025.

Ministry of Justice and Security

Several information, awareness and education campaigns on the topic of human trafficking have been conducted.

- On November 20 2025, the new umbrella campaign name: “Stop human trafficking” was launched. The campaign focused on raising awareness by showing the most common forms of human trafficking in the Netherlands. The concept of human trafficking was literally taken and showed how it reduces individuals to products, designed to serve. In this way, it was made confrontational and visible that this is unfortunately still a painful reality, even in the Netherlands. The launch took place in Rotterdam[22]. There was also a website where, besides information, a toolkit for organizations can be downloaded: Sluit mensenhandel uit - CoMensha
- In June 2025 the “Kijk op Mensenhandel” (Focus on Human Trafficking) campaign was launched and is available to all municipalities that want to raise awareness about human trafficking within their own organization. With the available materials, municipalities can easily inform its employees about labor exploitation, criminal exploitation, and sexual exploitation. Campagne 'Kijk op Mensenhandel' - CoMensha
- Escapetruck Human Trafficking (stichting Reshape). This project was initiated by the Dutch National Police, which wanted to do more to combat human trafficking. In addition to the Dutch National Police, it was co-financed by the Ministry of Justice and Security, the Ministry of Social Affairs, the municipalities of Amsterdam, Rotterdam, and The Hague, and finally the embassies of the Kingdom of the Netherlands in Hungary and Poland. Home | Reshapefoundation

  The truck is part of the police's external contacts vehicle pool and is deployed in close cooperation with the police (abroad). The police also finance several foreign trips and/or collaborations each year. Therefore, the work carried out and the objectives behind it are in line with those of the police. The project was initiated by the police, but the foundation is

[22] Sluit Mensenhandel Uit - Aftermovie

independent of the police.

- The education box is a scale model of the escape truck that can be used to visit schools. Based on Ludo teaching methods, young people are made aware of online risks on the internet and specific platforms with the help of a number of (technical and online) game elements. They are also given insight into the methods used by malicious individuals on social media platforms and the internet to recruit and exploit young people Home | Reshapefoundation
- The #GeenBuit awareness campaign was launched on May 12. Defence for Children, Fier, and the Red Cross joined forces for this campaign because they are very concerned about the invisibility of underage victims. The campaign is part of Action Line 6 of the Action Plan Together Against Human Trafficking.

  The campaign focuses on professionals who work with young people, such as teachers, youth workers, special investigating officers, community police officers, healthcare professionals, and counselors. These professionals can play a crucial role in breaking the cycle of exploitation.

  An important part of the campaign is the free e-learning course BUIT for professionals, developed by NHVeilig and Fier. In just one hour, participants learn to recognize signs of exploitation, act safely and carefully when suspicions arise, and call in the appropriate support agencies. Project: Kind en Uitbuiting | Defence for Children
- Combating the exploitation of migrants (Red Cross) which includes signal lists, flyers, e-learnings, toolkits and an online trainingstool for migrants. The main target group are care provides which can play a crucial role in signaling human trafficking. Tegengaan van uitbuiting migranten (Rode Kruis) - CoMensha
- The government cooperated on and funded a national campaign called ‘Onze ogen op Mensenhandel’ which was initiated in 2024 and due to its success continued in 2025. The campaign was drawn up jointly with the Coordination Centre Against Trafficking (CoMensha), the Association of Netherlands Municipalities (VNG) and the Ministry of Justice. The focus was to gain widespread awareness on a national level on the topic of human trafficking during the European day/week against trafficking. Another point was to recognize signs of trafficking earlier so that people could take further steps to help victims and/or prevent trafficking. It included information for different stakeholders and also material for organization to use in raising awareness on the topic of human trafficking. (for example a toolkit which included press briefings, example of social media posts and other relevant aspects organization could use). Onze ogen op mensenhandel - CoMensha.
- Information provision and awareness-raising. FairWork developed accessible information materials in Ukrainian, Russian and English specifically aimed atn Ukrainian refugees. These materials focus for example on the risks and warning signs of labor exploitation, how to recognize untrustworthy work agencies and where to seek help. The materials include practical tips and references to helplines and support organizations.

  Information campaigns were implemented both online and through the distribution of materials at reception facilities, in cooperation with local and national stakeholders. In addition, FairWork organized training sessions at reception locations and for volunteers and staff of grassroots organizations. These trainings focused on recognizing indicators of human trafficking, enabling frontline actors to identify risks at an early stage and refer refugees to the appropriate support services.

c. socio-economic initiatives targeting underlying and structural causes;

Ministry of Justice and Security

The National Program for Quality of Life and Safety (NPLV) focuses on sustainably improving the quality of life, safety, and livelihood security in 20 vulnerable urban areas in the Netherlands. In many of these areas, the "Prevention with Authority" program is also being implemented: a national government initiative designed to prevent young people aged 8 to 27 from becoming involved in or ending up into subversive criminal activity. A total of 27 municipalities participate in Prevention with Authority and receive structural support. This approach takes into account the potential coercion underlying criminal behaviour. As a result, combating criminal exploitation is also an integral part of this approach.

Since 2022, "Prevention with Authority" has been part of the integrated approach in the 20 NPLV areas. The Ministry of Justice and Security (JenV) and the Ministry of Housing and Spatial Planning (VRO) are working together with the NPLV areas to further strengthen the coherence between the programs.

Within the area-based NPLV approach, there is active collaboration between healthcare and safety networks. The local alliances, chaired by the relevant mayor, work together with partners such as the police, the Public Prosecution Service (OM), the Council for the Judiciary, the Child Protection Board, the Dutch Probation Service, and youth probation organizations

Prevention with Authority is implemented in practice within the NPLV areas through local measures that connect different sectors, strengthen early detection, and offer young people prospects. These examples demonstrate how Prevention with Authority in the NPLV areas is part of the broader area-based approach.

In the NPLV areas, "Prevention with Authority" focuses on the early identification of problems and preventing young people from sliding into a life of crime. Local authorities use their knowledge of the neighbourhood to implement appropriate interventions tailored to local issues.

This takes place at school, on the street, at home, and in the digital world. Having a job or being enrolled in an educational program are important protective factors; having debt or lacking a basic qualification are risk factors.

Prevention with Authority is implemented in the NPLV areas through local measures that connect different sectors, strengthen early detection, and offer young people prospects. These examples demonstrate how Prevention with Authority in the NPLV areas is part of the broader area-based approach.

d. education, vocational training and job placement programmes.

5. What specific measures are taken to reduce the vulnerability to THB of persons with disabilities? Please provide information in the following areas:

a. deinstitutionalisation, including community and family-based services for children and support for independent living;

In the Netherlands, policies aimed at supporting vulnerable young people in their transition to independent living are primarily focused on ensuring a smooth, barrier-free transition to adulthood, thereby preventing them from falling behind in crucial areas of life. There are various legal frameworks that provide for this:

- Up to age 18 (Youth Act): The municipality is responsible for young people who cannot live at home. Forms of assisted living, such as room training centers (KTC) or transitional housing,

fall under the Youth Act. Here, young people between the ages of approximately 15 and 17 learn skills such as cooking, budgeting, and managing a household in a step-by-step process.

- Ages 18 and older (Social Support Act / Participation Act): As soon as a young person turns 18, the Youth Act no longer applies. From that point on, individual support, assisted or sheltered housing, and social services fall under the Social Support Act (Wmo). Financial support (such as social assistance benefits) is provided under the Participation Act.
- Long-Term Care (Wlz): For young people with a severe intellectual, physical, or mental disability who require 24-hour care for the rest of their lives, funding is provided under the Long-Term Care Act.

To prevent young people from suddenly finding themselves on the street or losing their trusted support when they turn 18, the Extended Youth Assistance program exists. Under certain conditions, young people can continue to receive youth services until they turn 21 or, at most, 23. This is intended in particular for cases where the ongoing support aimed at helping them become independent has not yet been completed, or where the transition to adult care has not yet been properly arranged.

The national policy—helped shape by the Netherlands Youth Institute (NJi)—follows the Big 5 methodology[23]. This means that a transition to independent living is only successful if stability has been achieved simultaneously in five specific areas of life: housing, support (network), school and work, income and well-being.

b. monitoring institutions and foster families accommodating persons with disabilities;

Ministry of Health, Welfare and Sport

In the Netherlands the specifically appointed *William Schrikker Group* provides specialized youth services, child protection and youth rehabilitation for children with a (cognitive) disability or chronic illness, as well as for parents with a disability. The organization operates nationwide and focuses specifically on situations in which the child's safety or development is as risk.

Foster care parents have the possibility to take in foster children with a physical or mental disability. These foster parents receive additional training and information on how to guide and care for these children and how to recognize unique risks these children face. Knowledge centers such as the National Knowledge Center for LVB provide resources and guidelines for this purpose.

c. procedure for the selection and appointment of legal guardians and monitoring of their work;

Council for the Judiciary

Guardianship is authority exercised by someone other than the parents. In the Netherlands, a guardian may be appointed by the parents or by a judge.

Parents can appoint a guardian after their death by including a provision in their will (through a notary) or registering the appointment in the guardianship registry[24] (through the court).

The court appoints a guardian at the request of an individual or at the request of the Child Protection Board.

In case at the request of an individual, it is important to note that every minor (under the age of 18) in the Netherlands must be under parental authority or guardianship. Through this procedure,

[23] Jongeren ondersteunen bij hun Big 5 | Nederlands Jeugdinstituut

[24] A registry in which legal events relating to parental authority are recorded.

someone can ask the court to appoint them as a child's guardian. The procedure falls under civil law and a lawyer is need to start the procedure. Some examples are:

- The parents have passed away and did not designate a guardian to succeed them after their death. The children's aunt and, together with their partner, wish to become their guardian. They must file a petition with the court.
- The child's grandmother, and the daughter (the mother) was a minor (under 18 years of age) at the time of the child's birth. The grandmother can request to be appointed as guardian.
- A certified agency (child welfare organization) has custody of the child. The child has been living with a foster family for two years. The foster father want to ask the court if he can become the guardian.
- The guardian has a (new) partner. After living together for a few years, they want to serve as the child's guardian together with the new partner.

Beside this there are also guardianship proceedings where the court appoints a guardian or the at request of the Child Protection Board. There are several possible situations:

- One parent with authority passes away

Is there only one parent with parental authority over the child? And does that parent die? In that case, the other parent (the legal parent) without parental authority can apply for it. The court will then usually grant parental authority to the other parent. Only if the court determines that this is not in the child's best interest will it appoint a guardian.

- Parental authority over a child is lacking following the parents' death.

A court clerk checks the custody register to see if the parents have designated a guardian to takeover after their death. If so, and if that guardian is willing to accept guardianship, the acceptance of guardianship is processed through the court clerk's office. In that case, no court order is required.

Did the parents not appoint a guardian? Or is the appointed guardian unwilling or unable to accept guardianship? In that case, the court clerk's office will notify the judge that there is no one exercising parental authority over the child. The judge has two options:
- Immediately notify the Child Protection Board. This usually happens. Sometimes the Child Protection Board is already aware of the death. The Child Protection Board speaks with the child and the family and investigates who would be the best guardian for the child.
- The Child Protection Board may file a petition with the court to appoint a guardian. The guardian may be an individual or a certified organization (youth protection agency). In such cases, the appointment of a guardian always requires a court order. It is not possible to accept guardianship through the court clerk's office.

- Parental authority over the child is lacking because the parents are temporarily unable to exercise it

A guardian may also be necessary if the parents with parental authority are temporarily unable to exercise that authority. For example, if the parents with parental authority are detained or imprisoned abroad, or are under guardianship. Or if the child's mother is a minor at the time of birth. In these types of situations, the Child Protection Board is often already involved with the family or prospective family. The Child Protection Board then investigates who is able and willing to assume guardianship.

If the parent(s) are (temporarily) unable to exercise parental authority, the appointment of a guardian always requires a court order. In such cases, it is not possible to accept guardianship through the court clerk's office. The Child Protection Board investigates who would be best suited to serve as the child's guardian. The Child Protection Board then submits a petition to the court

requesting the appointment of a guardian. The guardian may be an individual or a certified institution (youth protection organization).

Supervision and Monitoring

- The Judge and the Court Clerk's Office: The court retains ultimate responsibility. In the case of a regular guardian appointed after a parent's death, there is no intensive daily monitoring program, provided that everything is going well. However, the judge may intervene if there are signs of problems.
- Certified Institutions (GI): If guardianship has been assigned to a youth protection institution (as part of a child protection measure), the Health and Youth Care Inspectorate (IGJ) and the certified GI itself maintain strict oversight through a youth protection officer.
- Reports and Intervention: Signs of problems (from the child's environment, school, or the ministry) can lead, through the Child Protection Board, to a request to the juvenile court to replace the guardian.

d. access to adequate accommodation, education and work;

VNG:

Efforts regarding people with disabilities are primarily carried out within the framework of general policies related to the Social Support Act (Wmo), inclusive education, and social participation. With regard to combating human trafficking, no specific measures are currently being taken in the areas of access to adequate housing, education, and employment to reduce this target group's vulnerability to human trafficking.

e. access to information and reporting/complaints mechanisms which are accessible to persons with disabilities.

Ministry of Health, Welfare and Sports

There is no single central national hotline in the Netherlands specifically for all questions or issues related to disabilities. However, there are category-specific national organizations and reporting systems where people with disabilities, their loved ones, or care providers can turn for advice, to file reports, or to submit complaints.

Ieder(in): This is the largest national network of people with physical disabilities, intellectual disabilities, or chronic illnesses. They have their own Ieder(in) Contact service, which you can reach out to with questions, problems, or reports regarding accessibility, legislation, and healthcare.

6. How do you ensure in practice that an assessment of the vulnerability and special needs of asylum seekers is carried out at an early stage? What procedures are followed when vulnerability to THB is detected? Please provide information on policies and measures in the following areas:

a. provision of comprehensive and accessible information, in a range of relevant languages, on the rights of asylum seekers, indicators of THB, rights of victims of THB, and contacts of relevant organisations;

Ministry of Asylum and Migration

Multilingual Information: VluchtelingenWerk Nederland (VWN) and the COA provide information booklets, videos, and websites (such as RefugeeHelp) upon arrival in the most common languages of origin (including Arabic, Tigrinya, Farsi, English, and French).

Rights and warning signs: This information covers rights within the asylum procedure but also includes specific warnings and warning signs regarding exploitation (labor and sexual), the methods used by human smugglers/traffickers, and the rights that victims enjoy in the Netherlands.

Contact Information: Information materials always include direct, easily accessible contact information for emergency numbers (such as the police at 0900-8844 or Report Crime Anonymously), CoMensha, and the Red Cross.

b. access to legal assistance and representation;

Ministry of Asylum and Migration

Free Legal Aid: Every asylum seeker in the Netherlands is entitled, from the start of the formal asylum procedure, to a specialized asylum attorney assigned by the Legal Aid Board (RvR). This assistance is provided entirely free of charge.

Preliminary Meeting: During the Rest and Preparation Period, the attorney prepares the asylum seeker for the hearings with the IND and assists the client during these hearings to safeguard their procedural rights.

Representation of Minors: Unaccompanied minor foreign nationals (AMV) are assigned a legal representative (guardian) immediately upon arrival through the independent foundation Nidos. The guardian represents the child's interests in all areas of life and in the legal proceedings.

c. access to decent accommodation, health (including psychological) care, work and education.

Ministry of Asylum and Migration

Housing: Asylum seekers are entitled to accommodation provided by the COA (Central Agency for the Reception of Asylum Seekers). Where vulnerabilities are identified, such as a risk of trafficking in human beings, gender-based violence, or specific medical or psychological needs, the COA may implement additional protective measures. These may include placement in protected accommodation facilities or other forms of adapted housing, depending on the individual's circumstances..

Health Care: Healthcare for asylum seekers is covered under the Healthcare Scheme for Asylum Seekers (Regeling Medische zorg Asielzoekers – RMA). This scheme includes, among other things, general practitioner services, hospital care, mental health care, and other medically necessary treatment. Healthcare for Asylum Seekers (Gezondheidszorg Asielzoekers – GZA) provides and coordinates primary healthcare services at or near most COA reception centres.

Employment: Asylum seekers may engage in paid employment under certain conditions. Currently, an asylum application must generally have been pending for at least six months, and the employer must obtain a work permit (tewerkstellingsvergunning – TWV). The previous restriction limiting employment to a maximum of 24 weeks per year has been abolished. Asylum seekers may also participate in voluntary work, subject to the applicable regulations.

Education: Minor asylum seekers are subject to compulsory education in the Netherlands and have access to schooling, often through newcomer classes in primary education or International Transition Classes (Internationale Schakelklassen – ISK) in secondary education. The aim is to enrol children in education as soon as possible after their arrival. Adult asylum seekers can participate in Dutch language courses, social participation activities, and other educational programmes offered through the reception system to support integration and self-reliance.

Answer Central Agency for the Reception of Asylum Seekers

Almost all asylum seekers who apply for asylum in the Netherlands first register at the reception center in Ter Apel.

Minors are accommodated at a special central reception facility in Ter Apel and are assigned a guardian from the Nidos Foundation. At Ter Apel, Nidos guardians and other social workers work closely together to identify signs of human trafficking and smuggling during intake interviews with unaccompanied minors. Should there be any indications of human trafficking, the minor will be placed in protected accommodation.

With regard to signals involving adults: A COA employee refers a resident to the appropriate authorities, for example, to file a report and to receive medical and/or psychological support or other assistance. The COA works closely with law enforcement and Comensha (National Coordination Centre against Human Trafficking). In practice, COA staff have direct contact with police or care coordinators (Comensha).

This does not, however, mean that transfers to protected reception, organized by Comensha, occur frequently. If someone already has the right to accommodation (with the COA), the principle agreement with the ministry is that they will continue to live at the COA reception center even if they are identified as a victim of human trafficking. Transfers only take place in extreme cases where safety cannot be guaranteed at the COA. This is mainly due to limited capacity, including in the COSMs. Each situation is, of course, assessed individually.

7. What specific measures are taken to reduce the vulnerability to THB of migrant workers (including seasonal workers, seconded/posted workers, domestic workers, diplomatic household employees)? Please provide information on policies and measures in the following areas:

a. provision of comprehensive and accessible information, in a range of relevant languages, on migration and labour laws, worker protection and contacts of relevant organisations;

Answer ministry of Social Affairs and Employment

Migrant workers

In addition to good legislation and regulations, migrant workers need to be better informed about their rights and should be offered more (legal) assistance. This can also include help with housing issues. That is why the government has opened physical and mobile information points throughout the country as part of the Work in NL project for all migrant workers. There are currently active Work in NL information points in 12 regions. Preparations are underway in 23 regions to set up a Work in NL information point.

It is expected that more and more regions will open their Work in NL information points in the coming year. This year, the workinnl.nl website (available in 9 languages) will be revamped to allow for the publication of regional information. In addition, work will continue on concrete initiatives within the Work in NL Alliance, through which employers and housing providers offer support to migrant workers, and we will take further steps to improve information provision in countries of origin.

National Labour Authority

NLA inspectors can distribute cards with QR codes to migrant workers to direct them to the information on www.workinnl.nl. These cards are also multilingual (5 languages).

Fairwork

The ngo Fairwork fights labour exploitation and offers help via the following:

- Offering direct assistance to migrant workers by supporting them to fight fair wages and decent working conditions, informing migrant workers about their rights and referring them to organizations if necessary.
- Providing training to networks around migrant workers who deal with migrant workers in their work including in health care, municipalities, police and employees of other NGOs. They make them more aware and recognize signs of exploitation so that they can undertake action when needed.
- Creating awareness among politicians, policymakers and the general public about abuses, holes in the system and bringing powerful stories of exploitation.
- Conducting research with several Dutch universities and bringing practice to science and science to practice.

Their work focus on the three sectors where serious exploitation is most prevalent, abuses often remain invisible, and victimized migrant workers fall between the cracks. These are: care behind the front door (au-pairs, nannies and care professionals), employment agencies and undocumented workers. They offer flyers and awareness video's in different languages on labour rights in the Netherlands, indicators of labour exploitation and support channels available for victims. Next to this information, FairWork developed specific materials for Ukrainian migrants, live-in domestic workers, (bogus) self-employed persons, au-pairs and for Brazilian construction workers. The flyers are available in several languages and can be found on the website: What we do : FairWork FairWork spreads the information through online campaigns and in facebook/telegram/whats app groups of migrant through the use of cultural mediator and distributes information material at places where migrants gather. Also FairWork organizes information events (workshops) on rights and red flags for vulnerable labour migrants in the Netherlands, together with community based migrant organisations.

b. provision of clear employment contracts;

Answer ministry of Social Affairs and Employment

Workers should receive contracts that comply with Dutch labor laws, including minimum wage, working hours, and safe working conditions. These laws are supervised and enforced by the Netherlands Labour Authority and the trade unions.

Ministry of Asylum and Migration

To reduce vulnerability to human trafficking and labour exploitation among migrant workers, the Netherlands has established specific legal procedures that allow victims to regularise their residence status. Many victims, including seasonal workers, posted workers and domestic workers, are reluctant to report abuse because they fear deportation or the loss of their right to stay in the country. Dutch policy seeks to break this dependency by providing protection measures and residence rights to victims of trafficking in human beings.

1. Residence Scheme for Victims of Trafficking in Human Beings
The principal legal avenue for victims of human trafficking is the residence scheme for victims of trafficking in human beings, currently laid down in Section B8/3 of the Aliens Circular (Vreemdelingencirculaire).

When the police or the Netherlands Labour Authority identify concrete indications of human trafficking or labour exploitation, a migrant may be granted a reflection period of up to three months. During this period, the individual is entitled to lawful residence and cannot be removed from the Netherlands. This enables potential victims to recover and make an informed decision about whether to cooperate with the authorities.

If the victim decides to file a criminal complaint or otherwise cooperates with the criminal investigation or prosecution of the suspected trafficker or exploitative employer, the Immigration and Naturalisation Service (IND) may grant a temporary residence permit. This permit is generally valid for the duration of the criminal investigation and prosecution proceedings.

During this period of lawful residence, victims are entitled to access appropriate shelter, medical care, legal assistance and other support services. Victims may be referred to specialised support organisations, including CoMensha, the national coordination centre against human trafficking. The residence permit carries an unrestricted labour market endorsement, allowing the victim to work legally in the Netherlands without being dependent on a specific employer.

2. Residence on non-temporary humanitarian grounds
In certain circumstances, a temporary residence permit granted under the trafficking scheme may lead to a residence permit on non-temporary humanitarian grounds.

If the criminal investigation or court proceedings against the trafficker are still ongoing after one year, the migrant may be eligible for an extension of their temporary residence permit. They do not automatically become eligible for an independent or permanent residence permit after one year, as additional conditions apply.

A residence permit may be granted on humanitarian grounds where exceptional individual circumstances justify continued residence, such as serious medical or psychological conditions, safety concerns, or a risk of reprisals by traffickers upon return.

Victims who are unable to cooperate with criminal proceedings due to severe trauma, medical or psychological conditions, safety concerns, or their age may nevertheless be eligible for a residence permit, subject to an individual assessment of their circumstances and protection needs.

Specific safeguards for domestic workers employed by diplomats:
Domestic workers accompanying diplomats may be particularly vulnerable because their residence status is often linked to their employer's diplomatic status. Where there are indications of exploitation or human trafficking, the Dutch authorities may take measures to ensure the worker's protection and independent access to assistance. Victims may qualify for protection under the Dutch residence scheme for victims of human trafficking (B8), enabling them to obtain a temporary residence permit independent of their employer. Diplomatic privileges and immunities do not automatically cease upon a report of exploitation, but they do not prevent the Dutch authorities from providing protection and assistance to the victim.

c. access to decent work and housing, health care, social services and education;

Answer ministry of Social Affairs and Employment

The Netherlands has taken significant steps to protect the economic and social rights of migrant workers. The government commissioned an independent review of the situation and is working to implement the recommendations. One key recommendation was the establishment of an admission system for temporary employment agencies to ensure these agencies comply with Dutch law, called the WTTA. This legislation enters into force in 2027. From 2028, it will be enforced by the Netherlands Labour Authority.

Furthermore, a new bill aims to provide greater control over how much, where, and for whom housing is being built. With the enactment of this law, municipalities will develop a public housing program, which must also specifically address the housing needs of targeted groups, such as migrant workers.

In addition, the government is preparing a bill to ensure better rent protection for migrant workers. The government has also opened physical and mobile information points throughout the country for migrant workers with the project Work in NL (see answer question 7).

d. possibility to change employers;

Answer ministry of Social Affairs and Employment

The current policy supports the efforts of the social partners. For example, we are working on reforming the (regional) labour market infrastructure. Within the labour market region, local authorities, the UWV, social partners and educational institutions jointly agree on regional labour market policy. As part of this, regional Job Centres (Werkcentra) are being established. Jobseekers, employees and employers can obtain information and advice here on employment, training, career and HR matters.

This also applies to migrant workers and their employers. It is important that the services provided by the Job Centres are properly aligned with the Work in NL information points mentioned earlier. It is up to the region to ensure that these are coordinated as effectively as possible.

I also encourage people to develop throughout their careers, through:

- sector-specific career pathways (Sectorale Ontwikkelpaden) that provide clarity on how people can progress within a sector or take on a new role, for example in engineering, healthcare, childcare or the green sector.
- Subsidy for training under sector-specific development pathways for socially critical sectors, with additional grants for language training where this is necessary to perform the role.
- A subsidy for SMEs to promote learning and development within their organisations.

These tools can also be used to support the development of migrant workers, for example by addressing language barriers. Finally, Sectoral Training Funds or partnerships in which both employers and employees are represented can also receive grants through the ESF+ scheme for sectors. This subsidy can be used for training and support to help people improve their position in the labour market.

Lastly, the government's coalition agreement has earmarked an additional 100 million euros from 2028 onwards to invest in lifelong learning. This funding will also be available to migrants working in the Netherlands.

e. access to confidential complaints mechanisms;

Answer National Labour Authority:

Via the website of the NLA, migrant workers can report underpayment, excessive working hours, poor working conditions or illegal employment amongst others. There is also a telephone number included which migrant workers can call. The form is available in different languages including English, German, Polish and Romanian. There is also a reference made to the telephone number which can be called to report labour exploitation/human trafficking. Link: Oneerlijk, onveilig, ongezond werk of arbeidsuitbuiting melden | Nederlandse Arbeidsinspectie

In addition to administrative law, certain matters are governed by civil law, such as Article 23 of the Wet Arbeid Vreemdelingen (Wav), which establishes a legal presumption of underpayment in the event of a violation of the Wav. Link: wetten.nl - Regeling - Wet arbeid vreemdelingen - BWBR0007149 and Wet arbeid vreemdelingen | Nederlandse Arbeidsinspectie

f. right to join trade unions and to engage in collective bargaining.

Answer ministry of Social Affairs and Employment

The freedom of association and freedom of contract are of great importance in the Netherlands.

The right of freedom of association is enshrined in the Dutch Constitution (*Grondwet*). The Netherlands has also ratified the European Social Charter, the European Convention on Human Rights and ILO Convention C087 which protect the right to freedom of association. The Equal Treatment Act regulates the prohibition of discrimination based on different grounds, including with respect to union members.

In the Netherlands, the Minister of Social Affairs and Employment is responsible for the legal frameworks of the collective labour agreement system and the system for declaring such agreements generally binding. Within these frameworks, employers and employees are responsible for determining employment conditions. Collective bargaining on collective labour agreements therefore takes place between employers (or employers' associations) and employees' associations.

g. legal avenues for regularising their stay in the country.

To reduce vulnerability to human trafficking and labour exploitation among migrant workers, the Netherlands has established specific legal procedures that allow victims to regularise their residence status. Many victims, including seasonal workers, posted workers and domestic workers, are reluctant to report abuse because they fear deportation or the loss of their right to stay in the country. Dutch policy seeks to break this dependency by providing protection measures and residence rights to victims of trafficking in human beings.

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8. Do labour inspectorates and other authorities checking workplace conditions possess a comprehensive mandate, and adequate human, financial and technical resources, to conduct regular, proactive workplace inspections in all economic sectors, with a particular emphasis on high-risk sectors prone to exploitation? How do labour inspectors co-operate with other authorities and trade unions? Is there a separation between labour inspection and immigration control functions?

National Labour Authority
Inspection visit by the NLA

1. Selection of companies

This is being done based on the following:

-
- Selection based on risk analysis
  The Dutch Labor Inspectorate focuses on the most significant risks that stand in the way of safe, healthy, and fair work. To this end, the Inspectorate conducts comprehensive risk assessments. The Inspectorate identifies and prioritizes the most significant societal risks. These include risks related to: the safety and health of workers, fair work (illegal employment, underpayment, exploitation) and a well-functioning system of work and income.

  The risk analyses identify certain sectors and themes that are given particular priority. These include sectors such as construction, cleaning, and agriculture and horticulture. In the construction sector, for example, there is a risk of illegal work involving carcinogenic substances. Examples of themes include: asbestos, unscrupulous staffing agencies, and sham arrangements.

  By conducting risk analyses and making selections at the company level, the Inspectorate can focus on companies where the risk of violations is highest, where abuses occur, and where repeat offenders are found.

- Selection based on projects, prior violations, complaints and reports, and workplace accidents.

- Selection based on Brzo or ARIE companies
  For companies subject to the Major Accidents Risks Decree (Brzo), the decree mandates annual inspections. This is because the nature of their operations entails a higher risk, as these companies store or process large quantities of hazardous substances. An annual

inspection plan is therefore drawn up for this purpose. Based on the risks posed by these companies, an assessment is made of how often per year and for how many days these companies will be inspected. In advance, an administrative inspection program covering an average of five years sets out how this assessment and the inspections will be carried out. This inspection frequency is laid out in a so-called supervision model. For some companies, this assessment determines that they do not need to be inspected every year.

In addition to companies covered by the Brzo, there are also so-called ARIE companies. ARIE stands for Additional Risk Inventory and Evaluation. Every company must prepare a risk inventory and evaluation for the hazards and risks within that company. ARIE companies have an additional obligation in this regard, as they also handle large quantities of hazardous substances. However, since these quantities are lower than those specified in the Brzo, these companies do not quite fall under the Brzo regulations. The inspection procedure is virtually the same as under the Brzo 2015, but under these regulations, inspections are conducted exclusively by the Dutch Labor Inspectorate.

2. Method during an inspection
   The Dutch Labor Inspectorate is authorized to conduct inspections without prior arrangement with the company to be visited. Furthermore, the Inspectorate does not need the employer's permission to enter the premises. The inspector may request access to documents and data and ask questions to employees. Employers are required to cooperate. They have no choice in the matter, nor can they influence the inspector's methods.

For more information on inspection visits, please visit the following link: Een inspectiebezoek | Nederlandse Arbeidsinspectie

National Cooperation
The basic principle of the Netherlands Labour Authority is "Collaboration renders more results". Collaboration is important for flexibility and innovation. Therefore, the NLA uses of a combination of interventions. The Netherlands Labour Authority inspects, investigates, conducts research, communicates, puts pressure on clients and promotes a chain approach and collaboration. When necessary inspections are repeated until the shortcomings are remedied. The Labour Authority also follows the implementation of promised improvement measures regarding the functioning of work and income or certification systems. The supervision is exercised in collaboration with other national inspectorates, the Tax and Customs Administration, municipalities, the Employee Insurance Agency (UWV) and the Social Insurance Bank (SVB). Parties work together in criminal investigations under the direction of the Public Prosecution Service (OM). Promoting compliance is done in collaboration with stakeholders such as social partners, chain organisations and knowledge organisations. For more information please check the following factsheet: What does the Netherlands Labour Authority do | Netherlands Labour Authority

International Cooperation
International cooperation and cross-border inspection within the European Union (EU) is becoming an increasingly important aspect of the Authority's work. As a consequence it is collaborating with other Member States and the European Labour Authority (ELA) to tackle labour market abuses. When it comes to matters relating to healthy and safe working conditions, the Netherlands Labour Authority works in partnership with the Senior Labour Inspectors Committee (SLIC).

Separation between labour inspection and immigration control functions
The ILO cites the establishment of "firewalls" between the Labor Inspectorate and immigration enforcement as a best practice for safeguarding the rights of migrant workers in practice. In the Netherlands, oversight of these legal areas is carried out by different organizations. Incidentally, this

"firewall" does not mean that cooperation between these organizations cannot or should not exist, provided that it does not interfere with the primary tasks of the Labor Inspectorate (namely, the protection of workers) as defined in the ILO Convention. The ILO also mentions this cooperation. For example, the "Guidelines on general principles of labor inspection" state that labor inspectorates should establish cooperation agreements with organizations with which they share goals and tasks, including the police and immigration services. The Technical Brief on "Labor Inspection and Monitoring of Recruitment of Migrant Workers" notes that such collaborations are proving effective, including in the United Kingdom, Belgium, and the Netherlands.

9. How are employment and recruitment agencies regulated and monitored? Are all stages of the recruitment process, including advertisements, selection, transport, and placement, subject to regulation? Are recruitment fees and related costs prohibited from being borne by workers or jobseekers?

Answer ministry of Social Affairs and Welfare

In November 2025 the Senate adopted the legislation that introduces a public admission system for temporary employment agencies. With the public admission system, temporary employment agencies are only allowed to provide their labour solutions if they have been admitted. In order to be admitted, temporary employment agencies have to demonstrate that they adhere to a set of standards including labour, tax, and social security regulations. As a result, temporary work agencies who do not adhere to these standards, will no longer be allowed to provide services on the Dutch market.

The report of the Taskforce Protection of Labour Migrants includes recommendations on regulating the recruitment and temporary work agencies in order to prevent human trafficking of labour exploitation. On 11 November 2025, the Dutch Senate adopted the Admission for Allocation of Workers Bill (Agency Licensing Bill). The Ministry of Social Affairs and Employment (SZW) is responsible for the implementation of the bill. This law introduces an authorization system for lenders, whereby companies may only lend workers if they have obtained authorization to do so. Companies can obtain authorization if they can submit a Certificate of Good Conduct (VOG) and pay a deposit. In addition, they are required to periodically submit an inspection report demonstrating their compliance with the relevant laws and regulations. The purpose of this law is to introduce an equal playing field for temporary employment agencies and to protect vulnerable workers, particularly migrant workers. Through this law, the government aims to tackle abuses in the temporary employment sector. The expected entry into force is planned for 1 January 2027. Starting on 1 January 2028, the Netherlands Labour Authority will enforce the admission requirement.

In addition, a ban on hiring and lending of temporary workers in the meat industry is being prepared. Only in the meat industry is there evidence of widespread and systematic abuse, with no improvement in sight. A temporary employment ban makes it possible to prohibit the hiring and lending of temporary workers in specific sectors. It will take approximately one year to develop and prepare a ban before it can come into effect. A new cabinet can decide whether the meat sector itself has shown enough improvement or if they will introduce the ban on temporary agency work in the meat sector.

10. How do you prevent and sanction abuses of legal constructions such as self-employment, letter-box companies, sub-contracting, and posting of workers, which may be used to commit THB?

National Labour Authority:

The Labor Inspectorate exposes revenue models and identifies undesirable situations so that other organizations, such as government ministries, can take action and bring about structural improvements in the labor market. Financial incentives and revenue models are very powerful and often legal, such as subcontracting. The Labor Inspectorate cannot take action against these. Following the Labor Inspectorate's report titled "Immediate Dismissal in the Meat Sector," a ban on

temporary staffing in the meat sector is now looming over the market (please see below for further explanation).

There are various initiatives to address abuses involving the misuse of legal structures.

For example, the temporary employment sector is well regulated by the Wtta, which will take effect in 2027. The Act on the Authorization of the Provision of Workers (Wtta)[25] ensures that staffing agencies may only provide workers if they are authorized to operate in the staffing market. Similarly, companies that hire workers (client companies) may only work with staffing agencies that are authorized to operate in the staffing market.

Temporary staffing agencies and other companies that provide temporary workers must be licensed to operate in the temporary staffing market; only then may they provide temporary workers. A new organization, the Dutch Temporary Staffing Market Authority (NAU), will evaluate the applications. The evaluation of companies will begin on July 1, 2027. The NAU maintains a public registry. This is a list of all approved companies. Anyone can view this list.

Effective January 1, 2028, the rule is as follows: companies may only hire employees from a staffing agency that appears on this official list. Effective January 1, 2028, the Dutch Labor Inspectorate will monitor compliance and may impose fines on companies that work with staffing agencies that are not authorized, as well as on staffing agencies that continue to provide workers without authorization.

With the implementation of the Wtta:

- lenders are subject to a licensing requirement;
- hirers are subject to a verification requirement;
- a public registry of licensed lenders and designated inspection agencies will be established;
- lenders will be assessed in advance and on a periodic basis by inspection agencies;
- oversight of the lending market will be strengthened

The law applies to staffing agencies. These are companies that, in exchange for compensation, make employees available to perform work under the supervision and direction of another party. This includes, among others:

- temporary staffing agencies;
- secondment agencies;
- payroll companies;
- companies that occasionally provide staff.
- The law also applies to client companies. These are companies that hire staff from staffing agencies.

Tackling bogus arrangements requires a more in-depth approach than the usual investigations into labor market legislation. Such arrangements are often not limited to labor laws alone, but also extend to, for example, revenue models involving housing and transportation costs, deductions for health insurance premiums, summary dismissal, and bogus self-employment. A recent publication by the Labor Inspectorate provides further insight into revenue models: Revenue Models Involving Labor Exploitation and Serious Disadvantage of Migrant Workers. Therefore, these issues are best addressed through a comprehensive approach involving many relevant partners, such as the Labor Inspectorate, the Tax and Customs Administration, and the CIBA (Coordination Point for the International Posting of Workers of the Tax and Customs Administration), the Criminal Investigation Department, the Employee Insurance Agency (UWV), the Social Insurance Bank (SVB), fellow inspection services from Germany, EURIEC, and the ELA. Each investigation requires a different approach, which is discussed

[25] Wet toelating terbeschikkingstelling van arbeidskrachten | Nederlandse Arbeidsinspectie

by inspectors in close collaboration with various partners in the supply chain. Investigations are initiated both on the basis of the inspectors' own inquiries and on the basis of reports received.

By posting workers from other EU/EEA member states, certain employer costs can be avoided. This can put pressure on the level playing field for companies. The European legal framework for posting is unclear regarding what constitutes a "country of habitual employment" or "temporary nature," making it difficult to prove unlawful posting. The Netherlands is currently seeking to bring this issue to the attention of the European Commission through a position paper. In addition, the Netherlands is examining how clarifying national legislation could help combat arrangements involving third-country workers from other member states.

Dozens of digital platforms are active in the Netherlands. A number of them effectively act as employers, but they claim to merely provide a digital marketplace where the supply and demand for services converge. As a result, workers are classified as self-employed for these platforms, even though they are, in fact, employees. No social security contributions are paid on behalf of these workers. Furthermore, they do not receive continued pay during sick leave, do not accrue pension benefits, and do not receive vacation pay. To the workers, the hourly wage often seems high compared to that of a salaried employee, but for the platform, labor costs are many times lower because, aside from the hourly or piece-rate payment, they have no other labor-related expenses.

False self-employment means that someone presents themselves as self-employed, even though, under labor law, they are in an employment relationship. By offering such contracts, clients disrupt the level playing field and the client (i.e., the employer) evades its obligations to the Tax Authority and the worker. Since January 1, 2025, the Tax Authority has been conducting comprehensive audits for bogus self-employment in relation to payroll taxes. Companies and organizations that hire bogus self-employed individuals may face additional payroll tax assessments. If the Tax Authority determines that bogus self-employment has occurred, it can immediately impose correction obligations and additional payroll tax assessments. If bogus self-employment is found to exist, the employer must retroactively pay payroll tax, employee insurance premiums, contributions under the Health Insurance Act, and, in some cases, pension contributions. A collective bargaining agreement may also apply, which employers must comply with, or a mandatory pension fund may be required. See also the Cabinet Letter "Clarity for the Self-Employed". [26]

A mailbox company is a business that has only a mailing address or a vacant office. Usually, the mailbox company is located in a country with low social security contributions and minimal formalities. The actual work and management take place in another country. Temporary employment or secondment arrangements are used to employ migrant workers cheaply in the "expensive" country where the work is actually performed. Work permits issued by another member state are also misused to second low-cost workers from third countries. This arrangement is deliberately chosen to keep labor costs as low as possible. Unraveling these types of fleeting arrangements by the Labor Inspectorate is time-consuming, because they are cross-border in nature and require cooperation from foreign authorities. Before the arrangement has been fully unraveled, another arrangement is already being used and/or the companies employing the arrangement have changed.

The Labor Inspectorate frequently encounters chains involving contractors and subcontractors. Examples include the construction industry, parcel delivery services, the meat sector, and, among others, transnational temporary staffing arrangements. Such arrangements obscure employer liability. For enforcement purposes, long and complex chains are difficult to manage, as these chains must be unraveled for each individual employment relationship in order to determine who, from a legal standpoint, qualifies as the employer under labor laws. In the Netherlands, civil law chain liability

[26] Kamerbrief over kabinetskoers rust en duidelijkheid onder zelfstandigen | Rijksoverheid.nl

applies to wages, for example, in temporary staffing and subcontracting arrangements. Following the SER advisory report on labor migration, the Ministry of Social Affairs and Employment is examining how this chain liability can be made more effective.

On July 3, 2027, the Ministry of Social Affairs and Employment decided to impose a ban on temporary agency work in the meat industry. As early as 2011, a parliamentary inquiry had already uncovered fraudulent practices in the meat-processing industry. For fifteen years now, there have been repeated reports of abuses. Migrant workers are underpaid and fired when they get sick. In addition, there is intimidation, and after a serious accident, you are left to fend for yourself. The Labor Inspectorate concludes that violations of labor laws occur twice as often when temporary agency workers are employed.

The meat industry was required to implement two measures by the June 15, 2026, deadline to significantly reduce abuses. The sector has not taken these measures seriously enough. By July 2026, 80% of the workforce should have been directly employed. In both the white-meat and red-meat sectors, only about half of the workforce is directly employed, even though the work is structural in nature. Red meat includes, among others, pigs and cattle, while white meat includes, among others, chickens. This represents insufficient progress toward resolving the abuses. The sector is working on plans to increase these percentages, but this change is not happening fast enough. The meat supply chain has thus failed to take sufficient ownership of the issue and continues to outsource the vast majority of its structural work to temporary staffing agencies.

The Temporary Staffing Ban

- The temporary staffing ban prohibits the hiring and lending of workers throughout the entire meat supply chain.
- The ban will apply to companies engaged in the following activities: slaughtering, processing, chilling, and freezing meat.
- Positions not directly related to primary meat production—such as sales staff or administrative personnel—are exempt from the ban on temporary agency work.
- Small businesses employing fewer than 20 people are not subject to the ban.
- The Labor Inspectorate will monitor compliance with the ban on temporary agency workers. This measure will make it easier to monitor and enforce compliance with labor laws because it clarifies who, from a legal standpoint, should be considered the employer.

Next Steps

- The ban takes effect on March 1, 2028.
- For existing employment relationships, a transition period applies until June 1, 2028.
- As of June 1, 2028, the ban on temporary agency work in the meat industry will therefore be fully in effect.
- This means that, following the announcement of the measure, companies will have 23 months to prepare.
- On 3 july 2026, the measure will be opened for public consultation online. This consultation will last 8 weeks.
- In addition, as promised, the measure will be submitted to the House of Representatives for review.

11. How do your country's migration legislation and policies seek to prevent THB by enabling lawful migration and legal employment opportunities accompanied by decent work conditions?

IND:

There are legal ways to find work in the Netherlands, for example as a highly skilled migrant or the single permit. The residence scheme for victims of human trafficking and the residence scheme that

soon will be introduced for victims of particularly exploitative working conditions that do warrant the application of criminal law, but that are not so serious as to constitute human trafficking, aim to enable victims to prolong their stay while granting them free access to the labor market. Additionally, the implementation of the revised Single Permit Directive stipulates that single permit holders who have who have experienced particularly exploitative working conditions, shall retain their right of residence for three months after becoming unemployed, to seek new employment.

12. How do your country's law and policies to discourage demand that leads to THB address particular vulnerabilities and groups at risk of THB?

Ministry of Justice and Security:

The use of sexual services of a victim of human trafficking is punishable Under Article 273g of the Dutch criminal code. The revised EU Directive on human trafficking requires to amend the scope of the current criminalisation of the use of sexual services of a victim of human trafficking (Article 273g of the Dutch Criminal Code) to be broadened to the use of non-sexual services of a victim of human trafficking. Article 273g of the Dutch Criminal Code will be amended to comply with the requirement under the EU-directive.

Ministry of Social Affairs and Employment:

In very severe cases, labour abuses can meet qualifications of human trafficking. The government is taking significant steps to discourage the demand that can lead to victims of labour exploitation. This legislation was adopted by the Senate in November 2025. The aim of this legislation is to protect vulnerable workers and to ensure an equal playing field for temporary employment agencies. This legislation will enter into force in 2027 and from 2028 on will be enforced by the Netherlands Labour Authority.

Besides that, in the meat sector, where systemic abuses are evident and no improvement is seen, we are preparing a ban on contracting temporary staffing agencies to recruit temporary workers. With the other three sectors (cleaning, transport, and agriculture), discussions with stakeholders are being held about what they can implement to combat abuses (see answer 1).

Through the labour market package, the government is committed to ensuring that people on flexible contracts have greater certainty regarding their income and working hours, and that bogus self-employment is reduced. The 'Greater Security for Flex Workers' bill is currently being debated in the House of Representatives. In addition, work is underway on a bill designed to ensure that the use of temporary agency workers remains temporary. This bill introduces a maximum period of 36 months for the use of temporary agency workers, with an open regime for those on permanent contracts. The IBO Labour Migration also advises on labour market policy to discourage the use of temporary agency contracts for permanent work and to increase the cost of low-paid labour.

Also, the Dutch government has announced that it is going to increase the fines of the NLA for violations of certain labor laws. Reason for this is that the fines have not been indexed in the past. The percentage by which the fines are going to be increased will be based on indexation over a number of years in the past and is expected to be approximately 18% per violation. From now on, the fines will be indexed annually.The Dutch government is taking action to modernize the human trafficking legislation (Article 273f of the Dutch Criminal Code). The aim is to make the criminal law approach to human trafficking - including labour exploitation and serious disadvantage more effective and to improve the prosecution of offenders and the protection of victims. The new law creates more possibilities to protect the most vulnerable workers, such as undocumented persons and to punish perpetrators who make advantage of their vulnerable position. This bill will soon be discussed in in the Senate.

As part of the bill, funds have been made available to hire more detectives and public prosecutors. In addition, in 2023, the Investigation Unit of the Netherlands Labour Authority established a specialized Labour Exploitation Department, where the process of reporting, intake and investigation takes place within the same department.

13. How do your country's legislation and practice ensure that there is an individual assessment of protection needs at the borders prior to any refusals of entry or expulsions?

Royal Netherlands Marechaussee

Border guards from the Royal Netherlands Marcheaussee have been trained to conduct human trafficking screenings. They are able to identify specific or alarming signs that can indicate possible human trafficking in the front line, after which an informative interview can take place. If needed, they can identify a victim of human trafficking and offer them the so-called reflection period. The aim is to enable victims to recover a minimum of psychological stability and to allow them to make an informed decision on whether they want to co-operate with the competent authorities in the investigation and prosecution of traffickers. During this period, it is not possible to enforce expulsion orders against the presumed victims, thus guaranteeing them essential protection.

14. What measures are taken to prevent THB in sports? What sectors and categories/groups of people have been identified as being at risk?

In the Netherlands, no separate policy has been developed specifically for the sports sector with regard to "trafficking in human beings" (THB). The Dutch government combats human trafficking through a general national policy that also applies to the sports sector, but without specific attention to athletes or the sports sector. Sports associations and federations (such as the KNVB, UEFA, FIFA, and other international sports federations) do focus—in addition to the leagues—on integrity, the protection of minors, the regulation of transfers and player agents, and human rights. For example, FIFA has rules governing international transfers of minors, the oversight of player agents, and policies regarding human rights. Dutch soccer clubs and player agents must comply with these rules. These rules are designed to prevent the abuse and exploitation of young soccer players. Although these rules were not explicitly drafted as anti-human trafficking legislation, they reduce the risk that vulnerable players will become victims of human trafficking or labor exploitation.

15. Have you identified online practices that may increase the risk of becoming a victim of THB for different forms of exploitation? What mechanisms have been developed to prevent the misuse of information and communication technology for THB purposes? What is the practical effect of their implementation?

Centre Against Child and Human Trafficking

Turning Point (Keerpunt), the platform for children, young people who are victims of criminal exploitation, at-risk or stuck in criminal networks in other ways know that children and young people are approached via online channels to carry out criminal activities. Turning Point carries out targeted online campaigns and, to a lesser extent, offline campaigns (banners, posters etc.) that refer (potential) victims to its online platform for information and help. In 2025, almost 200,000 persons visited the website, leading to over 500 conversations with children and young people. Additionally, direct online outreach is carried out in cooperation with Spine, the tech NGO that, like Keerpunt is part of national health care organization Fier. This takes place predominantly in Telegram groups which focus on criminal activities. Spine access groups and inform users who are displaying risk-taking behaviour (for example, offering their services) about the availability of help of Turning Point. In comparison to groups related to risks of sexual exploitation (i.e. groups about sex work and

exposing), users in groups about criminal assignments tend to leave less contact details, which makes it more difficult to conduct outreach to potential victims of criminal exploitation in these groups.

The tech NGO Spine (part of Fier) sees that small online communities of vulnerable groups such as pro ana (pro anorexia) or auto-mutilation groups are getting attention from malicious actors who may intend to groom victims for sexual violence or exploitation, or harm them in other ways. In general, such groups tend to be closed to outsiders, but some are open to cooperation that makes their community safer. Spine does so under the Safe Havens programme.

Answer National Police:
Technology is used to recruit victims, but also for control purposes and to facilitate/support the actual exploitation. This includes managing and controlling social media accounts, using phones to track victims, and using information obtained to persuade people to perform certain actions. This information may also be false and/or fabricated. This is becoming increasingly easy and widespread with the rise and use of AI.

16. What measures are taken to raise awareness of the risks of technology-facilitated THB, including among children, parents, teachers, child care professionals and social workers? What technology-based initiatives exist in your country to disseminate information to groups/communities at risk of THB?

Centre Against Child and Human Trafficking
Turning Point (Keerpunt): [27]Targeted online campaigns on criminal exploitation, focusing on a wide range of subthemes from drugs related crime, money mules, placement of explosives, violence, etc. Turning Point cooperated with multiple municipalities in targeted local campaigns that referred (potential) victims of criminal exploitation to online information and help. In 2025, the content reached a total of 41 online views.

The Keerpunt online support platform was developed specifically for young people who are trapped in a life of crime, are being exploited within that environment, or are vulnerable to such exploitation. The platform is based on the following three pillars:

- Proactive online outreach: Reaching out to young people via social media (such as Snapchat and TikTok) and online advertisements to make them aware of their situation and the help available.
- Anonymous support chat: A safe and accessible environment where victims, those involved, and their social circles can chat directly and anonymously with experts.
- Knowledge portal: An online hub with reliable information about criminal exploitation, aimed at offering perspective and showing ways out.

National Action Plan
Within the Action plan a specific action focuses on strengthening the position of underage victims. One of the activities focuses on the awareness raising amongst professionals that work with underage victims, specifically those professionals that work in schools. Within these activities there is also attention for the risk of technology-facilitated THB.

17. How do you cooperate with ICT companies and Internet service providers, including content hosts and social media, in preventing THB?

Answer Public Prosecutors Office
In the context of combating technology-facilitated THB, the Netherlands Public Prosecution Service (OM) has, since autumn 2022, held a series of discussions with advertising and sex work platforms

[27] Home - Keerpunt

(ASWs), in cooperation with relevant chain partners and non-governmental organizations. The purpose of these discussions was to explore options for self-regulation within the sector, addressing key issues such as door policies, content moderation, age verification, and reporting obligations.

These dialogues did not result in the adoption of binding measures. The OM subsequently reported this outcome to the Standing Committee on Justice and Security of the House of Representatives. Following this, the State Secretary for Justice and Security committed to diminishing the non-binding character of the existing arrangements and to examine possibilities for enhanced regulation, including through the application of the EU Digital Services Act (DSA). It remains under assessment to what extent the DSA is applicable to these specific types of service providers.

At the end of 2025, the OM issued a warning letter to the largest ASW provider in the Netherlands, representing approximately 80–90 percent of the market. The letter indicated that the absence of effective content moderation may entail a criminal risk of facilitating unlawful residence of sex workers from outside the European Union. The communication further emphasized that the same risk applies — in an aggravated manner — with respect to minors, for whom access must be strictly prevented. As a direct result of these interactions, the platform provider has implemented identity and age verification measures as of 1 April 2026, aimed at excluding third-country nationals without a valid residence status and minors from access to its services.

The Public Prosecution Service continues to monitor developments in this sector and to maintain dialogue with relevant ICT companies and Internet service providers regarding preventive mechanisms against THB, including enhancements in moderation and verification systems and the effective implementation of DSA-related obligations where applicable.

Answer Ministry of Justice and Security:
Reports were received that advertisements featuring potential victims of human trafficking—including a large group of Latin American victims—were being posted on Dutch sex ad websites. Therefore, in 2025, the Ministry of Justice and Security, in collaboration with the Public Prosecution Service, the police, and the country's four largest municipalities (The Hague, Rotterdam, Amsterdam, and Utrecht), launched an initiative to tackle human trafficking on Dutch sex ad websites. The goal is to engage in dialogue with the owners of the biggest Dutch sex ad websites in question and to collaborate with them to prevent human trafficking on the sites.

The first meetings with the biggest owner of Dutch sex ad websites have now taken place, and the first successes have been achieved. These are:

- *100% ID-verification for all advertisers*
  Effective April 1, 2026, for new advertisers. For all existing advertisers, the websites will begin verifying identity documents as of April 1, 2026; that is, verifying that a valid ID has been provided and conducting a nationality check. This process will be fully completed by July 1, 2026, at the latest.
- *Exclusion of advertisers who are non-EU nationals, offer in-person sex work, and cannot demonstrate that they are authorized to work in the Netherlands*
  For new advertisers effective April 1, 2026. For all existing advertisers offering in-person sex work, the ID check and, in the case of "third-country nationals," the verification of any proof they may provide of their right to work in the Netherlands will be conducted simultaneously and completed by July 1, 2026, at the latest.
- *Active provision of information to all advertisers*
  Starting March 1, 2026, all advertisers will be informed in detail and explicitly that they may only advertise if they are authorized to work in the Netherlands. As of April 1, 2026, they will be required to confirm digitally that they are legally residing in the Netherlands and are authorized to work.

Answer National Police:
Police uses web crawling software, train colleagues to recognize signals, and try to improve work processes. Police seeks cooperation with external partners in the form of providers, banks, and universities. This cooperation focuses on knowledge and information sharing, setting up work processes to reduce and spread risks, and gaining new insights. There is also a focus on OSINT and SOCMINT and building an intelligence position.

18. How are policies and practices aimed at preventing THB informed by the experiences of victims and at-risk individuals?

Centre Against Child and Human Trafficking:
Turning Point (Keerpunt): Turning Point in their work against (child) criminal exploitation works together an advisory board of survivors/experienced experts who advise on a wide range of issues, including language, website, development of methods and the improvement of online outreach.

Action Plan Together Against Human Trafficking
Action Line 3 of the National Action Plan 'Together Against Human Trafficking' consists out of several actions to improve investing in and work towards more effective identification and protection of victims. One of the actions that is included in this action line is to include how experts with lived experience can play a role in tackling human trafficking.

On 5 September 2025 the kick-off meeting of the peer group of experts by experience within the "Together Against Human Trafficking" program took place. This group consists of eight experts by experience with extensive knowledge of approaches to combating human trafficking. Their involvement is of great value: they provide insights that contribute to policies better aligned with the reality of (potential) victims.

The Ministry of Justice and Security has asked Comensha to play a coordinating role in the establishment and further development of the focus group. Comensha works with the focus group, on the systematic use of experiential expertise in the fight against human trafficking. The experiential experts can also be engaged by other organizations involved in the Together Against Human Trafficking program. The kick-off meeting took place in September 2025.

Ministry of Social Affairs and Employment
The Expert Group on Migrant Workers met for the first time on April 21, 2026, and provides both solicited and unsolicited advice to the Ministry of Social Affairs and Employment (SZW) on policy and research related to migrant workers. This ensures that their voices and needs are given greater consideration in the policy-making process. The group meets in person approximately once every two months.

PLATFORM HOPE
To ensure that victims' voices are heard, a platform of experts by experience has been established: the HOPE platform, which now has ten members. These are adults who were victims of sexual exploitation during their childhood or adolescence and have become experts by experience. They use their personal, experiential knowledge to help improve the approach to combating the sexual exploitation of children.

The HOPE Platform, initiated by CKM and Defence for Children - ECPAT, advocates for the interests of victims and serves as a dialogue partner for the government, policymakers, law enforcement agencies, social services, and other organizations. The platform has drawn up an improvement agenda centered on breaking down taboos, providing victim-friendly support, and improving the

process for filing reports. In addition, the platform serves as a source of information, advisor, collaborator, educator, and project developer in participatory processes or as a sounding board.

The HOPE platform for experts by experience is part of the work of the Coalition Against Child Sexual Exploitation. The Coalition's goal is to combat the sexual exploitation of children in the Netherlands. Defence for Children – ECPAT, FIER!, and the Center Against Child Trafficking and Human Trafficking (CKM) are implementing the program. The Verwey Jonker Institute is involved in this project through action research.

g. IDENTIFICATION OF VICTIMS AND PROTECTION OF THEIR RIGHTS (Articles 10, 11, 12, 14 and 16)

19. Among the victims of THB identified, were any subjected to exploitation on the basis of their sexual orientation and/or gender identity (LGBTI+: lesbian, gay, bisexual, transgender or intersex), especially teenagers and young adults? If yes, did any of them report on police misconduct?

National Police:
No, the registration of victims of THB within the police is being done based on the form of exploitation. Sexual orientation and/or gender id is not being registered. Therefore it is not possible to draw any conclusions.

Answer Comensha:
While Comensha has registered a small number of transgender victims, the available data do not allow for conclusions regarding whether being transgender was a factor contributing to their vulnerability to trafficking. In addition, Comensha has not received signals or reports indicating inappropriate treatment of transgender victims by specialised human trafficking investigators. At the same time, Comensha does not have sufficient information to draw any conclusions regarding interactions with police departments or law enforcement officials, especially outside the specialised trafficking units.

20. What specific measures are taken to ensure that trafficked persons who are migrant workers, including in an irregular situation, are identified as victims of THB and have access to the rights provided for in the Convention? Is there cooperation with specialised NGOs, trade unions, and employers to enhance the identification and protection of potential victims within these at-risk groups?

Answer Ministry of Asylum and Migration
To ensure that migrant workers – including undocumented migrants – are effectively identified as victims of human trafficking and have access to their rights under the Council of Europe Convention on Action against Trafficking in Human Beings (monitored by GRETA), the Netherlands applies a multi-agency approach. In this framework, law enforcement authorities cooperate closely with civil society organisations, trade unions, and the private sector.

The Dutch Labour Inspectorate (NLA) prioritises the detection of labour exploitation and the protection of victims in cases of suspected trafficking.

When indicators of human trafficking are identified by the police or the NLA, potential victims may be granted a reflection period of up to three months. During this period, removal measures are suspended, and individuals may access safe accommodation, medical and psychological care, and legal assistance where applicable.

The NLA conducts targeted inspections in high-risk sectors such as agriculture, logistics, construction, and hospitality. Inspectors are trained to identify indicators of exploitation, including document retention, underpayment, unsafe housing, and coercion.

Answer National Police:
The Netherlands Police is utilizing a working process called 'cross-domain information led working process on trafficking in human beings' (DIGW) that uses intelligence in the detection of human trafficking and the victims of human trafficking. It is a bridge between intelligence and investigation procedures. This working process uses knowledge-based models to translate criminal laws into factual indicators. The indicators are systematically organized and receive 1, 2, or 4 points. All available information in relation to human trafficking is scored. On its own, certain information can be insignificant, but combined with other bits of information found in other sources (sometimes hidden in police registration systems) it can become a significant sign that a person might be a victim of human trafficking. The pieces of information are stored together and can add up to an intelligence report that might require immediate action or further investigation by police. With this method (presumed) victims might be detected in police reports not related to trafficking in human beings. This leads to investigations and extraction of the (presumed) victim out of the trafficking situation.

The police and Public Prosecution Service prepare an individual assessment of the risks faced by crime victims, which includes victims of THB. General protection measures for victims and witnesses include the possibility for the victim to give evidence outside the presence, or at least the view, of the defendant, by videoconference or, in exceptional cases, completely anonymous. It is also possible that the record of the interrogation of a victim by an investigating judge during the criminal investigation can be used at the trail of the perpetrator later. Furthermore, the Dutch prosecutors directive includes minimum standards of the proper treatment of victims during the investigation, court proceedings, providing information of or assistance with immigration relief, legal support and advice and free victim support.

Answer Ministry of Social Affairs and Employment
Work in NL
The government has strengthened the information provision for migrant workers in general, also available for at-risk groups with the project Work in NL (see answer question 7).

Support NGO FairWork
Furthermore, The Dutch government funds the civil society organisation FairWork. FairWork supports migrant workers, including undocumented workers and persons in vulnerable or irregular situations, in claiming their labour rights, for example by assisting them in recovering unpaid wages and addressing exploitative working conditions. In addition, FairWork plays an important role in the early identification of potential victims of trafficking in human beings (THB) and labour exploitation. Through its outreach activities, multilingual information provision, confidential, free and independent support services, and cooperation with labour inspectors, municipalities, shelters, and other civil society organisations, FairWork helps potential victims access protection, assistance, and referral to the appropriate authorities and support services.

Investigation Service of the Netherlands Labour Authority (NLA)
The Investigation Service of the NLA investigates human smuggling if there is a suspicion that migrant workers are being facilitated in illegal employment. In such cases, the identity of a foreign national, including their residence status, must be established for evidentiary purposes. The AVIM performs this task, as the Netherland Labour Authority does not supervise compliance with the Aliens Act (Wet arbeid vreemdelingen).

In investigations into labour exploitation, a reflection period may be offered to a potential victim who does not have legal residence in the Netherlands, in accordance with the B8/3 regulation in the Aliens Circular (Vreemdelingencirculaire). During the reflection period, the obligation to leave the Netherlands is suspended, and the victim can receive shelter and support. At the recommendation of the NLA, the AVIM submits this application to the IND using the M55 form and establishes the identity of the foreign national for this purpose. If, after the reflection period, the potential victim decides to file a report of labour exploitation with the NLA, contact is re-established with the AVIM to apply for a temporary residence permit, which grants the right of residence during the criminal proceedings.

21. What measures are in place to encourage victims of THB to report their situation to the authorities and/or civil society organisations?

Centre Against Child and Human Trafficking

For the past four years, (2021-2024) CKM, with the support of the National Police and the Ministry of Justice and Security, and in cooperation with the Police, Public Prosecution Service, the Judiciary and care actors has carried out a pilot project on raising victims' willingness to report THB and/or to cooperate with law enforcement in the justice process by removing barriers.

Five interventions were tested:

1. Deployment of a care and safety coordinator (inspired by UK victim navigators, but sitting with an NGO instead of the Police)
2. Detective-psychologists in cases involving vulnerable victims.
3. Working with specialized examining magistrates
4. Deployment of a survivor expert
5. Shortening terms and deadlines in the judicial process

Ministry of Justice and Security

The National Action Plan "Together Against Human Trafficking" includes several lines of action. One of these lines of action focuses on increasing the willingness to report incidents. This action line aims to improve access to information. Therefore, it is necessary for information about human trafficking to be available at a central location. It must be clear to victims where they can turn when they need help; citizens must know where to report signs of trafficking; and professionals must be able to find information that helps them assist others. It must be clear where reports of suspected human trafficking can be filed by victims, frontline professionals, and citizens. This is also in line with the recommendations made by GRETA and the proposal for a revised European Directive on human trafficking.

Reporting human trafficking is not usually an easy decision for victims. That is why we are working to increase victims' willingness to report incidents and to raise awareness among professionals involved in investigation and prosecution about the "no-punishment" principle and its implications in cases of criminal exploitation. In doing so, we are also focusing on better reaching and supporting victims to improve their willingness to report incidents.

Work is underway to establish a single central information hub on human trafficking where victims, frontline professionals, and members of the public can easily access information and be referred to the appropriate point of contact for questions regarding reporting crimes, assistance, and shelter. This information hub will serve as a reference for organizations involved in combating human trafficking. The central information hub will be
promoted through a communication strategy.

Efforts are also underway to explore ways to improve the willingness of victims of sexual exploitation and criminal exploitation to come forward. In addition, efforts are underway to raise awareness

among frontline law enforcement and prosecution officials about the possibility that a perpetrator may also be a victim, and to familiarize them with the concept of non-punishment, so that it can be applied in cases of criminal exploitation. Finally, efforts are also being made to increase the willingness of victims of labor exploitation to come forward and to improve the identification of victims and the protection of victims of labor exploitation.

22. What specific measures are taken in your country to detect/identify and refer to assistance possible victims of THB at the borders? What measures are taken in your country to identify victims of THB during the examination of asylum applications and prior to the return of persons whose applications are rejected?

Answer Ministry of Asylum and Migration

In the Netherlands, the identification of victims of human trafficking is embedded in both the asylum procedure and the return process. Because victims may be reluctant to disclose their experiences due to fear or shame, professionals throughout the migration system are required to remain alert to indicators of exploitation.

Upon registration in Ter Apel or at Schiphol Airport, asylum seekers are screened by the Koninklijke Marechaussee (KMar) or other relevant border and immigration authorities for indicators such as fraudulent documents, inconsistent travel narratives, or the presence of potential third-party control.

The Immigration and Naturalisation Service (IND) applies internal guidance (including WI 2021/16 on human trafficking in asylum cases). Case officers are trained to identify possible indicators of sexual or labour exploitation during interviews. Where trafficking-related elements are identified, these are assessed separately within the asylum procedure and may also trigger referral to relevant protection mechanisms.

During the asylum procedure, asylum seekers are accommodated in reception centres managed by the Central Agency for the Reception of Asylum Seekers (COA), in cooperation with organisations such as VluchtelingenWerk Nederland. Staff are trained to recognise potential indicators of exploitation and to refer concerns to competent authorities.

Prior to return interviews and departure procedures, the Dienst Terugkeer en Vertrek assesses vulnerability indicators. Where there are indications of human trafficking, cases are referred to AVIM or the KMar for further assessment, and return procedures may be suspended pending investigation.

When a potential victim of trafficking reports exploitation or when authorities identify relevant indicators, the individual may be granted a reflection period of up to three months under the Dutch B8 residence scheme. During this period, removal is suspended and the individual may access protection measures, including accommodation and support services.

Where voluntary return is considered, the Netherlands may cooperate with the International Organization for Migration (International Organization for Migration), which provides assistance with voluntary return and reintegration support.

Central Agency for the Reception of Asylum Seekers

The Central Agency for the Reception of Asylum Seekers (COA) is responsible for the reception and support of asylum seekers and refugees. All COA reception staff are offered a one-day training course on recognizing the signs of human trafficking and human smuggling. Each reception center

has one designated contact person for human trafficking and human smuggling, who has completed additional supplementary training.

An unaccompanied minor (UMA) aged 13 to 18 who is a victim of human trafficking and/or smuggling, or who is at risk of becoming a victim, is accommodated in protected reception. COA staff and Nidos guardians jointly assess whether the UMA faces an immediate risk and to what extent urgent placement in protected reception is necessary.

For adults: COA staff report signals via an internal reporting form. The signals are shared with the National Police and the Royal Netherlands Marechaussee.
The COA staff member ensures appropriate referral and support for the (potential) victim.
In the event of an acute situation, they also immediately notify the COA reception manager and the (local) police.

Royal Netherlands Marechaussee
Border guards from the Royal Netherlands Marcheaussee have been trained to conduct human trafficking screenings. They are able to identify specific or alarming signs that can indicate possible human trafficking in the front line, after which an informative interview can take place. If needed, they can identify a victim of human trafficking and offer them the so-called reflection period. The aim is to enable victims to recover a minimum of psychological stability and to allow them to make an informed decision on whether they want to co-operate with the competent authorities in the investigation and prosecution of traffickers. During this period, it is not possible to enforce expulsion orders against the presumed victims, thus guaranteeing them essential protection.

Furthermore, information on human trafficking can be found on KOWA, this is the internal online knowledge base for colleagues. There, they can find procedures and contactpersons for other agencies related to human trafficking.

23. What measures are taken in your country to identify victims of THB in immigration detention centres and prisons?
If a Dutch court issues a sentence or custodial measure, the Ministry of Justice and Security is responsible for the enforcement of that sentence or measure. This duty has been delegated to the Custodial Institutions Agency (Dienst Justitiële Inrichtingen, hereinafter DJI). DJI's most important task is realising the detention of convicted individuals in order to ensure that justice is served in order to ensure a safer society. In addition, DJI is responsible for the day-to-day care of the detainees and their rehabilitation.
Human trafficking may, in practice, intersect with the policy on continued criminal activity from detention (VCHD). If there are indications that a detainee is engaged in criminal activities from detention, including possible human trafficking, the DJI has various options for intervention. Depending on the case, measures can be taken, such as supervision measures, contact restrictions, or placement in a stricter regime. In addition, indications can be shared with relevant partners in the chain so that they can take further measures where necessary.

Pursuant to Article 5b of the Penitentiary Principles Act (PBW), the DJI does have a reporting protocol for identifying domestic violence and child abuse. If, during detention, signs are detected that indicate victimization or vulnerability, it stands to reason that these should be reported and, where necessary, shared with the designated authorities or partners in the chain. In addition, a detainee is, of course, free to seek help or file a report on their own if they are a victim of human trafficking.

The Rotterdam Detention Centre (DC) was built in 2010 to accommodate foreign nationals in detention. The facility can accommodate various groups depending on operational needs and capacity

demands within the Custodial Institutions Agency (DJI). Personnel are aware of the risks and indicators associated with human trafficking and are equipped to identify potential victims and take appropriate action. Cooperation with relevant partners enables concerns to be addressed and, where necessary, further assessment or follow-up to take place.

It is also important to prevent offenders from reoffending, both for the offender himself, but also to prevent repeated and new victims. Following the National Rapporteur's research[28] into offender profiles and discussions on offender repeat offending, specific actions have been formulated within the Action Plan in the joint approach to offenders. In Action line 1, which is focussed on creating broad awareness, one of the goals is to make probation workers more able to recognise human trafficking and know how to provide (potential) offenders of human trafficking with advice, supervision and counselling in a way that aligns more effectively with the approach to offenders. Therefore an e-learning has been developed in 2024 for probation officers for the purpose of increasing knowledge and skills in the field of human trafficking. In 2025 and 2026 this e-learning is to be used to train at least 250 probation officers. Furthermore, the Research and Data Centre (WODC) is currently doing research on the resocialisation of offenders. The results are expected to be published ....

24. What services are available in your country to provide specific assistance to particularly vulnerable victims, such as:

Ministries of Social Affairs and Employment and Health, Welfare and Sport

In general, the Dutch policy and support system is meant for every victim and takes into account the specific needs of these victims as far as possible. It is assumed that the Dutch policy on tackling human trafficking is broadly based and therefore covers all groups of victims of human trafficking. Within the general victim support policy, which guarantees assistance and support for victims of criminal offences, specific circumstances or support needs are taken into account as far as possible.

This means that the various support services for victims also take into account any specific circumstances, such as residence status. For example, under the Social Support Act 2015 (Wet maatschappelijke ondersteuning 2015) and the Youth Act (Jeugdwet), local authorities are responsible for providing appropriate shelter, support and aftercare for victims of human trafficking who are lawfully resident in the Netherlands, including, where applicable, homeless people or refugees who are lawfully resident in the Netherlands.

Support and assistance are tailored to the victim's individual circumstances and capabilities. Several services are available to trafficking victims including shelter, medical, social and psychological care, and legal counsel. The municipality's responsibility does not extend to third-country nationals without lawful residence in the Netherlands who are suspected of being victims of human trafficking.

For this specific group and their children, the Specialised Shelter for Victims of Human Trafficking (Categorale Opvang Slachtoffers Mensenhandel) provides a safe place of refuge and appropriate support for the victim during the reflection period of up to three months before reporting the crime. This includes drawing up a plan for the next steps, including further guidance and support aimed at recovery and/or return to the country of origin.

a. persons with disabilities;

CoMensha is the national coordination center against human trafficking. They advocate for the rights and interests of (potential) victims, including those with disabilities, and provide guidance through

[28] Brede blik op daderschap - achtergronden van daders van binnenlandse seksuele uitbuiting | Nationaal Rapporteur

complex procedures such as applying for residence permits, benefits, health insurance, and municipal registration. They also offer a help desk for direct assistance.

There are several organizations in the Netherlands which offer services to vulnerable victims including those with disabilities. One of them is the ARQ Centrum'45. This organization runs a program specifically for victims of human trafficking with psychological and psychiatric issues. They provide diagnostic assessments and specialized mental health treatment to support recovery and prevent revictimization. Also FIER Fier is a national expertise and treatment center for victims of human trafficking and other forms of violence. The CKM, part of Fier, focuses on research and support for victims, including those who may be overlooked or hard to reach, such as individuals with disabilities. Also ESSM offers support, information, and shelter for victims of human trafficking, including those with disabilities or from marginalized communities.

Also, The National Knowledge Center for Mild Intellectual Disabilities collaborates with more than fifty participants and other knowledge partners to develop practical knowledge about the support and treatment of people with mild intellectual disabilities. Their activities focus on the exchange of research, expertise, and practical experience. In this way, they work together to develop knowledge (products) for the effective support of people with mild intellectual disabilities. There are various groups, including the Project on Mild Intellectual Disabilities & Juvenile Delinquency and Parent Involvement.

b. LGBTI+ persons;

On December 10, 2025, the national government presented the Enhanced Approach to LGBTIQ+ Safety 2026–2029[29]. This document sets out three strategic goals: enhancing the personal safety of LGBTIQ+ individuals, increasing the focus on the safety of LGBTIQ+ individuals within government agencies, and establishing the safety of LGBTIQ+ individuals as a social norm.

Efforts to enhance safety in public spaces include developing a guide for law enforcement officers and examining the role that local governments and reporting systems can play in improving safety. Related to this is the effort to enhance safety within the home environment for the LGBTQ+ community by conducting research, addressing inappropriate behavior, and improving the situation for transgender individuals. Efforts are also being made to improve online safety, including identifying where this group can report threats, bullying, or stalking.

An important part of the approach is improving the safety of LGBTIQ+ individuals within government agencies and schools. This involves various organizations, including the police, the Public Prosecutor's Office, the Central Agency for the Reception of Asylum Seekers, the Immigration and Naturalization Service, and schools.

An important part of the approach is improving the safety of LGBTIQ+ individuals within government agencies and schools. This involves various organizations, including the police, the Public Prosecutor's Office, the Central Agency for the Reception of Asylum Seekers, the Immigration and Naturalization Service, and schools. Efforts include developing e-learning courses, raising awareness, and appointing specific individuals with knowledge of the target group.

Besides the government approach there is the Consortium on Sexual Exploitation of Boys and Young Men[30] is a collaboration between care and expert organizations Koraal, Fier, Lumens, Pretty Woman/Best Man, and Sterk Huis. In recent years, this Consortium has conducted research into the backgrounds and support needs of (potential) male victims. By allowing boys themselves to speak in the research about sexual exploitation and sexual violence—and what led up to it—insights have been

[29] Kamerbrief over versterkte aanpak lhbtiq veiligheid 2026 - 2029 | Rijksoverheid.nl
[30] Onderzoeksrapport Jongens aan het woord - Consortium seksuele uitbuiting jongens (1).pdf

gained into their unique life stories and needs. Based on this research and the organizations' practical experiences, work has been done to further develop care methodologies.

c. victims with children;

Victims with children can use the facilities which are available for all victims, such as shelters or support programs. For both the parent and the child specialised support is tailored to their needs. Most shelter places for adult men and/ or women are also equipped to help children. A specific child worker is focussed on the support for the child(ren). For example, some shelters have a children's playroom, a children's therapy room set up for play/child therapy, and a special kids' program that organizes activities and outings for children and their parents. If necessary, youth care is involved. Specifically for the parents there are also support programs both for themselves and also focused on parenting if necessary, including support for pregnant women. Some examples of these programs are focussed on pregnancy counseling, parenting and therapeutic programs, and child therapy.

d. victims with severe mental and physical trauma;

For victims with multiple problems (e.g. mental and physical trauma) there is a specific shelter: Shelter for Victims of Human Trafficking with Multiple Issues (OMM). At these shelter places specific attention and treatment for mental and physical trauma is arranged. Victims are always assessed for their individual needs. If necessary, victims can receive specific treatment for traumas or mental issues at the shelter or at a specialised mental health care and trauma institutions. Medical professionals can also be involved. In the other shelters there is also attention for the mental and physical needs of victims. Referral to specific trauma or medical care can be arranged if necessary.

e. homeless persons;

Ministry of Health, Welfare and Sport

Everyone has the right to a comfortable and affordable home. That is why, on December 5, 2022, the joint ministries of Health, Welfare and Sport (VWS), Social Affairs and Employment (SZW), and Interior Affairs presented the National Action Plan on Homelessness: A Home First. A total of 450 million euros is available annually to implement this plan. There are also other funding sources for issues such as housing (VRO) and poverty or debt (SZW). The plan aims to ensure that no one is homeless by 2030.

The Netherlands is also in discussions with other European countries regarding approaches to homelessness. By signing the Lisbon Declaration and participating in the European Platform on Combatting Homelessness, the Netherlands has committed itself to combating homelessness.

The 2023–2030 Action Plan on Homelessness[31] has six substantive action areas. Within these areas, initiatives are being developed on various topics to address homelessness.

- *Action Line 1:Strengthening Livelihood Security: Guaranteeing the Minimum Standard of Living*
  The main goal of Action Line 1 is to ensure that everyone has enough money to make ends meet. In the Homelessness Action Plan, we are collaborating on two programs aimed at improving people's financial security. These are led by the Ministry of Social Affairs and Employment (SZW): the "National Program on Poverty and Debt" and "Balanced Participation Act." These programs help improve the financial situation for many people in the Netherlands, especially those with lower incomes.

  Various initiatives are already being implemented. For example, measures to prevent people from falling into problematic debt. These include early detection of payment arrears or debts and informing people about income top-ups and assistance with financial concerns (such as from municipalities, volunteers, and Geldfit[32]). In addition, there are measures to improve

[31] Nationaal Actieplan Dakloosheid | Eerst een thuis
[32] Dé plek voor al je vragen en zorgen over geld

debt counseling and to give professionals more flexibility in their work, so they can better tailor their support to the personal circumstances of those seeking help.

- *Action Line 2: Prevention: Preventing homelessness is always best*
  The main goal of the National Action Plan is to ensure that no one becomes homeless (prevention), but also to help people who are already homeless (recovery support). In this way, a robust system for early detection of problems and for providing various types of assistance will be established.

  This starts with providing accurate information and legal protection, improving coordination between the medical and social sectors, offering support to those in need, and fostering a strong social foundation. It's also about ensuring people have access to the facilities and services they need and that they receive the help they require.

  It is important to be able to intervene as early as possible to prevent problems from getting worse. To this end, there is being invested in proactive care and outreach support in the neighborhood.

- *Action Line 3: Housing First: A Place to Call Home for Everyone, with Tailored Support*
  The goal is for everyone to have a permanent place to live or to receive help in finding a place where they feel at home, with tailored support if needed.

  To implement the "Housing First" concept, there must be sufficient affordable housing. In the National Action Plan on Homelessness, the Ministry of Health, Welfare, and Sport (VWS) is collaborating with the Ministry of Housing, Spatial Planning, and the Environment (VRO) and all other parties involved in construction and housing plans. The "A Home for Everyone" program is a key component of the National Housing and Construction Agenda and is closely linked to the National Action Plan on Homelessness. The goal of this program is to ensure there are enough housing units that are affordable for all groups requiring special attention, including homeless people. These housing units must be allocated fairly among municipalities, and the appropriate care, assistance, and support must be provided.

  Through "A Home for Everyone," the government is taking a more proactive role. Municipalities must develop plans for housing and care and coordinate these efforts regionally. They must also ensure that homeless people leaving shelters are given priority when housing is allocated. See also A Home for Everyone.

  The number of homeless people receiving housing assistance is tracked. This data is compiled in an overview being developed by the Ministry of the Interior in collaboration with other organizations, such as IPO, VNG, and Aedes. This overview shows how many housing units have been allocated to each group.

- *Action Line 4: Strengthening Implementation Practices: Focus on Leadership, Speed, and a Human Approach*
  To reduce homelessness, it is crucial that there be effective collaboration among all parties involved in addressing homelessness—at the national, regional, and local levels.

  It is the responsibility of ministries, public service providers, local and regional governments, regulatory bodies, and policymakers to ensure that public services meet people's needs. This is not always achieved yet. That is why a key action line of the National Action Plan is to improve this. There is virtually no situation in which more sectors intersect than when someone becomes homeless. After all, providing faster and better cross-sectoral services to

people who are homeless or at risk of homelessness is not just about housing, but also about having a mailing address, access to healthcare, resolving debt, social participation, and well-being. It is not about just one issue. The ability—and the need—to offer these services simultaneously and through a single point of contact can and must be significantly improved. To gain insight into what is already working well and where improvements are possible, the Ministry of Health, Welfare, and Sport commissioned a study of a sample of six municipalities titled "Strengthening the Implementation of the Approach to Homelessness: Getting the Basics in Order Quickly."

Agencies involved in safety, health, and well-being, for example, must also collaborate effectively. The goal is for those directly involved in implementation to be able to provide rapid and comprehensive support based on people's specific needs.

- *Action Line 5: Knowledge through lived experience: No Policy Without Practical Knowledge*
The goal is to incorporate the knowledge people have gained from their own lived experiences with homelessness throughout the entire policy-making process. This means utilizing lived experience knowledge not only when developing policies but also to evaluate whether those policies are actually effective, at both the local and national levels, and also in adjusting the policiesThis knowledge is deemed necessary in durably and effectively helping and assisting people who suffer homelessness or are at risk of homelessness.

  In 2019, the Ministry of Health, Welfare, and Sport (VWS) established the Youth Panel "de Derde Kamer." This panel provides both solicited and unsolicited advice to the VWS, SZW, and BZK ministries on youth homelessness. The Youth Panel consists of young people who have personally experienced homelessness. These young people also contributed to the development of the National Homelessness Action Plan.

  In 2019, with financial support of the Department of Health, Welfare and Sport (VWS), the Jongerenpanel (Youth Panel) De Derde Kamer (The Third Chamber, with reference to the Dutch parliament, consisting of the First and Second chambers). This panel provides both solicited and unsolicited advice to the VWS, SZW, and BZK ministries on combatting and preventing youth homelessness, and consists of young people – ages 18 to 27 – who have personally experienced homelessness. Members of the panel have contributed in de process of the development of the National Actionplan Homelessness in 2022.Also in 2022, several organizations joined forces to form the SamenThuis2030 Coalition. The Youth Panel is part of this group. This coalition is committed to ensuring that by 2030, there will be no more homeless youth in the Netherlands. In addition, in 2022, several organizations joined forces with the support of Kansfonds to form "A Home for All Youth."

  In 2023 the national coalition Dakloosheid Voorbij! – a collaboration of local advocacy organizations – was formed with financial support from the Ministry of Health, Welfare, and Sport (VWS) Its goal is to prevent and end homelessness and hold state and local actors accountable for policies to reach the goal of ending homelessness in 2030, as agreed to in the National Homelessness Action Plan and the Lisbon Declaration on ending homelessness from 2021. "Dakloosheid Voorbij!" gives a voice to homeless people aged 27 and older. They share knowledge and experiences with one another to strengthen their organizations and local collective advocacy efforts. They also develop training programs for policymakers on meaningful participation. In addition, they have a panel of experts by experience aged 27 and older (Recht op een Thuis – Right to Housing).

- *Action Line 6: Inclusive Approach to Youth, LGBTIQ+ Individuals, and EU Citizens*

The Homelessness Action Plan also focuses on groups that are in an especially vulnerable position, such as young people at risk of becoming homeless, homeless LGBTIQ+ individuals, and homeless EU citizens. Throughout the duration of the Action Plan, we sometimes identify new groups that need additional assistance. Our goal is to redouble our efforts for these groups and to provide adequate support to those in particularly vulnerable situations when the standard approach is insufficient for them.

Young People: It is important to continue to pay specific attention to the needs of this group, especially given the stage of life they are in. In preventing youth homelessness, it is important to focus on the transition from age 18 to 18+, providing accurate information, and the role of education. When it comes to preventing youth homelessness, it is important to focus on the transition from age 18 to 18+, providing accurate information, and the role of education.

LHBTIQ+: In June 2023, a brainstorming session was organized with practitioners, people with lived experience, policymakers, and researchers to discuss LGBTIQ+ issues in relation to homelessness. During this session, a great deal of input was gathered, which the parties involved will use to guide their work in the coming period. It became clear, for example, that shelters for LGBTIQ+ people who are homeless are not always safe and that there is a need for training for social workers to enable them to better support LGBTIQ+ individuals. The plan is to stay in touch with the attendees in the future so they can continue to support one another with their knowledge and expertise as they develop follow-up actions.

The Valente shelter organization has developed an LGBTQI+ handbook[33] intended for organizations that provide social services. Further more, research[34] has been conducted by Movisie to LGBTQI+ homeless people.

Homeless Labour Migrants: In the Netherlands, there are homeless EU citizens who find themselves in difficult situations. The temporary shelter measures implemented during the COVID-19 lockdown, in particular, made it clear that this group needed additional assistance. For this reason, the Action Plan for Vulnerable Homeless EU Citizens[35] was launched in September 2022. This plan builds on the Roemer Report, which focuses on improving the situation of migrant workers in general and reducing abuses. The Action Plan focuses specifically on homeless EU citizens and aims to ensure that cities and relevant organizations better identify, prevent, and address homelessness among vulnerable EU citizens. See also “Managing Labor Migration Effectively.”

In 2023, the government made an additional €65 million available on a structural basis to address homelessness. Of these funds, €7 million was allocated to a pilot program providing temporary shelter for homeless EU citizens who are not eligible for equal treatment. [36]Six municipalities (Amsterdam, Rotterdam, Utrecht, The Hague, Eindhoven, and Venlo) are offering short-term shelter in this pilot program to non-entitled homeless EU citizens. This short-term shelter is aimed at providing support to help them return to work or to their country of origin.

In 2024, an evaluation study was conducted in the six pilot municipalities[37]. The results of this evaluation are positive. The combination of support services and guidance, focused on

[33] Handboek LHBTQI+ met KPI's (met woordenlijst als bijlage)
[34] Van uitsluiting naar uitzicht: lhbtiqa+ dak- en thuisloze personen | Movisie
[35] Maatschappelijke Opvang | Tweede Kamer der Staten-Generaal
[36] Checklist gelijke behandeling EU-burgers | Arbeidsmigratie in goede banen
[37] Evaluatie kortdurende opvang dakloze EU-burgers | Rijksoverheid.nl

activation and participation, is having an impact. In May 2026, it was announced that eight additional cities would begin providing assistance and shelter to homeless EU citizens: Almere, Arnhem, Bergen op Zoom, Den Bosch/Oss, Groningen, Leiden, Nijmegen, and Tilburg. This brings the total to 14 cities that assist homeless EU citizens who are not entitled to a spot in regular shelters.[38]

In light of this positive evaluation, we will continue to provide shelter for non-entitled homeless EU citizens. We will do this jointly for the next three years (2026 through 2028) with a total of €13 million per year: €8 million from the Ministry of Social Affairs and Employment (SZW) and €5 million from the Ministry of Health, Welfare, and Sport (VWS) which is part of the total budget of the National Action Plan. In addition to continuing the pilot programs, we are committed to preventing EU migrant workers from becoming homeless[39]. We will do this by placing greater emphasis on prevention, for example by assigning more responsibilities to employers and, if necessary, amending relevant legislation. In June 2025, a public-private partnership was launched under the name
"Work in NL Alliance." Within this alliance, the ministries work together with employer organizations to provide assistance and support to migrant workers. This includes helping them transition from one job to another, organizing temporary housing, and arranging language training. This will primarily be handled by the Ministry of Social Affairs and Employment (SZW).

f. other.

25. How do you support the (re)integration of victims of THB? What processes are in place in your country to provide assistance to victims of THB exploited abroad after their return?

Ministries of Asylum and Migration and Health, Welfare and Sport
When Dutch nationals or individuals with permanent residence status abroad become victims of human trafficking, they are entitled to protection and support upon return to the Netherlands. The system is designed to ensure that returnees can access general victim support services and specialised assistance where necessary.

Dutch embassies and consulates may provide consular assistance to victims abroad, including emergency travel documents and liaison with Dutch authorities. In some cases, coordination takes place with relevant authorities to facilitate safe return.

Upon arrival in the Netherlands, border authorities such as the Koninklijke Marechaussee (KMar) may be involved in initial reception procedures where specific risks have been identified.

After return, victims are generally referred into the national victim support system. Coordination and registration of (presumed) victims of human trafficking is carried out within the Dutch victim support framework, including organisations such as CoMensha and care coordinators.

Victims are assessed for their individual needs, including safety, housing, medical care, and psychosocial support.

As Dutch nationals or lawful residents, returnees have access to the general social welfare system, including healthcare, municipal support services, and income support where applicable under the Participation Act (Participatiewet).

[38] Meer steden bieden hulp en opvang aan dakloze EU-burgers | Arbeidsmigratie in goede banen
[39] https://www.tweedekamer.nl/kamerstukken/brieven_regering/detail?id=2022Z16818&did=2022D35386

Where necessary, victims may be referred to specialised shelters for victims of human trafficking and other forms of serious exploitation.

Medical and psychological care is provided through the regular healthcare system, often supplemented by specialised trauma services.

Legal assistance is available through the system of subsidised legal aid, and victims may choose to report offences to the police. Investigations into human trafficking cases are carried out by specialised police units and may involve international cooperation between law enforcement authorities where relevant.

Municipalities play a key role in reintegration by supporting registration in the Personal Records Database (BRP), access to housing, and social benefits where applicable. Besides shelters and intramural support, outpatient care is available for Dutch nationals to support the victim with the reintegration. Support is provided on an individual basis depending on vulnerability and local capacity.

26. If there is a provision in your country's law that provides for the possibility of issuing a residence permit owing to the victim's personal situation, how is this interpreted in practice? Please provide examples.

Ministry of Asylum and Migration

In Dutch migration law, protection for victims of human trafficking is provided under the residence scheme for victims and witnesses of human trafficking (B8 scheme). In certain cases, residence may also be granted on humanitarian grounds where strict requirements cannot be met due to the individual circumstances of the victim.

While cooperation with criminal investigations (such as reporting or providing statements) is generally an important element of the scheme, exceptions may apply where such cooperation is not reasonably possible due to the personal situation of the victim.

In practice, the Immigration and Naturalisation Service (IND) assesses such cases on an individual basis, taking into account factors such as vulnerability, trauma, and safety risks.

Where a victim suffers from severe trauma or medical conditions that make participation in investigative or judicial processes disproportionately harmful, this may be taken into account in the assessment of residence eligibility. Medical reports from qualified professionals, such as forensic psychiatrists or psychologists (e.g. Nederlands Instituut voor Forensische Psychiatrie en Psychologie), may support the application.

Where cooperation with authorities may lead to a credible risk of retaliation against the victim or their family, this may be considered in the overall assessment of protection needs. Such risks are assessed on an individual basis by the competent authorities.
In the case of unaccompanied minors, the principle of the best interests of the child is a primary consideration in all immigration decisions. Their age, dependency, and vulnerability are central factors in determining appropriate protection measures.

The IND makes its decision on the basis of all available evidence, including medical documentation, police reports, and information from specialised support organisations such as FairWork and CoMensha. The assessment is individualised and case-specific, based on humanitarian and protection considerations within the Dutch migration framework.

27. What measures are in place to ensure that the identity, or details allowing the identification, of a child victim of trafficking are not made publicly known?

Answer Public Prosecutors

Since July 1th 2025, the *Besluit bescherming slachtoffergegevens in processtukken* went into effect. This decree stipulates that law enforcement officials, apart from name and date of birth, no longer include other personal data in the official report/police report that can harm the privacy of victims. This includes address, place of residence, phone number, email address, country and place of birth and personal security number.

This data will also no longer be included in other case, court of legal documents, unless this information is relevant for the criminal proceeding and decision by a judge, according to the public prosecutor.

This will benefit all victims, not only minors.

Furthermore, in the public prosecutors directive on THB, measures are explained as to how victims can be protected during criminal proceedings, for example avoidance of visual contact between victim and suspect. The public prosecutor can propose to question the victim in private, without the suspect present, and with use of modern technology such as using a video-link, of pre-recording the accusations of the victim and using these recordings in criminal proceedings.

Other alternatives that are possible in the Netherlands are interrogation by the examining magistrate/ investigating judge, use of taped testimony in court or testimony by the investigative officers who interviewed the victim. After a court case the judgment is anonymized.

28. What measures are in place aimed at encouraging the media to protect the private life and identity of victims?

The Council for the Judiciary

Since 1 July 2025, the new Article 149a paragraphs 3 and 6 of the Code of Criminal Procedure (Sv) and the accompanying Decree on the Protection of Victim Data *(Stb. 2025, 162)* have come into effect. As a result, certain victim data will be left out of casefiles if they are not relevant to the criminal proceedings. For situations where a judge needs those data for his or her decision, cooperation agreements have been made between the Public Prosecution Service and the Judiciary. This applies to all victims, not specifically victims of human trafficking.

In principle, parties to the proceedings are not recorded, either in visually or audibly, unless permission is granted. For example the media must always request permission to record a victim's statement. A victim can also ask the judge not to disclose their name. Furthermore, in certain cases, a number is used to identify the victim instead of their name.

The *Judiciary's Press Guidelines* (2025) inform journalists about the cooperation they can expect from the courts and the rules that apply to journalists in court buildings. These rules relate to statutory exceptions to the principle of openness, as well as to the interests of persons involved in hearings and rulings, including victims. Victims often have an interest in protecting their privacy. In addition, the press frequently uses digital means to report on court cases. These digital images and recordings can be widely disseminated and remain accessible for a long time, which can be harmful to those involved. Therefore, restrictions on reporting from the courtroom are unavoidable. It is up to the judge to determine, on a case-by-case basis, whether and to what extent compelling

circumstances require limitations on openness. No recordings may be made of victims unless they give explicit permission. This also applies to recording victim statements.

Accredited journalists can usually receive information about cases being heard in public from the courts one week before the hearing. This information is subject to an embargo until the case is publicly heard. Journalists who wish to access this protected information agree to respect the privacy of those involved.

The Judiciary expects the press to comply with the professional codes of conduct, the rules in these Press Guidelines, and any agreements or conditions set with the communications department or the judge during the hearing.

The *Guide of the Council for the Journalism* states in section 2.4.1: 'A journalist shall not infringe on the privacy of individuals beyond what is reasonably necessary within the context of their reporting.' And in section 2.4.7: 'In publications about (criminal cases involving) serious crimes, details of the crime should be omitted if it is foreseeable that they will cause additional suffering to the victim or their close relatives and if the details are not necessary to convey the nature and severity of the crime or its consequences.' Since 2024, there is also a special guide (and platform) for journalists working with victims: *Victims in the Media – Victims in the Media.*

29. Have there been cases of diplomatic households (of your country's diplomats abroad and of foreign diplomats in your country) employing domestic staff in conditions which could be forced labour or human trafficking? If yes, how was the issue of diplomatic immunity addressed? How were the victims identified, assisted and protected?

Yes, Between January 2020 and October 2025, eleven domestic workers employed by diplomats at an embassy or international organization in The Hague reported instances of exploitation. Six of the migrants are from the Philippines; the others are from Indonesia, Malaysia, Algeria, Senegal, and Spain.

Following a report of exploitation, the first step is to inform the individual of the option to file a police report and to refer them to organizations such as FairWork, which can provide further assistance to the alleged victim. In addition, each case is reviewed to determine whether further mediation through the Ministry of Foreign Affairs is necessary and feasible. If so, a meeting may be arranged with the diplomatic mission, international organization, or diplomat in question. In cases of abuse, diplomats were not permitted to hire a new domestic worker.

On July 1, 2024, the Ministry of Foreign Affairs tightened its policy. The option to hire new private staff (i.e. private servants) by diplomats has since been discontinued. There are currently 28 private staff members (private servants) on the payroll, a number that will decrease in the coming years as a result of the revised policy. Furthermore, there are three international organizations that have an explicit right to private staff, as this is stipulated in the headquarters agreement. Private Servants have periodical meetings – upon each renewal of their ID-card, with the ministry and are informed of their rights in the Netherlands. The ministry amongst others verifies whether salary of the private servant was deposited in full and on time into their own bank account. Where possible, the Netherlands further seeks to determine whether this group is a victim of exploitation and to verify their employer's compliance with Dutch (labour)laws and regulations. The Ministry of Foreign Affairs is actively addressing non-compliance with the employers of those involved.

30. What specific steps are taken in your country to identify victims of THB amongst persons recruited and exploited by terrorist/armed groups?

In the Netherlands, there are only a few known cases of Dutch citizens who have joined a terrorist organization and returned to the Netherlands. The Netherlands does not have an active repatriation

policy under which returnees are prosecuted and reintegrated in the Netherlands. If a person who travelled abroad returns on their own initiative, that person will be prosecuted for participation in a terrorist organization. After serving their sentence, a distinction must be made between individuals whose Dutch citizenship or residence permit has been revoked and those whose have not. The latter group will be subject to the regular release process and fall under the regular probation system, whereas this is not the case for the former group. It is important to note that a tailored approach appropriate to the individual is always taken.

31. Are there requirements in your country's legal framework for the detection and removal of THB-related Internet content, and what are the sanctions for non-compliance? Is there a code of conduct for providers? If a person is detected as a presumed victim of THB in the process, how is this person referred to assistance?

Ministry of Justice and Security

Insofar as THB-related content qualifies as illegal online content and has been posted on an intermediary service to which the Digital Services Act (DSA) applies, it can be reported to the relevant hosting service or online platform. Under the DSA, hosting services and online platforms are required to take action once they have been notified of the presence of illegal online content on their service. If they fail to do so, they cannot invoke the liability exemption that they are afforded under the DSA. With the introduction of the DSA, a longstanding Dutch practice has been codified in EU legislation and regulation. Before the DSA, there was already the Notice-and-Take-Down (NTD) Code of Conduct. It still exists and is aligned with the DSA. The code of conduct sets out principles and standards for handling reports of illegal online content in practice. The police can make use of the NTD-procedure to report criminal online content. If such a report does not have the desired effect, the Public Prosecutor may, in specific cases and subject to conditions, issue a binding order, after authorization by the investigating judge, to render the online content inaccessible (article 125p of the Dutch Code of Criminal Procedure).

Besides this, sex work is a legal profession in the Netherlands, and sex ad platforms are a means for sex workers to carry out their work. It is important that any abuses on these ad platforms be addressed. Therefore, following a commitment made to the House of Representatives, the Ministry of Justice and Security, together with the police and the Public Prosecution Service, is in the process of initiating discussions with Dutch ad platforms. The initial discussions have taken place and, in consultation with the advertising platforms, have led to the following concrete measures:

- Verifying valid identification documents of sexworkers advertising on their platforms;

- Barring advertisers who are non-EU nationals, who offer in-person sex work, and who cannot prove that they are authorized to work in the Netherlands.

- This information will be actively communicated to all current and new advertisers.

h. INVESTIGATION, PROSECUTION, SANCTIONS AND MEASURES (Articles 4, 18, 19, 23, 24, 27, 28 and 30)

32. Is the abuse of a position of vulnerability part of the human trafficking offence in your country's law? How are the concepts of "vulnerability" and "abuse of a position of vulnerability" defined in law? Have they been subject to judicial interpretation? If yes, please provide relevant case-law.

Council for the Judiciary

The Dutch criminal provision (Section 273f of the Criminal Code) sets out a considerable number of coercive measures. These coercive measures are largely derived from (well-known) international regulations, including the 2005 Council of Europe Convention on Action against Trafficking in Human Beings and Directive 2011/36/EU and its revision, and are furthermore based on earlier national legislation and case law.

In practice, there are hard and soft coercive measures which, in substance, lead to the same result, namely that of involuntary nature. Abuse of a position of vulnerability is classified as a soft coercive measure. In addition, the Dutch legislation recognises the (also soft) means of coercion: abuse of a position of dominance arising from objective circumstances. The difference between the two means of coercion is that the vulnerable position relates more to the personal characteristics of the victim, whereas the means of coercion arising from factual circumstances relates more to the (unequal) relationship between perpetrator and victim. Both means of coercion are, however, also used interchangeably and there are certainly overlaps.

There appears to be a tendency in human trafficking cases for soft means of coercion to occur more frequently than so-called hard means of coercion, as the former are better suited to the often complex relationship between perpetrator and victim.

Public Prosecutors Office

Yes. The abuse of a position of vulnerability is explicitly included in the offence of trafficking in human beings under Article 273f, paragraph 1 (subsection 1) and paragraph 6 of the Dutch Criminal Code. Paragraph 6 specifies that a “position of vulnerability” includes a situation in which a person has no real or acceptable alternative but to submit to the abuse.

Following the adoption of the Act on the Modernization and Extension of the Criminalization of Human Trafficking (*Wet modernisering en uitbreiding strafbaarstelling mensenhandel, Stb. 2023, 123*)—foreseen End of 2026—the legal definition of vulnerability has been broadened. It now also covers situations where victims are only partially able or in a diminished position to resist or counteract abuse. This expansion better reflects the complex realities of exploitation and recognizes that human trafficking often involves gradual processes of dependency and diminished autonomy rather than total coercion.

Under the amended provisions, certain categories are presumptively deemed vulnerable, including migrant workers, minors, persons under 21 engaged in prostitution, and victims with intellectual disabilities, mental health conditions, undocumented residence, prior trauma, or severe indebtedness. The reform represents a new prosecutorial and judicial approach, allowing courts to infer abuse of vulnerability from the factual context and the nature of exploitation itself—rather than requiring explicit evidence abuse (which requires a guilty mind).

Dutch jurisprudence has consistently treated vulnerability as a factual and contextual concept, often overlapping with “abuse of a position of factual dominance.” Examples include:

- ECLI:NL:RBMNE:2023:4564 (undocumented foreign victims);
- ECLI:NL:GHSHE:2025:2866 (mild intellectual disability and PTSD);
- ECLI:NL:RBAMS:2014:7911 (multiple vulnerabilities including addiction, homelessness, and emotional dependence);
- ECLI:NL:GHSHE:2024:3506 (financial vulnerability due to serious debt);
- ECLI:NL:GHDHA:2019:317 (vulnerability arising from addiction and indebtedness).

The Legal Opinion of the Prosecutor General (ECLI:NL:PHR:2022:378) and the Parliamentary Papers (*Kamerstukken II, 2011/12, 33 309, nos. 3 and 14–16*) confirm that both the Public Prosecution

Service and the judiciary may determine the existence of a position of vulnerability on the basis of all personal, situational and socio-economic factors.

In essence, under the new legislative framework, vulnerability is no longer confined to absolute helplessness but also encompasses reduced capacity to resist exploitation, providing Dutch authorities with a more nuanced and effective basis for identifying and prosecuting trafficking offences.

33. Is the special vulnerability of the victim considered as an aggravating factor for the offender's sentence?

Public Prosecutors Office

Yes. In the Dutch Prosecutorial Guideline THB, it is considered as an aggravating factor. It includes the circumstance that the crime is committed by two or more perpetrators, the victim is younger than 18 years old or there is abuse of special vulnerability of the victim

34. According to national case-law, what forms of vulnerability are mostly abused by offenders in human trafficking cases? Please provide specific examples that show how the concept of “abuse of a position of vulnerability” is used in practice. What are the challenges in its application? Is it sufficient to prove the existence of a position of vulnerability of the victim, or must it also be proven that the defendant knew or should have known of the victim’s vulnerability, and intentionally manipulated the victim on this basis?

Public Prosecutors Office

See also the draft answer on Question 32.

According to national case-law, offenders mostly exploit personal, situational and structural factors that increase a person’s susceptibility to trafficking, such as irregular or insecure residence status, young age, intellectual or psychological limitations, addiction, indebtedness, homelessness and cumulative social and economic problems. These factors often coexist and place victims in a situation where they lack a real or acceptable alternative and are unable, or only to a reduced extent able, to resist or withdraw from exploitation.

Dutch courts apply “abuse of a position of vulnerability” as a fact-specific “means” element, often in conjunction with “abuse of power”. This is illustrated by case-law concerning undocumented foreign victims (e.g. ECLI:NL:RBMNE:2023:4564), victims with intellectual disabilities and PTSD (e.g. ECLI:NL:GHSHE:2025:2866), and victims whose vulnerabilities stem from severe debts, addictions, homelessness or emotional dependence (e.g. ECLI:NL:RBAMS:2014:7911; ECLI:NL:GHSHE:2024:3506; ECLI:NL:GHDHA:2019:317).

As regards the mental element, it is not sufficient to establish only the existence of a vulnerable situation: the Supreme Court requires proof that the defendant was aware of, or at least consciously accepted the substantial risk of, the factual circumstances from which the vulnerable position arises (conditional intent), and that he took advantage of that vulnerability as the “means” to commit the trafficking act, in addition to the separate specific intent to exploit (HR 27 October 2009, ECLI:NL:HR:2009:BI7099).

Council for the Judiciary

The following aspects are frequently involved: vulnerabilities relating to residence status, dependence on drugs, lack of income and housing, psychological vulnerability, and relational dependence on the perpetrator. In virtually all cases, there is little dispute as to whether a vulnerable position exists. The essential question is whether the extent of the abuse is such that it restricts the victim’s free will to such an extent that there is no longer any real choice. In other words, that there is reasonably no

alternative but to endure the abuse. That assessment depends to a large extent on the facts and circumstances of the case in question.

It is not sufficient that a vulnerable position simply exists. The perpetrator must be aware of that vulnerability. That (legal) threshold is not high, as it is essentially only that the perpetrator could reasonably have been aware of that vulnerability. In cases where the perpetrator has been responsible for creating that vulnerability, this is undoubtedly the case. In other cases, it is usually clear that the perpetrator was aware of that vulnerability and exploited it. This can often be established through statements made by the perpetrator about the victim: for example, via WhatsApp messages, telephone taps, email messages and (supporting) witness evidence. The latter often provided by people close to the victim. It is also important whether or not the victim is a minor; this carries significant weight.

The perpetrator's intent lies in the actions taken in relation to the victim. Ultimately, it is often the intention to exploit the victim that is the crucial issue, rather than the victim's vulnerable position.

35. Is the concept of "abuse of a position of vulnerability" addressed in criminal justice training? Is there any specific guidance on applying this concept? Please provide copies of guidance and/or training materials that shed light on how this concept should be applied in practice.

Council for the Judiciary

The SSR, the training institute for the Judiciary and the Public Prosecution Service, offers several courses each year on human trafficking. These courses come in two formats: a course for staff of the Public Prosecution Service, focusing on, amongst other things, identifying potential victims of human trafficking; and a three-day training programme on human trafficking for members of the Public Prosecution Service and the Judiciary who handle human trafficking cases. Both courses cover the coercive measure of 'abuse of a vulnerable position' as well as other coercive measures; the human trafficking module covers this in great detail, including references to case law. Participants are also presented with relevant legal questions based on specific case studies.

36. What procedures and measures exist in your country to take into account the specific needs of vulnerable victims at the different stages of criminal proceedings?

Council for the Judiciary

Victims of serious sexual or violent crime are eligible for free legal aid irrespective of their ability to pay, if the case in question has been prosecuted. Other arrangements: for certain crimes, the victim can request a conversation with the public prosecutor. Furthermore, there are courses and directives for judges on how to deal with vulnerable witnesses, aimed to prevent secondary victimisation. There are also facilities in courts, like special rooms for victims.
Minor victims are rarely heard as witness in court, they are usually heard by police or in the examining magistrate's office. At the police office, more serious suspicions are interrogated by specialized officers in special rooms. Only in exceptional cases during the interrogation is this done by the examining magistrate. At a hearing, a minor victim has broadly the same rights as an adult victim. In very special cases, adjustments are made. In criminal cases, the hearings of child witnesses are often recorded, so that children only need to be heard once. Minors should be interviewed by trained personnel. Some child-friendly information of proceedings in general is available on www.rechtvoorjou.nl.

Directives for judges on how to interact with individuals with light intellectual impairments, as well as courses on how to recognize intellectual impairments and psychotic problems, and how to treat these individuals adequately. Other arrangements: sign language interpreter, writing interpreter, wheelchair accessible courts.

Victims and relatives of victims also have the right to a free interpreter if they do not have sufficient or no command of the Dutch language. Sworn interpreters will be used.

Public Prosecutors Office

In the Netherlands, there are various minimum standards for the rights, support, and protection of victims, specifically tailored to meet the needs of vulnerable individuals at different stages of criminal proceedings. Special attention is given to certain victim groups:

- Minor Victims (<18 years): Special care is taken for minor victims due to their physical and psychological vulnerability. Given the particularly vulnerable position of minors, in most cases, the victim's statement is recorded on audiovisual media. Furthermore, efforts are made to ensure that the same (certified) investigators conduct the interviews in a specialized interrogation room. Moreover, except in exceptional circumstances, minors are allowed to be accompanied by a representative of their choice during the process. If the victim is under 12 years old, the interview takes place in a child-friendly studio;
- Victims with Specific Needs: For victims who have specific needs, such as individuals with disabilities, mental disorders, or psychological conditions (whether caused by the incident or not), similar measures are considered. It is not uncommon for victims to be adults but with intellectual disabilities, in which case these special provisions can significantly enhance the well-being of the victim and improve the quality and reliability of the testimony;
- Protective Measures Post-Conviction: To prevent convicted human traffickers from re-establishing contact with their victims after their release from detention, the court can impose contact and area bans. This measure ensures further protection for vulnerable victims following the conclusion of the legal process.

These measures reflect the Dutch commitment to ensuring that the specific needs of vulnerable victims are carefully considered, from the investigation stage through to the post-conviction phase, ensuring both their protection and their dignity throughout the criminal justice process.

37. If you have criminalised the use of services of a victim of THB, how is this provision applied in practice? Please provide any relevant case-law.

Public Prosecutors Office

In the Netherlands, various legal provisions address the use of services of a victim of trafficking in human beings, commonly referred to as the "client approach." This is part of the broader strategy to combat human trafficking and its exploitation, specifically targeting those who seek sexual services from victims of trafficking.

One of the key provisions is Article 273g of the Dutch Penal Code, which specifically criminalizes the act of engaging in sexual acts with someone, when the individual knows or has serious reason to suspect, that the person is being exploited for sexual acts with a third party in the context of human trafficking. This provision is designed to penalize clients who exploit victims in such situations, with a maximum prison sentence of up to four years or a fine of the fourth category. If the victim is under the age of 18, the sentence can be increased, with the penalty reaching up to six years in prison or the same fine.

In addition to Article 273g, there are provisions within the sexual offenses legislation that further target clients of minors involved in prostitution. Specifically:

- Article 246(1)(d) (formerly Article 248b) criminalizes engaging in sexual acts with a minor between the ages of 16 and 18 when the minor has made themselves available for sexual acts

with a third party in exchange for payment. The penalty for such an offense can be a prison sentence of up to nine years or a fine of the fifth category;
- Article 245(1)(d) (formerly Article 248b) similarly criminalizes sexual acts with a minor between the ages of 16 and 18 when they are engaged in sexual acts for payment, with penalties including up to six years in prison or a fine of the fourth category;
- Article 254(1)(e) provides for an increased sentence in cases where a child under 16 years old is involved, with a penalty increase of up to three years for offenses described in Articles 247-250 when the victim is a child available for sexual acts for payment.

These articles make it clear that the use of services from victims of THB, including minors, is criminalized, and the law aims to hold those who exploit such individuals accountable, regardless of whether the clients were actively seeking out minors. The age of the victim is objectified in this context. The actual age of the victim, as stated in their passport, is the age that counts.

A significant recent case illustrates the application of these provisions (ECLI:NL:RBZWB:2025:8741 e.a.). On December 11, 2025, the Court of Zeeland-West-Brabant convicted two men and one woman for the sexual exploitation of three girls, two of whom were minors. Between 2021 and 2023, the girls had engaged in paid sex. Eight of their clients were also convicted under the old Article 248b for engaging in sexual acts with a minor for payment. These clients received penalties, including community service (up to 240 hours) and a day of unconditional imprisonment, along with financial compensation ranging between 500 and 750 euros. The court ruled that while the clients had not specifically sought out a minor sex worker, they failed to adequately check the victims' actual age, which led to their conviction.

However, the application of Article 273g has been challenging in practice, especially due to its requirement of intent or suspicion. The law states that the client must either know or have serious reason to suspect that the individual is a victim of human trafficking. The Explanatory Memorandum to this article highlights the importance of identifying signs of trafficking victimization. The evidence burden is therefore quite high, as it is not always easy to prove that the client had sufficient knowledge or reason to suspect the victim’s status as a trafficking victim.

In conclusion, the Dutch legal system takes a comprehensive approach to criminalizing the use of services of trafficking victims, particularly focusing on clients who engage with minors or knowingly exploit victims. However, as evidenced by the cases mentioned, the application of these provisions can be complex, especially when it comes to proving the client's knowledge or suspicion of human trafficking, which can make the process of securing convictions more challenging.

38. What technology-based tools and initiatives exist in your country to support investigations and enhance prosecution of THB cases? What training is provided to law enforcement officials, prosecutors and judges on THB facilitated by information and communication technology?

Council for the Judiciary

In addition to the above mentioned course (which cannot be taken online), a number of online modules are currently being developed for a wider audience within the Public Prosecution Service and the Judiciary (such as an e-learning module on criminal exploitation). Also, within the Judiciary, reference is made to the Council of Europe’s online course on human trafficking, which discusses the subject in great detail, partly on the basis of the relevant international and European conventions and case law. In the previous edition (2024), a number of members of the Dutch Judicial Council took part in this online course.

Public Prosecutors Office

As of now it is not part of the training provided to prosecutors and judges. Currently, the training program is being reviewed to be updated. In this review the information and communication technology might be incorporated.

39. In what ways, if any, does your country utilise provisions from the Council of Europe Cybercrime Convention (Budapest Convention) to fight THB? If not, why is that the case?

Public Prosecutors Office

The Netherlands primarily uses the procedural powers and cooperation framework inspired by the Budapest Convention to secure and share electronic evidence in THB investigations, rather than relying on it as a separate, trafficking-specific international instrument.

Dutch criminal procedure law incorporates powers that mirror those required under the Budapest Convention, such as expedited preservation of computer data, production orders for subscriber information, search and seizure of data carriers, and real-time interception or collection of traffic and content data, which are used in complex THB cases involving online advertising platforms, messaging services and other ICT-based tools. These powers are applied both in stand-alone THB investigations and in joint investigation teams and other forms of cross-border cooperation, where electronic evidence must be rapidly obtained from or via other Parties to the Convention. Moreover, the Convention's framework facilitates international mutual legal assistance and police-to-police cooperation in cases where THB networks operate transnationally and rely heavily on digital infrastructure.

At the same time, the Budapest Convention is not used in isolation but operates alongside (or: because of its broader scope as an extension to) EU instruments on electronic evidence and mutual recognition, as well as national cybercrime legislation, meaning that in practice it functions as one element in a broader toolbox for addressing technology-facilitated THB.

Part II – Country-specific follow-up questions

40. Please provide information on measures taken in your country in respect to the following recommendations made in GRETA's previous reports:

- ensure that victims of trafficking for the purpose of labour exploitation can obtain compensation from the perpetrator as part of criminal proceedings, and allow all victims of trafficking to join the criminal proceedings against the perpetrator and claim compensation, regardless of the number of victims in the case;

The procedures for victims of labour exploitation are the same as the procedures for victims of THB. That is, a victim can claim compensation within a criminal procedure (material and not material damage) and/or start a civil procedure. In the first case the victim can be assisted and represented by a lawyer. An individual victim of labour exploitation has the right to join the victim's case as an injured party and to seek damages—this does not depend on the number of victims.

- ensure that the "slightest indication" criterion for identifying victims of trafficking is applied consistently by the police, KMar, NLA and OM, regardless of the purpose of exploitation, and that the recovery and reflection period is provided accordingly;

Under Action Line 3 of the National Action Plan, a broad-based working group is working to improve the identification of victims and the protection of victims. Currently, the possibility is being explored of designating a fourth party from the healthcare sector that—in addition to the police, the NLA, and the KMar—can also identify even the "slightest indication" of human trafficking and offer the reflection period. During the reflection period, a victim has three months in which their obligation to leave the

Netherlands is suspended and during which they can consider whether or not to file a report, take initial steps toward recovery, and find peace of mind. If a report is filed, the victim may then be eligible for a temporary residence permit.

In addition, we are exploring the conditions under which an independent and multidisciplinary commission could be established to formally determine victim status outside the criminal justice process. This can support victims and provide them with recognition during their recovery process, even when a police report yields insufficient evidence to prosecute a perpetrator. Furthermore, a determination by an independent commission can help provide (more) opportunities for assistance and support. For victims without the right to reside in the country, formal recognition of victim status by a multidisciplinary commission can assist them in applying for lawful residence and the associated assistance and shelter, regardless of the status of the criminal investigation.

- ensure, in compliance with the obligations under Article 13 of the Convention, that all possible foreign victims of trafficking, including those falling under the Dublin Regulations, are offered a recovery and reflection period and are able to fully benefit from all the measures of protection and assistance envisaged in Article 12, paragraphs 1 and 2, of the Convention during this period;

National Action Plan

(Presumed) victims without lawful residence are offered a reflection period of three months. For those falling under the Dublin regulation this period is thirty days. They cannot be expelled during this period, based on section B8/3.1 of the Aliens Circular. The Action plan Together against Human Trafficking explores whether and how the criminal proceedings can be separated from the process of granting a residence permit to a foreign victim of human trafficking. Within this context an organization other than the investigative services should be able to grant the recovery and reflection period. This study also examines standardizing the process for all organizations who can offer a recovery and reflection period and to provide victims with all necessary information based on their needs and characteristics. Within the reflection period, victims without lawful residence are entitled to care and support within the Categorical Shelter for Victims of Human Trafficking (hereinafter COSM).

The COSM offers victims of human trafficking a safe shelter so that the exploitative situation can stop. Non-Dutch adult victims of human trafficking and their children are accommodated in the COSM, regardless of gender and nature of exploitation. The COSM examines the needs of the victim and how cooperation can be provided in the investigation and prosecution of the suspect(s). During the stay in the COSM, medical, psychological, social and legal support is offered. In order to be placed in the COSM, the victim must be in the reflection period of the B8 procedure. In principle, the reception is for a period of 3 months for third-country nationals without lawful residence (and thirty days for Dublin claims).

- ensure that victims of human trafficking can fully benefit in practice from the right under Dutch law to obtain a renewable residence permit when they are unable to co-operate with the authorities, and raise awareness of this possibility among relevant professionals and victims.

National Action Plan

The Action plan *Together against Human Trafficking (2024-2027)* explores with relevant organizations, victims and professionals whether and how the criminal proceedings can be separated from the process of granting a residence permit to a foreign victim of human trafficking. Not all victims are able of willing to co-operate with the authorities and by exploring this we hope to to be able to acknowledge actual victimhood rather than victimhood as defined by criminal law.

41. Please provide information on developments in your country since GRETA's third evaluation report concerning:

- emerging trends of trafficking in human beings;

Centre Against Child and Human Trafficking

Criminal exploitation of children and young people. Sexual exploitation of children by their parents – a largely hidden group of victims, which is difficult to identify (CKM rapport Van kwaad tot erger, 2025).

Dutch National Rapporteur on Human Trafficking

Recent registrations show a continued rise in identified victims in 2023 and 2024. At the same time, the totals remain well below estimated prevalence. This indicates persistent underdetection and underreporting. Sexual exploitation is still the most frequently registered form, with most victims being exploited in home based prostitution, followed by the escort sector. Compared to home based and itinerant settings, window brothels and licensed clubs account for a smaller share of registrations. As activity moves out of regulated venues, detection and oversight become more difficult.

Within international sexual exploitation there is growth among victims from African and Latin American countries. Frequent moves between hotels and short stay rentals, with rotation across regions and countries, make cases harder to trace and leave victims more exposed.

Labour exploitation is concentrated in transport and logistics and in construction. Domestic work has become visible again as a domain of concern. These patterns align with vulnerabilities linked to flexible work, subcontracting chains, and dependency in work and housing. The war in Ukraine coincides with a clear increase in Ukrainian victims, mainly in labour exploitation. Language barriers, limited knowledge of rights, and precarious income play a role.

Among minors, criminal exploitation is more visible, including coerced money muling and drug related activities. Signals point to elevated risks for unaccompanied minors in reception, not yet fully reflected in registrations. This underscores the need for targeted identification and sustained referral to protection.[40,41]
Signals and figures of minors becoming victims of sexual exploitation remains concerning, which risks have increased through the use of ICT in the recruitment of (minor) victims as well as controlling them.[42]

Answer Comensha

Compared to 2022, Comensha recorded an increase in the absolute number of registered victims across several forms of exploitation in 2025. The number of registrations relating to sexual exploitation increased from 393 to 459, labour exploitation from 348 to 401, and criminal exploitation from 105 to 142. The relative distribution between forms of exploitation remained largely stable, with sexual exploitation accounting for approximately 45–46% of registrations, labour exploitation around 40%, and criminal exploitation increasing slightly from 12% to 14%. A similar pattern can be observed with regard to gender. While the absolute number of both male and

[40] National Rapporteur on Trafficking in Human Beings and Sexual Violence Against Children, Annual Figures on Trafficking 2023
[41] National Rapporteur on Trafficking in Human Beings and Sexual Violence Against Children, Annual Figures on Trafficking 2024
[42] Nationaal Rapporteur Mensenhandel en Seksueel Geweld tegen Kinderen (2024). Monitor mensenhandel 2019-2023. Nationaal Rapporteur.

female victims increased between 2022 and 2025, the proportion of male victims rose from 38% to 42%, while the proportion of female victims decreased from 61% to 58%. The number of registered child victims also increased in absolute terms, from 70 in 2022 to 90 in 2025, although their relative share remained stable at approximately 9%. These figures suggest that the increase in registrations is not limited to one specific form of exploitation or victim profile. At the same time, the relatively stable proportions over time indicate that persistent patterns of victimisation and underidentification continue to exist across different groups of victims. We want to reiterate once more that the vast majority of victims remain unidentified and outside official registration systems. The available figures should therefore be understood as representing only the tip of the iceberg.

In 2025, the number of notifications received by Comensha that could not be included in the national registration figures increased further. Due to uncertainty surrounding data protection requirements, some organisations only shared limited information on presumed victims and omitted key identifying details, such as date and place of birth. As a result, many cases could not be incorporated into the official registration figures. This means that many of the victims that care organizations have encountered could not been reflected in the statistics.

- the legislation and regulations relevant to action against THB;

- *Act on the Modernization and Expansion of Criminalization of Human Trafficking (273f)*
  This bill amends the Criminal Code and several other laws in connection with the modernization and expansion of the criminalization of human trafficking. The central objective of the bill is to make the criminal justice response to human trafficking more effective, thereby improving the prosecution of perpetrators and the protection of victims.

  This proposal simplifies the criminal provisions regarding human trafficking. The coherence between the various forms of the offense is improved to bring the law more in line with current realities. To achieve this, all conditions for criminal liability are codified in the law. Furthermore, the legal classifications and maximum penalties are better aligned with the nature of the conduct to which they apply. For example, there is greater clarity regarding the relationship between human trafficking and the related concept of exploitation. As a result, the legal community will be better able to apply this bill in practice. In addition, this bill provides for significant expansions of criminal liability. For instance, the offense of “serious harm” introduces a new criminal offense. This creates broader opportunities to take criminal action against serious abuses in the workplace, such as a migrant worker who is exploited over a long period of time. The criminal offense relating to profiting from human trafficking is also being expanded and broadened. This will allow those who profit from human trafficking or the serious exploitation of a person to be prosecuted and punished more effectively.

  The bill was passed by the House of Representatives on June 10, 2025. The bill is currently under consideration by the Senate. On July 16, 2025, the Senate shared ”het verslag” with the Ministry of Justice and Security, which contained questions about the bill raised by the Senate Standing Committee on Justice and Security. The responses in the so-called “nota naar aanleiding van het verslag” were shared with the Senate on October 2, 2025. Subsequently, on November 18, the Senate posed additional questions in a second report. The responses to these questions were shared with the Senate on March 10, 2026 in the so-called “tweede nota naar aanleiding van het verslag”. On April 7, the Standing Senate Committee shared a letter with the Minister of Justice and Security in which they requested clarification as to why marital exploitation is not explicitly included in the bill. The minister responded to this in a letter DATUM.

- *Implementation Act for the Revised European Directive on Trafficking in Human Beings*
This bill implements EU Directive 2024/1712 on preventing and combating trafficking in human beings and protecting victims of trafficking. It amends the existing EU Directive 2011/36, which has been evaluated by the European Commission.

  This bill introduces several amendments to national criminal law. For example, the list of forms of exploitation is expanded to include exploitation through surrogacy, exploitation through forced marriage, and exploitation through illegal adoption. In addition, the scope of criminalization for the use of sexual services provided by a victim of human trafficking is broadened to include the use of non-sexual services provided by a victim of human trafficking. The role of the national coordinators for combating human trafficking has also been strengthened.

  The bill was submitted to the House of Representatives on October 1, 2025. On December 22, 2025, the House of Representatives raised questions about the bill in what is known as the report. The responses contained in the memorandum in response to the report were submitted to the House of Representatives on March 18, 2026. The parliamentary discussion has been scheduled for 22 September 2026.

➢ the institutional and policy framework for action against THB (co-ordinating bodies, specialised entities, national rapporteur or equivalent mechanism, involvement of civil society, public-private partnerships);

On December 21, 2023, members of the House of Representatives submitted a motion requesting that the government investigates how national management and coordination of human trafficking can be achieved and what added value a national human trafficking coordinator could provide in this regard. According to the proposers, the study should aim to: identify the bottlenecks in the current approach to human trafficking under the decentralized system. Subsequently, it can be assessed whether these bottlenecks could be better addressed through a national approach. In response to this, following consultation between the Ministry of Justice and Security and the Ministry of Health, Welfare and Sport (care for victims of human trafficking), it was decided to submit a research proposal to the WODC. The results of the study were published on April 13, 2026.[43]

Related to this is the recommendation from the National Rapporteur on Trafficking in Human Beings and Sexual Violence against Children, which was submitted to the Minister of Justice and Security[44]. The advice is based on the so-called “Anti-Trafficking Architecture” of the Organization for Security and Co-operation in Europe (OSCE). Within this advice the National Rapporteur recommends some changes to the institutional work to address the following challenges: unclarity of roles and responsibilities, lack of strategic direction and lack of a decision-making process and process agreements. Therefore the National Rapporteur suggests the formalise the role of the Ministry of Justice as the National Coördinator for the approach on human trafficking, to install a Committee on Combating Human Trafficking, to install a National Referalmechanisme and establishing a clear structure for the care and safety sector.

[43] Landelijke aansturing en coördinatie aanpak mensenhandel | WODC - Wetenschappelijk Onderzoek- en Datacentrum
[44] Advies Nationaal Rapporteur aan minister van Justitie en Veiligheid over versterking governance aanpak mensenhandel | Nationaal Rapporteur

Because of the overlap between the WODC research and the governance advice from the National Rapporteur, the Ministry of Justice and Security has reacted on both reports on how they will follow-up on the recommendations from the report. As a result, the following changes have been proposed by the government to strengthen the approach on human trafficking:

- The minister is currently the coordinating minister for the government-wide approach to human trafficking. He will take on a strengthened and more formalized role as National Coordinator, as required by the revised EU directive.
- In accordance with the governance recommendation of the National Rapporteur on Human Trafficking, the recommendation is to largely integrate the Task Force on Human Trafficking and the Steering Group of the "Together Against Human Trafficking" action plan into the "Steering Council on Combating Human Trafficking."

  The Steering Committee will begin its work at the start of the new Action Plan "Together Against Human Trafficking" and will be tasked with providing strategic guidance and monitoring the Action Plan and other issues by setting objectives and frameworks and establishing agreements, including those regarding cooperation.

  The success of this Steering Committee depends in part on the mandate and commitment of its members; for this reason, the committee is composed of representatives at the senior management level. The Steering Committee consists, at a minimum, of senior management representatives from the Public Prosecution Service, the Police, the Dutch Labor Inspectorate, Comensha, the Association of Netherlands Municipalities (VNG), and the VNG's portfolio holder for Human Trafficking, and is chaired by the National Coordinator for Human Trafficking, the Minister of Justice and Security. The National Coordinator is in a position to bring decision-makers to the table and to provide guidance or practical tools in consultation with the parties involved.

  The ministers of Social Affairs and Employment, Health, Welfare and Sport, Foreign Affairs, and Asylum and Migration will be included as agenda members on the Steering Committee and will participate when the agenda warrants it. It is proposed that the National Rapporteur also participate, as an observer, given her independent position. The Steering Committee will meet twice a year. The Steering Committee will receive administrative support from the Ministry of Justice and Security.
- It is also proposed to establish a broad working group under the Steering Committee, composed of representatives from organizations at the management team level. This will include, at a minimum, the organizations that are members of the Steering Committee. The working group will further be supplemented by key stakeholders who play a decisive role in shaping the approach. The working group will prepare decisions for the Steering Committee, coordinate specific matters related to the Action Plan, and discuss the approach to human trafficking at a more tactical level.

  It remains to be determined where the Mirror Group—a group of experts by experience who serve as an important sounding board and provide advice on the approach—will be integrated. For now, our preference is for them to participate in the working group.

- the current national strategy and/or action plan for combating trafficking in human beings (objectives, main activities, budget, bodies responsible for the implementation, monitoring and evaluation of results);
  No changes have been made to the current action plan which is still running until the 1st of July 2027.

- recent case-law concerning THB for different forms of exploitation.

Part III - Statistics on THB

42. Please provide the following statistics, per year starting with 2020, where available disaggregated as indicated below:

- Number of presumed victims and identified victims of THB in the sense of having been recognised by a state institution or mandated NGO as bearers of rights to services provided for by the Convention (with breakdown by sex, age, nationality, form of exploitation, internal or transnational trafficking, and body which identified them).

In the Netherlands, Comensha has been appointed as the official registration organisation for all identified presumed victims of human trafficking, on behalf of the Dutch National Rapporteur. Ideally, all possible victims identified by any organisation or person in the Netherlands should be reported to Comensha. Institutions authorized to carry out criminal investigations into human trafficking are mandated to do so. These are: the National Police (comprising ten regional police districts and one central unit) that comes across all forms of trafficking; the Royal Netherlands Marechaussee (i.e. the Border Police, Dutch acronym: KMar) that usually only comes across cross-border trafficking; and The Netherlands Labour Authority, which typically comes across cases of labour exploitation,. In addition, designated regional coordinators and other governmental as well as non-governmental institutions – such as organisations providing services to victims/migrants/prostitutes specifically; organisations providing social or legal services; and youth welfare agencies – are invited to report on all cases of presumed victimization. Finally, concerned citizens (or even victims themselves) can (self-)identify possible victims and report to Comensha directly.

Although this system has been in place for several years already, and reporting and registering has steadily improved, it still cannot be assumed that every identified possible victim in the Netherlands is always duly reported. In order to report to Comensha, the organisations/persons that come across potential victims should:

(1) be capable to identify possible victimization (be capable to recognize and interpret signals);
(2) be aware of Comensha as the national registration organisation;
(3) be willing to report to Comensha/acknowledge the importance of reporting (e.g. youth welfare agencies are much more reluctant to report to Comensha than for example service providing organisations specialized in human trafficking victims);
(4) be able to report to Comensha (e.g. with regard to consent of the presumed victim to reporting, that is currently required for privacy reasons, especially when it concerns minors).

These are not constant omnipresent factors; they vary per organisation/person, per region, over time etc. However, it is important to note that we do not have any data on *identified* victims, since victims registered at Comensha are all presumed victims (i.e. identified possible victims) and they are not subjected to a formal assessment on victimization. This is essential for the interpretation of the statistics on victims in The Netherlands provided by the Dutch National Rapporteur.

Nevertheless, when it comes to victims that are recognised as ‘deserving of rights or entitlements to services provided for by the Convention’ then the number of presumed victims can be used as the

number of identified victims since all persons for whom there exists the smallest indication that they might be trafficking victims are entitled to various services and facilities, such as shelter, legal advice and the right of temporary residence.

There is no reasonable grounds test for identifying possible victims of trafficking in human beings, but instead all presumable victims of trafficking are registered (see answer to previous question). As mentioned earlier, all kinds of organisations and individuals are invited to report victims to Comensha, not only, so-called, 'competent authorities'.

The number of presumed victims reported by all the identifying bodies is larger than the total number of presumed victims since some victims were reported to Comensha by more than one identifying body. If a victim is reported multiple times, Comensha ensures they are deduplicated.
Minor means underage under Dutch law, i.e. under the age of 18.
Nationalities were grouped according to region.

For form of exploitation, 'Unknown' exploitation includes both persons for whom the form of exploitation is not known and who were encountered/registered before exploitation had commenced. In addition, organ trafficking is included in this form due to very low numbers.

The category "other" for identifying bodies at the least includes: shelter organisations, Nidos Foundation (organisation for the protection and guardianship of Unaccompanied Minor Asylum Seekers), aid organisations, regional care coordinators, IOM, youth care, Dutch Council for Refugees (and other organisations for asylum and asylum seekers), legal services, individuals, and clients themselves.
Data for 2025 are not available yet.

			Number of presumed victims			
		2020	2021	2022	2023	2024
Total		1013	791	814	868	944
Sex						
	Male	420	268	309	364	385
	Female	576	510	500	493	556
	Unknown	17	13	5	11	<5
Age						
	Minor	68	75	70	52	79
	Adult	681	569	582	727	759
	Unknown	264	147	162	89	106
Nationality						
	Netherlands	155	237	209	194	213
	EU (excl. NL)	368	272	291	246	263
	Africa	322	145	151	239	239
	Asia	74	83	75	60	78
	Latin-America and the Caribbean	76	44	53	124	147
	Other	<5	<5	0	<5	0
	Unknown	15	9	35	<5	<5
Form of exploitation						
	Sexual, internal	119	289	262	135	123
	Sexual, transnational	317	197	217	333	364

	Labour	449	326	348	299	356
	Criminal	154	95	106	120	160
	Unknown	39	31	16	36	7
Identifying body						
	Police	468	307	317	354	327
	Royal Netherlands Marechaussee	31	16	6	50	67
	Labour Inspectorate	38	40	50	33	71
	Other	595	525	522	561	585

Data source: Comensha

Every year a high number of persons is reported to Comensha who cannot be included in the statistics because (personal) information is not shared with Comensha. In 2023 this concerned a number of 605 of such reports. These are not visible in the statistics. The National Rapporteur addressed this issue in the monitoring report in 2024 and recommended to lift the barriers for information sharing so these reports can be included in the future.[45]

- Number of victims of THB identified as part of the asylum procedure (disaggregated by sex, age, nationality, form of exploitation).
  No data available
- Number of victims of THB who received assistance (disaggregated by sex, age, nationality, form of exploitation, internal or transnational trafficking).
  No data. It is unclear what is meant exactly by 'assistance' in this context. Perhaps in the future more data will be available if the concept were to be clarified.
- Number of child victims of THB who were appointed legal guardians.
  No data.
- Number of victims of THB granted a recovery and reflection period (disaggregated by sex, age, nationality, form of exploitation).

➢	2020	2021	2022	2023	2024
Number of victims granted reflection period	70	70	110-120	190	210

The reflection period can be offered by the National Police and the Royal Netherlands Marechaussee. The residence permit is then granted by the Immigration and Naturalisation Service (IND).
These data were requested and received in aggregated form, rounded to tens, so disaggregation by sex, age, nationality or form of exploitation is not possible.

Data source: IND.

- Number of victims of THB granted a residence permit, with an indication of the type of the permit (for the purpose of co-operation in the investigation/proceedings, on personal grounds, other) and its duration (disaggregated by sex, age, nationality, form of exploitation).

	2020	2021	2022	2023	2024
Number of victims granted temporary residence permit	170	100	110	150	170

[45] Nationaal Rapporteur Mensenhandel en Seksueel Geweld tegen Kinderen (2024). Monitor mensenhandel 2019-2023. Nationaal Rapporteur, p. 63-64, 226-227.

based on temporary humanitarian grounds (B8)					
Number of victims granted temporary residence permit based on non-temporary humanitarian grounds (B9)	30	20	10	20	20

Residence permits, among which those granted based on human trafficking victimhood, are processed by the Immigration and Naturalisation Service (IND).

The statistics provided in answer to this question refer to two types of temporary residence permits for victims of trafficking in human beings:

- Temporary residence permit on temporary humanitarian grounds (see chapter B8/3 in the Aliens Circular 2000). In principle, a victim is granted a this permit after filing a report for human trafficking or cooperating with the criminal proceedings. Alternatively, if a victim is unable to file a report they can request this permit on grounds that they are unable to do so due to a) a serious threat related to filing a report b) medical, psychological obstructions c) (as of October 2018) being a minor. This request has to be substantiated with proof of either 3.
  Temporary right of residence is granted for a period of one year and can be extended by one year each time. The IND will withdraw temporary residence rights if there is no longer any question of an investigation or prosecution into or adjudication of the human trafficking offense reported or to which the victim has cooperated. Victims with temporary residence rights are entitled to shelter, housing, medical assistance and legal aid.
- Temporary residence permit on non-temporary humanitarian grounds (see chapter B9/12 and B9/10 in the Aliens Circular 2000).[46] This permit can be granted to victims who have received a B8 temporary permit due to human trafficking. The primary grounds for this "follow-up permit" were as follows until October 1st 2018:
  - the criminal case has resulted in a final conviction; or
  - the criminal case did not lead to a conviction, but the victim had been staying in the Netherlands for more than three years at the time of the decision on the basis of temporary residence; or
  - the criminal case is still ongoing and the victim is staying in the Netherlands for three years on the basis of a temporary stay.

  As of October 1st 2018 the primary grounds are as follows:
  - the public prosecutor decides to prosecute in respect of the criminal offense that has been reported and has resulted in the granting of temporary residence rights; or
  - the criminal case is still ongoing and the victim is staying in the Netherlands for three years on the basis of a temporary stay.

  If the victim does not qualify on the basis of these primary grounds, the IND can grant continued residence on the grounds of special individual circumstances related to human trafficking, which prevent the victim from leaving the Netherlands. The victim must then demonstrate that such circumstances exist. The IND will in any case take into account the following factors in its substantive assessment:
  - the risk of reprisals against the victim and their family and the degree of protection that the authority in the country of origin can offer against this;

[46] On 1 July 2024, paragraph B9/12 of the Aliens Circular 2000 (Vc 2000) was amended. Since then, the IND also grants a residence permit on non-temporary humanitarian grounds if a complaint as referred to in Article 12 of the Code of Criminal Procedure concerning human trafficking has been upheld and the Court of Appeal has ordered the public prosecutor to institute criminal proceedings for human trafficking. Decision of the State Secretary for Justice and Security of 27 June 2024 (Government Gazette 2024, 19498)

- the risk of persecution in the country of origin, for example on the basis of prostitution; and
- the possibility of social and societal reintegration in the country of origin.

This permit is granted for a period of five years and can be extended each time for another five years.

These data were requested and received in aggregated form, so disaggregation by sex, age, nationality or form of exploitation is not possible.

- Number of persons given refugee status or subsidiary/complementary protection on the grounds of being victims of THB (disaggregated by sex, age, nationality, form of exploitation).

No data

- Number of victims of THB who claimed compensation, who were granted compensation and who effectively received compensation (disaggregated by sex, age, nationality, form of exploitation, with an indication of whether the compensation was provided by the perpetrator or the State, and the amount awarded).

The figures available on this topic concern the number of times a compensation was imposed by a judge as part of imposed measures and/or ancillary penalties in court cases that resulted in a first-instance conviction for human trafficking. The figures are disaggregated by form of exploitation.
(Next to this form of compensation, a government fund called 'Schadefonds Geweldmisdrijven' provides victims who have suffered serious psychological or physical injury as a result of a violent offence, such as THB, with financial compensation. See next item.)

Compensations imposed by conviction						
	2020	2021	2022	2023	2024	2020-2024
Sexual – internal	23	36	29	30	0	118
Sexual – transnational	5	8	9	4	1	27
Sexual - unknown	1	4	0	0	32	37
Labour	1	6	2	1	2	12
Criminal/other	4	4	2	8	1	19
Total	34	58	42	43	36	213

Note: It must be noted that in the judgments in which THB has been declared as proven, other proven offences alongside THB are often involved. The number of imposed compensations are therefore *not necessarily (solely) imposed for THB*.

Data source: Public Prosecution Service (OM).

- Number of victims of THB who received another form of financial support from the State, with the indication of the amount received.

In 1976, the Wet Schadefonds Geweldsmisdrijven (Violent Offences Compensation Fund Act) was established as a safety net for victims who are not eligible for compensation through criminal law. It is a government fund with an independent committee that sets the policy for awards and assesses applications. The Compensation Fund provides victims who have suffered serious psychological or physical injury as a result of a violent offence, such as THB, with financial compensation. In doing so, the government acknowledges, on their behalf, the injustice that has been done to them.

The figures below show the number of THB victims that claimed compensation and the number of victims that were granted a compensation between 2020 and 2023.

	2020	2021	2022	2023
Number of victims who claimed compensation	160	118	172	125
Number of victims granted compensation	92	67	95	72

Data source: Schadefonds Geweldsmisdrijven.

- Number of victims of THB who received free legal aid.
  No data
- Number of victims of THB who were returned or repatriated to/from your country (disaggregated by sex, age, country of destination, form of exploitation).
  No data

- Number of investigations into THB cases (disaggregated by type of exploitation, with an indication of the number of victims concerned).

		Number of investigations into THB				
		2020	2021	2022	2023	2024
Total		172	176	180	182	142
Type of exploitation	Sexual	143	135	136	119	84
	Labour	9	11	7	11	6
	Criminal	9	5	12	36	37
	Unknown	11	39	47	36	29

- This data is based on police registration system for criminal investigations – Summ-IT – and data provided by the Netherlands Labour Authority (NLA) and the Royal Netherlands Marechaussee. These separate sources are considated and enriched by the Centre of Expertise for Trafficking in Human Beings and Human Smuggling (EMM). They create a dataset of the yearly criminal investigations into human trafficking as well as a dataset with all the registered persons involved (suspects, witnesses, victims).
- The form of human trafficking is not recorded separately in Summ-IT for each criminal investigation. In many cases, however, the form of human trafficking can be traced. Firstly, the EMM keeps track of data on the nature of the human trafficking investigated – such as form of exploitation, source country and nationality of victims. In addition, in the case of criminal investigations by the NLA, the form of human trafficking can be derived from the specific task of the investigative body. When it comes to human trafficking, the NLA only conducts criminal investigations into labour exploitation. On the basis of all this information it is possible to classify a large part of the investigations into one of the four forms of human trafficking. This was done by the office of the National Rapporteur.

- Some drawbacks: Available figures about the numbers of victims involved are not complete and therefore not presented here. After submission and prior verification of the figures, the NLA indicated that, in their view, the current method of determining the figures does not provide an accurate picture of the number of criminal investigations initiated by the NLA. We are in discussions with all parties involved about whether the figures should be determined differently in the future.

Data source: EMM.

➢ Number of prosecutions in THB cases (disaggregated by type of exploitation, with an indication of the number of victims and defendants concerned).

➢	Number of prosecutions				
	2020	2021	2022	2023	2024
Sexual	177	222	170	175	151
Labour	13	15	31	17	19
Criminal/other	9	21	8	27	37
Unknown	<5	<5	5	0	<5
Total	202	261	214	219	210

Number of prosecutions refers to number of subjects as one case per defendant is filed with the Public Prosecution Service (OM).

Note: The statistic used here is the number of cases (i.e. suspects) that the OM brings to trial, which excludes those cases in which the OM has decided not to prosecute.

Note: The National Rapporteur has no data available on 2020.

Data source: OM.

➢ Number of convicted perpetrators of THB (disaggregated by sex, age, nationality, form of exploitation).

➢ Convictions, form of exploitation						
	2020	2021	2022	2023	2024	2020-2024
Sexual – internal	30	58	39	38	0	165
Sexual – transnational	6	12	10	5	<5	34
Sexual - unknown	<5	5	0	0	45	53
Labour	<5	6	<5	<5	<5	14
Criminal/other	6	6	<5	9	<5	28
Total	48	87	54	53	51	294

Convictions, sex					
	2020	2021	2022	2023	2024
Male	37	75	44	41	47
Female	11	12	10	12	5
Total	48	87	54	53	52

Convictions, age					
	2020	2021	2022	2023	2024
18- (minor)	26	48	34	20	27
18 to 30	<5	<5	0	5	<5
30+	18	37	20	28	24
Total	48	87	54	53	52

Convictions, country of birth					
	2020	2021	2022	2023	2024
Netherlands	30	57	41	35	36
EU+EER+Switserland	6	11	6	8	<5
Other	12	18	7	10	15
Unknown	0	<5	0	0	0
Total	48	87	54	53	52

Note: It is important to note that the prosecutions (Q13) and the number of convictions are not cohorts.

Note: These numbers refer to cases not perpetrators. Perpetrators can have multiple cases, but cases can only have one perpetrator.

Note: These numbers refer to actual convictions for THB offences and not to all cases in which THB was one of charges and where a conviction followed. In other words, cases where suspects were charged with THB and one or more other offences, but only other offences could be proven, were not included in these data.

Note: The data are on courts of first instances. Both the suspect and the public prosecutor may have lodged an appeal.

Note: Note that countries of birth is not necessarily the same as nationality.

Note: Countries of birth where N >= 5 are Netherlands, Netherlands Antilles, Bulgaria, Romania, Morocco, former Yugoslavia, Surinam, Turkey.

Data source: OM.

- Number of convictions for THB, with an indication of the form of exploitation, whether the victim was adult or child, the type and duration of the penalties, and whether they were effectively enforced or suspended.

Convictions, duration non-suspended custodial sentences					
	2020	2021	2022	2023	2024
Fine	0	0	0	0	0
Community service	1	0	0	2	0
Suspended custodial sentence	2	1	3	1	2
Partly suspended custodial sentence	29	38	23	27	19
Non-suspended custodial sentence	15	45	28	23	27
Total	47	84	54	53	48

Convictions, duration non-suspended custodial sentences					
	2020	2021	2022	2023	2024
1 day – 3 months	6	12	11	9	5
3 – 6 months	7	13	4	2	4
6 – 12 months	9	20	3	13	7
12-24 months	9	21	12	12	11
>24 months	15	18	24	15	21
Total	46	84	54	51	48

Note: We have no data about the victims related to the convictions.

Note: We have no data on whether or not the suspendable part of a sentence was enforced, as we only have data on the trial and sentencing, not on parole and parole violations.

Note: It must be noted that in the judgments in which THB has been declared as proven, other proven offences alongside THB are often involved. These obviously also influence the sentence. The average duration displayed is therefore *not solely imposed for THB*.

Note: The data are on courts of first instances. Both the suspect and the public prosecutor may have lodged an appeal.

Data source: OM.

- Number of judgments in THB cases resulting in the confiscation of assets.

  No reliable data.

- Number of convictions of legal entities for THB.

  No data.