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**Reply from Greece**  
**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**

**Second evaluation round**  
**(Reply submitted on 5 July 2021)**

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Hellenic Republic  
Ministry of Foreign Affairs  
Office of the National Rapporteur  
on Trafficking in Human Beings  
1 Vas.Sofias Avenue, Athens  
+30 210 368 1844| [nat.rap@mfa.gr](mailto:nat.rap@mfa.gr)

Ms Petya Nestorova  
Executive Secretary of the Council of Europe  
Convention on Action against Trafficking in Human  
Beings

Athens, 05 July 2021

**Subject: National contribution of Greece to the second evaluation of the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by the parties**

Dear Ms Nestorova,

Following your letter dated 4 February 2021 regarding the second evaluation of the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings, I have the pleasure in my capacity as a National Rapporteur on THB of Greece to submit herewith the answers to the questionnaire.

I look forward to continuing the dialogue and fruitful co-operation with GRETA.

Yours sincerely,

Heracles Moskoff, PhD  
National Rapporteur on THB

## Introduction

In accordance with Article 38, paragraph 1, of the Convention on Action against Trafficking in Human Beings, 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.

GRETA has decided that the second evaluation round of the Convention will start on 15 May 2014. For the second evaluation round, GRETA has adopted a questionnaire to be sent to all states parties which have undergone the first round of evaluation, following a timetable approved by GRETA. States parties are requested to transmit to GRETA a reply to this questionnaire within five months from the date it was sent.

Following a first round of monitoring, which provided an overview of the implementation of the Convention by each state party, GRETA has decided to examine during the second evaluation round the impact of legislative, policy and practical measures on the prevention of trafficking, the protection of the rights of victims of trafficking, and the prosecution of traffickers. The adoption of a human rights-based approach to action against trafficking in human beings remains at the centre of this new evaluation round. In addition, particular attention is paid to measures taken to address new trends in human trafficking and the vulnerability of children to trafficking. GRETA has selected provisions of the Convention which are mainly related to these issues.

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. The reply to the questionnaire should contain all the relevant information on the implementation of the Convention since GRETA's first evaluation report. Particular emphasis should be put on the practice and impact of legislative and other measures taken. 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 first evaluation report.

States parties should provide copies or extracts of relevant legislation, regulations and case law mentioned in the reply to the questionnaire (as an appendix to the reply). These copies/extracts should be supplied 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.

- **A. Follow-up questions**

1. **Please provide information on developments since GRETA's first evaluation report on your country in the following areas:**

- **the main forms of trafficking in human beings (THB) and emerging trends observed in your country (for example, any new types or sectors of exploitation, recruitment methods, countries of origin or destination of the victims);**

Greece is a transit and destination country for victims, mainly trafficked for sexual exploitation, forced labour and forced begging. As **Greece is one of the entry points for migration flows into Europe**, potential victims of trafficking may be identified amongst the undocumented migrants entering the country. According to the NRM data, the **female asylum seekers represent the majority of the THB adult victims**, though mostly in their country of origin or along the migration route. It is worth mentioning that the Asylum Service and Reception & Identification Centers (RICs) are actively involved in the NRM, as their procedures give priority to identify refugees with vulnerabilities (incl. THB). THB victims arrive in Greece from other EU Member States (Eastern Europe) and/or third countries (e.g. Eastern Europe, South-East Asia and Sub-Saharan Africa).

THB for the purpose of **sexual exploitation remains the predominant typology** of trafficking in Greece. It affects 44% of the victims, the vast majority of whom are women and girls, revealing the gender dimension of the crime. According to the data by the National Referral Mechanism, a total of 167 referrals for presumed THB-victims were submitted in 2020 by a wide range of stakeholders (113 women/girls, 54 men/boys). 75 referrals were made for presumed victims of sexual exploitation. Throughout this period the traffickers have been widely using online recruitment, grooming and exploitation. The Hellenic Police has reported many incidents of the 'lover boy' method taking place through social media, targeting vulnerable women and girls.

The **second most prevalent form of THB is forced begging of minors**. 44% of the referred THB victims in 2020 are children, namely 74 out of a total of 167 referred victims, among which 66 from EU member states (mainly Roma children from Bulgaria, Romania, Greece), 3 unaccompanied minors and 2 unidentified status. Almost all of the children (73) were exploited for forced begging. In regards to **labour exploitation**, the victims have been exploited mostly in houses (domestic work) and the agricultural sector (the latter appears as the prevalent sector of exploitation in Greece). Cases of labour exploitation in the industrial and construction sector were also reported.

- **any changes in your country's laws and regulations relevant to action against THB;**

One of the most important developments in the legislation against THB during the reporting period is **the amendment of the Greek Penal Code**, by Law 4619/2019. The revised Penal Code (entered into force on 1.7.2019) introduced changes that significantly strengthen legislation in the field of combating THB and more specifically: 1) New forms of exploitation including slavery and similar practices, servitude, as well as forced criminality, have been added to the existing ones stipulated in article 323A PC. 2) Stricter punishment for the person who knowingly uses trafficked victims, that is, a term of imprisonment of at least 3 years and a fine. 3) The definition of exploitation as the acquisition of illegal benefit. 4) Trafficking in children is a punishable offence, even if none of the means set forth in the definition of THB has been used. (For more details, please see the answers below, the annex attached and the Replies to the Recommendations No 2 and 3).

Recently, the provisions on **victims' compensation** have been amended. Art 54 of the Law 4689/2020 stipulates that THB-victims are entitled to compensation not only when the crime was committed in the EU territory, but also in third country's territory.

By Law 4478/2017, special offices were created, called the "**Children's Houses**". Art. 227 of the Code of Criminal Procedure stipulates that children who are victims and witnesses of crimes of personal and sexual freedom, trafficking etc. are examined under **a special procedure during criminal proceedings**. It stipulates that the aforementioned victims are examined in special offices called "Children's Houses". Moreover, it provides that the examination of the victim is conducted by the competent authority (Prosecutor, Investigative Judge etc.) through a specialized psychologist or psychiatrist, who has received appropriate training. Additionally, it stipulates that the testimony of the child is always audio-visually recorded, so that such recorded testimony is used as evidence and the child doesn't have to testify again in the following proceedings. The "Children's Houses" are also competent for the individual assessment and the evaluation of the perceptual ability and the mental condition of under-age victims, the provision of general support services, the assistance to all competent authorities for the proper and child-friendly examination of the victim during criminal proceedings, as well as for the development of proper conditions and spaces for their examination and for the audio-visual recording of the child's testimony.

In addition to Art. 16 par. 3 of L. 4635/30.10.2019, Art. 63a of Law 4478/2019 was added which provides that, according to the Code of Penal Procedure (CPP), **assets** that were seized during the penal procedure and there were judged to be assigned to the victims are immediately **returned to them**. According to the new order of art. 373 CPP the attribution, to the victim of the reserved assets that derive directly or indirectly from criminal offence and are considered pecuniary detriment of the victim, is pre-stunning to the confiscation of such assets.

In 2020 the Supreme Court Public Prosecutor's Office has **amended a circular** according to which prosecutors should begin immediately with the preliminary enquiry in cases of complaint for trafficking and should accelerate the procedure to its completion, after exhaustively collect all evidence, in order to criminal prosecute the perpetrators.

In June 2021, **2 ILO Conventions** were ratified by Law 4808/2021, namely the ILO Convention 190 on violence and sexual harassment in the world of work and the ILO Convention 187 for Occupational Safety and Health. The Law 4808/2021 includes a vast number of provisions on the protection of employment, such as the digital work card with the aim to fight undeclared work hours and overtime.

The **Law 4604/2019** on substantive gender equality and preventing and combating violence against women is the first legislative attempt in Greece to implement a gender mainstreaming approach and eliminate gender inequalities in the public and private sphere. All basic notions, mechanisms, institutions and stakeholders are explicitly clarified aiming at the implementation of the principle of gender mainstreaming and at preventing and combating violence against women. The Pan-Hellenic gender-based violence network is institutionalized (Counseling Centers, Shelters, a 24-hour SOS 15900 helpline) by the law.

- ***the institutional framework for action against THB, in particular: any changes in respect of the composition and functions of the bodies responsible for co-ordinating national action against THB, the involvement of NGOs in co-ordinating bodies, the entities specialised in the fight against THB, and the establishment of a national***

***rapporteur or other mechanism for monitoring the implementation of anti-trafficking strategies, policies and activities;***

In February 2020, the **Special Secretariat for the Protection of Unaccompanied Minors (SSPUAM)** has been established by the Presidential Decree 18/2020 (art. 1 para 3) and its authorities are provided in L. 4636/2019 (art. 60 para 3, as amended by law 4686/2020). These include all aspects regarding the unaccompanied minors' accommodation and integration, their potential relocation within the EU, the safeguarding of their well-being and the development of national strategy for the protection of unaccompanied minors, its implementation and monitoring. The SSPUAM is in close collaboration with the National Rapporteur on Trafficking in Human Beings, implementing anti-trafficking trainings and activities aiming to the protection of unaccompanied minors.

The Law 4808/2021 establishes the **“Labour Inspectorate” as an Independent Administrative Authority**, which prior to the voting of the Law was operating under the Ministry of Labour and Social Affairs as “Labour Inspectorate Body (S.EP.E)”. According to Article 102, the Labour Inspectorate has full operational independence and administrative and financial autonomy, and it is subject only to parliamentary control.

In June 2021, a **working group** consisting of legal professionals and criminal justice practitioners specialised in THB was set up **within the Ministry of Justice**, with the support of the ONR and the NRM. More particularly, the working group will prepare a situation analysis which will highlight good practices, but more importantly shortcomings and deficits in the implementation of anti-trafficking legislation, with the aim on the one hand to draft a series of targeted recommendations to the law enforcement and legislative proposals, and on the other to promote projects for the rights of THB-victims and initiatives to combat the culture of impunity.

With regards to sex work, a **working group** of experts, with the participation of the ONR, has been set up in the **Ministry of Citizen Protection**. The working group was mandated to carry out an in depth consultation process with all competent stakeholders and based on the findings of this process to elaborate a legislative proposal regarding the amendment of Law 2734/1999 on sex work.

Also, in 2018 the National Rapporteur has been appointed as a representative of the Ministry of Foreign Affairs to the Greek National Commission for Human Rights (**NCHR-EEDA**). NCHR is an official independent advisory body to the Greek State in human rights issues.

- ***an overview of the current national strategy and/or action plan to combat trafficking in human beings (duration, objectives and main activities, bodies responsible for its implementation, budget, monitoring and evaluation of results).***

The National Action Plan 2019-2023 (NAP) drafted by the Office of the National Rapporteur on Trafficking in Human Beings (ONR) covers a wide range of policy-making projects that include inter alia measures to reduce vulnerabilities, trainings for more front-line professionals, targeted awareness-raising campaigns, assistance to and reintegration of victims, gender-informed policies, promotion of cooperation between national and international actors and enhanced action against organized crime.

Some of the recent ONR's initiatives implementing the NAP are the following:

- A special parliamentary session of three competent Parliamentary Committees on the occasion

of the World Day Against Trafficking in Persons, July 30<sup>th</sup> 2020, gave a prime example of solid political will to address THB and support the ONR to implement the National Action Plan 2019-2023. **The President of the Hellenic Republic**, HE Katerina Sakellaropoulou, **the Prime Minister**, Kyriakos Mitsotakis, the President of the Parliament, heads of parties, 5 competent Ministers, the Governor of the Regional Government of Attica, and approx. 100 MPs participated in the joint session. The three Parliamentary Committees were the Standing Committees on 1) Social Affairs and Public Administration, 2) Public Order & Justice, and 3) the Subcommittee for Combating Human Trafficking and Exploitation.

- An MoU has been recently signed between the ONR and **UNICEF Greece**, following the launch of the Country Office in Greece and the 10-year plan to accelerate progress for all children in Greece. With the aim to ensure the protection of children in Greece from THB, both parties have reiterated their commitment to develop new and strengthen existing practices and technical expertise in various areas, including capacity building and sensitization of frontline workers, Information dissemination and awareness raising, as well as promoting services for child and women victims of THB.
- The ONR promotes the active engagement of **Local and Regional Government** in Greece in combating THB and offering protection to THB presumed victims. The Regional Government of **Attica** and the Regional Government of **Thessaly** have each signed an MoU with the ONR, aiming to inter alia: (a) fully integrate the regional welfare structures into the NRM, (b) to provide training to frontline professionals regarding the NRM Standard Operating Procedures (SOPs) for identification and referral of presumed victims, (c) to launch large scale awareness raising campaigns, (d) to support social entrepreneurship initiatives for the reintegration of THB victims, (e) to develop technological applications for the identification of THB victims, and (f) to design and implement a due diligence program in supply chains and public procurement to ensure that the Regional Government upholds international best practices in this field.
- The **ONR and IOM Greece** have agreed on a joint action plan to pilot an intervention on awareness raising, information provision and training on the risks of THB and modern slavery to a variety of target groups, including migrants and refugees, local authorities and public institutions, private sector, as well as IOM staff. The trafficking component is mainstreamed within the main areas of IOM work and projects that are already ongoing.
- The **GRETA's 'Compendium** of good practices in addressing trafficking in human beings for the purpose of labour exploitation' was forwarded to all the Public Prosecutor's Offices in Greece by the Prosecutor of the Supreme Court. The Compendium was also translated into Greek and will be further distributed to the competent stakeholders.
- Due to the pandemic a **regional simulation based exercise** on identifying unaccompanied minors THB victims had to be postponed. The ONR is currently working with the Centre for Security Studies (KEMEA-Ministry of Citizen Protection) to run this project as soon as the conditions allow it. The simulation training will promote the involvement of the NRMs of the participating countries and will contribute to the specialized training of prosecutors and the judiciary in matters relating to the successful investigation of perpetrators, the proactive identification and protection of minor (presumed) THB victims etc.

#### National Action Plans:

The ONR is co-operating with all competent Ministries and Authorities in Greece with the aim to promote a more inclusive and human rights-centred identification regime for the victims, and to consolidate large-

scale prevention initiatives to target demand reduction. More particularly, the ONR has contributed on the following initiatives and National Action Plans:

- In March 2021, a Committee was set up with the aim of drafting a **National Strategy for the Equality of LGBTQI+** people in Greece. The Committee consists of academics, representatives of the civil society as well representatives of the government (incl. the National Rapporteur on Trafficking in Human Beings) and has recently presented a comprehensive action plan for the protection and inclusion of LGBTQI+ people in Greece. The Head of the Committee is Linos Alexandros Sisilianos, Former president of the European Court of Human Rights (ECHR).
- The Ministry of Justice has adopted a **National Action Plan for the Rights of the Child** after an extensive consultation process of all competent Ministries and stakeholders, including the ONR. The ONR ensured that a series of actions on protection of children from all forms of THB are included in the NAP.
- The SSPUAM has developed a 5-year **National Strategy for the Protection of Unaccompanied Minors**; it includes 4 pillars of action, one of which concerns the effective protection of minors from all forms of violence, exploitation and abuse, aiming at forming a comprehensive child protection framework by employing a series of prevention measures, setting standards for the support and intervention and ensuring that an efficient referral pathway is in place. These include, among others, the following actions: promoting the delivery of workshops to unaccompanied minors for raising their awareness on the dangers and enhancing their resilience; ensuring the development and implementation of child protection policies; developing a code of conduct for professionals coming into contact with minors; capacity building of professionals; advancing cooperation with European and international institutions and agencies and other countries; developing SOPs and a referral pathway particularly for incidents concerning UAMs; supporting unaccompanied minors survivors of sexual exploitation and abuse; establishing standard procedure for minors going missing.

## B. Cross-cutting questions

### Gender equality (Articles 1.1.b, 5.3 and 17)

#### 2. *What specific measures are taken in your country to address the gender dimension of THB and incorporate gender equality into the policies to prevent and combat THB and to protect and promote the rights of victims, including through the empowerment of women and girls?*

The General Secretariat for Demography, Family Policy and Gender Equality (GSDFPGE) of the Ministry of Labour and Social Affairs is the governmental body responsible for gender equality policies at all levels of social, civil, and economic life. It is the principal entity for preventing and combating gender-based violence against women. It has developed and continues to implement the “**National Programme on Preventing and Combating Violence against Women**” since 2010, which refers to all forms of gender-based violence (e.g., women and girls victims of THB, domestic violence, rape, sexual harassment,). The “National Programme on Preventing and Combating Violence against Women”, is part of the New National Action Plan on Gender Equality 2021-2025. Within this programme a network of 63 structures was established and operates for women victims of violence.

The network includes:



-the bilingual SOS telephone helpline 15900 and the e-mail address sos15900@isotita.gr (in Greek and English), which operates 24 hours/day and 365 days/year. It is a low-cost nationwide helpline (no-cost when using two of the three main telephone network suppliers), confidential and supported by gender-trained counsellors. The helpline also employs two 2 interpreters to support the needs of Farsi and Arabic speaking women. Women are informed via a pre-recorded message about the specific hours and days during which interpretation support is available.

-43 Counselling Centres and 19 shelters all over Greece.

The services provided by the abovementioned structures are free of charge and include psychosocial support, legal counselling as well as counselling in labour issues, emergency shelter and, where necessary, legal aid in cooperation with local Bar Associations. In designing and delivering these services, due consideration is given to the need to respond to different social, ethnic, and cultural backgrounds, faiths, states of health, etc. The overarching principle is to empower women victims of violence and help them to regain self-esteem, thus enabling them to make sound decisions for their future, and finally gain independence in their jobs and in their personal and family lives. The tasks of the structures also include networking with local agencies and relevant associations for joint communication and public awareness programs. All the structures provide help to victims regardless of whether they have been officially identified as victims of trafficking by the public prosecutor or only personally state themselves as such.

Please also see Q. 8.b. on Comprehensive Sex Education in schools. The programme is expected to contribute to gender equality by addressing gender norms and the concepts of gender based violence and sexual exploitation (incl. THB). The ONR's contribution is on the one hand to educate young girls on the dangers of THB including online exploitation and on the other hand to raise the awareness of boys towards demand reduction.

### **Non-discrimination** (Article 3)

#### **3. *What measures are taken to ensure that trafficked persons who are members of ethnic minorities have access to the rights specified in the Convention?***

In Greece, one group of persons is officially qualified as a "minority", namely the Muslim minority in Thrace, the status of which was established by the 1923 Treaty of Lausanne. The minority consists of three distinct groups, whose members are of Turkish, Pomak and Roma origin. The Muslim minority numbers approximately 120,000 members.

Roma population consists a social culture minority in Greece and numbers around 265,000. Many Roma live in Northern Greece, in the region of Macedonia and Western Thrace. Within the new EU Roma strategic framework (October 2020), the new **National Strategy for Roma Social Inclusion** will be elaborated, under the responsibility of the national focal point, the General Secretariat for Social Solidarity and the Fight Against Poverty of the Ministry of Labour and Social Affairs.

Children without **access to education** may be more vulnerable to THB and exploitation. Accessible and affordable quality education for all is a key factor towards addressing the issue of child trafficking (such as forced begging) by providing an escape route out of poverty. To this end, state and international stakeholders (Ministry of Education, ONR, UNICEF) will undertake common initiatives to improve the education of Roma children, in accordance with the National Strategy for Roma Social Inclusion and the National Action Plan of the Rights of the Child.

The Greek Government is also implementing policies upholding the **right to education of Muslim**

**minority students.** A 0.5% quota of the general admission to Universities and Higher Technical Educational Institutes is reserved to Muslim minority students from Thrace. This has led to an equally significant increase of the number of Muslim minority undergraduate students.

Considering that most victims of forced begging are Roma minors, the ONR/NRM is working hand in hand with two NGOs (Terre des Hommes and Arsis/Association for the social support of the youth) to promote best practices in identifying presumed victims of forced begging in the streets of Athens and Thessaloniki. Please also see Q. 27 about NRM SOPs.

4. ***What specific measures are taken to ensure that trafficked persons who are irregular migrants or migrant workers are identified as victims of THB and have access to the rights provided for in the Convention?***

Please see Q. 27 about NRM SOPs. According to NRM SOPs, protection is provided to all victims of trafficking identified regardless of their status, as residing in an irregular status in the country worsens the situation of vulnerability.

The General Secretariat for Demography, Family Policy and Gender Equality (GSDFPGE) has drafted and implemented a number of specialized interventions and actions for refugee and asylum-seeking women and their children. More specifically, GSDFPGE has been coordinating the actions of the other agencies which share the responsibility for the provision of services to vulnerable groups of the refugee/migrant population through the help of interpreters. These women are citizens of third countries or stateless— applicants for international protection or not—and beneficiaries of international protection (recognized refugees and beneficiaries of subsidiary protection) who are survivors of gender-based violence or potential victims of violence, or the heads of single-parent families, including their children.

To achieve this, the Protocol of Cooperation was signed among relevant stakeholders, aiming at the cooperation and agreement of all members following a common framework for the identification, referral and shelter provision to refugee women victims of gender-based violence and their children, its dissemination to all professionals working on the refugee crisis, either as part of the public administration, regional and local administration, or non-governmental organizations (NGO's).

Regarding the access of refugee and asylum-seeking women and their children to the network of structures on violence against women of GSDFPGE, and provided services towards them, the provided services are free of charge and include psychosocial support, legal counseling as well as vocational counseling, emergency shelter and, where necessary, legal aid in cooperation with local Bar Associations. In designing and delivering these services, due consideration is given to the need to respond to different social, ethnic, and cultural backgrounds, faiths, states of health, etc. Useful guidelines and information in Arabic and Farsi are on the website of the GSDFPGE for refugee women.

Informational material has been created (leaflets) in cooperation with the UNHCR for women refugees and migrants relevant to the services provided in English, French, Urdu, Kurdish, Farsi and Sorani. Furthermore, information on the existence and operation of the SOS 15900 Helpline has been periodically published to the immigrants' press. For the needs of refugee women and migrant women, a register of translators-interpreters for languages, other than English, has been created to serve refugee and migrant women in cooperation with the Center for Research on Gender Equality (KETHI).

Within the frame of the "**SURVIVOR: Enhancing Services for Refugee and Migrant GBV Survivors**" a European co-founded project with the collaboration of the DIOTIMA (leader), KETHI and the

International Rescue Committee (IRC Hellas), raise awareness material was produced in regard with the rights of GBV survivors as well as the services that are available for them and their needs. In this material refugee and migrant women victims or potential victims of gender-based violence were informed for their rights, and the existence of language-appropriate GBV services available. In total, 20,000 leaflets in Greek, English, Arabic and Farsi regarding GBV survivors' rights and available services were produced and circulated to refugee and migrant communities<sup>1</sup>.

Within the frame of "The **EMPOWER\_REF** "Empowering professional and refugee communities to detect, identify, address and prevent sexual and gender-based violence in Greece" co-funded European Project with the collaboration of the Centre for European Constitutional Law – Tsatsos Foundation (leader) and partners the Médecins du Monde, a leaflet with practical information was produced addressing the refugee community and victims and/or individuals at risk of Sexual Gender-Based Violence. The leaflet explains in simple terms and in an understandable way (including illustrations, photos etc) what constitutes violence and what one can do in case of SGBV or to which institutions can turn to. The leaflet is available in 8 languages, namely Arabic, Farsi, Dari, French, Urdu, Punjabi, English, Kirmanji. For design and usability purposes, four bilingual leaflets were designed (leaflet I: English/French, leaflet II: Arabic/Farsi, leaflet III: Dari/Urdu and leaflet IV: Punjabi/Kirmanji). Each leaflet was printed in 4.000 copies, i.e., a total of 16.000 copies for the 8 languages<sup>2</sup>.

5. ***What measures exist to ensure that male victims of trafficking are identified and provided with assistance and protection, including safe accommodation, as provided by the Convention?***

The efforts for the identification of victims of trafficking make no distinction in relation to the sexual orientation. All efforts aim to ensure protection and facilitate access to assistance for all victims of trafficking. Also, within the framework of refugee protection provisions, accommodation for male as well as LGBTQI victims is ensured. No shelters specifically for male victims of trafficking operate in Greece; however male victims may have access to temporary accommodation solutions (e.g., hotel voucher) in terms of NGO's projects.

**Training of relevant professionals** (Articles 10 and 29)

6. ***Please describe how the needs for training of professionals in the area of action against THB are identified and met, with an indication of the categories of staff that receive such training, whether the training is obligatory or optional, the content and focus of the training, and the funding provided for training activities. If the impact of training has been assessed, please provide details.***

State agencies in cooperation with international organizations and civil society have carried out a considerable number of specialized trainings for law enforcement and front-line professionals (including asylum services personnel, Reception and Identification Centers Personnel, etc.).

An indicative list of *recent* trainings-workshops-educational meetings is given below (please also see the Reply to the Recommendations for the trainings made prior to 2020):

**NRM capacity building activities**

To the direction of building the capacity of front-line professionals and harmonizing the interpretation of

1 see more details on <https://www.gbvsurvivor.gr/?lang=en>

2 see more details on: <https://empowerref.gr/en/home>

the legal framework, EKKA Anti-trafficking Advisors-trainers (deployed for the period November 2018 – March 2021 by the Norwegian Council for Refugees/NORCAP with RRA Grants funding) have been systematically delivering a series of interagency trainings across the country as well as seminars to first-line responders (of the public sector and civil society) in the Aegean islands and in the mainland during 2019 until February 2021. Since April 2021 the trainings have continued being delivered by the EKKA NRM support team members, in collaboration with the NRM legal advisor (deployed by NRC until February 2022).

The participation in those trainings has been non-obligatory, but the professionals' interest, as well as their encouragement from their organizations and services have been a crucial factor for their increased participation. The participants consist of public officers (such as health care staff, police officers, coast guard officers, juvenile curators at the courts, GBV shelters staff), as well as of NGO personnel (psychologists, social workers, lawyers, in general protection officers and child protection officers), the latter mostly intervening in the humanitarian context for the protection of refugees and asylum seekers. At the stage of the participants' recruitment, there is communication with the actors they work for, in order not only to facilitate their recruitment, but to identify their possible particular needs as well. The training curriculum is adapted therefore to their needs, for example if the professionals work on child protection, the respective thematic area is presented more extensively.

More particularly, the above NRM advisors/trainers have delivered 7 interagency 3-day seminars, on all 5 Aegean islands, where Hot-Spots are situated (Kos, Leros, Samos, Lesbos, Rhodes, Chios) and in Orestiada (Evros region), as well as in Thessaloniki during 2019 and 3 interagency face-to-face trainings in 2020 (2 trainings during one mission in Thessaloniki and one in Lesbos), all face-to-face, with an average of 27 participants to each one (see detailed reporting on NRM educational activities attached).

The training curriculum covers the theoretical part of human trafficking and presents the key notions of THB, the forms of exploitation, the basic principles of the communication with the victim, the national legal framework on victims' rights and official recognition, as well as the NRM SOPs and tools; two innovative sessions have been also included, a country profile session and the 3 decisions of the European Court of Human rights against Greece on human trafficking cases (L.E., T.I. and others and Manolada case – Chowdury and others v. Greece).

More specifically, the country profile session focuses indicatively on Nigeria (sexual exploitation abroad), Ethiopia (kafala system in Middle East) and Pakistan (bonded labour in bricks industry), in order to raise awareness on the cultural factors that may affect the identification process, as well as the importance of publicly available information on trends; it is highlighted at the same time that the relevant information should be used only to facilitate the identification and not to reproduce stereotypes.

Additionally, a specialized collaboration with the Asylum Service has been developed, ensuring also EASO's support; the EKKA Anti-trafficking advisors have developed a specific curriculum for the asylum service officers, adjusted to their specific needs (i.e., including a specialized topic of Refugee Status Determination for trafficked asylum seekers) and have been delivering several 2-day seminars, in Thessaloniki, in Athens and in Lesbos, as well as online. This collaboration is ongoing, with the most recent training having taken place through zoom at 27th and 28th May 2021.

Furthermore, EKKA Anti-trafficking advisors have been regularly delivering shorter trainings to NGOs' personnel, adjusting the presentations in their specific needs.

The Advisors shifted the NRM educational activities to online solutions, due to the pandemic-related

measures since May 2020. The whole agenda and curriculum of the training had to be adapted to the needs of e-learning because of Covid -19, including relevant e- quizzes, role playing exercises and interactive activities. The distance-learning experience has been quite positively evaluated by the participants.

Apart from the training evaluation after each training, an impact assessment has been recently conducted, to examine how the professionals have utilized the knowledge gained on the occasion of their everyday work; With 43 responses so far to the respective questionnaire, most of the participants state that they continue working on the protection sector, having applied their knowledge at 1-3 cases, in regards to the THB indicators. It is worth to add, that for each new member of NRM (mostly NGOs) brief informative sessions are being carried out, focusing on NRM and its tools.

**More than 800 first-line professionals** have been reached out through the above educational activities. Apart from the above trainings and in parallel with them, several face-to-face informative inter-sectoral meetings, funded by ISF fund, have been held all over Greece (Athens, Thessaloniki, Patra, Rhethymno, Heraklion, Aghios Nikolaos, Chania, Kalamata and Pyrgos), targeting the NRM focal points of all local state and non-state actors.

### **Ministry of Foreign Affairs**

The THB component was included in a 5-day webinar of consular staff on visa-related issues. During the seminar, around 100 employees of the Ministry of Foreign Affairs gained valuable information on THB indicators and ways of identification and referral of presumed THB victims.

### **Ministry of Justice**

Lifelong education and training of judges and prosecutors is of a high priority for the Ministry of Justice. In this vein, a series of seminars for judges on issues of immigrants and refugees, protection of minorities, persons with disabilities and minors, on racism, on asylum and trafficking, as well as specific courses for the students of the national school for judges on minors, took place from 2017 until today. Within this spirit, the Ministry of Justice has initiated a dialogue with the Administration of the National School of Judges for the modernization of the School's function, the enrichment of its syllabus and the continuous education and training of judicial officers. For example, the draft of Family Law reform provides for special programs within the National School of Judges for the training of judicial officers.

Furthermore, for the school year 2019, the Board of the national school of judges has included in the curriculum of judges and prosecutors, the course of special criminal law, where special emphasis is given on crimes of trafficking (including sexual abuse).

Especially for the training of prosecutors, a new unit has been established in year 2018, the "Office of International Relations and Lifelong Learning" of the Public Prosecutor's Office to the Supreme Court. Many training courses took place from 2017 to this date (not only addressed to prosecutors, in a number of cities in Greece, but also for students of the national school of judges), which were conducted following an agreement between the Prosecutor of the Supreme Court and ODIHR. Furthermore the above-mentioned Office organized a series of training courses, some of them with the collaboration of CEPOL, the CoE and OSCE (regarding several fields of criminal law, such as trafficking). For more details please see the Reply to the Recommendations. During 2020, a visit to the Pilot Institution "Lighthouse", was co-organised by the Ministry of Justice and the British Embassy in Athens (London, 16-17 February 2020).

### **Ministry of Migration & Asylum**

**-Asylum Service:** Training against THB is covered by EASO relevant module and respectively from

NRM. Two trainings with the use of EASO platform took place during 2021 and one from NRM. Primarily case officers and quality focal points have received such training, which is optional although well received by all participants. The content primarily refers to the legal status of potential victims of trafficking, the necessary legal path for their protection, ways of identification and good practices for dealing with such situations. The impact of these trainings is not assessed but we can understand from the requests derived from the field that it is highly needed.

**-Special Secretariat for the Protection of Unaccompanied Minors (SSPUAM):** Trafficking in human beings, is found to be under reported, constituting prevention techniques necessary for the protection of all minors. Gathering evidence and following conversations with professionals working with unaccompanied minors, informative seminars regarding detection, early signs and support in case of victimisation were found to be crucial and necessary for the prevention of trafficking in human beings. The SSPUAM -taking into consideration the urgent need to intervene by providing guidance and ensuring that professionals are qualified and trained- is currently in the process of establishing a series of training seminars to the experts of the accommodation shelters, where unaccompanied minors reside. Having planned the whole process in 2020, the first training was successfully completed by 10 speakers of the field (human trafficking experts, psychologists, lawyers, lecturers and police officers) in February 2021 with over 300 participants (psychologists, social workers, care givers, lawyers, teachers and interpreters), acting as the preamble for the following trainings. The participation was optional and the training was assessed in terms of the topics analysed and the selected speakers.

**Ministry of Citizen Protection / Hellenic Police** (indicatively)

- In the framework of the Greek Chairmanship of the Committee of Ministers of the Council of Europe, a three-day online workshop on the “Protection of migrant minors from all forms of violence” was co-organized by the Hellenic Police and the European Union Agency for Law Enforcement Training (CEPOL).
- CEPOL Webinar “The impact of the COVID19 lockdown on modi operandi in THB and the consequences for law enforcement”, 28/10/2020.
- CEPOL Webinar “Latest trends in child trafficking, including exploitation in forced criminality - Case study”, 06/11/2020.
- CEPOL Webinar “Gender-specific measures in anti-trafficking actions”, 17/06/2020.
- Participation of 140 Police Officers in a webinar on the “Annual Report on Trafficking in Human Beings in Greece - 2019”.

**Ministry of Labour and Social Affairs / General Secretariat for Demography Family Policy and Gender Equality (GSDFPGE)**

Two training programmes were conducted to the staff of the structures (Counseling Centres, Shelters, SOS helpline 15900) of the above mentioned "National Programme for the Prevention and Combating Violence against Women".

The first was funded and delivered, in three parts, by the NGO DIOTIMA- Centre for Research for Women’s Issues (CRWI) in cooperation with International Medical Corps (IMC), General Secretariat for Demography Family Policy and Gender Equality (GSDFPGE) and Research Centre for Gender Equality (KETHI), in Athens and Thessaloniki. The employees were trained over topics such as cultural diversity, psychological first aid, crisis management and trauma, referral system for refugee women victims of gender-based violence, asylum and international protection procedures, gender-based violence case management in humanitarian crisis situations, in accordance with international practices.

The second one was funded and conducted, in two parts, by the international organization UNFPA

(United Nations Population Fund) in cooperation with GSDFPGE and KETHI, in the island of Lesbos and island of Rhodes. The employees were trained over topics such as gender-based violence in emergencies, guiding considerations for providing safe shelter to refugee and migrant survivors of GBV, cultural diversity, strategies to effectively work with interpreters and asylum procedures.

A four-day training programme on violence against women -including trafficking-is provided to all counselors who work in the Counseling Centers, the Shelters and the SOS telephone helpline. The trainings are organized by the GSDFPGE and the National Centre of Public Administration & Local Government (Training Institute-INEP).

Within the frame of the "SURVIVOR: Enhancing Services for Refugee and Migrant GBV Survivors" 28 trainings were implemented with approximately 600 unique beneficiaries who are service providers or future professionals in the field of gender-based violence, and community members. Within the frame of "The EMPOWER REF "Empowering professional and refugee communities to detect, identify, address and prevent sexual and gender-based violence in Greece", 10 experiential training workshops were delivered (both online and in person) to front-line professionals working with the target group of the project, principally refugee women, in different accommodation facilities around Greece. The content of the workshops was tailored on the training needs of frontline professionals and it included sessions on identification, management and prevention of SGBV.

### **Ministry of Education**

According to Law 4547/2018, article 77, Refugee Education Coordinators (S.E.P.) are appointed in refugee reception centers or structures. The Refugee Education Coordinators are teachers of primary and secondary education who have been seconded in this position, upon their request, for one school year. During their term of office, the S.E.P.s are trained by the Institute of Educational Policy, the Special Scientific Committee of article 76 and are supported by the Independent Department of Coordination and Monitoring of Refugee Education of the Ministry of Education.

### **Special measures concerning children** (Articles 5, 10, 11, 12, 14, 15, 16, 28 and 30)

7. ***Please describe whether and how trafficking in children is specifically addressed in your country. If there are institutions responsible for taking the lead in combating trafficking in children and a specific national referral mechanism for child victims of trafficking, please provide details.***

The Greek NRM receives referrals of presumed adult as well as child victims. However, the NRM SOPs foresee **specific guidelines** in the case of child victims, while the respective data are processed and analysed separately from the adults' data (to identify trends and special needs).

By Law 4478/2017, special offices were created, called the "**Children's Houses**". Art. 227 of the Code of Criminal Procedure provides that children who are victims and witnesses of crimes of personal and sexual freedom, trafficking etc. are examined under a special procedure during criminal proceedings, in special offices called "Children's Houses". For more details, please see Q. 1.

With the establishment of the **Special Secretariat for the Protection of Unaccompanied Minors**, Greece now has for the first time a competent authority is in place for coordinating, monitoring and/or handling all matters that affect unaccompanied minors. Moreover, SSPUAM is in direct contact with authorities, agencies, actors and organisations working with and for unaccompanied minors, being in a

position to provide information from the field to the competent authorities and connect them.

The recently adopted National Action Plan on the Rights of the Child 2021-2023 is a comprehensive strategy for the protection of the rights of the child and includes the actions of the 12 bodies that form the "**National Mechanism** for the Development, Monitoring and Evaluation of Action Plans for the Rights of the Child", which was established by Law 4491/2017.

Also, the **NGO "Smile of the Child"**, an active member of the NRM, operates three hot/helplines, 24/7, 365 days/year, while one of them (116000) actually serves as an info desk for minor THB victims. With regards to the hotlines, the NGO runs TV spots and commercials but it also carry out interventions in schools where a specialized team of psychologists visit schools all around Greece informing students, teachers and educators on various phenomena, including THB and how to reach help through our hot/helplines. Lastly, "The Smile of the Child" runs the first European Platform for student volunteers where the volunteers are educated on various predicaments such as THB and how the hot/helplines can be valuable to them for their protection and support.

8. ***What practical measures are taken to reduce children's vulnerability to trafficking and create a protective environment<sup>3</sup> for them, including through:***

- a. ***ensuring registration of all children at birth, in particular from socially vulnerable groups;***

According to the procedure which was established by the Art. 62 L. 4554/2018 and regulated by the Joint Ministerial Decision 53033/672/2018, the police should meet in **maternity clinics** the mothers who lack any identity documents and verify their personal details. The procedure applied until now has proved to be of crucial importance to prevent illegal adoptions, aiming at the prevention of illegal adoptions. However, it is reportedly difficult to be fully applied in urban hospitals, as the completion of the procedure by the police requires a prolonged stay of the mother in overburden hospitals.

There are multiple factors that constitute **unaccompanied minors** a vulnerable population, with one of them being the lack of documents i.e. birth certificates from their country of origin. For this reason, the SSPUAM along with the competent authorities, i.e. Police and Reception and Identification Service, make every effort to leave no child unidentified and unregistered.

- b. ***raising awareness of THB through education;***

A program called «**Awareness Program About THB**», implemented by the **NGO A21** «Ending Injustice Into the World», has been approved by the Institute of Educational Policy for the last two years. This program aims at informing the school community on THB and modern slavery, reporting issues related to THB and contributing to initiatives against THB. A book entitled "Guide for Parents of Pupils of 6 to 12 years of Age" has also been approved in order to be disseminated through schools to parents and

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3 The concept of a protective environment, as promoted by UNICEF, has eight key components:

- protecting children's rights from adverse attitudes, traditions, customs, behaviour and practices;
- government commitment to and protection and realisation of children's rights;
- open discussion of, and engagement with, child protection issues;
- drawing up and enforcing protective legislation;
- the capacity of those dealing and in contact with children, families and communities to protect children;
- children's life skills, knowledge and participation;
- putting in place a system for monitoring and reporting abuse cases;
- programmes and services to enable child victims of trafficking to recover and reintegrate.



guardians of children of Primary school. This material will inform parents and guardians about THB and urge them to elaborate on it with their children and other relevant themes, the safe use of the internet being among them. After the implementation of the program an evaluation process follows, as it has to be accompanied by evaluation material, which will be completed by school teachers and / or students.

Furthermore, the Ministry of Education is launching a **sex education program** to be implemented in all schools in Greece. This is a necessary step towards creating a safe learning environment, where students know that they can report potential abuse cases, and can identify these abuse indicators in the first place. In this context, the ONR is co-operating with the Ministry of Education for a “train-the-trainers” projects with the aim to provide teachers with the necessary information on the subject. The project will be based on the following project ‘Human Rights for Beginners’.

The Ministry of Education has organized, with the support of CoE and the ONR, the project ‘**Human Rights for Beginners**’. The first training took place in January 2020 with the participation of approximately 150 teachers of Secondary Education. The project aimed to train educators on the Reference Framework of Competences for Democratic Culture of the CoE. This training is currently revised to include topics related specifically to THB (including comprehensive sexual education & reproductive health education).

The GSDFPGE is making partnerships with other relevant stakeholders in order to raise awareness and to combat gender stereotypes and gender social roles. GSDFPGE in cooperation with the Ministry of Education and the General-Maternity District Hospital “Helena Venizelou” in Athens, organizes seminars in schools to provide fundamental human rights, and sexual and reproductive health education.

The Institute of Educational Policy (IEP) undertakes and implements the following actions:

I. The Institute of Educational Policy (IEP) has served the general aim of educating children in the protection of human rights for many years. As of 2020, the IEP in cooperation with the Ministry of Education and Religious Affairs, has promoted the concept of supporting human rights through workshops and the development of skills, based on UN Sustainable Development Goals by introducing the pilot project “Platform 21+: Skills Workshops”. Within the framework of this pilot action, entitled “Skills Workshops”, new thematic cycles were introduced in Compulsory Education, namely “Well-being”, the “Environment”, “Social Empathy and Accountability”, and “Creative Thinking and Initiative”. The aim of this pilot action is to introduce the new Thematic Cycles/Workshops to the curriculum of Primary and Secondary (Compulsory) Education - on a permanent basis, integrate them into the compulsory school timetable – skill workshops that promote experiential and exploratory learning and develop learning skills (4Cs-Critical thinking, Communication, Collaboration, Creativity), life skills/soft skills, Information literacy, Media literacy, and ICT literacy.

Each Thematic Cycle/Workshop is comprised of sub-topics illustrated in Figure 1:



Specifically, with regard to THB, there are programs in the cycles of “Well-being” and “Social Empathy and Accountability”, which serve the goals of supporting human rights, mutual respect and diversity, volunteering, and, moreover, programs on sexuality education, sexual violence, sexual abuse and harassment, gender equality and other relevant themes. (<http://www.iep.edu.gr/el/psifiako-apothetirio/skill-labs>).

In addition to that, during the period June-December 2020, YPAITH/IEP put in action:

- A pilot curriculum for each thematic cycle/workshop, developed for all grades of compulsory education, starting from preschool education.
- An in-service e-training on organizing school climate and Action Plans, on teaching and learning methods for the promotion of 21st century skills through innovative experiential learning. The training and implementation of the action plans are about to scale up and reach a larger number of schools in compulsory education (primary and lower-secondary) as of September 2021.
- As regards Recommendations and material for democratic sustainable education, they are all being implemented in the context of the skill labs (<http://iep.edu.gr/el/psifiako-apothetirio/skill-labs>).

**II.** The Institute of Educational Policy, together with a Scientific Committee for the Support of the Refugee Education, have initiated and implemented since 2016-2017 an action plan for the education of refugee and migrant children. The curriculum and course schedule are still being implemented in the so-called Reception School Annexes. Its main objective is to ensure psychosocial support and integration of refugee children into the Greek educational system following a preparatory transitional period. The plan is differentiated according to the age group of the children and is adapted to the special needs and conditions of children, taking into consideration the types of accommodation of the refugee population, either “site-based” (i.e. population placed in refugee accommodation centres) or “off-site” (i.e. population residing in rented apartments, hotels or shelters). IOM ensures the transportation of children to and from the public primary and secondary schools and the refugee accommodation centres and provides children of primary school age with school kits, containing the necessary school materials.

**III.** The Institute of Educational Policy established a Workgroup under the title “Supporting school activities during 2020-2021 on empowering the prevention of gender violence and the protection of violations of sexual dignity within school units”(cf. IEP Administrative Board’s Minutes nr. 11/04-03-2021) in March 2021. Among the Workgroup’s aims are: a) the co-operation with the Scientific Unit of IEP “Skill Workshops and Sustainability”, b) the collection, evaluation of educational programs and their

posting on the website (in particular <http://iep.edu.gr/el/sex-education>), along with recommendations and other relevant material concerning sexual education, the generalization of the curriculum of the Skill Workshops with regard to sexual education, and furthermore, the special training of teachers of primary and secondary education on the aforementioned themes.

This IEP's website, provided for the development of sexual education in schools, contains material of related educational programs and Manuals/Guides which help professionals, teachers and other practitioners, to recognize the signs of sexual violation (as the Law 3500/2006 under Article 23 provides) and deal with it. More information can be found on this website about ways to report the facts to competent bodies, etc. So, anyone working in school units etc, can have access to resources such as the CONVEY program of the Greek NGO "The Smile of the Child", the material of the Research Center for Gender Equality in collaboration with UNICEF, which contains the book: "The World From The Beginning" with stories of girls who are victims of sexual violence, one of them being a refugee, etc.

**IV.** Furthermore, the Greek IEP also supports the Ministry of Education and Religion Affairs and its supervised bodies on issues concerning the implementation of a number of **educational programs in school units**. All these programs are checked in terms of scientific validity and pedagogical suitability within the framework of a specific Guide, which has been prepared by the IEP for the approval of such programs (cf. IEP Administrative Board's Minutes nr. 9/20-02-2020). Educational programs include activities, competitions, workshops, etc, and indicatively aim at: promoting the rights of the child, defending the rights of vulnerable social groups, raising awareness in relation to social contribution and volunteering, enhancing public and individual mental and physical health, as well as well-being, promoting respect for diversity as well as cultural diversity, strengthening experiential approach to knowledge, etc.

**c. *training professionals working with children.***

NRM trainings have also targeted the professionals of child protection actors, namely local and international NGOs, focusing among others to the proper communication with children, the children's exploitation and its indicators.

The SSPUAM has also initiated a series of training to the professionals working with unaccompanied minors. The training acts as a prevention mechanism, tackling human trafficking at an early stage by enhancing the knowledge and skills of professionals to detect and respond promptly and suitably, connecting them with the competent services. The first series of seminars to professionals working with minors in the accommodation houses (psychologists, social workers etc), was successfully completed in February 2021 with the support of the ONR.

The Institute of Educational Policy (IEP)/Ministry of Education undertook under the "Skill – Workshops" pilot project, mentioned above, from June 2020 to December 2021 an in-service e-training for 2,500 teachers of 218 schools (58 kindergartens, 58 elementary, 58 secondary and 44 model schools) on organizing school climate and Action Plans, on teaching and learning methods for the promotion of 21st century skills (4Cs, mind/ digital/ life skills), as well as inquiry and participatory inclusive learning methods.

Raising awareness of THB in education can be achieved through the programmes of:

- the "Flexible Zone of Interdisciplinary and Creative Activities", where actions are implemented that concern cultural, environmental and health issues as well as the personal development of the student.
- in the context of the "School Activities" (Ministerial Decision No. 4867 / Γ2 / 28-08-1992 (Government Gazette 629 B') as amended and in force.

It should be mentioned that the implementation of actions to raise awareness of the school community and society in general on issues of acceptance of any form of diversity is a key responsibility of the Centres for Educational & Counselling Support “K.E.S.Y” (article 7 of Law 4547/2018) & the Interdisciplinary Educational Evaluation and Support Committees “E.D.E.A.Y” (article 10 of Law 4547/2018)

9. ***Please explain what methods are used to verify the age of a presumed victim of trafficking where the age is uncertain and there are reasons to believe that the person is a child. Would such a person be presumed to be a child until the age verification is completed?***

Regarding unaccompanied minors entering Greece, in cases of ambiguity as for the age of the individual, an age assessment is conducted according to the provisions of the Joint Ministerial Decision 9889/2020. Until the age is confirmed by the conduction of the age assessment, the individual is presumed to be a child. The age assessment process is composed by three stages, clinical, psychosocial and medical assessment and it is aimed to be as less intrusive as possible.

10. ***What steps are taken in your country to ensure that the rights of the child and his/her best interests<sup>4</sup> are duly taken into consideration, in particular when it comes to***

a. ***identification of child victims of trafficking;***

Please see NRM SOPs at Q. 27.

b. ***appointing a legal guardian, organisation or authority which shall act in the best interest of unaccompanied minors identified as victims of trafficking;***

The **Law 4554/2018** has outlined the role and competence of a legal guardian of unaccompanied minors, regulating the representation of stateless children or of foreign origin. The process of appointing a representative / guardian is based on prioritizing unaccompanied / separated minors with criteria of vulnerability or urgency of action. In an effort to secure minors’ best interests, an interdisciplinary approach is being implemented at all important phases of a child’s life or case. Due to the vulnerability of a child victim, it is ensured that an authorized by the Public Prosecutor representative is appointed to ensure that the needs of the minor are met, to connect the minor with all the necessary agencies or professionals and conduct a Best Interest Assessment (BIA). The criteria taken into account are: the age of the unaccompanied minor, gender, living conditions and medical-psychological vulnerabilities.

More specifically, the responsibilities of the guardians/ representatives include the care, representation and assistance of the minor to ensure their individual and social rights from the moment of their arrival. Subsequently, the Reception and Identification Service, the Hosting Structures, the International Organizations, the Civil Society Organizations that provide support services inside and outside the Reception and Identification Centers, etc. continue to provide their services and the guardians/ representatives are those who have the overall oversight and care of the case and the needs of the minors. They are present in all the administrative procedures that concern the minors, take care of the support of the minors from the moment of their arrival at the entry points and inform them about their procedures, rights and obligations. They also assist them in the process of recording their data, ensure their connection to the national child protection system and other services and constitute the reference

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4 “The best interests of the child” means that any situation should be looked at from the child’s own perspective, seeking to take the child’s views into consideration and with the objective of ensuring that his/her rights are respected. Any decision concerning a child should therefore be guided by what is objectively best for that child, given her/his age and maturity.

point or link between the minor and these services.

The competent Authority - the National Centre for Social Solidarity (EKKA) - has entered into an agreement with the NGO Metadrasi (until August 2021), which has deployed professional guardians. In the first four months of the project, 1155 unaccompanied minors were represented by 57 representatives across the country. The project is funded by the "National Program for Asylum, Immigration & Integration Fund (AMIF) 2014-2020" and is implemented within the responsibilities of EKKA, as defined in Laws 4554/2018 and 4756/2020, regarding the provision of representation/guardianship to unaccompanied or separated minors living throughout the country.

*According to the Law 4756/2020, "the Directorate of Child and Family Protection of the Ministry of Labour and Social Affairs in collaboration with EKKA take the necessary measures in order to ensure the provisions of Law 4554/2018 (AD 130) about guardianship, or the representation of unaccompanied or separated minors. The National Center for Social Solidarity may delegate the responsibilities and powers of the representation to a legal entity (NGO) responsible for and the well-being of the unaccompanied or separated minors. In this case, the legal entity necessarily indicates a natural person, to perform the duties of representative. The role of the representative is in particular the protection of the unaccompanied or separated minor in all administrative and judicial proceedings for which has been authorized by the prosecutor, active participation in decisions affecting the life of the minor, the right of the minor to integrate into the new environment and their preparation for future situations that will face".*

The objectives of the project are: the safeguarding of the individual and social rights of unaccompanied / separated minors through the provision of a guardianship / representation, based on special authorizations by the competent Juvenile and First Instance Prosecutors.

Also, the SSPUAM is aiming to mainstream the implementation of BIAs (Best Interest Assessment), by providing clear guidance and delivering trainings of the professionals conducting them. According to law 4251/2014 article 50, in cases where there is a human trafficking victim from a third country, it is crucial to establish that the individual is unaccompanied or/and his/her family is untraced in order to proceed with the acquirement of the necessary measures for its legal representation.

**c. *locating the child's family;***

According to NRM SOPs, the safe return of a child victim is ensured, making all necessary steps prior to it, with the cooperation of all competent actors and the mediation of the NRM management Organization (i.e., EKKA), if considered necessary (mainly to get in contact with NRM actors of the other country). The NRM SOPs foresee a risk assessment in regards to the contact with the family, taking into consideration possible involvement of the family members in the child's recruitment, transfer or exploitation.

**d. *ensuring that the identity or details allowing the identification of a child victim of trafficking are not made publicly known through the media or by any other means;***

According to Art. 352B of the Penal Code and Art. 67 of Law 4478/2017, the private life of a child victim of abuse is protected. The legislator has any right to proceed to charges to any individual who is found responsible for sharing personal information that can lead to the identification of the victim. For more details, please see Q. 27 on NRM SOPs.

- e. ***access to appropriate and secure accommodation, education and health care;***

Please see Q. 27 on NRM SOPs.

As regards unaccompanied minors, SSPUAM makes every effort to ensure that all unaccompanied minors are provided with secure accommodation and they have access to education and health care, taking into consideration their needs and best interests. Specifically, regarding accommodation, the Accommodation and Relocation Unit of the SSPUAM is responsible for handling the requests for accommodation and concrete criteria are set in order to prioritise and act promptly in cases of vulnerable minors or minors in danger.

- f. ***issuing residence permits for child victims of trafficking;***

Please see Q. 39 on the two types of residence permits, stipulated in Law 4251/2014. There is no special provision for issuing residence permits for child victims of trafficking, so the general provision is applied.

- g. ***providing counselling and information in a language that the child can understand, legal assistance and free legal aid prior, during and after legal proceedings, including to claim compensation;***

According to NRM SOPs, interpretation must be provided to ensure proper understanding of the procedures and effective communication. Social Agencies that work with refugee population ensure the provision of interpreters. Additionally, interpreters to basic refugee languages are provided to health care units as well as in shelters and counselling centres for women victims of violence. For more details, please see Q. 27.

- h. ***carrying out best interests determination, including risk assessment, prior to any decision on the return of child victims to their country of origin, and ensuring the child's safe return in accordance with the best interests of the child;***

Please see Q. 27 on NRM SOPs.

- i. ***special protection measures for children.***

Art. 227 of the Code of Criminal Procedure provides that children who are victims and witnesses of crimes of personal and sexual freedom, trafficking etc. are examined under a special procedure during criminal proceedings. It stipulates that the aforementioned victims are examined in special offices called "**Children's Houses**". (For more details, please see Q. 1)

**11. *What practical measures are taken in your country to identify victims of trafficking among unaccompanied foreign minors, including asylum seekers? What measures are taken to prevent their disappearance? Have there been cases of non-voluntary return of child victims of trafficking?***

During 2020, an emergency response mechanism was being developed to address the urgent need for the identification, registration, accommodation and support of unaccompanied minors who are either homeless or live in precarious conditions. The emergency response mechanism consists of a **tracing**

**and protection mechanism** that was officially established in April 2021, with a 24/7 helpline; emergency accommodation facilities and a comprehensive case management. With this initiative, unaccompanied minors including victims of trafficking are now able to contact the hotline requesting shelter and assistance. The Mechanism is the result of a wide collaboration of stakeholders, namely the Special Secretariat for the Protection of Unaccompanied Minors, UNHCR, IOM and NGOS.

12. ***What programmes and services exist in your country for the (re)integration of child victims of trafficking? What solutions are provided if the reintegration of the child into his/her family is not in the child's best interests?***

Please see NRM SOPs at Q. 27. Child victims of trafficking are protected within the country's child protection system and enjoy all rights and services provided to children in danger of social exclusion, victims of abuse/ neglect and/or unaccompanied children, depending on their special needs and family status in Greece.

## C. Questions related to specific articles

### Definitions (Article 4)

13. ***Have any difficulties been experienced in your country in identifying and prosecuting cases on the ground of trafficking for the purpose of forced labour or services, slavery and practices similar to slavery or servitude? If so, please provide details.***

The National Action Plan 2019-2023 foresees several capacity-building training projects for front-line professional, such as Labour Inspectors, on THB-issues and in particular on training inspectors to identify indicators of forced labour and participate in joint simulation based exercises with the Police, the NRM and other stakeholders. This strategic objective is against the backdrop of a very difficult identification situation in part because exploited workers are often reluctant to identify themselves as victims, preferring to work in poor conditions rather than return to their home countries. Another drawback that the NAP attempts to address is the difficulty to make the distinction in practice between an employment dispute and a THB-case.

14. ***How does your country's law define "abuse of a position of vulnerability" and what are the criteria for evaluating the vulnerability of a person subjected to THB? Please provide any relevant examples where the means used in THB offences involved an abuse of a position of vulnerability.***

According to the revised Art. 323A para. 2 PC, the penalty of the THB offence is also imposed if a perpetrator has obtained the consent of the THB victim by using fraudulent means or by misleading him / her, taking advantage of the vulnerable position in which he / she is found.

In the aftermath of the ECHR's judgment on *Chowdury and Others v. Greece*, an appeal in cassation was lodged by the Prosecutor of the Greek Supreme Court against the judgement which had been brought to the ECHR. The Supreme Court judgment No. 2/2019 fully complied with the Article 4 of the Council of Europe Anti-Trafficking Convention, according to which THB does not require absolute enslavement, total deprivation of the victim's liberty or the constant and uninterrupted placement of the victim under the perpetrator's control in order for the victim to be considered in a vulnerable situation. The Court considered that the vulnerable position, exploited by the perpetrator, consists of a situation of need, weakness or danger, in which a person has fallen, due to the economic, personal, social and other problems they face and because of which situation they have no other real and acceptable choice, except to succumb and accept their exploitation. This broad interpretation of THB is now settled case-law in Greece.

Furthermore, it was accepted that the individual is in a vulnerable position, within the meaning of that provision, when she/he is in a situation where she/he is unable to self-protect important legal goods, such as her/his life, physical integrity or freedom, so that she/he has no other real and acceptable solution and choice than to be seduced and subjected to abuse. Not every behavior of the perpetrator, by which she/he affects the will of the victim to such an extent that the victim himself, consents to divest himself, to surrender, that is, her/his freedom to the sphere of influence of the offender.

The NRM reporting form classifies under the choice "abuse of a position of vulnerability" the following fields: Bad economic situation/ Problematic family situation (e.g., domestic violence, single -parent family)/ Irregular stay in the country/ Lack of social skills (e.g., not knowing the language, illiterate)/ Personal disappointments/ Inability to travel on their own/ Hiding information about their whereabouts/



Full dependence on the exploiters for their living/ Exploitation of a bad history with the Authorities Under the choice “other”, characteristics like “pregnancy” or “underaged” victim, “disability”, “homelessness”, “lack of support network” have also been reported by the Reporting Actors.

**15. To what extent does your country’s law recognise the relevance of forced marriage and illegal adoption to THB offences? Please provide any examples from case law where forced marriage and illegal adoption were considered in the context of THB.**

Forced marriage is a distinct typology of THB which is punished according to Art. 323A PC. Prior to the extensive amendment of the Article 323A in 2019, the purpose of forcing the victim into marriage was already in 2018 an element of the specific nature of the human trafficking offence, according to the relevant provisions of the Council of Europe Convention on the Prevention and Fight Against Violence Against Women and domestic violence, which was ratified by L. 4531/2018.

Illegal adoptions constitute a criminal offence according to Art. 360A PC. If a person adopts a child with the aim to engage them in dangerous labour activities, they are punished with a prison sentence of minimum 1 year and a fine (in case a more grave offence is not applicable). Also, a prison sentence and a fine are imposed in case a person offers their child for illegal adoption or mediates in such an act so as to gain an illegal benefit. However, it should be noted that illegal adoption is a separate criminal offence and does not constitute a THB typology.

**16. Can forced begging be considered as a purpose of THB according to your country’s law? Have there been any cases of child trafficking for forced begging with the involvement of the child’s family or legal guardian?**

Forced begging is a distinct typology of THB which is punished according to Art. 323A PC. Increased cases of forced begging of minors have been recorded, according to the latest Report of the National Referral Mechanism for the year 2020: 73 child-victims of forced begging in a total of 167 reports of potential victims of trafficking, as opposed to 35 child-victims in 2019. Many victims were referred to the NRM from Thessaloniki in Northern Greece, mainly due to the street begging from Bulgarian, Romanian and Greek children, usually of Roma origin.

The involvement of families in the exploitation of the children as perpetrators/facilitators makes their identification as THB victims more difficult. To mention a recent case, two couples of Bulgarian nationality were prosecuted in Northern Greece, for forcing their children into begging and exploiting their “earnings”. According to the charges, they forced children to beg on the streets of Thessaloniki, and look for food in the garbage. The arrests were made after a four-month investigation by the city’s Police Anti-Trafficking Unit.

**17. Can the exploitation of criminal activities be considered as a purpose of THB according to your country’s law? Please provide any examples from case law.**

By the new provision of Article 323A PC, as it was amended by the new Penal Code law, the definition of the concept of ‘exploitation’ is broadened to include –in addition to the already provided forms of exploitation in Article 323A- the commission of criminal acts (forced criminality). In 2019, 2 minor THB-victims referred to the NRM for forced begging, were also victims of forced criminality.

**Prevention of THB** (Article 5)

18. ***Is the impact of awareness-raising campaigns and other measures to prevent THB evaluated and how are the results taken into account? Please provide copies of any impact evaluation reports.***

There is no quantitative data for a total measurable evaluation. Having said that, in pre-COVID-19 era, Break the chain & Raise your Voice Festivals gathered more than 3.000 participants annually in Athens. There is also an increasing interest in ONR's social media accounts, (e.g. facebook). ONR's publications as also interviews, articles etc. in the press are attracting the attention of the wider public.

19. ***How does your country promote and fund research on THB and use its results in the development of anti-trafficking policy? Please provide examples of recent research.***

A legal research is included in the transnational project "A4: Crossing borders for effective police investigation to protect female victims of sex-trafficking and enhance accountability mechanisms", funded through the Call: ISFP-2019-AG-THB (Call for proposals on joint action against trafficking in human beings addressing the culture of impunity) and is going to start in June 2021; this project is being implemented by the National Centre for Security Studies (KEMEA- Ministry of Citizen's Protection), and Greek partners are the National Centre for Social Solidarity (EKKA- NRM managing authority) and The Themistocles and Dimitris Tsatsos Foundation – Centre for European Constitutional Law (CECL). The research aims at addressing gaps in the police investigation and the court hearings, as well as in the respective legal interpretation, which may result in the impunity of the perpetrators of THB offenses; it will also identify best practices applied in the criminal procedures.

Furthermore, the ONR has filed, through the Ministry of Foreign Affairs, an official request to secure funding for 5 targeted studies on THB. Part of the implementation of the National Action Plan against THB 2019-2023 is included in the Operational Programme "Public Sector Reform", which is funded by the EU Regional Development Fund (ERDF) and the European Social Fund (ESF). The Call will be centred on supply chains and Local/Regional Government, mapping training needs in social structures and public services, expertise of front-line professionals, evaluation of existing services and proposals in the field of combating THB, new tech applications and THB in relation to money laundering. The studies will serve as a basis for the production of information and educational material, which will be further disseminated to stakeholders during targeted meetings and information days.

20. ***How do your country's migration legislation and policies seek to prevent THB by enabling lawful migration?***

Foreign third-country nationals without legal residence and work documents are more likely to be at particular risk of being trafficked and forced to work, given the economic and social exclusion they experience. For this reason, the framework on enabling seasonal workers to work legally in Greece is prescribed by Law 4251/2014 "Immigration and Social Integration Code", along with Joint Ministerial Decisions 30825/4.6.2014 and 66224/2015. More particularly, seasonal workers from non-EU countries may apply for a visa which is issued for the purpose of seasonal work (Art. 18 para 1a'). The visa is ratified by one of the 7 Decentralised Administrations of the country with a maximum duration varying from 6 months to one year.

21. ***Please describe the measures taken in your country to prevent THB for the purpose of the removal of organs, and in particular.***

a. ***the legislation and regulations on organ transplantation and removal of organs,***

***including requirements for the living donation procedure (information/consent, evaluation/selection, follow-up and registry) and criteria for authorising centres for living donation;***

In 2011, the Greek Parliament approved a presumed consent (opt-out) law for deceased donation (Law 3984/2011). Living donation, previously including only close relatives had been extended to donors with a close and stable emotional relationship. This process includes a confirmation of the donor's motivation by a court decision. The Law 3984/2011 fully adopts the EU Directive 2010/53/EU on organ exchange, traceability, quality and safety assurance, transports, graft and donor characterization, adverse events management, organ exchange, international agreements etc. A further legal change had been made to the allocation system in 2014 and a National Transplant Registry had been implemented at the same time. Moreover, an update of waitlist management has been implemented that distinguishes between "active" (medically suitable) and "inactive" (medically unsuitable recipients).

According to Art. 15 of L. 3984/2011, organ transplantation is carried out by "Transplantation Centres" which are authorized by the Ministry of Health to operate within public hospitals or non-profit healthcare institutions. Ministerial Decision Y4a/36538/2012 further stipulates the conditions under which the 3-year and renewable permit is granted, regarding qualifications of personnel involved in transplantation activities, as well as protocols and operating procedures related to organ transplantation. The Transplantation Centres must submit annual reports to the Hellenic Transplant Organization about its activities.

Also, a Legislative Committee has been set up in the Ministry of justice for the ratification of the CoE Convention No. 216 against Trafficking in Human Organs.

- b. ***the institution(s) in charge of overseeing and monitoring the medical care and recovery of donors and recipients and managing or supervising any waiting lists for organ transplantations;***

The Hellenic Transplant Organization (HTO) has been established in 1999. The core competence of HTO is to promote, raise, coordinate and control organs and cells donation and transplantation. HTO consults the Ministry of Health to introduce legislation over donation and transplantation issues. Also HTO embodies the national central coordination department and is responsible for the national and supra-national coordination and allocation of organs, cooperating directly with the ICUs and the Transplant Clinics and the Transplant Organizations and Transplant Centers of European Countries.

- c. ***the guidance and training provided to relevant professionals to prevent this form of THB, to report cases and to identify and assist victims.***

All the Health Regions (YPE) across the country participate in NRM and specialized NRM SOPs for Health Care Units have been compiled. Also, the health care units' personnel participate in NRM seminars regularly. In addition, the MoUs signed between the ONR and the Regional Governments of Attica and Thessaly include the training of the healthcare front-line professionals of the respective Regional Government, in cooperation with the NRM training team.

**Measures to discourage the demand** (Article 6)

22. ***What preventive measures to discourage demand that fosters different forms of exploitation has your country adopted, in particular in the areas of:***

a. ***educational programmes;***

Please see Q. 8.b on educational programmes.

b. ***information campaigns and involvement of the media;***

Raising general awareness to sensitize society and to reduce 'demand' for services or products extracted from THB victims is key to the Greek national policy against THB. First of all, articles and interviews of the National Rapporteur in the **press, audio-visual and digital media** were published in an effort to raise awareness against THB to the wider public opinion of Greece (eg. Kathimerini, To Vima, Efimerida twv Sintaktwn, ERA 1st FM, SKAI, ANT1, Alpha radio etc). Also, the ONR actively uses social media (facebook, instagram, twitter) in an effort to reach younger audiences, communicate its work and raise awareness on THB issues. In many cases, the social media had more than 9.000 views.

A digital media campaign in collaboration with **UNICEF Greece**, entitled "Making the invisible, visible" ("Κάνοντας το αόρατο ορατό") was promoted in social media (Facebook, Instagram, Twitter), on the occasion of the Human Rights Day on 10 December 2020.

Two awareness-raising webinars took place during 2020, facilitated by **EKKA**. The one regarded LGBTQI+ persons in relation to THB and the other regarded two researches (of UNODC and UNWOMEN) on the impact of COVID-19 to THB.

In April 2020, a video spot has been created as part of the central campaign of the Greek Government "We Stay at Home", with the message "**We stay at Home but We Don't Stay Silent**" in order to raise awareness on the difficult situation for women victims of violence during the lockdown and promote the specialized structures the SOS Helpline, the Counseling Centers and the Shelters.

In 2020, the **NGO A21 Greece** organised a number of awareness and prevention events, which were mainly online events due to the pandemic. A21 reached a total of 4,207 people with a human trafficking prevention message and a total of 2,450 with an awareness message. On October 17, A21 organised a global online event, the Global Freedom Summit, with more than 100,000 people across 71 countries taking part in organising local events.

**Raise Your Voice Festival** was held as an online event in 2020 and 2021 with the aim to raise awareness on THB and climate change. The Festival consisted of different sections: Human Rights Workshops against THB, a series of discussion panels, Human Rights Stories through a selfie-video, as well as an art & costume exhibition.

GSDFPGE co-funded in cooperation with the Office of the Greek National Rapporteur on Trafficking in Human Beings and other agencies the "**Break the Chain**" festival, in order to raise awareness and inform people over the phenomenon of trafficking of human beings.

Please see our Reply to Q. 12 of the Recommendations on awareness campaigns made prior to 2020.

c. ***legislation (including in the areas of public procurement, disclosure requirements and anti-corruption);***

In regards to the legislative framework, which regulates public procurement, there is the exclusion clause of “human trafficking free” supply chains, meaning that such entities, which are found to be involved in human trafficking, are excluded (art. 73 para.1 L. 4412/2016 on public contracts, as amended by the L. 4782/2021) from public procurement.

d. ***involvement of the private sector.***

Public-Private Partnerships to pursue anti THB objectives, demand reduction and due diligence on private sector supply chains is a strong component of the ONR strategic outlook. As a result of the ONRs consistent strategy to identify unusual partners beyond the imperative competency of law enforcement and welfare stakeholders, major private foundations plus major private sector stakeholders have started to include HR including THB as a priority in their Calls for proposals and generally in their corporate identity. Towards this directive, the ONR co-organized several projects. Prime examples of this endeavor to introduce path- breaking synergies is the support of Hellenic Petroleum to HR for Beginners, their annual academy training dedicated to Business and Human Rights, the Bodossakis Foundation call for Proposals that is dedicated to HR Education , including anti THB and sexual and reproductive health education, the active involvement of Aegean Airlines and the Athens International Airport in the anti-THB project co-organized by the ONR and the Civil Aviation Authority, the awareness raising project Break the Chain held in the Athens Transport Network, etc.

The aforementioned MoUs between the ONR and the Regional Governments of Attica and Thessaly promote ‘due diligence’ in their supply chains so that the Regional Governments do not purchase goods produced or contract services provided by THB-victims.

The ONR has filed, through the Ministry of Foreign Affairs, an official request to secure funding for 5 targeted studies on THB. One of the five studies is a Situation Analysis and Best Practices on Supply Chains & Local / Regional Authorities. The study will serve as a basis for the production of information and educational material, which will be further disseminated to Local and Regional Authorities and companies on targeted meetings / information days.

23. ***Please describe the measures taken in your country to prevent trafficking for forced labour or services, inter alia, by means of labour inspection and labour administration, monitoring of recruitment and temporary work agencies, and monitoring of supply chains.***

Although part of the inspections conducted in 2020 and 2021 focused on monitoring the implementation of measures to deal with the COVID-19 pandemic (e.g. business suspensions), Labour Inspectorate continues to carry out its audit work - in terms of proper implementation of labour law - and in cases of violations (eg non-payment of wages, undeclared work) proceeds to the imposition of the relevant sanctions. In addition, the informational and advisory role of Labour Inspectors is proving to be particularly critical in the current context. Due to the high risk of labour exploitation at the private employment agencies, inspections are planned annually and continuously throughout the country for Private Employment Offices.

In the years 2017 to 2019, the Greek Labour Inspectorate in the context of the implementation of the joint action plan of inspections with other authorities, carried out joint inspections with the Hellenic Police to combat trafficking in human beings for the purpose of labor exploitation.

GRETA’s Compendium of good practices in addressing trafficking in human beings for the purpose of labour exploitation was forwarded to all the Public Prosecutor’s Offices in Greece by the Prosecutor of

the Supreme Court and it was translated in Greek for further dissemination.

Also, the Regional Governments of Attica and Thessaly have committed to adopt, in the MoUs signed with the ONR, "due diligence" provisions in their supply chains and public procurement.

A two-day regional conference on preventing THB through government procurement practices and measures, took place in Athens in 2019. The conference, organized by the OSCE, in partnership with the City of Athens, the Office of the National Rapporteur on Trafficking in Human Beings, the Athens Partnership and Bloomberg Associates, brought together over 200 participants from 15 countries. Procurement and anti-trafficking experts, representatives of the city, regional and national governments, members of international Organisations and civil society discussed how governments can help prevent human trafficking and labour exploitation in their supply chains.

### **Border measures** (Article 7)

**24. Please describe the specific measures taken in your country to strengthen the capacities of border guards to prevent and combat THB, in particular as regards:**

**a. identification of possible victims of THB in the context of border control;** Members of the Coast Guard personnel have participated in NRM seminars.

**b. identification of possible perpetrators of THB offences;**

**c. gathering of first-line information from victims and perpetrators;**

**d. identification of vulnerable persons in need of international protection among possible victims of trafficking.**

In order to further enhance the victim identification and addressing THB-cases, police officers serving in the "Frontline" Services at the border, are regularly trained, either nationally or through European or international organizations (Frontex, Europol, FRA, IOM etc.). At the national level, the Directorate for Border Protection / AEA implements updated trainings, focusing, inter alia, on risk analysis, human rights, "screening and debriefing".

In addition, the Public Protection Directorate of the Hellenic Police Headquarters analyses the relevant cases that have been investigated by the competent Services, and the conclusions drawn focus on the dimensions of human trafficking (forms of exploitation, indications of victims / perpetrators / cases, ways of actions, etc.).

Based on the above findings, relevant training is provided to "front line" Service personnel (including border guards), who have a high probability of encountering potential victims / perpetrators / cases of recruitment and trafficking in human beings for the purpose of exploitation.

Through the above-mentioned trainings, information / awareness of these personnel regarding human trafficking is achieved, the ability to analyse facts and behaviours is optimized, in order to identify possible cases of cross-border crime, including human trafficking.

Finally, the information that is "extracted" through the "debriefing procedure", which is carried out with the assistance provided by FRONTEX, is also being exchanged with Europol for further analysis and utilization.

**25. What measures have been taken to ensure that the personnel employed by commercial carriers, including airline attendants and staff working on other means of transportation by land**

***and sea, are able to detect possible victims of THB and inform relevant bodies in due course?***

The airport community participates in the NRM, and has been agreed to jointly work on the development of NRM SOPs tailor-made to their operation protocols.

**Hellenic Civil Aviation Authority** participates with a subject matter expert in ICAO's Working Group for Combating Human Trafficking in the aviation sector. This WG aims at developing a comprehensive facilitation-related strategy, thus enhancing ICAO Annex 9 Recommended Practices and ICAO A40-15 Resolution for combating trafficking. Training personnel to recognize and report suspected instances of human trafficking by using survivor-informed training materials is one of the key subjects included in this comprehensive strategy. The Report of the WG and relevant proposals have been finalized and are included in ICAO FALP/12 deliberations (July 2021).

HCAA has also established a network of focal points of involved stakeholders (competent authorities, airport operators and air carriers, so as to promote coordination and cooperation in developing policies and protocols for responding to suspected incidents of human trafficking. During conferences and workshops (virtual), organized by the National Rapporteur and aviation stakeholders, the content and the needs of aviation personnel in direct contact with the travelling public have been identified.

Also, the training of airport community in Thessaloniki Airport "Makedonia" is a pillar action included in the **Memorandum of Understanding** recently signed between the **ONR** and the **NGO A21**. The MoU also includes the production and distribution of information material in the airport.

***26. What measures have been taken to promote co-operation between border control agencies as regards the establishment and maintenance of direct channels of communication? How have these channels been used for detecting transnational THB? Please provide examples of cases in which these channels were used and any difficulties encountered by border control agencies in this context.***

Cooperation between the competent border control authorities takes place on a daily basis. Especially in the islands, where Reception and Identification Centers operate, the cooperation is close and permanent. This cooperation results in the exchange of information (through official channels), regular meetings of national authorities with the presence and active participation of all relevant Bodies and Services (Frontex, Europol, NGOs), thus expanding the "Networking", enhancing cooperation and contributing to the further improvement of efforts to identify victims / perpetrators / cases of trafficking in human beings at the border. Finally, information "extracted" through the "debriefing procedure", where required, via Europol or Interpol channels, is communicated to all countries concerned.

For this purpose, the "**Guest Officers of Europol**" are permanently stationed on the 5 relevant islands and in the area of Greek-Turkish land borders since 2016, implementing the National Operational Plan to combat cross-border crime. Through the Guest Officers, who work with the relevant police and port Authorities, all information collected from migratory flows in the "second line", is communicated to Europol and to all relevant national law enforcement authorities in order to identify possible cases of cross-border crime.

A **bilateral agreement between Greece and Albania** on the establishment and operation of a **Joint Contact Centre** for Police and Customs Co-operation in Kakavia was signed at the Kakavia border crossing, Northern Greece. Deputy Minister of Citizens' Protection, Eleftherios Oikonomou represented the Greek side, while Deputy Interior Minister Ardian Hodaj represented the Albanian side. The signing of the Agreement was also attended by the Deputy Minister of Interior of Albania, in charge of anti-

trafficking issues, Ms. Romina Kuko. This security center will enhance the exchange of information between the two countries and the coordination on matters pertaining to trafficking in persons, illegal migration, and other forms of organized crime.

**Identification of the victims** (Article 10)

**27. *Is there a national referral mechanism (NRM) or an equivalent system for identification and referral to assistance of victims of trafficking, both nationals and foreigners, for any form of exploitation? If so, please specify the bodies involved in it and their responsibilities. If an NRM existed in your country at the time of the first evaluation, please indicate any changes that have been made to it in the meantime.***

**NRM**

Following the provision of art. 6 para. 7 L. 4198/ 2013, the **Joint Ministerial Decision 30840/2016** regulated the Establishment and Operation of the National THB victims' Identification and Referral System (**NRM/ EMA**), which is being managed and operated by **EKKA (National Centre for Social Solidarity)** and coordinated and supervised by the **Office of the National Rapporteur against Human Trafficking**.

It is worth mentioning, that art. 58 para. 5 L. **4636/2019** on *International Protection and other provisions* establishes the obligation of the competent authorities to inform NRM upon identification<sup>5</sup> of a human trafficking victim.

NRM's competence includes:

- **Collection of victims' protection requests** (identified by any public Actors or NGO, not necessarily officially recognized as victims<sup>1</sup>)
- **Monitoring of cases**
- **Creation and operation of the victims' protection requests Registration System** (reliable statistics)

**The Greek NRM was first launched on 1<sup>st</sup> January, 2019** and has already published two annual reports, available here:

2019 report available in English: <https://sway.office.com/CZCIIh5PWFObbhQn>

2020 report available in English here: <https://sway.office.com/bBLKrHSqmaXHHALM?ref=Link>

The NRM support team in EKKA, along with actors active on the field, have developed the NRM tools through thematic (each representing a protection stage) Working Groups during the period 2016-2018: 1. The Reporting Form, the Instructions Manual for filling in the Reporting form (including a Glossary of Terminology), 2. a Victim's Consent Form template and 3. a Protection Services Provision Monitoring Form, in regard to the cases that have been referred to the NRM, as well as 4. a monitoring tool for penal proceedings, which is being shared by the NRM legal advisor with the lawyers who handle the respective cases. The NRM tools are available at <https://drive.google.com/drive/folders/1f5GRgzE7gUgo-w8lrROyDFAVarynGME1?usp=sharing>.

Also, the NRM SOPs were drafted by these working groups, specifying what each procedure entails, who are the main actors and professionals involved and when and how it takes place:

1. Identification and Initial Referral to the NRM
2. Assumption of the case by the "Reference Actor" (namely, the designation of a Protection Actor which will be responsible for handling the case of a presumed human trafficking victim, after his/her accession to the NRM.

<sup>5</sup> When according to the victim's trafficking history, it comes out that at least one action took place, using at least one of the means, with the purpose of exploitation of any form, the victim is identified as a presumed victim and referred to NRM. In case of a minor victim, the use of any means is irrelevant.



3. First Level Protection
4. Social Integration or
5. Safe Return or Resettlement to a Third Country

Moreover, specialised SOPs were created for Health Care Units of the National Health System as well as for the public service of the Reception and Identification Centres of Greece adapted to their internal specific circumstances, with the participation of those Agencies' representatives.

It should be noted that according to the Greek NRM SOPs, the officially recognized victims and the presumed ones are included, regardless of when and where the offence of human trafficking took place, as long as protection services linked to their trafficking experience are currently provided to them. The primary aim of the NRM is to ensure the respect of the basic rights of the victims, as well as their protection, along with their access to the proper agencies for assistance and services.

In this regard, the NRM Reporting Form includes all the necessary information (e.g., pregnancy) that is required for the holistic assessment of each victim's vulnerability and the detection of additional needs. Moreover, the specific details of each case (e.g., the most frequent means used for each act) may be a base for understanding the phenomenon in each period, in order to develop raising awareness and prevention activities.

During 2019 and 2020, 321 victims of human trafficking were referred to the NRM. Each referral is followed by direct contact of a member of the NRM Support Team with the Agency professional who had completed each Form and preferably had direct communication with the victim. Through this communication, specific data of the completed form are clarified, referral and protection alternatives are suggested and challenges in case management are discussed, always respecting the victim's anonymity.

Further monitoring of each case is foreseen in the NRM standardized procedures (SOPs) by the submission on a quarterly basis of the "Protection Services Monitoring Form".

The first – Level protection Services, which according to NRM SOPs should be available and accessible upon the identification of a victim of human trafficking, depending on their risk and needs assessment, are:

Health care, Material assistance, Legal counselling and representation, accommodation, psychological support and social support. If the presumed victim is a child, specialised protection services for children and assistance for appointing a guardian should be delivered. Interpretation should be available for victims of foreign origin, for the deliverance of the services above.

Health care refers to response to immediate health problems, assessment of the victim's physical health situation, PEP kits if relevant (for raped victims) and health examinations if needed for sheltering the victim in a shelter.

Material assistance includes the provision of food and non-food items, like clothing.

Legal counselling and representation refer to information provision regarding the victim's rights, arrangement of the victim's legal status (if of foreign origin), access to the asylum procedure or the procedure of THB victims' residence permit issuance, support throughout the criminal procedures, support with the procedure of the THB victim's official recognition (by the prosecutor) and the procedure of claiming a compensation.

Accommodation includes shelters for THB victims or victims of violence, housing facilities for asylum seekers or refugees etc.

Social support includes escorting to services, signposting to protection services and navigation of the victim throughout any necessary bureaucratic procedure before administrative authorities, according to the individualized plan.

Psychological support includes the psychological assessment along with the risk and needs assessment and followingly the development of a healing or counseling intervention, which aims also to the prevention of re-victimization. If necessary, the victim is referred to a psychiatrist.

Integration services include the assistance in finding a job, language lessons, vocational training and rehabilitation, school enrollment and drug rehabilitation programmes.

Assistance in voluntary return includes not only the travelling of the victim back to their country of origin, but their interconnection with protection services there, in order to be safe in case of return. (A child's repatriation demands a former Best Interest Determination process).

An analytical description of the aforementioned types of protection services' mapping for each operating procedure has been processed and is going to be included to the **NRM handbook**, which was prepared by the EKKA/NRM support team and will soon be printed in greek and in english language.

#### Liaison with actors (indicative presentation of collaborations)

The EKKA/NRM team has developed a close collaboration with the Education Department of the **Reception and Identification Service** (RIS), in order to ensure the stable and systematic participation of RIS and RIC staff in the trainings.

The collaboration with the **Asylum Service** Educational Department has been exemplary, because the asylum case-workers have been systematically referring cases to the NRM. The added value of the curriculum we have developed is connected to its national character, presenting the national legal framework of Human Trafficking.

The EKKA/NRM team has been also in close collaboration with the International Organization for Migration (**IOM**), in terms of the latter's awareness raising activities and staff trainings that are already planned for the near future.

The EKKA/NRM team has been developing a collaboration also with the **Civil Aviation**, responding to their request for support in forming Standard Operational Procedures for THB cases at the airports.

The EKKA/NRM legal Advisor has been also running a **Legal Professionals NRM working group**, which is organizing advocacy interventions in regards to criminal proceedings for human trafficking cases. This working group has sessions via the zoom platform once a month and it is working/focusing on gaps in relation to the criminal proceedings.

The procedure of inviting more actors to participate in the NRM is ongoing. Until now 42 Civil Society Organisations have accepted the National Rapporteur's invitation and numerous state agencies that might detect, identify and/or provide protection services to a victim of trafficking in their everyday practice (see NRM participating actors list in the 2020 report available in English here: <https://sway.office.com/bBLKrHSqmaXHHALM?ref=Link>).

#### NRM operation: promising practices.

- The National Referral Mechanism has been in operation since the beginning of 2019. NRM has already published two annual reports which for the first time give an overall picture of the THB victims' protection in the country. (2019 report available in English here: <https://sway.office.com/CZCllh5PWFObbhQn>

and 2020 report available in English here: <https://sway.office.com/bBLKrHSqmaXHHALM?ref=Link>)

- The recent (valid since 1/7/2019) legal amendments in the Penal Code (especially in regards to the more complete definition of human trafficking crime) were achieved with the joint efforts of the Office of the National Rapporteur, along with the EKKA/NRM team and a circular for Prosecutors of first-instance regarding foreseen practices in victims' official recognition, was issued by the Supreme Court Prosecutor, adopting the National Rapporteur's recommendations.

- The Greek NRM has been invited to participate in public awareness raising campaigns, festivals and social events including thematic theatrical plays, thematic art exhibitions, anti-trafficking festivals, as well as running a workshop directly with the target group of women potential VOTs, in cooperation with an INGO. The EKKANRM team publishes regularly Newsletters, communicating NRM achievements with a broader audience. (Newsletters available here: <https://drive.google.com/drive/folders/1MmfmkXkNFrkLM33OqXiL4w3pS9Lklce1?usp=sharing>)
- Following the above and along with our constant effort for gender mainstreaming, the EKKANRM team organised and facilitated a webinar at 30th June 2020, with the title: LGBTQI+ individuals and human trafficking; Rights and Protection dimensions.
- Furthermore, since the COVID-19 pandemic has altered the EKKANRM team's way of performing our duties, the way NRM is functioning, but also the trends in THB and most importantly the lives of THB victims, we started contemplating on the pandemic's impact on THB. These reflections led to the organization and facilitation of another webinar on the 18th of November 2020 entitled "Human Trafficking and the COVID-19 pandemic. Consequences and challenges" with guest speakers from UNODC and UN Women.
- One of the fundamental good practices, on which NRM was structured, is the **working groups** that were formed before the NRM started operating and have been working on NRM preparation and operation for three years now, coordinated by the NRM/EKKA support team. In the working groups all actors involved in the protection of victims of trafficking in Greece including governmental bodies, NGOs, International Organisations and INGOs and participate with representatives – their so called "NRM focal points". The purposes of the working groups are:
  1. to report good and bad practices,
  2. to evaluate the applied tools of the NRM,
  3. to get direct feedback from people in the field who offer services to victims of trafficking and refer them to NRM and
  4. to enhance the collaboration amongst actors involved.
  5. to examine and monitor the function of the mechanism in a national level, During the preparation period before the launch of NRM, thematic working groups formed the NRM tools (reporting and protection monitoring forms and SOPs), as mentioned above. Through the operation of the working groups the standard operation procedures were created as another good practice, in order to be followed by all actors on the ground, which may identify victims of trafficking and offer services to them. The SOPs – integrated in the actors' mandate and operation protocols - are applied on a national level and they constitute concrete steps of basic case management and proper referral pathway for identified VOT, focusing on the protection of their human rights and their overall well-being.
- Moreover, as already mentioned, **specialised SOPs** were created for Health actors (Public Hospitals etc.) as well as for the public service of the Reception and Identification Centres of Greece (in the islands with Hot Spots and mainland) adapted to their internal specific circumstances.
- It is a necessity for the field staff of the involved actors to be trained and sensitized in order to ensure early identification of VOTs, and appropriate case management or proper referrals. For that purpose, the NRM's additional good practice is to do capacity building trainings for field workers, on a regular basis, not only in the urban centers but covering also different areas around Greece, including islands with RICs and mainland, as mentioned previously. The focus of these trainings is to raise awareness to field workers on:
  - a. the signs for identifying a VOT,

- b. the effective ways to communicate and work with VOTs through experiential learning,
  - c. to familiarize with the legal framework for human trafficking in the EU context as well as in the national one,
  - d. to present and get familiar with the NRM tools and SOPs.
- A core value of the NRM which is reflected also in the capacity building trainings, is to keep it *intersectional* through encouraging participation of several different actors in each training, so as to promote harmonized practices and mutual learning from each other, the smooth cooperation and creation of a communication path among actors of different services, with the aim to achieve a holistic approach of combating human trafficking. During the trainings a good practice is also to create space for communication and open discussion with professionals on the ground, understand their views and get direct feedback from them on what is actually taking place when working with and referring VOTs, what the challenges and possible solutions are, so as to bring it within the working groups later on and work on it along with the other partners of NRM. Finally, the trainings of NRM are flexible in a way that are able to be adapted to cover the needs of separate NGOs or public services.
  - In order to achieve those results, another good practice of the Greek NRM is to establish stable **partnerships** with private actors. One of these actors is NORCAP/Norwegian Refugee Council with which the National Center of Social Solidarity as a public institution, has created a MoU and had deployed three experts-staff members to the team of NRM, strengthening the capacity of it, two anti-trafficking advisors and a legal expert. The NRM has had also cooperation with European Asylum Support Office (EASO) for the facilitation of capacity building trainings of the Greek Asylum Service case-workers in Attica and with Fundamental Rights Agency (FRA) for their participation in the trainings that took place for the RICs in the Greek islands.
  - Finally, what is found to be effective in practice is the procedure of monitoring the reported to the NRM cases, with direct guidance and communication with the professionals involved. This procedure, as the referral of the identified cases, is conducted with coded data in order to ensure protection of the victim's privacy, every three months and its purpose is to record the management of the cases and through it guide the professionals, coordinate actors and as NRM to understand the challenges as well as the patterns of human trafficking in Greece. As a procedure of good practice, it aims also to enhance provided protection services and advocate the victims' right to have access to the services they need and to which they are entitled to.

28. ***Are there any formalised indicators for the identification of victims of THB for different forms of exploitation and how is their use by different professionals ensured in practice in your country?***

Indicators for human trafficking victims' detection is a permanent part of the training curriculum and a non-exhaustive list of indicators is included in the NRM handbook, which is ready and soon will be published (funded by the ISF project).

29. ***What is considered as "reasonable grounds" to believe that a person is a victim of THB and which bodies have competence to identify victims upon "reasonable grounds"? Please***

***provide examples from practice.***

See question 27 as to how a presumed victim of trafficking is defined. The detection and identification process are for any participating to the NRM Organisation to be prepared to follow in field practice, according to its SOP's.

**30. *What measures are taken in your country to encourage self-identification of victims of THB?***

The Hotlines that operate in Greece and address to victims of violence (incl. THB-victims) are: "15900" (General Secretary for Demographic Policy, Family Affairs and Equality of Sexes), "1109" (NGO A21 Campaign), "197" and "1107" (EKKA-National Centre for Social Solidarity), "1056" (Smile of the Child).

Also, Greece has participated in the first EU-wide campaign on prevention of THB developed by the European Crime Prevention Network (EUCPN). The main goal of the campaign was to provide information on THB victims about their rights, national hotlines, protection etc in an effort to encourage self-identification and enhance victim protection. The content (posters and videos) was adjusted to Greek. (October 2019).

Implementing the Joint Action Plan signed with the ONR, IOM Greece distributes leaflets and posters in all accommodation sites of IOM work so as to raise awareness on the THB risks and enhance self-identification of THB victims among the asylum seekers or migrants. The material is available in 8 languages, English, Greek, Arabic, Farsi, French, Lingala, Somali and Sorani and is addressed at adults, children and the Municipalities involved in integration.

The NRM, operating within the National Centre for Social Solidarity, is planning to publish information leaflets on THB, which address to the beneficiaries of the Protection Actors involved – both children and adults (also funded by ISF).

**31. *What measures are taken in your country to identify victims of THB during the examination of asylum applications and during return of persons whose applications are rejected? How is communication ensured between the authorities responsible for identification of victims of trafficking and immigration and asylum authorities when there are reasonable grounds to believe that a person who is irregularly staying in the country is a victim of trafficking?***

Art. 58 Law 4636/2019 on "International Protection and other provisions" (transposing EU Directive 2011/95/EU) stipulates that special attention is devoted to vulnerable groups, explicitly including THB-victims. Also, para. 5 of Art. 58 establishes the obligation of the competent authorities to inform NRM upon identification of a THB-victim. In practice, asylum case-workers have been systematically referring cases to the NRM.

Please see above information on trainings for the asylum case-workers. In addition, Health Units SA, the actor responsible for the social support in detention centres, participates in NRM and members of its staff have received training and been familiarized with the NRM tools.

**Protection of private life (Article 11)****32. *What measures are taken by relevant professionals to protect the confidentiality of information and protect the personal life and identity of victims of THB, including as regards***

***storing of their personal data? Are there any conflicts of interest between professional ethics, on the one hand, and the obligation to report an offence, on the other hand? If so, how are these conflicts resolved in practice?***

There are various legal provisions, regulating the citizens', police officers' and public officers' obligation to report a crime to the police or the prosecutor.

According to art. 37 para. 1 Criminal Proceedings Code, all **police officers** are obliged to report any ex officio persecuted offense (human trafficking crimes fall under this term), of which they become aware.

According to art. 37 para. 2 Criminal Proceedings Code, all **public officers** are obliged to report any ex officio persecuted offense (human trafficking crimes fall under this term), of which they become aware, while exercising their duties.

According to art. 232 Penal Code, any citizen who omits to report any ex officio persecuted felony (crimes with sentence above 5 years), is being sentenced with imprisonment up to 3 years, if the crime is committed or attempted.

There are also several provisions regulating the confidentiality obligation of professionals like social workers, doctors, lawyers, nurses, psychologists etc., which may be lifted on specific conditions, like human trafficking crimes and especially against minors.

**Assistance to victims** (Article 12)

33. ***When assistance to victims is provided by non-state actors, how do your country's authorities ensure compliance with the obligations under Article 12 of the Convention, in particular when it comes to:***

- a. funding;
- b. victim's safety and protection;
- c. standards of assistance and their implementation in practice;
- d. access to medical treatment, psychological assistance, counselling and information;
- e. translation and interpretation, where appropriate?

As mentioned above, the P.D. 233/2003 foresees the human trafficking victims' rights as follows:

- Measures for the security of the victims and the places they reside,
- Police assistance in victim's transportation,
- Access in education and vocational training,
- Access in health care,
- Interpretation and
- Legal aid.

In addition, the art. 12 L. 3064/2002 foresees the victims' protection from deportation.

Furthermore, the L. 4251/2014 provides for the issuance of a reflection period up to 3 months (and up to 5 months for minors), during which similar rights are foreseen, as the above ones and the right to be granted a **residence permit**.

Apart from the victims' rights, which are guaranteed regardless of their involvement in criminal proceedings, a series of rights during criminal proceedings is being foreseen under **L. 4478/2017**, which transposed the Directive 2012/29/EU on establishing minimum standards on the rights, support and protection of victims of crime.

The NRM SOPs and training curriculum have been developed based on the above provisions, to the direction of ensuring the THB victims' access to the rights' they are entitled to.

34. ***What specific measures are taken to ensure that the provision of assistance to victims of THB who have been issued a residence permit for the purpose of their co-operation in the investigation or criminal proceedings is not made conditional on their willingness to act as a witness?***

Please see Q. 41.

35. ***What accommodation is available for victims of THB (women, men and children) and how is it adapted to the victims' needs?***

Two shelters one in Athens (for women victims of sexual exploitation) and one in North Greece (for women victims) operate in Greece. 19 shelters for women victims of violence (incl. trafficking victims) operate in various Municipalities all around the country. NGOs, such as A21 Greece, are also running accommodation and day-centers for the protection and psycho-social support of THB victims. Although no shelters specifically for male victims of trafficking operate in Greece, male victims may have access to temporary accommodation solutions (e.g., hotel voucher) in terms of NGOs shelters.

36. ***What measures are taken to ensure that services are provided to victims on a consensual and informed basis?***

According to the law 4478/2017 for the integration of directive 2012/29 /EU on the establishment of minimum standards relating to **rights, support and protection of victims of criminal activities**, the purpose is to ensure that victims of crime are properly informed, supported and protected in order to participate in the criminal proceedings. Victims are recognized and treated with respect, sensitivity, individuality, professional and non-discriminatory approach irrespective of race, colour, national or ethnic origin, language, religion, social status, political or other opinion, property status, age, gender, sexual orientation, gender identity or characteristics, disability or any other situation, in any contact with the competent victim support services or restorative justice services, where this is provided for by law or any other competent authority acting under the procedure. The rights set out in this law shall apply to all victims without discrimination, irrespective of their national or ethnic origin and of their residence status.

According to the article 68 of the above-mentioned law, an individual assessment is provided of the victim to identify any specific protection needs in order to assess whether and to what extent the victim may benefit from special protection measures during the criminal proceedings as provided for in Article 69, to avoid the risk of being subjected to secondary and repeated victimization, intimidation and retaliation. The individual assessment shall take into account in particular: (a) the personal characteristics of the victim, such as age, race, colour, religion, nationality or ethnic origin, sexual orientation, gender identity or characteristics or disability, residence, communication difficulties, affinity or other dependence on the perpetrator, as well as the history of previous victimization.

**37. *Is there any follow-up provided after the termination of assistance programmes? Can victims continue to receive assistance, where necessary and taking into account their specific needs resulting from the type of exploitation (including the removal of organs), after the termination of criminal proceedings, and if so what type of assistance?***

The provision of protection services is irrelevant to the criminal proceedings (PD 233/2003). Please also see Q. 27.

### **Recovery and reflection period** (Article 13)

**38. *Please specify in which cases a recovery and reflection period can be granted and who is entitled to it (nationals, foreign nationals). Please describe the procedure for granting a recovery and reflection period, the assistance and protection provided during this period, and any difficulties encountered in practice.***

Reflection Period - Article 49 of L.4251/2014:

1. Third-country nationals that have been characterised as victims of trafficking in human beings or migrant smuggling in accordance with the provisions of points (k) and (l) of paragraph 1 of this Code, provided that they do not fall within the provision of Article 1(2) of PD 233/2003, are granted a reflection period of three months by act of the competent Public Prosecutor, in order to escape the influence of the perpetrators of the offences against them and to recover so that they can take an informed decision as to whether to cooperate with the criminal authorities.

2. Especially with regard to minors – victims of trafficking in human beings or migrant smuggling, the same deadline may be extended for two more months by decision of the competent Public Prosecutor and on the criterion of the minor's best interest

3. During the period until the expiration of the deadline of the reflection period, the persons of the



abovementioned paragraphs are not removed from the country. A return decision that has been issued but not executed is suspended.

4. By decision of the competent prosecution authority, the deadline of the reflection period can be terminated prior to its expiration, in case that:

- a. The relevant prosecution authority ascertains that the victim reconnects actively and voluntarily with the trafficking perpetrators with the perpetrators of the crimes of article 1 (ia) & (ib) of this Code or when the elements that were taken into account in order the person to be characterised as victim of trafficking according to the provisions of article 1 (ia) and (ib) finally are not present
- b. It is necessary due to reasons of public order and public security.

There has been no application of the respective provision.

### **Residence permit** (Article 14)

39. ***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.***

The Greek Law provides for two possibilities when it comes to the issuing of renewable residence permits to victims of trafficking: Granting a residence permit on humanitarian grounds or on the basis of the victims co-operation with the authorities in the investigation or criminal proceedings.

Article 19A of the Immigration and Social Integration Code (L. 4251/2014) provides for the possibility of granting, by Ministerial decision, a residence permit for humanitarian reasons to third-country nationals who are victims of trafficking not cooperating with the competent authorities, on condition that the person concerned has been formally identified by the competent prosecutor as a victim of trafficking.

The residence permit is of one year's duration, entitles the holder to access to the labour market, and it can be renewed for two years each time, on the condition that the relevant criminal proceedings continue. If criminal proceedings are not pending, the residence permit is renewable for one year.

According to NRM data, the legal provision that the THB victim's residence permit is issued on the sole requirement of the official recognition of the THB victim as such, by the Prosecutor, is being applied in Greece (see Q. 41).

40. ***When a residence permit is issued for the purpose of co-operation with the competent authorities, how is "co-operation" interpreted and what does it consist of in practice?***

In addition to the provision explained above (humanitarian grounds), a THB victim can also be granted a residence permit on the basis of his/her co-operation with the authorities. The "clear intention to co-operate" is in practice disclosed in the testimony under oath of the victim during the criminal proceedings. This intention must be met with two more conditions: the presence of the THB victim in Greece facilitates the investigation or criminal proceedings, and the THB victim has broken off all contact with the perpetrators (Articles 52 and 53 L. 4251/2014).

41. ***What measures are taken to ensure that a residence permit is provided to victims of THB***

***in compliance with the obligation under Article 12.6, which states that the assistance to a victim of trafficking should not be made conditional on his or her willingness to act as a witness?***

There has been one case according to NRM data, for the period 2018-2019, that a THB victim was officially identified as such by the prosecutor, without any criminal proceedings pending (the offenses limitation period had passed). The application for a residence permit has been already submitted and the Ministry's decision is pending. It is worth noting that the certification of the supporting documents' submission is *in lieu* of a residence permit until the issuing of the aforementioned decision.

### **Compensation and legal redress** (Article 15)

42. ***Please indicate any measures taken since the first evaluation report to promote effective compensation of victims of THB, in particular when it comes to:***

***a. access to information on the relevant judicial and administrative proceedings in a language the victim can understand;***

According to Law 4251/2014, art. 51 (3) as regards trafficking victims during the reflection period the competent prosecution, judicial and police authorities shall, in accordance with the relevant provisions, give priority to the provision of translation and interpreting services where they have no knowledge of the Greek language, for their information regarding their rights and the services provided, as well as for the provision of all necessary legal assistance.

***b. access to free legal assistance and legal aid during investigations and court proceedings;***

Victims of certain crimes (domestic violence, slavery, trafficking in human beings, kidnapping of minors and other serious crimes, children victims of rape, sexual exploitation, etc.) are provided with free legal aid irrespective of their income. In such a case, a lawyer is appointed to the person concerned, who will represent them and will receive payment by the State. Any other legal information needed, will be available to the person concerned by the competent persons of the authorities (e.g Prosecutors).

Victims of crimes prosecuted *ex officio*, among which victims of hate speech, are exempted of the obligation to pay a fee for the initiation of criminal proceedings. Finally, for victims of domestic violence who ask for the precautionary measures to be applied, legal aid is granted provided that they cannot afford even provisionally the judicial expenses (art. 22 Law 3500/2006).

### ***Compensation***

***c. compensation from the perpetrator;***

***d. compensation from the state;***

***e. compensation for unpaid wages to victims of trafficking.***

***Please provide examples of compensation awarded and effectively provided to victims of THB.***

Law 4689/2020 has extended the level of protection granted to the THB victims with regards to their right to seek compensation. The most important amendments are the following: (a) the THB victim is no longer required to reside within the EU in order to receive the compensation (see Q.44), (b) the victim has a greater period to report the criminal act to the authorities, namely 3 months instead of 5 days, otherwise he/she is excluded from the right to seek compensation, (c) the Compensation Authority must examine the case within three months of the date on which the application is lodged, and must

give its final decision within three months of the date of assessment of the application, and (d) the fee which is levied for submitting the application is 50 euros, (instead of 100 euros according to the initial provision).

The right to seek compensation is stipulated in Article 3 of Law 3811/2009, which transposed Directive 2004/80/EC relating to compensation to crime victims. THB victims are eligible to claim for compensation by the State (public authorities) mainly a) when, following an irrevocable conviction, the offender lacks the financial means required to satisfy the above claim, b) when, in case of prosecution initiated against a person or persons unknown, the offender cannot be identified, c) when the offender cannot be prosecuted due to the prosecution having been terminated by order of the competent Public Prosecutor and d) when, due to an irrevocable acquittal decree, issued by the competent Judicial Council, or an irrevocable acquittal decision issued by the Court, there can be no penalty imposed on the alleged perpetrator.

Law 3811/2009 was further amended with Law 4531/2018; In particular, Article 4 para. 1 expands the costs covered by such compensation to include the mental and psychological support of the victim when there is no corresponding public structure at his place of residence or residence. It also covers the costs of changing the environment and housing and, in particular, the costs of moving and buying the necessary consumer goods so that victims of violence can be relocated to a safe environment away from the abuser. Finally, Article 4 para. 3 sets out a period of 4 months within which the applicant and the Greek state may appeal to the Administrative Court of First Instance against the decision of the Greek Compensation Authority. The establishment of a longer period than that laid down in the Code of Administrative Procedure is intended to make it easier for victims of violence to have access to justice.

Moreover, reference should be made to the general provisions of Law 4239/2014 on “Just compensation for exceeding the reasonable time of proceedings in Civil and Penal Courts as well as the Court of Audit and other provisions”. More specifically, by the above Law, the parties’ right to claim just and reasonable compensation for exceeding the reasonable time of proceedings in Civil and Penal Courts as well as the Court of Audit has been established, as the latter (i.e. the reasonable time of civil and criminal proceedings) has been interpreted by the European Court of Human Rights. All interested parties claiming that the proceedings lasted beyond the reasonable time required to diagnose the factual and legal issues raised at the trial may exercise the aforementioned right.

Simplifying the procedure of granting compensation to THB victims is one of the main goals of the Working Group which was recently set up within the Ministry of Justice. Also, the low number of applications shows the lack of proper information on this issue.

**43. *What specific measures are taken to make available the assets of traffickers to provide compensation (for example, effective financial investigations resulting in seizure of assets of perpetrators with the view to their confiscation)?***

In addition to Art. 16 par. 3 of L. 4635/30.10.2019, Art. 63a of Law 4478/2019 was added which provides that, according to the Code of Penal Procedure (CPP), assets that were seized during the penal procedure and the Court decision assigned them to the victims, they are immediately returned to them with no further delays. Article 373 CPP stipulates that the reserved assets that derive directly or indirectly from a criminal offence and are considered pecuniary detriment of the victim are attributed to the victim.

**44. *Is there a possibility for victims of THB to claim damages and compensation in the***

**country of destination after their return to the country of origin? Please provide any relevant examples.**

As mentioned above, the provisions on victims' compensation have recently been amended. Art 54 of the Law 4689/2020 stipulates that THB-victims are entitled to compensation not only when the crime was committed in the EU territory, but also in third country's territory. No such cases have been registered yet.

#### **Repatriation and return of victims** (Article 16)

**45. What steps are taken to ensure that the return of victims of THB from your country to another country is carried out preferably voluntarily and in full observance of the duty to ensure their rights, safety and dignity, including the obligation not to return a person to a country where his or her human rights are at risk of being violated (non-refoulement principle)? How is risk assessment carried out when deciding upon return and repatriation of victims of THB? What is the procedure and what are the modalities of co-operation with the authorities of the receiving state?**

The NRM SOPs specify that assistance in voluntary return includes not only the travelling of the victim back to their country of origin, but their interconnection with protection services there, in order to be safe in case of return. (A child's repatriation demands a former Best Interest Determination process).

IOM runs an Assisted Voluntary Return and Reintegration programme to which any eligible beneficiary could apply and be voluntarily returned to his/her country. It happens that among beneficiaries we identify or receive referral of victims of trafficking who are requesting to be returned and apply for the project. The risk assessment of such cases is carried out by Counter-Trafficking or Gender equality expert. The benefits received once registered in the programme (voluntary and upon request from beneficiaries): 500 euros in cash as cash grant, logistical support of return (tickets, issue of travelling documents etc.) and priority to be provided with reintegration plans (1,500 euros in kind).

**46. Has any victim of trafficking who is a citizen or permanent resident of your country been returned against their will? If yes, what steps, if any, were taken to assist them after their return?**

No such case has been registered.

#### **Corporate liability** (Article 22)

**47. Have there been any developments in your country's law regarding corporate liability for THB offences? Does corporate liability apply to legal persons involved in THB for the purpose of forced labour or services, including by their sub-contractors throughout the supply chain? Please provide examples of any relevant cases and the sanctions imposed.**

Legal persons can be held liable for THB offences (incl. forced labour) according Art. 3 Law 4198/2013, which transposed the EU Anti-trafficking Directive 2011/36/EU. No such case has been registered yet.

#### **Aggravating circumstances** (Article 24)

48. ***Have there been any prosecutions and convictions for THB with the aggravating circumstance of involvement of public officials in the exercise of their functions? Please provide any relevant examples.***

No such cases are registered.

**Non-punishment provision** (Article 26)

49. ***Is the non-punishment provision incorporated in law and/or prosecution guidelines? If so, please provide the relevant texts. Please give details, including references to case law where relevant, of cases where the non-punishment principle has been applied and the outcome of such cases.***

A new provision has been introduced with the new Penal Code in article 323A PC. According to **paragraph 8**, the Misdemeanours Prosecutor, (with the approval of the Appeal Prosecutor), may temporarily suspend criminal prosecution for violations of the Migration Law and for prostitution, as well as for offences involving their participation in criminal activities, of a person who reports that criminal offences have been committed against him/her, provided that such participation was a direct consequence of the fact that the person was victim of human trafficking. If the complaint is found to be well founded, refraining from prosecution becomes definitive.

The Code of Criminal Procedure expanded the scope of protection for THB-victims by introducing a legislative provision for definitive refraining from prosecution of the perpetrators of certain offences (unlawful entry into/exit from the country, possession and use of travel documents, identity cards, residence permits or other counterfeit or genuine documents issued for another person, illegal work, prostitution), provided that s/he was a THB-victim and traffickers have been irrevocably convicted. (Article 59 CCP par. 4 and 5).

For more details, please see the Reply to Recommendation No 26.

**Ex parte and ex officio applications** (Article 27 in conjunction with Article 1.1.b)

50. ***Does your country's law provide for the possibility of investigating a THB case in your country if the offence was committed on your territory, but the complaint was submitted in the country of residence of a foreign victim of THB? Please provide any relevant examples.***

Criminal proceedings are initiated by the Public Prosecutor of the First Instance Court. The Public Prosecutor opens criminal proceedings after receiving information that a criminal offence has been committed (notitia criminis). Considering that Trafficking on Human Beings is a serious crime (felony) and not a misdemeanour, the Prosecutor may start criminal proceedings **ex officio** (Art. 37 CCP) if he/she is informed on the offence by any other means, such as through Interpol or Europol channels, or if the victim's complaint was submitted abroad. (Please also see Q. 57 on police international co-operation).

51. ***Please describe the measures taken in your country to ensure compliance with the obligation of effective investigation into THB cases, in particular as regards:***

- a. ***setting up specialised investigation units and the number of staff involved;***

- b. exchange of information with, and obtaining evidence from, other parties;*
- c. use of special investigative techniques (such as informants, cover agents, wire-tapping, controlled deliveries), with an indication of how their use is regulated and whether they can also be applied in cases not related to organised crime;*
- d. investigation of THB offences committed through the Internet, including the possibility of blocking websites which are used to facilitate the recruitment of trafficking victims or the dissemination of child pornography;*
- e. financial investigations to disrupt criminal money flows and ensure asset recovery;*

In relation to the investigative procedure for the detection of criminal offences of trafficking in human beings, the overcoming of the evidential difficulties associated with the nature of such cases shall be achieved by carrying out the **specific investigative actions referred to in Article 254 CPP**. In particular, for the criminal act of human trafficking the investigation may include the carrying out of:

- (a) a covert investigation, in which the investigating officer or private person acting under his instructions, offers to facilitate the commission of any of the crimes of para. 1, which the perpetrator of the crime in question had pre-decided. The conduct of the covert investigation is under the supervision of the prosecutor of criminal courts, and for the actions of the disguised actor or private person a detailed report is drawn up.
- (b) investigative penetration, during which an investigative officer with disguised identity data undertakes transactional duties in a criminal or terrorist organization with the purpose of investigating its structure, the disclosure of its members, as well as the verification of the crimes of par. 1, the commission of which the members of the organization had previously decided.
- (c) controlled transport
- (d) removal of the confidentiality of the content of communications or their location and movement data, with the observance of the guarantees and procedures of Articles 4 and 5 of N. 2225/1994.
- (e) recording of activity or other events outside the home using audio or video devices or other special technical means.
- (f) correlation or combination of personal data.

The special investigative actions of controlled transfers, the removal of the confidentiality of communications or location and movement data and the correlation or combination of personal data, can be imposed against a third person not participated in the offence uninvited, in order to reveal the identity of the accused or the place of residence or her/his residence and if it is technically impossible to verify these data in any other way.

Thus the Greek legislation provides the pre-investigation and investigative officers with appropriate investigative means for the detection and effective investigation of human trafficking cases in order to ensure their evidential foundation before the judicial authorities that decide about the perpetrators.

In relation to the speed of the procedure: provision is made for the priority of the trial of human trafficking cases directed against minors, the absolute priority conduct of the interrogation and the termination of the investigative procedure by the Council of misdemeanours.

Regarding the special prosecutors who handle human trafficking and trafficking cases, we would like to mention that by act of the Prosecutor to the Supreme Court and the Director of the Athens Prosecutor's Office, competent Prosecutors for cases related to human trafficking are appointed to the Prosecutor's Office to the Supreme Court and the Prosecutor's Office to the Court of First Instance respectively. Further in the prosecutor's Office to the Court of First Instance in Thessaloniki with a

corresponding act of the Director of the Prosecutor's office, Prosecutor is appointed responsible for the general supervision of organized crime cases, which also deals with human trafficking cases.

**f. use of joint investigation teams (JITs).**

A4 PROJECT provided for the creation of 7 Inter-regional Joint Investigation teams (1 per each of the 7 targeted Greek Regions: 5 in Northern Greek Border Regions, 1 in Central Greece and 1 in the Region of Attica), composed mainly of the 162 trained by the same project police officers, allocated to the JITs according to the geographical distribution of their services of origin. In addition, JITs to be formed are expected to include Border Guards, with a focus on those performing investigations, Custom Officers focusing on those serving in Judicial Customs Department as well as Passport Control Officers in the crossing points of the Northern Border Regions of the country. The aim of A4 JITs is the enhancing of multiagency cooperation among key-professionals carrying out investigations.

**52. Have you had any cases or suspected cases of THB for the purpose of the removal of organs? How did investigations take place in such cases and what special investigation techniques were used?**

In September 2019, the Organized Crime and Human Trafficking Sub-Directorate of Thessaloniki in collaboration with the Thessaloniki Juvenile Protection Sub-Directorate dismantled a multi-member criminal organization, whose members trafficked egg cells, mediated in the adoption of children and recruited surrogate mothers.

In this operation, which was developed in various areas of Thessaloniki, about 80 police officers of the Security Directorate of Thessaloniki participated, while units of EUROPOL and the Sub-Directorate of Criminological Investigations of Northern Greece also assisted in the case. The operation led to the arrest of 12 people, while a case was filed against a total of 66 people involved in the case.

**Protection of victims, witnesses and collaborators with the judicial authorities** (Article 28)

**53. What measures are taken to protect victims, witnesses and NGOs assisting victims during criminal proceedings from potential retaliation or intimidation during the investigation and during and after the criminal proceedings? In how many cases have special protection measures been used in respect of victims and witnesses of THB? Please specify any difficulties in providing victim/witness protection and creating a safe environment for their participation in investigations and court proceedings.**

Example by the NGO A21 regarding a case in November 2020: The anti-trafficking police department of Athens had displayed a willingness to encourage victims to assist in the investigation and prosecution of trafficking by setting up a 'victim-centred room' for potential victim interviews. This initiative by the Athens' anti-trafficking police exemplifies a willingness to employ a victim centred approach by treating the survivor as a victim of a crime rather than an accomplice, perpetrator, or just a witness. A second 'victim-centered room' is scheduled to be created in the anti-trafficking unit in Thessaloniki in 2021.

There is margin for improvement, in regards to the proper and harmonised application of the relevant legal provisions. In one case reported, the victim was invited to testify as a witness, at the same time with the perpetrators.

**54. What other measures are taken to promote the participation of victims and witnesses in criminal proceedings and to give testimonies which accurately reflect their experiences and**

***assist courts in establishing the truth? Can a victim of THB be assisted by a social worker, psychologist and/or NGO representative during the investigation and court hearings?***

It is provided and encouraged by the law and the NRM SOPs.

### **Jurisdiction** (Article 31)

**55. *Please outline the measures taken by your country to establish and exercise jurisdiction over the offences set out in the Convention, in particular with regard to offences committed outside the jurisdiction of the state (including in cases where your national is a victim of THB committed abroad).***

According to **Article 8 P.C.** about “Crimes committed abroad, which are always punished according to Greek laws” the Greek criminal laws apply to nationals and non - nationals, irrespective of the laws of the place where they were committed, for the following acts committed abroad: (...), j) Trafficking in Human Beings.

In addition, art. 348D P.C. foresees that the articles **339 P.C.**, **342 P.C.**, **348 P.C.**, **348<sup>A</sup> P.C.**, **348B P.C.**, **348C P.C.** (pornographic presentations of minors), **349 P.C.** and **351<sup>A</sup> P.C.** apply for acts that a Greek citizen committed abroad, no matter if those acts were punishable according to the law of the country where they took place.

### **International co-operation** (Article 32)

**56. *Please provide examples of international co-operation initiatives with other states in preventing and combating THB, as well as an assessment of the impact of such initiatives, including any difficulties you have experienced in this area. Please also indicate any bilateral or multilateral agreements concluded by your country concerning mutual legal assistance and how such assistance is provided in the absence of an agreement.***

The Bilateral Agreement between Greece and Albania on the establishment and operation of a Joint Contact Center for Police and Customs Co-operation in Kakavia consolidated the common efforts of the countries to combat the cross-border organized crime (incl.THB), giving a strong impetus to the strategic partnership of both countries. The Republic of North Macedonia is another strategic partner of cooperation in Western Balkans in combating Trafficking in Persons. Please also see Reply to Recommendation No. 11.

### **Measures related to endangered or missing persons** (Article 33)

**57. *What measures are envisaged in your country to transmit information to another party concerning a victim, witness or collaborator with the judicial authorities in a THB case, who your authorities believe is in immediate danger on the territory of another party? What protection measures are envisaged for such persons, should another party to the Convention inform you about their presence on your territory? Please provide examples from practice.***

The Hellenic Police treats THB as a transnational, multifactorial criminal phenomenon, which requires international cooperation. In this framework, bilateral and multilateral cooperation is also being



developed under the auspices of European Agencies (SELEC, EUROPOL, EUROJUST) with the objective of enhancing cooperation, coordinating actions and contributing to cases under investigation. These meetings improve and broaden cooperation, maximize the exchange of relevant information and optimize efforts to tackle THB. In the light of the above, the Greek Police accepts and responds, through the official channels of Interpol, Europol, SELEC and Liaison Officers, to a sufficient number of requests for information regarding cases of THB under investigation.

Also, as mentioned above, the P.D. 233/2003 stipulates that THB victims' in Greece are entitled to a series of protection measures, including measures for the security of the victims and the places they reside, as well as police assistance in victim's transportation. The protection measures are provided to the victim regardless of whether the offence was committed abroad and if information was brought to the attention of the police from another party.

**58. *Has an early warning system for missing children been introduced in your country and is the harmonised European telephone number for missing children available? What other measures are there for early signalling to other countries about endangered and/or missing children? Has your country concluded any agreements or taken any other measures to reinforce co-operation with other countries in the search for missing people, in particular children, where your authorities have reasonable grounds to believe that missing children may be victims of trafficking or are at risk of becoming victims of trafficking?***

The Greek NGO 'Smile of the child' operates the European Emergency Number for children, in Greece. Along with the hotline, the child abduction/going missing alert system, Amber Alert Hellas, is an emergency response for missing children notifying citizens for incidences of disappearance.

Also, the Emergency Response Mechanism established in the SSPUAM with the support of UNHCR, with the 24/7 hotline, the interdisciplinary team providing guidance, the interpretation services and the mobile units and helpdesks in Athens and Thessaloniki provided by actors on the ground is a safety-net for preventing children from going missing. Whenever a child is going missing the accommodation facilities report this immediately to the police.

#### **Co-operation with civil society** (Article 35)

**59. *What steps are taken by your country to encourage state authorities and public officials to co-operate with NGOs and other civil society organisations, including trade unions, so as to involve them in the elaboration and implementation of anti-trafficking policies, programmes and other initiatives to prevent THB? Please provide information on any memoranda of understanding or other agreements concluded between public bodies and NGOs in this field.***

Synergies with civil society actors are a key factor to the Greek National Policy against THB. With regards to NRM, 42 Civil Society Organisations have accepted until today the National Rapporteur's invitation and numerous state agencies that might detect, identify and/or provide protection services to a victim of trafficking in their everyday practice. The procedure of inviting more actors to participate in the NRM is ongoing. An MoU between the NRM, the ONR and the NGOs has been already drafted and is currently in a consultation process with the NGOs participating in the NRM.

Also, the ONR cooperates closely with civil society stakeholders with the aim to enhance THB prevention, as well as identification & protection of THB victims and presumed victims. A recent example is the signing of an MoU between the ONR and the NGO A21 Greece on the implementation of a series

of targeted actions, such as the training of the personnel in Thessaloniki Airport (Northern Greece) and awareness raising activities.

**Relationship with other international instruments** (Article 40)

60. ***Please indicate any agreements concluded by your country in accordance with Article 40.2 of the Convention.***

Please see Q. 26 on the bilateral agreement between Greece and Albania regarding the establishment and operation of a Joint Contact Center for Police and Customs Co-operation in Kakavia. The agreement explicitly mentions the co-operation on cross-border THB issues. Please also see Reply to Recommendation No. 11.

61. ***Please provide details of cases where victims or possible victims of THB have been granted refugee status or subsidiary/complementary protection.***

As it is displayed in the attached table, 7 presumed THB-victims have been granted refugee status in 2017, 16 in 2019 and 7 in 2020.

**D. Final questions**

62. ***Which bodies and organisations contributed to responding to this questionnaire?***

- Ministry of Foreign Affairs - Office of National Rapporteur on Trafficking in Human Beings (ONR)
- Ministry of Justice
- Ministry of Labour and Social Affairs
  - National Centre for Social Solidarity (EKKA) – National Referral Mechanism (NRM)
  - General Secretariat for Demography, Family Policy and Gender Equality (GSDFPGE)
  - Labour Inspectorate Body
- Ministry of Migration and Asylum
  - Special Secretariat for the Protection of Unaccompanied Minors (SSPUAM)
  - Asylum Service
  - Reception and Identification Service
- Ministry of Citizen Protection
  - Hellenic Police
- Ministry of Education
- Ministry of Infrastructure and Transport - Hellenic Civil Aviation Authority
- International Organization for Migration - IOM
- NGO A21
- NGO Smile of the Child

63. ***Who was responsible for co-ordinating and collecting the replies to this questionnaire?***

Office of National Rapporteur on Trafficking in Human Beings – Ministry of Foreign Affairs

**E. Statistics on THB (per year, starting with 2017)**

*Please See attached table "GREECE DATA 2<sup>ND</sup> ROUND"*

Number of victims identified in the sense of having been recognised by a state institution or mandated NGO as deserving any of the rights or entitlements 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).

Number of presumed victims whom the competent authorities had "reasonable grounds" to believe were victims of THB (with breakdown by sex, age, nationality, form of exploitation, internal or transnational trafficking, and body which identified them). Please clarify whether this number includes victims who were formally identified or is an additional number.

Number of victims granted a recovery and reflection period (if possible, disaggregated by sex, age, nationality, form of exploitation).

Number of victims who received assistance (if possible, disaggregated by sex, age, nationality, form of exploitation, internal or transnational trafficking).

Number of victims who were granted a residence permit, with an indication of the type of the permit and its duration (if possible, disaggregated by sex, age, nationality, form of exploitation).

Number of victims given refugee status and subsidiary/complementary protection.

Number of victims who claimed compensation and who received compensation (if possible, 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.

Number of victims repatriated to your country (if possible, disaggregated by sex, age, country of destination, form of exploitation).

Number of victims repatriated from your country to another country (if possible, disaggregated by sex, age, nationality, form of exploitation).

Number of investigations into THB cases.

Number of prosecutions of THB cases.

Number of convictions for THB resulting in penalties involving deprivation of liberty, with an indication of the duration of the penalty and whether effectively enforced or suspended.

Number of judgments resulting in the confiscation of assets.

Number of judgments resulting in the closure of a business or an establishment which was being used to carry out THB.

Number of convictions for the use of services of a victim of THB.