



G R E T A

Group of Experts on Action
against Trafficking in Human Beings

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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

Third evaluation round

Thematic focus: Access to justice and effective remedies for
victims of trafficking in human beings

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Introduction

In accordance with Article 38, paragraph 1, of the Convention on Action against Trafficking in Human Beings ("the Convention"), GRETA evaluates the implementation of the Convention following a procedure divided into rounds. At the beginning of each round, GRETA selects the specific provisions on which the evaluation procedure is based.

The first round of monitoring of the Convention provided an overview of its implementation by State Parties. The second evaluation round of the Convention examined the impact of legislative, policy and practical measures on the prevention of trafficking in human beings (THB), the protection of the rights of victims of trafficking, and the prosecution of traffickers, paying particular attention to measures taken to address new trends in human trafficking and the vulnerability of children to trafficking.

GRETA has decided that the third evaluation round of the Convention will focus on trafficking victims' access to justice and effective remedies, which is essential for victims' rehabilitation and reinstatement of rights and reflects a victim-centred and human-rights based approach to the fight against human trafficking. A number of provisions of the Convention establishing substantive and procedural obligations are relevant to this topic. Moreover, victims of trafficking, by virtue of their status as victims of human rights violations, are entitled to effective remedies under the European Convention on Human Rights. Access to justice and effective remedies must be guaranteed, in a gender- and age-sensitive manner, to all victims of trafficking subject to the jurisdiction of State Parties, irrespective of their immigration status or presence on the national territory and notwithstanding their capacity or willingness to co-operate in any criminal investigation.

Access to justice and effective remedies is contingent on the fulfilment of a number of preconditions, including prompt and accurate identification of victims of trafficking, the provision of a recovery and reflection period, the availability of material, psychological, medical and legal assistance, regularisation of the victim's stay, the right to seek and enjoy asylum, and the application of the principle of *non-refoulement*. These preconditions, corresponding to different provisions of the Convention, have been examined at length during the first and second evaluation rounds of monitoring of the Convention. Consequently, GRETA has decided to ask each State Party for an update on the implementation of GRETA's previous recommendations on selected topics, through a separate country-specific part of the questionnaire, rather than including once again questions related to the same provisions in the general questionnaire for the third evaluation round.

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

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

Part I - Access to justice and effective remedies

1. Right to information (Articles 12 and 15)

1.1 How, at what stage and by whom are presumed victims and victims of THB informed of their rights, the relevant judicial and administrative proceedings, and the legal possibilities for obtaining compensation and other remedies, in a language that they can understand? Please provide copies of any information materials developed to inform victims of THB, including any materials specifically developed for child victims, in the languages in which they exist.

The information of (presumed) and identified victims of human trafficking is carried out from the first stage of their contact with the authorities, as provided for in Presidential Decree 233/2003 and Law 4478/2017, which transposes in national law the Directive 2012/29/EU.

Victims are informed immediately and in an understandable manner, in a language they understand, with the assistance of an interpreter where necessary, about their rights, the legal process, the possibility of compensation, and the support services available. According to Article 8 of Presidential Decree 233/2003, the competent authorities shall ensure legal support and interpretation for victims who do not speak Greek. In addition, under Article 3 of the same Decree, protection and assistance are provided through cooperation between public bodies and NGOs, while Article 4 ensures the safety of victims during their stay or travel. Frontline services have been trained in a sensitive approach and in providing victims with accurate information, in cooperation with the National Referral Mechanism for the protection of victims of human trafficking (NRM), which has published the "Practical Guide for Frontline Professionals" — a tool that clearly presents victims' rights and referral procedures.

For minor victims, specially tailored information and protection measures are provided (Article 5 of Presidential Decree 233/2003), while the information is provided in the presence of a psychologist or child protection specialist in order to avoid secondary victimization.

Furthermore, as mentioned above, the right to information is foreseen in Law and is enabled in the context of the operation of the Hellenic NRM (National Referral Mechanism on the Protection of Human Trafficking Victims). Responsible for the supervision and coordination of the NRM is the Office of the National Rapporteur on Trafficking in Human Beings (ONR), of the Ministry of Foreign Affairs whereas responsible state actor for its operation is the National Centre for Social Solidarity (EKKA), of the Ministry of Social Cohesion and Family. According to the NRM Standard Operating Procedures, victim identification and basic needs assessment, as a first step, is followed by the provision of information to the presumed victim by the Identification Actor. This may include: 1. the definition of trafficking in human beings; 2. the rights of presumed and formally identified victims of human trafficking (see section "Victims' Rights"); 3. the possibility for cooperating with the prosecuting Authorities; 4. other possible options and their consequences; 5. the possibility of a reflection period (if the victim is a third-country national) provided by the Public Prosecutor; and 6. the operation of the NRM and the obligation of the professional to report the said case to the Mechanism.

In this context, the National Centre for Social Solidarity (hereinafter EKKA), acting as the NRM Operating Authority, has developed multilingual information leaflets on human trafficking indicators, targeting (presumed or potential) victims. The main objective of the said materials is to raise awareness on the phenomenon and provide useful information and guidance for victims on detecting the signs and seeking for assistance. The leaflets have been developed in *12 languages* (i.e. including [Greek](#), [English](#), [French](#), Arabic, Farsi, Urdu, Bengali, Bulgarian, Romanian, Albanian, Ukrainian and Russian), with the main driver being the large-scale influx of refugees in the country during the past years. It should be noted that the majority of cases recorded in the Hellenic NRM refer to victims detected within the refugee population.

Gratis hard copies have been distributed to all NRM partners (state and non-state entities, including IOs and (I)NGOs, which, in their capacity as actors offering protection services, can be approached and consulted by human trafficking victims), while soft copies are available on the [EKKA website](#).

Relevant audiovisual materials on labour exploitation is also available in *5 languages*, including [Greek](#), [English](#) and [French](#), on the [EKKA website](#).

Finally, an information sheet on human trafficking victims' rights (for both adult and child victims) has been made available to all NRM partners, through the [EKKA website](#), in [Greek](#) and [English](#).

All third-country nationals and stateless persons who enter the country without legal formalities undergo reception and identification procedures. The first step in these procedures is the provision of information on their rights and responsibilities, as well as an overview of the stages of registration and identification to follow. This initial stage also includes informing individuals about the process for identifying vulnerabilities and carrying out assessments, with particular attention to potential cases of human trafficking. During medical screening, a psychosocial assessment is also carried out by psychologists and social workers. Medical doctors employed in the Reception and Identification Service (RIS) facilities are able to provide primary healthcare services. When a more in-depth examination or specialized treatment is required, individuals are referred to the appropriate public healthcare units. Likewise, psychosocial support staff may refer individuals, based on their specific needs, to specialized service providers for further support.

The Department of Procedures and Training of the Reception and Identification Service (RIS), in cooperation with agencies, international organizations and non-governmental organizations, is delivering on a systematic basis, several trainings related to trafficking in human beings, to its' staff that is deployed to the reception and accommodation centers at the borders and in mainland, but also at a central level. Similarly, trainings related to: Gender-Based Violence, Child Protection, Prevention from Sexual Exploitation and Abuse (PSEA) and identification of vulnerabilities and further support are provided.

In March 2024, the Reception and Identification Service (RIS) Governor, issued a Standard Operating Procedure on the "identification and response to potential or actual victims of human trafficking within the reception and accommodation facilities". The procedure provides guidelines to the field staff with regards to the steps that need to be followed to better support a victim - potential or actual - of human trafficking. The procedure includes guidelines for minor victims of human trafficking as well. The Standard Operating Procedure was updated and distributed to all the reception and accommodation facilities in September 2024 (Ref. No. 239264/24-9-2024). These SOPs are currently under revision.

Moreover, RIS issued on 24 April 2024, Standard Operating Procedures (Ref. No. 130977/23-4-2024), defining the framework for access of asylum seekers to employment, following the amendments introduced by Law 5078/2023, may access the labour market 60 days after lodging their application for international protection and receiving the required documentation, provided that no first-instance rejection decision has been issued. Asylum seekers and refugees that reside in RIS' facilities are obliged to inform the management of reception facilities of any employment. While employed applicants retain housing and food, financial assistance depends on income level; if employment ends, full reception conditions are restored. Legal employment is further promoted through job fairs and cooperation with UN agencies and NGOs, in line with the legal framework.

The Reception and Identification Service (RIS) of the Ministry of Migration and Asylum in cooperation with United Nations Agencies, namely United Nations High Commissioner for Refugees (UNHCR) and International Organization for Migration (IOM), the European Union Agency for Asylum (EUAA), along with the support of several Non-Governmental Organizations is conducting Focus Groups Discussions (FGDs), information and raising awareness sessions with asylum seekers and refugees, children and adults, who are residing within the regional services of RIS. More specifically, the above-mentioned sessions are focused on several topics such as:

Gender Based Violence (GBV): Types of GBV, indicators of GBV, awareness raising on sexual exploitation and domestic violence, legal framework, available services that can support survivors of GBV, gender stereotypes. To be noted that men are also participating as part of gender sensitization.

Trafficking in Human Beings: Informational sessions are taking place, where children (including unaccompanied children), women and men are participating to be informed on the phenomenon of trafficking in human beings.

In addition, on the occasion of the EU Anti-Trafficking Day 2023-2024, which is being marked on the 18th of October, the Reception and Identification Service developed an informational material on Trafficking in Human Beings that was distributed to all the reception and accommodation facilities aiming to raise awareness among the asylum seekers and refugees. In addition, for the same purpose, a leaflet with all the related helplines in Greece was created and translated into 19 languages. The said material is updated on an annual basis.

Prevention from Sexual Exploitation and Abuse (PSEA): UNHCR has implemented in the regional services operating at the borders of the country informational sessions to women, men and children (including unaccompanied children).

Access to education: Multiple sessions, in cooperation with the Ministry of Education and Religious Affairs and Sports and NGOs, took place with parents and students within the regional services of RIS concerning the importance of attending school, bullying in the school system, the rights of children attending the Greek public-school system, but also the obligatory enrollment and participation of children in the public educational system.

Child Protection: Info sessions took place with regards to interculturality, the rights of the children, neglect, the types of abuse of children, including sexual abuse.

Integration: RIS in cooperation with the aforementioned actors implemented several activities regarding the pre-integration and integration of the residents within the regional services of RIS. More specific, RIS, UN agencies and NGOs provided informational sessions on the employment rights in Greece, Greek Lessons, CV writing, preparation for job interviews, legal advice, improvement of digital skills, link with legal employments and several job fairs that took place within the regional services of RIS.

In accordance with the established guidelines, individuals identified as potential victims of trafficking are referred to the National Referral Mechanism (NRM) for the Protection of Victims of Human Trafficking. They are duly informed of their rights, including the right to cooperate with prosecuting authorities and to be formally recognized as victims of trafficking under applicable legislation.

From the perspective of the Reception and Identification Service (RIS), information to presumed victims of trafficking is provided systematically during the initial reception and identification procedures. Dedicated staff and case managers inform newly arrived persons of their rights, available support services and referral pathways, including the National Referral Mechanism. This is carried out with the support of interpreters, translated leaflets and awareness materials, ensuring that the information is accessible to all, including vulnerable groups and children.

More specifically, presumed victims and victims of trafficking are informed of their rights as soon as indicators of trafficking are detected, during the reception and identification procedures. Any staff member of the reception facilities, medical or psychosocial units, may identify indicators of trafficking. The case is then referred to a Case Manager or the psychosocial team, who conducts an individual assessment. During this stage, victims are informed clearly and, in a language, they understand about their rights, judicial and administrative proceedings, possibilities for obtaining support, compensation, and other remedies. The information includes the recognition of trafficking as a form of vulnerability, the right to specialised care, psychosocial support, safe accommodation, and access to justice.

Information materials are adapted for adults and children and are available in several languages. For children, the approach is child-sensitive: communication is adjusted to their age and maturity, interviews are conducted in adapted spaces, and their best interests are the primary consideration

1.2 How is the obligation to provide translation and interpretation services, when appropriate, met at different stages of the legal and administrative proceedings by different agencies?

In proceedings before the judicial authorities (interrogation/hearing), there is - under penalty of invalidity - the obligation of interpretation for witnesses - victims.

The provision of an interpreter to victims of human trafficking is a right enshrined in the Code of Criminal Procedure. At all stages of the proceedings, the competent authorities must ensure that victims understand the language in which the criminal proceedings are conducted. Where this is not possible, an interpreter is appointed at no cost to the victim. This provision covers both communication in court and the translation of crucial documents (indictments, decisions on deprivation of liberty, etc.). Interpretation is part of the special protection provided by the CPC (Article 228) to victims of trafficking to ensure their effective participation in the proceedings, with respect for their dignity and rights.

Reception and Identification Service (RIS) provides interpretation services to the applicants of international protection to all stages of the reception phase.

Within the Reception and Identification Service, interpretation services are ensured through cooperation with the European Union Agency for Asylum (EUAA) and specialised non-governmental organisations. Interpreters provided by these partners cover the main languages spoken by newly arrived third-country nationals and are present during the different stages of the reception procedure, including registration, vulnerability assessment, medical and psychosocial screening, and individual or group information sessions.

For less common languages, RIS makes use of remote interpretation solutions facilitated by partner organisations. This system ensures that presumed victims of trafficking and other vulnerable persons are able to receive and understand essential information and to communicate effectively with the competent authorities from the first point of contact.

Translation and interpretation are provided throughout the identification and administrative procedures. During reception and identification, interpreters are available to ensure understanding of the process and rights. In subsequent proceedings, interpretation is ensured by the competent authority handling the case, while NGOs cooperating in the National Referral Mechanism may also provide support. For children and other vulnerable persons, particular attention is paid to adapting the communication so that the information is fully understood.

2. Legal assistance and free legal aid (Article 15)

2.1 How, by whom and from what moment is legal assistance provided to victims of trafficking? How is legal assistance provided to children?

Legal assistance to victims of human trafficking begins from the moment the victim first contacts the competent authorities, mainly the Hellenic Police. Victims are immediately informed, in a language they understand and with the assistance of an interpreter, if necessary, of their right to free legal aid, in accordance with the Code of Criminal Procedure and the relevant institutional framework for the protection of victims.

This information is accompanied by a referral to the National Referral Mechanism (EKKA/EMA), which ensures that the victim is connected with the appropriate support agency. Usually, the NGO A21 or, in cases involving minors, the General Secretariat for Vulnerable Persons and Institutional Protection, provides comprehensive care services, including the appointment of a legal aid lawyer.

Legal assistance covers all stages of the process—from preliminary investigation and testimony to trial and appeals—and is provided both when the victim is acting as a civil claimant and when they are being examined as a witness.

The process takes place in appropriate, child-friendly spaces, in the presence of a psychologist or child protection specialist, and statements may be recorded to avoid secondary victimization.

Actors participating in the NRM offer free legal consultation on human trafficking for victims but representation is usually covering solely their asylum claims or legal status regularisation in general. Few organisations providing legal services offer representation in penal or civil proceedings in the context of a human trafficking case. Any development on the said cases are monitored by the NRM team in EKKA.

With regard to third-country nationals who stay in the Controlled Access Facilities for Temporary Accommodation of Asylum Seekers (CAFTAAS) RIS' personnel do not provide directly legal assistance to victims of trafficking.

However, the victims could be referred to external actors for legal assistance. According to the above-mentioned SOP's (Q.1.1) the provision of information to the potential victim is followed by a basic needs assessment. Then, the Case Manager, who is in charge of the potential victim's case, must determine whether the adult potential victim wishes to be referred further to receive support or not, the type of support for which he/she wishes and consents to be referred and when he/she will decide to seek help.

For minor residents and especially those of very young age (under 12 years), the Case Manager may proceed with further support and referral even without the minor's agreement, if this is deemed necessary to protect the minor's best interests. In each case of a minor, information must be provided to the person exercising custody/care (e.g. parent, or guardian if the minor is unaccompanied) and his/her consent must be obtained.

The organization Solidarity Now is implementing the project «PROCAP – Protection of Victims of Human Trafficking, Capacity Building, and Support of Key Stakeholders» in partnership with NGO KMOP – Social Action and Innovation Centre and the National Centre for Social Solidarity (EKKA). Through mobile units operating in Attica and Central Macedonia (including the wider surrounding areas). Since early 2024 the PROCAP programme provides psychosocial support, legal assistance and representation, interpretation and translation services, accompaniment, as well as integration and anti-trafficking interventions for victims or potential victims of human trafficking.

In addition, the project “Specific Action on the Provision of Services to Victims of Trafficking in Human Beings Who Are Third-Country Nationals” is being implemented by the International Organization for Migration (IOM) – Mission in Greece, in partnership with the General Secretariat for Vulnerable Persons and Institutional Protection (GSVIP) of the Ministry of Migration and Asylum (MoMA), and with the overall support of EKKA. The initiative is carried out within the framework of the National Referral Mechanism for the Protection of Victims of Human Trafficking (NRM) and forms part of the Greece Program – Asylum, Migration, and Integration Fund (AMIF) 2021–2027, co-financed by AMIF.

The project focuses on providing support and specialized services to victims of trafficking who are third-country nationals (TCNs), including those residing in RIS facilities, with particular emphasis on promoting their integration. Furthermore, IOM delivers training for front-line staff working in reception facilities, shelters, and other specialized structures, equipping them with the skills and knowledge necessary to address the protection needs of victims of trafficking effectively.

Moreover, the Ministry of Migration and Asylum, in partnership with Odyssea Civil Non-Profit Company, implements the project “Bridging the Skills”. This initiative offers tailored vocational training combined with employability services, supporting young people in their transition to the labour market and empowering them to reach their full potential. The project focuses on migrants, refugees, and asylum seekers, aiming to foster their early integration into society by providing access to education, skills development, and employment opportunities.

Greece has a legal aid system (“νομική βοήθεια”) for persons unable to bear legal costs. Individuals who are financially vulnerable can submit an application for legal aid in the competent court (Πρωτοδικείο or other courts depending on the case). Upon acceptance, they receive legal counsel and representation furnished by lawyers appointed or participating in the legal aid scheme.

Legal assistance is offered from the moment a person is identified or presumed as a victim of trafficking. Case managers and psychosocial staff ensure immediate referral to legal support services. Legal

assistance is provided irrespective of immigration status or type of exploitation. For children, guardians ensure that legal advice and representation are adapted to their needs. The system is supported by cooperating NGOs.

2.2 Do all presumed victims of THB have access to legal assistance, irrespective of immigration status or type of exploitation?

THB is prosecuted ex officio under Greek law, regardless of immigration status or type of exploitation. Therefore, the victim's statement is sufficient to initiate criminal proceedings without any prior verification of the victim's immigration status, type of exploitation, or payment of any fee or charge. However, if the person reporting the criminal act wishes to appear as a party throughout the proceedings, i.e. as a supporter of the charge, he or she must pay the appropriate fee. If he/she needs free legal aid, he/she should receive it in accordance with Law 3226/2004 (Article 5, paragraphs 3 and 4) and Laws 4198/2013 and 4487/2017, which respectively incorporated Directives 2011/36/EU of the European Parliament and of the Council on preventing and combating trafficking in human beings and protecting its victims and 2012/29/EU of the European Parliament and of the Council establishing minimum guarantees for the rights, support and protection of victims of crime.

2.3 What are the conditions for access to free legal aid for victims of THB, including children? For which types of proceedings is free legal aid available? Is free legal aid available to help victims claim compensation and execute compensation orders? Please provide the text of the relevant provisions. Please refer to Q.2.2 above.

2.4 Are there lawyers specialised to provide legal aid and represent victims of THB in court? What regulations, if any, are applicable to the provision of such legal aid/representation?

Professionals working in agencies or organisations who are NRM partners, including those providing legal advice and representation, have received extensive training and have gained expertise on handling human trafficking cases. For more information, please refer to Q.3.6 below.

2.5 How is the provision of legal assistance and free legal aid for victims of THB funded? Do victims have to pay a fee to obtain legal assistance or start a procedure, or are there other financial barriers in place? If yes, please specify the amount(s). Please refer to Q. 2.2 above.

3. Compensation from the perpetrators (Article 15)

3.1 What measures are in place to enable courts to award compensation to victims of THB, including children, from the perpetrators as part of criminal proceedings? What is the role of prosecutors in this respect?

According to article 164, paragraph 3 of Law 4635/2019, article 63A was added after Article 63 of Law 4478/2017, in accordance with the Criminal Procedure Code, assets seized during criminal proceedings and deemed to be returned to victims, shall be returned to them immediately. According to the new provisions of Article 373, paragraphs 1, 3 and 5 of the Criminal Procedure Code, the return to the victim of the recovered assets that result directly or indirectly from the criminal act and are considered to be material damage to the victim, precedes the seizure of such assets. The prosecution authorities must supervise the execution of the relevant provisions of the decisions issued.

This does not prevent the victim from asking the Civil Court for a higher amount of compensation (if his/her positive and consequential damage was not covered by the criminal court as mentioned above) and/or monetary compensation for moral damages.

3.2 How is the amount of compensation calculated and are there specific criteria or models for calculating it? What types of injury/damage and costs are covered? Are there any circumstances/conditions that would lead to a reduction of the amount of compensation? Please refer to Q. 3.1 above.

3.3 How are compensation orders/verdicts enforced? What measures are in place to guarantee and ensure effective payment of compensation? Please refer to Q. 3.1 above.

3.4 When foreign victims of THB are removed from or choose to leave the country where the exploitation took place, what measures are in place to enable them to obtain compensation and other remedies? Please refer to Q. 3.1 above.

3.5 What procedures are in place to ensure effective access to compensation for victims of THB for the purpose of labour exploitation? Can such victims bring civil claims for compensation and/or recovery of unpaid wages and social contributions on the basis of tort, labour, employment or other laws? Please specify the relevant measures. Can victims of THB working in irregular employment or without a contract claim unpaid wages and other compensation and if yes, how is the amount of unpaid wages and other compensation established?

According to Law 4052/2012, Art. 81, an employer who employs an illegally staying third-country citizen must pay him all due wages even when he has returned to his country.

Employees retain the same right when they appeal to the Labour Inspectorate. The complaint of undeclared or illegally employed employees is submitted to the local Labour Relations Inspectorate Departments, whereas they can also request the initiation of a labour dispute for any case of violation of labour legislation. This service and the referral of the labour dispute file to the Prosecutor for further investigation, is provided free of charge to the employee.

The labour dispute procedure for undeclared and illegal workers is provided by the same law in article 83, stating that:

*"1. Illegally employed workers, like any legally employed worker, may submit themselves or on their behalf to the local labour centres,..... any complaint provided for by national legislation against their employer.
2. The provision of assistance to third-country nationals in submitting a complaint shall not be considered in any case as assisting the illegally employed worker in illegal entry, transit and residence."*

3.6 What training is provided to build the capacity of relevant professionals, such as lawyers, law enforcement officers, prosecutors and judges, to enable victims of THB to obtain compensation and other remedies?

State agencies in cooperation with international organizations and civil society have carried out a considerable number of specialized trainings for law enforcement officers, prosecutors and judges.

An indicative list of recent trainings-workshops-educational meetings is given below:

The Hellenic Diplomatic Academy of the Ministry of Foreign Affairs pursuant to the suggestion of the Office of National Rapporteur (ONR) has included in the curriculum of the education of new promotion of diplomats special training (lectures and simulations) about the issue of THB. Specifically, among other, the specialized programme focus on training young diplomats how to identify potential victims of trafficking when exercising Consular duties - visas applications etc.

The ONR, in cooperation with UNODC, OSCE(OSR/CTHB) and the Diplomatic Academy of the MFA, organized a training workshop for young diplomats on anti-trafficking issues in 2024 and 2025 respectively.

Moreover, the ONR with the OSCE (OSR/CTHB), under the aegis of Bank of Greece, co-organised a roundtable (14/10/2024) aiming to raise awareness about the role of financial services in combatting THB. This roundtable was addressed to relevant public and private sector organizations, including government agencies, financial intelligence units (FIUs), financial institutions, criminal justice representatives and intelligence in identifying and responding to THB-related financial flows, strengthen public-private partnerships between various disciplines, and build momentum to combat TIP with special focus on emerging threats such as increasing use of cryptos and child sexual exploitation online.

For enhancing the protection of victims of human trafficking the ONR and the National Referral Mechanism (NRM/EKKA), in cooperation with OSCE (OSR/CTHB), co-organized a workshop on "Unconditional access to services for victims of trafficking in human beings" (Social Path Workshop) (Athens, 14-15/2/2024) with representatives of state/governmental agencies, NGOs and IO's. The workshop served as a participatory expert platform to enhance the participants' understanding of the rationale behind the so-called "social path" alternative to victim identification and assistance that is detached from victims' co-operation with the criminal justice system, as well as the benefits it brings to victims themselves. A considerable part of the discussion centered around the steps and measures required for a more effective implementation.

Implemented by UNODC in collaboration with the ONR/MFA, the Ministry of Migration and Asylum / General Secretariat for Vulnerable Persons and Institutional Protection and the Ministry of Europe and Foreign Affairs of France, a Regional Expert Group Meeting (REGM) on the Nexus between Human Trafficking and Migration Flows in South-Eastern Europe, has taken place in Thessaloniki (23-24/10/2024). REGM brought together practitioners from Albania, Bosnia and Herzegovina, Bulgaria, Croatia, Greece, Kosovo (UNSCR 1244), Moldova, Montenegro, North Macedonia, Romania, Serbia, Slovenia and Ukraine to discuss the patterns and profiles of organised crime along the whole migration route from countries of origin through transit countries to the EU and enhance the capacities of the relevant stakeholders.

The Office of National Rapporteur on trafficking in human beings (ONR/MFA) in cooperation with experts in the phenomenon of Human Trafficking, has included, beginning in 2022 to date, in the programme of the Training Institute (INEP) of the National Centre for Public Administration and Local Government (EKDDA)/Ministry of Interior a recurrent training seminar on: "Preventing and combating human trafficking: identification and protection of victims of human trafficking", targeting national-authority staff including the Hellenic Labour Inspectorate. The objective of these training sessions is to raise awareness on the phenomenon and inform field professionals on: a) signs for identifying human trafficking victims, b) effective ways to communicate and work with human trafficking victims through experiential learning, c) the existing legal framework in the EU and national context, and d) the Hellenic National Referral Mechanism for the protection of victims (NRM/EKKA) tools and SOPs. These trainings aim further to facilitate early identification of victims, effective case management and proper referrals, where relevant.

NRM capacity building activities

EKKA has been facilitating capacity building activities, in the form of training sessions, targeting national-authority and (I)NGO/IO staff, both in urban centres and in various regions across the country, with the objective to raise awareness on the phenomenon of human trafficking and facilitate early victim identification, effective case management, including victim participation in criminal proceedings and access to remedy, and proper referrals, where relevant. In that context, lawyers, mostly working in civil society organisations, and law enforcement officers have familiarised themselves with the existing legal framework in the EU and national level including relevant provisions on the right to seek redress and how it can be applied.

Moreover, on a monthly basis, EKKA has been coordinating a working group meeting with the participation of legal professionals (incl. (I)NGO staff and public officials) working with human trafficking victims, with the objective to discuss good practices, detect gaps in the legislation and/or legal services available, and

initiate advocacy interventions with regard to victims' rights, including participation in criminal proceedings and access to remedy.

The Hellenic Police, through its competent services, provides systematic and multi-level training to its personnel, with the aim of strengthening their ability to ensure that victims of human trafficking have access to assistance and protection services.

The training includes courses on human rights and the protection of vulnerable groups at the Police Academy, as well as retraining seminars focusing on the investigation of human trafficking cases and cross-border cooperation.

At the same time, Hellenic Police officers participate in specialized international training courses (CEPOL, FRONTEX, etc.) on the identification, protection, and support of victims.

The topic of human trafficking has been included in the curriculum of the Police Academy, and repeated and updated training courses are held with an emphasis on a "victim-centered" and "trauma-informed" approach in order to prevent secondary victimization.

At the same time, cooperation activities are being developed with prosecutors and judicial officials to enhance understanding of the legal framework and improve the handling of human trafficking cases with respect for the rights of victims.

In cooperation with organizations such as A21, EKKA, and the Office of the National Rapporteur (ONR), the practical ability of police officers to identify, refer, and support victims in claiming their rights is being strengthened.

Specifically:

In 2024, the Hellenic Police implemented an extensive retraining and specialized training program for its personnel on human trafficking issues, participating in numerous national and international training activities. Police officers were trained in programs run by the European Border and Coast Guard Agency (Frontex), CEPOL, the US Embassy, as well as seminars organized by the UN High Commissioner for Refugees, the NGO A21, and the Terre des Hommes Foundation. The topics covered all aspects of human trafficking—sexual and labour exploitation, victim identification, international cooperation, prevention, and protection.

In 2025, the Hellenic Police continued to provide intensive specialized training to its personnel on human trafficking issues, participating in several international and European training activities. Police officers were trained in programs run by Frontex, CEPOL, and Europol, as well as in seminars and workshops organized by international and national bodies such as the International Training Centre for Combating Organized Crime, the RAILPOL Network, and British authorities.

Particular emphasis was placed on labour and sexual exploitation, transnational cooperation and digital investigations, as well as the implementation of the European ERADICATING II program, in which a total of over 80 police officers participated in training and simulation exercises. These actions contributed significantly to strengthening the skills of identifying, protecting, and supporting victims, as well as to more effectively combating cross-border forms of human trafficking.

Through the CEPOL National Department, the Hellenic Police further enhanced the level of specialized training of its officers on human trafficking issues, by participating in a series of in-person and online seminars organized by the European Union Agency for Law Enforcement Training (CEPOL) in 2024 and 2025.

Specifically, Hellenic Police officers participated in training courses on labour exploitation and the detection of online trafficking in human beings, as well as in specialized webinars on combating sexual exploitation and trafficking in children, with an emphasis on judicial interview protocols.

At the same time, they were trained on the latest European developments regarding the revised Directive on trafficking in human beings and the 5th EU Progress Report, strengthening the institutional and operational readiness of the Hellenic Police for the implementation of EU policies against trafficking in human beings.

The General Secretariat for Vulnerable Persons and Institutional Protection of the Greek Ministry of Migration and Asylum participates as a partner in the project "Safe Borders: Strengthening Judicial Expertise and Frontline Support to Combat Child Trafficking." The project aims to combat child

trafficking by enhancing the capacities of judicial authorities and frontline professionals through a comprehensive and coordinated approach.

It focuses on strengthening the expertise of judicial authorities by facilitating knowledge exchange, identifying best practices and implementing capacity-building activities. One of its key components is the creation of a network of specialized prosecutors in human trafficking to improve coordination and strengthen expertise in prosecuting cases involving child victims.

Among the project's main activities is the provision of specialized training for prosecutors, judges and frontline professionals to improve the identification and support of victims. In addition, tailored training materials are being developed to address the specific needs of each professional group, with a particular focus on child exploitation.

Regarding the training procedure of Hellenic Coast Guard officers on human trafficking issues from 2022 onwards, the curriculum of both the HCG Cadet Ensigns Academy and the Cadet Harbour Guards Academy includes courses entitled "Human Rights – Anti-Discrimination" and "Management and Protection of Sea Borders". These courses address issues related to the prevention and combatting of human trafficking, as well as the prevention and prohibition of torture and other forms of cruel, inhuman, or degrading treatment or punishment.

In addition, the teaching of the above courses aim to provide the necessary knowledge to learners in order to understand the scope of fundamental rights and the consequences of their violations (such as human trafficking) and to comply with National, European and International law, in the exercise of border guard duties.

Over the last three years (from 2022 till September 2025), 173 Cadet Ensigns and 307 Cadet Harbour Guards have been trained to both HCG Academies (Cadet Ensigns Academy as well as the Harbour Guards Academy).

Moreover, continuous Education Unit of the Training Directorate designs and implements, in regular basis and in coordination with other appropriate services, trainings of the HCG personnel, to increase the operational capability of HCG and improve its degree of response to modern requirements-challenges. In this context HCG:

- i. has trainers on "Combating Trafficking of Human Beings" and "Protection of Fundamental Human Rights" and conducts in-house trainings with the participation of HCG officers serving in Port Authorities, which are responsible to manage migration flows and combating cross-border crime.
- ii. collaborates with organizations, such as the UN High Commissioner for Refugees, Danish Red Cross, The Smile of the Child (non-profit organization with prevention activities for children in Greece who faces phenomena of violence and/or child disappearances) to implement training programs. Over the last three years (from 2022 till September 2025), 135 officers have been trained in trainings related in "Human trafficking" ».

Additionally, Hellenic Coast Guard sent instructions to all Coast Guard Authorities of the Country to provide information regarding victims of human trafficking. In this context, the NRM website <https://ekka.org.gr/index.php/el/ethnikos-mixanismos-anaforas> was shared to them with all useful related material, as well as the full set of legislative provisions governing human trafficking. At the same time, the following relevant manuals were sent: i) the Handbook for the Protection of Victims of Human Trafficking and ii) the Practical Guide for Frontline Professionals on the identification and protection of victims of human trafficking, both developed by the National Referral Mechanism for the Protection of Human Trafficking Victims, along with relevant informational brochures.

Finally, it is noted that HCG Basic Training Department communicated to the Coast Guard Authorities of the Country, the existence of three electronic publications developed by the Office of the Special Representative and Coordinator of the OSCE for Combating Trafficking in Human Beings. These publications provide support to frontline agencies engaged in the reception and assistance of Ukrainian and other refugees who are at risk of falling victim to human trafficking.

4. State compensation (Article 15)

4.1 Do the eligibility criteria for State compensation schemes for victims of crimes exclude some victims of THB (e.g. due to irregular residence status, nationality, nature of the offence)? Does access to State compensation depend on the outcome of the criminal case and on failure to obtain compensation from the offenders?

Article 54, paragraph 2 of Law 4689/2020 stipulates that victims of crimes of violence committed intentionally or of crimes under articles 323A, 336 against a minor, 339, paragraphs 1 and 3, 342, paragraph 1, 348A, 348B, 348C, 349 and 351A of the Criminal Code, which have been committed in Greece, who have their residence or habitual residence in Greece or in the territory of another Member State of the European Union or even a third state in the cases of article 323A of the Criminal Code (THB), are entitled, upon their request, to reasonable and appropriate compensation from the Greek State.

Therefore, compensation from the Greek State is given when there is an irrevocable criminal court decision and all victims of THB are included.

4.2 How is the amount of State compensation calculated so as to address the gravity of the harm endured by the victim?

The right to seek compensation is stipulated in Article 3 of Law 3811/2009, which transposed Directive 2004/80/EC into the Greek legislation 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.

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.4.1), (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) and in the event that the claim for compensation is accepted, the fee is returned to the applicant.¹

4.3 Is it possible for foreign victims of trafficking to submit claims for State compensation in your country after being returned or repatriated to their countries of origin? Please provide examples of any such cases and indicate the measures stipulating such a possibility. Please refer to Q.4.1& 4.2 above.

¹ https://e-justice.europa.eu/topics/your-rights/victims-crime/compensation/if-my-claim-be-considered-country/el_en

4.4 Are victims seeking State compensation liable for lawyers' costs and fees? Are State compensation awards subject to taxation? Does the receipt of compensation have consequences for access to social security or other benefits?

Please refer to Q.4.1 & 4.2 above.

5. Sanctions and measures (Article 23)

5.1 Please describe the legislative and other measures adopted by your country which allow to: i) confiscate or otherwise deprive perpetrators of the proceeds of criminal offences, or property of an equivalent value to those proceeds; and ii) identify, trace, freeze or seize rapidly property which is liable to confiscation, in order to facilitate the enforcement of a later confiscation. Do these measures allow the identification, tracing and seizure of property into which the proceeds of illicit activities have been converted?

Please refer to Q. 3.1 above and Q.9.2 below.

5.2 In what way do victims of THB benefit from seized and confiscated assets of perpetrators of THB? Do the confiscated assets go directly to victims, to a compensation fund or scheme for victims of trafficking or to other programmes for the assistance or support of victims of THB? Please provide information on seizures and confiscations of assets in THB cases and how they were used.

Please refer to Q. 3.1 above.

5.3 Is it possible to use plea bargaining or some other form of settlement in cases of THB? If yes, please provide the relevant provisions. What protections are in place for victims of THB to ensure that their right of access to justice and effective remedies is not compromised by the plea bargaining or settlement in the legal process?

According to article 303 of the Criminal Procedure Code, plea bargaining is permitted for the crimes of THB, the success of which does not affect the securing of the rights of the victims. The satisfaction of the victims by the perpetrators entails, according to article 304 of the Criminal Procedure Code, the release of the perpetrators' assets.

5.4 What is the average duration of court proceedings in THB cases? In which circumstances are such cases given priority? Do you have a system to fast-track human trafficking-related prosecutions in order to improve the trial process and reduce the burden on victims and witnesses, including children? What safeguards are in place to ensure that judges deal with cases of THB without undue delay?

In 2020, Prosecutor's Office in the Supreme Court issued the No. 9/2020 document, according to which prosecutors must immediately conduct a preliminary examination in THB cases and accelerate their processing, after detailed collection of all evidence, with the aim of criminally prosecuting the perpetrators.

5.5 How do you ensure that sanctions for THB offences are effective, proportionate and dissuasive?

The provisions in articles 323 A et seq. of the Criminal Code, provide for severe penalties for these offenses. Also, according to the general provision of article 79 of the Criminal Code, the manner in which the judicial assessment of the penalty takes place is defined in detail. Finally, stricter criteria are provided for the conditional release of the convicted person, according to paragraph 6 of article 105B of the Criminal Code.

6. Ex parte and ex officio applications (Article 27)

6.1 What is the procedural position of a victim of THB in criminal proceedings? What steps are taken to assist victims of THB, including children, to enable their rights, interests and views to be presented and considered during the criminal proceedings against offenders?

Who is entitled to assist victims of THB in court? Can victims of THB be represented by NGOs in criminal proceedings?

According to the Hellenic Police the procedural position of victims of human trafficking (VoHT) in criminal proceedings (trials) is determined by the Code of Criminal Procedure and specific legislation (Law 3064/2002, Presidential Decree 233/2003, Law 5038/2023, etc.).

1. Procedural position of the victim
 - Victims of human trafficking have a dual role: on the one hand, as witnesses for the prosecution and, on the other hand, as civil claimants for compensation.
 - The Code of Criminal Procedure provides for special arrangements for witnesses who are victims of trafficking (Articles 218 and 228 of the Code of Criminal Procedure) in order to ensure their protection during criminal proceedings.
 - They are not deported during the proceedings, even if they are foreigners without legal documents (Article 12 of Law 3064/2002).
2. Support measures for the victim to present their rights and opinions
 - Legal assistance and the right to be represented by a lawyer are provided so that the victim can exercise all their rights.
 - Witness protection measures (Article 218 of the Code of Criminal Procedure) are applied, such as anonymity, examination via teleconference, and protected residence.
 - For child victims, a special examination procedure is provided for, with the presence of a child psychologist/social worker and avoidance of secondary victimization.
 - The authorities (prosecutor, court, NRM/EKKA) are obliged to ensure that the views and interests of victims are heard and considered.
3. Who can assist the victim in court
 - The victim's lawyer is the main representative.
 - Specialized social workers, psychologists, or other professionals can provide support during the hearing (especially for minors).
 - The National Referral Mechanism (NRM) and the competent social protection agencies assist in the preparation and presence of victims.
4. Representation by NGOs
 - NGOs play an important role in supporting, informing, and providing psychosocial support to victims.
 - However, they cannot represent victims as parties to the proceedings (e.g., bring a civil action or speak on their behalf). This can only be done by a lawyer appointed by the victim themselves or by the state through legal aid.
 - NGOs can accompany and provide practical and emotional support but cannot replace legal representation.

However, NGOs serve as the primary specialised providers of free legal counselling and representation for THB victims. This high reliance on civil society is reflected in the Hellenic NRM data: among all human trafficking cases with pending criminal proceedings and legal representation recorded between 2022 and the first half of 2025, the vast majority were cases where legal aid was provided by NGOs.

6.2 If the authorities fail to discharge their obligation to effectively investigate and prosecute suspected cases of trafficking, what possibilities for redress exist for victims of THB and their families? To what extent have victims of trafficking, including children, access to complaint mechanisms, such as Ombudsman institutions and other national human rights institutions?

The Greek Ombudsman has as general mandate to protect human rights, to safeguard rule of law and to combat maladministration. The Greek Ombudsman has also a special mandate for the protection of children's rights. Furthermore, it has to be noted that the Greek Ombudsman has a special mandate for promoting equal treatment and combat discrimination. According to the

current legal framework every person has the right to file /address a complaint to the Ombudsman and the services of the Greek Ombudsman are free of charge. Although for victims of THB is generally difficult to have access to complaint mechanisms due to various difficulties, that they face e.g. language barriers, fear, lack of information, etc. According to Greek Ombudsman's experience, it has to be noted that a lot of victims have been supported very often by NGO's and lawyers active in the field. Moreover, it has also to be noted that the Greek Ombudsman has also the power to investigate cases by its own initiative and had investigated such cases in the past:

(e.g. the case of workers of Nea Manolada , see a.a. Special Report on Equal Treatment, 2018, p.68 - 69 file:///C:/Users/boyts_mar/Downloads/The%20Greek%20Ombudsman%E2%80%99s%20Special%20Report%20on%20equal%20treatment%20and%20non-discrimination%20for%20the%20years%202018-2019.pdf)

ECHR's Judgement on CASE OF CHOWDURY AND OTHERS v. GREECE (Application no. [21884/15](https://hudoc.echr.coe.int/eng#%7B%22itemid%22:%5B%22001-172701%22%7D)) (par. 48-53) : <https://hudoc.echr.coe.int/eng#%7B%22itemid%22:%5B%22001-172701%22%7D>

More information is available at Greek Ombudsman's website at: <https://www.synigoros.gr/en/category/synhgoros-toy-polith>

6.3 What reporting and complaint mechanisms are in place for victims of trafficking who are in an irregular migration situation and/or in detention?

As it has already been mentioned access to the Greek Ombudsman's services has every person, irrespectively of nationality and/or legal status in Greece. That means that irregular migrants that are victims of THB have also right to address a complaint. Moreover, it has to be noted that the Greek Ombudsman has also a special mandate as National Preventive Mechanism (NPM) for persons that are in detention and deprived of their liberty.

More information for the role of the Greek Ombudsman as NPM are available at: <https://www.synigoros.gr/en/category/eidikes-ek8eseis/post/eidikh-ek8esh-or-opcat-2024> (...)»

6.4 Can victims of THB bring claims against the State or its officials for: i) direct involvement in THB; ii) failure to prevent THB or protect them from THB? Have there been cases where State agents or persons acting on behalf, or at the direction, of the State were found responsible for engagement in THB and/or failure to prevent it or protect victims from THB by third parties? Please provide information on any prosecutions against diplomatic and consular staff for alleged involvement in THB.

In accordance with the legislation in force (Penal Code, Code of Criminal Procedure, Immigration Code, Presidential Decree 233/2003, etc.), specific measures are taken to ensure that victims of human trafficking have equal access to justice and effective legal remedies, regardless of their immigration status, the form of exploitation, or who is the perpetrator. According to para. 3 of the Article 323A of the Penal Code the action of trafficking in human beings is punished with at least ten (10) years imprisonment and a fine when:b) it is performed by an employee who during the exercise of his service or by taking advantage of their capacity commits or participates in any way in the action. This means that his/her capacity, as employee, constitutes an aggravating circumstance.

From 2022 to date, cases of irregular/illegal issuance of entry visas by Greek consular authorities to foreigners have been identified and investigated by the Service and the judiciary. However, we have not been notified of any prosecutions against diplomatic and consular staff for alleged involvement in THB.

6.5 What steps have been taken to strengthen and maintain the capacity of prosecutors to effectively prosecute trafficking cases?

In addition to their particularly high level of training, Greek Prosecutors are constantly informed and trained, aiming at knowledge of the evolution of criminal offenses and their effective treatment.

7. Non-punishment provision (Article 26)

7.1 Please indicate what measures are taken to ensure that victims of THB, including children, are not punished for their involvement in unlawful activities (criminal, civil, administrative offences), to the extent they were compelled to do so, providing any concrete examples of their implementation.

In Greece, the principle of non-punishment of victims of human trafficking (THB) is applied to ensure that there are no criminal, administrative, or civil penalties for illegal acts in which they were forced to participate due to exploitation.

The Criminal Code and specific laws (Law 3064/2002, Law 4198/2013, Law 5038/2023) provide that victims of human trafficking shall not be punished for acts that are a direct result of their coercion or exploitation. For minor victims, non-punishment is applied even more strictly: children who have been forced to participate in criminal or delinquent activities, such as begging or petty crime, cannot be prosecuted.

More specifically, a new provision was introduced by the Criminal Procedure Code in Article 323 A of the Criminal Procedure Code. According to paragraph 8, the prosecutor of the misdemeanor courts (with the approval of the prosecutor of appeals) may temporarily suspend criminal prosecution for a violation of the Immigration Law and the Law on Prostitutes, as well as for violations due to participation in criminal activities, of a person who stated that the criminal offenses were committed against him, specifying that this participation is a direct consequence of the person being a victim of THB. If the claim proves to be well-founded, the abstention becomes final.

The CPC extends the scope of protection for victims of THB by adopting a provision for definitive abstention from prosecution of perpetrators of specific offenses (illegal entry/exit from the country, possession and use of travel documents, identity cards, residence permits and other forged or genuine documents issued for another person, illegal employment, prostitution) provided to the victim of THB and the perpetrators of THB have been irrevocably convicted (Article 59, paragraphs 4 and 5 of the CPC).

7.2 Can persons who have breached national laws in the course, or as a consequence, of being trafficked have access to remedies for victims of trafficking, including State compensation? Please refer to Q.7.1 above.

8. Protection of victims and witnesses (Articles 28 and 30)

8.1 How are victims of THB protected in practice against potential retaliation or intimidation before, during and after legal proceedings? How is the assessment of the needs for protection performed and who recommends the application of the protection measures? Who is responsible of the implementation of the protection measures?

The protection of victims of human trafficking is ensured in practice through a coordinated cooperation mechanism between the Hellenic Police, the National Referral Mechanism (NRM), and victim support agencies, such as the National Center for Social Solidarity (EKKA) and the NGO A21. Once a potential victim has been identified, the police immediately inform the NRM and send a relevant referral form so that an assessment of protection needs can begin.

The needs assessment is carried out in cooperation with the host agency or directly by the NRM² and includes an investigation of any risks of intimidation, retaliation, or revictimization. Depending on the risk

² A THB victim can be identified at any stage. Following their identification, the professional providing protection services must carry out a needs assessment and create an individualised plan. First-level protection, as per the NRM SOPs, includes core protective measures, particularly safe accommodation in a site distinct from the area of exploitation or the place of residence of the perpetrators. When accompanying the presumed victim to the shelter, they must be escorted by the Police, a professional from an NRM Actor, or a trusted person. Additionally, the level of risk of the site must be thoroughly assessed.

assessment, the victim may be housed in safe accommodation, receive psychosocial support, or be provided with police escort and increased surveillance during the criminal proceedings.

Protective measures are implemented before, during, and after the judicial process by the Hellenic Police in cooperation with the NRM and specialized care agencies. The continuous exchange of information and monitoring of the victim's situation allows for the timely activation of appropriate measures, ensuring that each victim receives individualized protection and support, depending on the level of risk and their specific needs.

As analyzed in Q.2.1, regarding third-country nationals and stateless persons who enter the country without legal formalities according to the above-mentioned SOP's (see Q.1.1) the provision of information to the potential victim is followed by a basic needs assessment. The Case Manager, in cooperation with the potential victim, assesses the physical and mental condition, as well as whether he/she and his/her family environment is under threat and whether it is safe for them to reside in the specific Controlled Access Facilities for Temporary Accommodation of Asylum Seekers (CAFTAAS). Then, according to the needs of each victim, the Case Manager, in cooperation with the CAFTAAS' Manager, takes all necessary steps in order to respond to any of the victim's special reception needs (indicatively, the movement to safe housing, the provision of appropriate medical monitoring, the provision of psychosocial support, etc.), by referring to other services or actors within and outside the CAFTAAS'. The victim's consent is a prerequisite for such referrals.

Victims are protected against retaliation before, during and after proceedings. Protection needs are assessed by case managers and prosecutors, who recommend and implement appropriate measures. Victims are kept informed of the progress of their case and of the detention or release status of the perpetrator. Privacy and confidentiality are safeguarded in court. Child victims are approached with child-sensitive methods.

8.2 How do you ensure that victims are provided with realistic and practical information about the progress of the case and whether the perpetrator has been detained or released?

As mentioned above, the agency to which the victim is referred appoints a legal advisor/advocate, who may be present to support the charges and provide relevant information to the victim, in cooperation with the competent services of the Hellenic Police.

It should be noted that, in accordance with the relevant legislation, information on the perpetrator's release from prison is provided, subject to the approval of the public prosecutor's office, if there is a potential or established risk of harm to the victim, unless there is an established risk of harm to the perpetrator due to the disclosure of such information.

Furthermore, when victims contact the specialized services of the Hellenic Police, they are asked to provide their contact details (telephone number and email address) so that, if they wish, information about their case can be sent to their personal email address.

In any case, victims are advised to inform the Hellenic Police department handling their case (if they do not inform the judicial authorities) of any change in their contact details.

As mentioned above, victims of THB have the opportunity to be present at every stage of the criminal proceedings in support of the charge and, if they so declare, have the status of a party at all stages of the criminal trial. This means that they can obtain full knowledge of the relevant case file and be fully informed about the progress of the case. Furthermore, according to the newly introduced provision of paragraph 1 of article 110 of the Criminal Code, when a person convicted of offenses, including those against personal freedom, which include the offense of THB, requests his conditional release after serving part of his sentence, the victim - supporting the charge, has the opportunity to submit his proposals to the competent council that decides on the conditional release and in any case to be notified by any appropriate means of its granting or not.

8.3 How do you ensure respect for the victims' right to safety, privacy and confidentiality during court proceedings? Please refer to Q.8.1 and 8.2 above.

8.4 In how many cases were witness protection measures used for the protection of victims and witnesses of THB, including children? If witness protection measures/programmes are not applied to victims of trafficking, what are the reasons?

To date, no victims of human trafficking have been enrolled in a special witness protection program in Greece. The assessment of the risk to the safety of a victim or witness is based on objective criteria and not solely on their subjective fear, such as documented evidence or a history of violent acts by the perpetrators.

Despite the absence of active enrolment in witness protection programmes, the Hellenic Police implements specialised security measures to protect victims both during the pre-trial proceedings and after their testimony.

Specifically, when taking statements, the victims' home or contact details are not recorded, and their situation is continuously monitored in cooperation with the relevant victim protection agencies. If there is a risk of intimidation or secondary victimization, the Hellenic Police, after informing the competent prosecutor, may request additional protection measures, such as changing the victims' identity details or relocating them, on the basis of a prosecutor's order.

Furthermore, after consulting with the victims, the competent authority cooperates with and informs their countries of origin so that they can take steps, where possible, to protect their families.

8.5 When victim protection is provided by NGOs, how are NGOs resourced and supported to perform this function and how do the police and the prosecution co-operate with NGOs?

The NRM coordinates with all NGOs supporting THB victims, sharing all relevant information on available protection services. This, in addition to capacity building activities provided by the NRM to the NGO professionals, ensures that the work of all involved NGOs is synchronised, orientated and adequately supported.

For criminal and protection measures, NGOs also collaborate closely with the Prosecution and Police Authorities. This partnership covers the investigation of perpetrators, the victim's cooperation in relevant criminal proceedings, the official identification of the victim by the Prosecutor, and the provision of protection services, including securing a Police escort when safety issues arise.

8.6 How do you ensure that child victims of THB are treated in a child-sensitive way and are provided with protection before, during and after judicial proceedings in accordance with the Council of Europe Guidelines on Child Friendly Justice? Are interviews with children conducted in specially designated and adapted spaces by professionals trained to interview children? What measures are taken in order to ensure a limited number of interviews?

During criminal proceedings, the competent law enforcement, prosecuting, and judicial authorities shall take appropriate measures to protect the privacy of victims, considering their personal characteristics as determined by the individual assessment process.

The individual assessment is carried out by the Juvenile Probation and Social Assistance Services of the Ministry of Justice, with the aim of determining the specific protection needs of each victim.

When a minor victim of human trafficking is examined as a witness, a specially trained child psychologist or child psychiatrist is appointed and present as an expert witness. In their absence, this role is assumed by a psychologist or psychiatrist serving in the Independent Offices for the Protection of Minor Victims, or, where these do not operate, by a professional included in the list of experts.

The examination of the minor victim as a witness must be carried out at the Independent Offices for the Protection of Minor Victims of the relevant Court of Appeal District or, where these do not operate, in premises specially designed and adapted for this purpose.

For Attica, the examination is carried out at the Independent Office for the Protection of Minor Victims "Spiti tou Paidiou" (Children's Home) by trained child psychologists or child psychiatrists. It should be noted that, where possible, each examination of the victim is carried out by the same persons, unless this hinders the proper administration of justice.

Under articles 74 and 76 of law 4478/2017, special services called "The Child's Home" were created. Article 227 of the CCP stipulates that children who are victims and witnesses of crimes of personal and sexual freedom, THB, etc., are examined through a special procedure during the criminal proceedings. It is provided that the aforementioned victims are examined in special areas, called "The Child's Home".

In particular, it is provided that the examination of the victim is conducted by a competent authority (prosecutor, investigator, etc.) through a specialist psychologist or psychiatrist, who has received appropriate training. In addition, it is stipulated that the child's testimony is always videotaped, so that the videotaped testimony can be used as evidence and the child does not need to testify in future proceedings.

"The Child's Home" is also suitable for the individual assessment and assessment of the perceptual capacity and mental state of minor victims, the provision of general support services, assistance to all competent authorities for the appropriate and child-friendly examination of the victim during the criminal proceedings, as well as for the creation of appropriate conditions and spaces for their examination and the recording of their testimony.

In cases of victims of sexual exploitation, the relevant interviews are conducted, if the victim so wishes, by a person of the same sex, provided that the progress of the criminal proceedings is not impeded. The minor's testimony is recorded in writing and on electronic audiovisual media, which replaces his or her physical presence in the subsequent stages of the proceedings. If it is not possible to show the minor's statement electronically, their written statement is read out in court.

9. Specialised authorities and co-ordinating bodies (Article 29)

9.1 What budget, staff and resources, including technical means, are put at the disposal of law enforcement bodies specialised in combating and investigating THB?

With the aim to effectively combating the recruitment and trafficking of human beings for the purpose of exploitation, the Hellenic Police has set up a Department, an Office, and Teams to Combat Trafficking in Human Beings.

- At the executive level, the Public Security Directorate of the Hellenic Police Headquarters handles human trafficking issues. whose officers monitor developments daily and, where necessary, intervene with targeted instructions, guidance, and the organization and implementation of relevant training.
- At the operational level, twelve (12) Human Trafficking Prevention Teams (across the country) have been set up and are active, one (1) Department for Combating Trafficking and Smuggling of Human Beings in the Sub-Directorate for Combating Trafficking and Smuggling of Human Beings and Goods of the Directorate for Combating Organized Crime, and one (1) Office for Combating Trafficking and Smuggling of Human Beings in the Department for Combating Trafficking and Smuggling of Human Beings and Goods in the Sub-Directorate for Combating Organized Crime in Northern Greece.

The duties of the Department and the Office for Combating Trafficking and Smuggling of Human Beings consist exclusively of combating human trafficking, prosecuting crimes against sexual freedom and, more generally, the economic exploitation of sexual life, and providing protection and assistance to victims in cooperation with the relevant social agencies and services.

The Anti-Trafficking Teams, among other things, investigate human trafficking cases, seeking (depending on the degree of difficulty of the cases) direct cooperation with the staff of the Department/Office for Combating Trafficking in Human Beings.

In cooperation with the competent services, specialized, up-to-date, and recurring training is provided to the officers of the above Services on how to approach (potential) victims - investigating human trafficking cases.

The investigation of human trafficking cases is thorough and includes, among other things, the performance of special investigative acts and the use of modern scientific techniques. These actions may include, among other things, covert investigation, investigative infiltration, lifting the confidentiality of the content of communications or location and movement data in compliance with the safeguards and procedures provided for by law, as well as the recording of activities or other events outside the home with audio or video devices or other special technical means, the correlation or combination of personal data, etc.

The specialized services of the Hellenic Police have access to adequate technical equipment, which includes, among other things, audio and video recording devices, data analysis programs, and web crawlers for extracting and analyzing information from the internet. In addition, where necessary, aerial surveillance means (drones) or other additional technical means are used.

Finally, the requests for the approval of appropriations for the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings are approved in their entirety, considering the possibilities of our Agency's current budget.

9.2 If your country has specialised units for financial investigations, financial intelligence units and asset and recovery units, please describe whether and how are they used in investigating and prosecuting THB cases. Which special investigation techniques do these units use? Which public and/or private bodies do these specialised financial investigation units co-operate with in relation to THB cases?

The Organized Crime Division of the Hellenic Police – Ministry of Citizen Protection may also conduct financial investigations into human trafficking cases, while also cooperating with other services such as the Hellenic Anti - Money Laundering Authority (FIU - FSU - SFIU) and the Independent Authority for Public Revenue (IARP).

In the context of investigating relevant cases, it is possible to lift the banking and tax secrecy of persons involved and to obtain information from money transfer companies.

For this reason, requests for the lifting of banking secrecy are forwarded to the systemic banks of Greece. Following cooperation with the Hellenic Anti - Money Laundering Authority, it is possible, by decision of the President of the afore-mentioned Authority, the assets of persons accused of human trafficking may be frozen.

Furthermore, the Criminal Investigation Directorate of the Hellenic Police has issued relevant guidelines to the competent operational services on how to search for, seizing, and safely transferring cryptocurrencies contained in private wallets (hot and cold wallets) to the accounts of prosecuting authorities.

10. International co-operation (Article 32)

10.1 How does your country co-operate with other countries to enable victims of THB to realise their right to redress and compensation, including recovery and transfer of unpaid wages after they leave the country in which the exploitation occurred?

The Hellenic Police supports claims for restitution/compensation through: (a) cross-border exchange of information to identify employers/perpetrators and evidence of wage arrears, and (b) economic/financial investigations to identify assets that can be confiscated for the benefit of victims. The exchange of

information takes place mainly through the international police cooperation channels of Europol and INTERPOL I24/7.

10.2 Has your country co-operated with other countries in the investigation and prosecution of THB cases through financial investigations and/or Joint Investigation Teams? Please provide statistics on such cases and examples from practice.

Through Europol's Secure Information Exchange Network (SIENA) in the first half of 2025, 1,596 SIENA messages were exchanged on human trafficking cases and 36 contributions were made to Europol's AP Phoenix analytical work.

Furthermore, the Hellenic Police participated in 20 of the 22 EMPACT OAPs actions for THB, as well as in Joint Action Days (JADs) and Global Actions/Operations.

In addition, it participated in Operational Task Forces supported by Europol, such as OTF RAPAX (Latin American networks – sexual exploitation, money laundering, document fraud) and OTF LOTUS (Chinese networks – economic/sexual exploitation in EU Member States). At the same time, information was circulated through INTERPOL I24/7 and assistance was provided to large-scale operations of the INTERPOL General Secretariat.

10.3 How many mutual legal assistance requests and/or European Investigation Order have you made in THB cases and what was their outcome?

As part of a preliminary investigation by the Athens Public Prosecutor's Office of First Instance, the competent Hellenic Police Service was instructed to issue a European Investigation Order (EIO) in a human trafficking case. This order was duly forwarded to the Athens Public Prosecutor's Office. It should be noted that relevant EIOs or requests for mutual legal assistance (MLA) may also have been issued directly by the judicial authorities handling individual human trafficking cases.

10.4 What forms of international co-operation have proven to be particularly helpful in upholding the rights of victims of trafficking, including children, and prosecuting alleged traffickers?

- Europol-SIENA & AP Phoenix for rapid, secure information exchange and analysis of cross-border networks.
- EMPACT OAPs / JADs for coordinated checks, victim identification, and perpetrator arrests.
- Operational Task Forces (e.g. RAPAX, LOTUS) for targeted transnational investigations.
- INTERPOL I24/7 and participation in GSC/Interpol operations to extend reach beyond the EU.

The above mechanisms contributed both to the dismantling of networks and to the rapid referral/protection of victims through cooperation with national support agencies.

In cases of a human trafficking victim, who is a third-country national, being repatriated to their country of origin or resettled to a third country, the Hellenic NRM may cooperate with the responsible for the NRM authority and/or relevant actors in the destination country. This ensures that the repatriation is carried out in full respect of the victim's rights, security, and the avoidance of re-victimisation. The same cooperation may occur if a Greek national - human trafficking victim - is to be repatriated to Greece from other countries.

Furthermore, the IOM, also participating in the NRM, operates an assisted voluntary return and reintegration (AVRR) programme for third-country nationals. Whenever a THB victim requires voluntary return, the programme involves collaboration between IOM Greece and the IOM office in the victim's country of origin. The same process is followed when a victim of Greek origin is to be returned to Greece from another country. According to the NRM SOPs, the safe return of a child victim is ensured by taking all necessary preparatory steps and cooperating with all competent actors. EKKA, the NRM Operating Authority may mediate, if deemed necessary, in order to establish contact with NRM actors in the other country. Furthermore, the NRM SOPs foresee a risk assessment regarding family ties,

specifically considering the possible involvement of family members in the child's recruitment, transfer and/or exploitation.

10.5 What international co-operation measures are in place to ensure protection and assistance to victims on return from your country to their countries of origin following their participation in criminal proceedings?

The protection and support of victims of human trafficking upon their return to their country of origin is ensured through a coordinated framework of international cooperation, involving the Hellenic Police, the National Referral Mechanism (NRM), and the relevant protection agencies both in Greece and abroad.

The process begins with the activation of the NRM, which takes care of preparing the victim and communicating with the relevant support agencies in the country of origin, so that the return is carried out with respect for the victim's safety and needs. The Hellenic Police contributes operationally by providing risk information and contact points to the authorities of the countries of origin and, where possible, cooperates directly with them to ensure the safe and voluntary repatriation of victims.

At the same time, victim protection agencies in Greece cooperate with their counterparts abroad to connect victims with protection and social reintegration services in their country of origin, ensuring continuity of care and preventing revictimization after their departure from the country.

10.6 What international co-operation measures are in place to protect and assist victims of THB for the purpose of sexual exploitation through online streaming where the perpetrator is a national or habitual resident of your country and elements of the crime have occurred in your country's jurisdiction?

To protect and support victims of human trafficking for sexual exploitation through online streaming, when the perpetrator is a Greek citizen or permanent resident and the elements of the crime are committed within Greek jurisdiction, Greece has developed a multi-level framework for international cooperation.

The Hellenic Police works closely with law enforcement and judicial authorities in other countries and with international organizations such as Europol, INTERPOL, and the SELEC network to ensure effective investigation and rapid protection of victims. Through the Europol–SIENA systems and the AP Phoenix analytical platform, secure information exchange and analysis of cross-border networks operating in cyberspace are carried out. At the same time, as part of EMPACT OAPs and JADs actions, coordinated checks and operations are organized to locate victims and arrest perpetrators.

Greece also participates in Operational Task Forces (RAPAX, LOTUS), which conduct targeted transnational investigations, while INTERPOL I24/7 allows for direct communication and extension of operational reach beyond the European Union. In cases of complex or multinational investigations, it is decided – following Europol operational meetings – to set up Joint Investigation Teams (JITs) or issue European Investigation Orders (EIOs) to carry out specific investigative actions.

Recognizing the use of the internet as a means of facilitating human trafficking is a specific action under the EMPACT priority to combat human trafficking, under which annual meetings are held to exchange information and best practices between Member States. In addition, the Service, in cooperation with the Cybercrime Prosecution Unit, has requested – following court decisions – account data from online platforms (e.g. Google, TikTok) that are alleged to have been used to commit human trafficking offences.

11. Cross-cutting questions

11.1 What steps are taken to ensure that victims of THB have equal access to justice and effective remedies, irrespective of their immigration status and the form of exploitation?

In accordance with the legislation in force (Penal Code, Code of Criminal Procedure, Immigration Code, Presidential Decree 233/2003, etc.), specific measures are taken to ensure that victims of human trafficking have equal access to justice and effective legal remedies, regardless of their immigration status or the form of exploitation. For example:

- Recognition as victims by the Public Prosecutor, without the need for prior criminal prosecution.
- Special residence permits for victims, so that they are not deprived of their rights due to illegal residence.
- Right to protection and support (care, housing, psychological support, period of reflection). Information and free legal assistance/interpretation, for full participation in the process.
- Right to appear as civil parties and claim compensation.
- Special care for minor victims with "tailored" protection.

In conclusion, access to justice and legal remedies is guaranteed without discrimination based on residence status.

11.2 What steps are taken to ensure that criminal, civil, labour and administrative proceedings concerning victims of THB are gender-sensitive?

Greek legislation (Law 4531/2018 and Law 4604/2019) ensures that criminal, civil, labour, and administrative proceedings for victims of human trafficking are conducted with gender sensitivity, through the ratification of the Istanbul Convention and the integration of gender equality into all policies and procedures. Equality mechanisms are provided for at central, regional, and local levels, positive measures in favour of women and vulnerable groups, as well as support services that prevent secondary victimization, thus ensuring full protection and respect for the gender-specific needs of victims.

11.3 What steps are taken to ensure that procedures for obtaining access to justice and remedies are child-sensitive, readily accessible to children and their representatives, and give weight to the child's views?

Greek legislation (Penal Code, Code of Criminal Procedure, Immigration Code, Law 4531/2018 ratifying the Istanbul Convention, Law 4604/2019 on substantive gender equality, etc.) ensures that procedures for access to justice and legal remedies for child victims of trafficking are child-centered (best interest of the child).

Provision is made for examination in appropriate conditions by specially trained staff, in the presence of a psychologist or social worker, the provision of free legal assistance and interpretation, as well as participation through legal representatives or guardians.

At the same time, in accordance with the Convention on the Rights of the Child, substantial weight is given to the views of the child, in accordance with their age and maturity, so that the procedures are truly accessible, protective, and participatory.

11.4 What steps are taken to ensure that private entities take steps to prevent and eradicate trafficking from their business or supply chains and to support the rehabilitation and recovery of victims? What options exist for victims of trafficking to access effective remedies from businesses implicated in human trafficking?

In 2024, **EKKA** partnered with two Greek NGOs, Solidarity Now and KMOP (Social Action and Innovation Centre), in the context of the PROCAP project (PROtection of victims of trafficking, CAPacity building and support to key stakeholders), co-funded by the European Union under the Programme Greece – Asylum, Migration and Integration Fund (AMIF) 2021-2027) to ensure a holistic approach to victim protection, through (a) the operation of mobile units in Attica and Central Macedonia region providing direct services, and (b) the development of training material for front-line professionals, including those of the private sector.

In that context:

- On October 18, 2024, EKKA in collaboration with KMOP and Solidarity Now organised an online event entitled "Trafficking in Human Beings: Break the Chain" on the occasion of the EU Anti-Trafficking Day. The event was attended by 350 professionals from the public and private sector, with a focus on airport community, hotel industry, teachers and education staff, Reception and Identification Service employees and Labour Inspectors, demonstrating a growing awareness on the phenomenon of human trafficking and the importance of multilateral action, including the participation of the corporate sector. The head of the Office of the National Rapporteur/MFA, Dr. Ioannis Brachos, delivered the introductory speech.
- During 2024-2025, EKKA in collaboration with KMOP organised training sessions on prevention steps and victim protection in the context of human trafficking, in order to facilitate timely identification and provision of assistance, targeting professionals working in the private sector, such as transportation and tourism.

In view of Regulation (EU) 2024/3015 of the European Parliament and of the Council of 27 November 2024 regarding the prohibition of the placing on the Union market of products manufactured by forced labour, the Hellenic Labour Inspectorate, in collaboration with the OSCE (OSR/CTHB) co-organised an information session for companies employing more than 1,000 people on the topic "*Sustainable Supply Chains: Promoting human rights and social responsibility in light of the EU Directive on corporate sustainability due diligence*", that was held on 25 June 2025 at the Athens Chamber of Commerce and Industry. The event was under the auspices of the Office of the National Rapporteur on Trafficking in Human Beings of the Ministry of Foreign Affairs (ONR/MFA).

Social Partners and stakeholders such as the UN Global Compact Network Greece, the International Organization for Migration, the NGO UNSEEN, and the Hellenic Network for Corporate Social Responsibility participated as speakers in the session addressing business executives. The aim of the conference was to inform the largest businesses in Greece about the new changes that the Regulation brings to Greek law, as well as the structural measures that businesses need to take in the coming years in order to achieve harmonization.

11.5 What legal, policy and practical measures are taken in your country to prevent and detect situations where corruption facilitates human trafficking and infringes the right of victims of THB of access to justice and effective remedies? Please provide information on any known or proven cases of corruption or related misconduct of public officials in THB cases and any sanctions issued.

Prevention cases of corruption that may facilitate human trafficking or hinder victims' access to justice and effective legal remedies, Greece has developed an institutional, operational, and disciplinary control framework.

A central role is played by the Internal Affairs Service of the Security Forces (Y.E.Y.S.A.), which is responsible for investigating complaints or indications of corruption, abuse of power, and related criminal or disciplinary offenses by law enforcement officials. This Service acts independently, has prosecutorial oversight, and applies transparent control procedures to prevent the cover-up or involvement of public officials in human trafficking crimes.

From 2022 to date, Y.E.Y.S.A. has handled two cases of human trafficking and pimping involving police officers – of which in summary proceedings. These investigations led to criminal prosecutions and, in one case, to provisional detention. The relevant cases are pending before the criminal courts.

Part II – Country-specific follow-up questions

12. Please provide information on new developments in your country since GRETA's second evaluation report concerning:

- emerging trends of trafficking in human beings (new forms of exploitation, new recruitment methods, vulnerable groups, gender-specific aspects of trafficking, child trafficking);

According to the 2022 – 2025 (first half) NRM statistic data, the following trends have emerged:

- ⇒ In years 2022-2023, a high number of victims recorded was recruited and/or exploited in Türkiye, as one of the most common transit destinations on the route to Europe. During the same period, there was a significant number of reported cases of women victims from Sierra Leone who had been recruited in Guinea.
- ⇒ In 2023, there was a sharp increase in the number of Latin American victims reported for sexual exploitation in Greece. This finding was linked to major police operations resulting in the dismantling of two OCGs exploiting women, mostly from Colombia and Venezuela, to provide sexual services in big urban centres. The same trend was recorded in 2024 with the number of cases reported to the NRM being significantly lower though.
- ⇒ In the second half of 2023, another major operation by the Hellenic Police resulted in the dismantling of an OCG exploiting women from Eastern European countries, mostly Georgia and Albania, for the removal of ova and surrogacy services.
- ⇒ In 2024, forced labour was recorded as the prevailing form of human trafficking unlike all previous years since the 2019 NRM launching. In the majority of cases victims were women exploited as domestic workers/caretakers in their country of origin or other third country, followed by cases of men victims working in agriculture including cases where exploitation took place in Greece.
- ⇒ In fact, during the second semester of 2024, an increase in the number of reported cases of victims of labour exploitation within Greece was recorded. This finding was linked to major police operations resulting in the dismantling of OCGs exploiting foreign nationals in the agricultural sector; the majority of victims were citizens of South/ Southeast Asian countries who had already been residing and working in Balkan countries before being smuggled into Greece and further exploited. The same trend was recorded in the first semester of 2025, as well.
- ⇒ Gender, irregular movement and dire economic conditions are among the major risk factors that increase one's susceptibility to exploitation. As a matter of fact, numbers show that the vast majority of victims of sexual exploitation reported to the NRM are women and girls, while the majority of victims who are third-country nationals are asylum seekers/refugees, having being exploited on their route to Europe. A high number of cases reported to the NRM, also, show that the exploitation of a person's vulnerable situation, including poverty and homelessness, is prevailing among the means reported to be used by recruiters. As far as forced labour is concerned, in the majority of cases perpetrators delude victims about both working and living conditions and take advantage of their position of vulnerability including unemployment and/or dire economic conditions.
- ⇒ Communication apps and social media platforms have been reported as a way of communication used mainly at the stage of recruitment, while online vacancy advertisements may also be used as means to lure victims into contacting the perpetrators in search of work. In regard to the exploitation stage, online pornography, or the use of websites dedicated to arranging appointments with clients of sexual services, have been reported. Among the most common digital platforms/ apps reported to have been used for recruitment are Facebook, Instagram, Telegram, WhatsApp and, most recently in cases of labour exploitation, Tik Tok.

According to the Hellenic Police/Ministry of Citizen Protection Human trafficking in our country is a multifaceted phenomenon with different manifestations: sexual exploitation predominates, labour exploitation is on the rise, begging mainly affects children, forced marriage concerns vulnerable women with a migrant background, while the involvement of minors in criminal activities highlights new challenges. Specifically:

- ⇒ Sexual exploitation remains the dominant form. Perpetrators recruit victims with false promises of work or through the "lover boy" technique, creating bonds of debt and emotional dependence. The internet and social networks are used extensively for recruitment and advertising, while places of exploitation include illegal brothels, apartments-'safe houses', strip clubs, "wellness" centers, as well as street prostitution or online appointments with a "closed clientele." The victims are mainly women from Eastern Europe and Latin America, but underage girls are also reported. Physical violence is declining, giving way to psychological control and economic dependence.
 - ⇒ Labour exploitation is on the rise. It mainly concerns agricultural activities, cleaning services, and other manual labour. Recruitment is carried out with promises of legal work and high wages, while victims ultimately suffer document deprivation, restriction of freedom, and violence. Fake travel documents are used, and in many cases the perpetrators isolate the victims in remote areas. The victims come mainly from countries in Asia and Africa, and the activity is linked to cross-border networks.
 - ⇒ The exploitation of begging largely involves minors, with the direct involvement of parents or relatives either as perpetrators or as individuals who "give away" their children. The victims are kept under constant control through violence, threats, and isolation, while the exploitation takes place in squares, metro stations, commercial areas, and tourist spots. In the majority of cases, the perpetrators act alone, but there have also been cases of organised networks.
 - ⇒ Recruitment and trafficking for the purpose of forced marriage mainly concerns foreign women, often asylum seekers or migrants without a stable residence status. Recruitment takes place through false promises or third-party mediation, followed by forced marriage or even "sale" to third parties. Perpetrators maintain control through violence, threats, deprivation of documents, and restriction of movement. Both local and foreign perpetrators have been identified, and there is a cross-border dimension to the problem.
 - ⇒ Recruitment and trafficking for the purpose of exploitation in criminal activities occurs in limited circumstances. The victims are mainly minors or socially and economically vulnerable young people who are recruited to participate in criminal acts. The perpetrators are mainly Greek, often with family or close social ties to the victims, and the cross-border dimension is not pronounced. This form highlights the exploitation of children for criminal purposes.
- the legislation and regulations relevant to action against THB (e.g. criminalisation of THB, identification and assistance of victims of THB, recovery and reflection period, residence permit, supply chains, public procurement);

The Hellenic Criminal Code (Law no 4619/2019) foresees offences under the concept of trafficking in human beings, as listed below:

- Trafficking in Human Beings - Article 323A (including child victims)
- Sexual Acts with/in front of minors - Article 339
- Child Abuse - Article 342
- Child sexual tourism - Article 348 par. 2
- Child Pornography - Article 348A
- Procuring Children for sexual purposes - Article 348B
- Procuring (Pimping) - Article 349 (including child victims)
- Sexual Acts with a minor against payment - Article 351A

- ⇒ Human trafficking crimes committed against a child are qualified as aggravated offenses. Article 323A -Trafficking in Human Beings of the Hellenic Criminal Code foresees that the offense directed against children constitutes aggravating circumstances for the perpetrator(s):
“(…) 3. The action of the previous paragraphs is punished with at least ten (10) years imprisonment and a fine when: (...) 4. The penalties of the previous paragraph shall apply to the action of paragraphs 1 and 2 when it is directed against a minor, even when performed without the use of the means referred to therein. The same penalties apply to anyone who recruits a minor by using the means of paragraphs 1 and 2 for the purpose of using him in armed operations.”
- ⇒ Purchase of sex from a minor is a criminal offense irrespective of the knowledge of the buyer/client.
Article 351A - Sexual Act with a Minor Against Payment of the Hellenic Criminal Code foresees that sexual acts with minors against any kind of payment are punishable regardless of the buyer’s knowledge of the fact that the victim is a child:
“1. A sexual act with a minor committed by an adult for financial or other material benefits, or a sexual act between minors instigated by an adult in the same manner and performed in front of them or another adult is punishable: a) with imprisonment of at least ten years and a fine, in case that the victim has not reached the age of twelve; b) with imprisonment and a fine, in case that the victim has reached the age of twelve, but not the age of fifteen and; c) with imprisonment of at least three years and a fine, in case that the victim has reached the age of fifteen(…)”
- ⇒ Trafficking in children for the purpose of forced begging is a criminal offense.
The Hellenic Criminal Code foresees forced begging as a form of exploitation included in the list of exploitative purposes of perpetrators in the context of trafficking in human beings, as follows:
Article 323A - Trafficking in Human Beings:
- par. 5 foresees that “(…) The concept of “exploitation” in the preceding paragraphs includes the acquisition of unlawful economic benefit from: (...) (c) the victim’s work or begging (labour exploitation); (...)” The offence, as described above, may refer to either adult or child victims.
-par. 7 foresees that “Anyone who forces minors into begging, without using the means of paragraphs 1 and 2, with the purpose of exploiting their income, shall be punished with imprisonment and a fine.”
- ⇒ Victims’ rights and a robust protection framework is, also, provided for by law [Hellenic Criminal Code & Criminal Procedure Code, Law no 3064/2002, Presidential Decree no 233/2003, Law no 4478/2017, Immigration Code (Law no 5038/2023)] regardless of the form of exploitation the victim has suffered and at all times (before, during or after the initiation of criminal proceedings). The existing protection framework applies to all presumed victims identified as such within the Hellenic territory, regardless of their nationality/or that of the perpetrator(s), their legal status, and the place and time of exploitation, and following an appropriate risk and needs assessment.
Protective measures may include provision of accommodation, healthcare, material assistance, psychosocial support, legal counselling, integration services, including employability support, language lessons, vocational training, school enrolment and drug rehabilitation programmes, where relevant.
- ⇒ A fundamental protective provision refers to the Official Procedure of Victim Status Declaration, under Law 5038/2023. In this context, an Order issued by the Public Prosecutor is requested in order for one to be declared as human trafficking victim and receive a special type of residence permit. A 3-month (and up to 5 months for minors) recovery and reflection period is also foreseen.

On May 23, 2022, the Deputy Public Prosecutor of the Supreme Court of the Hellenic Republic, issued circular no. 7 on the said procedure, highlighting the victim-centred and protective nature of the existing legal framework for the protection of victims, and providing guidance to the competent Prosecution Authorities on the procedure of the issuance of the relevant Order, as well as on granting a reflection period to third country nationals (available [here](#)).

The circular intended to provide guidelines on a uniform procedure complying with EU legislation on human trafficking. To this end, and in accordance with the objectives, the Deputy Public Prosecutor of the Supreme Court of the Hellenic Republic has:

- a. Suggested that merely indication(s) of one being a victim of human trafficking should be sufficient for the competent Prosecution Authorities to issue the relevant Order.
- b. Reaffirmed that the relevant Order can be issued regardless of the initiation of prosecution or the victim's willingness to report the offence and cooperate with the Hellenic Police.
- c. Suggested that the relevant Order should be issued with an indefinite validity period (however, with the possibility of one being revoked in case there is evidence proving one not to be a human trafficking victim), thus advising against possible future practices of the competent Prosecution Authorities issuing relevant Orders with a limited validity period.
- d. Suggested that a 3-month reflection period should be granted to victims of human trafficking, without prior relevant request, and regardless of the issuance of the relevant Order, which should not be a prerequisite.

The circular is considered a significant development introducing a victim-centred and human-rights-based approach with a binding force within the context of the Prosecution Authority aiming at shaping behaviours and promoting practices from which the respective authority cannot refrain.

Regarding legislation which regulates the procedure for public procurement Article 18 and Article 73, paragraph 1 of the Law 4412/2016 on Public Contracts, as amended by Law 4782/2021 provides for the exclusion of entities which are found to be involved in human trafficking.

Finally, an important recent development is that by virtue of Article 49 of Law 5239/2025 Fair work for all: Simplification of Legislation – Support to worker – Protection in Practice – Pension regulations and other provisions (OG 178/A' /17.10.2025), the 2014 Protocol to the Forced Labour Convention (No. 29) of the ILO was ratified by Greece and shall be officially deposited with the ILO Director General in due course, with the view to its entry into force following a period of one year after the formal registration, in accordance with its final provisions.

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

The Office of the National Rapporteur on Combating Trafficking in Human Beings (ONR) of the Ministry of Foreign Affairs is responsible for the development, coordination and implementation of a national strategy to combat trafficking in human beings at the levels of prevention, repression and prosecution of perpetrators, as well as protection and assistance to victims of trafficking.

In particular, the Office of the National Rapporteur is responsible for:

1. Coordinating all relevant agencies and non-governmental organizations with regard to the process of identifying, locating and assisting potential victims of human trafficking,
2. Ensuring, through the organisation of training programs, the prevention and combating trafficking in human beings,

3. Cooperating with the law enforcement and judicial authorities, and with all national and international bodies involved in combating the crime, in order to collect statistics.
4. Drawing up the annual national report, which records the statistics on identified incidents of trafficking in human beings and the assessments of new trends resulting from their study, and in which the Office of the National Rapporteur proposes measures to deal more effectively with trafficking in human beings.
5. Representing the country in the Network of National Rapporteurs or equivalent mechanisms of the European Union on trafficking in human beings, as well as in international organisations.

The national legal framework for combating trafficking in human beings is fully harmonised with the relevant international and European conventions and directives. In particular, our country has ratified the conventions of the UN (Law 3875/2010 - Ratification and implementation of the UN Convention against Transnational Organized Crime and its three Protocols) and of the Council of Europe (Law 4216/2013 - Convention of the CoE for Action against Trafficking in Human Beings) and has transposed the European Directive 2011/36/EU into the national law. Following the transposition of the European Directive into the national legal framework by Law 4198/2013 (on the Prevention and Combating of Trafficking in Human Beings and Protection of Victims), as amended by Law 4781/2021, the Ministry of Foreign Affairs performs the role of national coordinating authority for the fight against trafficking in human beings, through the Office of the National Rapporteur on Trafficking in Human Beings.

The creation of the National Referral Mechanism for the protection of victims of human trafficking (NRM) was a key priority of the ONR.

In its 7th year of operation, since its 2019 launching, the Hellenic NRM, administered by EKKA and supervised/coordinated by the Office of the National Rapporteur, has expanded its impact through significant developments, as follows:

- To date, 59 Civil Society organisations have joined the Hellenic NRM, along numerous state agencies that might detect, identify and/or provide protection services to (presumed) human trafficking victims in their everyday practice. A list of all NRM participating actors is available in English [here](#).
- NRM participating actors have familiarised with the NRM reporting procedure as proved by a steady communication pathway and a close collaboration that have been established, taking into consideration the gradual increase in the number of cases reported since 2019 (please refer to the NRM 2024 Annual Report [here](#)).
- Publication of 6 annual reports, to date, presenting reliable data on victims' history of human trafficking (i.e. recruitment phase, transfer/transportation, reception and/or harbouring, exploitation phase and the specific circumstances, inter alia), as well as victims' current situation, including demographic data, information on protection services being or having been provided and on participation in criminal proceedings, which is required for the holistic assessment of each victim's vulnerability and the detection of additional needs ([available here](#)). The relevant information is gathered and analysed in the context of reports received by EKKA, referring to both adult and child victims detected in Greece regardless of the place and time of exploitation.
- Continuous updates of the NRM SOPs to be applied on a national level including all necessary steps in the process of detection, identification and protection of victims ([available here](#)).
- During the reporting period, a specialised edition of SOPs was issued by the Hellenic Reception & Identification Service (RIS) of the Ministry of Migration & Asylum in consultation with EKKA and the General Secretariat for Vulnerable Persons & Institutional Protection; due to the special conditions and operating regulations of the Reception and Identification Centres (RICs) and other accommodation facilities for asylum seekers, administered by RIS, this edition of SOPs had been developed in the past, with the aim of providing guidance to field professionals. However, recent organisational changes and legal amendments demanded the reviewing of the existing procedures to ensure their relevance to the current context.

- EKKA has recently developed guidelines for front-line professionals on the identification of victims of domestic servitude with a focus on the particularities of this very form of human trafficking, the existing legal framework and relevant indicators; the English version is available here.
- Continuous support to front-line professionals provided by EKKA; it entails day-to-day contact, provision of guidelines on all protection stages for reported cases and information dissemination with constant updates on the NRM operation and services available for victims.
- Provision of trainings targeting national-authority and (I)NGO/IO staff, for the purpose of building capacity for front-line professionals for early detection and provision of adequate support to human trafficking victims in line with the NRM SOPs and the existing legal framework.
- EKKA has been building partnerships with IOs and NGOs for the implementation of various projects to enhance both quantity and quality of direct services for human trafficking victims, and to inform front-line professionals on the multilateral dimensions of the phenomenon and facilitate early victim identification and effective case management, including the provision of adequate information and support towards victims.

Please refer to the following projects for more information:

- ⇒ Albania and Greece, supporting an effective transnational referral mechanism and cross border child protection for victims and possible victims of trafficking, funded by the Permanent Representation of France at UN Office in Vienna.
- ⇒ PROCAP / PROtection of victims of trafficking, CAPacity building and support to key stakeholders, co-funded by the European Union under the Programme Greece – Asylum, Migration and Integration Fund (AMIF) 2021-2027, as a Specific Action on the provision of services to human trafficking victims who are third-country nationals.
- ⇒ Educational staff seminars and skills development sessions to support Victims of Human Trafficking with the aim of their reintegration, funded by the Ministry of Migration and Asylum of the Hellenic Republic – Asylum, Migration, and Integration Fund 2021-2027, as a Specific Action on the provision of services to victims of trafficking in human beings who are third-country nationals.
- ⇒ Coordination services for victims of human trafficking in the South-Eastern Balkans, funded by the Internal Security Fund (2021-2027), as a Specific Action aiming to offer services to human trafficking victims detected by street-workers.

-During 2024, EKKA, under the auspices of the ONR/MFA, launched a new working group, focused on the establishment of a Human Trafficking Survivors' Body, according to the good practice of a National Survivors of Trafficking Advisory Council (NSTAC) promoted by OSCE/ODHIR, through the active participation of survivors into the existing protection network for human trafficking victims in Greece, in the context of the NRM. This initiative promotes the idea that survivors will be included in the development process of the said body taking into consideration their needs and own vision, with the cooperation and support of multi-agency and multidisciplinary NRM stakeholders

In order to effectively combat the recruitment and trafficking of human beings for the purpose of exploitation, at the executive, as well as the operational level, the Hellenic Police/Ministry of Citizen Protection has set up a Department, an Office, and Teams to Combat Trafficking in Human Beings.

For further information please refer to Q.9.1 above.

A significant development is the recently established interministerial, interagency and interdisciplinary Working Group aimed at strengthening the fight against human trafficking, which will be chaired by the Secretary General for Vulnerable Persons and Institutional Protection of the Greek Ministry of Migration and Asylum, with the participation of representatives from Ministries, the judiciary, the Hellenic Police and the Greek member of GRETA. This group will seek to contribute to the review and formulation of the National Action Plan, to discuss new forms of technology-enabled trafficking and to identify problems in the implementation of existing legislation that lead to perpetrators' impunity and insufficient protection of victims. At the same time, it intends to put forward proposals for improving legislation in order to enhance the prosecution of offenders and the protection of victims, as well as proposals for introducing new provisions or amending existing ones, for the purpose of incorporating Directive (EU) 2024/1712, which amended Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims.

- the current national strategy and/or action plan for combating trafficking in human beings (objectives and main activities, bodies responsible for its implementation, budget, monitoring and evaluation of results);

Greece continuously and consistently demonstrates its political will to enhance all instruments at its disposal to fight trafficking in human beings. The establishment of the Office of the National Rapporteur on Trafficking in Human Beings (ONR) at the Ministry of Foreign Affairs in 2013 was followed by the National Referral Mechanism for the protection and support of victims of trafficking (NRM) in 2016, and its official launching in January 2019. Furthermore, the Greek Parliament established in 2016 a sub-committee on human trafficking tasked to review all relevant national developments, while relevant legislation was updated. Greece has established a strong and comprehensive legal framework to manage and tackle the complex crime of human trafficking.

The Office of National Rapporteur in the framework of the actions of the previous National Action Plan (2019-2023) is in the process of updating it with the collaboration of all the relevant state and non-state actors, to renew our strategy and adjust it to the ever-changing nature of the crime for successfully combating THB in all its forms at the institutional, legislative and practical levels, while taking into consideration the EU Strategy on Combating Trafficking in Human Beings, the amendment of the Anti-Trafficking Directive and the recommendations of all relevant international organizations (GRETA/Council of Europe, OSCE, UNODC, UNHCR, IOM, etc.).

In this vein, the Office of the OSCE Special Representative and Co-ordinator on Combating Trafficking in Human Beings, in cooperation with the Office of the National Rapporteur of the Ministry of Foreign Affairs, organized a seminar on strengthening Greece's National Action Plan on preventing and combating trafficking in human beings.

The seminar was held on 25 - 26 June 2024, at the Ministry of Foreign Affairs premises. The first day (Tuesday, 25/6/2024) was addressed to the officers of the Public Administration and the Independent Authorities, while the second day (Wednesday, 26/6/2024) was devoted to the Non-Governmental Organizations (NGOs) and International Organizations.

Following this event the ONR has set up two working groups, with the collaboration of all the relevant state and non-state actors. The 1st WG includes the public sector's actors and the 2nd WG consists of the NGO's participating in NRM. Our aim is for the first WG to present the proposals of public bodies for the THB and then to consult the 2nd WG, where civil society is involved.

A first draft of our updated National Strategy and Action Plan for the Prevention and Combating of Trafficking in Human Beings and the Protection of Victims is already prepared, and we may roughly estimate that a final draft will be ready, the soonest, in the first half of 2026.

Actions taken by the Hellenic Police to combat human trafficking

A) Strategy of the Ministry of Citizen Protection to combat human trafficking 2021-2025

The Ministry of Citizen Protection has developed a public strategy to combat human trafficking, thereby demonstrating its commitment to preventing and combating the recruitment and trafficking of people for the purpose of exploitation.

This strategy is based on the following key objectives:

- Better coordination and strengthening of the operational response of the Hellenic Police.
- Early identification and protection of victims, with an emphasis on preventing secondary victimization, protecting minors, and especially those from vulnerable social groups.
- Prevention of human trafficking and protection of vulnerable groups from potential victimization.
- Effective response to organized human trafficking networks.
- Strengthening of interagency cooperation.
- Strengthening cross-border cooperation to tackle cases involving international criminal groups.

B) Strategic & Operational Plan of the Hellenic Police 2021-2025

The effective combating of human trafficking in all its forms is central to the "Strategic & Operational Plan of the Hellenic Police 2021-2025" drawn up by the Hellenic Police Headquarters. The program serves as a guide for all Police Services, providing clear direction and strengthening cooperation and coordination. It is a reference point for initiatives by all Police Services and is defined by the following objectives and actions:

- Conducting checks and investigations to identify all forms of human trafficking.
 - Training staff on how to deal with human trafficking.
 - Strengthening cooperation with relevant services and agencies.
 - Targeted actions to combat the trafficking of women and minors for the purpose of sexual and labour exploitation.
 - Full utilization of technological means and applications.
- recent case law concerning THB for different forms of exploitation.

13. Please provide information on measures taken in your country in respect to the following recommendations made in GRETA's second evaluation report:

- facilitate and guarantee access to compensation for victims of THB, including by ensuring that state compensation is effectively accessible to them; Please see above Q.1.1 & 3.6.
- ensure that all possible foreign victims of THB, including EU and EEA citizens, are systematically informed of the possibility to be granted a recovery and reflection period and are effectively granted such a period; Please see above Q.1.1.
- make full use of the available measures to protect victims of THB, including children, and to prevent intimidation during the investigation and during and after the court proceedings;

Victims are protected against retaliation before, during and after proceedings. Protection needs are assessed by case managers and prosecutors, who recommend and implement appropriate measures. Victims are kept informed of the progress of their case and of the detention or release status of the perpetrator. Privacy and confidentiality are safeguarded in court. Child victims are approached with child-sensitive methods. Please see also above Q.8.1, 8.4, 8.6 & 10.4.

- increase the number of labour inspectors and ensure that their mandate includes a concrete focus on detecting potential victims of THB for labour exploitation;

The Hellenic Labour Inspectorate actively participates annually in the Joint Action Days organized with Europol and ELA. The effective identification of businesses with serious violations of labour legislation, that may conceal labour exploitation, has been observed in the framework of the joint inspections of Labour Inspectors and the Hellenic Police.

During the period 2022 to 2024, the Joint Action Days have been very effective regarding the systematic fight against labour exploitation, as reflected in the following table:

YEAR	NUMBER OF INSPECTIONS	VIOLATIONS OF LABOUR LEGISLATION	NUMBER OF IMPOSED FINES	FINE AMMOUNT (EURO)	COMPLAINT REPORTS
2024	299	126	112	891.450	3
2023	436	200	216	1.411.400	10
2022	318	105	87	542.450	-

In 2025, the Labour Inspectorate once again participated in the Joint Action Days which took place in September 2025. In accordance with the target set for 2025, inspections in sectors of economic activity where third-country nationals -who are likely to face conditions of labour exploitation- are employed, are a priority for the Labour Inspectorate.

The relevant training of Labour Inspectors on issues of identifying potential victims of human trafficking has increased significantly in recent years. Thus, Labour Inspectors are able to identify and refer potential victims of human trafficking. Their potential was mainly enhanced by the following actions:

1. With the signing of the memorandum of cooperation between the Labour Inspectorate and the NGO A21 in December 2022 a systematic training of Labour Inspectors on issues of identifying indications of labour exploitation across the country began. Labour Inspectors were trained with the contribution of officials from the Hellenic Police and the Prosecutor's Office in the identification and referral of victims.

More specifically, the following seminars were held at the central and regional directorates of the Labour Inspectorate in the years 2023-2024: In 2023, four (4) in-person trainings were held for Labour Inspectors throughout Greece: two (2) workshops in Athens (May, June), one (1) in Thessaloniki (October) and one (1) in Heraklion (May). For the year 2024, in-person trainings continued throughout Greece, four (4) in total: one (1) workshop in Patras (April), one (1) in Alexandroupoli (June) and one (1) in Larissa (September). The majority of the trainees were Labour Inspectors and Police Officers.

2. Through systematic cooperation with competent bodies and with civil society. The Labour Inspectorate actively participates in discussions, trainings and information campaigns organized by civil society, co-competent state bodies as well as international organizations.

More specifically, for 2023, the following collaborations were carried out:

a. Participation in the presentation of the project "Eradicating-Enhancing Prevention and multi-agency cooperation against Trafficking", which was implemented by the Center for Security Studies (KE.ME.A), the KMOP - Center for Social Action and Innovation and the Hellenic Police and concerns multi-sectoral cooperation for the joint effective response to the phenomenon by the co-competent bodies. Furthermore, the Labour Inspectorate was requested to participate in the formulation of policy proposals and in the evaluation of a single practical guide

on human trafficking under publication, which will be accessible to all co-competent bodies for human trafficking.

b. Participation in an OSCE (OSR/CTHB) workshop co-organized with the Office of National Rapporteur (ONR/MFA) "On strengthening the prevention of trafficking in human beings based on the OSCE Recommendations against Trafficking in Human Beings amid mass refugee flows from Ukraine" (Athens, 11.7.2023). The aim of the workshop was to identify the tools used by national actors for the effective protection of Ukrainian refugees.

For the year 2024:

As part of the awareness raising activities, the Labour Inspectorate participated with a speaker in the informative online seminar on the topic "Human Trafficking: Break the Chain", on 18.10.2024, the European Day against Human Trafficking. The executives from the Office of the National Rapporteur for Combating Human Trafficking and the Hellenic Police were part of the training team. The seminar was attended by civil society organizations, educators and workers in reception and identification services.

Furthermore, in September 2025, in the context of assisting the work of Labour Inspectors, a detailed manual for the effective identification of victims of human trafficking was sent by the Central Service of the Labour Inspectorate to all local departments. The manual, which was compiled by Labour Inspectors trained in human trafficking issues, describes in detail the indications of labour exploitation, provides instructions on how Labour Inspectors should interview workers - potential victims - while thoroughly describing the method of cooperation with the Police, the Prosecution Authorities and the National Referral Mechanism (NRM).

Based on the above training and actions, it is important to emphasize that the existing personnel of Labour Inspectors is capable of identifying and effectively referring potential victims to the National Referral Mechanism, as well as cooperating with the Hellenic Police and the Prosecution Authorities in human trafficking cases. In any case, there is a goal of further strengthening the human resources potential of the Labour Inspectorate.

- strengthen the monitoring of recruitment and temporary work agencies.

Within the framework of the annual planning of the Labor Inspectorate, the priority is given to the temporary employment agencies and recruitment agencies as they constitute a sector with a high risk of labor exploitation.

The following table highlights the emphasis given to the increase of inspections in recruitment and temporary employment agencies from 2022 to 2024.

YEAR	NUMBER OF INSPECTIONS IN RECRUITMENT AND TEMPORARY EMPLOYMENT AGENCIES	NUMBER OF FINES	FINES AMOUNT (EURO)
2024	173	80	538.600
2023	158	94	536.650
2022	74	32	73.820

Part III - Statistics on THB

14. Please provide the following statistics, per year starting with 2022, where available disaggregated as indicated below.

See links:

- [APPENDIX 1 – Statistics - Ministry of Justice](#)
- [APPENDIX 2 – Statistics – Hellenic Police](#)
- [APPENDIX 3 – Number of victims](#)
- [APPENDIX 4 – Victims of THB 2022-2025 MoMA](#)

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- Number of presumed victims and identified victims of THB in the sense of having been recognised by a state institution or mandated NGO as bearers of rights to services provided for by the Convention (with breakdown by sex, age, nationality, form of exploitation, internal or transnational trafficking, and body which identified them).
 - Number of victims of THB identified as part of the asylum procedure (disaggregated by sex, age, nationality, form of exploitation).
 - Number of victims of THB who received assistance (disaggregated by sex, age, nationality, form of exploitation, internal or transnational trafficking).
 - Number of child victims of THB who were appointed legal guardians.
 - Number of victims of THB granted a recovery and reflection period (disaggregated by sex, age, nationality, form of exploitation).
 - Number of victims of THB granted a residence permit, with an indication of the type of the permit and its duration (disaggregated by sex, age, nationality, form of exploitation).
 - Number of persons given refugee status or subsidiary/complementary protection on the grounds of being victims of THB (disaggregated by sex, age, nationality, form of exploitation).
 - Number of victims of THB who claimed compensation, who were granted compensation and who effectively received compensation (disaggregated by sex, age, nationality, form of exploitation, with an indication of whether the compensation was provided by the perpetrator or the State, and the amount awarded).
 - Number of victims of THB who received another form of financial support from the State, with the indication of the amount received.
 - Number of victims of THB who received free legal aid.
 - Number of victims of THB who were returned or repatriated to/from your country (disaggregated by sex, age, country of destination, form of exploitation).
 - Number of investigations into THB cases (disaggregated by type of exploitation, with an indication of the number of victims concerned).
 - Number of prosecutions in THB cases (disaggregated by type of exploitation, with an indication of the number of victims and defendants concerned).
 - Number of convicted perpetrators of THB (disaggregated by sex, age, nationality, form of exploitation).
 - Number of convictions for THB, with an indication of the form of exploitation, whether the victim was adult or child, the type and duration of the penalties, and whether they were effectively enforced or suspended.
 - Number of judgments in THB cases resulting in the confiscation of assets.
 - Number of convictions of legal entities for THB.