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

Fourth evaluation round

Thematic focus: Addressing vulnerabilities to trafficking in human beings

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Secretariat of the Council of Europe Convention  
on Action against Trafficking in Human Beings  
(GRETA and Committee of the Parties)  
Council of Europe  
F-67075 Strasbourg Cedex  
France

[trafficking@coe.int](mailto:trafficking@coe.int)  
[www.coe.int/trafficking](http://www.coe.int/trafficking)

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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 States Parties. The second evaluation round of the Convention examined the impact of legislative, policy and practical measures on the prevention of trafficking in human beings (THB), the protection of the rights of victims of trafficking, and the prosecution of traffickers, paying particular attention to measures taken to address new trends in human trafficking, in particular trafficking for the purpose of labour exploitation, and the vulnerability of children to trafficking. The third evaluation round focused on trafficking victims’ access to justice and effective remedies.

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

A number of provisions of the Convention establishing substantive and procedural obligations are relevant to this topic. The concept of “vulnerability” appears in Articles 4 (definitions), 5 (prevention of trafficking in human beings) and 12 (assistance to victims) of the Convention. According to paragraph 83 of the Explanatory report to the Convention, “by abuse of a position of vulnerability is meant abuse of any situation in which the person involved has no real and acceptable alternative to submitting to the abuse. The vulnerability may be of any kind, whether physical, psychological, emotional, family-related, social or economic. The situation might, for example, involve insecurity or illegality of the victim’s administrative status, economic dependence or fragile health. In short, the situation can be any state of hardship in which a human being is impelled to accept being exploited. Persons abusing such a situation flagrantly infringe human rights and violate human dignity and integrity, which no one can validly renounce.”

GRETA refers to the ICAT Issue Brief No. 12/2022 on Addressing vulnerability to trafficking in persons which refers to vulnerability as “those inherent, environmental or contextual factors that increase the susceptibility of an individual or group to being trafficked”. It classifies vulnerability factors in three categories: personal (e.g. age, gender, ethnicity, disability), situational (e.g. destitution, unemployment, legal status) and contextual (e.g. discriminatory laws, policies and social norms, armed conflicts, crises) factors, which interact and may increase the risk of human trafficking for certain individuals, groups and/or communities.<sup>2</sup> Vulnerability to human trafficking is also subject to intersectional factors, such as gender, belonging to a minority group and socio-economic status.

Applying a socio-ecological approach to the analysis of vulnerability to human trafficking demonstrates how different risk factors influence vulnerability, and how protective factors may reduce the risk of victimisation by increasing resilience.<sup>3</sup> The socio-ecological model considers the complex interplay between individual, relationship, community and societal factors. It helps to understand how anti-trafficking strategies should: (a) reduce the vulnerability of individuals, (b) work with the communities (which may also include relationships) concerned to ensure that their practices or current dynamics

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<sup>1</sup> [Paolo Campana, Online and Technology-Facilitated Trafficking in Human Beings, Council of Europe, April 2022.](#)

<sup>2</sup> [ICAT Issue Brief No. 12 on Addressing vulnerability to trafficking in persons - Search \(bing.com\)](#)

<sup>3</sup> [https://www.avoiceforcentraloregon.com/uploads/1/3/9/9/139904528/socio\\_ecological\\_model\\_and\\_trafficking.pdf](https://www.avoiceforcentraloregon.com/uploads/1/3/9/9/139904528/socio_ecological_model_and_trafficking.pdf)

do not exacerbate or contribute to vulnerabilities to human trafficking and, (c) change a number of system-driven or structural elements (such as policies) so that they do not facilitate but discourage an environment conducive to human trafficking.

In addition to the thematic focus on vulnerabilities to human trafficking, GRETA has decided that each State Party will receive country-specific follow-up questions related to recommendations not implemented or partially implemented after the third evaluation round.

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

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

## Part I – Addressing vulnerabilities to trafficking in human beings

### I. PREVENTION (Articles 5, 6 and 7)

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

The identification of factors contributing to vulnerability to human trafficking in Poland is primarily based on analysing current trends and the profile of identified victims, using data from the Police, Border Guard, National Prosecutor's Office, and the National Consulting and Intervention Centre for the Victims of Trafficking. The main and general factors that increase susceptibility to human trafficking include unemployment, economic hardships, and personal problems. A detailed analysis of the phenomenon, the actions taken, and current trends is presented annually in reports prepared by the Department for Public Order of the Ministry of the Interior and Administration (MSWiA). The department serves as the Secretariat of the Inter-Ministerial Team for Counteracting Human Trafficking and prepares annual reports on the implementation of the National Action Plan against Human Trafficking. Public access to these materials, available also in English, is granted through the official government website dedicated to combating human trafficking. The collected data identified key groups at heightened risk of becoming trafficking victims. These include job seekers and unemployed individuals, as well as young people finishing education and entering the labour market. Another significant group are refugees and migrants, especially women and children. Special attention is paid to foreigners working in Poland. According to the Ministry of Family, Labour, and Social Policy, by the end of August 2025, 1.25 million foreigners were legally employed in Poland; this group often lacks legal awareness and has limited knowledge of their rights and available support institutions. The Ministry also highlights migrating foreign children entering the Polish foster care system as a particularly vulnerable group, which is also applicable to Polish children in foster care. Meanwhile, the Office for Foreigners, after analysing cases in international protection proceedings, has identified two specific groups: young women from African countries such as Guinea, Cameroon, and Nigeria exploited in sexual labour, and men from Russia with visible disabilities who are forced into begging. The primary form of human trafficking in Poland involves forced labour or services. Victims are predominantly found in manufacturing, agriculture, construction, and seasonal work, though no particular geographic areas show elevated vulnerability.

Poland's national strategy addresses all identified risk groups and economic sectors. Its primary document, the National Action Plan against Human Trafficking, was most recently approved by the Council of Ministers for 2025-2027. This document sets the direction of the country's policy, outlining tasks for central institutions and local authorities based on current challenges and needs. Many of these tasks involve preventive measures directly aimed at at-risk groups. These include educational activities in educational institutions and labour market agencies, informational campaigns at the central and local levels, as well as workshops for people considering labour migration. Efforts to inform foreign communities have been intensified, with special focus on Ukrainian citizens. An important control activity involves joint inspections of employment legality conducted by Border Guard officers and inspectors from the State Labour Inspection.

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

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

At the legislative level, by the Act of January 13, 2025, amending the Code of Civil Procedure and certain other acts (Journal of Laws 2023, item 289), a crime corresponding to Article 37 of the Convention on preventing and combating violence against women and domestic violence (the so-called forced marriages) was introduced into the Penal Code:

Art. 191b. § 1. Whoever, by violence, unlawful threat, abuse of a dependent relationship, or exploitation of a critical situation, causes another person to enter into a marriage or a union equivalent to marriage within the religious or cultural circle of the perpetrator, shall be subject to imprisonment from 3 months to 5 years.

§ 2. The same penalty applies to anyone who, for the purpose of committing the crime specified in § 1, by deceit or abuse of a dependent relationship or exploitation of a critical situation, induces another person to leave the territory of the Republic of Poland.

In the context of protecting children from exploitation in prostitution and pornography, it is important to note that on February 15, 2024, new provisions of the *Act on Counteracting Sexual Crime Threats and Protecting Minors*<sup>4</sup> came into force. The act was amended by the Act of July 28, 2023, amending the Family and Guardianship Code and certain other acts<sup>5</sup>, the so called *Kamilka Act* regarding counteracting the threat of sexual crimes and the protection of minors. Since August 15, 2024, these new provisions have been fully enforced by control authorities, and organizations or companies may face penalties for non-compliance. These regulations apply to all institutions and organizations interacting with children, mandating compliance with child protection standards. They also extend to hotels—a key milestone in preventing child sexual exploitation.

It is also worth emphasizing that a special working group was established to develop the above-mentioned standards, led by the Deputy Minister of Justice and chaired by the Foundation Empowering Children Foundation—part of the Coalition of Non-Governmental Organizations monitoring the implementation of the Convention on the Rights of the Child in Poland.

Alongside the introduction of the new provisions, child protection standards templates for the tourism industry were developed and published on the websites of the Ministry of Justice and the Empowering Children Foundation ([standardy.fdds.pl](http://standardy.fdds.pl)), and distributed to key stakeholders, including the Ministry of Sports and Tourism, the Polish Chamber of Tourism, and the The Chamber of Commerce of the Polish Hotel Industry (IGHP).

The standards, which should be tailored to the nature and type of facility, define:

- 1) rules ensuring safe relations between minors and facility staff or organizers, especially concerning forbidden behaviours towards minors;
- 2) rules and procedures for intervention in the event of suspected abuse or information about abuse of a minor;
- 3) procedures and persons responsible for submitting notifications of suspected crimes against minors, notifying the guardianship court, and, in institutions authorized to do so, persons responsible for initiating the „Niebieska Karta” procedure;
- 4) rules for reviewing and updating the standards;

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<sup>4</sup> Consolidated text, Journal of Laws of 2024, item 1802.

<sup>5</sup> Act of 28 July 2023 amending the Family and Guardianship Code and certain other acts (Journal of Laws of 2023, item 1606).

- 5) the scope of competence of the person responsible for preparing the facility's or organizer's staff to apply the standards, the rules for preparing the staff to apply them, and the method of documenting this activity;
- 6) rules and methods for making the standards available to parents or legal guardians or factual caregivers and minors for familiarization and application;
- 7) individuals designated to receive reports of threats to minors and to offer necessary support;
- 8) the method of documenting and rules for storing disclosed or reported incidents or events threatening the welfare of the minor.

The standards introduced in a facility or place of business should also specify:

- 1) requirements for safe relationships among minors, especially prohibited behaviours;
- 2) rules for the use of electronic devices with internet access;
- 3) procedures for protecting children from harmful content and threats on the internet as well as in other forms;
- 4) principles for establishing a support plan for a minor after abuse has been disclosed.

The child protection standards must be published on the school's or facility's website and prominently displayed on the premises, both in the full version and in a condensed version designed for minors. The condensed version includes essential information tailored for minors.

When developing their own child protection standards, organizations should consider adding relevant areas beyond this document's scope, such as rules safeguarding a child's image and guidelines for supporting children with special needs, including disabilities.

Children and students, including those from Ukraine, can receive psychological and pedagogical support<sup>6</sup>, which is provided in kindergartens, schools, and educational institutions. This support involves identifying and meeting individual developmental and educational needs of the student, as well as recognizing the student's individual psychophysical capabilities and environmental factors affecting their functioning in the kindergarten, school, or institution. The objective is to support students' developmental growth and create conditions for their complete, engaged participation in kindergarten, school, institutions, and social settings.

The need to provide psychological and pedagogical support in kindergartens, schools, and institutions arises particularly from:

- 1) disability;
- 2) social maladjustment;
- 3) risk of social maladjustment;

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<sup>6</sup> Journal of Laws of 2023, item 1798.

- 4) behavioral or emotional disorders;
- 5) special talents;
- 6) specific learning difficulties;
- 7) deficits in competencies and language impairments;
- 8) chronic illness;
- 9) crisis or traumatic situations;
- 10) educational failures;
- 11) environmental neglect related to the student's and their family's living conditions, leisure activities, and social contacts;
- 12) adaptation difficulties related to cultural differences or changes in the educational environment, including previous education abroad.

The amendment to the Act of May 13, 2016, on *Counteracting Threats of Sexual Crime* (Journal of Laws 2024, item 1802) imposes an obligation on healthcare entities where minors are or may be present to implement child protection standards within six months of the Act's entry into force (by August 15, 2024). Such a document—in healthcare settings and beyond—outlines standards and procedures that promote awareness of protecting children from harm, define responsibilities and processes for child safety, and inform employees about relevant rules and available support when harm occurs. Under Ministry of Health directives, the National Centre for Counteracting Addiction provides training and awareness activities to prevent child violence. In 2024, it offered free 12-hour workshops for about 200 members of Interdisciplinary Teams and Diagnostic-Help Groups on child protection standards.

Children and students, starting in preschool and continuing in schools, are educated on child rights violations. They should act assertively in difficult social contexts, explaining their decision to distance themselves from or oppose behaviours they disapprove of. Kindergartens and schools nurture attitudes of proper responses to dangers threatening the freedom, life, and health of children and youth.

From the beginning of 2025/2026 school year, two new subjects have been introduced in schools: *civic education* and *health education*. Within *civic education*, students learn to recognize violations of human and civil rights, report these violations, and use other methods to protect these rights.

The *health education* subject supports health in all its aspects—physical, mental, social, sexual, and environmental—throughout every stage of life. Students learn how to promote a healthy lifestyle and respond to threats to life and health. They are taught to express and communicate their feelings, build healthy relationships, recognize forms of sexual violence including sexual harassment, and seek help or assert themselves against inappropriate behaviour by others. These classes address risks linked to various aspects of sexuality, such as online grooming, sexting, sexual blackmail (sextortion), pornography, sexualisation, and underage involvement in prostitution. They also cover counteracting these hazards and other health and psychosocial risks arising from various addictions (to drugs, alcohol etc.)

The Office for Foreigners, in cooperation with the Empowering Children Foundation, implemented the "Policy on protection of children from abuse in facilities for foreigners" in migrant centres. This

document was adopted within the project "We protect children in refugee centres – a comprehensive system to protect children from violence and abuse," co-financed by the National Asylum, Migration and Integration Fund Program and the state budget.

The policy, in effect since November 2016, imposes on all employees of the Office for Foreigners and cooperating entities the obligation to take actions ensuring the safety of foreign children and protection from harm. The document defines standards and procedures in this regard, including:

- raising awareness about children's rights and the consequences of harm,
- providing guidelines and tools for appropriate response in case of suspicion or confirmation of child abuse,
- preventive and educational actions aimed at parents and children regarding protection from violence and exploitation,
- intervention activities to promptly and adequately respond to potential threats.

An integral part of this policy is the handbook "We protect children in refugee centres – a comprehensive system to protect children from violence and abuse," containing practical guidance, tools, and information helpful in identifying and counteracting child abuse, as well as conducting legal, psychological, and intervention actions.

Employees and collaborators regularly participate in training on child protection, and centres provide educational materials (leaflets, brochures) and, when possible, conduct sessions for parents and children. Children are also informed about whom to contact for help if they experience violence or exploitation.

The Office for Foreigners also applies Procedure No. 7 in cases of (1) information about or possible conclusion of a marriage involving a minor, and (2) reports to the Department of Social Assistance seeking social aid for a marriage where one spouse is a minor and lacks official documents confirming the marriage. This procedure aims to monitor, prevent, and properly react to instances of minors entering into marriages or marriages reported in the refugee centres involving minors.

Furthermore, pursuant to Articles 200-211a of the Penal Code and the Police Act, actions are undertaken against crimes such as human trafficking, forced marriages, sexual exploitation, and illegal adoption. The Central Cybercrime Bureau continuously monitors the internet environment to identify advertisements and offers that may indicate such practices and to detect potential threats.

The Ombudsman for Children undertakes interventions in individual cases as well as numerous actions promoting child protection and children's rights. Additionally, the Office of the Ombudsman for Children has established a Digital Education and Online Safety Team to carry out specialized activities aimed at protecting children online. Among the individual interventions related to protecting minors from human trafficking are cases involving minor foreign nationals crossing the state border (including irregular crossings) who express a wish to seek international protection in Poland, cases concerning the detention of unaccompanied minor foreign nationals, cases of children from Ukraine with refugee experience, including children in Ukrainian foster care evacuated to Polish territory, and cases of unaccompanied minor foreigners placed in foster care.

Among the systemic activities of the Ombudsman for Children are:

- Cooperation with numerous non-governmental organizations;

- Participation in various national and international events;
  - Involvement in the working group tasked with drafting the act on counteracting and combating human trafficking, including presenting a position on the draft assumptions of this law;
  - General statements concerning combating the exploitation of children for begging;
  - Collaboration with the Ministry of the Interior and Administration regarding adapting the Catalogue of rights of human trafficking victims in the Polish legal system for minor recipients;
  - Operating the Ombudsman for Children's Trust Phone and Chat service directed to children and youth.
- b. developing children's life skills (including media literacy and online safety skills), knowledge and participation;

Such activities are carried out at both the central and local levels, based on the specific objective of the National Action Plan (KPD), namely raising awareness about the phenomenon of human trafficking. Members of the Voivodeship Teams for Counteracting Trafficking in Human Beings continuously perform tasks throughout the year aimed at promoting knowledge about human trafficking, including the distribution of educational and informational materials such as posters, comics, leaflets, brochures, and algorithms; as well as disseminating films about human trafficking for screening during activities with youth. Selected Voivodeship Teams for Counteracting Trafficking in Human Beings organize art contests targeted at children of various age groups. An example is the Podlaskie Voivodeship Team for Counteracting Human Trafficking, which, in cooperation with the Podlaskie Voivodeship Office in **Białystok**, organized a conference titled "Aware – Safe – Free" for final-year high school students in the Podlaskie region, related to the observance of the European Day Against Human Trafficking. The conference was combined with an award ceremony for contest winners, workshops for youth, and a field game (IOM).

In October 2025, the Ministry of the Interior and Administration (MSWiA) began implementing the task named *Development and Distribution of Informational Materials on Child Trafficking, including preparing informational and educational materials for use by teachers, students, as well as psychological and pedagogical staff of primary and secondary schools*. To this end, it initiated cooperation with the Ministry of National Education and the Education Development Centre subordinate to it.

Initiating and undertaking preventive actions to stop crimes and offenses as well as criminogenic phenomena, and cooperating in these areas with external partners, is one of the statutory tasks of the Police. The social engagement of Police activities and prevention work is reflected in Priority III, Task 6 of the Chief of Police for 2021-2025. According to reports from the General Police Headquarters for the period from 2021 to the first half of 2025, extensive preventive activities were carried out in two key areas:

- Safety of children and youth: a total of 5,293 preventive actions and 208,680 meetings were held, reaching 6,394,996 recipients.
- Human trafficking: during the same period, 2,439 preventive actions and 41,016 meetings reached 1,177,999 people.

Among many issues, the Police pay special attention to the safety of children and youth, especially concerning contacts with strangers and online environments. In the context of human trafficking prevention, efforts target not only children and youth but also adults, focusing on recognizing legitimate job offers (especially among job seekers) and preparing for safe travel.

To address vulnerability to human trafficking based on gender, actions are carried out in line with the European Union strategy for 2021-2025, the National Action Plan against Human Trafficking for 2025-2027 (NAP), and the priorities of the Chief of Police for 2021-2025 — with all Police actions focusing on the general nature of human trafficking, not only its gender-related aspect.

Key projects run by the Police include the project “Identification of Victims of Human Trafficking as a Basis for Receiving Support,” implemented between 2021-2023, and the informational and educational initiative “ESCAPETRUCK,” present in Poland since 2023.

1. The project “Identification of victims of human trafficking as the basis for obtaining support by the victim” (2021–2023)

Throughout the years 2021-2023 the the General Police Headquarters (KGP) Prevention Office together with the Criminal Office under the nationwide initiative financed by the Internal Security Fund organized project called *Identification of victims of human trafficking as the basis for obtaining support by the victim*. Its goal was to improve the effectiveness of early identification of human trafficking victims.

In July 2021, the Prevention Bureau prepared the competition documentation, selected experts, and consulted with foreign partners to apply for funding. The project aimed to enhance Police effectiveness in identifying trafficking victims and improve the skills of coordinators in early victim identification and societal outreach. Project beneficiaries included criminal Police officers and preventive Police officers engaged in preventing and combating human trafficking at regional and local levels, as well as individuals aged 16-45 traveling or intending to travel abroad for work.

Among the project activities, the following deserve mention: development of educational materials—a handbook on preventing and combating human trafficking (in electronic version) prepared in collaboration with representatives of the University of Warsaw’s Human Trafficking Research Center, dedicated to officers coordinating prevention and combating of human trafficking at regional and local levels; creation of an informational-educational brochure on human trafficking and victims’ rights; conducting 21 editions of specialized trainings/workshops for 756 criminal and preventive Police officers (topics included prostitution, pornography, and other forms of sexual exploitation in the context of human trafficking); development of a spot on preventing human trafficking and its airing on websites, social media of Police organizational units, in cinemas, and on nationwide television across the country.

Police units and partners received the video material with subtitles in four languages to use during prevention efforts.

The project culminated in an international conference in Warsaw in December 2022 presenting project outcomes and exchanging best practices with guests from the Netherlands, Romania, the UK, Italy, and FRONTEX. At the beginning of the year, the decision was made to continue the project in 2023. Due to the need for continuous improvement of tools and techniques both in preventing and combating human trafficking, as well as the necessity to strengthen cooperation with countries possessing experience and expert knowledge, the next stage of building partnerships involved study visits to countries with the greatest preventive and investigative experience (Spain, the Netherlands, Romania, and Italy). Delegations composed of individuals involved in project implementation

participated in the four planned visits. Additionally, as part of the project, partners from the Netherlands also visited Poland.

## 2. Information and educational activity using the ESCAPETRUCK.

The ESCAPETRUCK project has been implemented in Poland since 2023, using an innovative mobile space inside a specially equipped truck. This truck uses multimedia and simulations to demonstrate the mechanisms used by human trafficking perpetrators. The project focuses on building social resilience to trafficking risks, especially gender-related vulnerabilities such as sexual exploitation of women and girls and forced labour of men. Partners include the Dutch Police, Polish Police, Border Guard, University of Wrocław (Human Trafficking Research Centre), and since 2025, the Ministry of the Interior and Administration and the International Organization for Migration (IOM).

Activities have taken place in:

- October 23–28, 2023: Warsaw, Kraków, Wrocław (pilot project)
- May 17–29, 2024: Wrocław, Opole, Lubliniec, Katowice, Olkusz, Rzeszów, Stalowa Wola, Lublin, Chełm, Świdnik, Biała Podlaska
- October 7–18, 2024: Bielsk Podlaski, Grajewo, Olsztyn, Elbląg, Gdańsk, Koszalin, Szczecin, Oborniki, Słupca, Poznań
- May 8–23, 2025: Praszka, Piekary Śląskie, Gliwice, Mysłowice, Pszczyna, Jaworzno, Wodzisław, Żory, Żywiec, Sucha Beskidzka, Myślenice, Bochnia, Tarnów, Końskie, Radom, Łódź

A next edition took place from October 13–28, 2025, covering five provinces (Mazowieckie, Kujawsko-Pomorskie, Pomorskie, Zachodniopomorskie, Lubuskie), with events in Płock, Włocławek, Toruń, Bydgoszcz (linked to the European Day Against Human Trafficking), Koszalin Border Guard School, Police School in Słupsk, Kołobrzeg, Drawsko Pomorskie, Police, and Zielona Góra.

## 3. Current and local activities

In addition to the nationwide and international initiatives mentioned above, the Police also implement numerous preventive initiatives at the local level. These activities are organized in collaboration with schools, local governments, non-governmental organizations, and the local community. This collaboration also includes cooperation with District Employment Offices and other institutions to combat human trafficking. Furthermore, during their daily duties, Police officers conduct preventive interviews, provide information about threats, and take steps to identify potential cases of human trafficking early.

In addition, the Ministry of Justice has prepared guidelines to facilitate the development of child online protection standards for schools or institutions. These detailed guidelines expand upon the general guidelines for child protection standards. These guidelines provide advice on how to describe:

- the types of threats associated with the Internet and new technologies,
- additional rules for intervention in the event of such incidents,
- the role and responsibilities of the online safety coordinator,
- network and device security,

- educational activities related to online safety.

Types of threats on the Internet, for example, prohibited behaviors among children; access to illegal content; sexual violence involving the use of a child's image (making videos and photos with naked children or children during sexual activity — especially when involving violence, threats, or deceit); distribution of such materials; creation of such materials using artificial intelligence (*deepfake*).

The standard should outline the competencies and responsibilities of the network safety coordinator, who is tasked with the technical and organizational preparation of the school or institution to ensure safe conditions for children's use of teleinformatics networks, including the Internet, within the institution's premises.

The network safety coordinator is appointed by the head of the institution. More detailed information about the standards for child protection on the Internet is available according to the DIR's competence on the Ministry of Justice's website, link: <https://www.gov.pl/web/sprawiedliwosc/wytyczne-do-standardow-ochrony-dzieci---ochrona-dziecka-w-internecie>.

Orientation courses in Office for Foreigners centers support foreigners seeking international protection. Orientation courses are conducted for two age groups, i.e., children and adults, in languages understandable to foreigners, mainly in English and Russian. The courses include in-depth discussions on topics that facilitate effective integration of participants into Polish society and address potential challenges after arrival. The content is adapted to the needs of each group. For children, lessons cover Polish traditions and customs, education, sports, literature, music, children's films and cartoons, as well as basic hygiene rules, including those related to epidemic conditions. These courses are organized in centres for foreigners.

Students in schools learn fundamental methods of protecting their personal data, understand various forms of personal rights violations—especially online—and are taught how to report such violations.

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

As a result of the Act of 28 July 2023 amending the Civil Procedure Code and certain other laws (Journal of Laws 2023, item 1606), standards for the protection of minors have been introduced into the Polish legal system, specifically into the Act of 13 May 2016 on Counteracting Threats of Sexual Crime and the Protection of Minors (hereinafter: the Act on the Protection of Minors). These standards contain rules or guidelines aimed at ensuring safe conditions for protecting minors from harm and specify how to act in cases of suspected harm or when information about such incidents is received. Within these standards, an internal procedure for accepting reports—such as those from children—must also be developed.

According to Article 22b of the Act on the Protection of Minors, the obligation to introduce standards for the protection of minors applies to:

- 1) Every authority managing an educational unit as defined in Article 2 points 1–8 of the Act of 14 December 2016 – the Education Law (Journal of Laws 2024, items 737, 854, 1562, and 1635), as well as any other educational, care, upbringing, rehabilitation, religious, artistic, medical, recreational, sports, or interest-based facility that minors attend, stay at, or may stay at.
- 2) Every organizer of educational, care, upbringing, rehabilitation, religious, artistic, medical, recreational, sports, or interest-based activities for minors.

According to Article 22c paragraph 1 of the Act on the Protection of Minors, standards must specify, in a manner adapted to the nature and type of the facility or activity:

- 1) rules ensuring safe relationships between minors and staff, including prohibited behaviours toward minors;
- 2) rules and procedures for intervention in cases of suspected harm or when information about harm to a minor is received;
- 3) procedures and responsible persons for reporting suspected crimes against minors, notifying the guardianship court, and, for institutions with such authority, those responsible for initiating the "Blue Card" procedure.
- 4) rules for reviewing and updating standards;
- 5) the scope of responsibilities of the person responsible for preparing staff to apply standards, rules for staff training, and documentation of this process.;
- 6) rules and methods for making standards accessible to parents, legal guardians or actual caregivers, and minors for familiarization and application;
- 7) persons responsible for receiving reports about incidents threatening minors and providing them with support;
- 8) methods for documenting and rules for storing disclosed or reported incidents or events threatening the well-being of minors.

According to Article 22c paragraph 2 of the Act on the Protection of Minors, the standards introduced in facilities or places where activities are conducted, as mentioned in Article 22b, must also specify:

- 1) requirements regarding safe relationships between minors, including prohibited behaviours;
- 2) rules for using electronic devices with access to the Internet;
- 3) procedures for protecting children from harmful content and threats on the Internet, as well as from harmful material in other forms;
- 4) rules for establishing a support plan for a minor after harm has been disclosed.

Entities providing hotel and tourism services, as well as those operating other collective accommodation facilities, are also required to introduce standards necessary for ensuring the protection of minors. These standards adapted to the nature and type of services provided, must specify in particular (Article 22c paragraph 3 of the Act):

- 1) rules ensuring safe relations between staff and minors, including prohibited behaviours toward minors;
- 2) rules and procedures for identifying minors staying at the hotel and their relationship with the adult accompanying them;
- 3) rules and procedures for responding in cases of justified suspicion that the well-being of a minor staying at the hotel or using tourism services is at risk;
- 4) procedures and responsible persons for reporting suspected crimes against minors and notifying the guardianship court;

- 5) the scope of responsibilities of the person responsible for preparing staff to apply standards, rules for staff training, and documentation of this process.

Standards must take into account the situation of children with disabilities and children with special educational needs. They should be prepared with the requirement that the content is understandable to minors (Article 22c paragraphs 4 and 5 of the Act on the Protection of Minors).

Entities required to have standards (Article 22c paragraphs 6 and 7):

- Must review the standards at least once every two years to ensure they are adapted to current needs and comply with applicable regulations. The conclusions of the review must be documented in writing.
- Must publish the standards on their website and display them in a visible place at their premises, both in full and in a shortened version intended for minors. The shortened version contains information essential for minors.

Regarding foreign children, the Office for Foreigners maintains ongoing cooperation with the Police and Border Guard, responding promptly to any threats to the safety of foreigners, including children. In centres for foreigners, 24-hour protection is provided by specialized security companies or by the entities running the centres.

Article 68 of the Act on Providing Protection to Foreigners on the Territory of the Republic of Poland includes victims of human trafficking as persons requiring special treatment in the area of social assistance. The procedure for handling such cases, once identified, is described in the Department of Social Assistance Procedure No. 13 for handling foreigners requiring special treatment in the area of social assistance and organizing medical care, including cooperation with non-governmental organizations and other competent authorities.

Since March 2008, the Office for Foreigners has been a party to the agreement on standard procedures for preventing and responding to cases of sexual violence and gender-based violence against foreigners in reception centres. Other parties to this agreement include the National Police Commander, UNHCR, the "La Strada" Foundation, and the Halina Nieć Legal Aid Center. Under the Agreement, Local Cooperation Teams (LZW) have been established, consisting of representatives from the Office for Foreigners, the Police, and non-governmental organizations. These teams also cooperate with medical staff, centre administrators, and representatives of refugee communities.

The tasks of Local Cooperation Teams (LZW) cover three main areas:

- Prevention - Monitoring safety conditions, presence of Police patrols, immediate response to potential threats, and conducting informational and educational activities for foreigners.
- Identification - Documenting and analysing cases of violence, as well as exchanging information among team members.
- Response - Taking action to protect victims (for example, transferring them to another center, providing medical, psychological, and legal assistance, and supporting the initiation of criminal proceedings).

This system ensures a consistent, multi-level mechanism in reception centers for preventing, detecting, and responding to abuse against children and adults, significantly enhancing their safety

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

Trainings on child rights protection, human rights, and prevention of all potential threats, aimed at teachers and school and institution directors, are provided by the Centre for Education Development operated by the Minister of Education, along with professional development centres. The goal of these trainings is to enhance staff competencies in safety, child protection, and the promotion of civic attitudes

It is worth noting that in October 2025, a meeting took place between representatives of the Ministry of National Education and the Centre for Education Development with representatives of the Ministry of the Interior and Administration. The meeting aimed to initiate cooperation on implementing Task KPD point 2 II. 2 of the National Action Plan Against Human Trafficking 2025-2027, titled *Development and distribution of informational materials on child trafficking, including preparing educational and informational materials for use by teachers, students, as well as psychological and pedagogical staff in primary and secondary schools*.

In 2025, the Department for Public Order of the Ministry of the Interior and Administration, in collaboration with the La Strada Foundation, Empower the Children Foundation, Save the Children Foundation, and ITAKA Foundation, with support from the Ministry of Family, Labour and Social Policy and the Mazovian Voivodeship Office, developed a *Guide for foster care staff about threats related to human trafficking and the risk of this crime among wards*. This publication targets minors in foster care institutions—particularly foreign minors and teenagers nearing adulthood who will soon exit institutional care—groups especially vulnerable to human trafficking risks. The guide aims to equip foster care staff with practical knowledge and tools essential for prevention, early identification, and effective response to trafficking threats among their wards. It has been distributed to care and educational institutions across all powiats.

Save the Children Poland, in collaboration with the Ministry of Family, Labour and Social Policy, prepared a practical guide titled *Guide for Caregivers, Educators, and Foster Care Staff Working with Foreign Children under International Protection Procedures*. This resource provides essential information on human trafficking risks and victim identification techniques for staff supporting vulnerable migrant children.

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

The education system provides care and education to children and students arriving from abroad, especially refugees from Ukraine, under the same conditions as Polish citizens. To support Ukrainian students, the Ministry of National Education launched a special section for Ukrainian citizens, including parents, children, and students, available at <https://www.gov.pl/web/edukacja/szkola-dla-was>.

Between 2022 and 2024, material aid of a social nature was available to Ukrainian students referred to in Article 53, paragraph 1 of the Act on *Assistance to Ukrainian Citizens in Connection with the Armed Conflict on the Territory of that Country*. This aid took the form of a school scholarship (up to 248 PLN monthly per student) and a school allowance (up to 620 PLN per student whose family experienced an event significantly worsening their material situation).

The minister responsible for education and upbringing implemented and continues to implement this aid within the financial plan of the Assistance Fund mentioned in Article 14, paragraph 1 of the aforementioned Act.

Details on the provided help can be found in the table below.

Value of funds paid out (in thousands PLN)	Number of students supported by semesters	Value of funds paid out (in thousands PLN)	Number of students receiving support by year
The total value of scholarships and allowances paid in 2022 amounts to 8 million PLN	6 784 (from March to August)  7 742 (from September to December)	The total value of scholarships and allowances paid in 2022 amounts to 8 million PLN	3 309
7 798 thousands PLN	5 597 (from March to August)  4 661 (from September to December)	43,2 thousands PLN	80
5 258 thousands PLN	3 768 (from March to August)  3 039 (from September to December)	26,2 thousands PLN	90

In 2025, 8 million PLN is planned for the implementation of the above support.

According to the provisions of the Act of August 27, 2004, on healthcare services financed from public funds (Dz. U. 2024, item 146, as amended), at-risk children, including minority groups, unaccompanied migrant children, and children of migrant workers, have access to healthcare under the following conditions:

1. As insured persons (mandatory or voluntary), children are covered by health insurance in Poland if they are:
  - Polish citizens, another EU/EFTA Member State or the United Kingdom citizens, if they reside in the territory of the EU/EFTA;
  - persons who do not hold citizenship of an EU/EFTA Member State or the United Kingdom and who stay in the territory of Poland on the basis of a visa for the purpose of performing work, a temporary residence permit, including a temporary residence permit for victims of human trafficking, a permanent residence permit, a long-term EU resident's residence permit, a residence permit for humanitarian reasons, a permit for tolerated stay, a visa issued for the

purpose of arrival for humanitarian reasons, due to the interest of the state or international obligations,

- foreigners granted refugee status, subsidiary protection, or temporary protection in Poland, as well as those applying for international protection in Poland and their spouses applying on their behalf;
- non-EU/EFTA or UK citizens legally residing in another EU/EFTA or UK member state, provided they have a title to mandatory health insurance listed in Article 66 of the Act.

Children up to 18 years old are mandatorily insured in particular if they:

- Are students per education system regulations;
- Reside in institutions performing rehabilitation, educational, or care functions or social welfare homes;
- Are children before starting compulsory schooling who do not reside in the above institutions;
- Have refugee or subsidiary protection status in Poland and participate in an individual integration program under social assistance laws;
- Are homeless persons exiting homelessness – homeless person emerging from homelessness is defined by law as a person without permanent residence who is actively seeking to return to a stable life through an individual homelessness exit program. This program, developed with the assistance of a social worker, includes support in resolving life, family, housing, and employment issues, and aims to achieve full integration and independence. The individual is not subject to mandatory health insurance for any other reason.

2. As family members of an insured person, provided that they:

- Are not themselves subject to mandatory health insurance;
- Are not eligible for healthcare under coordination regulations;
- For children who are family members of EU/EFTA or UK citizens, have residence in one of those states;
- in the case of children who are family members of persons who do not have the citizenship of an EU/EFTA Member State or the United Kingdom – if they reside in the territory of Poland [Articles 2 and 3 of the Act on Healthcare Services Financed from Public Funds]. It should also be noted that, in accordance with Article 5, point 3 of the Act on Healthcare Services Financed from Public Funds, a child has the status of a family member of a person covered by insurance if – in relation to the person covered by health insurance registering them for insurance – they are their own child, spouse's child, adopted child, grandchild or other child for whom care has been established, or a child within a foster family or family children's home, until they reach the age of 18, and if they continue their education at school or are undergoing education at a university or doctoral school – until they reach the age of 26, and if they have a certificate of significant disability or other conditions treated equally – there is no age limit.

3. Beneficiaries referred to in Article 2(1)(3) of the Act on Healthcare Services Financed from Public Funds while in Poland, if they:
  - hold Polish citizenship regardless of their residence;
  - do not hold Polish citizenship and have been granted refugee status, subsidiary protection or a temporary residence permit for the purpose of family reunification in Poland (granted in connection with the circumstance referred to in Article 159, paragraph 1, point 1, letter c or d of the Act of 12 December 2013 on Foreigners), provided that they have a place of residence in Poland, or
  - receive a survivor's pension or a cash benefit referred to in the Act of 8 February 2023 on cash benefits for family members of officers or professional soldiers whose death occurred in connection with service or while performing activities outside the service to save human life, health or property, if they reside in the territory of an EU/EFTA Member State or the United Kingdom.
4. Persons without entitlement to healthcare under the Act on Healthcare Services Financed from Public Funds but who, according to Article 12 of that Act, have the right to services regulated in specific acts and provided free regardless of insurance rights. This applies to healthcare governed by:
  - Article 21(3) of the *Act on Sobriety and Counteracting Alcoholism* (Dz. U. 2023, item 2151);
  - Article 26(5) of the *Act on Counteracting Drug Addiction* (Dz. U. 2023, item 1939);
  - Article 10 of the *Mental Health Protection Act* (Dz. U. 2024, item 917);
  - Articles 400a(1) and 415(1)(5) of the *Foreigners Act* (Dz. U. 2025, item 1079);
  - Provisions of the *Act on Combating Infectious Diseases in Humans* (Dz. U. 2024, item 924, as amended);
  - The Act on *State Medical Rescue* (Dz. U. 2025, item 91);
  - Article 6(1)(5) of the *Act on the Pole's Card* (Dz. U. 2023, item 192, as amended);
  - Article 17d of the *Repatriation Act* (Dz. U. 2022, item 1105, as amended);
  - Article 37 of the *Act on Assistance to Ukrainian Citizens related to the Armed Conflict* (Dz. U. 2025, item 337, as amended).

Healthcare for uninsured persons under these laws is financed from the state budget by the ministries responsible for health and internal affairs. According to Article 6(1)(5) of the Pole's Card Act, holders of a valid Pole's Card are entitled to emergency healthcare in Poland as defined in the healthcare services act. Persons repatriated to Polish citizenship may access healthcare on such terms for up to 90 days after crossing the Polish border.

However, Ukrainian citizens who are staying in Poland legally, i.e. who arrived legally on the territory of Poland in the period from 24 February 2022 in connection with military operations conducted on the territory of that country, and declare their intention to stay in the country, in accordance with Article 37 of the Act on Assistance to Citizens of Ukraine in Connection with the Armed Conflict on

the Territory of that country, had the right to medical care on the same terms and to practically the same extent until 30 September 2025 (excluding only spa treatment and spa rehabilitation, as well as the administration of medicinal products issued to beneficiaries under the health policy programs of the Minister of Health).

As of September 30, 2025, as a result of amendments introduced to Article 37 of the Act on *Assistance to Citizens of Ukraine in Connection with the Armed Conflict in the Territory of that State* by the Act of September 12, 2025, on *Amending Certain Acts to Verify the Right to Family Benefits for Foreigners and on the Conditions of Assistance to Citizens of Ukraine in Connection with the Armed Conflict in the Territory of that State* (Journal of Laws of 2025, item 1301), these individuals retain the right to healthcare services provided under the same terms and conditions as those applicable to persons covered by mandatory and voluntary health insurance, excluding the following services:

- 1) spa treatment and spa rehabilitation;
- 2) administration of medicinal products issued to beneficiaries under the health policy programs of the Minister responsible for health;
- 3) health programs;
- 4) medical rehabilitation;
- 5) dental treatment;
- 6) drug programs;
- 7) emergency access to drug technologies;
- 8) healthcare services involving the transplantation or use of human cells, including hematopoietic cells from bone marrow, peripheral blood, and umbilical cord blood, tissues, and organs from living donors or cadavers, as referred to in the Act of July 1, 2005, on *the Collection, Storage, and Transplantation of Cells, Tissues, and Organs* (Journal of Laws of 2023, item 1185);
- 9) endoprosthetic and cataract surgery;
- 10) medicines, foodstuffs for particular nutritional uses, and medical devices available in pharmacies on prescription, reimbursed under the Act of May 12, 2011, on the *Reimbursement of Medicines, Foodstuffs for Particular Nutritional Uses, and Medical Devices* (Journal of Laws of 2025, item 907, as amended), hereinafter referred to as the "Reimbursement Act";
- 11) the supply of medical devices, ordered by an authorized person, and their repairs, as referred to in the Reimbursement Act.

This means that from September 30, 2025, the indicated Ukrainian citizens continue to have the right to receive healthcare services not listed in Article 37, paragraph 1, points 1-11 of the *Assistance Act*, which are provided as part of primary healthcare, outpatient specialist care, or hospital treatment under the same terms and conditions that applied to them until September 30 of this year. However, after September 29 of this year, these individuals are no longer entitled to receive healthcare services included in the calculation contained in Article 37, paragraph 1, points 1-11 of the *Assistance Act*.

It should be noted that these provisions apply to all adult Ukrainian citizens who legally entered Poland from Ukraine after February 23, 2022, in connection with the military operations conducted in Ukraine and declared their intention to remain in Poland. Exceptions in this regard are provided for in Article 25 of the Act amending certain acts to verify the entitlement to family benefits for foreigners and on the conditions for providing assistance to Ukrainian citizens in connection with the armed conflict in the territory of that country. This provision states that if a Ukrainian citizen began treatment before September 30 of this year, as part of which they receive the healthcare services listed in Article 37, paragraph 1, items 3-9 of the Act on Assistance, they are entitled to these services until their provision ceases.

However, Ukrainian citizens under 18 years of age are also entitled to the healthcare services listed in Article 37, paragraph 1, items 3-9 of the Act on *Assistance to Ukrainian Citizens in Connection with the Armed Conflict in the Territory of that Country*. Additionally, if the patient has turned 18 during the provision of healthcare services indicated in points 3-9, the provision of these services will continue until the end of treatment.

The right to treatment in Poland under the terms described above is granted not only to Ukrainian citizens, but also to children born in Poland to mothers whose stay in Poland is considered legal (i.e., the mother meets the above-mentioned conditions), provided they are not Polish citizens or citizens of other EU/EFTA member states or the United Kingdom – during the period applicable to the mother. The right to medical care in Poland is also granted to a non-Ukrainian spouse of a Ukrainian citizen, a minor child of a Ukrainian citizen, or a minor child of the spouse of a Ukrainian citizen, if they arrived in Poland in connection with military operations conducted in the territory of Ukraine after February 23, 2022 and have declared their intention to remain in Poland.

Regarding children applying for international protection in Poland — under the *Education Law* of December 14, 2016 — they have the right to education and care in public kindergartens, public primary schools, and secondary schools on the same terms as Polish citizens up to 18 years of age or completion of secondary school.

Fulfilling obligations under the Act on providing protection to foreigners in Poland, the Head of the Office for Foreigners ensures that minor foreigners attending public schools and educational institutions receive educational aids in the form of school starter kits (either in kind or as vouchers). Additionally, secondary school students and children undergoing compulsory preschool preparation receive school textbooks. The Office also provides opportunities to learn Polish and basic materials for this purpose. If possible, the Office covers the costs of extracurricular and recreational-sport activities for children.

The Office for Foreigners continuously provides language learning and basic Polish language materials to foreigners under its care. Foreigners applying for international protection in Poland may participate in classes held in foreigner centres or in Warsaw. These classes can also be conducted remotely. The Polish language teaching for children involves help with homework and remedial classes. The teacher remains in contact with the schools the children attend, allowing for exchange of information about progress and learning difficulties, enabling adjustment of classes to their needs.

Children starting compulsory schooling in Poland follow a Polish language curriculum and model teaching solutions. The curriculum takes into account the specific communicative needs of children applying for international protection in Poland. It includes acquisition of basic skills such as introducing oneself and one's family, as well as simulated communication situations at school. It emphasizes acquiring and consolidating knowledge on basic communication at a Polish school and the rules prevailing there.

Children applying for international protection and under care by the Social Assistance Department are enrolled in schools upon arrival at the centre. Their parents are supported by center staff, who provide information about nearby schools and school attendance regulations, assist in filling out forms and compiling documentation, and, when necessary, help during the first school visit. Staff of individual centres maintain constant contact with school staff. As part of parental involvement in school life, foreigners receive information at reception centres about proper conduct rules in schools.

In foreigner centres, children aged 3 to 6 can participate in educational-adaptive classes run by qualified and experienced teachers. These classes are conducted in accordance with *Policy on protection of children from abuse*. The classes are aimed at engaging children aged 3-6 in joint activities and play, creating a friendly atmosphere and a sense of security. They target educational, motor, and emotional development of children and also form the basis for starting compulsory schooling.

During classes, educational talks on children's rights and protection against violence and exploitation are conducted according to the *Policy on protection of children from abuse* introduced in the foreigner centres. The classes aim to engage children aged 3-6 in joint activities and play, as well as to create a friendly atmosphere and a sense of security. They are focused on the educational, motor, and emotional development of children, while also forming the foundation for children to begin their compulsory schooling.

During the classes, educational talks are conducted on children's rights and protection against violence and abuse in accordance with the Policy for the Protection of Children from Abuse, introduced in centres for foreigners.

Moreover, educational activities dedicated to children are conducted only by persons not listed in the Registry of Sexual Offenders with limited access.

The scope of medical care granted to foreigners applying for international protection corresponds to the scope of medical care provided to insured Polish citizens, excluding spa treatment and spa rehabilitation.

Medical care is provided at medical points in all foreigner centres and the Foreigner Service Team at the Office for Foreigners headquarters at ul. Taborowa 16 in Warsaw. Each point employs a doctor, nurse, and psychologist who provide basic medical care as well as referrals for specialist examinations.

Medical care for foreigners living far from centres is provided through facilities in provincial cities. Appointments and coordination of doctor's visits are handled through a medical operator hotline, where the foreigner receives information about the date, place of the appointment, and prescription fulfilment method.

Psychological care for foreigners applying for international protection in the territory of the Republic of Poland is provided through psychologists' on-call services at the Centres for Foreigners and the Foreigners' Service Centre. The psychologists' services, including psychological support, educational activities, cognitive-behavioural psychotherapy, and crisis interventions, are based on the current *Standards for Refugee Diagnosis of the Polish Psychological Association*. If the psychological assessment indicates the need for specialized treatment, patients are referred to mental health clinics for adults or children and adolescents, respectively. An individualized approach and close collaboration between psychologists and medical staff allow for comprehensive psychological care for every foreigner in need.

Additionally, in cases deemed exceptional by the Office for Foreigners, the medical provider provides psychological consultations for children and adolescents. The need for a child to receive immediate psychological consultation at the Center for Foreigners appropriate for the child's location should be reported by phone by an employee of that center. The consultation date cannot be longer than two business days (i.e., Monday through Friday, excluding public holidays) from the date of notification.

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

Birth registration in Poland is regulated by the Act of November 28, 2014, on *Civil Status Records* (Journal of Laws 2025, item 594).

The birth of a child must be reported within 21 days from the date the birth certificate is issued, and in the case of a stillborn child—within 3 days from the date the stillbirth card is issued. If the birth is not reported within the deadline, the head of the civil registry office registers the birth ex officio.

Birth registration can be done in person at the registry office or electronically. The head of the Civil Registry Office registers the child's birth, records the residence registration, and provides the child's PESEL number (personal identification number) to the parents or legal guardians.

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

The Border Guard employs a set of legal, procedural, educational, and other mechanisms aimed at providing potential victims of human trafficking with assistance and support, taking into account the special needs of, among others, women. When carrying out duties involving potential victims of human trafficking, the recommendations contained in extra-code regulations are followed, namely the *Algorithm of Conduct of Law Enforcement Officers in Case of Revealing a Crime of THB* and the *Algorithm for Identifying and Dealing with a Minor Victim of Human Trafficking for the Police and Border Guard officers*. These algorithms constitute a uniform model of response toward potential victims of human trafficking, regardless of their gender. The provisions emphasize that actions toward victims should be conducted with particular sensitivity, respect, and empathy, respecting the rights of the victim and avoiding the risk of secondary victimization, which can be especially significant for victims — particularly women — who may have experienced trauma.

To identify particularly vulnerable persons (including those vulnerable due to their gender), the Border Guard conducts numerous specialist training sessions on human trafficking victim identification. Furthermore, the Border Guard participates in many campaigns and prevention-education events aimed at raising awareness of human trafficking threats. These activities are carried out within the framework of the National Action Plan against Human Trafficking and are reported annually to the Ministry of the Interior and Administration.

People preparing to leave prisons constitute a specific risk group. They find themselves in a situation often associated with economic hardship and barriers to social reintegration. This situation particularly affects women, whose position in the labour market and society can be more difficult, making them easy targets for criminal groups specializing in the recruitment and exploitation of individuals. Recognizing this interdependence, the new National Action Plan against Human Trafficking for 2025-2027 includes for the first time Action V.20, entitled "Training for prison staff on the phenomenon of human trafficking," implemented by the Ministry of Justice in cooperation with non-governmental organizations.

It is worth noting that the Czas Wolności Foundation has been systematically conducting specialized training in prisons for several years, aimed directly at female inmates. These educational activities aim to raise female inmates' awareness of human trafficking, identify exploitation mechanisms, and provide available forms of assistance and support. For example, in 2024, the Foundation organized

22 training sessions, attended by a total of 408 participants. This initiative is particularly important given that women often find themselves in difficult life situations, including economic ones, after serving their prison sentences, and become a group particularly vulnerable to exploitation. During the training sessions, 20% of participants reported being recruited into human trafficking, and some were recruited and exploited in various areas. Thanks to these training sessions, inmates gain knowledge about the mechanisms characteristic of human trafficking. During these activities, several inmates recognized that they were currently being exploited or, upon release, would return to professional or personal relationships in which they were victims of this crime. A conference on this crime was held in one of the prison facilities, with the participation of individuals working in the anti-trafficking system, as well as management staff from uniformed services and civilian employees from public administration. The inmates, along with representatives of the foundation, prepared a theatre forum dedicated to recognizing the phenomenon and identifying victims of human trafficking.

4. What specific measures are taken to reduce the vulnerability to trafficking of persons from disadvantaged minorities? Please provide information on policies and measures in the following areas:
- a. research;
  - b. information, awareness-raising and education campaigns;
  - c. socio-economic initiatives targeting underlying and structural causes;
  - d. education, vocational training and job placement programmes.

In response to the above points, with respect to disadvantaged minorities, the only national/ethnic minority group at risk of human trafficking is the Roma ethnic minority. The scale of human trafficking in this group remains under-recognized due to the insularity of this environment. The main challenge in the context of human trafficking in the Roma community is changing cultural patterns, improving education levels, and achieving economic independence, particularly for Roma women through improved education and entering the labour market. Therefore, the *Roma Social and Civic Integration Program* in Poland for 2021-2030 identifies Roma women and girls as a special support group to which awareness-raising activities can be directed. Furthermore, the aforementioned program plans to incorporate human trafficking into training for Roma education assistants working in schools.

Regarding foreigners, the Office for Foreigners conducts informational activities aimed at familiarizing persons seeking international protection in Poland with both the phenomenon of human trafficking and the system of victim support. These activities are delivered through information available in the Refugeebook application. In foreigners' centres, educational materials (leaflets, brochures, posters) regarding protection of children against abuse and information on whom to contact for help in cases of violence are also provided.

Regarding educational programs, the core curriculum, as the foundation of the educational system and the basis for curriculum development, contains specific content and specific skills for shaping appropriate student attitudes, curricula, and other educational programs. Training and publications are also organized for teachers, school principals, and parents.

5. What specific measures are taken to reduce the vulnerability to THB of persons with disabilities? Please provide information in the following areas:
- a. deinstitutionalisation, including community and family-based services for children and support for independent living;

The Ministry of Family, Labour and Social Policy undertakes a range of actions contributing to the deinstitutionalization process, both through amendments to regulations (e.g., new forms of support

within the social assistance system such as neighbourhood services and short-term support, new regulations concerning training and assisted living apartments) and through programs supporting municipalities in task implementation (the "Care 75+" Program, the "Senior Support Corps," the "From Dependency to Independence" Program, the development program for family care homes, and "Overcoming Homelessness. Assistance Program for Homeless Persons"). It should be emphasized, however, that the purpose of social assistance is to enable individuals and families to overcome difficult life situations that they cannot manage on their own by utilizing their rights, resources, and capabilities. Therefore, the initiatives aim to develop support networks for those in need, enabling them to function as long as possible in their environment. The direct goal of these activities is not to reduce the vulnerability of persons with disabilities to human trafficking.

Currently, the Ministry of Family, Labour and Social Policy is preparing to implement a project titled "Deinstitutionalization of Ukrainian and Polish foster care," which will commence at the beginning of 2026. The project will be executed within the framework of promoting social integration of persons threatened by poverty or social exclusion, including the most vulnerable individuals and children.

The Ministry of Family, Labour and Social Policy is currently preparing to implement a project titled "Deinstitutionalization of Ukrainian and Polish Foster Care," which will begin in early 2026. The project will be implemented to promote the social integration of individuals at risk of poverty or social exclusion, including the most vulnerable and children.

The project envisions a transition from an institutional care model to more intimate forms of care, similar to the family model of care for children in Ukrainian foster care. The project will involve the dismantling of large group housing centres and the relocation of children to small homes, allowing for the closure of group housing centres, increasing independence, and socializing the foster children. This initiative involves continuing to finance existing homes and renting new facilities. Furthermore, the project plans to strengthen the support system for foster families accepting children with special needs by establishing 16 Foster Family Support Centres. This will strengthen and supplement the existing support centres for foster families and their children with special needs.

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

People with disabilities can receive support in various forms under social assistance, including temporary shelter in a homeless shelter or a homeless shelter with care services, care services provided at home, in support centres and family care homes, support in a training or assisted living facility, and stay and services in a social welfare home. According to Article 22 point 8 of the Act of March 12, 2004, on social assistance (Journal of Laws 2025, items 1214 and 1302), it is the voivode's responsibility to supervise the implementation of tasks by municipal, county, and Voivodeship governments, including the quality of activities of social assistance organizational units and service quality standards set by the minister responsible for social security, as well as compliance with employment qualifications for social assistance workers. The voivode also controls service quality and employment qualification compliance performed by non-public entities based on agreements with government and local administration bodies, as well as social welfare homes operated by non-public entities not commissioned by local government authorities. Furthermore, the voivode oversees facilities providing round-the-clock care for persons with disabilities, the chronically ill or elderly persons, including those operated under business law provisions, ensuring compliance with social and living standards and respect for the rights of those persons, as well as employment qualification compliance.

It should be emphasized that the above-mentioned social assistance services do not constitute forms of accommodation for persons with disabilities but serve to meet other needs as specified by law in each case.

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

There is no information in this regard.

- d. access to adequate accommodation, education and work;

There is no information in this regard.

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

In this section, the regulations that apply to all injured parties, while taking into account the needs of people with disabilities, are indicated.

a) Regulation of the Minister of Justice of November 7, 2024, on specifying the templates of written instructions regarding the rights and duties of suspects, victims, and witnesses (Journal of Laws 2024, item 1658)

- <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20240001658>

b) Regulation of the Minister of Justice of November 7, 2024, on specifying the templates of written explanations for suspects, victims, and witnesses regarding the scope of their rights and duties and the manner and conditions of interrogation (Journal of Laws 2024, item 1659)

- <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20240001659>

c) Regulation of the Minister of Justice of September 22, 2024, on how to prepare and conduct interrogations under the procedure specified in Articles 185a-185c and Article 185e of the Code of Criminal Procedure and the conditions that rooms for such interrogations must meet (Journal of Laws 2024, item 1477)

- <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20240001477>

d) Regulation of the Minister of Justice of October 31, 2024, on specifying templates of information on the course, manner, and conditions of interrogation of suspects and witnesses under 18 years of age (Journal of Laws 2024, item 1645)

- <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20240001645>

e) Regulation of the Minister of Justice of January 13, 2025, on specifying templates of information on the course, manner, and conditions of interrogation for persons interrogated under the procedures in Articles 185a-185c and 185e of the Code of Criminal Procedure (Journal of Laws 2025, item 59)

- <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20250000059>

f) Regulation of the Minister of Justice of February 2, 2025, on specifying the template of the individual assessment questionnaire for victims and witnesses (Journal of Laws 2025, item 161)

- <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20250000161>

Child Protection Standards for Children with Special Educational Needs, including Disabilities.

Guidelines for Standards – link:

<https://www.gov.pl/web/sprawiedliwosc/wytyczne-do-sod-dzieci-ze-specjalnymi-potrzebami-edukacyjnymi-w-tym-z-niepelnosprawnosciami>

These child protection standards for children with special educational needs, including disabilities, also define the responsibilities of staff in difficult situations and designate persons who are trained and authorized to intervene.

Any person—not necessarily appropriately trained or directly working with children—may notice difficult behaviours or be informed about them. Therefore, every employee has a duty to react in such situations – to try to stop the situation and ensure the safety of all those involved.

In addition, the standards may include procedures to provide step-by-step guidance on how to respond to difficult situations:

#### 1. Observation

Any employee who notices tension, agitation, or other challenging behaviour must address it as quickly as possible. They should try to prevent such behaviour from developing, for example, by talking to the child calmly about a neutral topic, redirecting the child's attention, or taking other soothing actions.

#### 2. Escalation

If the difficult behaviour intensifies, the employee should attempt to de-escalate or interrupt it via proactive or non-aversive reactive strategies, keeping in mind previously recognized risks and individual intervention rules specific to the child.

#### 3. Contact with Designated Person

If calming attempts fail, the employee should contact the person designated for intervention. If that is not possible, other nearby staff should be asked to contact that person. During difficult situations, employees should follow the directions of the person designated to intervene.

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

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

When submitting an application for international protection, Border Guard officers provide foreigners with an information leaflet containing comprehensive information about the rights and obligations of persons applying for international protection in Poland, including the rights of people belonging to so-called vulnerable groups, such as victims of human trafficking. The information leaflet is available in

four languages—Polish, Russian, English, and Arabic. However, if the foreigner does not speak any of these languages, the content of the leaflet is read to them by an interpreter present during the application submission, using the applicant's language.

After the case is registered at the Office for Foreigners, the applicant receives an SMS with a link and QR code to download the Office's informational application—Refugeebook. The app is available in Polish, English, Ukrainian, Russian, and Belarusian. It contains information on the definition of human trafficking victims, victims' rights in the international protection proceedings, and information about institutions (including contact details) providing assistance to victims of this crime. The employees of the Refugee Proceedings Department (DPU), who conduct interviews concerning granting international protection, in the case of preliminary identification of the applicant as a potential human trafficking victim, provide information regarding rights granted to foreigners during protection proceedings. The interview takes place in a language understandable to the applicant, usually in the presence of an interpreter. Since August 2025, DPU staff also use the *Catalogue of the Rights of Human Trafficking Victims in The Polish Legal System*, which contains comprehensive information about the entire system for the protection of human trafficking victims in Poland. The document is currently only available in Polish.

Furthermore, according to §3 point 1 of the Regulations of Stay in Foreigner Centres, every foreigner admitted to the centre receives in writing, in a language understandable to them, the following information:

1. the regulations of stay in the centre;
2. information about:
  - a) their rights and duties;
  - b) legal provisions regulating assistance for foreigners applying for international protection, including regulations regarding stay in the centre;
  - c) entities providing free legal aid regarding international protection cases, as referred to in Article 82a point 3 of the Act of June 13, 2003, on granting protection to foreigners in Poland;
  - d) non-governmental or international organizations whose statutory tasks include refugee matters;
  - e) national human rights protection bodies;
  - f) the use of procedures in the centre aimed at counteracting all cases of violence and responding to them, with particular emphasis on violence against minor foreigners;
  - g) the centre's lack of responsibility for money or other items held by the foreigner.

It should be additionally noted that, in response to previous GRETA recommendations, within the working group on support for human trafficking victims operating at the Inter-ministerial Team on Counteracting Human Trafficking, a document titled *Catalogue of the Rights of Human Trafficking Victims in The Polish Legal System* was developed. Representatives from the Ministry of the Interior and Administration, Ministry of Family, Labour and Social Policy, National Police Headquarters, Border Guard Headquarters, National Prosecutor's Office, Office for Foreigners, Mazovian Voivodeship Office, International Organization for Migration, La Strada Foundation, and Empowering Children Foundation participated in its preparation. The catalogue aims to provide essential information about the rights and access to assistance for human trafficking victims in a clear and easy way. The directory's structure has been designed to be comprehensive and practical, providing a practical tool for services, offices, and non-governmental organizations, and above all, ensuring access to comprehensive information for alleged and formally identified victims of human trafficking. The document includes, among others:

- the definition and characteristics of human trafficking, including all its forms;
- explanations of individual rights;
- information on where to seek help;

- key terms collected in one place explaining difficult issues such as special grants or compensation;
- legal grounds.

This catalogue has been translated into English and Spanish, with translations planned for other languages including Russian, Ukrainian, and Romanian. Distribution is planned in printed form—for Border Guard and Police use (distributed to border units with the help of Border Guard Headquarters and to local Police units with Police Headquarters support)—and electronically for use by Voivodeship Offices, Voivodeship Anti-Trafficking Teams, National Prosecutor's Office, Office for Foreigners, NGOs, and others.

Additionally, the Ministry of the Interior and Administration (MSWiA) has initiated cooperation to develop a similar document dedicated to minor victims of human trafficking.

Regardless of these efforts, Save the Children Poland developed two educational materials targeted at unaccompanied minors with a preventive nature. Their aim is to raise awareness about human trafficking risks and facilitate communication with children and youth in care institutions who do not speak Polish. These materials include:

- a brochure for caregivers, directors, and foster care staff: "On the Way to Safety – How to Support a Child in the International Protection Procedure during the First Days in the Facility (Poland, 2025)"
- informational videos for children: Series of educational videos on YouTube

b. access to legal assistance and representation;

Victims of human trafficking, like all persons applying for international protection, have the right to free legal information provided by the Office for Foreigners. After receiving a decision on granting international protection at first instance, applicants also have the right to free legal assistance, which includes drafting appeals against unsatisfactory decisions and representation in proceedings. Legal aid is provided by attorneys, legal advisers, or persons employed in NGOs authorized to provide free legal aid.

In Poland, every human trafficking victim, including minors, is covered by the Victim/Witness Support and Protection Program carried out by the National Consulting and Intervention Centre for the Victims of Trafficking (KCIK). The Centre is a public task, implemented and financed by MSWiA, directed at both Polish and foreign victims.

According to data periodically submitted by the National Prosecutor's Office to the Ministry of the Interior and Administration, the number of identified minor victims of human trafficking in Poland in 2024 was 4 out of 316 total victims, while in 2023 it was 11 out of 1,043 total victims.

For unaccompanied minors in Poland preliminarily identified as trafficking victims, the guardianship court issues an order placing them in a specialized care facility prepared to receive minor trafficking victims or in foster care, and appoints a legal representative, usually a KCIK specialist serving as a temporary legal guardian. These actions are undertaken promptly with respect for the child's best interests. The appointed guardian represents the child in court proceedings related to guardianship and in other cases, such as residence legalization or organization of safe return to the country of origin (if it is in the child's best interest and safety can be guaranteed). It is important to emphasize that, despite the relatively low number of minors formally identified in Poland as trafficking victims, MSWiA receives signals from KCIK about difficulties in finding appropriate care facilities or foster families prepared to accept minor trafficking victims.

Caregivers and staff in care institutions or foster families hosting minor trafficking victims should be

properly trained in care and work with crime victims; they should also be aware of the cultural context of the child's country of origin and have communication tools (such as shared language knowledge). Children who were sexually exploited and struggle with trauma may exhibit difficult, sometimes aggressive, destructive, or self-destructive behaviours. Caregivers should be prepared for such behaviours and know how to respond without harm to the child or other minors present. Another challenge is multiple relocations of the child before reaching a suitable facility. For all minors, especially crime victims, it is crucial to provide appropriate conditions to address trauma quickly through stability and a sense of security. Changing caregivers or relocating children may deepen trauma and destabilization, adversely affecting recovery and bonding with the caregiver. While larger cities offer better access to translators and psychologists for minor foreign trafficking victims, smaller towns face greater challenges in this area.

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

When there is a suspicion that a person may be a potential victim of human trafficking, a special procedure (regulated by Algorithms) is initiated, aimed at protecting the victim, ensuring their safety, providing assistance and support, and enabling effective prosecution of offenders (including securing, obtaining, and preserving evidence). The early-stage procedure includes isolating the potential victim from the perpetrator(s), providing first aid including, if necessary, notifying qualified medical services, establishing the facts through questioning or interviewing the person, securing evidence such as photos, recordings, or documents, and conducting inspections of the scene or body potentially with an expert.

If during activities by the Border Guard and Police a foreigner (EU citizen or third-country national) is identified as a presumed victim of human trafficking according to the Algorithm, they are informed (in a language they understand) about the following possibilities:

- assistance from the National Consulting and Intervention Centre for the Victims of Trafficking (KCIK), which includes:
  - consultations about victims' rights;
  - provision of clothing, hygiene products, food, basic medical care;
  - assistance during contact with law enforcement and judiciary;
  - psychological support;
  - interpreter assistance;
  - transport within the country;
  - help with residence legalization;
  - legal consultations;
  - access to vocational and Polish language courses based on needs;
  - organization of safe return to the country of origin via IOM;
  - provision of safe accommodation;
  - access to social assistance per Article 5a of the Social Assistance Act.

Every presumed victim of trafficking, besides receiving a Certificate under Article 170 of the Foreigners Act of December 12, 2013, is mandatorily informed about their rights, including the right to reflection (including residence legalization) and the possibility of obtaining a temporary residence permit as a trafficking victim per Article 176 of the Foreigners Act, if meeting the criteria therein.

If the international protection procedure indicates the applicant needs special treatment (e.g., is a potential trafficking victim), medical or psychological examinations can be ordered to confirm this. Persons belonging to so-called vulnerable groups are entitled to special procedural guarantees in the procedure for granting international protection. Activities involving them are conducted:

- under conditions ensuring free expression and adjusted to their psychophysical condition;
- on a schedule adjusted to their mental and physical state, considering healthcare appointments;
- at their residence, if justified by their health;
- with a psychologist, doctor, or interpreter present, if needed;
- by an officer of the same gender, upon request;
- with psychologist, doctor, or interpreter of the requested gender, upon request.

Trafficking victims seeking international protection have the right to seek employment under the same conditions as other applicants. If protection proceedings are not concluded within six months and the delay is not the applicant's fault, they may apply for a certificate which, along with a temporary foreigner identity certificate (TZTC), authorizes work in Poland. The certificate is valid until the protection decision becomes final.

Foreigner centres follow Procedure no. 13/2022 on handling foreigners requiring special treatment in social assistance and medical care. If a person is deemed to require special treatment (e.g., a trafficking victim), social assistance may provide accommodation in centres adapted for persons with disabilities, women-only or women with children centres, or single rooms. Additionally, placement in care and treatment centres, nursing homes, or hospices may be arranged; special diets may be adapted; financial benefits can be granted to cover costs of stay in Poland.

Medical care and education are covered in section 2.e.

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

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

The Act on *the conditions of admissibility of entrusting work to foreigners on the territory of the Republic of Poland* introduced in Article 5 the obligation to inform in writing in a language understandable to the foreigner about the possibility of joining trade unions. Furthermore, Article 59 of the aforementioned Act provides protection for seasonal workers, stating that the rent for residential quarters may be deducted from the foreigner's salary. Provisions of the contract allowing for the automatic deduction of rent from the foreigner's salary are invalid. The rent for residential quarters specified in the rental agreement cannot be excessive in relation to the net salary received by the foreigner during the rental period, taking into account the standard of accommodation and market rates. The foreigner may also report to the starosta (district governor), who issued the seasonal work permit concerning that foreigner, that the residential quarters do not meet the conditions envisaged for premises intended for human stay during their use.

The Ministry of Family, Labour and Social Policy prepared in June 2025 a leaflet entitled "Work in Poland. Information for foreigners from third countries" - it was prepared in Polish and translated into five foreign languages: English, Spanish, Ukrainian, Belarusian, and Russian. The leaflet contains the most important information about legal regulations concerning performing work in Poland by foreigners as well as addresses of state institutions that help protect workers' rights. The leaflet has been posted on the websites of Public Employment Services - to be downloaded and printed by local labour offices, Voivodeship offices, and employers.

Link to the leaflet:

<https://psz.praca.gov.pl/dla-pracodawcow-i-przedsiębiorców/zatrudnianie->

cudzoziemcow/zatrudnienie-obywateli-panstw-trzecich-w-polsce

The Ministry of Family, Labour and Social Policy (Ministerstwo Rodziny, Pracy i Polityki Społecznej) in Poland provides information on labour law and employment matters, including queries from citizens, foreigners, entrepreneurs, and institutions via written and telephone contact. The Ministry has a dedicated website with up-to-date information on labour law regulations.

For foreigners, comprehensive information about entry and stay regulations in Poland, visa procedures, and residence permits is available on the **Moduł Obsługi Spraw** (Case Management Module) portal, managed by the Head of the Office for Foreigners. This portal offers information in Polish, English, Ukrainian, Russian, and French: <https://www.mos.cudzoziemcy.gov.pl/>. The Case Management Module portal also provides information on the general rules for foreigners working in Poland, as well as links to the Public Employment Services Portal's information pages on the employment of foreigners. The Public Employment Services Portal also provides information on the rights and obligations of foreigners in the area of employment, employee rights, types of contracts under which work can be performed, requirements for these contracts, unemployment benefits, job search methods, as well as contact details and links to relevant bodies and institutions in the area of foreigner employment (including the National Labour Inspection), the IOM, and non-governmental organizations supporting foreigners in this area.

b. provision of clear employment contracts;

The provisions of the Act of March 20, 2025, on the *Conditions of Admissibility of Entrusting Work To Foreigners on the Territory of the Republic of Poland* (Journal of Laws of 2025, item 621) require the employer to conclude a contract with the foreigner in a language understandable to him. The employer is also obliged to conclude a contract with the foreigner before allowing him to perform work. The employer's obligation also includes delivering a copy of the contract concluded with the foreigner to the authority that issued the work permit – this helps in controls of the legality of employment and stay of foreigners in Poland.

Based on Article 11 of the Act of June 26, 1974 - Labour Code (also referred to as the Labor Code), establishing an employment relationship and determining the conditions of work and pay, regardless of the legal basis of this relationship, requires the consistent declaration of will of the employer and the employee. The lack of such consent from the employer or employee results in the contract of employment not being able to be concluded. Applicable labour law imposes a number of obligations on the employer when employing employees. The rule is that the employment contract is concluded in writing (Art. 29 § 2 sentence 1 of the Labour Code). However, the employment contract may also be concluded in the event of consistent declarations of intent by both parties to the employment relationship (i.e., by the employer and the employee) despite failure to observe the form required by regulations. The employee may express consent to the conditions proposed by the employer not only explicitly but also implicitly, e.g., by starting work as a result of what is known as allowing him to work by the employer. According to Article 60 of the Civil Code of April 23, 1964, in conjunction with Article 300 of the Labour Code, the will of the parties may be expressed by any of their behaviour that reveals it sufficiently (e.g., Supreme Court judgments of September 20, 1977, I PR 67/77, Lex no. 14422, and November 4, 2009, I PK 105/09, Lex no. 558562). Thus, in the case of the employee's consent to the proposed conditions being expressed implicitly (by undertaking the proposed work with the employer's knowledge), despite failure to observe the written form, the parties effectively conclude an employment contract (see e.g., Supreme Court judgment of July 27, 2011, II PK 29/11, Lex no. 1044009 and the aforementioned Supreme Court judgment of November 4, 2009, I PK 105/09). The current wording of Art. 29 § 2 of the Labor Code serves to prevent potential abuses. According to this provision, the employment contract is concluded in writing. If the employment contract was not concluded in writing, the employer, before allowing the employee to work, confirms the findings as to the parties to the contract, type of contract, and its terms in writing to the employee. This wording of the above provision was introduced by the Act of May 13, 2016, amending the Labour

Code. The imposition on the employer of the obligation to confirm in writing to the employee the basic arrangements related to the conclusion of the employment contract before allowing the employee to work was aimed at equipping the National Labour Inspectorate with a tool to check the legality of employment in this respect. Moreover, having a written employment contract or written confirmation of the basic arrangements regarding the conclusion of an employment contract in a form other than written before allowing work facilitates employees in pursuing their due benefits and rights from the employment relationship and enables the use of protection guaranteed by social insurance regulations. It should also be emphasized that failure by the employer to confirm in writing the employment contract concluded with the employee before allowing him to work constitutes an offense defined in Art. 281 of the Labour Code.

It should also be remembered that the Act of March 9, 2023, amending the Labour Code and some other acts, significantly extended Art. 29 § 3 of the Labour Code. This provision now imposes on the employer the obligation to inform the employee in paper or electronic form – no later than within 7 days from the day of allowing to work – at least about:

- a) the employee's applicable daily and weekly working time norm,
- b) the applicable daily and weekly working time dimension,
- c) breaks to which the employee is entitled at work,
- d) daily and weekly rest to which the employee is entitled,
- e) rules concerning overtime work and its compensation,
- f) in the case of shift work - rules concerning transition from one shift to another,
- g) in the case of several places of work - rules concerning movement between workplaces,
- h) components of remuneration and cash or in-kind benefits to which the employee is entitled other than those agreed upon in the employment contract,
- i) the extent of paid leave to which the employee is entitled, in particular annual leave or, if it is not possible to specify it on the date of providing the employee with this information, the rules for its determination and granting,
- j) applicable rules for terminating the employment relationship, including formal requirements, length of notice periods, and deadlines for appeal to the labour court or, if it is not possible to specify the length of notice periods on the date of providing the employee with this information, the method of determining such notice periods,
- k) the employee's right to training, if the employer provides it, in particular the general principles of the employer's training policy,
- l) the collective labour agreement or other collective agreement covering the employee, and in the case of a collective agreement concluded outside the workplace by joint bodies or institutions – the name of such bodies or institutions,
- m) in case the employer has not established work regulations – the date, place, time, and frequency of salary payment for work, night work, and the method adopted by the employer for employees to confirm their arrival and presence at work and justify absences from work.

Every employee also has the possibility to terminate the employment relationship. Pursuant to Art. 30 of the Labour Code, the employment contract is terminated:

- a) by mutual agreement of the parties;
- b) by declaration of one of the parties, observing the notice period (termination of the employment contract by notice);

- c) by a statement of one party without observing the notice period (termination without notice – in the case of an employee, this may occur if a medical certificate confirming the harmful effect of the work on the employee's health is issued, and the employer does not transfer him within the period indicated in the medical certificate to another job appropriate for his health condition and professional qualifications or in the case the employer commits a gross breach of basic obligations towards the employee – Art. 55 of the Labour Code),
  - d) upon expiry of the period for which the contract was concluded.
- c. access to decent work and housing, health care, social services and education;

Regarding access to decent work, it can be stated that a requirement for granting a temporary residence and work permit, as referred to in Article 114 paragraph 1 of the Act of December 12, 2013 *on Foreigners* (Journal of Laws 2025, item 1079) is that the monthly salary amount must not be lower than the minimum wage, regardless of the working time or the type of legal relationship forming the basis for the foreigner's work (due to common practice of underreporting employment type or working hours in the contract compared to actual work performed). Additionally, the salary must not be lower than that of employees performing comparable work or holding comparable positions under the same working time conditions.

Regarding access to healthcare, a requirement for granting a temporary residence and work permit is that the foreigner must have health insurance according to the provisions of the Act of August 27, 2004 *on Healthcare Services Financed from Public Funds* (Journal of Laws 2024, item 146, as amended), or confirmation from the insurer covering medical treatment costs on the territory of the Republic of Poland.

The condition for granting a seasonal work permit is that the wage specified in the contract with the foreigner cannot be lower than the salary of employees performing comparable work or holding comparable positions under the same working time (Article 45 paragraph 1 point 2 of the Act of March 20, 2025 *on the Conditions of Permissible Employment of Foreigners in Poland* (Journal of Laws, item 621)).

Article 59 of the Act of March 20, 2025 on conditions of permissible employment of foreigners in Poland regulates accommodation for foreigners employed seasonally.

1. If a foreigner enters Poland on a visa for seasonal work or visa-free travel related to a seasonal work permit application registered in the system, and the Polish entity assigning work to the foreigner provides accommodation, the entity must conclude a separate written contract with the foreigner specifying the terms of rental or use of the residential premises.
2. Rent for the residential premises mentioned in paragraph 1 cannot be deducted from the foreigner's salary. Contract provisions permitting automatic rent deduction from wages are invalid.
3. The rent specified in the rental contract must not be excessive compared to the net salary the foreigner receives during the rental period, considering housing standards and market rates.
4. Before signing the contract mentioned in paragraph 1, the Polish entity assigning work must provide the foreigner with a translation of the contract into a language they understand.
5. A foreigner whose accommodation is provided by the Polish work assigner may report to the local authority (starosta), which issued the seasonal work permit, if the accommodation does not meet the standards required for human habitation during use.
6. The starosta shall submit the notification referred to in paragraph 5 to the authorities competent to monitor compliance with the regulations regarding the maintenance of buildings.

Regarding posted workers, under Article 140 of the Foreigners Act, temporary residence permits for foreigners posted by foreign employers to Poland are granted if the foreigner:

- 1) Holds a work permit under the Act of March 20, 2025 on *Permissible Employment of Foreigners*, or a written employer's statement of intent to employ if a permit is not required;
- 2) Has health insurance as per the Act of August 27, 2004 on *Healthcare Services Financed from Public Funds* or confirmation of insurer coverage for medical treatment costs in Poland;
- 3) Has a stable and regular income sufficient to cover living costs for themselves and family members dependent on them;
- 4) Has ensured accommodation in Poland.

The monthly income must be higher than the income threshold qualifying for social assistance benefits according to the Act of March 12, 2004 on social assistance, for the foreigner and each dependent family member.

A work permit related to posting a foreigner by a foreign entity in Poland is granted if (Article 41 of the Act of March 20, 2025 on permissible employment of foreigners):

- 1) The foreigner's work is performed under appropriate employment conditions consistent with Article 4, paragraphs 1 and 2 points 1-8 (which concern employment conditions no less favourable than those specified by Polish labour law regarding work time norms and limits, daily and weekly rest periods, annual leave, wages, occupational safety and health) and Article 5 of the Act of June 10, 2016 on *Posting Workers within the Provision of Services*;
- 2) The amount of remuneration to which the foreigner will be entitled for performing work will not be lower than 70% of the average monthly remuneration in the Voivodeship current on the day of submitting the application, announced by the President of the Central Statistical Office on the basis of Article 30 paragraph 2 of the Act of 26 October 1995 on social forms of housing development;;
- 3) The foreign entity designates a person present in Poland authorized and documented to fulfil the obligations under points 1 and 2, authorized to represent the entity before the voivode and other authorities as per Article 17 paragraph 1 point 9.

Additionally, the Act of June 10, 2016 on *Posting Workers* includes mechanisms controlling posted workers' employment conditions, compliance with posting regulations, information obligations related to posting, cooperation with relevant authorities of other EU states regarding posting to and from Poland, and protection of posted workers in Poland and abroad.

d. possibility to change employers;

A foreigner must have a work permit or a declaration of entrusting work and a legal residence basis to work legally in Poland. Foreigners working in Poland can change employers or have several employers at the same time. However, each employer must apply for the appropriate document authorizing the foreigner to work. The same rule applies when changing employers.

Regarding changing employers, a temporary residence and work permit can be changed at any time, upon the foreigner's request, by the Voivode competent for the foreigner's current place of residence, if the foreigner intends to work for another entity entrusting the work, under conditions exempting from the work permit requirement, for another user employer, or under conditions different from those specified in the temporary residence and work permit (Article 120 of the Act on Foreigners).

For seasonal workers, Article 185a of the Act on Foreigners provides for granting a temporary residence permit due to seasonal work. This permit is granted to a foreigner when the purpose of their stay in the territory of the Republic of Poland is to perform seasonal work for the entity entrusting the foreigner with work who previously employed that foreigner, or for another entity entrusting the foreigner with work, if the foreigner meets all of the following conditions:

- 1) Entered the territory of the Republic of Poland based on a visa issued for work under a seasonal work permit or visa-free movement, related to the application for a seasonal work permit recorded in the registry of applications, as referred to in Article 73 paragraph 2 of the Act of March 20, 2025, on conditions for allowing foreigners to work in Poland;
- 2) Holds a seasonal work permit or an extension of the seasonal work permit, valid for a period longer than their stay specified in the visa or visa-free movement;
- 3) Has a stable and regular source of income sufficient to cover living expenses;
- 4) Possesses health insurance within the meaning of the Act of August 27, 2004, on *Health Care Services Financed from Public Funds*, or confirmation from an insurer covering treatment costs in the territory of Poland;
- 5) Has guaranteed accommodation in Poland.

This permit is granted for the duration of the foreigner's seasonal work permit or its extension, not exceeding 9 months from the first entry date mentioned in point 1, in the given calendar year. The permit can also be granted if the circumstances for applying do not justify the foreigner's stay in Poland for longer than 3 months.

Foreigners legally present in Poland to perform seasonal work may also apply for a temporary residence and work permit, as referred to in Article 114 of the Act on Foreigners, if they intend to perform work other than seasonal work.

- e. access to confidential complaints mechanisms;

The Ministry of Family, Labour, and Social Policy does not have a separate confidential complaint mechanism for foreigners at risk of human trafficking. If a complaint is filed regarding irregularities in the employment of foreign workers under the general provisions of the Administrative Procedure Code, such complaints are forwarded to the relevant authorities, i.e., the Border Guard and the State Labour Inspection, for investigation and potential enforcement actions against offending entities.

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

The provisions of the law from March 20, 2025, on the *Conditions of Admissibility of Entrusting Work To Foreigners on the Territory of the Republic of Poland* require employers to inform foreign employees about their right to join a trade union in Poland.

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

Regarding seasonal workers, Article 185a of the Act on Foreigners provides for granting a temporary residence permit for seasonal work. This permit is granted to a foreigner when the purpose of their stay in the territory of the Republic of Poland is to perform seasonal work for an entity that employed the foreigner previously or for another entity assigning work to the foreigner, provided that the foreigner meets all the following conditions:

- 1) they entered Poland on the basis of a visa issued for the purpose of performing work under a seasonal work permit, or within the visa-free regime, related to an application for

a seasonal work permit registered in the application records referred to in the Act of March 20, 2025, on the *Conditions For Permitting Work To Foreigners In Poland*;

- 2) they hold a seasonal work permit or an extension thereof, valid beyond the stay period specified in the visa or visa-free stay;
- 3) they have a stable and regular source of income sufficient to cover living costs;
- 4) they have health insurance as defined by the Act of August 27, 2004, on *Publicly Funded Healthcare Benefits*, or confirmation from an insurer covering medical treatment costs in Poland;
- 5) they have secured accommodation within Poland.

This permit is granted for the duration of the foreigner's seasonal work permit or extension of a seasonal work permit, no longer than 9 months from the date of first entry, referred to in paragraph 1, point 1, occurring in a given calendar year. This permit may also be granted if the circumstances of applying for this permit do not justify the foreigner's stay in the territory of the Republic of Poland for a period longer than 3 months.

Foreign workers legally staying in Poland for the purpose of seasonal work may also apply for a temporary residence and work permit under Article 114 of the Act on Foreigners to perform work other than seasonal.

Regarding the legal possibilities for foreigners to regularize their stay in Poland, if necessary, a foreigner may apply for a temporary residence permit due to circumstances requiring a short stay, as mentioned in Article 181 of the Act on Foreigners. This permit is granted if the foreigner's presence in Poland is required due to exceptional personal circumstances. Applications for this permit may be submitted even after the expiration of the legal stay. The permit can be granted for the period necessary to fulfil its purpose, but not longer than 6 months.

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

According to Article 1 of the Act of April 13, 2007, on the State Labour Inspection, the State Labour Inspection (PIP) is the authority responsible for supervising and controlling compliance with labour law, particularly regulations and principles of occupational health and safety, as well as provisions concerning the legality of employment and other gainful work as specified in the act.

Under Article 24 of the PIP Act, labour inspectors have the right to conduct inspections at any time of the day or night, without prior notice. These inspections cover compliance with labour law, particularly occupational health and safety, legality of employment of Polish citizens and foreigners, payment of wages at least corresponding to the minimum hourly wage, and adherence to restrictions on trade on Sundays, holidays, and certain other days.

An inspection is conducted upon presentation of an official ID confirming the identity and authority of the labour inspector or other authorized employee of the National Labour Inspection, as well as authorization to conduct the inspection. Furthermore, if factual circumstances justify the immediate initiation of an inspection at the entrepreneur's premises, it may be conducted upon presentation of

an official ID (the inspected party must be provided with an authorization to conduct the inspection immediately, but no later than 7 days from the date of the inspection).

The statutory scope of competence of every labour inspector remains the same, regardless of the entity being inspected. Therefore, every labour inspector, particularly those conducting inspections of occupational health and safety and the legality of the employment of foreigners, pays special attention to whether there are any signs of employee exploitation within the inspected entity.

The basic powers of a labour inspector used for this purpose include (Article 23 of the Act on the National Labour Inspectorate):

- free access to the premises and facilities of the inspected entity;
- demanding written and oral information from employees and other persons working for the entity, including those working under contracts other than employment or using employment agencies; recording inspection proceedings using technical equipment;
- checking the identity of persons performing work or staying on the premises of the inspected entity, as well as persons using the services of employment agencies, questioning them and requesting declarations on the legality of employment or conducting other gainful activities;
- protecting the confidentiality of sources providing information;
- starting an inspection without authorization, i.e. after presenting an official ID, if factual circumstances justify immediate initiation of an inspection at the entrepreneur's premises;

and not being obliged to announce their presence if doing so might affect the outcome of the inspection.

Planned inspections are conducted in selected entities where the largest scale and risk of irregularities regarding the legality of employing foreigners are expected. In particular, these inspections cover:

- a) Selected entities conducting business activities in sectors with the highest intensity of work performed by foreigners illegally present in Poland, according to the risk assessment presented by the Ministry of Family and Social Policy (MRIPS), i.e., activities related to accommodation and catering services (PKD Section I), construction (F), and other service activities (S);
- b) Entities in which the inspection results from a complaint filed by a foreigner or information obtained about irregularities in employing foreigners, for example, based on a request or notification received from another authority;
- c) Selected entities in industries in which illegal employment of foreigners was found in previous years or where information about violations against foreigners has been obtained, for example, through the media;
- d) Employment agencies providing work placement services, i.e., directing foreigners to employment or other gainful work with entities operating in Poland, as well as temporary employment agencies and user employers entrusting work to foreigners as part of temporary work;
- e) Foreign employers from third countries delegating workers to perform work in Poland, as well as employers delegating foreigners from Poland within the framework of service provision.

It is worth noting that due to observed phenomena in the labour market concerning foreign workers, the State Labour Inspection's Action Program for 2025-2027 includes comprehensive inspections of

workplaces, including those within multi-level subcontracting structures, where foreigners perform work. These inspections will target strategically important enterprises and large investments relevant to the country or region, carried out in cooperation with many entities. The goal is a comprehensive examination of issues related to assigning and performing work by foreigners in Poland under various legal bases—contracts with the home employer, temporary work, or delegation—both to detect illegal work and practices that contradict the nature of the work or applicable legal requirements. Selected aspects of legal labour protection, particularly working time and remuneration for foreigners, will also be verified.

Regarding technical resources available to inspectors, all labour inspectors use official laptops equipped with Navigator software developed by PIP staff. This multi-module tool supports all inspection stages from planning (scheduling, work plans, delegations, company selection through access to business databases, reviewing prior inspection results, legal measures) through execution (access to official forms, regulations, internal dictionaries, codes, prompts, and commonly applied legal measures) to completion and reporting (substantive and financial). Navigator facilitates and accelerates preparing inspection reports and related documents under legal requirements.

Inspectors conducting highly specialized inspections (e.g., market supervision, vehicle driving time, breaks, rest periods, and drivers' working hours) have access to additional dedicated software.

Regional labour inspectorates base their inspections on guidelines and checklists for specific topics developed by the Chief Labour Inspection. For their own inspection topics, regional inspectorates develop assumptions and guidelines. Both central and regional topics have guidelines, checklists, and digital templates accessible on the PIP server. Inspectors have full access and can copy materials to their laptops. These materials indicate the necessary information to diagnose and systematically monitor selected labour protection areas.

Significant support for inspectors comes from specialized training, during which practical aspects of conducting controls in specific areas are taught. Trainings involve coordinators of inspection and preventive topics both locally—inspectors appointed in regional inspectorates—and centrally at the Chief Labour Inspection. Training includes analysis of guidelines and checklists, practical control methods, and sanctions applicable for specific irregularities. Coordinators provide continuous substantive support to inspectors, including telephone contact.

Regarding staffing, as of December 31, 2024, PIP employed 2,699 people. Among them, 94.6% have higher education. There were 1,463 inspectors, 42 senior labour inspectors (branch heads), and 48 managerial inspectors (regional inspectors and deputies). In the reporting year, 70 people obtained inspector qualifications after completing the multi-month application process and passing the state exam successfully.

The State Labour Inspection cooperates with various state administration bodies, especially those overseeing and controlling working conditions, including the National Revenue Administration, Police, Border Guard, Social Insurance Institution (ZUS), and local government authorities. In joint inspections, the objectives of labour inspectorates and the role of immigration authorities are clearly defined in the Agreement between the Chief Labour Inspector and the Chief Commander of the Border Guard dated December 10, 2018. This cooperation involves joint inspections by PIP inspectors and Border Guard officers focusing on controlling compliance with regulations concerning foreigners and sharing experiences related to identifying individuals who may be victims of human trafficking for forced labour. Both PIP and the Border Guard operate independently within their statutory powers. When joint inspections are necessary, each side appoints representatives, sets the scope and schedule of the inspection, and designates who will lead it.

Furthermore, during inspections, the labour inspector collaborates with trade unions, employee self-government bodies, works councils, and the Social Labour Inspection. This collaboration includes, in particular:

- 1) providing information on the subject matter and scope of the inspection;
- 2) analysing submitted comments and observations;
- 3) reporting on inspection results and decisions;
- 4) providing advice and information on labour law.

If trade unions, employee self-government bodies, works councils, or the social labour inspectorate operate at the inspected employer, the labour inspector informs them about the subject matter and scope of the inspection, as well as its results and decisions. During the inspection, the inspector also analyses their comments and observations and provides them with advice and information on labour law. This cooperation aims to ensure that the labour inspector receives information regarding the inspection not only from the employer but also from employee representatives, whose comments may expand the scope of the inspection to include additional issues or indicate to the labour inspector where to seek evidence to confirm the validity of the observations.

Under Polish law, the State Labour Inspection is the sole institution authorized to supervise and control employers' compliance with labour law per the Act of April 13, 2007. It has legal powers to enforce labour law, prosecute offenses against workers' rights, and provide legal advice on labour law. Its competent regional inspectorates have authority to inspect workplaces, access premises freely, request employment-related documents, issue orders to remedy violations, and represent the public prosecutor in labour offenses. Furthermore, pursuant to Article 11, Section 7 of the Act on the National Labour Inspection, if a violation of labour law or regulations concerning the legality of employment is detected, the relevant National Labour Inspection authorities are authorized to order the employer to pay the due remuneration for work, as well as any other benefits due to the employee. Orders in these matters are immediately enforceable. A labour inspector may also impose a fine on the employer by way of a penalty notice if they deem this sufficient (Article 95, Section 3 of the Act of 24 August 2001 – Code of Procedure in Petty Offenses<sup>6</sup>) or submit a motion for punishment to the court. It should be emphasized that the Minister of Family, Labour and Social Policy does not supervise or control the activities of the National Labour Inspection; supervision of this institution's activities within the scope specified in the Act on the National Labour Inspection is exercised by the Labour Protection Council. Therefore, information on the human, financial, and technical resources of the National Labour Inspection, methods of conducting inspections, and cooperation with other bodies can be provided by the Chief Labour Inspection.

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

Starting June 1, 2025, there have been changes to the regulations governing the operation of employment agencies. The Act of March 20, 2025, on the labour market and employment services (Journal of Laws 2025, item 620), which came into force on June 1, 2025, replaced the previously applicable Act of April 20, 2004, on the promotion of employment and labour market institutions (consolidated text, Journal of Laws 2025, item 214, as amended).

Under the current regulations, the activities of employment agencies remain regulated and require registration in the employment agency register. Employment agencies are entities registered in the employment agency register that provide services in the field of job placement and temporary work. The obligation to register in the register of personnel consulting and career counselling services has been abolished; previously, providing such services was a regulated activity under the repealed Act on the promotion of employment and labour market institutions. Additionally, the requirement to

issue certificates authorizing the provision of employment agency services has been eliminated. The obligation to register in the employment agency register therefore applies only to two types of services: job placement and temporary work. The scope of job placement services provided by employment agencies requiring registration has been expanded to include activities involving the collection and dissemination of information about available and sought-after job positions via information technology systems.

The operation of employment agencies falls under the competence of:

- The Voivodeship governor, as the authority maintaining the employment agency register, regarding compliance with the conditions for operating an employment agency, as specified in Article 305 paragraph 3, Article 307 paragraph 1 points 1–4 and 9 and paragraph 2, Article 323, and Article 324 (fulfilling the conditions required to begin providing job placement or temporary work services for foreigners; meeting the conditions by the entity applying for registration, fulfilling the obligation to provide information about the agency's activities to the Voivodeship governor, as well as correctly labelling job offers by the employment agency); and
- The State Labour Inspection.

The State Labour Inspection's supervisory tasks, in the area related to the activities of employment agencies, as defined in Article 10 paragraph 1 point 3 letters d, e, and f of the Act of April 13, 2007, on the State Labour Inspectorate (consolidated text, Journal of Laws 2024, item 1712, as amended), include monitoring compliance with the obligation:

- To register in the employment agency register any activity whose conduct is subject to registration in this register;
- To operate employment agencies in accordance with the conditions specified in the Act on the *Labour Market And Employment Services*;
- For entities mentioned in Article 306 paragraph 1 and entities conducting activities mentioned in Article 306 paragraph 2 of the Act of March 20, 2025, on *The Labour Market And Employment Services*, to operate in accordance with the conditions specified in Article 306 paragraph 3, Article 319, Article 321, Article 325, and Article 338 paragraphs 2 and 3 of this Act.

Additionally, the Act on the State Labour Inspection, in Article 37 paragraph 3 point 1, obliges the district labour inspector to promptly notify the Voivodeship governor of any instances of violations of the conditions for operating employment agencies specified in the labour market and employment services regulations. As a consequence, the Voivodeship governor may, by decision, remove the entity from the register.

It should be noted that for employment agencies providing temporary work services, in addition to fulfilling obligations arising from the Act on the labour market and employment services, compliance with the provisions of the Act of July 9, 2003, on the *Employment Of Temporary Workers* (consolidated text, Journal of Laws 2025, item 236, as amended), the Labour Code, and other legal acts issued on its basis is also subject to assessment.

Inspections at employment agencies are a regular task of the Office, conducted comprehensively both in previous years and in the current year, in agencies providing temporary work services and job placement services, including those involving directing individuals to work abroad for foreign

employers, as well as directing foreigners to employment or other paid work for entities conducting business activities on the territory of the Republic of Poland.

In 2025, comprehensive assessments of compliance with the law—including the provisions of the Act on the *Labor Market And Employment Services* and the Act on the *Employment Of Temporary Workers*—in entities providing employment agency services, both job placement and/or temporary work, as well as in entities using their services, include the following thematic inspections:

- Compliance with regulations on the conditions for operating employment agencies, including those operated by entities/foreigners from outside the EU;
- Compliance with regulations on the employment of temporary workers;
- Compliance with regulations governing the employment of temporary workers by user employers; and
- Circumvention of the Act on the employment of temporary workers with outsourcing/leasing.

The presented inspection model for employment agencies is based on detailed inspection guidelines, under which, as a rule, every entity involved in assigning work to individuals seeking employment in Poland, including foreigners, is subject to inspection by a labour inspector.

This scope is subject to ongoing modifications related to changes in applicable legal regulations, as well as taking into account changes in the Polish labour market and identified practices of circumventing legal provisions, including risks concerning foreigners seeking employment in Poland, as well as those conducting business activities in Poland, including regulated activities and those assigning work to foreigners. The most recent update, which took place this year, was particularly related to changes in regulations regarding the operation of employment agencies, including those concerning the conditions for providing job placement or temporary work services for foreigners, who are required to have a work permit or a declaration of assigning work to a foreigner, as specified in Article 6 of the Act of March 20, 2025, on the *Conditions For Assigning Work To Foreigners On The Territory Of The Republic Of Poland*.

Inspections at employment agencies are conducted when considering the legitimacy of complaints filed by employees or individuals using the services of agencies or entities mentioned in Article 306 of the Act on the labour market and employment services, i.e., entities conducting activities not requiring registration, as well as in cases of suspicion of violating the provisions of this Act, particularly illegal provision of employment agency services, including in entities selected for such inspections as a result of ongoing monitoring of mass media (Internet, press, TV, etc.).

Monitoring activities aimed at identifying negative phenomena on the labour market (media monitoring), conducted by district labour inspectorates, focus on the most important issues related to the activities of entities providing employment agency services, namely:

- The legality of conducting business by entities recruiting individuals for employment;
- Compliance with the rules regarding the collection of fees, as specified in the Act on the *Labor Market And Employment Services*;
- The application of discriminatory practices in published job advertisements and offers;

- Correct labelling of these offers with the employment agency register entry number, as well as labelling temporary work offers as "temporary work offers."

The purpose of inspections carried out to enforce regulations on the conditions for operating agencies—including those conducted by entities/foreigners from outside the EU—is to assess compliance with the Act on the labour market and employment services by employment agencies, i.e., entities conducting business activities in the field of job placement and temporary work services. In addition to the obligation to be registered, inspections also cover, among other things, requirements concerning the possession of premises where services are provided, compliance with the prohibition of discrimination, the collection of unauthorized fees, and the preparation of written agreements with individuals directed to work abroad or with foreigners directed to work in entities conducting business activities on the territory of the Republic of Poland.

In turn, control actions covering compliance with regulations on the employment of temporary workers are carried out both in relation to temporary work agencies providing temporary work services (either exclusively or together with job placement services) and to user employers utilizing their services (compliance with regulations governing the employment of temporary workers by user employers). The inspection involves conducting a control procedure that, in scope, covers the same temporary workers simultaneously in two entities. The main aim of these control procedures is to eliminate violations of legal provisions regarding individuals performing temporary work, taking into account the provisions of the Act on the employment of temporary workers, the Labour Code, and other legal acts issued on its basis. The labour inspector therefore examines both compliance with legal provisions specifically regulating the legal status of the temporary worker—for example, directing such a worker to perform tasks that do not fit the definition of temporary work, compliance with the prohibition of assigning particularly hazardous work to temporary workers—as well as basic employer obligations, such as timely payment of wages, compliance with working time regulations, and ensuring safe and hygienic working conditions for temporary workers provided by the user employer, among others.

In cases of inspections targeting the circumvention of the Act on the *Employment Of Temporary Workers* through the use of outsourcing/leasing, the provision of outsourcing services is assessed, particularly where these services are used to replace temporary work despite the presence of circumstances characteristic of temporary work. The main objective of these proceedings is to diagnose the phenomenon of bypassing and violating the provisions of the Act on the *employment Of Temporary Workers* through the use of outsourcing, leasing, or other forms of work assignment, especially in relation to time limits for performing temporary work for a single user employer or the prohibition of assigning particularly hazardous work to persons performing temporary work. Inspections, analogous to those conducted for entities providing and using temporary work services, are carried out both for entities offering and utilizing outsourcing services. Control procedures thus cover not only temporary work agencies providing outsourcing services but also other entities offering outsourcing services, including job placement agencies and entities utilizing outsourcing services.

In response to the question of whether all stages of the recruitment process—including advertisements, selection, transportation, and job placement—are subject to regulations, it should be indicated that the provision of job placement services is comprehensively regulated, while in relation to individual stages of recruitment, reference can be made to the provisions of the Act on the *Labor Market And Employment Services*, which—significantly—also apply to these stages of the recruitment process.

The concept and principles of job placement are regulated in Article 81 of the Act on the *Labor Market And Employment Services*, according to which job placement involves providing assistance to unemployed individuals, job seekers, and unregistered persons, including those professionally

inactive, in obtaining employment or other paid work, as well as assisting employers in finding candidates for employment.

Job placement is carried out in particular by:

- 1) Acquiring and disseminating job offers;
- 2) Providing employers with information about job candidates;
- 3) Providing unemployed individuals, job seekers, or unregistered persons, including those professionally inactive, with information about job offers published in the job offer database referred to in Article 83 paragraph 1 and in other publicly accessible databases;
- 4) Initiating and organizing contacts between unemployed individuals, job seekers, or unregistered persons, including those professionally inactive, and employers, including in the form of job fairs or job markets;
- 5) Establishing and maintaining contacts with unemployed individuals, job seekers, or unregistered persons, including those professionally inactive, as well as employers.

Conducting business activities, in accordance with Article 305 paragraph 2 of the aforementioned Act, in the scope of:

- 1) Job placement, which includes services specified in Article 81 paragraph 2, as well as:
    - a) Directing individuals to work abroad for foreign employers, as referred to in Article 338 paragraph
    - b) Directing foreigners to employment or other paid work for entities conducting business activities on the territory of the Republic of Poland, as referred to in Article 337,
    - c) Collecting and disseminating information about available and sought-after job positions via information technology systems,
  - 2) Temporary work, involving the employment of workers and directing these workers and persons who are not employees to perform temporary work for and under the supervision of a user employer, according to the rules set out in the regulations on the employment of temporary workers,
- is a regulated activity within the meaning of the Act of March 6, 2018, on *Entrepreneurship Law* and requires registration in the employment agency register.

In accordance with Polish law, any entity operating an employment agency in Poland that provides job placement and temporary work services must be entered into the register of employment agencies. The National Register of Employment Agencies (KRAZ) is public and published at: <https://stor.praca.gov.pl/portal/kraz>, allowing anyone to verify the legality of the services provided by an agency.

In summary, under Polish law, conducting business activities in the field of job placement—beyond the requirement to be registered in the employment agency register—also requires operating the agency in compliance with the conditions set out in the Act on the labour market and employment services. In particular, companies providing job placement services involving directing individuals to work abroad for foreign employers or directing foreigners to employment or other paid work for entities conducting business activities in Poland are obligated to conclude a written agreement with

the person directed/foreigner and provide a written translation of the agreement in a language understandable to the individual before signing.

Regarding Polish legal regulations, it should also be emphasized that job placement for individuals seeking work in Poland is free of charge. Recruitment fees and related costs cannot be borne by employees or job seekers. According to Article 321 paragraph 1 point 1 of the Act on the *Labour Market And Employment Services*, employment agencies, entities mentioned in Article 306 paragraph 1, and entities conducting activities mentioned in Article 306 paragraph 2 may not collect amounts other than those specified in Article 338 paragraph 3 point 16 from individuals for whom they seek employment or other paid work, as well as from employees or non-employees of temporary work agencies or those receiving assistance in choosing or changing profession, workplace, direction of education or training, or in planning professional development. Only in the case of directing individuals to work abroad for a foreign employer (e.g., with headquarters in another EU country) may the agency collect amounts due to the employment agency for actual costs incurred in connection with directing to work abroad, including: travel and return of the person directed, visa issuance, medical examinations, and document translations (Article 338 paragraph 3 point 16). Violation of the rule regarding the collection of unauthorized fees results in misdemeanour liability, as specified in Article 362 paragraph 3 of the Act. According to this provision: "whoever, while providing services referred to in Article 305 paragraph 2 or Article 306, collects from a person for whom they seek employment or other paid work, as well as from an employee or non-employee of a temporary work agency or a person receiving assistance in choosing or changing profession, workplace, direction of education or training, or in planning professional development, additional fees other than those listed in Article 338 paragraph 3 point 16".

Regarding candidate selection, as well as published job offers or announcements, regulations ensuring the protection of persons using employment agency services should be noted. These require entities providing employment agency services to:

- Include the employment agency register entry number in documents, announcements, and job offers, and label advertised temporary work offers as "temporary work offers";
- Comply with the prohibition of discrimination, especially based on gender, age, race, ethnic origin, nationality, religion, worldview, disability, sexual orientation, political beliefs, or trade union membership of persons for whom they seek employment or other paid work.

The Act establishes misdemeanour liability for failure to comply with the prohibition of discrimination. According to Article 362 paragraph 4 of the Act on the labour market and employment services, non-compliance with the prohibition of discrimination when providing services referred to in Article 305 paragraph 2 (job placement and temporary work) or Article 306 (activities not requiring registration in the employment agency register), based on gender, age, disability, race, religion, ethnic origin, nationality, sexual orientation, political beliefs, worldview, or trade union membership, is punishable by a fine from 3,000 to 30,000 PLN.

In the Polish legal system, only natural persons are subject to criminal liability, which is reflected in the structure of the criminal provisions of the Act presented above.

Regarding regulations concerning transport as a stage of the recruitment process, reference should be made to regulations relating to the costs of travel and return of the person directed by employment agencies to work abroad for foreign employers as part of the job placement service. In such a case, according to Article 338 paragraph 3 points 15 and 16 of the Act, the written agreement concluded by the employment agency with the person directed to work abroad for foreign employers should specify, in particular:

- The scope of civil liability of the parties in the event of non-performance or improper performance of the agreement between the employment agency and the person directed, including the party covering the costs of travel and return of the person directed in the event of the foreign employer failing to fulfill the terms of the agreement, and the method of pursuing claims related to this;
- The amounts due to the employment agency for actual costs incurred in connection with directing to work abroad, including:
  - Travel and return of the person directed;
  - Visa issuance;
  - Medical examinations;
  - Document translations.

As mentioned, only in the case of directing individuals to work abroad for a foreign employer do the applicable regulations allow the agency to collect amounts due to the employment agency for actual costs incurred in connection with directing to work abroad, including those incurred for travel and return of the person directed (Article 338 paragraph 3 point 16 letter a).

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

The Labour Code is the act regulating the rights and obligations of employees and employers in Poland. According to Article 2 of the labour Code, an employee is a person employed on the basis of an employment contract, appointment, election, nomination, or cooperative employment contract. The provisions of Article 22 of the labour Code are designed to prevent employer abuses, such as concluding civil law contracts in situations where a person performs duties characteristic of an employment relationship. According to these provisions, employment under conditions where the employee undertakes to perform specific work for the employer, under the employer's direction, at a place designated by the employer, and the employer undertakes to employ the employee in exchange for remuneration, constitutes employment based on an employment relationship, regardless of the name of the contract concluded.

If, despite the presence of these characteristics, a civil law contract is concluded, such employment is considered to be based on an employment relationship, regardless of the contract's name, as stated in Article 22 § 11 of the Labour Code. Concluding a civil law contract in circumstances where, according to Article 22 § 1 of the Labour Code, an employment contract should have been concluded, constitutes a misdemeanour against employee rights and is punishable by a fine of 1,000 to 30,000 PLN (Article 281 § 1 point 1 of the Labour Code). The Labour Code does not contain the concept of "self-employment." It has also not been uniformly defined in other legal provisions. However, in the broadest sense, self-employment refers to the practice of cooperation between business entities, where one of the partners is an individual running a sole proprietorship and personally performing tasks (services) for the other party under a cooperation agreement. This is a phenomenon within the sphere of business activity (professional economic turnover), involving various forms of self-employment, based on the realization of diverse economic and personal goals and interests of the parties entering into the cooperation agreement. Such activity is conducted at one's own expense, risk, and responsibility.

In practice, self-employment often appears as an alternative to performing dependent work within an employment relationship. In this form of self-employment, although the self-employed person is an entity conducting business activity, self-employment is not synonymous with running a business. Business activity means that the entrepreneur voluntarily undertakes a specific type of production or service activity and operates on the market on equal footing with other entities conducting such activity. The self-employed person, however, often starts business activity because they cannot undertake or continue employment under an employment contract. The characteristic feature of such self-employment is the personal performance of work by the self-employed (most often the same tasks that were the subject of the employment contract). In cases of apparent self-employment, individuals running a sole proprietorship may apply to the labour court to determine that their legal relationship—formally being a relationship between business entities—is in fact an employment relationship, as it possesses characteristics typical of an employment relationship. Violation of Article 22 of the Labour Code may also be the basis for actions by the State Labour Inspection, the institution statutorily responsible for supervising and controlling employers' compliance with labour law. Article 10 paragraph 1 point 11 of the Act on the State Labour Inspection grants labour inspectors the right to initiate proceedings to establish the existence of an employment relationship. If violations of the law are continuous and repeated, they may be assessed as constituting a crime against employee rights as defined in Article 218 § 1 of the Criminal Code. According to this provision, anyone who, in matters relating to Labour law and social insurance, maliciously or persistently violates employee rights arising from the employment relationship or social insurance, is subject to a fine, restriction of liberty, or imprisonment for up to 2 years.

Regarding foreigners, according to Article 117a of the Act on Foreigners, a temporary residence and work permit is refused if:

- 1) The entity assigning work to a foreigner or the user employer does not conduct business activity justifying the employment of that foreigner during that period, including having suspended business activity, having been removed from the relevant register, or being in the process of liquidation;
- 2) The entity assigning work to a foreigner does not have the necessary financial means or sources of income to cover the obligations arising from the employment of the foreigner;
- 3) The entity assigning work to a foreigner was established or operates mainly to facilitate foreigners' entry into the territory of the Republic of Poland; or
- 4) Circumstances indicate that the foreigner would be employed by an entity that is not a temporary work agency operating in the territory of the Republic of Poland in accordance with applicable regulations, and the work would be performed for a third party.

According to the Act of March 20, 2025, on the conditions for assigning work to foreigners in the territory of the Republic of Poland, work permits are refused, among others, if (Article 13 paragraph 1 points 7–10 of the Act):

- Circumstances indicate that work would be assigned to a foreigner by an entity that is not a temporary work agency operating in the territory of the Republic of Poland in accordance with applicable regulations, and the work would be performed for a third party, or
- The user employer or the entity to which the foreigner is delegated does not conduct business activity justifying the assignment of work to that foreigner during that period, including having suspended business activity, having been removed from the relevant register, or being in the process of liquidation, or

- Information available to the authority considering the work permit application indicates that the likely purpose of obtaining the work permit is the apparent assignment of work to the foreigner or that the foreigner will not perform work in the territory of the Republic of Poland under the conditions specified in the permit, or
- In the 2 years preceding the date of submitting the work permit application, the foreigner who held a work permit or a declaration of assignment of work to a foreigner and entered the territory of the Republic of Poland to perform work did not perform work in the territory of the Republic of Poland, unless the non-performance was due to justified reasons.

The absence of these grounds is also a condition for issuing a seasonal work permit (Article 50 and 51 of the Act).

The requirements for posted workers, mentioned in the answer to question 7, also serve to prevent abuses discussed in this question.

The Act of July 9, 2003, on the employment of temporary workers (Journal of Laws 2025, item 236, as amended) regulates the rules for employing temporary workers by a temporary work agency and the rules for directing these workers and persons who are not employees of the temporary work agency to perform temporary work for a user employer. The maximum period for performing temporary work for a single user employer cannot exceed a total of 18 months within any consecutive 36-month period. A temporary worker may not, among other things, be assigned to perform particularly hazardous work as defined by regulations issued under Article 237 of the Labour Code. An employer cannot be a user employer for workers who are already in an employment relationship with them. During the period of performing work for the user employer, a temporary worker cannot be treated less favourably regarding working conditions and other terms of employment than employees employed by that user employer in the same or similar position. Articles 27–27b of this Act contain criminal provisions applicable to cases of violation of the rules set out in the Act.

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

Polish labour law applies to all individuals employed under an employment relationship subject to Polish law—this includes both Polish citizens and foreigners. It contains detailed provisions regarding working hours, minimum wage, as well as occupational health and safety. These regulations aim to ensure protection for all employees working within the territory of Poland.

Polish labour law also prohibits discrimination based on factors such as gender, age, disability, race, religion, nationality, political beliefs, union membership, ethnic origin, faith, and sexual orientation.

Additionally, concerning foreigners, the rules on granting temporary residence and work permits—including requirements on the level and comparability of wages for foreign workers—as well as regulations regarding foreign seasonal workers, including the wage comparability requirement for issuing seasonal work permits (mentioned in the response to question 7), also serve to prevent human trafficking by enabling legal migration and lawful employment opportunities combined with fair working conditions.

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

Forced labour is the most frequently identified form of exploitation in Poland, so state policy aimed at discouraging demand that leads to human trafficking focuses primarily on at-risk groups such as migrant workers and seasonal employees.

To reduce demand from unscrupulous companies seeking cheap, easily exploitable labour, regulations and controls regarding temporary employment agencies and entities employing foreigners have been tightened.

Rules governing the hiring of foreign seasonal workers—including requirements for granting seasonal work permits, as well as provisions regarding accommodation provided by the Polish entity assigning work to foreigners, and requirements for posted workers—also serve to discourage demand that leads to human trafficking, especially concerning at-risk and vulnerable groups such as foreign seasonal workers and posted workers.

The grounds for refusing to grant a temporary residence and work permit, as specified in Article 117a paragraph 4 of the Foreigners Act, apply when circumstances indicate that the foreigner would be employed by an entity that is not a temporary employment agency operating legally in Poland, and the work would be performed for a third party. This new provision was introduced into the Foreigners Act on June 1, 2025, and targets at-risk groups such as foreign workers engaged in subcontracting not covered by temporary work regulations. A similar provision applies to the refusal of a work permit, as outlined in Article 13 paragraph 1 point 7 of the Act of March 20, 2025, on the conditions for assigning work to foreigners on the territory of the Republic of Poland.

In the context of supply chains, human trafficking for forced labour is one of the main threats to business operations. Companies may unknowingly encounter this issue within their supply chains or when employing foreigners. The key tool for prevention is the due diligence process, which helps identify and minimize risks related to both environmental issues and human rights. The due diligence process includes six stages: integrating responsible business principles into management, identifying and assessing negative impacts, preventing them, monitoring, reporting, and taking remedial actions. On July 25, 2024, the Corporate Sustainability Due Diligence Directive (CSDDD) came into force, with the Ministry of Funds and Regional Policy (MFIPR) leading the work on the project. A working group on due diligence was also established at MFIPR, and the Polish National Contact Point for the OECD actively promotes responsible business standards through various OECD guidelines available on the OECD NCP website and its LinkedIn profile. Polish language versions of these guidelines are available on the OECD NCP website. The OECD guidelines and the issue of due diligence are also promoted through the OECD NCP's LinkedIn profile. Knowledge about business obligations—especially the importance of due diligence in preventing human rights violations in business, including forced labour—is regularly disseminated during meetings and events organized by MFIPR/OECD NCP, as well as through publications.

For example, in 2024 the following events took place:

April 11, 2024 – SGH Thursday Forum on due diligence, with 200 views on the YouTube channel.

May 27, 2024 – Webinar on due diligence in responsible business conduct, organized by the Ministry of Funds and Regional Policy and the Working Group on Social Responsibility of Universities, with 500 views on YouTube.

June 28, 2024 – Second meeting of the Working Group on Corporate Due Diligence, during which the key provisions of the EU Directive on corporate due diligence for sustainable development were presented; the recording was available on YouTube, with over 1,000 views.

October 2, 2024 – Business Forum 2024, where the OECD NCP presented issues related to due diligence during panel discussions.

October 29, 2024 – GREENPACT European ESG Summit, during which about 500 copies of OECD guidelines were distributed, and the OECD NCP presented due diligence topics in panel discussions on due diligence in supply chains and board responsibility.

December 20, 2024 – Publication of a Guide for Businesses on applying the minimum safeguards of the EU Taxonomy. The material was developed through cooperation between the Ministry of Economic Development and Technology (MRiT), the OECD NCP, and the Working Group on the Application of the EU Taxonomy at MRiT. It serves as a support tool for businesses regarding the application of due diligence, OECD Guidelines, and UN Guiding Principles on Business and Human Rights in the context of EU Taxonomy requirements.

Overall, through events organized by the OECD NCP, its participation in major business congresses, involvement in business meetings organized by other entities, distribution of OECD guidelines, and its own publications, it is estimated that in 2024, information on due diligence aimed at protecting human rights in business reached several thousand recipients—primarily businesses, but also the broader business environment, including employees, social partners, and academic circles.

Given that among identified victims in Poland, Colombians constitute the largest group, as of August 15, 2024, an exception to the visa waiver was introduced for Colombian citizens traveling to Poland for work purposes, based on Article 3 paragraph 2 of the Agreement between the European Union and the Republic of Colombia on the abolition of short-stay visas signed in Brussels on December 2, 2015, in connection with Article 6 paragraph 3 of Regulation (EU) 2018/1806 of the European Parliament and of the Council of November 14, 2018, listing third countries whose citizens must have visas when crossing external borders, and those whose citizens are exempt from this requirement. As of August 15, 2024, an exception to the visa waiver was introduced for Colombian citizens traveling to Poland for work purposes.

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

The circumstances surrounding human trafficking have changed recently. Nowadays, there is a much stronger direct link with illegal migration and human smuggling. Border Guard officers, as a formation directly involved in protecting state borders, monitoring border traffic, and combating illegal migration and border crime—including smuggling and human trafficking—are exposed to direct contact with potential victims.

To ensure the protection of victims' rights, Border Guard officers are trained to recognize indicators that may suggest a person is a potential victim of human trafficking. These trainings cover knowledge about recruitment mechanisms, psychological and physical control methods used by perpetrators, and symptoms indicating violence and exploitation. When an officer identifies someone as a potential victim during border checks or procedures related to deportation, they are obliged to act in accordance with the *Algorithm of Conduct of Law Enforcement Officers in Case of Revealing a Crime of THB*, or—for minors—with *Algorithm for Identifying and Dealing with a Minor Victim of Human Trafficking for the Police and Border Guard officers*.

If suspicion is confirmed, administrative procedures aimed at deporting the foreigner are suspended, and a support pathway is activated, including through the National Consulting and Intervention Centre for the Victims of Trafficking (KCIK).

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

The Act of June 25, 2010, on Sport (Journal of Laws 2024, item 1488, as amended) does not contain regulations on preventing human trafficking in sport. Moreover, information obtained from Polish sports associations indicates that most of them have not encountered this problem and therefore do not have dedicated preventive solutions.

However, most associations conduct trainings on ethics, respect for human rights, and equal treatment, have appropriate systems for registering athletes and coaches, run programs for the protection of minors, and cooperate with relevant authorities such as the Police and Border Guard.

As an example of actions taken, the Polish Biathlon Association stands out for its high awareness of potential risks and implements preventive measures, including:

- Education and training: regular organization of trainings for coaches, sports officials, referees, and other sector employees on recognizing and preventing cases of human trafficking;
- Cooperation with international organizations: the association collaborates with international organizations such as the International Biathlon Union to exchange information and best practices in combating human trafficking;
- Verification of athletes' legal status: introduction of procedures to carefully verify the origin and legal status of athletes, especially those recruited from countries with higher risk.

The Polish Football Association, in turn, carries out several activities related to international cooperation, aimed at reducing the risk of abuse and increasing the safety of athletes, particularly:

International transfers of minors are subject to strict control by FIFA. Each such transfer requires a positive decision from FIFA under the special FIFA Minors Transfer procedure, where circumstances, purpose, and compliance with regulations protecting minors are thoroughly analysed. The PZPN cannot register an international transfer of a player under 18 years of age without this approval, which is an important safeguard against abuse;

Football agents are now subject to a FIFA licensing system. Obtaining a license requires passing an exam and meeting a number of ethical and formal requirements, including confirmation of knowledge of safeguarding rules. Additionally, only agents meeting specific conditions may cooperate with minor athletes—aimed at protecting their interests and reducing the risk of abuse;

The PZPN actively participates in the FIFA Transfer Matching System (TMS), which ensures transparency of all international transfer transactions and serves as a tool for verifying the flow of athletes and financial resources.

In the context of sport, globally the most vulnerable groups to human trafficking appear to be:

- Young athletes, especially those from countries with lower social or economic development, who are recruited into professional sports leagues. Within this group, young athletes may be exploited by third parties or illegal agencies;
- Migrants and people on the move, especially those attempting to build a sports career in new countries, who may become targets of human trafficking;
- Women in sport, particularly in disciplines where women are underrepresented or in countries with limited access to sport, there is a risk of sexual exploitation and human trafficking;

- Children and youth: the sports sector, especially in the context of international transfers of children, is susceptible to illegal practices related to child trafficking.

Some Polish sports associations plan to introduce appropriate procedures in the near future, often inspired by international and European sports federations.

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

Victims of human trafficking are increasingly recruited online. Recruitment takes place on social and dating platforms, as well as in messaging apps. When targeting children, perpetrators use portals or chat rooms dedicated to popular online games. Depending on the intended type of exploitation, conversations on these platforms often involve offers of "work," "modelling," "care," or "transit." Perpetrators create fake profiles on public portals and also frequently use fictitious private accounts. All conversations from public chats/portals are typically moved to private channels. The most commonly used messaging apps are encrypted or those that avoid providing information to law enforcement.

The Police, within the scope of their statutory duties, conduct operational and investigative activities to recognize, prevent, and detect crimes and offenses, including those related to human trafficking (see Article 14 of the Act of April 6, 1990, on the Police, Journal of Laws 2025, item 179). Actions taken by the Police to combat trafficking include monitoring websites associated with offers of foreign work or services offered by individuals providing sexual services. Some information is also provided by witnesses or victims themselves.

Within its activities, the National Science and Academic Computer Network (NASK), subordinate to the Ministry of Digital Affairs, apart from incidental reports resulting from responding to illegal content such as CSAM, does not identify online practices directly related to human trafficking offenses. In terms of educational activities, NASK organizes workshops in secondary schools, one of the topics being risky online contacts of various kinds or cyber threats such as cyber hygiene or risks related to the solicitation of intimate materials from minors. These activities may be considered preventive mechanisms to prevent the improper use of information and communication technologies, including for human trafficking purposes.

It is worth noting that global trends have been identified, not only relevant to Poland. The risk of human trafficking is closely linked to prostitution and the presentation of pornographic content online, with victims of trafficking often used for the creation and production of such materials. Key actions in this area are those aimed at preventing the promotion of prostitution and access to pornographic content, especially given the international calls to combat violence against women and girls.

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

One of the preconditions for raising awareness of the technology-facilitated risks is providing citizens, including children, parents, teachers and childcare professionals, with adequate digital competencies and skills. A holistic approach is crucial in the education process related to modern technologies, one that considers not only the development of technical skills but also the impact modern technologies have on students' mental and physical health. Issues such as digital hygiene, device ergonomics, and mental health prevention will be integral parts of educational activities involving digital tools.

Integration of these aspects allows for the development of a conscious, responsible, and sustainable approach to using modern technologies.

In that regard the following measures adopted in Poland are of particular importance:

- 1) The Digital Transformation of Education Policy (PCTE) - adopted by the Council of Ministers In 2024.

It is a key strategic document defining the directions of the digital transformation of Polish schools. The PCTE is aligned with the priorities established in the EU Digital Education Action Plan for 2021-2027, including:

- supporting the development of a highly effective digital education ecosystem,
- improving digital competencies and skills needed in the era of digital transformation.

The PCTE defines the goals and tools for achieving a fully digitalized education system in Poland. It describes the entire process of education transformation in Poland by 2035. It sets the framework for state policy and actions undertaken in the area of digitization of education in the short, medium, and long term and indicates the necessary actions that should be taken to fully realize the educational goals indicated in the core curriculum for general education and the vision outlined in EU and other documents, in order to prepare future generations of citizens for the challenges of a digital society related to the development of information technology and other technologies.

- 2) Government Program to Support School and Institutional Authorities in Developing Digital Skills for Children and Youth for 2025-2029 – "Digital Student" – adopted in September 2025 by the Council of Ministers.

The activities planned under the Program are intended to support teaching models that foster creativity, entrepreneurship, and empowerment in students, primarily based on project work, and to eliminate barriers related to access to education for individuals at risk of social exclusion. Supporting a creative and innovative teaching model is closely linked to ensuring access to modern technologies in the education and learning process and will have a significant impact on students' future active participation in the modern labour market. This will also provide students with better prospects for future educational choices and better preparation for life in the information society.

The main objective of the Program will be achieved through specific objectives:

- developing digital competences of students and teachers, particularly in the use of modern technologies in the teaching and learning process;
- developing social and creative competences of students, including teamwork and project-based skills;
- developing creative and entrepreneurial attitudes among students and teachers;
- supporting innovative work methods;
- utilizing teaching aids in various configurations in school practice to implement curricula using modern technologies, taking into account the diverse needs of students;
- building healthy habits related to the use of modern technologies.

- 3) Integrated Educational Platform

Integrated Educational Platform - free IT tool run by the minister responsible for education and upbringing, can be used by teachers to conduct classes and implement educational projects, and by

students for independent learning or expanding their knowledge. The platform provides free educational materials on the subject matter, enabling the implementation of the core curriculum at all stages of education.

In the above context, it is necessary to mention awareness-raising and educational campaigns by the CBZC Police and national partner organizations such as NASK. Furthermore, as part of international cooperation, CBZC participates in campaigns based, for example, on materials/infographics or videos shared by Interpol or Europol.

CBZC officers involved in prevention develop, update, and conduct training (in the form of lectures, workshops, meetings) in educational institutions. Their audience includes not only minors but also their guardians. In cooperation with other dedicated institutions, educational activities are organized for children, teaching, for example, proper online behaviour, such as: interactive CyberMocni workshops or the Pinok.IO play, which raises awareness among children about cyberworld threats, the development of artificial intelligence, and how to create responsible technologies. Additionally, CBZB regularly warns about new methods used by offenders on its social media and publishes guides for children, parents, and teachers.

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

In the current National Action Plan for the years 2025–2027, actions aimed at engaging the private sector in efforts to prevent human trafficking have not been included. However, considering the requirements stemming from the Digital Services Act, which obliges online platforms to report illegal content to law enforcement authorities, cooperation frameworks in this area will be regulated in the planned draft law on preventing human trafficking. Additionally, EU Directive 2024/1712 contains provisions that refer to the role of the private sector.

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

In the currently functioning Polish system for combating human trafficking, coordinated by the Inter-Ministerial Team for Combating Human Trafficking, the voices of trafficking victims are represented by non-governmental organizations (NGOs) participating in the work of this Team as members. Among them is, for example, the La Strada Foundation, which carries out the public task of running the National Consulting and Intervention Centre for the Victims of Trafficking. In addition, the involvement of survivors' experience in shaping national strategies (including national action plans and other reference documents) is one of the objectives adopted by the Ministry of the Interior and Administration for 2026. In this context, it seems inevitable to draw on the experiences of other countries; therefore, in September, a letter was sent to the OSCE Special Representative and Coordinator for Combating Trafficking in Human Beings, requesting OSCE support to prepare Polish stakeholders for launching discussions on the forum. Additionally, cooperation has been initiated with two academic centres to prepare a questionnaire assessing the level of support and protection provided by Poland, which will ultimately be directed—through cooperation with NGOs—to survivors.

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

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

The National Public Prosecutor's Office does not have information indicating that among identified victims of human trafficking there were individuals who became victims due to their sexual orientation and/or gender identity (LGBTI+: lesbians, gays, bisexual, transgender, or intersex persons), especially teenagers and young adults. There is also no information that such persons reported improper conduct by the Police. Similarly, the Main Border Guard Headquarters has not recorded such cases.

The Main Police Headquarters reported that data regarding gender identity or sexual orientation are not included in the information collected by the Police during the victim identification process. However, taking into account the context of ongoing proceedings, no cases of exploitation based on the mentioned criteria have been recorded.

The La Strada Foundation, which carries out the task of running the National Consulting and Intervention Centre for the Victims of Trafficking, recorded one transgender person, a Polish citizen, who returned to Poland from Sweden, where she was a victim of sexual exploitation. There was no report from this person regarding improper conduct by the Police.

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

In Poland, there is an organized nationwide Network of Assistance for Victims of Crime. Within this network, Regional Centres and Local Assistance Points operate, providing support to victims throughout the country. The current Network of Assistance for Victims, planned for the years 2022–2025, is operational, and a competition for its continuation in 2026 has already been announced. Assistance provided through this network is financed from the Fund for Victims and Post-Penitentiary Assistance – the Justice Fund.

The Border Guard undertakes multi-level actions to positively identify potential victims of human trafficking among all social groups, particularly among migrants seeking employment who may be exploited in forced labour. For this purpose, numerous checks on employment legality are carried out in accordance with the Border Guard's competences, both regarding the performance and assignment of work. If symptoms characteristic of forced labour exploitation are detected, further procedures are initiated according to the applicable Algorithms. The Border Guard closely cooperates with Polish authorities, such as the Police and the State Labour Inspection, as well as with international bodies and institutions (e.g., IOM) and NGOs such as La Strada Foundation against Human Trafficking and Slavery.

The Police have procedures allowing for the identification of victims among all citizens. Based on these competences, checks are conducted on the basis of their own intelligence and information provided by NGOs, in selected locations or companies suspected of human trafficking or labour rights violations. Spot checks are additionally supported annually by large-scale inspections of workplaces and places where foreigners, migrant workers, or persons with irregular status stay, carried out as part of Police and Border Guard participation in the European-wide EMPACT - EAD (European Action Days) Labour Exploitation operations, aimed at combating human trafficking for forced labour. Inspections are conducted jointly with labour inspectors who have the broadest authority, ensuring their thoroughness. These inspections cover not only workplaces of foreigners but also recruitment agencies or temporary employment agencies. Given that, State Labour Inspection (PIP) employees, as part of fulfilling tasks under the National Action Plan against Human Trafficking, have undergone training and projects strengthening their ability to detect forced labour cases, during joint inspections

they are able to accurately identify labour code violations and pay attention to indicators of possible human trafficking.

Police cooperation with the State Labour Inspection in combating human trafficking crimes is based on an agreement dated December 11, 2000, between the Chief Labour Inspector and the Police Commander-in-Chief regarding the principles of cooperation between the State Labour Inspection and the Police. The parties committed to cooperating in preventing crimes against the rights of employees, labour law violations, and other related offenses. This cooperation is realized through mutual information sharing, coordination of actions, joint activities against perpetrators, and participation in meetings and consultations regarding matters within the scope of cooperation.

Under national regulations, every person identified as a victim of human trafficking receives rights as a crime victim. Cooperation is carried out both at the national level, within the Inter-Ministerial Team for Combating Human Trafficking operating under the Ministry of the Interior and Administration, and at lower levels within Regional Teams.

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

Numerous multi-channel information and prevention campaigns are conducted, aiming not only to raise general awareness about human trafficking but also to inform about the rights of victims, perpetrators' methods, and available forms of support.

These activities are directed at identified risk groups, meaning that materials are distributed in places where potential victims may be present or seek employment, as well as online, on platforms used by job seekers.

A key element is ensuring the availability of materials in foreign languages. Given that foreigners are most frequently victimized, all key informational materials—such as leaflets, posters, brochures, and online videos—are translated into the languages of the countries of origin of the risk groups.

In all preventive materials and campaigns, contact details for the National Consulting and Intervention Centre for the Victims of Trafficking (KCIK), especially the 24-hour emergency hotline, are prominently displayed.

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

When a potential victim of human trafficking is identified, regardless of whether the incident occurred within the territory of the Republic of Poland or at the state border, including situations related to the submission of an application for international protection, Border Guard officers are obliged to follow the procedures set out in the *Algorithm of Conduct of Law Enforcement Officers in Case of Revealing a Crime of THB* and in the *Algorithm for Identifying and Dealing with a Minor Victim of Human Trafficking for the Police and Border Guard officers* which include, among others, notifying the territorial coordinator for human trafficking issues.

At the Office for Foreigners, the "Procedure for Office for Foreigners Staff Handling Applications for International Protection in the Event of Preliminary Identification of a Foreigner as a Victim of Human Trafficking" has been adopted. According to the current procedure, Office staff handling applications for international protection or providing social assistance to applicants are required to check, based

on developed identification indicators, whether the foreigner may be a victim of human trafficking. This is called informal identification, as Office staff do not have the authority for formal identification of human trafficking victims. If there is a suspicion that the applicant may be a victim of human trafficking, information about the preliminary identification is passed to law enforcement agencies—the Operational and Investigative Department of the Main Border Guard Headquarters—which carries out formal identification of the potential victim. The applicant is informed by Office staff about the possibility of support from the National Consulting and Intervention Centre for the Victims of Trafficking, and if consent is given, their data are forwarded to the KCIK.

23. What measures are taken in your country to identify victims of THB in immigration detention centres and prisons?

In relation to detention centres within the organizational structure of the Border Guard, which serve to secure the stay of foreigners during administrative proceedings related to return decisions or applications for international protection in Poland, it should be noted that foreigners during these proceedings have access to representatives of non-governmental organizations providing free legal assistance (including the Legal Intervention Association, Helsinki Foundation for Human Rights, Halina Nieć Legal Aid Centre, and UNHCR), as well as external entities (IOM, Caritas) conducting various activities. NGO representatives may always report suspicion of identifying a potential victim of human trafficking to the Border Guard coordinator for appropriate assistance. Furthermore, the Border Guard itself has established special procedures for such situations and acts in accordance with the “Guidelines for Border Guard Procedures Regarding Foreigners Requiring Special Treatment,” which also apply to potential victims of human trafficking.

If there is suspicion that a foreigner is a victim or witness of human trafficking, a Border Guard officer or NGO representative immediately notifies the designated coordinator to initiate further actions. These procedures are described in frequently referenced documents such as the *Algorithm of Conduct of Law Enforcement Officers in Case of Revealing a Crime of THB* and the *Algorithm for Identifying and Dealing with a Minor Victim of Human Trafficking for the Police and Border Guard officers*.

In 2023, the Penitentiary Bureau of the Central Board of the Prison Service organized a specialist training entitled “Combating Human Trafficking in the Context of Assistance in Safe Return to Society after Serving a Sentence,” attended by dozens of Prison Service officers. The training aimed to prepare penitentiary staff to conduct educational initiatives and rehabilitation programs for inmates regarding the prevention of human trafficking. In this area, the Prison Service is supported, among others, by NGOs. For several years, in selected penitentiary units, the “Freedom Time” Foundation, in cooperation with the Prison Service, has been implementing the project “Don’t Let Yourself Be Bought, You’re Not for Sale.” Within the project, training on preventing human trafficking is conducted for women held in penitentiary isolation. The project is financed from the Justice Fund, administered by the Minister of Justice.

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

- a. persons with disabilities;
- b. LGBTI+ persons;
- c. victims with children;
- d. victims with severe mental and physical trauma;
- e. homeless persons;
- f. other.

Article 68 of the Constitution of the Republic of Poland imposes on public authorities the obligation to ensure all citizens equal access to healthcare services financed from public funds. Both the Ministry of Health and the National Health Fund systematically monitor the availability of guaranteed healthcare services financed from public funds. Separate issues remain factors limiting access to services, such as insufficient funding or limited medical personnel resources.

The rules and procedures for granting social assistance benefits are regulated by the Act of 12 March 2004 on Social Assistance. Social assistance is provided in various forms, both monetary (e.g., periodic or targeted benefits) and non-monetary (e.g., material aid, meals), with eligibility depending on meeting specific criteria. Support for individuals needing help in daily functioning, including persons with disabilities, is provided through services such as care services (including neighbourhood care), specialized care services at home, specialized services in support centres for persons with mental disorders (community homes or self-help clubs), stays and services in training or supported housing. For round-the-clock care for persons requiring assistance, social care homes and family care homes operate.

Individuals and families in crisis situations receive support in the form of crisis intervention. The aim of crisis intervention is to restore psychological balance and the ability to cope independently, thereby preventing the transition from a crisis reaction to chronic psychosocial dysfunction. Crisis intervention covers individuals and families regardless of income. Within crisis intervention, immediate specialist psychological help is provided, and, depending on needs, social or legal counselling, and, in justified cases, shelter for up to three months. Mothers with minor children and pregnant women experiencing domestic violence or other crisis situations may find shelter and support in homes for mothers with minor children and pregnant women. Fathers with minor children or other persons exercising legal custody over children may also be admitted to these homes. Article 7, point 7a of the *Social Assistance Act* lists the need for protection of victims of human trafficking as one of the grounds for granting social assistance. Individuals entitled to social assistance benefits (i.e., Polish citizens with residence and presence in the territory of the Republic of Poland, as well as other persons listed in Article 5 of the Act) who need help due to meeting this criterion may be covered by support from the social assistance system on general terms. The type, form, and amount of benefit should be appropriate to the circumstances justifying the provision of assistance. Additionally, Article 5a of the *Social Assistance Act* entitles foreigners who are victims of human trafficking (holding the appropriate certificate or permit) to receive social assistance in the form of crisis intervention, shelter, meals, necessary clothing, and targeted benefits.

In Poland, the Fundusz Pomocy Pokrzywdzonym oraz Pomocy Postpenitencjarnej – Fundusz Sprawiedliwości (Fund for Victims and Post-Penitentiary Assistance – Justice Fund) was established as a state-purpose fund. The Minister of Justice is the fund's administrator. The main tasks of the Justice Fund include providing assistance to victims of crime, witnesses, and their closest relatives, as well as post-penitentiary support. Assistance financed from the Justice Fund is delivered through non-governmental organizations forming the nationwide Network of Assistance for Victims of Crime. Within this network, Regional Centres and Local Assistance Points operate. Additionally, emergency help can be obtained by contacting the 24-hour Victim Support Line. Support is available if the person has been victimized as a result of a crime. Victims of crime can contact one of the assistance locations. The list of all facilities providing support is available on the Ministry of Justice website, in the section dedicated to the Justice Fund: <https://www.funduszsprawiedliwosci.gov.pl/pl/znajdz-osrodek-pomocy/>.

On this website, it is possible to find the address, opening hours, and phone number of the nearest assistance facility. Contact can be made by phone, email, or by visiting the chosen facility. Information about the nearest point of assistance can also be obtained by contacting the 24-hour Victim Support Line at: 48 222 309 900 or by email: [info@numerosos.pl](mailto:info@numerosos.pl).

An organization worker (first contact person) will conduct an interview with the victim. Based on the collected information, it will be determined what type of assistance the victim of crime can receive and what steps are needed to obtain it. Assistance may include:

- Legal help, including free advice and mediation (a method of resolving disputes with the support of a neutral mediator);
- Help in obtaining legal advice, including foreign language interpretation if the person does not speak Polish well;
- Sign language interpreter, if the person communicates in sign language;
- Guide-interpreter, if the person is deafblind;
- Psychological, psychiatric, and psychotherapeutic support;
- Assistance from the first contact person;
- Material support necessary to cover costs, in particular:
  - Healthcare services, medicines, medical devices, dressings, orthopaedic aids, and assistive devices necessary for treatment resulting from injury sustained due to crime or its consequences;
  - Education in public schools and kindergartens;
  - Childcare in nurseries and children's clubs run by municipalities;
  - Training and courses to improve professional qualifications and exams confirming professional qualifications;
  - Temporary accommodation or shelter;
  - Periodic subsidies for ongoing rent and utility payments (heating, electricity, gas, water, waste removal) for a residential unit or single-family home;
  - Adaptation of the residential unit or single-family home to the needs of the crime victim if loss of physical ability resulted from the crime;
  - Public transportation or transport related to obtaining help from the Fund;
  - Food or food vouchers;
  - Purchase of clothing, underwear, shoes, cleaning and personal hygiene products;
  - Organized trips for eligible minors;
  - Trips for eligible persons together with minors under their care or minors with the person under whose care they are, during which support is provided;

- Construction works, including preparation for the works, especially costs of preparing project documentation, preparing the ground for construction, expert opinions, certificates, operations, geological works;
- Purchase of equipment and furnishings;
- Purchase of intangible assets and rights.

The type of assistance granted is determined by specialists at the facility, based on an analysis of the case and relevant legal provisions. When proposing support, specialists assess how the effects of the crime can be minimized. Given the diversity of situations presented by beneficiaries, each case is considered individually. It is important to remember that assistance from the Justice Fund is not financial—beneficiaries do not receive cash payments.

To obtain assistance, the following steps must be taken:

- Complete the application for assistance in full;
- Submit documents confirming the circumstances indicated in the application (if documents are missing, the first contact person at the facility will conduct an interview to verify the victimization);
- Provide consent for the processing of personal data.

In addition to the network, three Specialist Support Centres—Centres for Children's Assistance—have been established (in the Silesian, Subcarpathian, and Lubusz regions). These centres offer support to children experiencing violence, neglect, trauma, and their families. Their activities aim to prevent harm to children, improve their psychological well-being, and provide social education.

Groups eligible for support include:

- Children victimized by physical, psychological, or sexual crimes, or in psychological or suicidal crisis;
- Children experiencing trauma, neglect, or domestic violence;
- Ukrainian children and their families (especially since the outbreak of war);
- Parents and caregivers—accessing specialist consultations;
- Professionals (teachers, healthcare workers, social workers)—participating in educational and preventive activities.

The range of activities provided by these centres includes:

#### 1. Specialist services:

- First contact duty;
- Psychological, psychotherapeutic, pedagogical, legal, psychiatric, paediatric support;
- Speech therapy, child coaching, family mediation, neurotactile therapy;

- 
- Interdisciplinary support integrating psychological, legal, social, and medical assistance in one place.
2. Educational and developmental activities:
    - Workshops for children developing soft skills (stress management, communication, assertiveness);
    - Psychoeducational groups for children and parents;
    - Educational and preventive campaigns for parents, teachers, and the local community;
    - Conferences, trainings, and informational actions.
  3. Social promotion and integration:
    - Leaflets, posters, radio and online spots, sponsored articles;
    - Family picnics on Children's Day;
    - Press conferences and social media activities.
  4. Operation of CPD facilities:
    - Adaptation and equipping premises according to standards;
    - Maintenance of facilities (rent, utilities, security, cleaning);
    - Website management and equipment upgrades.
  5. Project management and evaluation:
    - Employment of project teams (manager, assistant, accountant/financial coordinator);
    - Office and documentation management;
    - Annual evaluation of activities and project outcomes.

The network of assistance points is complemented by a nationwide 24-hour helpline, allowing access to help from psychologists, lawyers, and interpreters, as well as information about the nearest assistance location based on place of residence. The helpline provides information in Polish, foreign languages (English, Ukrainian, Russian), and sign language.

Contact with the helpline is possible via:

- Phone number +48 222 309 900;
- Email: [info@numerosos.pl](mailto:info@numerosos.pl);
- Chat and video call on [numerosos.pl](https://numerosos.pl).

The Ukrainian-language helpline is available on Wednesdays from 18:00 to 22:00, and the Russian-language helpline on Tuesdays from 18:00 to 22:00. Additionally, under the Act of 5 August 2015 on free legal aid, free citizen counselling, and legal education, access to free legal aid and free citizen counselling is ensured. The right to these services applies to individuals unable to afford paid legal assistance, including self-employed individuals who have not employed others in the past year. Under these conditions, people with disabilities, LGBTI+ individuals, victims with children, victims with serious psychological or physical injuries, and homeless persons may benefit from free support.

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

One of the tasks of the National Consulting and Intervention Centre for the Victims of Trafficking is to assist victims of human trafficking in their reintegration process. The reintegration process for people harmed by human trafficking begins with a needs assessment, covering their personal, health, and social situation. Based on this, an individual support plan is developed, tailored to the specific needs of the person. Assistance may include psychological, legal, medical, and housing support, as well as help obtaining social benefits. In the area of vocational activation, we offer support in preparing application documents (CV, cover letter), job searching, and activities that promote independence and returning to the labour market.

For foreigners, a crucial element is support in the residency legalization process—from helping fill out applications, accompanying them during visits to offices, to assistance in collecting residence permits.

A key procedure used by the Foundation La Strada, which carries out the public task of operating the National Consulting and Intervention Centre for the Victims of Trafficking (KCIK), is working within a *case management system*. Every person who starts cooperation with the Foundation is assigned a case manager—a dedicated staff member responsible for handling their case. The case manager coordinates all support activities, monitors progress at every stage, and ensures consistency of actions taken. Thanks to this, the person receiving help always knows whom to turn to. This approach eliminates scattered responsibility, ensures continuity of support, and significantly increases the effectiveness of the reintegration process.

The *case management system* is a proven and effective method that allows an individualized approach to each person, builds a relationship based on trust, and effectively supports the return to independent and safe living.

According to Article 334, paragraph 1 of the amended Act of December 12, 2013, on Foreigners, the Chief Commander of the Border Guard is the sole authority organizing assistance to foreigners for voluntary return. Simultaneously, under Article 335a, paragraph 1 of the same Act, the Chief Commander of the Border Guard may provide assistance in maintaining and reintegrating the foreigner in the country to which the foreigner has returned, hereinafter referred to as "reintegration assistance."

In accordance with Article 334, paragraph 2, point 6 of the cited Act, assistance in voluntary return may be granted to a foreigner residing in the territory of the Republic of Poland based on the certificate referred to in Article 170 or a temporary residence permit referred to in Article 176.

At the same time, the provisions of the Act enable the delegation of activities in organizing voluntary return and providing reintegration assistance to entities whose statutory duties include organizing voluntary returns. This solution allows for implementing these activities through cooperation with the International Organization for Migration (IOM).

Due to the changes introduced in the Act, victims of human trafficking can apply to participate in the voluntary return program supported by the International Organization for Migration (IOM), which also provides reintegration support. In such cases, returnees are entitled to a cash allowance to cover basic needs during travel or immediately upon arrival in their home country. Additionally, all returnees have the right to material reintegration assistance, which is closely coordinated with the local IOM missions in the countries of return. Reintegration support includes various forms, including business grants for individuals planning to start economic activities. These enterprises often operate in sectors such as agriculture, gastronomy, crafts, food and beverage sales, technical services, courier activities, and animal husbandry.

Educational grants are also available to finance vocational training programs.

For individuals in difficult situations, the reintegration grant may be allocated for treatment or to cover basic living expenses.

In some countries, such as Venezuela, due to complex and difficult conditions, reintegration assistance is provided in the form of cash support, sometimes through local partners (if IOM offices are not present in the area). Such solutions are usually determined by political and operational challenges that hinder standard material assistance.

Every assistance plan is adjusted to the individual needs of beneficiaries, developed in close cooperation with IOM missions in the country of origin, and carefully assessed to ensure effective support.

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

According to Article 181 of the Act on Foreigners, a temporary residence permit can be granted to a foreigner who is staying in the territory of the Republic of Poland if:

- 1) they are obliged to personally appear before a Polish public authority, or
- 2) the foreigner's presence in the territory of the Republic of Poland is required due to their exceptional personal situation, or
- 3) the foreigner's presence in the territory of the Republic of Poland is required for the interest of the Republic of Poland.

This permit can be granted for the period necessary to fulfil the purpose for which it was issued, but not longer than 6 months. It can also be granted when the circumstances for applying do not justify the foreigner's stay in Poland for a period longer than 3 months.

The application for this permit can be submitted even after the expiration of the foreigner's legal stay in Poland.

The above provision is not specifically targeted at foreigners who are victims of human trafficking, but such individuals can also apply for this permit, especially if they do not meet the requirements for a temporary residence permit for victims of human trafficking who have cooperated with competent authorities conducting proceedings related to the crime of human trafficking referred to in Article 189a §1 of the Penal Code (the permit referred to in Article 176 of the Act on Foreigners).

For obtaining a temporary residence permit due to circumstances requiring a short-term stay of the foreigner in Poland, as mentioned in Article 181 of the Act on Foreigners, if the foreigner's presence is required because of an exceptional personal situation, the applicant should demonstrate that such an exceptional personal situation exists, necessitating a short-term stay in Poland. Such a situation may be related, for example, to the health condition of the person or the need to handle important personal matters in Poland under exceptional factual circumstances.

In the judgement of the Supreme Administrative Court dated December 29, 2016 (II OSK 750/15), it was stated that the condition for applying Article 181 section 1 point 2 of the 2013 Act on Foreigners is the existence of a personal situation of the foreigner that can be described as exceptional (extraordinary). The recognition of such an exceptional personal situation should result from an objective assessment of the applicant's situation, and not from their subjective evaluations or beliefs.

In the judgement of the Voivodeship Administrative Court in Warsaw dated July 3, 2017 (IV SA/Wa 1024/17), the court stated that the purpose of the solution adopted in Article 181 of the 2013 Act on Foreigners (modelled after the solution in the 2003 Act on Foreigners) is to legalize only short-term stays of foreigners when they find themselves in exceptional situations and their stay in Poland is justified on humanitarian or accidental grounds beyond their control. The provision in Article 181 section 1 of the 2013 Act on Foreigners is not intended to legalize longer-term stay.

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

In terms of ensuring identity protection, it should be noted that the protection of the right to privacy is guaranteed by Article 47 of the Constitution of the Republic of Poland. Its development is found in various procedural criminal law provisions. Presenting general regulations regarding the obligation of anonymization contained in the provision of Article 148a of the Code of Criminal Procedure, it should be indicated that there is a general rule according to which the protocol of activities involving both the victim and the witness does not include data concerning their place of residence and place of work, as well as telephone number, fax number, or email address; these data are included in an attachment to the protocol.

According to Article 148a §1 of the Code of Criminal Procedure, in the protocol of (EVERY) activity involving both the victim and the witness:

- data concerning the place of residence, place of work, telephone number, fax number, or email address of victims and witnesses participating in the activity are not included;
- these data are included in an attachment to the protocol.

Data concerning the place of work are not subject to anonymization when:

- 1) the participating witness is a public official;
- 2) the participating witness testifies in connection with their official function;
- 3) there is no circumstance that for the good of criminal proceedings the witness's place of work should not be revealed in the protocol.

The provisions do not imply that persons accompanying the activity are protected analogously. For practical use of the institution of a person adopted by the victim, it is worth considering applying standards analogous to those for witnesses.

Collections of other protected documents, referred to in Article 148a §3, should include:

- 1) attachments to protocols;
- 2) other documents containing protected data (in original); copies deprived of identifying characteristics are kept in the main case files.

It is possible to waive the anonymization obligation (requires an order):

- if the data concerning residence, place of work, phone, fax, or email address of the victim or witness are known to the accused;
- regarding data concerning residence, work, phone, fax, or email of the victim or witness if these data relate to the place of business activity of the victim or witness and have been disclosed to the public in the appropriate register or records;
- due to an obvious lack of need to protect these data because of the nature of the case.

These guarantees concern the disclosure of identity to the parties in proceedings and are of a general nature. In special cases, total anonymization of the victim's identity is possible. According to Article 184 §1 of the Code of Criminal Procedure, if there is justified fear of danger to the life, health, freedom, or significant property of the witness or their closest person, the court, or in preparatory proceedings the prosecutor, may issue a decision to keep secret circumstances allowing the witness's identity to be revealed, including personal data, if they do not matter for case resolution.

Generally, according to Article 13 section 2 of the Press Law Act of January 26, 1984 (Journal of Laws No. 5, item 24 as amended), it is forbidden to publish in the press the image and other personal data of persons against whom preparatory or court proceedings are conducted, as well as the image and personal data of witnesses, victims, and injured parties, unless these persons consent.

According to Supreme Court rulings, the publishing ban on personal data (including victims) under Article 13 section 2 applies from the moment of actual initiation of preparatory proceedings under Article 308 of the Code of Criminal Procedure (Supreme Court ruling of March 8, 2017 IV CSK 254/16).

In summary, Poland has specific legal measures to protect the personal data of all crime victims regardless of age, gender, citizenship, etc., and violation of confidentiality in preparatory proceedings on this matter is subject to legal sanction under Article 241 of the Penal Code. Data protection includes, among others, the victim's name, address, image, voice, and other data enabling identification.

During official duties, Border Guard officers are obliged to maintain official secrecy, and breaches may result in disciplinary and/or criminal liability.

In the context of minors, a minor victim of human trafficking is granted special protection under Polish law, including prohibition of multiple hearings, hearings conducted before a court with a psychologist expert, and recorded by sound and image devices. Hearings are usually one-time to minimize trauma.

Minors receive special protection in criminal proceedings: hearings are one-time, in a safe and friendly place (Articles 185a–185c of the Code of Criminal Procedure). Recording of hearings is allowed (Article 147 § 2a KPC). Anonymity or testimony as an anonymous witness (Article 184 KPC) or testimonies in the absence of the accused for psychological comfort (Article 390 §§ 2–4 KPC) is possible.

Further protection of a minor's identity during Police proceedings includes a ban on publishing the child's name, surname, address, or image (Press Law, Journal of Laws, 2018, item 1914, Article 13, paragraph 2, and the Act of May 10, 2018, on Personal Data Protection), and the use of initials, case

numbers, or pseudonyms in place of full details. Due to the circumstances and the child's best interests, many cases or interventions conducted by the Police are not released for publication in the media. Information remains solely with those conducting the proceedings or proceedings. These actions are possible thanks to the existing confidentiality obligation of Police officers regarding their official duties (official secrets), a breach of which carries legal and disciplinary consequences.

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

In Poland, the protection of the private life and identity of victims is among the responsibilities of the Commissioner for Human Rights (Rzecznik Praw Obywatelskich), who contributes to encouraging the media to respect and protect victims of human trafficking, including the protection of their private life and identity through the following activities:

- 1) speeches for the press, radio, and television;
- 2) organizing conferences at the Office of the Commissioner for Human Rights to promote important issues in this area (including media dissemination), as well as participating in similar external events;
- 3) providing informational brochures and articles;
- 4) holding meetings with representatives of national and international bodies and institutions;
- 5) visiting and taking direct initiatives at places where victims of human trafficking stay to highlight challenges in ensuring victim protection;
- 6) addressing general appeals to relevant institutions containing the need for legislative changes in the protection of victims' private life and identity.

Additionally, according to information provided by the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych), the following measures and methods are used in Poland to encourage media to protect the privacy and identity of victims:

1. Direct interventions by the Supervisory Authority:
  - The President sent letters to the heads of all public radio companies, emphasizing the need to implement internal procedures and policies that protect the rights of data subjects, including victims of crimes;
2. Reminding about legal obligations (GDPR - RODO):
  - Despite certain exemptions when creating press materials, journalists are still obliged to ensure data security and assess risks of violating individuals' rights or freedoms.
  - The supervisory authority reminded about the obligation under Article 24 GDPR to implement and update appropriate technical and organizational measures, including data protection policies when proportionate.
  - Article 32 GDPR obligations regarding security of processing must be followed to protect victims from irreversible harm, including setting employee duties, protection rules, security methods, and confidentiality obligations;
3. Educational and sensitization activities:
  - The Data Protection Office actively educates media about personal data protection, especially concerning large-scale EU information systems, which is particularly relevant for victims of human trafficking who often appear in databases like SIS. These activities

include publications and interviews aiming to sensitize media to the need for special protection of victims' privacy.

Another institution active in this area is the Commissioner for Human Rights, who encourages media to protect victims' privacy by publicly exposing violations, monitoring state actions at borders and detention centres, and, importantly, making general appeals demanding concrete legislative changes to legally strengthen victims' identity protection in the public sphere.

Examples of the Commissioner's activities include:

- Exposure of victim data in wanted persons lists: In March 2025, the Commissioner addressed a general appeal to the Minister of Justice about the problem of revealing full data of victims in publicly available wanted lists. The Commissioner argues that the current practice, explained by the lack of anonymization prohibition in Article 280 of the Code of Criminal Procedure, is unnecessary for achieving the wanted list's goal and violates the dignity and right to privacy of victims;
- Protection of minors (the so-called Kamilek Act): The Commissioner for Human Rights supported the amendment to the Act on Counteracting Sexual Crime Threats, which introduces the obligation to vet individuals working with children for sexual and violence-related crimes (including human trafficking). On April 30, 2025, the Commissioner also resubmitted comments to the Minister of Justice on the draft act amending the Act on Counteracting Sexual Crime Threats and Protecting Minors and certain other acts (Government Form UD 176).<sup>46</sup> The amendment also aimed to introduce obligations for hotel and tourist service providers, as well as those operating other collective accommodation facilities, to the extent necessary to ensure the protection of minors, including against the potential threat of human trafficking, for example through rules and procedures for identifying minors staying in hotel facilities and their relationship with the adult with whom they are staying in the facility; rules and procedures for responding in the event of a reasonable suspicion that the well-being of a minor staying in a hotel facility or using tourist services is at risk.
- Protection of unaccompanied minor foreigners: In an October 2024 joint statement with the Commissioner for Children's Rights, the Commissioner noted systemic gaps in protecting this highly vulnerable group, pointing out lack of proper legal representation (custodian), insufficient foster care places, flawed age assessment mainly based on wrist X-rays, and detention of minors;
- Photographing foreigners' faces: In January 2025, the Commissioner intervened with the Commander of Operation "Safe Podlasie" regarding reports about soldiers photographing foreigners' faces, questioning the legal basis for such data processing.

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

Since January 1, 2023, there have been no recorded cases of employment by members of the Polish foreign service of individuals as domestic staff under conditions that could be considered forced labour or human trafficking. Regarding cases of human rights violations by members of diplomatic missions of foreign states (including consular offices and representations of international organizations) in Poland, in the context of persons who are not Polish citizens or do not have permanent residence in Poland, employed as domestic helpers, it should be emphasized that employing such persons is carried out based on procedures developed in April 2014 jointly with the Organization for Security and Co-operation in Europe (OSCE), the La Strada Foundation, the Helsinki Foundation for Human Rights, and the International Organization for Migration. These procedures are available in the Handbook for diplomatic missions posted on the Ministry's website and in publications of the Special Representative for Combating Human Trafficking.

Regarding non-compliance by foreign diplomats in Poland with labour law and the above procedures, since 2023 there have been 7 cases of irregularities mainly concerning:

- 1) lowering wages below the minimum wage set by Polish labour law;
- 2) late payment of wages;
- 3) unjust payment of wages reduced by fees and taxes contrary to Article 37(4) of the Vienna Convention on Diplomatic Relations of April 18, 1961;
- 4) disregard for working and rest hours;
- 5) demands for work during overtime and days off without additional pay;
- 6) lowering health insurance contributions.

The Ministry of Foreign Affairs collects data on the number of foreigners employed as domestic helpers by foreign diplomats (currently 32 as of September 12, 2025), mainly from the Philippines, Indonesia, Bangladesh, and Pakistan. Employers are mostly members of diplomatic missions from Arab states: Saudi Arabia, Kuwait, and the United Arab Emirates.

To prevent irregularities potentially amounting to human trafficking, the procedures require that the issuance of a visa for a person planning to be employed as a domestic helper by a foreign diplomat in Poland depends on a contract that ensures worker protection not less than that under Polish labor law. Employment must include insurance and a bank account for wage payments. Employers must also provide funds for the employee's return to their place of permanent residence after contract expiration.

Furthermore, issuance of an identity card allowing residence in Poland for employment as a domestic helper by a foreign diplomat requires an annual visit to the Ministry of Foreign Affairs to provide information on working conditions. During such meetings, domestic helpers are informed of labor rights and given contact details of help institutions in case of rights violation.

The Ministry's Diplomatic Protocol also maintains a network of contacts— with consent — between domestic helpers employed within the same foreign mission to exchange information, maintain social contacts, and assist in crises. Identity cards are handed out during meetings at the Ministry, where working and living conditions are assessed. If no concerns arise, the document legalizing stay is provided. If issues like unpaid overtime arise, the embassy is called to correct them, and the identity card is withheld until proof of correction is provided, followed by a confirmation meeting.

Additionally, the Diplomatic Protocol, together with the National labour Inspection, has developed a sample employment contract recommended for missions and employers to minimize risks of contracts inconsistent with the Labour Code.

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

The main source of information on migration, including organized crime such as human trafficking, is the border section with Belarus. Since 2021 (due to increased migrant flow at this section with the consent of Belarusian services), detailed statistics have been kept on people crossing the border, including nationality, regions of origin, ways to reach the Belarus-Poland border, and methods used by human smuggling organizers.

To identify and combat human trafficking, Internal Security Agency (ABW) officers conducted around 2,000 interviews with migrants, which allowed for:

- identification of several hundred smugglers/organizers/guides and dozens of intermediary offices — smuggling hubs and hawala transfers;
- identification of human trafficking routes to EU countries and the United States;
- obtaining documentation related to Belarusian and Russian state actors involved in smuggling to the EU;
- identifying airlines participating in the trafficking, including pilots' data;
- collecting testimonies from some migrants or their companions who were exploited for slave labour, including in Germany;
- identifying various smuggling gangs/groups involved in organizing human trafficking (active in origin regions and EU states), including Nigerian, Arab, and Afghan groups.

Additionally, the Internal Security Agency actively cooperates with partners in multilateral forums set up to combat international terrorism, the US FBI, Border Guards, and Military Gendarmerie in related investigations. Identification of individuals connected to extreme left-wing circles involved in human trafficking, sometimes against their will, is ongoing.

Criminal groups smuggling foreigners from Bangladesh, India, and Pakistan for slave labour demanding tens of thousands of euros for help crossing into the EU have been identified. This information contributed to suspending visa issuance by the Ministry of Foreign Affairs to certain entities.

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

The issue of removing illegal online content (including content amounting to crimes and offenses such as human trafficking) by internet service providers and a range of responsibilities related to content administration are regulated by the EU Digital Services Act (DSA), an EU regulation directly applicable in member states, which came into force on February 17, 2024. In February 2024, the Ministry of Digital Affairs appointed the Office of Electronic Communications (UKE) for this role. In Poland, a draft

amendment to the Act on the Provision of Electronic Services and some other laws aims to create organizational and legal frameworks to implement the DSA regulations. It proposes relevant procedures and establishes competent authorities, including a coordinator for digital services. The amendment also foresees the introduction of provisions on financial penalties for non-compliance. According to the DSA, the implementing country must designate an office/institution to coordinate the implementation of the Digital Services Act. The draft proposes a procedure in which the UKE president issues blocking orders for content violating personal rights or constituting prohibited acts. This focuses solely on assessing the legality of the content, not on determining the responsibility of the user who published it. Although the official European Commission website lists codes of conduct for content covered by DSA regulations, signed by major online platforms, none of these specifically address combating content related to human trafficking.

Victims of human trafficking can seek support and help from various institutions—both governmental and non-governmental. A victim or witness of such a crime can contact helplines or state services and institutions via dedicated hotlines or email addresses. Additionally, Poland operates the National Consulting and Intervention Centre for the Victims of Trafficking for Victims of Human Trafficking, which provides comprehensive assistance—from ensuring safety, accommodation, medical help to legal consultations with adaptations for communication barriers (e.g., language differences between the victim and officials).

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

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

The abuse of particular vulnerability ("vulnerability") is not a characteristic of the crime of human trafficking and is not defined in criminal law.

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

Despite the lack of a formal definition, when imposing a sentence under Article 53 § 2 of the Criminal Code, the court takes into account, among other things, the perpetrator's motivation and behaviour, especially when the crime is committed to the detriment of a person who is helpless due to age or health condition. Furthermore, Article 53 § 2a of the Criminal Code states that aggravating circumstances include, in particular: exploiting the victim's helplessness, disability, illness, or advanced age; committing the crime in cooperation with a minor or by involving a minor.

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

It must be demonstrated that the accused knew or should have known about the victim's particular situation.

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

The concept of "abuse of particular vulnerability" was not explicitly (defined) addressed in criminal law training sessions organized by the National School of Judiciary and Public Prosecution in recent years. Nevertheless, the training materials included references to related issues. Among the topics covered were:

- A directive for judges concerning the protection of especially vulnerable victims, such as children or persons with disabilities.
- The EU Framework Decision 2002/629/JHA of July 19, 2002, on combating trafficking in human beings, which in Article 3(2) provides for a higher penalty (minimum 8 years) when the crime was committed against a particularly vulnerable victim.
- The Directive of the European Parliament and of the Council 2011/36/EU of April 5, 2011, on preventing and combating trafficking in human beings and protecting its victims, replacing Framework Decision 2002/629/JHA, which in Article 4(2) prescribes a penalty of at least 10 years' imprisonment if the crime was committed against a victim who was particularly defenceless, which, in the context of this directive, includes victims who are children.

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

The Act of November 28, 2014, on the protection and assistance for the injured party and the witness (Journal of Laws of 2015, item 21) introduced into national law two directives of the European Parliament and Council: 2012/29/EU of October 25, 2012, establishing minimum standards on the rights, support and protection of victims of crime, replacing Framework Decision 2001/220/JHA (Journal of Laws EU L 315 of 14.11.2012, p. 57) and 2011/99/EU of December 13, 2011, on the European protection order (Journal of Laws EU L 338 of 21.12.2011, p. 2). Legal literature indicates that national provisions are more favourable than those specified in the directives for victims regarding the prevention of secondary victimization. Moreover, the rights of victims are included in the Code of Criminal Procedure. Below are listed legal mechanisms aimed at ensuring broad safety for the witness (injured party):

- Maintaining confidentiality of circumstances that facilitate revealing the witness's identity, including personal data, unless relevant to the case decision (Article 184 of the CCP), i.e., the institution of the so-called anonymous witness.
- Conducting a line-up in a way that prevents the person being questioned from being recognized by the person identifying them (Article 173 § 2 of the CCP).
- Presence of another/third person during the evidentiary act of questioning the injured party:
  - The right to appoint a legal representative (Article 87 § 1 and 2 of the CCP).
  - Questioning a minor witness preferably in the presence of their legal guardian or actual caregiver (Article 171 § 3 of the CCP).
  - The presence of a person indicated by the injured party during actions involving them (Article 299a § 1 of the CCP).

- Special procedure for questioning witnesses of sexual crimes and crimes committed with violence (Articles 147 § 2a, 185a–185d of the CCP).
- Questioning in the absence of the accused if their presence could intimidate the witness's testimony (Article 390 § 2 of the CCP).
- Anonymization of data of the injured party, witness, or a witness who is a public official—protocol, address annex (Article 148a of the CCP).
- The formulating of questions asked to the witness as specified in Article 191 § 1b of the CCP (as a way of protecting the witness against revealing their residence).

Regarding the protection of minors, the statutory solutions provide significantly broader possibilities, particularly concerning, for example, single-instance questioning during criminal proceedings (Article 185a of the CCP), mandatory presence of a psychologist (Articles 185a and b of the CCP), the possibility of participation in questioning by the legal guardian or caregiver of a minor under 15 years old (Article 171 § 3 of the CCP), and the possibility of including a minor under protection who is not the injured party when the injured party is their close person (Article 1 section 3 of the Act on the Protection and Assistance for Victims and Witnesses).

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

The current legal states that using the services of a victim of human trafficking does not constitute a separate type of crime. However, in connection with the implementation of Directive 2024/1712, there are plans to introduce this type of prohibited act into the Penal Code.

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

In relation to the above circumstance, it should be noted that due to organizational changes in the structure of the National Prosecutor's Office (regulation of July 29, 2022 (Journal of Laws 2022, item 1619) amending as of August 3, 2022, the Regulation of the Minister of Justice of April 7, 2016, on the internal operating rules of common prosecutorial organizational units (consolidated text, Journal of Laws 2023, item 1115, as amended)), the Department for Cybercrime and IT was established. The Department for Cybercrime and IT is responsible for, among other things:

- supervising and coordinating preparatory proceedings in cases of serious crimes committed using the Internet and advanced technologies and computer systems (cybercrime) conducted by regional, district, and local prosecutor's offices;
- coordinating the activities of the prosecutor's office and other state authorities as well as the Central Bureau for Combating Cybercrime in combating cybercrime;
- international cooperation in developing strategies to combat cross-border cybercrime and prosecute its perpetrators, cooperating with the Polish representative at EUROJUST concerning prosecutorial actions, and with representatives of other international and supranational organizations operating under international agreements ratified by the Republic of Poland for combating cybercrime.

One problem affecting preparatory proceedings is the lengthy process of obtaining and then processing information. This is due to many factors, including the waiting time for information from external entities (e.g., related to the execution by a bank of a prosecutor's order and sending the requested data), as well as the sometimes repeated copying of data onto forms (in the case of register data). During the discussed period, the common prosecutorial units implemented the PROK-SYS IT system. This system allows for obtaining and entering various data via appropriate interfaces, analysing it, generating documents based on it, and finally archiving them.

In 2021, a methodology for conducting preparatory proceedings using the PROK-SYS IT system was developed.

Due to the cybercrime problem, the National Prosecutor's Office developed several methodologies for conducting proceedings, such as the Methodology of Proceedings in Cases Involving Money Laundering, the Use of IT Tools in Child Pornography Crime and Dissemination, and the Methodology of Asset Seizure. Currently, the first version of electronic coordination and monitoring system for human trafficking crimes has been implemented in the indicated system.

Within the Operational-Investigative Directorate of the Main Command of the Border Guard, on May 20, 2024, the 8th Division for Cyber Reconnaissance was established. Its main tasks include obtaining information in cyberspace (from open source intelligence OSINT) necessary for recognizing, preventing, and detecting crimes falling under the authority of the formation (including human trafficking) and prosecuting their perpetrators using dedicated teleinformatics infrastructure, including publicly available open-source tools.

Furthermore, by the Act of December 17, 2021, amending the Police Act and certain other acts, a cybercrime-fighting service was separated, and a new organizational unit of the Police was created – the Central Bureau for Combating Cybercrime. This bureau, within its efforts to combat human trafficking crimes and related offenses, performs tasks such as:

- identifying illegal payments in cryptocurrencies, which are frequently used in human trafficking and CSAM material trade;
- cooperating with cryptocurrency exchanges to enable blocking wallets of suspicious users;
- using facial recognition systems that can identify individuals in recordings and photos even if their faces are partially covered;
- utilizing software based on an updated hash database created by the VIC project;
- employing OSINT tools – so-called white intelligence – enabling the search for information on widely used social media platforms. Such information like phone numbers, IP addresses, photos, and many others can be searched and correlated, which allows, for example, uncovering hidden profiles or all profiles linked to phone numbers, email addresses, IP addresses, photos, and other data used by providers in their service provision. This strengthens Police capabilities to identify victims of human trafficking, potential perpetrators, and other persons associated with the criminal activity.

Tools, dark web analysis, blockchain technology, biometrics, and advanced identification systems help law enforcement detect and apprehend criminals more effectively.

Police officers, as part of training aligned with professional development plans and training under the implementation of the National Program for Combating Human Trafficking, are introduced to the use

of technology by perpetrators in human trafficking crimes. During sessions, besides theoretical aspects, tools and software supporting officers in combating human trafficking on the internet are demonstrated.

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

No information in this regard.

## Part II – Country-specific follow-up questions

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

- develop a centralised and comprehensive data collection system on trafficking in human beings;

The significance of creating a centralized, comprehensive system for collecting and analysing data on victims of human trafficking, investigations, and criminal proceedings in this area has been repeatedly discussed by the main entities involved in gathering human trafficking data. The main challenge driving the creation of a unified system is the multi-stage nature of proceedings related to human trafficking, as well as the involvement of many entities at different stages of these proceedings. Nevertheless, the creation of a centralized system was indicated as one of the accepted principles in August 2025 by the Minister of the Interior and Administration, Mr. Marcin Kierwiński, as part of the assumptions for the planned Act on Counteracting Human Trafficking. The establishment of a system for recording and collecting statistical data is also foreseen in Article 19a of Directive 2024/1712.

- ensure access to public health care for all victims of trafficking, in particular those with a temporary residence permit who are unemployed in Poland;

The issue of access to public healthcare for all victims of human trafficking will be regulated by the proposed Act on Combating Human Trafficking.

- ensure that victims are effectively provided with free legal aid and appointed a lawyer to represent them in legal proceedings;

In the District Centres and Local Points operating within the Justice Fund, legal aid is provided. However, legal assistance is not guaranteed during court proceedings.

- facilitate effective access to compensation for victims of THB as part of criminal proceedings;

Based on art. 300 § 2 of the Act of June 6, 1997 – Code of Criminal Procedure (consolidated text, Journal of Laws of 2025, item 46; hereinafter: CCP), victims are informed about their rights, including the right to claim compensation. Moreover, in accordance with art. 88 § 1 CCP in conjunction with art. 78 § 1 CCP, victims have the right to use the assistance of a professional attorney free of charge throughout the entire criminal proceeding. Regarding the proceeding itself, it should be emphasized that pursuant to art. 297 § 1 points 4 and 5 CCP, the purpose of the preparatory proceedings is to clarify the circumstances of the case, including identifying the victims and the extent of damage, as well as collecting, securing, and, if necessary, preserving evidence for the court. Consequently, based

on art. 291 CCP, either ex officio or upon a party's request, it is possible to secure compensation, redress, and a penalty payment against the suspect's property. Concerning the right to compensation itself, it should be noted that according to art. 46 of the Act of June 6, 1997 – Penal Code (consolidated text, Journal of Laws of 2025, item 383), the court may decide ex officio or upon the victim's motion on the obligation to repair damage or provide redress for harm. If this is significantly difficult, the court may order a penalty payment in their favour of up to 200,000 PLN. These measures do not preclude pursuing the remainder of the compensation claim through civil proceedings.

Victims of human trafficking can benefit from legal assistance provided by the Victims' Assistance Network (Justice Fund) and through the free legal aid and free citizen counselling system.

In both systems, eligible individuals can receive information on compensation options, necessary documents, and case procedures. However, the assistance provided does not include legal assistance or legal representation during court proceedings.

A list of District Centres and Local Points operating within the Victims' Assistance Network is available at: <https://www.funduszsprawiedliwosci.gov.pl/pl/znajdz-osrodek-pomocy/>.

Free legal assistance points are managed by counties. Contact information for the point in a given county is available on the county's website. You can also schedule an appointment at: <https://zapisy-np.ms.gov.pl/>.

- review the eligibility criteria for state compensation to ensure that it is not conditional on the failure to obtain compensation from the perpetrator and accessible to victims regardless of their residence status in Poland.

Polish law is governed by the Act of July 7, 2005, on State Compensation for Victims of Certain Crimes (consolidated text, Journal of Laws of 2016, item 325), which specifies the principles and procedures for granting compensation and the terms of cooperation between authorities in the Republic of Poland and the authorities of other European Union Member States competent in proceedings to obtain this benefit.

Under this Act, individuals who, as a result of a criminal act, have suffered serious bodily harm, impairment of bodily functions, or health impairment lasting longer than seven days, or their next of kin (if the injured party has died as a result of the crime), may apply for compensation covering lost earnings or other means of subsistence, medical and rehabilitation costs, and funeral expenses resulting from the crime. Compensation cannot exceed PLN 25,000, or PLN 60,000 in the event of the victim's death.

Pursuant to Art. Under Article 4 of the aforementioned Act, compensation is awarded if the prohibited act was committed in the territory of the Republic of Poland to the detriment of a person permanently residing in that territory or in the territory of another European Union Member State. Compensation beneficiaries may include citizens of the Republic of Poland, citizens of European Union Member States, and third-country nationals with the right of permanent residence in the territory of the European Union. The condition for granting compensation and its amount is the inability of the eligible person to obtain coverage for lost earnings, other means of subsistence, or costs related to treatment or rehabilitation, or funeral expenses, from the perpetrator(s) of the crime, from insurance, or from social assistance funds, regardless of whether the perpetrator(s) of the crime have been identified (Article 5 of the Act).

Compensation cases are decided by the district court, applying the provisions of the Code of Civil Procedure, in a non-contentious procedure. Court registrars may also act in compensation cases. A

court registrar's ruling may be appealed to the court. It should be noted that the provisions of the Act apply to crimes committed from 1 July 2005. It should be emphasized that the Act on State Compensation for Victims of Certain Crimes has not been amended since the previous GRETA report was prepared, therefore the existing rules for granting compensation have not changed either.

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

- emerging trends of trafficking in human beings;

In Poland, the phenomenon of forced labour remains prevalent, including the provision of services against one's will. This is confirmed, among others, by findings from the Border Guard, which since GRETA's third evaluation report has not observed significant changes in this area. The victims are primarily men who are citizens of Latin American countries such as Colombia, Venezuela, Guatemala, and Mexico.

At the same time, alongside established forms of exploitation like forced labour and sexual exploitation, a new trend is emerging in the form of coercion into begging. The victims of this practice are people with disabilities.

The criminals' scheme for recruiting forced labourers often relies on deception. Perpetrators, operating still in the victims' countries of origin, make promises of attractive, well-paid jobs in Europe, including Poland. This prospect is further reinforced by false offers of free accommodation and meals.

Victims in difficult situations decide to leave, often incurring debts. Upon arrival, the work turns out to be hard and long-lasting, living conditions are inhumane, and wages are manipulated or unpaid. Workers are exploited as cheap labour, often without social or health insurance. The perpetrators include both Polish citizens and citizens of the victims' countries of origin cooperating with employment agencies.

Human traffickers also use technology. Increasingly, recruitment and control over trafficking victims are carried out online via internet messengers like Telegram or WhatsApp. Victims are forced to constantly share their location by sending photos of their surroundings. Recruitment advertisements also appear on social forums like Facebook or job offer websites. The internet is also used by criminals to move funds and to legitimize them by making purchases on the Darknet. Beyond traditional banking, criminals increasingly use broad electronic banking tools, such as cryptocurrencies.

- the legislation and regulations relevant to action against THB;

On October 1, 2023, new regulations came into effect that significantly increase the penalties stipulated in the Penal Code. The goal of these changes is to more effectively combat human trafficking.

According to the new regulations: Article 189a. § 1. Anyone who commits human trafficking is subject to imprisonment for no less than 3 years, with a range from 3 to 20 years (previously, the maximum penalty was 15 years). If the offender is proven to have acted with particular cruelty, the sentence may be from 5 to 25 years in prison.

On April 9, 2024, during the inaugural meeting of the Interdepartmental Team for Combating Human Trafficking, the National Referral Mechanism (NRM) was adopted by resolution. This document already serves as a binding act regulating cooperation rules among institutions involved in fighting human trafficking. The NRM was created to improve the identification of trafficking victims and ensure

they receive necessary assistance. It defines procedures for cooperation between law enforcement, government institutions, and NGOs to effectively fight this crime and protect its victims. The document aligns with both national laws and international regulations, including EU guidelines.

On November 15, 2024, the Secretary of State at the Ministry of the Interior and Administration, Mr. **Czesław Mroczek**, serving as Chair of the Inter-ministerial Team for Combating Human Trafficking, decided to establish an interdisciplinary working group tasked with drafting a law to counter human trafficking. This decision was driven by the need to implement European Parliament and Council Directive (EU) 2024/1712, which amends Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, as well as by the need to unify previously scattered regulations in Polish law regarding anti-trafficking measures. Between February and June 2025, under this working group, numerous consultations were held, including three meetings with experts, government representatives, and NGOs. As a result of these analytical efforts, the comprehensive assumptions for the draft law, attached to this note, were prepared. The proposed legislative solutions aim to fulfil Poland's international obligations toward the UN, OSCE, and the Council of Europe, and additionally strengthen the institutional framework of the national anti-trafficking system. A key element of the proposed regulations is the introduction of a legal definition for a victim and presumed victim of human trafficking, along with a precise delineation of the competence of agencies and public institutions responsible for identification and assistance. Regarding the effectiveness of prosecuting human trafficking crimes, the planned regulations foresee stricter criminal penalties for offenders, expanded liability for legal persons, and the inclusion of the private sector in preventive actions against forced labour exploitation. The draft law's assumptions also include a separate chapter dedicated to combating trafficking in children and protecting minor victims by applying the principle of the child's best interest and establishing the obligation to appoint a legal guardian. Moreover, the draft imposes educational obligations on uniformed services personnel, the judiciary, support institutions, and employees in the health and education sectors. In August 2025, the current Minister of the Interior and Administration, Mr. Marcin Kierwiński, approved the assumptions for the law.

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

By Order No. 392 of the Prime Minister dated September 18, 2023, the status of the Team for Combating Human Trafficking was raised from a ministerial to an interministerial level. As an advisory body to the Prime Minister, the Team provides a better forum for legislative changes, strengthens national coordination by shortening the decision-making process in the area of combating human trafficking, makes management processes more flexible, and increases the effectiveness of implemented actions.

In mid-2024, due to the reorganization and structural changes within the Ministry of the Interior and Administration, the Team for Coordination of Combating Human Trafficking was moved from the Department of International Affairs and Migration to the structure of the Public Order Department. The expert staff dealing with human trafficking remained the same, and the status of the team was elevated to the level of the division for prevention and combating human trafficking, similar to the structure in the National Police Headquarters, where a Division for Combating Human Trafficking has operated for years within the Criminal Bureau.

The Inter-ministerial Team for Combating Human Trafficking was strengthened with new key members, significantly expanding the range of competencies and operational capabilities of this body. Among the new entities joining the Team were the Human Trafficking Research Centre of the University of Warsaw, the Save the Children Foundation, and the Office of the Ombudsman for Small

and Medium Enterprises, whose involvement is particularly important in the context of engaging the private sector in preventive activities and raising awareness among entrepreneurs about the risks of forced labour exploitation.

Another change that took place in 2025 was a modification in the makeup of those implementing the task of running the National Intervention and Consulting Centre (KCIK). The La Strada Foundation, which had operated the Centre uninterruptedly for years, gained a new partner in the form of the DIALOG Foundation, which replaced the previous co-implementer — the Maria Immaculate Association for Women and Children.

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

In response to contemporary challenges, on March 19, 2025, the Council of Ministers adopted a new National Action Plan Against Human Trafficking for the years 2025–2027. This document, continuing the government's previous efforts, was carefully developed by a working group operating within the Inter-ministerial Team for Counteracting Human Trafficking.

In addition to continuing existing initiatives, the plan introduces important solutions adapted to current challenges. Among them are:

1. Expanding the scope of training and victim identification. The plan envisages significantly broadening training programs to include new professional groups that may have direct contact with potential victims, including:
  - Employees of crisis intervention centres;
  - Prison Service officers;
  - Emergency number operators;
  - Staff of non-governmental organizations (NGOs) actively supporting migrants.
2. Strengthening actions aimed at job seekers, particularly foreigners and people in difficult economic situations — which is crucial given that forced labour is currently the dominant form of exploitation in Poland.
3. Increasing focus on education and prevention among youth and pedagogical-psychological environments, in response to the rise in children and youth activity on social media platforms, which perpetrators use to recruit victims.

Furthermore, considering the migration situation and counteracting the emerging threats resulting from Russian aggression against Ukraine, as well as the growing risk of refugees being exploited in human trafficking, it was decided to increase funding for the National Consulting and Intervention Centre for the Victims of Trafficking for Victims of Human Trafficking (KCIK) by nearly 40% (to 1,500,000 PLN) in 2023. Additionally, in November 2023, the Minister of the Interior and Administration decided to further increase the targeted grant for implementing the above public task by the amount of 220,000.00 PLN.

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

There is no information in this regard.

### Part III – Statistics on THB

42. Please provide the following statistics, per year starting with 2023, where available disaggregated as indicated below:

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

The data covers assistance provided to victims under the Network for Victims of Crime (Sieć Pomocy Osobom Pokrzywdzonym Prześpiństwem) funded by the Justice Fund:

- In 2023, 25 people received assistance (m: 7, f: 18)
- In 2024, 25 people received assistance (m: 6, f: 19)
- In the first half of 2025, 12 people received assistance (m: 4, f: 8)
- Total assistance received from 2023 to June 2025: 62 people
- Number of women: 45
- Number of men: 17
- Under 18: 5
- Ages 18-65: 49
- Over 65: 8

Data from the National Consulting and Intervention Centre for the Victims of Trafficking (KCIK):

2023

- 295 people (130 women and 165 men)
- Countries of origin: Azerbaijan: 1 person, Argentina: 15 people, Bulgaria: 2 people, Philippines: 18 people, Guatemala: 5 people, Guinea: 3 people, India: 1 person, Indonesia: 3 people, Yemen: 6 people, Cameroon: 1 person, Kenya: 1 person, Colombia: 115 people, Congo: 3 people, Morocco: 1 person, Mauritius: 2 people, Mexico: 17 people, Moldova: 6 people, Nigeria: 1 person, Poland: 18 people, Russia: 3 people, Sierra Leone: 5 people, Slovakia: 2 people, Sri Lanka: 1 person, Uganda: 11 people, Ukraine: 19 people, Venezuela: 32 people, Vietnam: 1 person, Côte d'Ivoire: 1 person, Zimbabwe: 1 person.
- 280 adults and 15 minors.
- Purposes of exploitation of child beneficiaries: sexual exploitation - 2 people, domestic slavery - 1 person, incitement to commit crimes - 1 person, violence and abduction - 1 person, forced begging - 2 people.
- Unexploited minors: child victims of human trafficking: 8 people.
- Purposes of exploitation of adult beneficiaries: sexual exploitation - 23 people, forced labour - 213 people, sexual exploitation - 3 people, forced begging - 5 people, forced marriage - 1 person, violation of labour rights - 21 people, domestic slavery - 1 person, domestic violence - 2 people, unexploited - 11 people.
- The individuals were identified by the National Consulting and Intervention Centre for the Victims of Trafficking.

## 2024

- 289 people, including 113 women, 176 men
- Countries of origin: Argentina: 23 people, Dominican Republic: 1 person, Philippines: 10 people, Georgia: 2 people, Guatemala: 6 people, Guinea: 5 people, Netherlands: 1 person, India: 2 people, Yemen: 6 people, Kenya: 1 person, Colombia: 127 people, Congo: 4 people, Cuba: 1 person, Latvia: 1 person, Mauritius: 1 person, Mexico: 7 people, Moldova: 6 people, Nigeria: 1 person, Peru: 3 people, Poland: 12 people, Russia: 7 people, Romania: 1 person, Sierra Leone: 2 people, Slovakia: 1 person, Turkmenistan: 1 person, Uganda: 6 people, Ukraine: 13 people, Uzbekistan: 1 person, Venezuela: 36 people, Zimbabwe: 1 person.
- 273 adults and 16 minors.
- Purposes of exploitation of child beneficiaries: rape - 1 person, domestic servitude - 1 person, forced labour - 1 person, coercion to commit crimes - 1 person.
- Unexploited minors - child victims of human trafficking: 12 people.
- Purposes of exploitation of adult beneficiaries: sexual exploitation - 21 people, forced labour - 191 people, coercion to commit crimes - 2 people.
- Forced begging - 9 people, violations of labour rights - 26 people.
- Domestic servitude - 1 person. Unexploited - 19 people, including victims' families (wives, adult children) - 4 people.
- The individuals were identified by the National Consulting and Intervention Centre for the Victims of Trafficking.

## 2025 - data to June 30, 2025

- 191 people, including 78 women, 113 men
- Countries of origin: Venezuela: 23 people, Congo: 2 people, Russia: 7 people, Canada: 1 person, Mexico: 2 people, Argentina: 12 people, Belarus: 1 person, Bulgaria: 3 people, Guatemala: 2 people, Guinea: 1 person, India: 1 person, Colombia: 97 people, Latvia: 1 person, Mauritius: 1 person, Moldova: 2 people, Paraguay: 1 person, Peru: 2 people, Sierra Leone: 3 people, Uganda: 4 people, Poland: 16 people, Ukraine: 9 people.
- 180 adults and 11 minors,
- Purposes of exploitation of minor beneficiaries: rape – 1 person.
- Unexploited minors – children of victims of human trafficking: 9 people and 1 minor.
- Forms of exploitation: adults: sexual exploitation – 18 people, forced labour – 129 people, domestic slavery – 1 person, forced begging – 7 people, forced crimes – 1 person, violation of workers' rights – 18 people, forced marriage – 1 person. Unexploited: 5 people (including the victims' families – 2 wives).
- The individuals were identified by the National Consulting and Intervention Centre for the Victims of Trafficking.

- Number of victims of THB identified as part of the asylum procedure (disaggregated by sex, age, nationality, form of exploitation).

2023	nationality	sex	type of exploitation
1.	Cameroon	F	sexual exploitation
2.	Ukraine	M	sexual exploitation
3.	Ukraine	F	sexual exploitation
4.	Ukraine	F	sexual exploitation
5.	Ukraine	F	sexual exploitation

6.	Ukraine	F	sexual exploitation
7.	Ukraine	M	sexual exploitation
8.	Ukraine	F	sexual exploitation
9.	Ukraine	M	sexual exploitation
10.	Ukraine	M	sexual exploitation
11.	Ukraine	F	sexual exploitation
12.	Guinea	F	sexual exploitation

2024	nationality	sex	type of exploitation
1.	Russia	M	forced begging
2.	Russia	M	forced begging
3.	Russia	M	forced begging
4.	Russia	M	forced begging
5.	Ghana	F	sexual exploitation

2025	country	sex	type of exploitation
1.	Russia	M	benefit fraud
2.	Nigeria	F	sexual exploitation
3.	Cameroon	M	forced labour
4.	Russia	M	forced begging

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

#### Data on assistance provided to victims within the Crime Victims Support Network (Justice Fund):

- In 2023, 25 people received assistance (M:7, F:18)
- In 2024, 25 people received assistance (M:6, F:19)
- In the first half of 2025, 12 people received assistance (M:4, F:8)
- Total assistance from 2023 to June 2025 was provided to 62 people.
- Number of women: 45
- Number of men: 17
- Under 18 years old: 5 people
- Aged 18-65: 49 people
- Over 65 years old: 8 people

No information available in the records about nationality, form of exploitation, or jurisdiction (domestic or international).

#### National Consulting and Intervention Centre for the Victims of Trafficking:

Victims of human trafficking who received material, psychological, medical, legal, and translation assistance:

#### 2023

- 295 people, including 130 women and 165 men

- Countries of origin: Azerbaijan: 1 person, Argentina: 15, Bulgaria: 2, Philippines: 18, Guatemala: 5, Guinea: 3, India: 1, Indonesia: 3, Yemen: 6, Cameroon: 1, Kenya: 1, Colombia: 115, Congo: 3, Morocco: 1, Mauritius: 2, Mexico: 17, Moldova: 6, Nigeria: 1, Poland: 18, Russia: 3, Sierra Leone: 5, Slovakia: 2, Sri Lanka: 1, Uganda: 11, Ukraine: 19, Venezuela: 32, Vietnam: 1, Ivory Coast: 1, Zimbabwe: 1
- 280 adults and 15 minors
- Forms of exploitation of minor beneficiaries: sexual exploitation - 2, domestic slavery - 1, coercion to commit crimes - 1, violence and abduction - 1, forced begging - 2
- Unexploited minors: children of trafficking victims - 8
- Exploitation of adult beneficiaries: sexual exploitation - 23, forced labour - 213, sexual abuse - 3, forced begging - 5, forced marriage - 1, violation of workers' rights - 21, domestic slavery - 1, domestic violence - 2, unexploited - 11
- People identified by the National Consulting and Intervention Centre for the Victims of Trafficking.

#### 2024

- 289 people, including 113 women and 176 men
- Countries of origin: Argentina: 23, Dominican Republic: 1, Philippines: 10, Georgia: 2, Guatemala: 6, Guinea: 5, Netherlands: 1, India: 2, Yemen: 6, Kenya: 1, Colombia: 127, Congo: 4, Cuba: 1, Latvia: 1, Mauritius: 1, Mexico: 7, Moldova: 6, Nigeria: 1, Peru: 3, Poland: 12, Russia: 7, Romania: 1, Sierra Leone: 2, Slovakia: 1, Turkmenistan: 1, Uganda: 6, Ukraine: 13, Uzbekistan: 1, Venezuela: 36, Zimbabwe: 1
- 273 adults and 16 minors
- Minor exploitation cases: rape - 1, domestic slavery - 1, forced labour - 1, coercion to commit crimes - 1
- Unexploited minors - children of trafficking victims: 12
- Adult exploitation cases: sexual exploitation - 21, forced labour - 191, coercion to commit crimes - 2, forced begging - 9, violation of workers' rights - 26, domestic slavery - 1, unexploited - 19 (including family members of victims: wives, adult children - 4)
- Identified by the National Consulting and Intervention Centre for the Victims of Trafficking.

#### 2025 (data until June 30)

- 191 people, including 78 women and 113 men
- Countries of origin: Venezuela: 23, Congo: 2, Russia: 7, Canada: 1, Mexico: 2, Argentina: 12, Belarus: 1, Bulgaria: 3, Guatemala: 2, Guinea: 1, India: 1, Colombia: 97, Latvia: 1, Mauritius: 1, Moldova: 2, Paraguay: 1, Peru: 2, Sierra Leone: 3, Uganda: 4, Poland: 16, Ukraine: 9
- 180 adults and 11 minors
- Minor exploitation cases: rape - 1
- Unexploited minors - children of trafficking victims: 9 and 1 minor person
- Forms of exploitation of adults: sexual exploitation - 18, forced labour - 129, domestic slavery - 1, forced begging - 7, coercion to commit crimes - 1, violation of workers' rights - 18, forced marriage - 1, unexploited - 5 (including family members of victims - 2 wives)
- Identified by the National Consulting and Intervention Centre for the Victims of Trafficking.

- Number of child victims of THB who were appointed legal guardians.

Data on assistance provided to victims under the Victim Support Network (Justice Fund):

There is no legal assistance for individuals under 18 years of age. Legal assistance was provided only to adults: 33 individuals aged 18-65 and 6 individuals over 65 years old.

Data from the National Consulting and Intervention Centre for the Victims of Trafficking regarding children who received legal assistance – both those identified as victims of human trafficking and child victims:

- 2023 - 9 individuals
  - 2024 - 11 individuals
  - 2025 (data up to June 30, 2025) - 11 individuals
- Number of victims of THB granted a recovery and reflection period (disaggregated by sex, age, nationality, form of exploitation).

➤  
2023 - 150 individuals

- Countries of Origin: • Countries of origin: Argentina 2 people, Bulgaria 1 person, Philippines 6 people, Guatemala 5 people, Guinea 2 people, India 1 person, Yemen 6 people, Cameroon 1 person, Colombia 64 people, Congo 1 person, Mexico 9 people, Moldova 3 people, Poland 2 people, Russia 2 people, Sierra Leone 3 people, Uganda 3 people, Ukraine 9 people, Venezuela 30 people
- Adults: 148
- Minors: 2
- Women: 49
- Men: 101
- Sexual exploitation: 13
- Forced labour: 135
- Forced begging: 2

2024 - 136 individuals

Countries of origin: Argentina 6 people, Philippines 3 people, Guatemala 3 people, Guinea 2 people, India 2 people, Yemen 6 people, Colombia 60 people, Congo 1 person, Mexico 4 people, Moldova 4 people, Peru 1 person, Poland 1 person, Russia 7 people, Sierra Leone 1 person, Uganda 2 people, Ukraine 4 people, Uzbekistan 1 person, Venezuela 28 people

- Adults: 135
- Minors: 1
- Women: 43
- Men: 93
- Sexual exploitation: 7
- Forced labour: 120
- Forced begging: 8
- Domestic slavery: 1

2025 (data until June 30, 2025) - 110 people

- Countries of origin: Argentina 11, Bulgaria 3, Guatemala 2, Guinea 1, India 1, Colombia 57, Congo 1, Mexico 2, Moldova 2, Peru 1, Poland 1, Russia 6, Uganda 3, Ukraine 1, Venezuela 18.
- Women: 31
- Men: 79

- Adults: 110
  - Sexual exploitation: 6
  - Forced labour: 97
  - Forced begging: 7
- Number of victims of THB granted a residence permit, with an indication of the type of the permit (for the purpose of co-operation in the investigation/proceedings, on personal grounds, other) and its duration (disaggregated by sex, age, nationality, form of exploitation).

## 2023

- Applications for Residence Permits:
  - Due to circumstances related to being a victim of human trafficking: 77 individuals (Countries: Guatemala: 4, Yemen: 6, Colombia: 41, Mexico: 3, Uganda: 4, Venezuela: 19)
  - Duplicate application for residence permit: 1 individual (Country: Guinea: 1)
  - Statement of cessation of work for a specified employer: 3 individuals (Country: Colombia: 3)
  - Application for residence permit for work: 10 individuals (Countries: Philippines: 1, Colombia: 6, Nigeria: 1, Venezuela: 2)
  - Application for marriage: 1 individual (Country: Uganda: 1)
  - Application for international protection: 10 individuals (Countries: Uganda: 1, Guinea: 1, Cameroon: 1, Sierra Leone: 1, Congo: 1, Russia: 1, Colombia: 4)
  - Application for family reunification: 1 individual (Country: Colombia: 1)
  - Application for other circumstances: 1 individual (Country: Nigeria: 1)
- Residence Status as of December 31, 2023:
  - Application for international protection: 7 individuals (Countries: Guinea: 1, Colombia: 4, Congo: 1, Russia: 1)
  - Special law: 5 individuals (Country: Ukraine: 5)
  - Polish citizens: 19 individuals (including 1 child with dual Polish and Colombian citizenship)
  - Subsidiary protection: 8 individuals (Countries: Guinea: 2, Congo: 1, Sierra Leone: 5)
  - Appeal against return obligation: 3 individuals (Countries: Congo: 1, Colombia: 1, Mauritius: 1)
  - Illegal status: 19 individuals (Countries: Argentina: 3, Philippines: 2, Colombia: 11, Mexico: 2, Russia: 1)
  - EU citizens: 4 individuals (Countries: Bulgaria: 2, Slovakia: 2)
  - Refugee status: 3 individuals (Country: Uganda: 3)
  - Visa-free movement: 10 individuals (Countries: Colombia: 5, Argentina: 5)
  - Certificate of being a presumed victim of human trafficking: 9 individuals (Countries: Colombia: 4, Moldova: 4, Russia: 1)
  - 104 individuals left Poland, lost contact, and their residence status was unknown.

## 2024

- Applications for Residence Permits:
  - Due to circumstances related to being a victim of human trafficking: 47 individuals (Countries: Argentina: 6, India: 1, Yemen: 1, Colombia: 24, Mexico: 1, Russia: 4, Venezuela: 10)
  - Application for residence permit for work: 34 individuals (Countries: Argentina: 6, Guatemala: 1, India: 1, Colombia: 20, Peru: 1, Venezuela: 5)
  - Application for family reunification: 8 individuals (Countries: Colombia: 4, Venezuela: 4)
  - Application for permanent residence: 1 individual (Country: Guinea: 1)
  - Application for international protection: 5 individuals (Countries: Colombia: 3, Guinea: 1, Russia: 1)
  
- Residence Status as of December 31, 2024:
  - Residence permit due to circumstances related to being a victim of human trafficking: 38 individuals (Countries: Guatemala: 2, Colombia: 22, Mexico: 2, Uganda: 4, Venezuela: 8)
  - Humanitarian residence permit: 1 individual (Country: Congo: 1)
  - No data (termination of cooperation, loss of contact, negative identification and pre-identification): 60 individuals (Countries: Argentina: 10, Dominican Republic: 1, Philippines: 1, Guatemala: 2, Netherlands: 1, Yemen: 5, Colombia: 26, Congo: 1, Mexico: 1, Moldova: 2, Nigeria: 1, Ukraine: 3, Venezuela: 4, Zimbabwe: 1, Kenya: 1)
  - Temporary residence permit for work: 4 individuals (Countries: Philippines: 3, Uganda: 1)
  - Outside the territory of Poland: 49 individuals (Countries: Argentina: 1, Philippines: 6, Georgia: 2, Guatemala: 1, Colombia: 22, Cuba: 1, Mexico: 2, Moldova: 2, Peru: 1, Russia: 1, Turkmenistan: 1, Ukraine: 3, Uzbekistan: 1, Venezuela: 5)
  - Temporary residence permit for education: 1 individual (Country: Ukraine: 1)
  - Illegal status: 4 individuals (Countries: Mexico: 1, Colombia: 2, Ukraine: 1)
  - EU citizens, including Polish citizens: 15 individuals (Countries: Poland: 12, Latvia: 1, Romania: 1, Slovakia: 1)
  - Subsidiary protection: 4 individuals (Countries: Sierra Leone: 2, Guinea: 2)
  - Appeal against return obligation: 3 individuals (Countries: Mauritius: 1, Colombia: 2)
  - Appeal against the decision of not granting international protection: 1 individual (Country: Congo: 1)
  - Special law: 4 individuals (Country: Ukraine: 4)
  - Refugee status: 3 individuals (Countries: Uganda: 1, Guinea: 1, Congo: 1)
  - Certificate for presumed victims of human trafficking: 7 individuals (Countries: Colombia: 2, Moldova: 2, Peru: 1, Russia: 1, Ukraine: 1)

## 2025 (data up to June 30, 2025)

- Applications for Residence Permits:

- Temporary residence and work permit: 2 individuals (Citizens of Uganda)
- Application for work permit: 25 individuals (Citizens: Venezuela: 2, Colombia: 21, Peru: 1, Paraguay: 1)
- Temporary residence permit due to circumstances related to being a victim of human trafficking: 22 individuals (Citizens: Argentina: 4, Colombia: 9, Uganda: 2, Venezuela: 7)
- Application for family reunification: 5 individuals (Citizens: Colombia: 4, Venezuela: 1)
- Refugee status: 2 individuals (Citizens: Congo and Russia)
- Subsidiary protection: 5 individuals (Citizens: Sierra Leone: 3, Russia: 2)
- Appeal against deportation decision: 1 individual (Citizen of Mauritius)
- Application for international protection: 3 individuals (Citizens: Congo: 1, Russia: 1, Ukraine: 1)
- Certificate based on Article 170 of the Foreigners Act: 1 individual (Citizen of Colombia)
- Appeal against negative decision regarding temporary residence permit for work: 1 individual (Citizen of Colombia)
- Appeal against negative decision regarding temporary residence permit due to circumstances related to being a victim of human trafficking: 1 individual (Citizen of Colombia)
- Law on assistance to Ukrainian citizens due to the armed conflict in Ukraine (Special Law): 4 individuals (Citizens of Ukraine)
- Application for residence permit due to circumstances related to being a victim of human trafficking: 64 individuals (Citizens: Argentina: 5, Guatemala: 1, India: 1, Colombia: 42, Mexico: 1, Moldova: 1, Russia: 3, Venezuela: 10)
- 2 individuals are EU citizens whose stay in Poland does not require special legalization (Citizens: Latvia and Bulgaria)
- Illegal status: 3 individuals (Citizens: Colombia: 3)
- Application for temporary residence permit for other circumstances: 1 individual (Citizen of Colombia)
- No information on 11 individuals (Citizens: Argentina: 2, Belarus: 1, Guinea: 1, Colombia: 5, Ukraine: 2)
- Not residing in Poland: 18 individuals (Citizens: Argentina: 1, Bulgaria: 2, Guatemala: 1, Colombia: 9, Moldova: 1, Peru: 1, Ukraine: 2, Canada: 1)
- Appeal against negative decision regarding family reunification: 4 individuals (Citizens: Venezuela: 3, Colombia: 1)
- 16 individuals are Polish citizens.

The National Consulting and Intervention Centre for the Victims of Trafficking only maintains statistical data regarding citizenship and the form of protection granted. It does not keep more detailed statistics. Individuals were pre-identified for human trafficking; according to our information, they were not granted refugee status or international protection due to being victims of human trafficking, but due to other circumstances.

- Subsidiary protection: 8 people: Guinea: 2, Congo: 1, Sierra Leone: 5.
- Refugee status: 3 people: Uganda: 3

2024

- Subsidiary protection: 4 people: Sierra Leone: 2, Guinea: 2
- Refugee status: 3 people: Uganda: 1, Guinea: 1, Congo: 1

2025 data to June 30, 2025

- Subsidiary protection: 5 people: Sierra Leone: 3, Russia: 2
- Refugee status: 2 people: Congo: 1 and Russia: 1

- 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).

2023

Subsidiary Protection: Granted to a male citizen of Guinea, born in 1988, who was exploited for sexual labour. This protection was provided under Article 15(2) of the Act on granting protection to foreigners in Poland.

2024

Subsidiary Protection: Granted to a male citizen of Russia, born in 1978, who was exploited for begging. This was also under Article 15(2) of the same Act.

Refugee Status: Granted to three individuals from Uganda, Guinea, and Congo, reflecting the ongoing need for protection among vulnerable populations.

2025 (data up to June 30, 2025)

Refugee Status: Granted to a female citizen of the Democratic Republic of the Congo (DRC), born in 2006, who was exploited for sexual labour, under Article 13(1) of the Act.

Subsidiary Protection: Again granted to a male citizen of Russia, born in 1978, for exploitation related to begging, under Article 15(2).

- 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).

Currently, such statistical data is not collected as part of statistical reporting.

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

Data on assistance provided to victims within the Victim Assistance Network (Justice Fund):

- Coverage of temporary accommodation or shelter costs: 8 individuals, total amount – 41,279.93 PLN in 2024.

- Funding for periodic subsidies for current rent obligations and payments for heating, electricity, gas, water, heating, and the collection of solid and liquid waste for the residential premises or single-family house, for which the eligible person has legal title, proportionally to the number of persons permanently residing in that premises or house: 4 individuals, total amount – 3,779.40 PLN in 2023.
- Funding for public transport fares or covering transportation costs related to obtaining benefits and settling matters specified in points 1-10: 1 individual for the amount of 284.00 PLN in 2023.
- Coverage of food costs or food vouchers: 12 individuals, total amount – 6,200.00 PLN.
- In 2023: 3 individuals for the amount of 900.00 PLN.
- In 2024: 9 individuals for the amount of 5,300.00 PLN.
- In the first half of 2025: 0 individuals.
- Coverage of costs for the purchase of clothing, underwear, footwear, cleaning products, and personal hygiene items: 10 individuals, total amount – 2,277.05 PLN.
- In 2023: 4 individuals for the amount of 877.05 PLN.
- In 2024: 6 individuals for the amount of 1,400.00 PLN.
- In the first half of 2025: 0 individuals.
- Funding for travel costs: 1 individual for the amount of 1,203.00 PLN in 2023.
- Coverage of health care costs, medications that are not reimbursed or only partially reimbursed, medical products, including dressings, orthopaedic items, and auxiliary means, necessary in the treatment process of health damage resulting from the crime or its consequences: 2 individuals, total amount – 10,084.28 PLN.
- In 2023: 0 individuals.
- In 2024: 2 individuals for the amount of 10,084.28 PLN.
- In the first half of 2025: 0 individuals.
- Total amount of assistance: 65,107.66 PLN.
- Number of victims of THB who received free legal aid.

Data on legal assistance provided to victims within the Victim Assistance Network (Justice Fund):

Legal Assistance:

- 33 individuals aged 18-65:
  - In 2023: 20 individuals
  - In 2024: 9 individuals
  - In the first half of 2025: 4 individuals

— 6 individuals over 65 years old in 2023.

Data from the National Consulting and Intervention Centre for the Victims of Trafficking (KCIK):

Legal assistance was provided by Pro Publico Bono lawyers, volunteers, and other NGOs.

- 2023: 175 individuals received free legal assistance.
  - 2024: 158 individuals received free legal assistance.
  - 2025 (up to June 30): 139 individuals received free legal assistance.
- Number of victims of THB who were returned or repatriated to/from your country (disaggregated by sex, age, country of destination, form of exploitation).

The number of individuals recognized as victims of human trafficking who received support for voluntary return from the International Organization for Migration (IOM) under an agreement with the Minister of the Interior and Administration:

2023: Seventeen (17) persons were identified as victims of trafficking. All of them were victims of labour exploitation: 10 from Colombia, 1 from Bulgaria, 4 from Mexico, and 2 from Argentina. Male victims - 11, female victims - 6.

2024: Fourteen (14) victims of trafficking (VoTs) were provided with assisted voluntary return: 5 from Colombia, 1 from Brazil, 2 from Moldova, 3 from the Philippines, 1 from Uzbekistan, and 2 from Venezuela. All of them were victims of labour exploitation. Male victims - 5, female victims - 9.

Data from the National Consulting and Intervention Centre for the Victims of Trafficking (KCIK):

2023: Returns to the country of origin: 50 individuals (citizens: Argentina: 6, Bulgaria: 2, Colombia: 22, Mexico: 6, Mauritius: 1, Poland: 3, Venezuela: 1, Ukraine: 9).

2024: Returns to the country of origin: 33 individuals (citizens: Argentina: 1, Philippines: 5, Colombia: 18, Mexico: 2, Moldova: 2, Peru: 1, Poland: 2, Ukraine: 2).

2025: Returns to the country of origin: 24 individuals (citizens: Bulgaria: 3, Guatemala: 1, Canada: 1, Colombia: 3, Poland: 6, Ukraine: 1, Argentina: 1, Colombia: 6, Moldova: 1, Peru: 1).

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

Data from the Border Guard:

- In 2023, 7 investigations were initiated regarding human trafficking, and 58 presumed victims of human trafficking were identified. The investigations concerned the following areas of exploitation:
  - 3 related to forced labour exploitation,
  - 2 related to forced begging,
  - 2 related to sexual exploitation.

- In 2024, 11 investigations were initiated regarding human trafficking, and 74 presumed victims of human trafficking were identified. The investigations concerned the following areas of exploitation:
  - 7 related to forced labour exploitation,
  - 3 related to forced begging,
  - 1 related to sexual exploitation.
  
- In 2025 (as of the end of the third quarter of 2025), 6 investigations were initiated regarding human trafficking, and 50 presumed victims of human trafficking were identified. The investigations concerned the following areas of exploitation:
  - 2 related to forced labour exploitation,
  - 3 related to forced begging,
  - 1 related to sexual exploitation.

Data from the Police based on information entered into the National Police Information System (KSIP) according to the registering unit:

Act	Article	TEMIDA qualification	2023		2024	
			Proceedings initiated	Crimes identified	Proceedings initiated	Crimes identified
Act of June 6, 1997 - Penal Code	Art. 189a § 1	Other forms of exploitation that degrade human dignity	2	3		
		In slavery				1
		In forced labour or services	7	2	7	7
		In prostitution, pornography or other forms of sexual exploitation		3	3	6
		In begging	1	3	1	1
	Art. 189a § 2	Other forms of exploitation that degrade human dignity				1
		For the purpose of obtaining cells, tissues or organs contrary to the provisions of the Act	2			
		In forced labour or services	1			1
		In prostitution, pornography or other forms of sexual exploitation		1		
<b>Total</b>			<b>13</b>	<b>12</b>	<b>11</b>	<b>17</b>

Act	Article	TEMIDA qualification	nationality	age	The injured parties					
					2023		Summary: 2023	2024		Summary: 2024
					Female	Male		Female	Male	
Act of June 6, 1997 - Penal Code	Art. 189a § 1	Other forms of exploitation that degrade human dignity	POLAND	<=16	2		2			
			UKRAINE	17-20	2		2			
				21-24	1		1			
				25-29	1		1			
		In slavery, forced labour or services	UKRAINE	21-24					1	1
			COLUMBIA	17-20		1	1			
				21-24		1	1			
				25-29		1	1			
			POLAND	17-20	1		1			
				21-24					1	1
				25-29					1	1
				30-49					1	2
		In prostitution, pornography or other forms of sexual exploitation	BULGARIA	<=16	1		1			
				POLAND	17-20	1		1	1	1
			POLAND	21-24					1	1
25-29							3	3		
In begging	POLAND	<=16	2		2	1		1		
		UKRAINE	30-49 yr.	2		2				
	LATVIA	>= 50		1	1					

<b>Total</b>	<b>13</b>	<b>4</b>	<b>17</b>	<b>8</b>	<b>9</b>	<b>17</b>
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- Number of prosecutions in THB cases (disaggregated by type of exploitation, with an indication of the number of victims and defendants concerned).

## 2024

- Number of proceedings initiated under Article 189a of the Penal Code - 26, 26 perpetrators;
  - The proceedings included forms of exploitation such as: forced labour (13 proceedings), profiting from begging (4), exploitation in prostitution and sexual services (3), and other forms of exploitation (e.g., for committing crimes - 6);
- Number of pending proceedings under Article 189a of the Penal Code (initiated in previous years but not concluded in 2024) - 12 proceedings, 14 perpetrators;
  - The proceedings included forms of exploitation such as: forced labour, exploitation in conditions degrading human dignity;
- Number of concluded proceedings - 43, including:
  - - indictment filed - 9
  - - issuance of a decision to discontinue the investigation - 17
  - - issuance of a decision to suspend the proceedings - 5
  - - issuance of a decision refusing to initiate an investigation - 12;
  - Number of proceedings involving forced labour as a form of exploitation - 15
  - Other identified forms of exploitation concerned: exploitation in prostitution and sexual services, illegal adoptions, and exploitation for other purposes, such as begging;
- Number of persons indicted - 25, including:
  - - number of persons accused of exploitation for forced labour - 17
  - - number of persons accused of exploitation for other purposes – begging - 6
  - - number of persons accused of exploitation in prostitution and sexual services - 2. • number of foreign nationals among the accused - 14, including citizens of Moldova, Ukraine, and Bulgaria;
- number of individuals subjected to pre-trial detention - 17;
- number of individuals subjected to non-custodial preventive measures - 20;
- number of proceedings in which the classification of the offense was changed - 2, including:
  - in one case, the classification of the offense was changed from human trafficking to another type of offense, i.e., to an offense under Article 56 § 1 of the Code of Criminal Procedure;
  - in the second case, the classification of the offense was changed from human trafficking to another type of offense, i.e., to an offense under Article 204 § 1 of the Criminal Code;
- number of individuals identified as victims of human trafficking - 316;

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

2023:

- The total number of convicted offenders is 18 (4 women and 14 men).

2024:

- The total number of convicted offenders is 14 (5 women and 9 men).
- 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.

2023

Total Convictions: 18, including:

- Convictions under Article 189a §1 of the Penal Code: 12  
 Adult Victims: 42 (30 women and 12 men)  
 Minor Victims: 1 (1 girl)
- Convictions under Article 189a §2 of the Penal Code (preparation to commit a crime): 0  
 Adult Victims: 0  
 Minor Victims: 0

2024

Total Convictions: 14, including:

- Convictions under Article 189a §1 of the Penal Code: 12  
 Adult Victims: 30 (8 women and 22 men)  
 Minor Victims: 4 (3 girls and 1 boy)
- Convictions under Article 189a §2 of the Penal Code (preparation to commit a crime): 2
- Adult Victims: 1 man
- Minor Victims: 2 girls

#### Overall Sentences from District Courts:

2024 Sentencing, the length of the prison sentence imposed:

- Conditional Suspensions: 2 sentences
- Up to 2 years: 8 sentences under Article 189a §1
- 3 years: 1 sentence under Article 189a §1
- 3 years: 1 sentence under Article 189a §2
- 3-5 years: 3 sentences under Article 189a §1

- 3-5 years: 1 sentence under Article 189a §2

2023 Sentencing, the length of the prison sentence imposed:

- Conditional Suspensions: 1 sentence
- Up to 2 years: 3 sentences under Article 189a §1
- 2-3 years: 1 sentence under Article 189a §1
- 3 years: 1 sentence under Article 189a
- 3-5 years: 11 sentences under Article 189a §1
- 5-10 years: 1 sentence under Article 189a §1
- 10 years: 1 sentence under Article 189a §1

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

Currently, such statistical data is not collected as part of statistical reporting.

- Number of convictions of legal entities for THB.

Currently, such statistical data is not collected as part of statistical reporting.