

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

**G R E T A**

Group of Experts on Action  
against Trafficking in Human Beings

GRETA(2023)11\_SRB\_rep

Reply from Serbia  
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

Reply submitted on 1 October 2025

## 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

<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 1 – Addressing vulnerabilities to trafficking in human beings**

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

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

The Government of the Republic of Serbia has identified the following vulnerable population groups, through strategic documents and current policies, who are at greater risk of social exclusion and poverty: people with disabilities, children, youth, women, the elderly, Roma men and women, the LGBTI community, uneducated people, the unemployed, people from the migrant population, refugees and internally displaced persons, and the population living in rural areas.

The most common causes that contribute to a person entering a situation of human trafficking may be poverty, unemployment, experience of domestic violence or neglect and lack of timely protection, discrimination. Many of these causes of vulnerability are the subject of planning documents, such as the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2029 (hereinafter referred to as: the Programme), the Strategy for the Development of Education and Upbringing of the Republic of Serbia 2030, the Strategy for the Social Inclusion of Roma Men and Women for the period 2020-2030, the Employment Strategy for the period 2021-2026, the Strategy for Prevention and Protection from Discrimination for the period 2022-2030, the Strategy for Gender Equality 2021-2030, and others.

The Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2029 provides for measures related to improving the regulatory framework for combating human trafficking, improving the system for identifying victims of human trafficking, improving protection and assistance to victims of human trafficking, improving the prevention of human trafficking in vulnerable groups, improving the fight against human trafficking at the local level, as well as strengthening systemic cooperation and coordination in the field of combating human trafficking at the national level. Considering that the prevention of human trafficking involves a whole range of activities that need to be implemented in order to reduce the impact of causes that contribute to the vulnerability of individuals and groups to human trafficking and discourage demand for products and services resulting from human exploitation, the Programme provides for preventive activities with a special emphasis on the prevention of child trafficking and human trafficking for the purpose of labour exploitation, raising the level of information and knowledge to recognise human trafficking and recognize signs that a specific situation may develop into human trafficking, as well as on available protection options.

Also, the Strategy for the Development of Education and Upbringing of the Republic of Serbia 2030 (hereinafter referred to as: SDEURS) recognises the following vulnerable groups: children, pupils and students whose families have a low socio-economic status, members of the Roma nationality, especially those living in Roma settlements, people with developmental disabilities and disabilities, residents of rural areas, especially residents of hilly and mountainous and border areas, etc.

According to a report by the Centre for the Protection of Victims of Human Trafficking,<sup>4</sup> which keeps records of victims of human trafficking, particularly vulnerable categories include women, children, migrants, people with intellectual and mental disabilities, people at risk of poverty, and people with a low level of education. During 2024 and 2025, in the largest number of detected cases, exploitation took place in the territories of Belgrade, Novi Sad, Vršac and Zrenjanin, while statistics by geographical region were not kept for the previous period. Ten victims were exploited outside Serbia during 2024.

The percentage of children among formally identified victims in 2022 was 40%, in 2023 it was 62%, in 2024 it was 49%, while in the period January – July 2025 it was 46%.

Children are most often exploited through forced begging, criminal activity, sexual exploitation, labour exploitation, and forced marriage.

Children without parental care are also particularly vulnerable while they are in social care institutions, as well as those living in foster or kinship families. Six of the identified children were in care while they were exploited (the exploitation itself took place outside the institutions), and two children were in care before exploitation.

During 2024, the Centre, in cooperation with the Church World Service organisation, developed an intensive support programme for children without parental care, with the aim of preventing their exploitation, and we are in the process of advocating for its implementation in Serbia.

Children with behavioural problems are at risk of exploitation through coercion to commit criminal acts. During 2024, five children were identified who were exploited through coercion to commit criminal acts, and these were boys who had previously had behavioural problems, which were used during recruitment, while one case was recorded in 2025.

Children from the Roma population are at high risk of exploitation through forced begging. Forced marriages are much more common in this population, which increases the risk of human trafficking. Girls sold for marriage are often abused multiple times. In the period from 2022 to July 2025, 12 girls were identified as being exploited in forced marriage.

The gender structure has not changed significantly in recent years. The percentage of women among identified victims is high. In 2022, there were 68% women, in 2023 72%, in 2024 69%, and in the period January – July 2025 75%, which indicates gender-based violence. They are most often victims of sexual exploitation, but are also affected by all other forms of human trafficking.

According to the type of exploitation, men are mainly exploited for work, through coercion into begging or into committing criminal acts.

During 2022 and 2023, six victims of human trafficking from mixed migration were identified, in 2024, 16 victims, and in 2025, in the first six months, eleven victims. During 2024, a significantly higher number of victims from mixed migration were identified.

## **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);**

---

<sup>4</sup> <https://centarzztlj.rs/statisticki-podaci/>

In 2019, the National Coalition to End Child Marriage was formed, with the aim of contributing to the end of child marriage in Serbia, especially among the Roma population, through targeted and coordinated action by relevant stakeholders.<sup>5</sup> In the period from January 2022 to June 2025, a conference “Child Marriage is Not a Roma Tradition” was held with the support of the Roma Women’s Network of the Republic of Serbia, followed by a public hearing “Every Child Has the Right to a Childhood, Let’s Stop Child Marriage” at which the results of the Roma Women’s Network’s research on child marriage and the initiative for amendments to legal acts in this area were presented (April 2023, in the National Assembly) organised by the citizens’ association “Praxis”, as well as the conference “Prevention and Elimination of Child Marriage and Economic Empowerment of Roma Women at the Local Level”. Since 2022, the National Coalition has been publishing a “Newsletter” promoting activities and plans in the field of preventing early and forced child marriage.

In May 2022, the Plan for the Protection of Children in Street Situations from Violence, Neglect and Exploitation in the Republic of Serbia was signed, prepared at the initiative of the Ministry of Internal Affairs in cooperation with the Ministry of Family Care and Demography, the Ministry of Labour, Employment, Veteran and Social Affairs, the Republic Public Prosecutor’s Office and the City of Belgrade (Secretariat for Social Protection of the City Administration of the City of Belgrade and the Belgrade Children’s Shelter), which is aligned with General Comment No. 21 on children in street situations of the Committee on the Rights of the Child.

The Ministry of Education is making additional efforts to activate the educational role of schools, improve parental skills and competencies in the areas of health and sexual education. Part of these efforts contribute to the prevention of early marriages and teenage pregnancies.

According to the MICS (2020) survey,<sup>6</sup> the practice of child marriage mainly affects girls from Roma settlements, while it is marginal in the general population.

- 0.8% of women from the general population aged 15-49 – married before the age of 15;
- 16.9% of women from Roma settlements aged 15-49 – married before the age of 15;
- 0.2% of women from the general population aged 15-17 – married before the age of 15;
- 15.2% of women from Roma settlements aged 15-17 – married before the age of 15;
- 6.8% of girls in the general population were married before the age of 18
- 57% of women from Roma settlements married before reaching the age of majority.

The Statistical Office of the Republic of Serbia and UNICEF in Serbia have begun preparations for the implementation of the seventh cycle of the Multiple Indicator Cluster Survey – MICS 7. The seventh cycle of the MICS in Serbia, including field implementation, will be conducted during 2025.

As measures to reduce the vulnerability of children to human trafficking, the Ministry of Education is implementing support measures for affirmative enrolment in preschool institutions, enrolment in primary schools without documentation, pedagogical assistants as a support measure, free textbooks, measures to prevent and curb dropout, segregation and discrimination, affirmative enrolment in secondary schools, scholarships, affirmative enrolment in higher education institutions.

The Commissariat for Refugees and Migration in the Republic of Serbia continuously educates employees through mandatory training that includes familiarisation with harmful customs that are applied in the countries of origin from which migrants come in order to protect all beneficiaries, especially children, from the influence and harmful practices such as child, early forced marriages, etc.

---

<sup>5</sup> <https://www.srbija.gov.rs/vest/366905/osnovana-nacionalna-koalicija-za-okoncanje-decijih-brakova.php>

<sup>6</sup> Multiple Indicator Cluster Survey

Support in the work is also provided by cultural mediators who are present in the centres and recognize risks in order to reduce vulnerability and take protective measures. In cooperation with specialised civil society organisations, thematic workshops are organised to raise awareness of the risks of human trafficking and other forms of exploitation and harmful practices, both among children, parents and the migrant community in asylum centres and reception centres. Beneficiaries are informed about the preventive measures and protection mechanisms that are available during group info sessions and individual counselling.

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

The Ministry of Education and UNICEF implemented the project “Bridging the Digital Divide for the Most Vulnerable Students” which is one of the projects whose results significantly improve the accessibility and quality of education for students at increased risk of dropping out. 30 primary schools with the highest number of Roma students were included, with an average of 50% Roma girls in each school. Results: schools received digital equipment, a total of 1,890 tablets and 60 laptops, and a concept of digital technology libraries (DTL) was developed. The total number of students covered by the activities is 3,111 students, and psychosocial support was provided to almost 3,000 students. 142 professional associates (school psychologists and pedagogues) attended the accredited training for providing psychosocial support, created within the project. School psychosocial support plans are being implemented, and project activities continue.

As part of the project “Together and Safely Through Childhood”, which the Ministry of Education is implementing in cooperation with the Ministry of Internal Affairs and other partners, in the 2023/24 school year, 10,881 interactive workshops on the topic “Prevention of Peer Violence in Real and Digital Environments” were implemented in primary schools throughout the Republic of Serbia. During the 2024/25 school year, a total of 30,503 workshops were implemented with students, of which on the topic “Prevention of Peer Violence in Real and Digital Life” – 2,503 workshops for 52,234 fifth-grade students. As part of the Kahoot quiz, which is implemented at the beginning and end of the workshop, the percentage of correct answers related to recognition and ways of protection from discrimination and violence increased by more than 20%. Within the same project, other workshops related to safe behaviour on the Internet are also being implemented. The workshops were implemented by 1,679 police officers and firefighters with the support of 23,453 school representatives. We will continue with the implementation in the 2025/26 school year.

In addition to the mandatory preventive activities that employees implement in schools based on the developed annual prevention programmes that also include the prevention of human trafficking, during the reporting period, educational materials were also developed and made available to children, parents and employees on the National Platform “I Protect You”, which was established by the Government of the Republic of Serbia in 2021 with the aim of strengthening intersectoral cooperation between competent institutions in protecting children from all forms of violence.

Training courses on the prevention of digital violence are available on the “I Protect You” platform (data refers to the reporting period from 2023 to July 2025), as follows:

- The training “Safe Use of Digital Technology – Prevention of Digital Violence” is intended for employees in educational institutions, in order to improve the skills of employees to strengthen digital competencies and develop students’ digital literacy, i.e., the ability of students to react adequately if digital violence occurs. During the reporting period, nearly 19,512 employees attended the training.
- The training “Safe Use of Digital Technology and the Role of the Family” allows parents to learn what digital violence is, who online predators are and what the family should do to protect

their child from threats in the digital world. The training was attended by 4,144 parents during the reporting period.

- The training “How to protect myself and others on the Internet” – is intended for students with the aim of introducing them to the most common risks in the digital world, including online predators, as well as how to act in situations of digital violence. During the period 2023 – July 2025, 5,641 students attended the training.

Also, the “Skills for Adolescence” programme, which the Ministry of Education has been implementing since October 2023, in cooperation with the United Nations Office on Drugs and Crime (UNODC), involves improving the competencies of employees for the development of students’ socio-emotional skills. Representatives from all 17 school administrations, 366 employees from 180 primary schools, who attended the training during 2024 and 2025, implemented project activities with their sixth and seventh grade students through a series of workshops that address topics that are specifically related to the development of students’ socio-emotional skills: The path of adolescence, self-confidence and communication skills, emotional regulation, peer relationships, family relationships, healthy choices and goal setting, etc.). The goal of the programme was to create an accepting and supportive school environment through the development of assertive communication skills, responsible decision-making and self-awareness (of one’s own attitudes, values and needs), as well as strengthening self-confidence.

In addition to the above programme, and in order to improve the competencies of employees for the development of students’ socio-emotional skills, a video training was developed in cooperation with the Centre for Interactive Pedagogy “Upbringing and Social-Emotional Learning for the Well-Being and Comprehensive Development of Children” at the end of 2024. To date, 10,305 school employees have been introduced to the content of the training. During the reporting period, the training was also posted on the National Platform “I Protect You” for the purpose of greater accessibility. To date, 3,578 school employees have attended the training through the Platform.

The employee training, which was created during 2023 – “The Role of Educational Institutions in Combating Human Trafficking” was attended by 17,781 employees by March 2025.

In order to empower parents to face the challenges that exist in the digital space, as well as other adults involved in the upbringing and education of children, the publications “Digital Literacy”, “Social Networks” and “Artificial Intelligence” were published in 2025. The publications were published as part of the “Digital Compass for Parents” edition, with which the Ministry of Education, the Ministry of Information and Telecommunications, the Centre for Educational Policies, UNICEF and the Yettel company seek to support parents in facing the challenges of digital parenting. The aim of the edition is to empower parents to actively support children in the constructive use of information and communication technologies and in the prevention of risky behaviour in the digital environment.

The brochures contain clear explanations of key terms, practical advice, pointing out the risks, but also the potential of social networks, artificial intelligence tools and the importance of digital literacy. The aim of the publications is to help parents bridge the digital divide and develop open and supportive communication with children about their digital experiences. The publications are also published on the website of the Ministry of Education.<sup>7</sup>

All children residing in asylum and reception centres are included in all levels of education, and primary school education is mandatory for all children regardless of whether they have a regulated

---

<sup>7</sup> <https://prosveta.gov.rs/kategorija/publikacije/>



residence status in the Republic of Serbia. In all centres where children reside, children's spaces and classrooms have been established, where children receive daily support in mastering school material, attend workshops and classes for developing life skills, building resilience, and support is also provided to parents.

The Serbian Red Cross has created and implemented a series of interactive workshops across Serbia for children and youth with the aim of protecting personal data and information on social networks, and how to use the internet safely. These workshops are part of the Preventive Package – information workshops, which are implemented with children and youth continuously throughout the year, on the territory of the Republic of Serbia.

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

Within the National Platform for the Prevention of Violence against Children “I Protect You”, the “Contacts for Citizens” component has been established, which is a software system for electronic reporting of violence that can be used free of charge by children, citizens and competent state authorities and institutions. The aforementioned system enables electronic reporting of all forms of violence against children, which is forwarded to the competent system through the system, and the applicant can at any time on the Platform to be informed about the status and outcome of the report. A banner and a link for direct connection to the Platform have been placed on the website of the Ministry of the Interior. Data on the number of reported incidents with elements of violence against children received through the “I Protect You” software system.<sup>8</sup>

The “I Protect You” platform also integrates the National Contact Centre for Child Safety on the Internet “Smart and Safe”, which promotes the development of digital literacy, digital competencies and digital safety culture and enables reporting of various forms of online endangerment of minors. It cooperates with the Prosecutor's Office for High-Tech Crime, the police, educational institutions, social work centres and health centres.<sup>9</sup>

Police officers of the Ministry of the Interior participate in the work of the “Find Me” emergency public notification system in the event of a missing minor.

A report of a suspected victim of human trafficking can be reported to the Centre for the Protection of Victims of Human Trafficking on the 24/7 hotline, electronically to the Centre's email address, or via the mobile application.

During 2024, the Centre for the Protection of Victims of Human Trafficking, with the support of the International Organisation for Migration, developed an application for the preliminary identification of victims of human trafficking. The application is available on “Google Play” and is intended for employees of the social protection system and the Commissariat for Refugees and Migration, while the user group will be able to expand later. Users of the application use officially adopted indicators for preliminary identification, which are divided into two lists – for children and adults, which are gender and culturally sensitive and cover all forms of exploitation. After marking the indicator, the user receives a notification about the level of risk of human trafficking and brief instructions for further action, and then the opportunity to register in the Centre's software, the ability to monitor the action taken on the report, as well as receiving feedback from experts from the Centre.

The Ministry of Education has detailed the legal and bylaws for dealing with all forms of violence, including human trafficking, or child trafficking. Employees in educational institutions are required to

<sup>8</sup><https://app.powerbi.com/view?r=eyJrIjoieTE4YzdlZWQtN2ExNi00ZDUwLWI2M2EtY2M0YzU0MGYzODBhIiwidCI6ImU5ODY5ZDIILTVmMTYtNDE1Ni04OWIwLWQ1MjYzMGZmNzAwMCIslmMiOjI9>

<sup>9</sup> <https://www.pametnoibezbedno.gov.rs/>

act in accordance with the Regulation on the Protocol of Action in Institutions in Response to Violence, Abuse and Neglect.<sup>10</sup>

Educational institutions have a role in the process of preliminary identification of victims of human trafficking. Preliminary identification refers to the assessment of the existence of risk, i.e., suspicion that a student is a victim of trafficking, but does not imply formal verification that the student is a victim of human trafficking. In accordance with the Rulebook, the director of the institution is obliged, if there is suspicion or knowledge that a student is involved in any form of human trafficking, to notify the service responsible for identification and support of victims of human trafficking, i.e., the Centre for Protection of Victims of Human Trafficking, the competent Centre for Social Work and the police. The educational institution informs the Ministry of Education, i.e., the competent school administration, about the situation and the activities undertaken. When assessing the situation, it is important to apply the revised List of Indicators for the Preliminary Identification of Students Who Are Potential Victims of Human Trafficking, which, in accordance with the identified indicators, provides guidelines for employees for further action.<sup>11</sup>

In recent years, the Ministry of Education has been intensively undertaking a number of activities in the field of protection against human trafficking, namely children and youth. After revising the list of indicators for the preliminary identification of victims of human trafficking for the education system and developing a guide for their application in cooperation with the Council of Europe Office in Belgrade, during 2021/2022 as part of the project “Strengthening the fight against human trafficking in Serbia”, the Ministry of Education continued with activities related to raising awareness of employees in the education system and empowering them to apply the list of indicators and implement preventive activities when it comes to this complex topic.

In addition to the above activities, the Ministry of Education has additionally taken systemic measures to respond promptly and report suspicions of human trafficking, and within the framework of the latest amendments to the Rulebook on the Protocol of Action in Institutions in Response to Violence, Abuse and Neglect,<sup>12</sup> it specified the actions of employees in the education system and the obligation to implement the list of indicators for the preliminary identification of victims of human trafficking and the guidelines for action defined within the aforementioned list.

In addition to the above-mentioned prescribed procedure in the education system, since May 2023, the National Platform “I Protect You” has enabled every citizen to report any form of violence or discrimination involving children. All competent systems that act to protect children from violence are part of the National Platform.

The Law on Health Documentation and Records in the Field of Health,<sup>13</sup> which has been in force since 4 November 2023, prescribes health documentation and records in the field of health, which are required to be kept, in the manner and according to the procedure prescribed by this Law, by all health institutions, private practices and other legal entities that are required by a special law to perform health care activities, i.e., all health care providers in the Republic of Serbia in accordance with Articles 1 and 3 of this Law.

Keeping prescribed health documentation and records is an integral part of professional medical work and is an obligation of all health institutions, private practices and other legal entities that are required

---

<sup>10</sup> <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2024/11/6/reg>

<sup>11</sup> <https://indikatori.prosveta.gov.rs/anketa>

<sup>12</sup> [https://www.paragraf.rs/propisi/pravilnik\\_o\\_protokolu\\_postupanja\\_u\\_ustanovi.html](https://www.paragraf.rs/propisi/pravilnik_o_protokolu_postupanja_u_ustanovi.html)

<sup>13</sup> <https://www.paragraf.rs/propisi/zakon-o-zdravstvenoj-dokumentaciji-i-evidencijama-u-oblasti-zdravstva.html>

by a special law to perform health activities, as well as health workers, health associates and other persons authorised to record, collect, handle and process data in accordance with Articles 5 and 11, paragraph 1 of the Law on Health Documentation and Records in the Field of Health.

Healthcare providers are obliged, when providing healthcare services, to keep a Book of Records on Suspected Child Abuse and Neglect, in accordance with Article 25, Paragraph 1, Item 25 of the Law on Health Documentation and Records in the Field of Healthcare.

When providing health services, all health care providers are obliged to, in any case of suspicion of child neglect and abuse, compile an individual report, which is submitted electronically to the territorially competent public health institute and the Institute of Public Health of Serbia “Dr Milan Jovanović Batut” in accordance with Article 30, paragraph 1, item 26) and paragraph 2 of the Law on Health Documentation and Records in the Field of Health.

The Institute of Public Health of Serbia “Dr Milan Jovanović Batut”, based on the submitted individual reports, forms appropriate databases, and delivers the processed aggregate data to the competent authorities and makes it available to the public in accordance with Article 32 of the Law on Health Documentation and Records in the Field of Health.

Data from medical records represent particularly sensitive personal data, which all healthcare providers are obliged to collect and process in a manner that ensures the confidentiality of patient personal data, in accordance with the law governing patients’ rights and the law governing the protection of personal data in accordance with Article 38 of the Law on Health Records and Records in the Field of Healthcare.

All healthcare providers are obliged to protect medical documentation and patient records from unauthorised access, inspection, copying and misuse, regardless of the form in which the data from the medical documentation is stored, in accordance with Article 52, paragraph 2 of the Law on Health Documentation and Records in the Field of Healthcare.

In accordance with the above, reports on suspected child abuse and neglect contain data on established diseases or conditions, measures taken in the field of health care, but do not contain personal data. The purpose of data processing in reports referred to in paragraph 2 of this article is to monitor the health of the population, plan and effectively implement measures aimed at preserving public health, as well as reporting to the public and international bodies in the field of health.

In 2018, the Ministry of Health created a Special Protocol of the Health Care System for the Protection of Children from Abuse and Neglect,<sup>14</sup> which is intended for all health care providers in the Republic of Serbia.

The purpose of the Special Protocol is to provide health care providers with guidelines on how to act in cases of suspected child abuse and neglect. According to the said protocol, child abuse can manifest itself as physical, sexual, emotional (psychological) and exploitation of the child.

For each type of abuse, the Special Protocol provides definitions and examples, as well as specific physical, behavioural, social, and emotional indicators of abuse.

---

<sup>14</sup> [https://www.zdravlje.gov.rs/view\\_file.php?file\\_id=877&cache=sr](https://www.zdravlje.gov.rs/view_file.php?file_id=877&cache=sr)

Digital violence is also listed as a special form of violence, which is described separately, with indicators of digital violence listed, as well as instructions for action. The National Contact Centre for Child Safety on the Internet began operating in 2017, since when threats to the safety of children on the Internet can be reported by calling 198-33, sending an email, or using the electronic form on the website [www.pametnoibezbedno.gov.rs](http://www.pametnoibezbedno.gov.rs). Upon receipt of the report, the appropriate notification is delivered to the website administrator and the report is forwarded to the competent authorities – the social work centre, the health centre, the information security inspection, the public prosecutor's office (in case of suspicion of a criminal offence), as well as the High-Tech Crime Service of the Ministry of the Interior.

Health workers and health care professionals are often among the first to whom a child or their loved ones turn for help in situations where a child is injured, exhibits behavioural disorders, and has difficulty controlling emotions. Therefore, they are in a position to effectively and promptly identify the risk or detect child abuse and neglect, as well as to initiate a process of providing assistance that will protect the child.

Every healthcare worker and healthcare associate is obliged to recognize, provide care and, in case of suspicion of abuse and neglect, take measures prescribed by the Special Protocol of the Healthcare System on the Protection of Children from Abuse and Neglect.

A health care institution that deals with the health care of children is obliged to form an Expert Team for the Protection of Children from Abuse and Neglect (hereinafter referred to as: Expert Team), and a private practice is obliged to form one whenever possible. If a private practice does not have the conditions to form an Expert Team, the founder of the private practice is obliged to report suspected abuse and neglect to the competent authorities.

The professional team is formed based on the specifics of the institution. The optimal team consists of a paediatrician, a paediatric nurse/technician, a visiting nurse, a psychologist and a social worker, who is the coordinator of the team's work. When it is not possible to form an optimal team, minimal teams are formed, consisting of a paediatrician and a nurse/technician. In institutions where there are staffing conditions, the Professional Team also includes doctors from other specialties (gynaecologists, emergency medicine specialists, forensic medicine specialists, etc.).

The principle of the best interests of the child in cases of abuse and neglect takes precedence over the maintenance of professional secrecy. In this regard, all relevant information related to child abuse and/or neglect is transmitted to the prosecutor's office, the court and the Centre for Social Work. Any suspicion of child abuse and neglect is reported to the competent Centre for Social Work, the police or the public prosecutor.

Recognising the need to strengthen the healthcare system to identify and treat victims of human trafficking, including child victims of human trafficking, the Draft Law on Suppression and Prevention of Human Trafficking includes a legal basis for the adoption of a by-law – the Protocol on the Treatment of Victims of Human Trafficking by the Healthcare System, which is prescribed by the Minister of Health.

The Ministry of Health, with the support of the International Organisation for Migration (IOM), developed national indicators for the preliminary identification of victims of human trafficking in the health care system, as well as a manual for the application of these indicators, which were presented to relevant institutions on 20 February 2025.

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

Over the past three years, over 2,000 professionals from various systems (police, prosecutor's office, social protection system, labour inspectorate, healthcare, civil society organisations, Red Cross representatives, etc.) who may come into contact with child victims of human trafficking have been trained. The trainings were implemented by representatives of relevant state institutions and civil society organisations from the budget of the Republic of Serbia, as well as with the support of projects of international organisations, on the following topics:

- "The role of social work centres in preliminary identification and support for victims of human trafficking",
- "Preliminary identification and support for victims from the migrant population",
- "Identification and protection of refugees and migrants who are victims of human trafficking",
- "Practitioners in the fight against human trafficking with a special focus on migration",
- "Prevention and suppression of trafficking in human beings for the purpose of labour exploitation",
- "Suppression of labour exploitation",
- "Preliminary identification of victims of human trafficking in the healthcare system",
- "The role and networking of actors in identifying, providing support and preventing retraumatisation of victims of human trafficking and other vulnerable groups",
- "Application of indicators for preliminary identification of students at risk of human trafficking for educational workers",
- "Recognising cases of human trafficking and providing support for volunteers and associates of the Serbian Red Cross",
- "Using an app to identify cases of human trafficking"
- "Recognising human trafficking cases for the police"
- "Detecting, preventing and combating human trafficking",
- "Ethical media reporting in cases of human trafficking".

The Ministry of the Interior is implementing the specialisation of police officers, by establishing specialised units within the police to combat human trafficking, with a special focus on minor victims, by holding regular training and professional development of police officers in the field of child rights, victim psychology and communication techniques with children, as well as by implementing special protocols for working with child victims (e.g., without the presence of the perpetrator, with the support of a psychologist).

In 2025, the Ministry of Labour, Employment, Veteran and Social Affairs, in cooperation with the Centre for the Protection of Victims of Human Trafficking, is implementing the training "Recognising Cases of Human Trafficking and Supporting Victims" in 25 districts, as part of the project "Western Balkans Joint Action Against Smuggling of Migrants and Trafficking in Human Beings", implemented by the International Organisation for Migration and the German Development Cooperation project "Support for Social Inclusion in Serbia". The trainings are multi-sectoral and are intended for professionals for the preliminary identification of victims of human trafficking (judiciary, police, education, healthcare, social protection, civil sector, etc.). By the end of July 2025, 15 trainings were implemented in 15 districts for about 800 participants. During October and November 2025, another 10 trainings are planned.

The republican and provincial social protection institutes, within their mandate, provide expert support in working on individual cases at the request of social work centres. They also implement various forms of professional development for social protection experts, and accordingly, in 2024, an expert meeting was held in the form of a round table with the aim of providing expert support to supervisors from small social work centres from the territory of the Autonomous Province of Vojvodina on the

topic “The role, tasks and responsibilities of supervisors / case managers in the protection of child victims of human trafficking – child marriage”.

Following the revised List of Indicators for Preliminary Identification of Human Trafficking in the Education System in 2022, the Ministry of Education continued its activities aimed at empowering employees to act in situations of suspicion or knowledge that a student is a potential victim of human trafficking. Therefore, training was implemented in 2023 and 2024 for 76 advisors of external collaborators for protection against violence from 17 school administrations (organisational units of the Ministry of Education) in cooperation with the Council of Europe Office in Belgrade as part of the project “Strengthening the Fight against Human Trafficking in Serbia” (2023-2026). Upon completion of the training, employees within their school administrations were tasked with implementing activities with employees in schools from their territories to implement the training content and present the indicators.

In order to empower employees to early identify risk factors in students that may lead to human trafficking and to act in situations of suspicion or knowledge of the potential involvement of students in the trafficking chain, during November and December 2024, in cooperation with the International Organisation for Migration (IOM) and the Institute for the Improvement of Education and Training and financial support of the European Commission (IPA III programme), 10 distance training courses were implemented, attended by a total of 1,200 participants. The training was created to continue the process of implementing in schools the revised List of Indicators for the Preliminary Identification of Students Who Are Potential Victims of Human Trafficking for the Education System. During the training, employees had the opportunity to learn about the complexity of the phenomenon of human trafficking, to apply indicators through descriptions of situations of human trafficking, i.e., child trafficking, as well as to plan preventive activities that they would implement in their schools with students. Examples of good practice are available to employees on the website of the Ministry of Education.<sup>15</sup> Part of the training content specifically addresses risk factors/vulnerability factors and sensitive social groups, such as migrants, who may be at greater risk of becoming victims of human trafficking.

Within the same project, and in order to provide additional support to employees in the education system for the implementation of the list of indicators, an additional mechanism, an application, was developed.<sup>16</sup> Through the application, school employees, after marking the indicators identified in the students, the programme as a result, in accordance with the number of identified indicators in relation to the entire list, at the very end of the assessment, provides clear guidelines to employees for further measures and activities within the school and directs employees to which competent systems they can contact – the Centre for the Protection of Victims of Human Trafficking, the competent centre for social work, the police, the prosecutor’s office.

In addition to the above activities, since the very beginning of the work of the National Platform “I Protect You”, the Ministry has continuously participated in the creation of the informative and educational part of the platform and training content for employees, parents and students in the field of prevention of various forms of violence (including human trafficking, i.e., child trafficking) and discrimination. Currently, the Platform has 22 training courses, and more than 440 information and educational content has been published, which are available to the general public, in the field of prevention of various forms of violence, discrimination and risky behaviour of children, ways of

---

<sup>15</sup> [https://remis.rs/dobre\\_prakse/3311/](https://remis.rs/dobre_prakse/3311/)

<sup>16</sup> <https://indikatori.prosveta.gov.rs/>

providing support to children and ways of reacting in situations when a certain situation of violence/discrimination occurs.<sup>17</sup>

There are currently three training courses on the National Platform. During 2024, two new training courses (for students and parents) were created that specifically address the topic of human trafficking – prevention and action in situations of suspicion or knowledge of human trafficking. In cooperation with the Centre for the Protection of Victims of Human Trafficking, training courses were created for students and parents aimed at raising awareness of the complexity of the phenomenon of human trafficking, its forms, risk factors and methods of protection. The training for students – “Human Trafficking – Prevention, Recognition, Reporting and Support” was attended by 633 students by March 2025, and the training for parents – “Human Trafficking – Prevention, Recognition, Support” was attended by 3,362 parents. A total of 18,512 employees attended the employee training, which was created during 2023 – “The Role of Educational Institutions in Combating Human Trafficking” during the reporting period (2022 – June 2025).

One of the priority areas in the Catalogue of Continuous Professional Development Programmes for Teachers, Educators and Professional Associates for the 2022/2023, 2023/2024 and 2024/2025 school years<sup>18</sup> is “Improving Digital Competencies and the Use of Information and Communication Technologies in the Implementation of the Educational Process”. The current Catalogue contains 180 accredited programmes that address the strengthening of digital competencies of employees in the education system, as well as 7 accredited programmes with the theme of interculturality, 5 programmes with the theme of gender equality, and the theme of protection from discrimination is represented by 20 programmes. During the implementation period of the Catalogue (2022-24), 1,475 employees from the education system attended training on the topic of protection against discrimination, 2,642 participants attended training on the topic of interculturality, and 200 participants attended the topic of gender equality. These topics indirectly contribute to strengthening the competencies of employees in the education system for action in the field of prevention of trafficking in children and young people. The Serbian Red Cross conducts trainings, lectures and workshops with the aim of raising awareness about the problem of human trafficking, and the types of preliminary identification of victims based on general and specific indicators. The activities are aimed at staff and students who may come into contact with victims of human trafficking in their work or future work. The trainings are not accredited, but professionals from various fields who are themselves most often Red Cross volunteers attend them and acquire basic information about the need to respond to human trafficking.

Target group	2022	2023	2024	2025	Total
Parents	902	839	339	172	2252
Representatives of the media	105	82	29	8	224
Health workers	138	66	28	34	266
Education workers	466	481	352	125	1424
Representatives of local self-government	122	67	33	1	223
Other, including students	186	107	71	14	378
<b>Total</b>	<b>1919</b>	<b>1642</b>	<b>852</b>	<b>354</b>	<b>4767</b>

In 2025, the Commissariat for Refugees and Migration, in cooperation with UNICEF, developed special curricula: “Protection of Children in Emergency Situations” and “Gender-Based Violence” intended for work with the migrant population, for which trainers with many years of experience

<sup>17</sup> <https://cuvamte.gov.rs/>

<sup>18</sup> <https://zuov-katalog.rs/>

working in social work centres, education, the Commission for the Protection of Equality, specialised civil society organisations and the Commissariat were trained.

The first in a series of trainings on “Protection of Children in Emergency Situations” was attended by 18 participants who carry out activities with children at the Obrenovac Asylum Centre, including the medical team of the health centre, field workers of the social work centre, representatives of the Municipality of Obrenovac, engaged in the Commissariat for Refugees and Migration, and representatives of civil society organisations that carry out activities at the centre. Two more such trainings are planned for other centres managed by the Commissariat for Refugees and Immigration, where unaccompanied children and minors reside.

The Standard Operating Procedures for Treating Victims of Human Trafficking are included in the basic training of employees of the Commissariat for Refugees and Migration: “Procedures of Employees in Asylum Centres and Other Facilities Intended for the Accommodation of Asylum Seekers”, which the Commissariat conducts for all employees. This training was attended by 70 people in 2023, 50 employees in 2024, and 14 newly hired people in the first 6 months of 2025.

Also, in the reporting period, a total of 132 employees of the Commissariat for Refugees and Migration (employees in asylum centres and other facilities intended for the accommodation of asylum seekers) attended training courses, which, among other things, also related to children, on the following topics:

- “Review of measures to safeguard user protection with a focus on preventing exploitation and abuse”,
- “Practitioners in the fight against gender-based violence and human trafficking with a special focus on migration”,
- “Use of indicators for preliminary identification and support to persons at risk”,
- “Use of indicators for preliminary identification of victims of human trafficking and provision of support to persons at risk”,
- “Reception of vulnerable categories: identification of vulnerabilities and provision of basic support” – within the framework of the EU Asylum Agency,
- “Persons with special needs and unaccompanied minors in the reception and asylum procedure” – within the EU Asylum Agency,
- “Fighting human trafficking”,
- “Recognising cases of human trafficking and supporting victims”.

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

The right to education is both a soft measure that enables the exercise of other human and child rights, but it is also a kind of prevention of risky behaviour. Education brings sustainable social inclusion and breaks the cycle of poverty, which is why the Ministry of Education is actively improving access to and quality of education for all children, with a focus on vulnerable social groups, such as children and students from the Roma nationality and migrants, asylum seekers and refugees.

During the reporting period 2022-2025, continuous support measures for children and students of Roma nationality continued:

- Affirmative enrolment in preschool, as well as in primary school, is provided to children of Roma nationality who do not have the necessary documents.
- Affirmative action measures for the enrolment of Roma students in secondary schools are a systemic measure defined by a by-law.



Table: Number of students of Roma nationality enrolled in secondary schools using affirmative measure, by school years

School year	Number of students enrolled in secondary schools through affirmative action	% of girls
2022/23	2,451	49%
2023/24	2,511	51%
2024/25	2,502	52%

So far, over 23,000 students of Roma nationality have benefited from this measure.

Scholarships as a measure of support for pre-university education of Roma – Over the last 9 school years, a total of 9,834 scholarships have been awarded to Roma secondary school students, of which 59-65% are girls.

Table: Number of student scholarships awarded to students of Roma nationality, by school year

School year	Number of student scholarships awarded to students of Roma nationality	% of girls
2022/23	1,120	62%
2023/24	1,084	59%
2024/25	1,097	65%

For the last 6 years, the Ministry of Education has been announcing a special competition<sup>19</sup> from budget funds within the general competition for student scholarships and loans, which is intended for members of the Roma national minority.

Pedagogical assistant (PA) as a support measure – a continuous support measure for 25 years. Pedagogical assistant (PA) as a support measure – A total of 281 PAs have been hired so far (financed from the local and national levels), 239 in primary schools, 10 in secondary schools, 32 pedagogical assistants in preschool institutions. The PA network is expanding every school year. The Ministry of Education has engaged 55 new PAs for the last 4 school years (2021/22, 2022/23, 2023/24, 2024/25). All PAs are provided with free distance learning (financed from the budget of the Ministry of Education). Laptops have been provided for PAs to support their field work, as well as computers for the schools in which they are engaged.

The free textbook programme as a support measure – is intended for primary school students from socially/materially disadvantaged families (recipients of cash social assistance), students with developmental disabilities and disabilities, primary school students who are the third or every subsequent child born in the family in the system. For each school year, an average of 16.5 -18% of students is covered by the free textbook programme. Our assessment is that a large part of Roma families, that is, students, are covered by this support measure; given the non-obligatory declaration on an ethnic basis, we do not have a precise insight into how many students of Roma nationality participate in this measure in percentage.

- Measures to prevent dropout from the education system – The Ministry of Education continues to continuously strengthen the competencies of employees in the education system to work in the field

<sup>19</sup> <https://prosveta.gov.rs/skolski-i-studentski-zivot/stipendije/stipendije-za-romske-ucenike-i-studente/>

of dropout prevention. Educational institutions continuously apply the early identification and response system in order to prevent dropout from the education system. The “Training for Planning, Implementation and Monitoring of Measures to Prevent Student Dropout”, which is accredited as a training programme of public interest and planned by the budget of the Ministry of Education, was attended by almost 1,000 participants from 100 primary and secondary schools during the reporting period.

Students returned under the Readmission Agreement – On average, 87-90% of students who were returned under the Readmission Agreement are enrolled in the appropriate age class. The highest concentration of returnees was recorded in the territory of the School Administration of Kraljevo, Čačak, Belgrade and Sombor, Leskovac, Zrenjanin, as well as in schools in the territory of the Novi Pazar Professional Pedagogical Supervision Group.

Table: Number of students returned under the Readmission Agreement, by school year

School year	Number of students returned under the Readmission Agreement, by school year	girls	boys
2022/23	33	12	21
2023/24	85	37	48
2024/25	43	24	19

The reason for the decrease in the number of students registered in schools as returnees under the Readmission Agreement is the affirmative action of primary and secondary schools, which continue to apply simplified procedures for the enrolment or re-inclusion in school of students who were absent from classes for a certain period of time during the school year. Additional measures: providing free textbooks, referral to cooperation with local Roma associations and cooperation of the school on civil society projects, support for the Roma PA. As a measure to support the improvement of the integration of migrants, but also other vulnerable social groups, into the education system, the elective subject Serbian as a foreign language has been introduced into the curriculum, which can be attended by students who do not know the language of instruction (returnees after readmission, migrants, refugees, foreign citizens). Useful materials for teachers can be found on the National Education Portal of the Institute for the Improvement of Education, on a special page dedicated to Serbian as a foreign language. The resources are regularly updated,<sup>20</sup> and a significant place is occupied by the improved Handbook “Serbian as a Foreign Language”, as well as the new manual entitled – Serbian as a Foreign Language – Instructional Methodological-Didactic Handbook for Teachers.<sup>21</sup>

The education of migrant students in the Republic of Serbia is one of the examples of good practice in Europe. So far, over 5,500 migrant students, asylum seekers and refugees have successively passed through the education system. The inclusion of students takes place in accordance with the Professional Instructions for the Inclusion of Migrant Students in the Regular Education System (2017). The sustainability of the education of this, socially extremely sensitive group, is reflected in the legally enabled simple process of including sensitive social groups in the compulsory primary education system without having the documentation required for enrolment, and with the submission of proof of the child’s health examination. Migrants and asylum seekers are enrolled in secondary school on a voluntary basis in those secondary school profiles in which there are vacant places after completing the second round of enrolment or (if they have mastered the Serbian language) after passing the final exam. The sustainability of migrant education is also reflected in the mentoring

<sup>20</sup> <https://zuov.gov.rs/srpski-kaio-strani-jezik/>

<sup>21</sup> <https://zuov.gov.rs/metodicko-instruktivni-prirucnik-za-nastavnike-srpski-kaio-strani-jezik/>

support implemented by mentors who are external advisors and are already in the education system and who, together with schools, respond to a number of challenges in the process of implementing inclusive practices. To improve the accessibility and quality of education for students from the migrant population, the Ministry of Education has also provided translators of educational materials into the native languages of migrants (Arabic and Ukrainian).

As support for schools where migrants are educated, the Ministry of Education has provided non-refundable funds through small grants for the implementation of curricular and extracurricular activities. These non-refundable funds motivate schools to create and implement innovative and inclusive extracurricular and curricular activities during the school year. Since 2018, more than 120 small grants have been provided, and in the reporting period 2022-2025. Students who have found themselves in a situation of forced migration are included in more than 30 primary schools and 21 secondary schools in the Republic of Serbia. During the reporting period, about 250 students from the migrant population were included in the regular education system, at the school year level, or 85-87%. Students from Ukraine who have status based on the Decision on Provision of Temporary Protection in the Republic of Serbia to Displaced Persons Coming from Ukraine make up 67-70% of the total included students from the migrant population. For migrant students who leave Serbia and were part of the education system, a school report (in Serbian and English) is prepared, which contains the level of educational competencies that the migrant student has achieved during his education in Serbia, and which represents a kind of educational passport. On average, 36-40 school reports were submitted per school year, during the reporting period 2022-2025. years, for students who left Serbia.

The Ministry of Education pays special attention to supporting sensitive categories within the migrant population, such as children and minors unaccompanied by parents/other legal representatives. Active work is underway to strengthen the competences of teachers to provide support to migrant students. So far, more than 4,000 teachers and professional associates have been covered by various trainings. In the period from October until December 2024, 15 two-day professional development trainings were implemented for employees on the implementation of the Professional Instructions for the Inclusion of Migrant Students/Asylum Seekers in the Education System and the Development of a Support Plan and Didactic Materials for Working with Migrant Students. The trainings covered 400 participants. Good practices and materials are available on the ZUOV<sup>22</sup> and REMIS<sup>23</sup> websites. With the aim of improving the competences of teachers in implementing the curriculum for the elective programme Serbian as a foreign language, 4 trainings were implemented with a total of 130 participants. So far, more than 700 teachers have improved their knowledge and skills in the field of Serbian as a foreign language. Materials with examples of good practice are available at Serbian as a foreign language | Institute for the Advancement of Education and Training and REMIS.

Examples of the involvement of students from the migrant population in extracurricular activities in schools:

<https://www.facebook.com/peta.vranje/posts/pfbid025pY3T3y0jXuXzDfrQR76V5iXAwcPbaMgpc21XQhkuQ7AspxQM4AXYRSjRLerdMKxl>

<https://hl.rs/cula-projektova-cinnost/>

<https://media.rtv.rs/ostalo/ukrajinska-panorama/97258>

[https://www.rtv.rs/sr\\_ci/vojvodina/novi-sad/obeizen-medjunarodni-dan-ljudskih-prava-u-os-jovan-popovic\\_1591457.html](https://www.rtv.rs/sr_ci/vojvodina/novi-sad/obeizen-medjunarodni-dan-ljudskih-prava-u-os-jovan-popovic_1591457.html)

[Link to the announcement of the “Sava Šumanović” High School  
REMIS.](#)

<sup>22</sup> <https://zuov.gov.rs/plana-podrske-didakticki-materijal-migranti/>

<sup>23</sup> <https://remis.rs/>

Health services, including health care services for vulnerable children, are equally available to all patients, without discrimination, as stipulated in Article 3, paragraph 1 of the Law on Patients' Rights,<sup>24</sup> which guarantees every patient an equal right to quality and continuous health care, in accordance with the patient's health condition, in the patient's best interest and with respect for the patient's personal views.

Article 6, paragraph 2 of the Law on Patients' Rights stipulates that in the process of obtaining health care, every patient has the right to equal access to health services, without discrimination in relation to any difference that may be a cause of discrimination.

Pursuant to Article 3 of the Law on Health Care,<sup>25</sup> a citizen, as well as a foreign citizen and a stateless person who is permanently resident or temporarily residing in the Republic of Serbia, has the right to health care, and a person passing through the territory of the Republic of Serbia has the right to emergency medical assistance in accordance with the Law on Health Care.

Children who are not compulsorily insured have the right to health care provided in the budget of the Republic of Serbia.

Also, Article 11 of the Law on Health Care stipulates that children, as well as victims of human trafficking, are special categories of the population covered by social health care, for which, if they are not health insured, health care is provided from the budget of the Republic of Serbia.

Article 16 of the Law on Health Insurance<sup>26</sup> stipulates that children and victims of human trafficking who are not compulsorily insured shall receive health care from the budget of the Republic of Serbia.

The Commissariat for Refugees and Migration provide all children residing in asylum and reception centres, including unaccompanied minors, with unhindered access to free health care and education. Outpatient clinics have been established in all centres, staffed by medical teams from the relevant health centres, and all persons are referred to secondary and tertiary health care levels if necessary. Interpreters and transportation are provided during health examinations, if necessary. Additionally, thematic workshops are organised for parents and children to raise awareness about health care, including vaccines, psychosocial support, etc. The Commissariat for Refugees and Migration provide assistance and support in exercising the right to education at all levels, including transportation to school and health centres for the needs of specialised screenings of children for school enrolment, interpreter services, assistance in mastering school materials (the so-called inclusive approach to education), etc.

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

Activities aimed at enabling the exercise of the right of every person to be registered in the birth register also prevent human trafficking. In doing so, special attention is paid to the registration of children in the birth register and the identification of parents in this process, as well as the education of mothers who do not have personal documents on how to exercise their rights and obtain personal documents.

The exercise of the right to birth registration implies that each child is entered in the birth register immediately after birth (the registration of the birth of a child in a health institution is carried out by that institution, and outside the health institution by the parents), with special attention being paid to

---

<sup>24</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_pravima\\_pacijenata.html](https://www.paragraf.rs/propisi/zakon_o_pravima_pacijenata.html)

<sup>25</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_zdravstvenoj\\_zastiti.html](https://www.paragraf.rs/propisi/zakon_o_zdravstvenoj_zastiti.html)

<sup>26</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_zdravstvenom\\_osiguranju.html](https://www.paragraf.rs/propisi/zakon_o_zdravstvenom_osiguranju.html)

the identification of the parents, with the aim of ensuring the legal security of the child, as well as the system as a whole. The application of standardised identification procedures in all procedures related to children's rights enables the establishment of protection mechanisms, preventing all forms of abuse, including trafficking in children and human beings. In this way, the Republic of Serbia consistently fulfils and implements the obligations assumed by the Council of Europe Convention on Action against Trafficking in Human Beings.

In cases where the mother does not have personal documents, education is provided and assistance is provided in obtaining the necessary documents in order to establish the mother's identity beyond doubt and eliminate the risks of "legal invisibility" and statelessness.

The implementation of these measures was carried out by the Ministry of State Administration and Local Self-Government in the reporting period in cooperation with the Ombudsman, UNHCR, as well as other relevant institutions, within the framework of the concluded Memorandum of Understanding, as well as through the work of the Operational Group that coordinates activities aimed at exercising the rights of persons who have not yet been registered in the birth registry.

The Working Group prepared the text of the Instructions for Proceeding in Cases of the Birth of a Child whose Parents Do Not Have Personal Documents to Enable Registration in the Birth Register, which was jointly adopted in December 2020 by four ministers whose portfolios include state administration matters of importance for the exercise of rights.

The instruction raises the efficiency of officials to a higher level so that in the case of the birth of a child whose mother does not have personal documents, they act according to the principle of urgency and the best interest of the child, initiate the procedure for identifying the mother, determining whether the mother has other children who have not been registered for birth registration, that is, have not been entered in the birth register, in order to solve the problem of so-called legal invisibility at the level of the entire family, thereby effectively eliminating the risks of statelessness.

In order to effectively implement the Instructions, trainings were held during the reporting period for maternity hospital employees who work on registering the birth of a child, as well as registrars, police officers, employees of social work centres, providers of free legal aid and refugee trustees. In addition to the trainings, information campaigns were organised at the local level, especially for vulnerable communities, in order to make information available and provide information on how to exercise the right to be registered in the birth register and on the procedure for obtaining personal documents.

All children born in the Republic of Serbia and placed in asylum and reception centres, with the support of the Commissariat for Refugees and Migration, are registered in the birth registry, and are issued with a Birth Certificate in Serbian and English.

Following the official termination of the 2022 tripartite Memorandum of Understanding, the Ministry of Public Administration and Local Self-Government continues, as part of its regular activities, to monitor the situation in the area of exercising the right to birth registration, with the aim of preventing the occurrence of cases of persons not registered in the birth registration, i.e., preventive action and assessing the need for further activities in this area.

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

In the Republic of Serbia, several measures are being taken within the social protection system to recognize and adequately respond to gender-based vulnerabilities in cases of human trafficking, with a special focus on the protection of women and girls, who constitute the majority of victims. In cooperation with the Centre for the Protection of Victims of Human Trafficking, professional workers employed in social protection are trained to recognize indicators of human trafficking, including

gender-specific risks. Special attention is paid to the distinction between gender-based violence and exploitation, as well as to ways of supporting victims.

All social protection institutions, especially social work centres, and children's shelters, cooperate with the police, prosecutors, the Centre for the Protection of Victims of Human Trafficking, educational institutions, health care institutions, and civil society organisations, especially in the areas of recognition and timely response. The role of experts in the social protection system is the preliminary identification of potential victims of human trafficking, especially women and girls, who are considered the most vulnerable category when it comes to human trafficking, precisely because of gender inequality and the numerous forms of discrimination to which they are exposed. The gender dimension of human trafficking implies that the position of women in society, poverty, domestic violence, lack of access to education, and economic dependence are some of the key factors contributing to their vulnerability.

In 2022, a Shelter for Victims of Human Trafficking was established at the Centre for the Protection of Victims of Human Trafficking, which was granted an operating license by the Ministry of Labour, Employment, Veteran and Social Affairs with a validity period until 2028. The shelter is intended for girls and women aged 16 and over and can also accommodate mothers with children. It is a facility with high security measures and is intended primarily for victims at high security risk. The capacity of the Shelter is 6 victims of human trafficking with the possibility of additionally accepting their children. This shelter is managed by the Republic of Serbia, in accordance with the Law on Social Protection.<sup>27</sup>

The Ministry of Labour, Employment, Veteran and Social Affairs significantly increased the budget of the Centre for the Protection of Victims of Human Trafficking in 2024, which facilitated the functioning of the Centre and the Shelter for Victims of Human Trafficking. The adaptation of the Shelter premises is under way, so that the female beneficiaries would have the best possible conditions while using the accommodation service.

The Ministry of Labour, Employment, Veteran and Social Affairs has provided technical equipment and furniture for the screening room. This investment is particularly significant, because in the future, the female beneficiaries of the Shelter will be able to give their testimony in conditions where they feel safe and secure, with adequate psychological support from professional workers with whom they have a developed relationship of trust.

The cooperation of the Centre for the Protection of Victims of Human Trafficking with the police is at a high level. The shelter has security cameras and panic buttons that are connected to the police, whose offices are located in the same building as the shelter. In addition, security doors have been installed. During their stay at the shelter, users participate in workshops on safety and are introduced to the safety procedures at the shelter and learn how to maintain their safety during and after leaving the facility.

In addition to the specialised Shelter for Victims of Human Trafficking, at the Centre for the Protection of Victims of Human Trafficking, there are also shelters for victims of domestic violence in the Republic of Serbia, which can respond in case of urgent interventions and when it comes to victims of human trafficking (women and girls). The services of all shelters are free of charge and available to all women victims of violence without discrimination.

Currently, there are 7 licensed providers of shelter services for victims of violence operating in the Republic of Serbia, with a total capacity of 110 beneficiaries. The Centre for Social Work Pančevo, the Centre for the Development of Local Social Protection Services, and the Safe House for Women

---

<sup>27</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_socijalnoj\\_zastiti.html](https://www.paragraf.rs/propisi/zakon_o_socijalnoj_zastiti.html)

and Children Victims of Domestic Violence are in the process of renewing their licenses because they have expired.

Domestic violence outreach programmes are specialised interventions aimed at ensuring the safety of victims of violence (most often women and children) by changing the violent behaviour patterns of perpetrators. The Republic of Serbia began establishing these programmes in 2011, but systemic solutions need to be adopted to ensure the sustainability of programmes for perpetrators of violence. During 2024, at the initiative of the National Network for Programmes for Work with Perpetrators of Violence – OPNA, a Working Group for the Development of a Roadmap was formed, which should define key steps towards overcoming critical barriers to establishing programmes for work with perpetrators of violence in Serbia, which are effective and based on the safety of the victim, and in accordance with international good practices and the provisions of the Istanbul Convention. Three meetings of the Working Group, which developed the roadmap proposal during this reporting period, were held. The Working Group consisted of representatives of the Ministry of Labour, Employment, Veteran and Social Affairs, the Ministry of Justice, the Ministry of Family Care and Demography, the National Network for Programmes of Work with Perpetrators of Violence, as well as organisations that provide support to victims of violence.

The National SOS Line for Support for Women Experiencing Violence has been established by the Republic of Serbia, under the auspices of the Ministry of Labour, Employment, Veteran and Social Affairs and financed from the republican budget. The national SOS line, which has been operating since 2018, provides service 24 hours a day, 7 days a week. The service is provided by 8 licensed professionals, 1 professional supervision coordinator and 1 supervisor. The service is established for the entire territory of the Republic of Serbia at the number 0800 222 003. Calls to this line operate on the principles of confidentiality and anonymity in accordance with the Istanbul Convention.

When it comes to counselling centres, a small number of municipalities in Serbia have the ability to finance the provision of these services to an appropriate extent and in accordance with the needs of the population, and according to the Law on Social Protection, this group of services is financed from local government resources.

Given that these services are not yet subject to the licensing process (service standards have not been adopted), there is currently no possibility of support through earmarked transfers for less developed municipalities. The Ministry, in cooperation with civil society organisations, has developed a draft standard for this type of service, but it has not yet been implemented in the Rulebook on the Detailed Conditions and Standards for the Provision of Social Protection Services. However, in larger cities, there are also specialised institutions for mediation in family relations – Marriage and Family Counselling Centres, Development Counselling Centres, etc. The services provided there are free of charge for citizens.

In terms of funding, according to the Law on Social Protection, except for shelters for victims of human trafficking, which are managed by the Republic, the financing of shelter services is primarily the responsibility of municipalities/cities, while the state supports the establishment and development of these services through earmarked transfers in those local governments that are below the republican level of development. In addition to shelter accommodation, some local governments, in their decisions on rights and services in social protection, provide for the provision of other various services to victims of domestic violence, such as extended housing for women and children who are victims of domestic violence and victims of human trafficking, social housing, the right to material support in the form of full or partial exemption from paying housing and communal services, etc. The Ministry has recognised the need to go beyond the existing norm when it comes to shelters for women victims of

violence (so-called safe houses), especially after the GREVIO evaluation visit to Serbia, when it was concluded that there are no specific standards for ensuring an integrated victim-centred approach to shelter accommodation aimed at preventing secondary victimisation and empowering women. Therefore, in cooperation with the non-governmental sector, a proposal for functional standards for the provision of shelter accommodation services for women with experience of gender-based violence was developed, however, these standards have not yet been implemented in the Rulebook on the closer conditions and standards for the provision of social protection services. In addition, it is necessary to develop a proposal for specific structural quality standards for the provision of shelter accommodation services for women with experience of violence in order to fully comply with the Istanbul Convention in this area.

Considering all of the above, an analysis entitled “Specialised Safe House Service in Serbia – Needs, Capacities and Resources for Stable, Long-Term and Unhindered Functioning” was conducted in cooperation with UN WOMEN in Serbia. The aim of this analysis was to determine the needs, capacities and resources for stable, long-term and unhindered functioning of this service. The analysis showed that it is necessary to increase the number of safe houses and capacities according to Council of Europe standards, that it is necessary to adopt functional and structural standards of work specific to safe houses, that it is necessary to define the content and scope of the service, which include ensuring security, accommodation, conditions of admission, stay and leaving the safe house, psychosocial support and counselling, and specific support programmes for vulnerable groups of women such as women with disabilities, etc.

Based on the results obtained from this analysis, as well as previously conducted civil sector research on the functioning and problems of safe houses, the Ministry of Labour, Employment, Veteran and Social Affairs, together with the working group, took all of this into account when creating the draft Action Plan for the Implementation of the Strategy for Preventing and Combating Gender-Based Violence against Women and Domestic Violence for 2025, which passed the public debate phase in February 2025.

The Ministry of Human and Minority Rights and Social Dialogue, within its competence relating to reporting on the implementation of international treaties in the field of human rights, regularly publishes on its website the Concluding Observations of the UN treaty bodies (<https://minljmpdd.gov.rs/sektori/ljudska-prava/medjunarodnji-ugovi/>) and the UN Human Rights Council (<https://minljmpdd.gov.rs/sektori/ljudska-prava/medjunarodni-ugovori/>) and directly delivers them to all competent institutions at the republican, provincial and local levels with instructions to ensure the implementation of the recommendations, and is working with civil society to develop common criteria for the fulfilment of the recommendations and is conducting a dialogue on the so-called shadow reports, through which civil society organisations report on individual areas regarding the state of human rights. These recommendations include those that directly relate to human trafficking.

In order to recognize the specific vulnerabilities of women and girls as potential victims of human trafficking, a measure has been defined within the Gender Equality Strategy for the period from 2021 to 2030<sup>28</sup> regarding Improving the safety of women and girls in the public and private spheres through the elimination of all forms of violence, including human trafficking, sexual and other forms of exploitation, especially in times of crisis and emergency situations.

Also, the Ministry of Human and Minority Rights and Social Dialogue implemented a campaign called “Stop Femicide” in 2023 and 2024, which was supported by the German International Cooperation

---

<sup>28</sup> [http://demo.paragraf.rs/demo/combined/Old/t/t2021\\_11/SG\\_103\\_2021\\_001.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2021_11/SG_103_2021_001.htm)



Agency – GIZ. During the aforementioned campaign, a short video was produced and broadcast in the media and on social networks, and panels were held in five cities (Belgrade, Novi Sad, Niš, Kragujevac and Novi Pazar).

Employees of the Commissariat for Refugees and Migration who work in asylum centres and reception centres hosting migrants and asylum seekers are required to regularly attend training in identifying gender-related vulnerabilities. Specialised civil society organisations on human trafficking have unhindered access to centres managed by the Commissariat for Refugees and Migration, where they conduct workshops to inform beneficiaries and identify risks and potential victims.

In order to ensure standardised procedures, a mandatory instruction from the Commissioner for Procedures in Asylum Centres requires that, upon admission to asylum centres, a preliminary vulnerability identification is carried out using the EU Asylum Agency (EUAA) application for identifying vulnerable categories, and the results are an integral part of the personal file of each asylum seeker.

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

**a. research;**

The Ministry of Labour, Employment, Veteran and Social Affairs, in cooperation with the civil society organisation “Bureau for Combating Human Trafficking” (AHTB IBSSA SERBIA), in accordance with the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024 – 2029 and the Action Plan for the Implementation of the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2026, conducted a survey on human trafficking among high school students (third and fourth year high school students) in the Republic of Serbia in 2024. The survey had very significant results, as it included the analysis of a representative sample of 2,022 high school-age respondents from across the Republic of Serbia. As part of the research, in this phase, when selecting schools, they selected students from high schools, medical schools and some law and administrative schools, assuming that these are the students who are most informed about the problem of human trafficking. One of the general conclusions obtained during the research is that all schools in the Republic of Serbia must work more proactively to improve students’ awareness of the problem of human trafficking and its prevention in the coming period. The Bureau for Combating Human Trafficking will present the results of the research to the public in the coming period, and is also planning a joint activity to implement activities on education and prevention of human trafficking in schools with representatives of the Ministry of Education and school administrations.

**b. information, awareness-raising and education campaigns;**

During 2025, the Ministry of the Interior published an informative post on the official website of the ministry,<sup>29</sup> as well as on social networks,<sup>30</sup> with the aim of informing and raising public awareness about the problem of human trafficking and the possibilities of reporting suspicions of human

<sup>29</sup> <https://www.mup.gov.rs/wps/portal/sr/baner-sadrzaj/trgovina+ljudima>

<sup>30</sup> <https://www.instagram.com/p/DGsO7umsFYf/?igsh=NXV4Z3h3Njd0d3o2>

trafficking. On the occasion of Youth Day on 12 August 2025, a post was published on smart choices and responses to the challenges of security risks.<sup>31</sup>

The National Coalition to End Child Marriage in Serbia,<sup>32</sup> led by the Coordination Body for Gender Equality of the Government of the Republic of Serbia and UNICEF, a media campaign was implemented to raise awareness about the harmfulness of traditional practices of child and underage marriages. Within the framework of the National Coalition, several information campaigns have been implemented with the aim of raising awareness about this problem: “Child Marriage is Not a Roma Tradition”,<sup>33</sup> “Childhood, Not Marriage”, stories of Roma women<sup>34</sup> and Pretty Loud – Mashup 2020 by GRUBB.<sup>35</sup>

The National Contact Centre for Child Safety on the Internet, under the Ministry of Information and Telecommunications, implements education for children and parents, focusing on the risks of communicating with strangers on the Internet, the recruitment of children through the misuse of digital technologies, the misuse of children’s photos, as well as cases of online sexual abuse of children. Lectures are held in primary and secondary schools, and during summer and winter holidays in sports camps for children.

In the period from 1 January 2022 to 31 July 2025, the National Contact Centre for Child Online Safety implemented a total of 369 presentations on the topic of child online safety.

During the reporting period, the presentations were attended by 19,775 children, 4,020 parents, 748 teachers, 162 trainers and 138 librarians who were informed that any form of digital violence, including child recruitment and abuse of children for the creation of pornographic content, can be reported to the National Contact Centre for Child Safety via the toll-free hotline 19833, the form on the website [www.pametnoibezbedno.gov.rs](http://www.pametnoibezbedno.gov.rs), email address and social networks, as well as on the national platform for the prevention of violence involving children “I Protect You”. The triage team of the “I Protect You” platform is under the Ministry of Information and Telecommunications.

The goal of the National Contact Centre’s lectures is to prevent violence against children through the misuse of digital technologies, by sensitising children to be cautious when communicating with strangers online, and by making them and their parents aware of the dangers and critically approaching content available on the internet – advertisements for camps, scholarships, jobs and collaborations.

Experts from the National Contact Centre for Child Online Safety continuously cooperate with the civil society organisation ASTRA through the exchange of experiences and educational materials. In cooperation with the civil society organisation ASTRA, trainings for peer educators on the topic of child online safety were held in January 2024.

The Serbian Red Cross conducts annual campaigns to raise public awareness about the problem of human trafficking, marking July 30 – UN World Day against Trafficking in Human Beings, October 18 – European Day against Trafficking in Human Beings, activities are aimed at reducing the vulnerability of potential and actual victims of human trafficking in Serbia. Emphasis is placed on children and young people, including particularly vulnerable groups, through awareness-raising activities and their ability to resist the traps of human trafficking.

<sup>31</sup> [https://www.instagram.com/p/DNP8zPBs6bk/?img\\_index=2&igsh=MTl4cWFrOXE5bTlqcg](https://www.instagram.com/p/DNP8zPBs6bk/?img_index=2&igsh=MTl4cWFrOXE5bTlqcg)

<sup>32</sup> <https://www.srbija.gov.rs/vest/366905/osnovana-nacionalna-koalicija-za-okoncanje-decijih-brakova.php>

<sup>33</sup> <https://www.youtube.com/watch?v=e-ESNaxWPpg>

<sup>34</sup> <https://www.youtube.com/watch?v=aVITfvMzWiI>

<sup>35</sup> [https://www.youtube.com/watch?v=r-ezaPqeWwQ&list=RDr-ezaPqeWwQ&start\\_radio=1](https://www.youtube.com/watch?v=r-ezaPqeWwQ&list=RDr-ezaPqeWwQ&start_radio=1)

The Serbian Red Cross has a widespread network of peer educators who regularly conduct informative lectures and interactive workshops with various target groups throughout the year. During 2022, 1,524 workshops were conducted, and 36,634 people were trained. During 2023, 1,788 workshops were conducted, and 36,792 people were trained. During 2024, 1,598 workshops were conducted, and 38,028 people were trained. In the first half (6 months) of 2025, 591 workshops were conducted, and 12,768 people were trained.

The National Employment Service, as an institution operating within the system of active employment policy, in cooperation with the Ministry of Labour, Employment, Veteran and Social Affairs, the Prosecutor's Office, the Centre for Social Work, as well as civil society organisations, participates in national and international initiatives to combat human trafficking, with the aim of informing citizens about the risks and methods of protection.

During 2025, the Ministry of Labour, Employment, Veteran and Social Affairs, in partnership with the Centre for the Protection of Victims of Human Trafficking and the Ministry of the Interior, implemented a series of multi-sectoral trainings for professionals at the level of local self-government units (police, prosecutor's office, judiciary, education, healthcare, social protection, municipal police, civil registry services, labour inspection, civil sector, etc.) in order to raise awareness among employees about indicators for recognising cases of human trafficking. The aforementioned trainings were covered by the local media in order to raise awareness among the general public in local self-government units.

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

In order to raise public awareness about the dangers and measures for victims of human trafficking, the Commissariat for Refugees and Migrations continued to provide support to local self-government units (hereinafter referred to as: LSGUs) in the development of Local Action Plans (hereinafter referred to as: LAPs), through which the local self-government determines the situation, problems and needs of various categories of migrants located on its territory, in order to improve their position. When revising existing and developing new LAPs, local self-government units included victims of human trafficking as a special category for which a needs assessment should be conducted and measures developed. Local self-government units have included specific objectives related to victims of human trafficking in their local plans in the field of migration, and another 10 local self-government units have recognised victims as one of the vulnerable categories in these plans, but no specific objectives and measures have been defined for them. In accordance with the Action Plan for the Implementation of the Programme for Combating Trafficking in Human Beings in the Republic of Serbia for the period 2024-2026, the Commissariat for Refugees and Migration has launched a public call for funding to support activities in the field of prevention, referral and protection of victims of human trafficking in the LAP for migration. After the competition, funds worth a total of RSD 1,000,000 was awarded to the final beneficiaries of the LLS, the Local Teams for Combating Trafficking in Human Beings in Kikinda, Kragujevac, Vranje and Šid.

#### **d. education, vocational training and job placement programmes.**

The Ministry of Education is implementing, with various partners (listed in the answer to question number 2. under b) and d), one of the important programmes implemented in the education system and contributing to the strengthening of a supportive and safe school environment is the programme "Promoting Democratic Culture in the Formal Education System and Implementing the Council of Europe's Reference Framework for Competences for Democratic Culture – CEDC", which ensures a safe and engaging school environment, while simultaneously strengthening the competencies of education employees to eliminate violent, discriminatory and anti-democratic structures in the school

and school environment, improving the ethos in the school and providing support to students. These school activities significantly contribute to promoting a multicultural, multilingual and intercultural perspective in education. With the aim of supporting changes in education policies at the system level, a package of materials in this area has been created,<sup>36</sup> such as the Guide for Promoting Democratic Culture in Schools, the Handbook with Examples of Good Practice in the Application of Competences, and Developing Competences for Democratic Culture in the Digital Age. A total of 20 external advisors has been engaged in the education system for the implementation of the ROKDK in schools in the 2022-24 period, in order to improve their knowledge and skills for the implementation of the ROKDK in schools. In cooperation with the Council of Europe and the Ministry of Education, 36 mentor schools were selected to foster democratic culture in schools within the EU/CoE project “Quality Education for All”. Visits and trainings were held for about 150 new schools on the territory of the Republic of Serbia in all school administrations. The mentor schools used guides for mentors and guidelines for new schools for the development of competences for democratic culture. This activity, which started in the 2023/24 school year, will continue until the end of 2026, when it is expected that over 800 schools will be included in the programme for developing competences for democratic culture, in accordance with the pan-European Framework of the Council of Europe.

One of the measures to support students from vulnerable social groups is external advisors who contribute to improving the accessibility and quality of education. A total of 41 were engaged for inclusive education, 20 for the implementation of the Framework for Democratic Culture, and 66 for the area of protection from violence. All colleagues participated in the training on the implementation of inclusive education.

The Action Plan for the period from 2024 to 2026 for the implementation of the Employment Strategy of the Republic of Serbia for the period from 2021 to 2026 defines, within certain measures of active employment policy, the categories of persons with reduced employability who are included in the measures, and in measures where categories are not defined, priority for inclusion and intensive individual support is also provided to unemployed persons who are victims of human trafficking. The National Employment Service is oriented towards providing services to unemployed persons through information and advisory work (individual and group), employment mediation, as well as the inclusion of unemployed persons in active employment policy measures, in accordance with the identified needs of the person. The active employment policy measures in which a person will be included primarily depend on his or her needs for assistance as well as the needs of the labour market on the other hand, and are determined by the individual employment plan. All activities and measures implemented by the National Employment Service are aimed at providing intensive support for faster entry into the labour market and employment.

In 2022, 6 persons with a recorded status of victims of human trafficking were registered with the National Employment Service. Considering the length of their unemployment status, two persons had been looking for a job for up to 3 months, one person had been looking for a job for 3-6 months, one person had been looking for a job for 9-12 months, one person for 1 to 2 years and one person for 3-5 years. During 2022, three persons were included in the services and measures of the active employment policy, namely: job fairs and psychological assessment of job candidates. 13 individual employment plans were agreed with the above category of persons, with basic guidelines for active job search, determination of activities aimed at finding employment, occupations in which persons will be mediated, as well as the active employment policy measures in which persons will be included. During

---

<sup>36</sup> <https://prosveta.gov.rs/kategorija/publikacije/>

the reporting period, there were eleven cases<sup>37</sup> of employment of unemployed persons with registered status as victims of human trafficking.

A total of five people (4 women) were registered with the National Employment Service during 2023. Observed by the length of unemployment status, one person had been looking for a job for 3-6 months, three people for 1 to 2 years and one person for 3-5 years. During 2023, six people were included in the services and measures of active employment policy, namely: employment fairs, motivational and activation training for unqualified and low-qualified persons, information and advisory services in the Business Centre and psychological assessment of employment candidates. During the reporting period, 11 individual employment plans were agreed with the above-mentioned category of persons, along with basic guidelines for active job search, determination of activities aimed at finding employment, occupations in which persons will be mediated, as well as active employment policy measures in which persons will be included. During the reporting period, there were seven cases<sup>38</sup> of employment of unemployed persons with registered status as victims of human trafficking.

A total of five people (2 women) were registered with the National Employment Service during 2024. One person is in the age group 40-44, and one person is in the age group 50-54. Considering the length of unemployment status, one person had been looking for a job for 3-6 months, and one person for 5-8 years. During 2024, three people were included in the active employment policy measures, namely in the following measures: educational services in the Business Centre, self-employment subsidy and information and advisory services in the Business Centre. During the reporting period, six individual employment plans were agreed with the above-mentioned category of persons, along with basic guidelines for active job search, determination of activities aimed at finding employment, occupations in which persons will be mediated, as well as active employment policy measures in which persons will be included. During the reporting period, there were ten<sup>39</sup> cases of employment of unemployed persons with registered status as victims of human trafficking.

In 2025, two persons (two women) with a registered status of victims of human trafficking were registered with the National Employment Service. Considering the length of unemployment status, one person had been looking for a job for 9-12 months, and one person for 5-8 years. During the reporting period, one person was included in the active employment policy measures, namely in the measure: training for active job search. Two individual employment plans were agreed with the mentioned category of persons, with basic guidelines for active job search, determining activities for the purpose of finding employment, occupations in which persons will be mediated, as well as the active employment policy measures in which persons will be included. During the reporting period, there were five<sup>40</sup> cases of employment of unemployed persons with registered status as victims of human trafficking.

On an annual basis, in order to implement active employment policy measures, the National Employment Service announces public calls that are available on the website<sup>41</sup>

In order to implement active employment policy measures, the National Employment Service announced the following public calls and competitions in 2025:

- 1) For the purpose of education and training, calls for the following measures have been published:

---

<sup>37</sup> One person was engaged for work several times during the calendar year

<sup>38</sup> One person was engaged for work several times during the calendar year

<sup>39</sup> One person was engaged for work several times during the calendar year

<sup>40</sup> One person was engaged for work several times during the calendar year

<sup>41</sup> <https://www.nsz.gov.rs/sadrzaji/nzs-konkursi/10>

1. Professional practice
  2. Interns with secondary education
  3. Interns with higher education
  4. Acquisition of practical knowledge
  5. Training at the employer's request
  6. Training for the employer's needs for the employee
- 2) For the purpose of subsidised employment:
    1. Subsidy for employment of unemployed persons from the category of difficult to employ
    2. Subsidy for self-employment
    3. Subsidy for self-employment for members of the Roma nationality
  - 3) In order to support persons with disabilities:
    1. Wage subsidy for people with disabilities without work experience
    2. Refund of support costs for persons with disabilities who are employed under special conditions
    3. Work activation of people with disabilities

In January 2025, a Public Call was published for the allocation of subsidies for self-employment of unemployed persons in 2025, who are included in the Youth Guarantee Programme, within the framework of the IPA 2020 direct grant.

In 2021, the Republic of Serbia adopted the Employment Strategy in the Republic of Serbia for the period from 2021 to 2026, which is operationalised through two three-year action plans.<sup>42</sup>

The action plans (for the period from 2021 to 2023 and for the period from 2024 to 2026) determine specific activities that need to be implemented within the framework of reference measures, i.e., specific objectives, contain descriptions of active employment policy measures that will be implemented in the relevant period (including measures from the system of additional education and training), categories of people with reduced employability (who have priority when included in measures, including measures from the system of additional education and training), the carriers of activities and the financial framework. Special attention is paid to improving the labour market position of unemployed women, young people, people with disabilities, beneficiaries of cash social assistance and members of the Roma national minority, given the difficulties they face in the process of integration or reintegration into the labour market, factors of multiple employability difficulties, as well as the significant representation of these categories in the total registered unemployment. Victims of human trafficking also have the status of persons with difficulty in employment, and thus priority when including them in active employment policy measures, as beneficiaries of social protection services. Accordingly, unemployed persons with the status of victims of human trafficking have the opportunity to participate in non-financial measures – measures of active job search and financial measures – measures of additional education and training, support for employment and self-employment, and measures of support for employment of persons with disabilities.

## **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;**

<sup>42</sup> The stated documents are available in English on the website of the Ministry of Labour, Employment, Veteran and Social Affairs: <https://www.minrzs.gov.rs/sites/default/files/2025-01/Employment%20Strategy%20of%20the%20RS%20%20%202021-2026.pdf> and <https://www.minrzs.gov.rs/sites/default/files/2025-01/Action%20plan%20for%20implementation%20of%20ES%20for%202021.%20do%202023%20.pdf> and <https://www.minrzs.gov.rs/sites/default/files/2024-07/Action%20Plan%202024%E2%80%932026%20for%20the%20Implementation%20of%20the%20Employment%20Strategy%20....pdf> .

According to the Law on Social Protection<sup>43</sup> and the Rulebook on Detailed Conditions and Standards for the Provision of Social Protection Services,<sup>44</sup> the following services are within the competence of local self-government units:

- 1) Community-based day services (daycare, home help, personal child care and shelter);
- 2) Support services for independent living (personal assistance and supported housing, with the supported housing service being the responsibility of those local self-governments whose level of development is above the national average)
- 3) Counselling-therapeutic and social-educational services
- 4) Accommodation services (shelter accommodation and respite accommodation).

Accessible, sustainable and high-quality social care services in the community are a key condition for the adequate implementation of the deinstitutionalisation process. These social care services should provide continuous and high-quality care and support to vulnerable persons, thereby ensuring a sustainable quality of life in the community and encouraging their inclusion in social activities. At the same time, these social care services provide support to families, enabling informal caregivers to optimally combine the performance of professional duties and the care of their loved ones.

At the proposal of the Ministry of Labour, Employment, Veteran and Social Affairs, the Government of the Republic of Serbia adopted the Strategy for Deinstitutionalisation and Development of Community-Based Social Protection Services for the period from 2022 to 2026, and as such it represents a harmonised system of measures, conditions and public policy instruments that the Republic of Serbia should implement in order to prevent institutionalisation, i.e., reduce the number of citizens using residential care services. The Strategy should enable the development of community-based social protection services, which will contribute to ensuring that beneficiaries of the social protection system who need more intensive support meet most of their needs in the natural environment.

The insufficient number of social protection services is one of the biggest challenges in the social protection system. Given that the Law on Social Protection clearly defines the responsibilities for services in the social protection system and that a larger number relate to the competence of local self-government units, there are different degrees of development in the Republic of Serbia. The Ministry of Labour, Employment, Veteran and Social Affairs began work in 2024 on the preparation of new standards, especially in the area of counselling and therapy and socio-educational services, which will contribute to both individual support and support for the family and the social protection system. The Rulebook on the Detailed Conditions and Standards for the Provision of Social Protection Services defines structural and functional standards for community services, except for counselling and therapy and socio-educational services. This is a heterogeneous group of services that differ in intensity and content, making it very difficult to cover them with a single rulebook.

The Ministry of Labour, Employment, Veteran and Social Affairs, in cooperation with UNICEF, developed a draft standard for intensive family support services in 2024 – a family worker in the group of counselling-therapeutic and socio-educational services intended for families living in multiple deprivations (e.g., poverty combined with mental health problems, addictions, disability, domestic violence, discrimination and social exclusion) where the complexity of the situation is such that it requires a professional response, a holistic approach and work with the entire family. This is one of the services in the group of counselling-therapeutic and socio-educational services that will be of great

---

<sup>43</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_socijalnoj\\_zastiti.html](https://www.paragraf.rs/propisi/zakon_o_socijalnoj_zastiti.html)

<sup>44</sup> <https://www.paragraf.rs/propisi/pravilnik-blizim-uslovima-standardima-pruzanje-usluga-socijalne-zastite.html>

importance in the prevention and support of families, which may be exposed to various external risks, including children, girls, women and men who are potential victims of human trafficking.

The family support service will be established in centres for children, youth and families. These centres will be piloted in existing institutions for children without parental care and will represent a step forward towards deinstitutionalisation. A Transformation Roadmap has also been published, published on the ministry's website.<sup>45</sup>

At the end of 2024, the Concept of Centres for Children, Youth and Families was completed in cooperation with UNICEF, which was also published on the ministry's website.<sup>46</sup>

The Field Assistant service was piloted in the previous period. During 2022, proposals for standards for this service were developed, in which the Ministry of Labour, Employment, Veteran and Social Affairs also participated. The goal of the Field Assistant service is to timely protect the user from being involved in situations and circumstances that may have an unfavourable or harmful impact on him, to provide adequate assistance and support to the user who finds himself in such a situation and circumstances, and to improve the user's capacities and skills for independent problem-solving and elimination of the aforementioned risks. A Field Assistant is a professional who works directly in the field, in the community, and has a key role in the prevention of human trafficking. His main role is to recognize risky situations, provide timely support and refer potential victims to appropriate services. They represent a link between the community and institutions, thereby ensuring a timely and adequate response from the system.

At the beginning of March 2024, the National Coordinator for Serbia on behalf of the Austrian Development Agency (ADC), in coordination with the Ministry of Justice, addressed the Social Protection Sector with information about the implementation of the project "Support to Strengthening the Rule of Law in the Republic of Serbia" (EU Anti-Corruption and Fundamental Rights), funded by the EU, the German Federal Ministry for Economic Cooperation and Development (BMZ) and the Austrian Development Cooperation (ADC), which partly deals with supporting the implementation of the Action Plan for the National Strategy for the Rights of Victims and Witnesses for the period 2023-2025.

During this reporting period, two meetings were held with the national coordinator and experts in the field of support for victims and witnesses of criminal offences from the Austrian Centre for Legal Competence in Vienna, in order to familiarize themselves with the legal and by-laws in the field of social protection in the Republic of Serbia. Their task as experts is to, based on their expertise in this field and our legal and by-laws, prepare a draft standard that will be submitted to the Ministry of Labour, Employment, Veteran and Social Affairs, i.e., the Social Protection Sector, in order to be implemented in the Regulation on Amendments and Supplements to the Regulation on Closer Conditions and Standards for the Provision of Social Protection Services.

The experts involved are expected to submit proposals for standards for the provision of social protection services, which relate to the provision of support and assistance to victims and witnesses of criminal offences, in 2025. Given that this is a heterogeneous group of services that differ in intensity and content, the adoption of the Regulation on Amendments and Supplements to the Regulation on Closer Conditions and Standards for the Provision of Social Protection Services will depend on the

---

<sup>45</sup> <https://www.minrzs.gov.rs/sr/dokumenti/ostalo/sektor-za-socijalnu-zastitu/mapa-puta-akcioni-plan-transformacije-centra-za-decu-mkade-i-porodicu>

<sup>46</sup> <https://www.minrzs.gov.rs/sr/dokumenti/ostalo/sektor-za-socijalnu-zastitu/koncept-centara-za-decu-mlade-i-porodicu>



creation of formal conditions for their adoption in the group of social protection services regulated by the Law on Social Protection.

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

Persons with disabilities are beneficiaries of social protection services if they have physical, intellectual, sensory or mental difficulties or difficulties in communication and when, due to social and other obstacles, they encounter functional limitations in one or more areas of life.

Monitoring of institutions that accommodate people with disabilities is carried out through the Social Protection Inspectorate of the competent ministry. Professional support for employees in social protection institutions is provided by the Republic and Provincial Social Protection Institutes. There are also external evaluations by various representatives of EU organisations and committees.

Since 2022, the Law on the Rights of Beneficiaries of Temporary Accommodation Services in Social Protection has been in force,<sup>47</sup> which is part of the strategic solution for how to implement the transition from institutional care to living in the community. According to this law, accommodation is provided only as a last resort if it is not possible to provide family care and daily services in the community. Accommodation is temporary and limited in time to six months for minors and 12 months for adults, after which it can be extended with a detailed explanation of the justification for extending the accommodation and an assessment of the conditions for providing protection in a family environment or outside an institution in accordance with the principles of deinstitutionalisation.

The adoption of the Law on the Rights of Beneficiaries of Temporary Accommodation Services in Social Protection ensured adequate and timely comprehensive protection and safety of beneficiaries, with clearly defined rights and obligations of beneficiaries, as well as the rights, obligations and responsibilities of the service provider, in accordance with the will and wishes of the user, i.e., the best interest of the minor user, while respecting their physical and psychological integrity, safety, in accordance with guaranteed human rights and freedoms.

According to the Law on the Rights of Temporary Accommodation Beneficiaries in Social Protection, the accommodation beneficiary has the right to participate in the assessment of his/her condition and needs and in deciding whether to accept certain activities envisaged in the individual service provision plan, as well as to receive all the information he/she needs in a timely manner, including the description, purpose and benefit of the proposed activities, as well as information about available alternative activities and other information of importance for the provision of the service in an understandable manner and in an accessible form, regardless of the level of business capacity.

The beneficiary has the right, with the use of necessary support mechanisms (adaptation of information, use of alternative forms of communication, consultation with a trusted person, family members to help interpret the beneficiary's will and wishes, establishment of a decision-making team), to actively participate in the planning and implementation of activities and measures when providing accommodation services, regardless of the level of business capacity.

Also, the beneficiary has the right to contact family members and other persons without restrictions, in accordance with the law and the rules of conduct and organisation of life at the service provider, to receive visits on the premises of the institution or service provider and to visit outside the premises of the institution or service provider, unless the court has ordered a protective measure that temporarily prohibits or limits contact with family members and other persons.

---

<sup>47</sup> <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2021/126/1>

The adoption of the Law on the Rights of Beneficiaries of Temporary Accommodation Services in Social Protection contributes to the improvement of the position of beneficiaries of temporary accommodation services without discrimination, under equal conditions and with the active and informed participation of all persons involved in making decisions that affect the lives and rights of beneficiaries, in accordance with a human rights-based approach. The Law deals in a separate part with the regulation of protection from abuse, exploitation and neglect. It also emphasises the right of beneficiaries to protection from any form of torture and other cruel, inhuman or degrading treatment or punishment. The Law was adopted in cooperation with the UN Mission in Serbia and with the consent of the European Commission.

Accommodation services for children are largely provided in a family environment. Foster care, or family accommodation for children, is fairly well developed in Serbia, but there is not a sufficient number of specialised foster families that could respond to the complexity of the needs of children and young victims of human trafficking. The Centre for the Protection of Victims of Human Trafficking is strongly committed to the development of specialised foster care for children and young victims of human trafficking, as this is in their best interest. This initiative is also recognised in the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2029,<sup>48</sup> specific objective 2 “Improved quality of protection of presumed victims and victims of human trafficking, especially women and children”, measure 2.2 “Improved protection and assistance to victims of human trafficking”. Also, the Action Plan for the Implementation of the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2026<sup>49</sup> provides for the development of a housing service for men. The Centre for the Protection of Victims of Human Trafficking has been allocated an apartment for the purposes of developing a housing service for men. Preparations for the establishment of the service are underway.

As part of the UNICEF Work Plan for 2023-2024, which is being implemented in cooperation with the Ministry of Labour, Employment, Veteran and Social Affairs and the Ministry of Family Care and Demography, activities were implemented to support the further development of foster care in Serbia and the recruitment of new foster families. Training was organised to implement local campaigns for the recruitment of new foster families for employees in 13 priority centres for family placement and adoption and social work centres. After the training, additional mentoring support was provided, after which the campaigns were implemented in 13 municipalities/cities. As a result of these activities, 82 new foster families were recruited.

The experience gained during this process, as well as examples of good practice, are summarised in a practical Guide for the Development and Implementation of Campaigns for the Recruitment of New Foster Families, which serves as a resource for other foster care and adoption centres and social work centres in the process of recruiting new foster families. The Guide is in the finalisation phase and will be published in early 2025.

Due to amendments to the Foster Care Regulations (2022), UNICEF organised the development and accreditation of a training programme for professionals and candidates for standard foster care “Child-Friendly Family”. The accompanying Candidate Training Manual “Child-Friendly Family – Alternative Care for Children Not Living in a Parental Family” was also developed as a resource for implementing basic training for foster care candidates.

---

<sup>48</sup> [http://demo.paragraf.rs/demo/combined/Old/t/t2024\\_03/SG\\_025\\_2024\\_001.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2024_03/SG_025_2024_001.htm)

<sup>49</sup> [http://demo.paragraf.rs/demo/combined/Old/t/t2024\\_03/SG\\_025\\_2024\\_001.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2024_03/SG_025_2024_001.htm)

Five additional trainings for professionals were organised – two for standard foster care based on the new training programme, one for temporary foster care, one for emergency foster care and one for preparation and support for foster families for the adoption of a child with Down syndrome. The trainings covered a total of 114 representatives from foster care and adoption centres and social work centres. The result of cooperation with UNICEF is the recruitment of 82 foster families and the placement of 223 children and youth (117 boys and 106 girls) in foster families. The largest number of children and youth, 196 of whom were placed in standard foster families. 10 children and youth were placed in kinship families. Specialised foster care was provided for 9 children and youth and occasional foster care for 10 of them.

During 2025, new foster families will undergo the “Child-Friendly Family” training programme, while existing ones will be empowered for other forms of foster care. Examples of good practice will also be collected and documented, which will be a significant resource for professionals from other local communities.

In April 2025, a Guide for the Creation, Implementation and Evaluation of Foster Care Campaigns in the Local Community was developed, which was created as a support for professionals working in foster care and a response to the unfavourable trend of decreasing the number of families interested in engaging in this type of child protection.

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

A child without parental care (minor ward) and an adult who is deprived of legal capacity (adult ward) are placed under guardianship.

The entire professional and formal legal procedure for placing a person under guardianship is aimed at achieving the protection of the person’s personality, property rights and interests, and other rights and interests of the ward.

The procedure for placing a person under guardianship is initiated by the guardianship authority ex officio, and the initiative to initiate the procedure may be submitted by health and educational institutions or social protection institutions, judicial and other state authorities, associations and citizens. In the procedure for placing a person under guardianship, the guardianship authority shall have territorial jurisdiction according to the place of residence, or stay, of the ward, and territorial jurisdiction for a ward whose residence or stay cannot be determined shall be determined according to the place where the ward was found.

The public is excluded from the guardianship procedure. Data from the records and documentation on guardianship are considered official secrets and are required to be kept confidential by all participants in the procedure to whom such data is available.

The procedure for placing a person under guardianship is urgent. The guardianship authority is obliged to issue a decision on placing a person under guardianship immediately, and no later than 30 days from the date on which it was notified of the need for guardianship over a minor child, or from the date of receipt of the court decision on the deprivation of legal capacity of an adult.

The procedure for placing a person under guardianship has two components: 1) professional and 2) formal-legal. Within the framework of this procedure, it is necessary to respect two types of rules and norms: those that relate to the standards of professional work in the social work centre and the norms that regulate the administrative procedure. The procedure for placing a person under guardianship is

both a professional (in the sense of professional work in social protection) and a strictly formal administrative procedure.

Within the professional procedure of placing a person under guardianship, the provisions and standards prescribed by the Regulation on the organisation, norms and standards of professional work of the social work centre are applied, while the provisions of the Law on General Administrative Procedure are applied in the administrative procedure. The actions of professional workers in the social work centre must be comprehensive and such that all requirements arising from the aforementioned regulations are complied with in a complementary manner.

The procedure is initiated by the guardianship authority in two ways: 1) *ex officio*, or 2) upon the request of a party. The most common situations in which the guardianship authority initiates the procedure for placing a person under guardianship are when: the need for placement under guardianship was discovered by the guardianship authority itself; the need for placement under guardianship was reported to the guardianship authority by a relative; the need for placement under guardianship was reported to the guardianship authority by a citizen, another authority or organisation; the need for placement under guardianship was reported to the guardianship authority by or requested by a court (appointment of a legal representative in a procedure, appointment of a guardian for a person deprived of legal capacity, appointment of a conflict guardian, etc.).

The competent authority shall initiate proceedings *ex officio* when so provided by law or other regulation, and when it determines or learns that, given the existing factual situation, proceedings should be initiated to protect the public interest. The conditions must, as a rule, be met cumulatively, and when the conditions are met, the competent authority must initiate proceedings. The procedure for placing a child under guardianship, according to Article 329 of the Family Law, is initiated by the guardianship authority *ex officio*, and the initiative to initiate the procedure for placing a child under guardianship may be submitted by health and educational institutions or social protection institutions, judicial and other state authorities, associations and citizens. Therefore, all initiatives, representations and warnings (of citizens, associations of citizens, organisations, authorities) must be taken as an incentive to initiate the procedure. The competent authority has no formal obligations towards these entities, i.e., is not obliged to issue a formal act rejecting the initiative or not initiating the procedure, to notify about the initiation of the procedure and to enable participation in the procedure, unless the initiator is a party to the procedure. The competent authority may provide notifications to the initiator, which is desirable and demonstrates a high level of its organisational and communication culture. A person who provides an initiative, representation, warning and does not have the character of a party to the procedure cannot file an appeal against the decision.

A procedure, *ex officio* and at the request of a party, is initiated as soon as the authority performs any action for the purpose of conducting the procedure. A separate formal act on the initiation of the procedure is not necessary. If there are no conditions for initiating the procedure at the request of a party, the authority will reject the request of the party.

The guardianship authority shall take evidence at the request or proposal of the party, as well as *ex officio*. The party shall be obliged to state the facts on which it bases its claim accurately, truthfully and specifically. The party shall be obliged to submit evidence of the facts or to offer evidence, and shall not be required to prove generally known facts. The guardianship authority shall obtain evidence of the facts on which official records are kept, and shall also obtain such evidence as it can obtain more easily and more quickly from the party. As evidence, everything that is suitable for establishing the state of affairs and that is appropriate to the individual case shall be used, such as documents, witnesses, statements of the parties, experts, and an inspection. If evidence is specified by a regulation, then it

must be taken. Evidence may be indirect or direct, and the guardianship authority may delegate the proving of individual facts to the requested authority.

The decision of the guardianship authority in the procedure for placing a person under guardianship must be based on the established legal state of affairs, and to this end, all facts that are important for making a lawful and proper decision must be established. The guardianship authority must establish the following facts: that a person needs guardianship protection; which indicate the specific scope and content of the person's needs that need to be met and protected by guardianship protection measures; which determine who can provide adequate guardianship protection to a specific person.

Based on the decisive facts established in the procedure, the guardianship authority issues a decision. The resolution determines the right, obligation or legal interest of the party. The written resolution contains an introduction, an operative part (statement), an explanation, instructions on legal remedies, the signature of an authorised official and the authority's seal or other form of authentication.

A guardian shall be appointed who has the personal qualities and abilities necessary to perform the duties of a guardian, and who has agreed to be a guardian. The guardian shall primarily be appointed by the spouse, relative or foster parent of the ward, unless the interests of the ward require otherwise. A ward who has reached the age of 10 and is capable of reasoning has the right to propose a person to be appointed as his guardian.

The guardian is obliged to conscientiously care for the ward, and care for the ward includes: personal care, representation, obtaining means of support, and management and disposal of the ward's property.

The guardian is obliged to ensure that the reasons why the adult ward is deprived of legal capacity are eliminated and that he or she is enabled to live independently as soon as possible.

The guardian is obliged to represent the ward. The ward has the same legal capacity as a child under parental care, and the guardian represents the ward in the same way as a parent represents a child. The guardian may, only with the prior consent of the guardianship authority: decide on the ward's education; decide on undertaking medical intervention on the ward; give consent to undertake legal affairs of a ward over the age of 14; undertake legal affairs that manage and dispose of income earned by a ward under the age of 15.

The guardian is obliged to take all necessary measures to obtain funds for the support of the ward. The guardian is obliged to manage the ward's property that the ward did not acquire through work. The guardian is independent in performing the tasks of regular management of the ward's property, and only with the prior consent of the guardianship authority may he or she perform tasks that go beyond the scope of regular management of the ward's property. The guardian disposes of the ward's property that the ward did not acquire through work. The guardian may dispose of the ward's property only with the prior consent of the guardianship authority. The guardian may use the principal of the ward's property only for his support or when some other important interest of the ward so requires. Income from the ward's property may also be used to cover justified expenses incurred during the performance of guardianship duties, or to pay a reward to the guardian, based on a decision of the guardianship authority.

The guardian is liable for damage caused to the ward during the performance of guardianship duties, unless he/she proves that the damage occurred through no fault of his/her.

The guardian is obliged to submit reports and accounts to the guardianship authority on his/her work at the beginning of each calendar year for the previous year (regular report), when the guardianship authority requests it (extraordinary report), or after the termination of guardianship (final report). The guardian's report should contain information on the ward's personality, accommodation conditions, health, upbringing and education, as well as on everything else that is of importance for the ward's personality. The report should also contain information on the management the disposition of the ward's property and the ward's income and expenses in the past period, as well as the final balance of his property.

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

Accommodation for victims of human trafficking is one of the key elements in the process of protection and rehabilitation of victims of human trafficking. Providing a safe and supportive environment is essential for the recovery of victims and their successful integration into society. The services of the Shelter for Victims of Human Trafficking (women and girls up to 16 years of age) provided by the Centre for the Protection of Victims of Human Trafficking guarantee the safety of the victim, while ensuring anonymity and confidentiality. The Centre for the Protection of Victims of Human Trafficking received the space as well as the expansion of professional capacities in 2022, when the Ministry of Labour, Employment, Veteran and Social Affairs granted the Shelter an operating license.

Based on the Conclusion of the Government of the Republic of Serbia from July 2025, the Ministry of Labour, Employment, Veteran and Social Affairs was designated as the user of real estate in Belgrade in order to provide the space necessary for the work of the Centre for the Protection of Victims of Human Trafficking. In accordance with the Conclusion, the Republic Property Directorate of the Republic of Serbia allocated a dedicated apartment for accommodation services for men. The implementation of the conditions for providing accommodation to male victims of human trafficking is underway.

Also, in addition to the specialised services provided by the Centre for the Protection of Victims of Human Trafficking, supported housing services are also provided by civil society organisations that meet the standards for obtaining a license to operate. The "Supported Housing" service is provided by the Citizens' Association for the Fight against Human Trafficking and All Forms of Violence against Women "Atina", which is in the process of renewing its license that expired in 2024.

In urgent situations, shelters for victims of domestic violence as well as specialised foster families can provide accommodation services for victims of human trafficking.

Accommodation for victims of human trafficking is organised through the referral authority of the social work centre, with the support of the Centre for the Protection of Victims of Human Trafficking, the police, service providers, and other cooperating institutions and organisations.

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

The Centre for the Protection of Victims of Human Trafficking has recognised people with disabilities as a particularly vulnerable group. People with intellectual and mental disabilities are particularly at risk, especially those who live and work on farms that are far from settlements, given that in addition to their disability, they are additionally vulnerable due to social isolation.

During 2024, seven people from this population were identified who were exploited, mainly in agriculture, and they received assistance and support according to individualised plans, specifically tailored to their needs.

In accordance with the Law on the Rights of Beneficiaries of Temporary Accommodation Services in Social Protection, the user has the right to appeal the decision on the use, extension, or termination of the use of the accommodation service and it can be filed by the adult user in person, regardless of the degree of legal capacity, or by the legal representative of a minor user, in accordance with the law.

Also, a user, a trusted person or a member of their immediate family may file a complaint if they believe that the service provider is violating the rights of the user, or are not satisfied with the quality of the service, the action or behaviour of the service provider or another person. The complaint may be filed with the responsible person in the institution, or with the service provider, the competent social work centre and other competent authorities, in accordance with the law and regulations adopted on the basis of the law. An adult beneficiary, regardless of the level of legal capacity, a trusted person, a member of their immediate family, or the legal representative of a minor beneficiary may file an objection regarding the manner in which accommodation services are provided, if no other legal remedy can be declared in the administrative procedure.

**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;**

The Law on Asylum and Temporary Protection,<sup>50</sup> in Article 17, provides for the identification of vulnerable persons by the competent authorities on a continuous basis, and at the earliest after the initiation of the asylum procedure, i.e., the expression of the intention to submit an asylum application, as well as the implementation of appropriate protection measures throughout the procedure and stay. In practice, the identification of these persons is carried out in several stages.

When a person expresses their intention to apply for asylum at the border control point upon entering the Republic of Serbia or on the territory of the Republic of Serbia, police officers (through a short interview and observation) can identify signs of vulnerability, such as: minor (if the person is unaccompanied), disability, old age, pregnancy, victims of torture, rape and human trafficking. In practice, this first phase is based on a visual assessment and a short interview.

After expressing their intention, the person is referred by police officers to one of the reception centres or asylum centres, where the Commissariat for Refugees and Migration is tasked with conducting a more detailed vulnerability assessment, through interview and observation, and deciding on appropriate accommodation and access to services (e.g., medical assistance, psychological support, special conditions for women with children, etc.).

For particularly vulnerable groups (e.g., unaccompanied minors, victims of torture and/or human trafficking), social work centres are involved to place temporary guardians and non-governmental organisations that assist in identification and provide additional services such as legal, psychosocial assistance, translation, etc.

The Asylum Office, as an organisational unit of the Ministry of the Interior responsible for the asylum procedure, has an obligation to take into account the special procedural needs of individuals, in terms

---

<sup>50</sup> <https://www.paragraf.rs/propisi/zakon-o-azilu-i-privremenoj-zastiti.html>

of interview conditions (e.g., adjusted times, longer and more frequent breaks), the appointment of a temporary guardian, as well as the priority processing of cases of vulnerable persons.

When a vulnerability related to human trafficking is detected or suspected in an asylum seeker in the Republic of Serbia, a specific multi-sectoral procedure for identification, protection and support is initiated. Vulnerability may be detected when expressing the intention to seek asylum, during the stay in an asylum centre/reception centre or during an interview in the asylum procedure. When it is suspected that a person is a victim of human trafficking, the Centre for the Protection of Victims of Human Trafficking is immediately notified.

Before the victim status is formally proven, the person is treated as a potential victim and has the right to safe accommodation, psychological and medical assistance, legal assistance (such as free legal advice), interpreters and guardians, if the person is an unaccompanied minor.

If an asylum seeker is found to be a victim of human trafficking, they may be granted asylum if there is a risk of re-victimisation in their country of origin. The asylum procedure is conducted with special procedural guarantees: re-victimisation is avoided (e.g., traumatic interrogations), the interview is conducted under special conditions (e.g., adjusted terms, longer and more frequent breaks) and the case is considered a priority.

If the victim remains in Serbia, he/she is included in psychosocial rehabilitation and reintegration programmes, after which he/she can participate in education, training and work activities. Information on policies and measures implemented by the Republic of Serbia regarding asylum seekers and potential victims of human trafficking:

The Law on Asylum and Temporary Protection<sup>51</sup> (Article 13 and Article 56) obliges the competent authorities to provide the asylum seeker with information in a language that he or she understands or can reasonably be assumed to understand, about the rights and obligations in the asylum procedure, about the rights and obligations related to material reception conditions, about organisations that provide assistance and information to asylum seekers, and about available protection mechanisms, if the person is a potential victim of human trafficking.

In practice, when asylum seekers express their intention to apply for asylum and at the asylum centre, they are given information brochures in multiple languages (Arabic, Dari, Pashto, Urdu, English, French, etc.), and during the interview, the Asylum Office and NGOs provide oral explanations and legal guidance with the help of interpreters, while UNHCR and IOM have developed mobile applications and information materials available via the internet and QR codes at asylum centres and at all major border crossings.

The Commissariat for Refugees and Migration organises thematic info sessions in all asylum and reception centres, independently or in cooperation with other competent authorities, international organisations and specialised civil society organisations, which are intended to inform the beneficiaries. In addition, specialised sessions and educational workshops are regularly held in asylum and reception centres to inform beneficiaries as an identification measure aimed at the beneficiaries themselves – how to recognize and protect themselves from human trafficking and other risks, and are conducted by specialised civil society organisations.

---

<sup>51</sup> <https://www.paragraf.rs/propisi/zakon-o-azilu-i-privremenoj-zastiti.html>



During the first six months of 2025, 46 information workshops on the topic of protection from human trafficking were conducted. During 2024, 97 workshops were held, attended by 295 participants (276 adults and 19 minors), during 2023, 105 workshops were held, attended by 324 participants (298 adults and 26 minors), while during 2022, a total of 125 workshops were held, attended by 287 participants (231 adults and 56 minors).

All workshops are conducted in languages that the beneficiaries understand, and individual counselling is organised if necessary. The Commissariat has signed memorandums of cooperation with specialised organisations in the field of protection against human trafficking as well as with the Centre for the Protection of Victims of Human Trafficking. The schedule of visits of all organisations is prominently displayed and translated into the languages that the beneficiaries speak. All contact details of relevant organisations are posted on the centre's bulletin boards.

The Serbian Red Cross conducts informative lectures and interactive workshops for migrants and asylum seekers accommodated in reception centres in cooperation with the Commissariat for Refugees and Migration. An online platform has been created to provide information about the services provided by the Serbian Red Cross, educational content about risks on the migration route, adequate precautionary measures, and other educational content, which is constantly updated. The platform<sup>52</sup> is practical, accessible via electronic devices by scanning QR codes that are displayed in visible places in the reception centres, and has the ability to be translated into a large number of languages.

#### **b. access to legal assistance and representation;**

Law on Asylum and Temporary Protection<sup>53</sup> (Art. 56) guarantees an asylum seeker the right to free legal aid and representation by associations whose goals and activities are aimed at providing legal aid to asylum seekers and persons granted the right to asylum, as well as free legal assistance from the UNHCR. The right to free legal aid includes: legal advice, drafting submissions, representation before authorities and filing complaints and lawsuits.

Civil society organisations and international organisations that provide free legal assistance and representation have unhindered access to asylum and reception centres.

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

Until a final decision on the asylum application is made, the asylum seeker is provided with material reception conditions (accommodation, food, clothing) in an asylum centre or other facility intended for the accommodation of asylum seekers, which is under the jurisdiction of the Commissariat for Refugees and Migration.

The Law on Asylum and Temporary Protection provides for special procedural and reception guarantees for victims of human trafficking, which are provided to all potential or identified victims of human trafficking who reside in asylum centres and private centres. The assessment of the best accommodation and coordination of services is carried out in cooperation with the Centre for the Protection of Victims of Human Trafficking.

All accommodation facilities managed by the Commissariat for Refugees and Migration are equipped and aligned with the accommodation standards prescribed by the European Asylum Agency and are suitable for longer stays, and the Commissariat, within its competence, has provided all potential victims with material reception conditions, which include: accommodation, clothing, footwear, personal and collective hygiene products. Also, all these persons are provided with three meals a day

---

<sup>52</sup> <https://migrations-redcross.info/>

<sup>53</sup> <https://www.paragraf.rs/propisi/zakon-o-azilu-i-privremenoj-zastiti.html>

as well as adapted nutrition in accordance with religious preferences and health needs. In addition, persons are provided with other products and services, such as school equipment and supplies for all school children, etc., in accordance with their individual needs.

In addition to material reception conditions, all persons are provided with all other services in the centre, such as access to healthcare within the centre's outpatient clinic and in other health institutions as needed, including transportation and interpreters, as well as psycho-social support. Occupational, sports and recreational activities are organised daily, as well as educational activities such as learning foreign languages, sewing classes, etc. All persons have unhindered access to free legal aid, translation services, etc. During their stay in the centres managed by the Commissariat, persons who are at greater risk or are potential victims are accommodated in special separate units or rooms in order to ensure their additional safety. Physical and technical security is engaged in the centres where they stay, video surveillance is in function, and the Commissariat's reception officers are present in the centre 24/7.

In the case of potential or identified victims of human trafficking, services are provided in coordination with the Centre for the Protection of Victims of Human Trafficking.

**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 Law on the Employment of Foreigners<sup>54</sup> stipulates the principle of equal treatment, i.e., a foreigner who is employed, or temporarily employed, in the Republic of Serbia in accordance with this law has the same rights and obligations in terms of work, employment and self-employment as citizens of the Republic of Serbia, if the conditions in accordance with the law are met.

This law is also based on the concept of protecting the domestic labour market, primarily through the implementation of a labour market test. The application of the concept of implementing a labour market test implies that a foreigner can be employed in the Republic of Serbia only when it is determined that there are no domestic citizens in the records of the National Employment Service who meet the conditions of the employer's request for a specific job position.

**b. provision of clear employment contracts;**

An employer may conclude an employment contract with a foreigner in accordance with the law regulating labour.

An employer may not employ or use the labour of a foreigner who is illegally residing in the Republic and who does not meet the conditions for employment, i.e., temporary employment.

The organisation responsible for employment matters in the procedure for issuing a single permit assesses the fulfilment of the conditions for the employment of foreigners, special cases of employment or self-employment of foreigners, by assessing the evidence that is submitted as mandatory with the application for issuing a single permit.

One of the pieces of evidence necessary for assessing the eligibility for issuing a single permit for the employment of a foreigner is the existence of an employment contract or other agreement by which the foreigner exercises rights based on work without establishing an employment relationship. These contracts must be in line with the positive legal regulations of the Republic of Serbia regulating work. The assessment of this evidence within the procedure for issuing a single permit/or visa for a long-term stay based on employment is carried out by the National Employment Service.

<sup>54</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_zaposljavanju\\_stranaca.html](https://www.paragraf.rs/propisi/zakon_o_zaposljavanju_stranaca.html)

The Law on the Employment of Foreigners<sup>55</sup> stipulates the principle of equal treatment, i.e., a foreigner who is employed, or temporarily employed, in the Republic of Serbia in accordance with this law has the same rights and obligations in terms of work, employment and self-employment as citizens of the Republic of Serbia, if the conditions in accordance with the law are met.

This law is also based on the concept of protecting the domestic labour market, primarily through the implementation of a labour market test. The application of the concept of implementing a labour market test implies that a foreigner can be employed in the Republic of Serbia only when it is determined that there are no domestic citizens in the records of the National Employment Service who meet the conditions of the employer's request for a specific job position.

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

Foreign citizens may register with the National Employment Service as unemployed persons, if they meet the requirements set out in the law and have the necessary documentation confirming their status. A foreigner who was compulsorily insured for unemployment and who, after being employed, registers with the National Employment Service as unemployed persons may exercise the right to financial compensation if other prescribed conditions set out in the law are also met.

When it comes to providing employment support, this category of unemployed persons, in addition to exercising the right to information, advice and mediation in employment, may also exercise the right to support in the form of financial incentives, if the need for it has been established. Namely, if during the assessment of employability it is determined that a person cannot be integrated into the labour market due to the existence of limiting factors, and that his/her inclusion in an active employment policy measure that involves financial support to the employer or the person, and which is agreed upon in an individual employment plan, the foreigner may be included in it in accordance with the terms of the public call/competition.

We emphasize that when determining a person's needs, a number of factors that may affect employability are taken into account. In addition to education/acquired qualifications, work experience, additional knowledge and skills, and job offers, employability is also influenced by personal characteristics such as attitudes, motivation, expectations from the labour market, social status, family circumstances, duration of unemployment and other socio-psychological aspects that may adversely affect a person's ability to integrate into the labour market. We especially emphasize and remind you that measures that involve financial incentives are primarily intended for unemployed persons who face multiple factors hindering employability and whose employment is not possible without the provision of intensive services.

**d. possibility to change employers;**

The Law on Amendments and Supplements to the Law on Employment of Foreigners<sup>56</sup> stipulates that a foreigner who has been granted a single residence and work permit may change his employer, change the basis of work or be employed by two or more employers. The act of consent that allows a foreigner to change his employer, basis of work or be employed by two or more employers is issued by the National Employment Service.

Article 11, paragraph 2 of the Law on the Employment of Foreigners<sup>57</sup> stipulates that during the validity of a single permit, a foreigner, or an employer on behalf of a foreigner or a legal or natural person authorised by a foreigner or employer, may submit a request for a change in the basis of work,

<sup>55</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_zaposljavanju\\_stranaca.html](https://www.paragraf.rs/propisi/zakon_o_zaposljavanju_stranaca.html)

<sup>56</sup> [https://www.paragraf.rs/izmene\\_i\\_dopune/270723-zakon-o-izmenama-i-dopunama-zakona-o-zaposljavanju-stranaca.html](https://www.paragraf.rs/izmene_i_dopune/270723-zakon-o-izmenama-i-dopunama-zakona-o-zaposljavanju-stranaca.html)

<sup>57</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_zaposljavanju\\_stranaca.html](https://www.paragraf.rs/propisi/zakon_o_zaposljavanju_stranaca.html)

a change of employer or for employment with two or more employers, electronically on the Single Portal, within the service intended for issuing a single permit to a foreigner, in the manner and in accordance with the instructions for using the service intended for issuing a single permit to a foreigner.

Article 2, paragraph 1, item 15) of the Law on the Employment of Foreigners stipulates that consent is an act that allows a foreigner to change the basis of work, change employer, or be employed by two or more employers during the period of validity of a single permit, and is issued by an organisation competent for employment matters, in accordance with the law.

**e. access to confidential complaints mechanisms;**

The request for issuing consent is decided by the locally competent organisational unit of the organisation responsible for employment matters, within 10 days from the date of receipt of the proper request, and the consent is delivered to the applicant through the Unified Portal.

The final decision on an appeal against the consent act shall be made by the minister responsible for employment affairs.

Foreign citizens can contact the Labour Inspectorate and report irregularities and illegalities by their employer, both by providing personal data and anonymously, electronically, by telephone, in writing, or by visiting the labour inspection offices throughout the territory of the Republic of Serbia. Upon submission of reports, labour inspectors will conduct inspections within the scope of the labour inspection, and data on the applicants will be kept confidential. Contact details of labour inspection offices in administrative districts and the City of Belgrade can be accessed via the link.<sup>58</sup>

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

In order to reduce the vulnerability of migrant workers to human trafficking, the International Labour Organisation (ILO) in the Republic of Serbia, within the project “Improving Access to and Efficiency of Internal Complaints Mechanisms in the Republic of Serbia”, conducted trainings that primarily related to freedom of association and collective bargaining, and the prevention of child and forced labour, as well as improving occupational safety and health within companies operating in the Republic of Serbia and located in the supply chains of German companies. The project on due diligence in supply chains covered 34,000 workers from 31 companies, and information campaigns were also carried out, reaching another 600 union members.

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

The actions of the Border Police Directorate of the Ministry of the Interior in terms of reducing the vulnerability of migrant workers to human trafficking in the area of legal channels for regulating their stay in the country are carried out within the framework of matters related to the entry, movement and stay of foreigners in the territory of the Republic of Serbia. The procedure begins already when submitting a visa application at the diplomatic and consular missions of the Republic of Serbia abroad, since before issuing a visa, the diplomatic and consular mission obtains prior consent from the Ministry of the Interior.

Prior consent is given based on the results of the assessment of the organisational unit of the Ministry of the Interior that performs tasks related to the movement and stay of foreigners, according to the place of arrival of the foreigner, based on the results of the assessment of the state body responsible for protecting the security of the Republic of Serbia and based on other operational knowledge available in the specific case, and when issuing a D visa for a long stay on the basis of employment,

---

<sup>58</sup> <https://www.minrzs.gov.rs/sr/kontakt>

the organisation responsible for employment affairs submits an assessment of whether the foreigner meets the conditions for employment in the Republic of Serbia.

For this purpose, the data of the applicant and the caller are checked, by reviewing the records kept in accordance with the law. This is the moment when it is determined how the invitee came to the foreign citizen for whom he or she gave a guarantee, i.e., whether there was mediation by employment agencies and temporary employment agencies, foreign or domestic, and this information may be important for further operational work aimed at combating the phenomenon of human trafficking. At the same time, the credibility of the statements in the documentation attached to the visa application is determined and the justification of the purpose of the trip is determined, and the invitee is clearly presented with the obligations and responsibilities related to the arrival of the foreigner to the Republic of Serbia.

Regarding the procedure for granting temporary residence, it should be noted that on 1 February 2024, the provisions of the Law on Amendments and Supplements to the Law on Foreigners,<sup>59</sup> which relate to the electronic submission of applications for the issuance of a single permit for temporary residence and work of a foreigner, began to be implemented. The reasons for employment under an employment contract or other contract that exercises rights based on work are: self-employment, seconded persons, movement within a company, independent professional, training and advanced training. With these amendments, the Ministry of the Interior, or rather the organisational units for foreign affairs in regional police departments, has taken over the role of a single administrative point and enabled the submission of a single request that can be submitted by a foreigner or his employer on behalf of the foreigner (individually or through a group request), thus establishing a new single (unified) procedure, which replaced the previous obligation of the foreigner to first regulate temporary residence in accordance with the provisions of the Law on Foreigners, and after that, the employer or the foreigner himself submits a request for the issuance of a work permit, in accordance with the provisions of the Law on the Employment of Foreigners. A single permit can be issued to a foreigner for a period of validity of up to three years, and is issued in the form of a biometric card document.

Information collected during checks carried out for the purpose of granting prior consent for the issuance of visas, as well as in the procedure for approving a single residence and work permit, and proactive monitoring, is used for the purpose of preventing and combating human trafficking for the purpose of labour exploitation, by forwarding the information obtained to the competent authorities such as the Labour Inspectorate and the Criminal Police Directorate.

Information for foreigners regarding the implementation of the Law on Foreigners, which relates to the grounds and reasons for regulating temporary residence, is available on the website of the Ministry of the Interior in Serbian and English.

The list of employment agencies and temporary employment agencies<sup>60</sup> that have been issued work permits is available on the website of the National Employment Service.

In order to protect this category of particularly vulnerable persons, measures were implemented in 2024 to ensure that grounds for residence, such as temporary residence of a foreigner presumed to be a victim of human trafficking and temporary residence for victims of human trafficking, are not entered on the temporary residence permit card.

---

<sup>59</sup> [https://www.paragraf.rs/izmene\\_i\\_dopune/270723-zakon-o-izmenama-i-dopunama-zakona-o-strancima.html](https://www.paragraf.rs/izmene_i_dopune/270723-zakon-o-izmenama-i-dopunama-zakona-o-strancima.html)

<sup>60</sup> <https://www.nsz.gov.rs/live/nudite-posao/agencije-za-posredovanje-u-zaposljavanju.cid170>

**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?**

The Ministry of Labour, Employment, Veteran and Social Affairs, which includes the Labour Inspectorate, fully supervises the implementation of applicable regulations in the field of labour law and occupational safety and health with available human, financial and technical capacities. The Labour Inspectorate conducts regular, extraordinary, control and supplementary inspections in all economic sectors, and in high-risk sectors where labour exploitation, undeclared work and unregistered work are expected to exist, it organizes and conducts enhanced inspections, both independently and with other inspectorates and authorities, in order to maximize the effects on determining the possible existence of labour exploitation, on the implementation of occupational safety and health measures and on combating undeclared work and unregistered work. The Labour Inspectorate organizes and implements enhanced extraordinary inspections in a specific activity and in a specific territory, both during regular working hours, at night and on weekends and holidays, often according to the principle of so-called “rotation” of labour inspectors, which actually means that inspectors conduct inspections in territories where they do not normally work.

The Labour Inspectorate pays special attention to the existence of possible indicators of human trafficking in inspections during which foreign citizens are found employed, as well as seasonal workers. During inspections in which foreign citizens are found employed, labour inspectors determine whether these persons are employed in accordance with the Law on the Employment of Foreigners,<sup>61</sup> the Law on Simplified Employment in Seasonal Jobs in Certain Activities,<sup>62</sup> the Labour Law,<sup>63</sup> the Law on Occupational Safety and Health<sup>64</sup> and other relevant regulations, and pay special attention to the detection of possible indicators of human trafficking for the purpose of labour exploitation.

Within the project “Prevention and Combating Trafficking in Human Beings in Serbia”, which is implemented in the Republic of Serbia by the Council of Europe within the framework of the joint support programme of the European Union and the Council of Europe for the Western Balkans, since October 2016, activities aimed at strengthening cooperation between authorities and services dealing with the fight against trafficking in human beings in Serbia have been continuously implemented. Also of great importance are the basic and advanced trainings implemented within the project for labour inspectors, as well as the HELP course implemented by the Council of Europe Office in Belgrade on the topic of combating trafficking in human beings for the purpose of labour exploitation.

Within the framework of the aforementioned project, all labour inspectors underwent basic training, except for labour inspectors who established an employment relationship in the recent period.

Within the framework of the aforementioned project, a Guide for Labour Inspectors on the Detection and Preliminary Identification of Victims of Human Trafficking<sup>65</sup> was developed, which provides clear and concise guidance to labour inspectors on how to recognize potential risks of human trafficking, how to approach determining decisive facts, and who to contact for further processing and determining all decisive facts.

<sup>61</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_zaposljavanju\\_stranaca.html](https://www.paragraf.rs/propisi/zakon_o_zaposljavanju_stranaca.html)

<sup>62</sup> <https://www.paragraf.rs/propisi/zakon-pojednostavljenom-radnom-angazovanju-sezonskim-poslovima.html>

<sup>63</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_radu.html](https://www.paragraf.rs/propisi/zakon_o_radu.html)

<sup>64</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_bezbednosti\\_i\\_zdravlju\\_na\\_radu.html](https://www.paragraf.rs/propisi/zakon_o_bezbednosti_i_zdravlju_na_radu.html)

<sup>65</sup> <https://www.minrzs.gov.rs/sr/dokumenti/ostalo/vodic-za-inspektore-rada-o-detekciji-i-preliminarnoj-identifikaciji-zrtava-trgovine-ljudima>

At the expert consultation of the Labour Inspectorate held from 23 to 25 September 2024, a total of 100 labour inspectors participated in training on the topic of combating human trafficking. A representative of the Republic Institute for Social Protection held a training on the topic of “Detecting human trafficking for the purpose of labour exploitation and identifying victims, cooperation of the labour inspectorate with social work centres in the field of human trafficking and child labour abuse”.

In order to improve coordination between the labour inspectorate, members of the Ministry of the Interior and public prosecutors’ offices in identifying victims of human trafficking and prosecuting those responsible, a Protocol on Cooperation in Combating Human Trafficking was signed in June 2018 between the Ministry of Labour, Employment, Veteran and Social Affairs, the Ministry of the Interior and the Republic Public Prosecutor’s Office.

When one of the services receives information indicating possible forms of human trafficking related to the work process, members of the Ministry of the Interior and the Labour Inspectorate organize joint inspections and establish decisive facts, on the basis of which the locally competent Higher Public Prosecutor’s Office decides on the existence of elements of the criminal offence of human trafficking under Article 388 of the Criminal Code of the Republic of Serbia.

Regarding human trafficking, the Labour Inspectorate cooperated with the services of the Ministry of the Interior through joint work and exchange of information, as well as with non-governmental agencies for the fight against human trafficking through the exchange of information. Labour inspectors carried out extraordinary, joint inspections in cooperation with police officers of the Ministry of the Interior, the Directorate for Foreigners, in order to control the legal status of foreign citizens employed in the Republic of Serbia and to provide them with single permits for temporary residence and work. During the above inspections, violations of labour regulations were identified and corrective and repressive measures were taken within the scope of the Labour Inspectorate’s competence, but labour inspectors did not identify indicators of human trafficking for the purpose of labour exploitation. The Labour Inspectorate cooperates with representative employee associations in order to more effectively protect the rights of employees. Cooperation is implemented through consideration of the most important issues in the field of labour relations and occupational health and safety in order to undertake specific activities, through the exchange of information, primarily with the aim of combating undeclared work and reducing the number of injuries at work.

The Inspectorate for Labour and Inspections and the bodies participating in the work of the Working Group for Suppression of Informal Work – tourism inspection, market inspection, field control of the Tax Administration and the Ministry of the Interior – carried out a total of 1,738 joint inspections. In addition to the inspections and bodies participating in the work of the Working Group for Suppression of Informal Work, the sanitary inspection, traffic inspection, emergency inspection, veterinary inspection, communal inspection and communal militia also participated in some joint inspections.

Also, joint inspections were carried out within the framework of the Working Group for the Coordination of Republican Inspections in the Control of Measures to Prevent the Spread of the COVID-19 Infectious Disease Caused by the SARS-CoV-2 Virus:

The Labour Inspectorate carried out a total of 4,212 joint and coordinated inspections with other republican inspectorates, local government unit inspectorates and other state bodies throughout the territory of the Republic of Serbia in the period from 1 January to 11 March 2022, in order to suppress the spread of the epidemic of the infectious disease Covid-19 caused by the SARS-CoV-2 virus, over the implementation of anti-epidemic measures prescribed by the Law on the Protection of the

Population from Infectious Diseases, the Regulation on Measures for the Prevention and Suppression of the Infectious Disease COVID-19, the Order on the Prohibition of Gatherings in Public Places in Indoor and Outdoor Spaces in the Republic of Serbia, and the Rulebook on Preventive Measures for Safe and Healthy Work to Prevent the Occurrence and Spread of the Epidemic of Infectious Diseases.

At its session held on 27 December 2024, the Coordination Commission adopted a Decision on the establishment of a Working Group for Monitoring and Harmonising the Implementation of Inspection Supervision in the Field of Informal Work, headed by the Director of the Labour Inspectorate, and whose members are representatives of:

- Labour Inspectorate
- Social protection inspections
- Tax administrations, Ministry of Finance
- MDFT – Ministry of Domestic and Foreign Trade
- Department for Control of Inspectors' Work, Ministry of Tourism and Youth
- Sector for Inspection Supervision, Ministry of Construction, Transport and Infrastructure
- Department for Inspection Affairs, Ministry of Sports
- Departments in the Logistics Sector III, Department for Labour and Administrative Legal Affairs, Human Resources Directorate, Ministry of the Interior
- Crime Suppression Departments, Crime Suppression Services, Criminal Police Directorates, Ministry of the Interior
- NALED

The tasks of the Working Group include harmonisation, coordination and improvement of inspection supervision in the field of informal work and on certain inspection supervision issues, which are within the scope of two or more inspections or whose nature requires the participation of two or more inspections, as well as other bodies and organisations, in order to increase comprehensiveness and effectiveness in achieving legal and safe operations and actions of supervised entities in a certain area, avoiding overlap and unnecessary repetition of inspection supervision, achieving legal certainty, law enforcement, effective risk management and improving business conditions.

The members of the working group achieve the objectives through cooperation in harmonising inspection plans, determining the working group's work programme, organising and conducting joint inspections, cooperation in conducting independent inspections (mutual information and exchange of data and experiences, pointing out examples of good practice and other forms of mutual assistance), harmonising inspection practices, and taking other appropriate actions and measures to achieve the objectives.

**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?**

The Law on Employment and Unemployment Insurance<sup>66</sup> stipulates the conditions for the establishment and operation of employment agencies. In the legal system of the Republic of Serbia, the bearers of employment affairs are the National Employment Service and employment agencies. Employment agencies, as private bearers of employment affairs in the Republic of Serbia, are subject to the licensing system (obtaining a work permit), which is issued by the Ministry of Labour, Employment, Veteran' Affairs and Social Affairs in a complex procedure in which the spatial and

<sup>66</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_zaposljavanju\\_i\\_osiguranju\\_za\\_slucaj\\_nezaposlenosti.html](https://www.paragraf.rs/propisi/zakon_o_zaposljavanju_i_osiguranju_za_slucaj_nezaposlenosti.html)



technical conditions and professional qualifications of employees are checked, as well as other conditions are checked in direct cooperation with inspection and other competent authorities, depending on the specific case.

The operations of employment agencies are subject to supervision by competent authorities and inspections, depending on the subject of control, and in their operations, they are subject to both misdemeanour and criminal liability.

The Law on Employment and Unemployment Insurance stipulates the obligation to provide employment services to unemployed persons free of charge, so that unemployed persons cannot be charged any costs in the process of employment mediation and job search.

The Labour Inspectorate carried out 57 inspections of temporary employment agencies over the implementation of the Law on Agency Employment in the period from 2022 to 2024.

Also, in the period from 2022 to 2024, the labour inspectorate carried out 14 inspections of the implementation of the aforementioned Law at user employers where, under their supervision and management, seconded employees in an employment relationship with a temporary employment agency temporarily perform work in accordance with the Law on Agency Employment.

The Ministry of Internal and Foreign Trade, Market Inspection Sector, acts in accordance with the Law on Inspection Supervision<sup>67</sup> and the Law on Advertising,<sup>68</sup> and with its activities contributes to the prevention of phenomena that may be related to human trafficking. Although the prevention of human trafficking is not the primary objective of the market inspection defined by law, it represents one of the priorities in their work, especially when it comes to combating illegal employment. This goal is achieved through cooperation with other relevant ministries and civil society organisations.

The Market Inspectorate supervises economic entities, including employment and advertising agencies, as well as individuals engaged in employment activities without proper registration. Inspection supervision is carried out based on requests from the Ministry of Labour, Employment, Veteran and Social Affairs, the Ministry of the Interior, but also based on reports from civil society organisations.

Inspectors are also conducting internet investigations to identify unregistered entities advertising jobs via social media and other online platforms.

When market inspectors determine that someone is illegally carrying out employment activities, appropriate measures are taken. Requests for the initiation of misdemeanour proceedings are filed against individuals who work without registration. In the event that it is determined that business entities are carrying out employment mediation activities without an appropriate work permit issued by the Ministry of Labour, Employment, Veteran and Social Affairs, inspectors issue a decision prohibiting the performance of that activity, as well as a decision prohibiting advertising.

In addition, in all cases, requests are submitted to initiate misdemeanour proceedings in accordance with applicable regulations.

---

<sup>67</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_inspekcijskom\\_nadzoru.html](https://www.paragraf.rs/propisi/zakon_o_inspekcijskom_nadzoru.html)

<sup>68</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_oglasavanju.html](https://www.paragraf.rs/propisi/zakon_o_oglasavanju.html)

**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 Ministry of Labour, Employment, Veteran and Social Affairs, the Labour Inspectorate, in accordance with its jurisdiction and legal powers, carries out inspections covering self-employed, registered and unregistered business entities, contractors and subcontractors, and also supervises the posting of workers. In accordance with the established factual situation, labour inspectors take appropriate measures within the jurisdiction of the labour inspectorate.

In 2022, the Labour Inspectorate carried out 26 inspections of the implementation of the Law on Agency Employment<sup>69</sup> in temporary employment agencies, of which 6 were ex officio, 3 inspections by employee representatives, 1 control inspection and 16 inspections to determine whether the spatial and technical conditions for the operation of the temporary employment agency were met based on submitted requests. The inspections covered 73 employees.

The inspections carried out on 16 submitted requests determined that the prescribed conditions were met and 16 decisions were issued on the fulfilment of the prescribed conditions for the operation of temporary employment agencies.

During the inspections carried out in employment agencies ex officio and upon submitted representations, labour inspectors issued 7 warnings, 1 decision, 1 measure on 1 record, 1 decision on a work ban, and filed 2 requests to initiate misdemeanour proceedings based on the identified irregularities.

Also, in 2022, the labour inspection carried out 7 inspections of the implementation of the aforementioned Law at user employers where, under their supervision and management, seconded employees in an employment relationship with a temporary employment agency temporarily perform work in accordance with the Law on Agency Employment. Out of a total of 7 inspections, 6 were ex officio inspections, as well as 1 inspection to control the implementation of the decision. The inspections covered 14 seconded employees.

During the inspections carried out at the employers of the beneficiaries ex officio, labour inspectors issued four decisions with five imposed measures based on the identified irregularities and submitted 1 request to initiate misdemeanour proceedings.

In 2023, the Labour Inspectorate carried out 15 inspections of the implementation of the Law on Agency Employment in temporary employment agencies, of which 1 was ex officio, 1 inspection based on employee representations, and 13 inspections to determine whether the spatial and technical conditions for the operation of the temporary employment agency were met based on submitted requests. The inspections covered 6 employees.

The inspections carried out on 13 submitted requests determined that the prescribed conditions were met for 12 submitted requests and 12 decisions were issued on the fulfilment of the prescribed conditions for the operation of the Temporary Employment Agency.

During inspections carried out in employment agencies ex officio and upon submission of a complaint, labour inspectors issued 3 decisions based on the irregularities found.

---

<sup>69</sup> <https://www.paragraf.rs/propisi/zakon-o-agencijskom-zaposljavanju.html>

Also, in 2023, the Labour Inspectorate carried out 6 inspections of the implementation of the aforementioned Law at user employers where, under their supervision and management, seconded employees in an employment relationship with a temporary employment agency temporarily perform work in accordance with the Law on Agency Employment. The inspections were carried out based on submitted representations. The inspections covered 6 seconded employees.

During inspections carried out at the user employers based on submitted representations, labour inspectors did not identify any irregularities.

In 2024, the Labour Inspectorate carried out 16 inspections of temporary employment agencies over the implementation of the Law on Agency Employment, of which 15 inspections were to determine whether the spatial and technical conditions for the operation of the temporary employment agency were met based on submitted requests, as well as 1 extraordinary inspection. The inspections covered 11 employees.

The inspections carried out on 15 submitted requests determined that the prescribed conditions were met and 15 decisions were issued on the fulfilment of the prescribed conditions for the operation of temporary employment agencies.

The inspection conducted at the employer who hired foreign citizens found that the employer did not act in accordance with Article 35 of the Law on Agency Employment,<sup>70</sup> because he or she sent employees to work for another employer without a previously obtained permit, or without previously registered activity in accordance with the provisions of this law, which is why the labour inspector filed 1 request for the initiation of misdemeanour proceedings against the legal entity and the responsible person in the legal entity.

In the period January – July 2025, the Labour Inspectorate carried out 9 inspections of the implementation of the Law on Agency Employment in temporary employment agencies, all 9 inspections to determine whether the spatial and technical conditions for the operation of the temporary employment agency were met based on the submitted requests. The inspections covered 4 employees.

The inspections carried out on 9 submitted requests determined that the prescribed conditions were met and 9 decisions were issued on the fulfilment of the prescribed conditions for the operation of temporary employment agencies.

Also, in the period January – July 2025, the labour inspection carried out 3 inspections of the implementation of the aforementioned Law at user employers where, under their supervision and management, seconded employees in an employment relationship with a temporary employment agency temporarily perform work in accordance with the Law on Agency Employment. The inspections were carried out based on the submitted representations of the employees.

During the inspection carried out at the user's employer upon submission of the complaint, labour inspectors did not identify any irregularities.

The Labour Inspectorate acts in all respects in accordance with the valid lists within its jurisdiction and in accordance with legal authorities.

---

<sup>70</sup> <https://www.paragraf.rs/propisi/zakon-o-agencijskom-zaposljavanju.html>

**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?**

The focus of the legislation and policies of the Republic of Serbia on preventing human trafficking, enabling legal migration and legal employment opportunities is reflected in the adoption of laws and by-laws regulating the conditions for the entry, movement, residence and return of foreigners. In this regard, the Regulation on the submission of applications for the issuance of visas electronically and the approval of visas<sup>71</sup> began to be implemented on 1 March 2025, in accordance with which employers are enabled to submit an application for a long-stay visa on behalf of a foreigner on the basis of employment or on the basis of performing seasonal work within the meaning of the law regulating simplified work engagement in seasonal work in certain industries.

The Law on the Employment of Foreigners<sup>72</sup> is based on the principle of equal treatment. This implies that a foreigner employed in the Republic of Serbia in accordance with this Law has the same rights and obligations in terms of work, employment and self-employment as domestic citizens, if the conditions set out in the law are met.

We particularly emphasize the horizontal connection between the Law on Foreigners<sup>73</sup> and the Law on the Employment of Foreigners in terms of the provisions defining a single permit for temporary residence and work of a foreigner.

This liberal approach to bringing in foreign labour, on the one hand, and increased responsibility of the inviter and stricter penal policy, on the other, have a positive impact on the prevention of human trafficking.

**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?**

The 2009 Law on Amendments to the Criminal Code,<sup>74</sup> in accordance with Article 19 of the CoE Convention on Action against Trafficking in Human Beings, criminalizes the use of services of a victim of trafficking in human beings, insofar as (paragraph 8 of Article 388 of the Criminal Code) it stipulates that the criminal offence of trafficking in human beings is also committed by a person who knew or could have known that the victim was a victim of trafficking in human beings, and exploits her position or enables another to exploit her position for the purpose of exploitation as provided for in the basic form of this criminal offence. A more serious form of this criminal offence exists if it is committed against a minor (paragraph 9 of Article 388 of the Criminal Code).

The prescribed sentence for paragraph 8 is from six months to five years, and for paragraph 9 from one to eight years (without the possibility of mitigation – Article 57, paragraph 2, of the Criminal Code).

In the described manner, the Criminal Code of the Republic of Serbia has been harmonised with the provision of Article 19 of the Council of Europe Convention on Action against Trafficking in Human Beings, in terms of discouraging demand, by prescribing criminal liability for beneficiaries of services of victims of trafficking in human beings.

---

<sup>71</sup> <https://www.paragraf.rs/propisi/pravilnik-o-podnosenju-zahteva-za-izdavanje-viza-elektronskim-putem-i-odobravanju-viza.html>

<sup>72</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_zaposljavanju\\_stranaca.html](https://www.paragraf.rs/propisi/zakon_o_zaposljavanju_stranaca.html)

<sup>73</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_strancima.html](https://www.paragraf.rs/propisi/zakon_o_strancima.html)

<sup>74</sup> <https://www.paragraf.rs/propisi/krivicni-zakonik-2019.html>

Also, a significant change was introduced by the amendment to the 2016 Law on Misdemeanours,<sup>75</sup> so that in addition to engaging in prostitution, it also prescribed the punishment of beneficiaries of prostitution services, which the previous law did not provide for.

Criminalising the use of services by victims of human trafficking certainly discourages demand because, in addition to unequivocally indicating that such behaviour is socially unacceptable, it also creates a risk for beneficiaries of sexual services, who may be criminally and misdemeanourly prosecuted and punished for such actions, which can have a deterrent effect.

The Law on Employment and Unemployment Insurance<sup>76</sup> prescribes penal provisions for employment service providers (the National Employment Service and employment agencies) if they carry out employment services contrary to the provisions of this Law.

We also note that employment service providers are subject to supervision by competent authorities and inspections, depending on the subject of control, and are subject to both misdemeanour and criminal liability in their operations.

On 20 March 2024, the Government of the Republic of Serbia adopted the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024–2029, with the Action Plan for the period 2024–2026,<sup>77</sup> within which it was recognised that the prevention of human trafficking involves a whole series of activities that need to be implemented in order to reduce the impact of causes that contribute to the vulnerability of individuals and groups to human trafficking and discourage demand for products and services resulting from the exploitation of people.

### **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 legislation and practice of the Republic of Serbia are designed to ensure an individual assessment of protection needs at the border prior to any refusal of entry or expulsion, in accordance with international standards.

It also stipulates that no person shall be expelled or returned to a territory where his life or freedom would be threatened on account of his race, sex, language, religion, nationality, membership of a particular social group or political opinion. Before taking any decision to refuse entry or expulsion, the competent authorities are obliged to determine whether there are individual reasons why the person seeks international protection.

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

The Ministry of Sports, within its competence, implements measures that contribute to the prevention of human trafficking in the field of sports, especially when it comes to the protection of children and young athletes. Potentially vulnerable groups have been identified, such as underage athletes, athletes from socially and economically disadvantaged backgrounds, as well as athletes who come from abroad to participate in competitions, training sessions and sports camps. Measures include cooperation with competent state authorities and sports federations to prevent abuse and conduct checks when engaging persons working with children and youth in sports, integrating child protection standards into sports programmes and criteria for funding programmes of national sports federations, educating sports workers, coaches and officials about the obligation to report any form of abuse or suspicion of human

<sup>75</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_prekrsajima.html](https://www.paragraf.rs/propisi/zakon_o_prekrsajima.html)

<sup>76</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_zaposljavanju\\_i\\_osiguranju\\_za\\_slucuj\\_nezaposlenosti.html](https://www.paragraf.rs/propisi/zakon_o_zaposljavanju_i_osiguranju_za_slucuj_nezaposlenosti.html)

<sup>77</sup> [http://demo.paragraf.rs/demo/combined/Old/t/2024\\_03/SG\\_025\\_2024\\_001.htm](http://demo.paragraf.rs/demo/combined/Old/t/2024_03/SG_025_2024_001.htm)

trafficking to the competent authorities, promoting a safe and ethical environment in sports through public campaigns and seminars, in cooperation with sports organisations.

**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?**

Investigating human trafficking through the misuse of internet technologies during the reporting period, using appropriate digital tools or through data exchange with relevant partner services in the region, and primarily through work in operational working groups under the auspices of EUROPOL, online practices that may increase the risk of a person becoming a victim of human trafficking, “uncritical” behaviour on the Internet that may increase vulnerability and risks, especially among young people, were observed, such as:

- Excessive sharing of personal data (location, contacts, family circumstances, financial situation),
- Accepting unknown contacts on social networks or dating apps,
- Clicking on suspicious job or study abroad ads without checking the reliability of the provider,
- Accepting overly tempting offers (e.g., high income for unskilled work, travel expenses covered),
- Sending private photos or videos that can later be used for blackmail,
- Participation in online competitions, castings or “modelling offers” without verification by the organiser,
- Communication via encrypted applications (WhatsApp, Telegram),
- Ignoring warnings and security measures on the internet.

In order to reduce this risk, mechanisms have been developed globally that include international and national legal frameworks, various technological solutions as preventive and educational measures.

Preventive mechanisms used in the Republic of Serbia are:

- Institutional cooperation between the prosecutor’s office and the police with providers and platforms for the purpose of rapid action,
- Education of young people, parents and teachers through campaigns with relevant institutions and civil society organisations,
- Continuous monitoring and analysis of online content in cooperation with domestic and international partners.

The practical effect of their implementation is reflected in increased awareness and recognition of risks – internet beneficiaries are more often able to recognize fake profiles and suspicious ads.

In accordance with the Law on the Organisation and Competence of State Authorities for Combating High-Tech Crime,<sup>78</sup> state authorities participate in removing suspicious content from the Internet for the purpose of prevention.

At the national level, the “I Protect You”<sup>79</sup> platform has been developed to prevent the misuse of information and communication technologies.

The National Platform for the Prevention of Violence Involving Children “I Protect You” was established by the Government of the Republic of Serbia in 2021, when it began operating. In October

<sup>78</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_organizaciji\\_i\\_nadleznosti\\_drzavnih\\_organ\\_a\\_za\\_borbu\\_protiv\\_visokotehnoloskog\\_kriminala.html](https://www.paragraf.rs/propisi/zakon_o_organizaciji_i_nadleznosti_drzavnih_organ_a_za_borbu_protiv_visokotehnoloskog_kriminala.html)

<sup>79</sup> <https://cuvamte.gov.rs/>

of the same year, the Protocol on the Provision of Inter-Sectoral Services through the “I Protect You” Software Solution for the Protection of Children from Abuse, Neglect, Violence and Exploitation (updated in 2023) was adopted, which was signed by seven ministries (Ministry of Labour, Employment, Veteran and Social Affairs, Ministry of Family Care and Demography, Ministry of Education, Ministry of the Interior, Ministry of Health, Ministry of Justice and Ministry of Information and Telecommunications), the Supreme Public Prosecutor’s Office and the Office for Information Technologies and Electronic Governance.

The platform contains four components related to: 1) Information (what is violence, types of violence, recognition and action in accordance with laws and special protocols of the competent ministries), 2) Education (free online training for students, employees and parents), 3) Current Affairs (informal articles on topics related to violence) and 4) Contacts for citizens (software system for electronic reporting of violence that can be used free of charge by children, citizens and competent state bodies and institutions).

We would like to note that the national platform “I Protect You” aims to coordinate and strengthen intersectoral cooperation between all competent institutions in the fight against all forms of violence involving children.

The Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2029, or the Action Plan for the Implementation of the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2026, provides for a measure related to improving the prevention of child trafficking, with an emphasis on the misuse of communication and information technologies.

The misuse of various internet platforms and social networks is often used to recruit and exploit victims. People are most often recruited through false job advertisements or by courting through various means of online communication. Most often in cases of sexual exploitation, social networks are used, but also advertising websites, to promote services. This method of recruitment was observed in 25% of cases in 2022, in 39% in 2023, and in 49% in 2024. It is also used in a large percentage of cases when recruiting for labour exploitation, as well as forced marriage.

**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?**

The National Platform for the Prevention of Violence Involving Children “I Protect You”, launched by the Government of the Republic of Serbia, and with the support of the Office for Information Technology and e-Government, in October 2024 published the training “Human Trafficking – Prevention, Recognition, Reporting and Support” dedicated to this very problem. The training is intended for upper elementary school students, as well as high school students and is available in online format on the “I Protect You” platform. It is designed to cover all key aspects that help to understand and recognize situations of potential risk and react accordingly:

- Prevention: Students can learn how to protect themselves, especially in the virtual world, where the number of cases of recruitment via social networks and the Internet has increased.
- Recognition: The training provides them with knowledge about typical patterns of behaviour and situations that may indicate human trafficking. The emphasis here is on recognising unusual changes in behaviour in peers and themselves.

- Reporting: The “I Protect You” platform has a reporting section of the platform that, in just 10 steps, provides the ability to report any form of violence involving minors.
- Support: In addition to reporting, it is important to provide support to victims and young people going through these situations. This part of the training focuses on building empathy and support within the school community.

In addition to training, the platform also provides informative texts on this topic, intended for students, parents, and employees in educational institutions throughout Serbia.

It is important to note that the reporting segment of the platform allows anyone to anonymously file a report of human trafficking when the victim of trafficking is a minor. This enables a rapid response to prevent violence. Each report is immediately recorded in the software solution, which is set up so that all relevant institutions, such as the Centre for the Protection of Victims of Human Trafficking, the Ministry of the Interior, the Department for High-Tech Crime, social work centres and prosecutors’ offices, can be involved in the process upon receipt of the report.

Also, any child who is in trouble or feels threatened can send an SMS notification to trusted contacts via the mobile application. Behind the scenes of the platform are expert teams that analyse each report, ensuring a quick and adequate response from the competent authorities.

In November 2024, as part of the Western Balkans Public Administration Awards, a regional competition for the most significant innovations in public administration organised by ReSPA and SIGMA-OECD, the Office for Information Technology and e-Services received a special recognition in innovation and digital transformation of public services, while one of the awarded innovations was the National Platform for the Prevention of Violence Involving Children – “I Protect You”.<sup>80</sup> **This Office was awarded a special award for leadership in digital transformation and innovation in public service delivery, while the “I Protect You” platform received an award for outstanding human contribution to digital transformation.**

Thanks to the integration of 7 state bodies, the connection of over 2,700 institutions and more than 118,000 active beneficiaries, the platform has been recognised as a pioneering solution that contributes to rapid response and the safety of children throughout the Republic of Serbia. This award is a confirmation of the efforts of all beneficiaries and partners of the platform and an additional motivation for the entire society to continue to improve the system of prevention, support and protection from all forms of violence involving children.

The role of the education system is reflected in the creation and implementation of training for employees in the education system to improve their digital competencies and empower them to implement preventive activities with students and parents to raise awareness of all risks and challenges that exist in the digital space and methods of protection, but also about ways to constructively use information and communication technologies in education. Activities that the Ministry of Education implemented during the reporting period to improve the competencies of employees and raise the awareness of parents and children about challenges in the digital space, but also about the safe and constructive use of digital tools are listed under question number 2. under b).

During 2022, the then Ministry of Culture and Information supported the implementation of two projects on the topic of “Fighting Human Trafficking” at the Competition for Co-financing Media Content Production Projects for Televisions, namely:

---

<sup>80</sup> More details are provided in the answer to question number 15 and available at the link: <https://cuvamte.gov.rs/vest/platforma-cuvam-te-dobila-medjunarodnu-nagradu-kao-jedna-od-najznacajnijih-inovacija-u-javnoj-upravi/5131.php>



1. “Children and Begging as a Form of Human Trafficking” submitted by Lokal Media Plan from Novi Pazar, for whose implementation RSD 700,000.00 was approved. As part of the project, 4 half-hour TV shows were realised on the topic of the concept of child begging, begging as a form of human trafficking, the prevalence of child begging and child begging in Novi Pazar. The content was broadcast, in its premiere and rerun, on Novi Pazar Television once a week in the period from 25 November to 16 December 2022.
2. “Non(Modern) Slavery”, submitted by the Novinsko izdavačko društvo (Journalistic Publishing Company) Romano Nevipe DOO Beograd (Rakovica), for the implementation of which RSD 700,000.00 was approved. The applicant did not, in accordance with the contractual obligation, submit to the Ministry of Culture and Information a report on the implemented activities or the produced media content.

The 2022 competition for the improvement of professional and ethical standards in the field of public information also supported the implementation of the project “Chapter VII of the Serbian Journalists’ Code guarantees respect for the privacy, dignity and integrity of people reported on”, submitted by the Press Council. RSD 800,000.00 was approved for the implementation of the project.

In the public information competitions in 2023, the Ministry of Information and Telecommunications supported three projects, in the amount of RSD 2,000,000.00, on the topic of prevention and fight against human trafficking. The following projects were supported:

1. Radio Television Vranje d.o.o. Vranje, with the project “Don’t look away – human smuggling is all around us”. RSD 900,000.00 was allocated for the implementation of the project. The theme of the project is the fight against human smuggling and trafficking.
2. Radio Rubin d.o.o. Kruševac, with the project “Together against human trafficking!” RSD 500,000.00 was allocated for the implementation of the project. The theme of the project is education and increasing awareness of the general public about human trafficking.
3. Citizens’ Association Be Active 16 (*Budi aktivan 16*), with the project “Others’ Problems Concern Us”. RSD 600,000.00 was allocated for the implementation of the project. The topic of the project is human trafficking in Preševo, Bujanovac and Medveđa.

During 2024, the Ministry of Information and Telecommunications supported three projects, namely:

1. “Smuggling of migrants” in the amount of RSD 550,000.00, submitted by Radio-television Bujanovac d.o.o. The topic of the project is the fight against smuggling and human trafficking;
1. “Fighting Human Trafficking” by the applicant RTV M DOO Knjaževac, which was supported with the amount of RSD 600,000.00. The topic of the project is human trafficking;
2. “Give me something small, will I get beaten?” in the amount of RSD 500,000.00 submitted by the Local Media Plan, which aims to detect and prevent begging as a form of human trafficking in Novi Pazar.

The Ministry of Information and Telecommunications, during 2025, supported the project of the Centre for Information and Development of Surdulica CIRS, entitled “Human Trafficking in the Pčinj District”, through project co-financing, with the amount of RSD 600,000.00. The topic of the project is informing the public about human trafficking in the Pčinja District, where, in addition to official border crossings, there are over 50 illegal crossings, and there is also the point of contact between North Macedonia and the Republic of Serbia as a very critical one, very suitable for smuggling of both people and goods.

As part of the project “Together and Safely Through Childhood”, which is being implemented in cooperation by the Ministry of the Interior, the Ministry of Education, the Commissioner for the Protection of Equality, the Forensic and Police University in Belgrade, the Network of Women in the

Police, with the support of the Traffic Safety Agency, the OSCE Mission, the Caritas Association and the children's choir "Čarolija", workshops are being implemented with students based on an interactive work concept, using mobile phones and digital platforms for learning and competition in an interesting and creative way, role-playing, teamwork and practical training in the rules of safe behaviour in real and digital environments.

In order to develop a safety culture among students in the real and virtual world, to recognize forms of violence, abuse and discrimination, and to develop protection mechanisms, a workshop on the topic "Prevention of Peer Violence in the Real and Digital Environment" is being implemented with students from fifth to eighth grades, with a special focus on safe gaming and safe graduation celebrations. In the 2023/2024 and 2024/2025 school years, 19,862 workshops were held for approximately 218,000 students from fifth to eighth grades. A total of 1,097,600 copies of promotional informational and educational material were distributed to students (537,600 book and notebook stickers, 60,000 badges, 500,000 stickers).

Also, starting from the 2024/2025 school year, a workshop "Prevention and mechanisms for protecting children from abuse on the Internet and social networks" is being implemented for parents, which aims to educate parents on mechanisms for protecting children from abuse using digital technologies. In order to encourage parents to participate in the project in as many numbers as possible, 35 workshops on this topic were held in 17 police departments, for 2,180 parents and 146 school representatives.

As part of the project "Empowering Youth and Police Representatives in the Field of Juvenile Crime Prevention", an interactive workshop "It is My Right to Know My Rights and Obligations" was created, during the implementation of which from 2021 to 2024, 211 youth representatives from 22 secondary schools and nine high schools from Belgrade, Novi Sad, Subotica, Niš, Kragujevac and Novi Pazar were trained to organize workshops in their schools for their peers and further transfer the acquired knowledge as peer educators. 31 school representatives also participated in the trainings together with the students.

Based on the Regulation on the Safety and Protection of Children in the Use of Information and Communication Technologies,<sup>81</sup> the National Contact Centre for Child Safety on the Internet was established, which represents a single place for providing advice regarding child safety on the Internet, as well as forwarding reports of harmful, inappropriate or illegal content and behaviour on the Internet. Citizens are enabled to report harassment, online sexual abuse, suspicion of human trafficking and other forms of digital violence to the National Contact Centre for Child Safety on the Internet via the toll-free number 19833, email and on the "Smart and Safe" platform, or to receive advice on safe behaviour on the Internet. The National Contact Centre for Child Online Safety registered a total of 22,225 communications (calls, emails and messages via social networks) during the reporting period, based on which 3,736 cases were created, of which 3,473 were advisory in nature, and 263 were forwarded to the Ministry of Interior for further action.

As a form of preventive action, experts from the National Contact Centre for Child Safety on the Internet regularly create and publish educational content on the website [www.pametnoibezbedno.gov.rs](http://www.pametnoibezbedno.gov.rs) and social networks about the dangers lurking on the Internet (recruitment by predators, recruitment through false job advertisements, scholarships, etc.), while at the same time informing children and parents about protective measures.

---

<sup>81</sup> <http://demo.paragraf.rs/WebParagrafDemo/?did=335776>

In 2022, the Government of the Republic of Serbia adopted a Conclusion on the adoption of the General Protocol for the Protection of Children from Violence in Serbia,<sup>82</sup> which for the first time contains a definition of child labour and child begging. According to this protocol, “child labour abuse is work by a child that is mentally, psychologically, socially and morally dangerous and harmful to the child and that affects the child’s education by preventing the child from attending school, obliging the child to leave education early, or forcing the child to attend school under extremely difficult conditions, including the worst forms of child labour according to the International Labour Organisation Convention No. 182”.

In accordance with the obligation to adopt new special protocols aligned with the General Protocol in all relevant areas, a new Special Protocol for the Protection of Children from Violence in the Field of Social Protection was adopted in October 2024.<sup>83</sup> This protocol was distributed to all social work centres and all service providers working with children with an order for further action in accordance with Carolina Special Protocol for the Protection of Children from Violence in the Field of Social Protection regulates activities, procedures and other issues for the prevention and protection from violence of children who use the rights or services of social protection in the social work centre, other social protection institutions, foster families and other providers of social protection services, as well as the roles of the ministry responsible for social protection, i.e., family care, the social protection institute and the Social Protection Chamber (hereinafter referred to as: participants in social protection).

The Centre for the Protection of Victims of Human Trafficking, with the support of the International Organisation for Migration, conducted an online campaign on Instagram with the aim of preventing human trafficking in the migrant population. The campaign created informational materials that were shared using tools that allow targeting the migrant population in Serbia. The campaign was implemented in April 2024 and achieved a total reach of 97,796 and 345,924 impressions.

The social protection system has also been operating for many years with the national children’s SOS line – NADEL – 116 111, which, in addition to the advisory telephone line for children, has also developed a confidential and anonymous chat for children and young people who prefer written communication, i.e., a new online service for correspondence with professional associates. The new service “Secure CHAT”<sup>84</sup> is available on the website [www.116111.rs](http://www.116111.rs) (also available via Facebook, Instagram and Viber) and is available every day from 6 p.m. to 10 p.m. “CHAT counselling” is a service available to children and young people from the Serbian diaspora around the world who also occasionally contact the service to find out what the service is about or to get advice on a specific topic. These young people are also reached out to through written communication in English.

The SOS line for children is available 365 days a year, 24 hours a day. A significant number of calls relate to violence, mostly peer violence, but also family violence, digital violence and others. We would like to point out that the NADEL telephone counselling service was also called by adults (about 4% of all calls), and that the topics in the field of violence (family and peer violence), family relationships, communication with children about divorce, topics of depression, loneliness, self-harm by children dominated. Parents asked for information about the availability of institutions and services,

<sup>82</sup> <http://localhost/Ministarstvo/wp-content/uploads/2022/02/Opsti-protokol-za-zastitu-dece-od-nasilja.pdf>

<sup>83</sup> <https://www.minrzs.gov.rs/sites/default/files/2024-10/D0%9F%D0%BE%D1%81%D0%B5%D0%B1%D0%BD%D0%B8%20%D0%BF%D1%80%D0%BE%D1%82%D0%BE%D0%BA%D0%BE%D0%BB%20%D0%B7%D0%B0%20%D0%B7%D0%B0%D1%88%D1%82%D0%B8%D1%82%D1%83%20%D0%B4%D0%B5%D1%86%D0%B5%20%D0%BE%D0%B4%20%D0%BD%D0%B0%D1%81%D0%B8%D1%99%D0%B0%20%D1%83%20%D0%BE%D0%B1%D0%BB%D0%B0%D1%81%D1%82%D0%B8%20%D1%81%D0%BE%D1%86%D0%B8%D1%98%D0%B0%D0%BB%D0%BD%D0%B5%20%D0%B7%D0%B0%D1%88%D1%82%D0%B8%D1%82%D0%B5.pdf>

<sup>84</sup> [www.116111.rs](http://www.116111.rs)

how to report and process violence. NADEL's experts are educated professionals with many years of experience in working with children, which is also significant.

As part of the transformation of the Centre for the Protection of Infants, Children and Youth, new telephone counselling services are being developed, such as the "Parent's Phone" with the support of UNICEF, which provides a telephone counselling service to parents and caregivers, 6 hours a day (from 4 p.m. to 10 p.m.), 7 days a week, and has so far received around 10,000 calls from parents and adults concerned about their children. After a three-year piloting of the service, a Training Programme for Telephone Counselling for Parents was created and accredited.

Currently, work is underway to develop "Online Counselling for Children and Youth" as an innovative service that is going through a preparatory phase, again with the support of UNICEF. The initiative to enable online counselling conversations (via the ZOOM platform) arose from the work of NADEL during the COVID pandemic, but also from numerous foreign and domestic studies indicating a large increase in the number of young people facing mental difficulties. This service is intended for young people who need more intensive counselling support, and who, for various reasons, do not have access to resources, primarily the health system.

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

The Ministry of the Interior of the Republic of Serbia, Technical Directorate, High-Tech Crime Service actively participates in the prevention and suppression of all forms of abuse of information and communication technologies that may be related to human trafficking. In this context, close and continuous cooperation is being achieved with ICT companies and internet service providers, including hosting providers and social networks, both in the country and abroad.

Cooperation takes place through:

- joint activities on the identification and collection of electronic evidence;
- participation and cooperation in international platforms to combat online abuse;
- rapid data exchange to remove or block illegal content
- preventive activities and education aimed at greater safety of Internet users.

In this way, in cooperation with the ICT sector, it contributes to a broader system of protection, prevention and timely detection of phenomena that may be related to human trafficking and related crimes.

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

The advocacy group of women with experience of human trafficking, with the support of the Citizens' Association for the Fight against Human Trafficking and All Forms of Gender-Based Violence "ATINA", is aware of the fact that a Draft Law on the Prevention and Suppression of Human Trafficking in the Republic of Serbia has been drafted.

When planning activities, the Centre for the Protection of Victims of Human Trafficking takes into account the experiences of previous service users of persons with human trafficking experience and contemporary trends in this area.

Through annual reports, the Centre for the Protection of Victims of Human Trafficking reviews the current situation, based on which an assessment is made to develop a work plan for each subsequent year.

In 2024, the Centre for the Protection of Victims of Human Trafficking adopted a new Rulebook on the Identification of Victims of Human Trafficking and Coordination of Protection. Upon adoption of the Rulebook, the Centre conducted a survey in which representatives of the prosecutor's office, the Ministry of the Interior, social protection institutions, non-governmental organisations, ombudsmen, and survivors of human trafficking participated.

## **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 Centre for the Protection of Victims of Human Trafficking provided services to LGBTI+ persons during the reporting period. There were no reports of misconduct by police officers towards this category of persons.

In 2024, employees of the Centre for the Protection of Victims of Human Trafficking attended training on the topic "Strengthening the Capacity of Service Providers and Decision-Makers from State Institutions of the Republic of Serbia Regarding the Position of LGBTI+ Refugees, Asylum Seekers and Persons on the Move", which provided them with competencies for a particularly sensitive approach in working with persons from the LGBTI+ population.

### **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?**

Measures for the identification and protection of migrant workers, including those in an irregular situation, include cooperation between national institutions, civil society organisations and other relevant actors, which can contribute to improving the identification and protection of potential victims of trafficking in human beings, as well as to ensuring their rights, support and adequate protection.

In accordance with the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2029 and the Action Plan for the Implementation of the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2026, activities are planned related to strengthening the response to the problem of human trafficking for the purpose of labour exploitation through the active involvement of inspectorates, the National Employment Service, employers, trade unions and workers in multi-sector training. Among other things, during 2024, 5 contact persons were appointed in the Labour Inspectorate, in Belgrade, Niš, Novi Sad and Kragujevac, to act in cases of suspicion of human trafficking for the purpose of labour exploitation. During 2025, training was held for employees of the Serbian Chamber of Commerce, the Employers' Union and the Confederation of Independent Trade Unions of Serbia on the topic of preventing human trafficking for the purpose of labour exploitation.

The Ministry of the Interior, in accordance with the Action Plan for the Implementation of the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2026, has launched an initiative to form an Employers' Network for Combating Human Trafficking for the Purpose of Labour Exploitation, which will consist of representatives of the Serbian Chamber of Commerce, the Confederation of Independent Trade Unions of Serbia, and the Employers' Union of Serbia.

In May 2023, the Minister of the Interior issued an amendment to the 2021 Instructions on the Procedure for Employees of the Ministry of the Interior in Cases of Human Trafficking, which further regulates the procedure for employees of the Ministry of the Interior when, in the course of their duties, using the Indicators for Preliminary Identification of Victims of Human Trafficking, they become aware of victims and perpetrators of the criminal offence of Human Trafficking under Article 388 of the Criminal Code.<sup>85</sup> The annex to the Instructions contains the Indicators for Preliminary Identification of Victims of Human Trafficking for the Police and an Information Brochure for Persons with Experience of Human Trafficking. The information brochure contains information on the rights and available types of support for victims of human trafficking in Serbian, English, Albanian, Arabic, Bulgarian, Farsi, Urdu, French, Hungarian, Macedonian, Romani, Turkish, Chinese and Romanian. The aforementioned manual with attachments is available to all employees of the Ministry of the Interior.

The Commissariat for Refugees and Migration cooperate with specialised civil society organisations, as well as with international institutions, in order to improve the identification and protection of victims of human trafficking. In the period from 2023 to 31 July 2025, 127 employees of the Commissariat for Refugees and Migration attended training in the field of human trafficking, of which 93 attended training organised by the Centre for the Protection of Victims of Human Trafficking, and all employees of the centres attended basic training, which, in addition to acting in accordance with mandatory procedures, also includes familiarisation with the cultural specificities of countries of origin and harmful customs such as child marriage, child exploitation, etc.

The Responsible Business Hub<sup>86</sup> of the Serbian Chamber of Commerce and the civil society organisation Belgrade Centre for Human Rights created the training "Employment and Integration of Foreign Workers" and during April and May 2025, two trainings were held, attended by over 50 company representatives. The training was prepared based on a survey and interviews conducted by the Belgrade Centre for Human Rights on this topic with companies. The goal of the training is to provide practical knowledge and solutions in the following areas:

- Legal and administrative aspects of employing foreign workers;
- Exchange of good practices and experiences with other employers;
- Integration of foreign workers into the work environment and society.

The Centre for the Protection of Victims of Human Trafficking, through the Regulation on the Identification and Coordination of the Protection of Victims of Human Trafficking, has introduced a special level of urgency in responding to cases of suspicion that persons from the migrant population are victims of human trafficking, which implies an urgent response, without delay. The Centre for the Protection of Victims of Human Trafficking has developed special material for informing persons from the migrant population in common languages, such as Arabic, Ukrainian and others. Also, in 2025, the Centre for the Protection of Victims of Human Trafficking signed a Memorandum of Cooperation with

---

<sup>85</sup> <https://www.paragraf.rs/propisi/krivicni-zakonik-2019.html>

<sup>86</sup> <https://responsiblebusinesshub.pks.rs/en/what-is-rbh/>

the Commissariat for Refugees and Migration of the Republic of Serbia, which stipulates intensive cooperation in the protection of migrants from human trafficking.

The Centre for the Protection of Victims of Human Trafficking, as a social protection institution responsible for the formal identification of victims of human trafficking, cooperates with the civil society organisations ASTRA and citizens' association Atina, with which it has signed memorandums of cooperation, as well as with the following civil society organisations: IDEAS, Belgrade Centre for Human Rights, Caritas, Info Park, JRS, Church World Service, Centre for Crisis Policy and Response, Centre for the Protection of Asylum Seekers. The Centre for the Protection of Victims of Human Trafficking has also established special cooperation with UNHCR, whose employees were trained in recognising cases of human trafficking during 2023 and 2024.

The above activities have led to an increase in the detection of cases of suspected human trafficking among the migrant population.

During the reporting period, during 2022 and 2023, six foreign nationals were identified as victims of human trafficking, in 2024, 16 persons were identified, while in the first half of 2025, 15 foreign nationals were identified as victims of human trafficking.

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

Through all promotional activities, professional gatherings, media appearances, internet presentations and campaigns conducted in the Republic of Serbia, victims are encouraged to seek help.

In 2021, the Ministry of the Interior established a toll-free national hotline for reporting suspicions of human trafficking (0800 100 388). The hotline was established in the premises of the Command and Operations Centre of the Ministry of the Interior, which is staffed by trained police officers.

The Centre for the Protection of Victims of Human Trafficking has an established telephone line that is available 24 hours a day, as well as a system of on-call professionals.

In addition to the national SOS line for support to women who have experienced violence established by the Republic of Serbia, under the auspices of the Ministry of Labour, Employment, Veteran and Social Affairs and financed from the republican budget, 9 more service providers have been licensed. SOS telephones for women victims of violence are financed from local budgets or from donor funds. The license for the provision of social protection services is issued by the Ministry of Labour, Employment, Veteran and Social Affairs in accordance with the Law on Social Protection and the Regulation on the conditions and standards for the provision of social protection services. The list of all licensed service providers can be found on the official website of the Ministry of Labour, Employment, Veteran and Social Affairs.<sup>87</sup>

The SOS telephone service can also be established with the support provided by earmarked transfers from the Republic's budget to support the establishment and development of licensed services in those local government units that are below the republic's level of development. For these purposes, the state has planned a total of RSD 560 million (about EUR 5 million) for 2025 for various services (among others, these may include SOS telephone services, shelters for victims of violence, etc.).

---

<sup>87</sup> [https://www.minrzs.gov.rs/sites/default/files/inline-images/rsz\\_reg\\_briga.jpg](https://www.minrzs.gov.rs/sites/default/files/inline-images/rsz_reg_briga.jpg)

In the centres managed by the Commissariat for Refugees and Migration, specialised civil society organisations and international organisations, in cooperation with the Commissariat, continuously conduct empowerment and information workshops where beneficiaries are informed about the risks in the field of human trafficking, the identification of potential victims, and the method of reporting and the protection provided to them. The beneficiaries are also provided with informational material for reporting, as well as prominent phone numbers and email addresses on the bulletin boards in the centres.

**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?**

The Ministry of the Interior, Border Police Directorate, takes measures to identify and refer potential victims of human trafficking at border crossings. Also, legally prescribed measures are taken in terms of prevention, deterrence, detection and prosecution of perpetrators of criminal acts related to the subject matter. Border police officers regularly undergo training in recognising indicators of human trafficking. In cases of suspicion that a person is a potential victim of human trafficking, the border police inform the competent institutions, primarily the Centre for the Protection of Victims of Human Trafficking, for further assessment and provision of adequate assistance. Special focus is placed on vulnerable categories, such as unaccompanied children, women and persons without accompanying documentation.

During the asylum procedure, the specific situation of persons who need special procedural or reception guarantees is taken into account, which, among others, includes victims of human trafficking.

When officers of the Asylum Office, during the official process of submitting an asylum application and/or interviewing an asylum seeker, suspect that the person is a potential victim of human trafficking, based on a vulnerability assessment, which includes questions about possible experience of coercion, sexual exploitation, forced labour or other forms of human trafficking, they inform the Centre for the Protection of Victims of Human Trafficking.

Indicators that help identify victims among asylum seekers include, for example, persons who have travelled under surveillance, who do not know where they are, who show signs of trauma, which overall signals the need for additional protection. Indicators for the preliminary identification of victims of trafficking in human beings are an integral part of the Standard Operating Procedures for Handling Victims of Trafficking in Human Beings, as well as the Instructions on the Procedure for Employees of the Ministry of the Interior in Cases of Trafficking in Human Beings.

Victims of human trafficking have the right to priority processing of the asylum procedure, to submit asylum applications and be interviewed by officials, and with the assistance of an interpreter of the same sex, to receive psychological support during the procedure, as well as to avoid re-traumatisation.

When deciding on an asylum request from a victim of human trafficking, an assessment is made as to whether a possible return to the person's country of origin would pose a risk of torture, inhuman or degrading treatment or re-victimisation, after which a decision is made based on the relevant facts, evidence and circumstances of the specific case.

If a person does not meet the conditions for granting refugee status or subsidiary protection, the competent authority for the identification and coordination of the protection of victims of trafficking



in human beings informs them about the conditions for granting temporary residence and the rights that persons with that status exercise.

According to the Law on Foreigners,<sup>88</sup> a victim of human trafficking is granted temporary residence if the competent authority for the identification and coordination of the protection of victims of human trafficking considers that his/her stay is necessary for the purpose of his/her protection, recovery and ensuring safety, or if the court, prosecutor's office or police consider that his/her presence is necessary for the purpose of cooperation in criminal proceedings. This person has the right to safe accommodation, psychological and material assistance, access to emergency medical care, access to education (for minors), the right to advice and information on the rights available to him/her, in a language he/she understands, the right to access the labour market, vocational training and education.

A person whose asylum application has been rejected by a final decision, and who has no other basis for residence in the Republic of Serbia, is given the opportunity to voluntarily return through the international organisations IOM or UNHCR.

The Commissariat for Refugees and Migration implements voluntary return programmes for foreigners whose asylum application has been rejected or dismissed by a decision of the competent authority or if the asylum procedure has been suspended, foreigners who have been granted temporary protection, foreigners who have had a decision made to terminate temporary protection; persons whose asylum application has been officially revoked by the Asylum Office or annulled such a decision; and foreigners whose right to asylum has ceased.

IOM facilitates voluntary return as part of the AVRR (Assisted Voluntary Return and Reintegration) Programme, which includes the following segments: informed decision-making about return, organisation of safe transport, as well as assistance in reintegration in the country of origin (e.g., training, employment assistance, etc.).

In order to inform persons about the right to assisted voluntary return, information sessions on the voluntary return procedure have been continuously conducted on a weekly basis in the centres managed by the Commissariat for Refugees and Immigration since 2023, and 485 group info sessions have been held so far. The Commissariat's employees who are trained to inform beneficiaries about voluntary return have also completed training in the field of identifying and protecting victims of human trafficking. If necessary, individual counselling for voluntary return is also conducted in cooperation with the International Organisation for Migration, and any suspicion of human trafficking is reported in accordance with standard operating procedures. For presumed or identified victims, a voluntary return programme to the country of origin is organised in cooperation with the Centre for the Protection of Victims of Human Trafficking, and victims of human trafficking are recognised in the inter-institutional Standard Operating Procedures for Conducting Voluntary Return Programmes to the Country of Origin, which are currently being developed.

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

In accordance with the Law on Asylum and Temporary Protection<sup>89</sup>, the Commissariat for Refugees and Migration is continuously working on the identification of persons who are provided with reception guarantees. By the mandatory instruction of the Commissioner for Procedures in Asylum

---

<sup>88</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_strancima.html](https://www.paragraf.rs/propisi/zakon_o_strancima.html)

<sup>89</sup> <https://www.paragraf.rs/propisi/zakon-o-azilu-i-privremenoj-zastiti.html>

Centres of 7 December 2023, and with the aim of standardised procedures, the application of the EU Asylum Agency (EUAA) for the identification of vulnerable categories is applied in the daily work of the centres. One of these categories is victims of human trafficking, so the application contains 47 indicators sensitive to victims of human trafficking (physical, psychological and environmental indicators). By mandatory instruction of the Commissioner for Procedures in Asylum Centres, when accepting a person into asylum centres, a preliminary identification of vulnerability is carried out using this tool, and the results are an integral part of the personal file of each asylum seeker.

In order to improve the work of employees and respond more efficiently to suspected victims of human trafficking, the Commissariat for Refugees and Migration, with the support of the Centre for the Protection of Victims of Human Trafficking, has developed a shortened internal procedure for the actions of employees in the centres, including the address list of competent institutions and basic definitions and measures in the field of human trafficking, with information that must be provided to suspected victims.

Those employed by the Commissariat are continuously trained to recognize risks, identify potential victims and provide effective support and protection. In the period from 2022 to 31 July 2025, specialised training was held for 127 participants employed by the Commissariat. In the same period, 373 workshops were held for women and children with the aim of raising awareness and identifying potential victims. Specialised organisations in the field of human trafficking have unhindered access to the centres, and the Commissariat has signed a memorandum of cooperation with them.

In penal (prison) conditions, identifying a victim of human trafficking requires a careful, systematic and ethical approach, with the observational method being one of the key tools, supplemented by an analysis of the behaviour, communication and biographical data of convicted persons. Namely, there is no single sign by which one can draw a conclusion that a person is a victim, but a combination of emotional, physical, behavioural, social and psychological factors. Some of the most common signs are: emotional signs – may appear frightened, expressed fear, withdrawn, emotionally closed, passive, submissive, confused, emotional instability (constant mood swings), tearfulness, suicidal thoughts/attempts, anxiety, feelings of shame; physical indicators – physical injuries (bruises, welts), scars, traces of tying, muscle tension, trembling, psychosomatic symptoms; behavioural indicators – fear of speaking, excessive obedience, avoidance of eye contact, stereotyped responses, self-harm (cutting, hitting), overeating or loss of appetite, loss of interest in usual activities; social indicators: may show submissiveness, distrust of people, withdrawal from the outside world, isolation, control from other convicts; psychological reactions – possible PTSD reactions (nightmares, flashbacks, hypersensitivity to sound or touch), self-contempt, derealisation and depersonalisation, dissociation or emotional numbness, panic attacks, personality or identity disorder, presence of Stockholm syndrome, feeling that violence is “deserved, normal”. All these indications are a signal that requires further examination and a multidisciplinary response, so it is necessary to observe the entire behaviour and communication of convicted persons, with an understanding of the context in which they find themselves. A multidisciplinary team (special education teacher, psychologist, psychiatrist, doctor and social worker) conducts an interview, makes an assessment and initiates a protection and assistance plan. Namely, the following measures are taken:

- Legal assistance and administrative support
- Medical assistance and care
- Psychological and psychiatric support and assistance to help the victim overcome the trauma and integrate into society
- Protection of the victim’s privacy, safety of the victim and protection from intimidation; accommodation and structure of other prisoners are adjusted to make the victim feel safe and the goal is to avoid further and repeated victimisation

- Educational measures (explain to the victim the phenomenon of human trafficking, available protection and assistance measures)
- Education and training
- Cooperation with organisations and services providing support and assistance to victims (law enforcement agencies, non-governmental organisations dealing with the protection of victims of human trafficking, legal advisors, social institutions).

For the penal (prison) system, timely identification of the victim is crucial in order to prevent further or repeated victimisation, provide adequate protection, psychological support, and initiate the necessary legal and social mechanisms.

**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.

The Centre for the Protection of Victims of Human Trafficking develops an individual protection plan for each victim of human trafficking in accordance with the Regulation, taking into account particularly vulnerable categories.

All relevant stakeholders, such as social protection institutions, citizens' associations, health institutions, educational institutions, police and others, are involved in the provision of services, with the aim of creating a broad and functional support network for each victim. Each plan is developed in cooperation with the beneficiary.

The most common areas of work are:

- Safety of female beneficiaries, which includes activities of close cooperation with the police, their regular alerting and advisory work with female beneficiaries, along with the creation of safety strategies;
- The Centre provides various services and assistance in the context of access to justice, which includes a wide range of activities – hiring lawyers, preparing for testimony, requesting the status of a particularly sensitive witness, sending findings and opinions to prosecutors' offices and courts, with a detailed description and interpretation of the human trafficking situation, organising transportation and escorting victims when going to prosecutors' offices and courts.
- Health care, which includes assistance in exercising the right to health insurance, scheduling medical examinations and interventions, purchasing medications, organising transportation and accompanying people when going to the doctor;
- Support in overcoming trauma is provided through the advisory work of our professional workers, as well as through psychotherapy services, which are provided directly by the Centre or other organisations or institutions, most often specialised civil society organisations,
- Ensuring material security is mainly done through cooperation with other institutions that can provide various types of material support, such as social protection centres, the Red Cross or other humanitarian organisations;
- Accommodation is most often provided through placement in the Shelter of the Centre for the Protection of Victims of Human Trafficking or in other social protection institutions.

Most often, victims use the accommodation services of the Centre's Shelter, the supported housing service provided by the Atina association, and somewhat less often in safe houses, homes for children without parental care and foster families;

- Support for family functioning involves working with victims' families with the aim of helping their functioning, reintegrating the victim into the family, mobilising their capacities for the purpose of supporting the victim, strengthening the parental capacities of the victim or the capacities of the victim's parents, as well as improving partnership relationships;
- Providing guardianship protection is within the domain of guardianship authorities, with whom the Centre for the Protection of Victims of Human Trafficking cooperates closely and provides them with assistance and support, as well as coordinates their cooperation with other institutions and organisations. When the presumed or identified victim is a minor, the Centre for Social Work is required to be notified, with whom a plan for the protection of the beneficiary is developed.

The Centre for the Protection of Victims of Human Trafficking provides accommodation services for women and children who are victims of human trafficking. The process of establishing accommodation services for male victims of human trafficking is underway.

The Ministry of Labour, Employment, Veteran and Social Affairs, during 2024, provided technical equipment and furniture for equipping the screening room, which is particularly important, considering that the beneficiaries of the Shelter will be able to give statements in the premises of the Centre for the Protection of Victims of Human Trafficking, in conditions where they feel safe and secure with adequate psychological support from professional workers with whom they have a developed relationship of trust.

**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?**

Support for the reintegration of victims of human trafficking into the social protection system involves a series of measures and activities aimed at their recovery, empowerment and inclusion in society in a safe and dignified manner. The participation of the victim of human trafficking plays a particularly important role in this, as do other important elements that influence the creation of an individual protection plan. In creating a protection plan for a child, it is mandatory to involve the social work centre and the Centre for the Protection of Victims of Human Trafficking, in terms of ensuring, above all, safety, guardianship if necessary, placement in a biological, kinship or foster family, inclusion in the education system, provision of psychological, health and legal assistance, as well as supported housing if it is a younger person. If it is an adult, the Centre for the Protection of Victims of Human Trafficking also creates an individual protection plan with the participation of the user, including all relevant institutions, primarily the centre for social work, but also other institutions that can be of assistance in ensuring safety, material support, housing, employment, education, treatment, etc. The most important thing is to approach the reintegration process in a multi-sectoral manner, depending on the age and needs of the individual or family, if it is a mother with a child.

Reintegration support is also implemented through an individual protection plan, through the aspects described in the previous answer (question number 24).

The Centre for the Protection of Victims of Human Trafficking, in cooperation with the National Employment Service, provides support in the employment of victims of human trafficking, bearing in mind that victims of human trafficking fall into the category of those who are more difficult to employ. Victims of human trafficking have privileges in employment and self-employment programmes.

The Commissariat for Refugees and Migration is responsible for implementing activities aimed at the integration of persons granted asylum in the Republic of Serbia. All activities regarding potential and identified victims of human trafficking are implemented in coordination with the Centre for the Protection of Victims of Human Trafficking, and include Serbian language classes, classes on Serbian history, culture and constitutional order, housing assistance, one-time financial assistance, assistance in accessing the labour market, including programmes for acquiring knowledge as an aid in exercising all other legally guaranteed rights. The Integration Advisor of the Commissariat develops an individual integration plan for each person, which includes identifying needs and necessary support, and when it comes to presumed or identified victims, all support is coordinated with the Centre for the Protection of Victims of Human Trafficking.

The Commissariat for Refugees and Migration also provide support to local government units in the development of Local Action Plans, through which local governments determine the situation, problems and needs of different categories of migrants located on their territory. When reviewing existing and developing new local action plans, local government units have included victims of human trafficking as a special category for which a needs assessment should be conducted and measures developed.

In response to the public call of the Commissariat for Refugees and Migration for the allocation of funds for capacity building of local self-government units through the implementation of workshops, training, improvement of information and other activities of importance for the migrant population, three municipalities in which local teams for the fight against human trafficking operate, Kragujevac, Kikinda and Vranje, as well as the municipality of Šid, responded in 2024. The end beneficiaries are employees in local institutions (Kikinda), returnees after readmission (Kragujevac), beneficiaries of the asylum centre (Vranje) and migrants in transit (Šid). Each local self-government unit defines measures within its Local Action Plan to improve the reintegration of victims of human trafficking.

**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.**

The Law on Foreigners, which, among other things, regulates temporary residence for presumed victims of human trafficking (reflection period) in Article 62 and temporary residence for victims of human trafficking in Article 63, also provides for temporary residence for humanitarian reasons.

Temporary residence for humanitarian reasons, as prescribed by Article 61 of the Law on Foreigners,<sup>90</sup> may be granted to a foreigner for whom there are other circumstances that require special consideration, including in connection with serious and justified personal reasons of a humanitarian nature. It is granted for a period of at least six months and up to one year at most and may be extended if the circumstances on the basis of which the temporary residence was granted still exist.

We will cite the example of a Sri Lankan citizen who was issued a long-stay visa D, with which she exercised the right to employment with the inviting party, in accordance with the regulations governing the employment of foreigners. After less than a month, the inviting party deregistered her from the Central Register of Compulsory Social Insurance, as a result of which she was staying in the country contrary to the purpose, i.e., the basis for which she was issued a visa D. The competent authority granted her temporary residence on humanitarian grounds after it was determined that the circumstances of the submitted application regarding justified personal reasons of a humanitarian nature were well-founded.

---

<sup>90</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_strancima.html](https://www.paragraf.rs/propisi/zakon_o_strancima.html)

## **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 the Republic of Serbia, the protection of the identity of a child victim of human trafficking is ensured through coordinated activities of state institutions and civil society organisations, which, among other things, include limited disclosure of data to the public, specialised procedures within the Victims Protection Centre, but also through training for experts involved in child identification to prevent disclosure of information. The Victims Protection Centre is a key institution that coordinates assistance and support to victims, including children, ensuring that their data is not disclosed. The National Coordinator for Combating Human Trafficking works to harmonize activities and strategic goals, with the aim of better protecting victims, especially women and children.

Special provisions on the protection of minors as victims in criminal proceedings are contained in the Law on Juvenile Perpetrators of Criminal Offences and Criminal Protection of Minors.<sup>91</sup>

Among other things, it is stipulated that in proceedings for criminal offences committed against minors, the public prosecutor and the court shall make special efforts to avoid possible harmful consequences of the proceedings on the personality and development of the minor. In this regard, the examination of minors shall be carried out with the assistance of a psychologist, pedagogue or other professional, and the judge may order that the minor be examined using technical means for transmitting images and sound, without the presence of the parties and other participants in the proceedings, in the room where the witness is located, i.e., in an apartment or other room or institution professionally equipped for the examination of minors.

Also, one of the special reasons for excluding the public from the main hearing (the entire main hearing or a specific part), in accordance with the Code of Criminal Procedure,<sup>92</sup> is the protection of the interests of a minor who appears as an injured party or witness in criminal proceedings. In the case when the public is excluded from the main hearing, the presiding judge warns the persons attending the main hearing that they are obliged to keep as a secret everything they learned at that hearing and indicates that disclosing a secret constitutes a criminal offence.

In the social protection system, protecting the identity of a victim of human trafficking is an absolute priority and stems from laws, bylaws, and professional procedures that oblige professionals to act with the highest degree of confidentiality.

The measures implemented serve to protect the victim from secondary victimisation, stigmatisation, and security threats, and any misuse of data entails disciplinary and criminal liability.

According to the Law on Social Protection, social protection institutions and other providers of social protection services are obliged to keep beneficiary documentation and secure it from unauthorised access, duplication and misuse.

The Centre for the Protection of Victims of Human Trafficking complies with legal regulations regarding the protection of personal data.

---

<sup>91</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_maloletnim\\_uciniocima\\_kvivicnih\\_dela\\_i\\_kvivicnopravnoj\\_zastiti\\_maloletnih\\_lica.html](https://www.paragraf.rs/propisi/zakon_o_maloletnim_uciniocima_kvivicnih_dela_i_kvivicnopravnoj_zastiti_maloletnih_lica.html)

<sup>92</sup> [https://www.paragraf.rs/propisi/zakonik\\_o\\_kvivicnom\\_postupku.html](https://www.paragraf.rs/propisi/zakonik_o_kvivicnom_postupku.html)

The rules for providing support and assistance to victims and witnesses in criminal proceedings apply to the protection of child victims of human trafficking in court proceedings. Additionally, support applicable to minors is provided. In higher courts (taking into account the National Strategy for the Realisation of the Rights of Victims and Witnesses of Criminal Offences in the Republic of Serbia for the period 2020-2025 and the Action Plan for the period 2023-2025) Services for Support to Victims and Witnesses of Criminal Offences were established. The work of these Services is regulated by the Rules adopted by the High Judicial Council on 12 December 2024. The Rules on the Work and Procedures of the Service for Providing Support and Assistance to Victims and Witnesses and the Contact Point for Informing Victims and Witnesses,<sup>93</sup> among other things, prescribe the principle of confidentiality and the principle of privacy: Article 9 of these Rules stipulates that the provision of support and assistance by the Service for Support and Assistance and the Contact Point for Information is confidential.

Article 10 stipulates that when providing support and assistance, all measures shall be taken to protect data on victims and witnesses, their family members, their privacy, dignity and integrity, and personal characteristics taken into account during the assessment of individual needs for support and assistance measures, as well as all measures to prevent the identification of the injured child.

All information and data on the actions of the Support and Assistance Service and the Contact Point for Information shall be entered into a single database (hereinafter referred to as: electronic records) and through the appropriate case register (Article 30). However, access to this data is limited and provided only to the president of the court, the acting judge and an employee of the Support and Assistance Service and the Contact Point for Information.

Information and data from electronic records and case registers are stored and processed in accordance with the provisions of the Law on Personal Data Protection<sup>94</sup> (Article 31).

When it comes to publishing court decisions, it should be borne in mind that Article 7 of the Rulebook on the Replacement and Omission<sup>95</sup> (Pseudo-Analysis and Anonymisation) of Data in Court Decisions, adopted by the Supreme Court in 2016, as amended on 30 June 2020, stipulates that in criminal decisions, data on: the injured party as a prosecutor, private prosecutor, injured party, injured party on motion, witness, proxy (natural person), legal representative, relative, friend, neighbour of the party shall be pseudonymised and anonymised. The Rulebook on Replacement and Omission also stipulate the protection of personal data. It is specifically provided that in decisions in proceedings against juvenile perpetrators of criminal offences, in addition to the data referred to in Article 7 of these Rules, data on the juvenile perpetrator, the injured party, the time and place of the critical event shall be pseudonymised and anonymised. In decisions made in proceedings in which the public is excluded by law, in addition to the data referred to in Article 5 of these Rules, all data that are determined by law, other regulations and acts to be kept secret shall be pseudonymised and anonymised.

There are also a number of measures in place to protect the rights of minors in the field of media services. The Council of the Electronic Media Regulatory Body has adopted the Rulebook on the

---

<sup>93</sup> [http://demo.paragraf.rs/demo/combined/Old/t/2024\\_12/SG\\_104\\_2024\\_014.htm](http://demo.paragraf.rs/demo/combined/Old/t/2024_12/SG_104_2024_014.htm)

<sup>94</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_zastiti\\_podataka\\_o\\_licnosti.html](https://www.paragraf.rs/propisi/zakon_o_zastiti_podataka_o_licnosti.html)

<sup>95</sup> <https://www.vrh.sud.rs/sites/default/files/attachments/PRE%C4%8CI%C5%A0%C4%86EN%20TEKST-%20PRAVILNIK%20o%20zamenu%20i%20izostavljanju%20%28pseudonimizaciji%20i%20anonimizaciji%29%20podataka%20u%20sudskim%20odlukama.pdf>

Protection of the Rights of Minors in the Field of Media Services,<sup>96</sup> in accordance with which media service providers are obliged to act.

In accordance with Article 27 of the aforementioned Rulebook, the media service provider is obliged to protect the identity of a minor if there are indications that the minor is a perpetrator, witness or victim of violence, a criminal act or other punishable behaviour, or if he or she has attempted or committed suicide.

If there is a justified public interest in publishing an audio or audiovisual recording of the commission of violence, a criminal act or other punishable conduct in which a minor participated, the media service provider may publish such a recording while respecting the obligation referred to in paragraph 1 of this Article (e.g., blurred or masked image and modulated tone).

In the case referred to in paragraphs 1 and 2 of this Article, the media service provider is obliged to refrain from publishing data that directly reveals the identity of the minor (e.g., his name, the names of his parents or close relatives, residential address, etc.) and data that could indirectly indicate his identity, either independently or together with data that is already available to the public (e.g., the school he or she attends, his or her place of work, a personal description of the minor, his or her photograph or video, etc.).

The media service provider is obliged to protect the identity of a minor even when this has not been done by a public authority or another person, including another media publisher, whose announcement or statement it publishes or transmits in connection with the cases referred to in paragraphs 1 and 2 of this Article.

Also, in the event of a minor's disappearance, and in accordance with Article 3 of the Regulation on Urgent Public Notification of a Minor's Disappearance, the media service provider, upon receipt of the information sent by the Ministry, shall immediately publish (broadcast) a notification of the minor's disappearance. The media service provider shall publish (broadcast) the same for at least 20 seconds, in an unchanged form and with identical content as that in which it was delivered to it by the Ministry. The media service provider shall also publish (broadcast) this notification within the next 48 hours, and in the first eight hours from the moment of delivery of the notification every 30 minutes, and thereafter every 60 minutes. After the expiration of the 48-hour period from the first publication, the obligation to further publish the notice referred to in paragraph 1 of this Article shall cease.

Furthermore, upon receipt of information from the competent ministry that a missing minor has been found, the media service provider shall, without delay, cease publishing (broadcasting) the notification of the missing minor and before the expiry of the above-mentioned deadline, informing the public that the person has been found. Simultaneously with the cessation of publishing (broadcasting) the notification of the missing minor, and in order to protect the personal data of the minor, the media service provider shall, without delay, delete all data from the notification of the missing minor.

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

The protection of the private life and identity of victims is regulated by the Law on Public Information and Media.<sup>97</sup>

---

<sup>96</sup> [https://www.paragraf.rs/propisi/pravilnik\\_o\\_zastiti\\_prava\\_maloletnika\\_u\\_oblasti\\_pruzanja\\_medijskih\\_usluga.html](https://www.paragraf.rs/propisi/pravilnik_o_zastiti_prava_maloletnika_u_oblasti_pruzanja_medijskih_usluga.html)

<sup>97</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_javnom\\_informisanju\\_i\\_medijima.html](https://www.paragraf.rs/propisi/zakon_o_javnom_informisanju_i_medijima.html)



Article 90, paragraph 1 of the Law stipulates that the personal dignity (honour, reputation, i.e., respect) of the person to whom the information relates is legally protected, while paragraph 2 of the same article regulates that the publication of information that violates honour, reputation, i.e., respect, or that portrays a person in a false light by attributing traits or characteristics that they do not have, or by denying traits or characteristics that they do have, is not permitted if the interest in publishing the information does not outweigh the interest in protecting dignity and the right to authenticity, and especially if it does not contribute to the public debate about the phenomenon, event, or person to whom the information relates.

Article 91, paragraph 1 of the Law stipulates that information from private life, i.e., a personal record (letter, diary, note, digital record, etc.), a record of a person's face (photographic, cartoon, film, video, digital, etc.) and a voice recording (tape, gramophone, digital, etc.), may not be published without the consent of the person whose private life the information concerns, i.e., the person whose words, face or voice it contains, if it can be concluded at the time of publication who that person is.

Article 112 of the Law provides for judicial protection, and if the publication of information or records violates the right to personal dignity or the right to privacy, legal proceedings may be initiated. The right to file a lawsuit is granted to a person who has been personally harmed by the publication of information or a record, as well as to a legal entity whose activities aim to protect human rights in the event of a violation of the prohibition of hate speech and the rights and interests of minors. In accordance with the Law, a lawsuit is filed against the editor-in-chief of the media outlet in which the information or record was published.

During 2022, within the framework of the joint programme of the European Union and the Council of Europe "Horizontal Support Programme for the Western Balkans and Turkey" Phase II of the project "Prevention and Combating Trafficking in Human Beings in Serbia", a seminar on ethical and factual reporting on human trafficking was held, with the aim of promoting the protection of human rights, intended for media representatives. The seminar was attended by a total of 43 journalists from the Republic of Serbia.

Also, within the framework of the aforementioned project, the Council of Europe Office in Belgrade has launched a call for grants (small grants) open to journalists and media working in the Republic of Serbia, aimed at supporting investigative journalism for reporting on human trafficking in print and/or electronic media. Six micro grants for journalists and media, with a total value of 11,680 euros, were awarded (RTV Vranje, daily Danas, journalists Milica Kravić Aksamit and Silvija Stojić, Svet Roma and Tim radio Prnjavor) and more than 20 different articles, videos and radio shows were produced and published/broadcast with the aim of reporting on human trafficking in an ethical and factual manner.

The Ministry of Information and Telecommunications, in the competition for the improvement of professional and ethical standards in the field of public information, in 2022, supported the implementation of the project "Chapter VII of the Serbian Journalist Code guarantees respect for the privacy, dignity and integrity of people reported on", submitted by the Press Council. RSD 800,000.00 was approved for the implementation of the project.

Within the framework of the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2029, within the specific objective 3 "Improved prevention of human trafficking through raising awareness of the general and professional public and vulnerable groups about human trafficking and labour exploitation", a measure is foreseen that relates to raising public awareness about the problem of human trafficking with an emphasis on ethical media reporting. In order to continuously

improve ethical and professional standards in reporting on human trafficking and protecting the privacy and identity of victims, training for media service providers was implemented, organised by the Regulatory Body for Electronic Media and the Centre for the Protection of Victims of Human Trafficking, in which 23 journalists from 13 news outlets from all over Serbia participated. The training presented, through concrete examples, the problems that victims of human trafficking face due to unethical media reporting.

**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?**

The Ministry of Foreign Affairs has not recorded any cases of diplomatic missions of the Republic of Serbia, or foreign diplomatic missions accredited in the Republic of Serbia, employing local staff in conditions that could constitute forced labour or human trafficking.

Also, the Centre for the Protection of Victims of Human Trafficking has no information about such cases.

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

Within the Criminal Police Directorate, there are the Organised Crime Service and the Counter-Terrorism Service, which directly cooperate, especially in the field of human smuggling, in cases of violent criminal groups from Syria and Afghanistan that use or acquire firearms in their conflicts (for the purpose of human smuggling), and in this regard, exchange criminal intelligence on perpetrators of criminal acts as well as smuggled persons from the aforementioned areas. When considering specific cases that were jointly processed by the Organised Crime and Counter-Terrorism Services, no cases of recruitment of illegal migrants from the Republic of Serbia for the aforementioned purposes were identified.

According to data from the Centre for the Protection of Victims of Human Trafficking, in 2024, one person was identified who was exploited outside the territory of the Republic of Serbia, from the migrant population, who did not want to cooperate with the police and soon left the territory of the Republic of Serbia.

**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?**

In the Republic of Serbia, there are legal requirements for the detection and removal of internet content related to human trafficking, as follows:

- Article 388 of the Criminal Code<sup>98</sup> defines human trafficking,
- Laws on electronic communications and data protection<sup>99</sup><sup>100</sup> allow for the collection of retained data,

<sup>98</sup> <https://www.paragraf.rs/propisi/krivicni-zakonik-2019.html>

<sup>99</sup> <https://www.paragraf.rs/propisi/zakon-o-elektronskim-komunikacijama.html>

<sup>100</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_elektronskim\\_komunikacijama.html](https://www.paragraf.rs/propisi/zakon_o_elektronskim_komunikacijama.html)

- The Service for Combating High-Tech Crime of the Ministry of the Interior, established in accordance with the Law on the Organisation and Competence of State Bodies for Combating High-Tech Crime,<sup>101</sup> has access to individual platforms used to remove or block content.

Failure to comply with obligations by internet service providers registered in the territory of the Republic of Serbia may result in fines and possible criminal liability. Although the formal code is not binding, there is a practice of cooperation and internal protocols with larger providers.

If a violation occurs in the publication of programme content related to television and radio programmes, which is provided via the global information network (Internet), the Regulatory Body for Electronic Media shall determine it by acting upon the report of the applicant. If it is determined that the media service provider has committed a violation, the Regulatory Council may impose measures of admonition, warning, temporary ban on the publication of programme content, temporary ban on the publication of advertising messages, temporary withdrawal of the license or approval for the provision of media services or permanent withdrawal of the license or approval for the provision of media services.

Furthermore, the Law on Electronic Media<sup>102</sup> and its bylaws apply to all providers of radio and television media services, regardless of whether the media service is provided via the global information network (the Internet) or otherwise.

Victims are identified in cooperation with the police, social services and health institutions and referred to the Centre for the Protection of Victims of Human Trafficking, and they are entitled to comprehensive assistance and support. The Centre for the Protection of Victims of Human Trafficking also forwards all information about the existence of internet content related to human trafficking to the police and prosecutor's office for the purpose of prosecuting the criminal offence and protecting the victims.

### **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 concept of "vulnerability" and "abuse of a vulnerable position", although not explicitly formulated in the Criminal Code, is contained in the provision of Article 388 of the Criminal Code, taking into account the prescribed methods of committing the criminal offence of human trafficking.

Namely, in addition to force and threat, the following are prescribed as methods of committing the criminal offence of human trafficking: misleading or maintaining a person in a state of delusion, abuse of authority, trust, dependency, and the difficult circumstances of another, withholding personal documents, etc., which essentially represents abuse of a position of vulnerability, in accordance with the CoE Convention on Action against Trafficking in Human Beings.

Abuse of a position of vulnerability, in the sense of the legally prescribed methods of committing the criminal offence of Trafficking in Human Beings under Article 388 of the Criminal Code, is interpreted in each specific case in relation to objective and subjective circumstances, especially taking into

---

<sup>101</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_organizaciji\\_i\\_nadleznosti\\_drzavnih\\_organa\\_za\\_borbu\\_protiv\\_visokotehnoloskog\\_kriminala.html](https://www.paragraf.rs/propisi/zakon_o_organizaciji_i_nadleznosti_drzavnih_organa_za_borbu_protiv_visokotehnoloskog_kriminala.html)

<sup>102</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_elektronskim\\_medijima.html](https://www.paragraf.rs/propisi/zakon_o_elektronskim_medijima.html)

account the circumstances related to the victim, i.e., their personal and family circumstances, health condition, material and social status, age, relationship with the perpetrator and other factors that influence vulnerability, i.e., the overall situation in which a person, due to various circumstances of an objective or subjective nature, becomes a victim of trafficking in human beings due to the influence of various factors, i.e., a situation in which they have no freedom of choice, except to consent to exploitation. Moreover, in accordance with the provision of paragraph 10 of Article 388 of the Criminal Code, the consent of a person to exploitation or to the establishment of a slave-like or similar relationship referred to in paragraph 1 of this Article does not affect the existence of the criminal offence of trafficking in human beings.

The provision of paragraph 2 of Article 388 of the Criminal Code provides special criminal protection to minors, insofar as it stipulates that when an action is taken against a minor (a person under the age of 18), the criminal offence of human trafficking will exist even if the perpetrator did not use any of the prescribed methods of committing the criminal offence.

We cite an example that the Supreme Court of Serbia, in the case Kzz 915/2023 of 5 October 2023 in the case of labour exploitation of Serbian citizens in Russia, interpreted the difficult circumstances that led to the recruitment and then exploitation of 17 Serbian citizens in Russia and upheld the verdict of the Higher Court in Šabac K 28/14 of 7 February 2023 and the Court of Appeal in Novi Sad Kž1 391/23 of 07.06.2023. by which 2 suspects/accused persons were found guilty of committing the criminal offence of Trafficking in Human Beings under Article 388 of the Criminal Code.

In each individual case, the court takes into account these elements and the existence of the victim's vulnerability, whereby the different situations and positions of victims may indicate their vulnerability (e.g., gender and age, disability, poverty and difficult living conditions, etc.).

Example from case law – sexual exploitation of a minor victim, difficult family circumstances:

- Judgment of the Higher Court in Niš K.br.27/21 of 27 July 2022, which was confirmed by the judgment of the Court of Appeal in Niš Kž1 no.835/22 of 5 December 2022. Acting upon the request for protection of legality, the Supreme Court of Cassation, by judgment Kzz 75/2023 of 8 February 2023, modified the aforementioned judgments only in the part of the decision on criminal sanction, while in the remaining part it rejected the requests for protection of legality of the defence lawyers of the defendants.

The personality of the minor victim – victim of human trafficking

In this case, the minor victim belongs to the group of particularly vulnerable victims of human trafficking. She was a victim of sexual exploitation, and the perpetrator of the crime was her mother. At the time of the crime, starting in 2018, she was 12 years old.

The findings and opinion of the Centre for Social Work and the Centre for the Protection of Victims of Human Trafficking dated 21 August 2020 show that the minor victim lived with her mother, had a stepfather, who went to serve a prison sentence. After that, the mother of the victim, accused of AA, began to bring men and sexually exploit the minor victim. The findings and opinion of the Centre for the Protection of Victims of Human Trafficking stated that during the conversation, the minor victim, among other things, expressed emotional suffering, fear of coercion and possible realisation of threats. The stated opinion expressed the view that the minor victim DD is a victim of human trafficking who has been sexually exploited over a long period of time.

Criminal procedural status of a minor victim

The minor victim was provided with protection after she was identified as a victim of human trafficking, and then throughout the criminal proceedings. The protection is reflected in the measures taken for the minor victim to be placed in a Children's Shelter and separated from the environment where she was exposed to exploitation, then an urgent measure of temporary prohibition of the accused GG – mother from contacting the minor victim, as well as measures of criminal procedural protection in accordance with the Criminal Procedure Code and the Law on Juvenile Perpetrators of Criminal Offences and Criminal Legal Protection of Minors.

Thus, by the decision of 21 August 2020 and the temporary conclusion on providing accommodation of 13 August 2020, of the Centre for Social Work "Saint Sava" Niš, it was established that the minor victim is being accommodated in the Shelter of the Home for Children and Youth, starting from 10 August 2020, and a temporary guardian has been appointed for the same.

The public prosecutor also imposed an emergency measure on the defendant GG, a temporary ban on contacting and approaching the victim, a minor injured party.

During the criminal proceedings, the minor victim had the status of a particularly sensitive witness. Namely, the minor victim was first granted the status of a particularly sensitive witness by a decision of the Criminal Court in Niš, and then during the investigation, she was questioned in accordance with the provisions of the Law on Juvenile Perpetrators of Criminal Offences and Criminal Legal Protection of Minors (Articles 150 – 157 of the Criminal Procedure Code), taking into account the special provisions on the protection of minors as victims in criminal proceedings. Special provisions on the protection of minors as victims in criminal proceedings are contained in the Law on Juvenile Perpetrators of Criminal Offences and Criminal Protection of Minors. The minor victim was questioned in the presence of a representative of the Centre for Social Work in Niš as a guardian and expert representative of the victim, as well as the defence attorneys of all the defendants, and she described in full detail the actions of the defendants and her position, and for which actions the defendants were accused and declared guilty.

At the main hearing, she was also examined as a particularly sensitive witness, and after being warned that she was exempted from the duty to testify in accordance with the provisions of Article 94, paragraph 1, item 2 of the Criminal Procedure Code, the minor victim stated that she wanted to testify.

We believe that in this way, during the examination of the minor victim, both the right to defence of the accused and the right to protection of the victim of human trafficking were respected.

### Conclusion

The minor victim, who in criminal law had the status of a child, i.e., a person under 14 years of age, in this particular case was a victim of sexual exploitation by her mother, who committed the act by threatening and abusing the relationship of trust and dependence, by handing the minor victim over to other defendants and creating conditions for them to sexually exploit her,

From the aspect of victim protection, cooperation with the Centre for the Protection of Victims of Human Trafficking, the Centre for Social Work, the placement of the minor victim in the Shelter and the adoption of an urgent measure by the public prosecutor prohibiting the accused AA from approaching the minor victim are particularly important.

During the criminal proceedings, during the investigation and at the main hearing, the minor victim had the status of a specially protected witness, the examination was conducted in the presence of representatives of the Centre for Social Work, attorneys, as well as the defence attorneys of the accused,

in compliance with the provisions of the Law on Juvenile Perpetrators of Criminal Offences and Criminal Legal Protection of Minors. The minor victim was also warned of the rights of a privileged witness under Article 94, paragraph 1, item 2 of the Criminal Procedure Code, and expert opinions were conducted by a psychologist and a neuropsychiatrist, and measures were taken to minimize secondary victimisation.

#### Criminal sanction

All defendants were sentenced to prison terms, with defendant GG, the mother of the minor victim, being sentenced to five years in prison.

Example from case law – exploitation by establishing a slave relationship, the victim's particular vulnerability due to her mental state:

- By the judgment of the High Court in Niš K 101/2021 of 18 November 2022, which was confirmed by the judgment of the Court of Appeal in Niš Kž1 150/2023 of 30 May 2023, the defendants AA and BB were found guilty of committing the criminal offence of human trafficking in complicity under Article 388, paragraph 1, in conjunction with Article 33 of the Criminal Code and sentenced to 11 years in prison each. By the judgment of the Supreme Court Kzz 1042/2023 of 17 October 2023, the requests for protection of the defendants' defence lawyers filed against the aforementioned judgments were rejected as unfounded.

Defendants AA and BB were found guilty of committing the criminal offence of trafficking in human beings under Article 388, paragraph 1, in complicity in connection with Article 33 of the Criminal Code because, in the period from March 2019 to March 2021, in Niš, by jointly participating in the act of commission, by using a serious threat to harm the injured party and his family, they held the injured party, with the aim of exploiting his work, and established a servile relationship over the injured party, Dr. V.V. in order to take care of the defendants' health, support them, give them all the monthly income he earns from his pension and part-time work at a private clinic, where he is employed as a cardiologist, and in order to act according to their orders, whereby they restricted his freedom of movement and communication with other people and forced him, after his retirement in March 2019, to leave the family home in which he lived with his wife and daughters, and start living on the street under their control, which is why the injured party stood in front of the apartment and in the hall of the building where the defendants live during the day and acted according to their orders, and at night he slept in the car they use, which was rented and paid for by the injured party, and only when they allowed him to.

#### Personality of the injured party

The specificity of the specific case is specially made by the personality of the injured party who was brought and kept in a slave position. This is because the recruitment of victims of human trafficking is usually directed towards certain vulnerable members of society. However, in the specific case, the injured party was financially well-off, had a stable family situation, had graduated from medical school and specialised, and was a respected cardiologist who enjoyed respect in the environment in which he lived and worked. The question arises as to what circumstances in this case contributed to the defendants bringing the injured party into a slave position and financially exploiting him. The answer is the injured party's health condition, which was reflected in the severe mental disorder of the injured party, which completely changed his perception and experience of the defendants, especially the defendant AA.

The expert neuropsychiatrist stated in his findings and opinion that the injured party suffered from a mental illness, an organic disorder with insanity, at the time of the commission of the criminal act.

This is a permanent mental disorder resulting from organic brain damage. In the case of an organic disorder with insanity, the sufferer expresses delusional ideas, and in the case of the injured party, these were ideas of idealising the defendant A.A., with the subordination of his own will to the will of the defendant and a severe neglect of his own health and interests. Such a mental state of the injured party had an impact on his understanding, actions and relationship with the defendant.

At the time of the commission of the crime, the injured party was insanely attached to the accused A.A., with altruistic and saviour emotions and ideas, accepting neglect and a rough treatment of him, thus entering into a sadomasochistic relationship, while at the same time completely neglecting his own life, appearance and health, family and financial circumstances, so that in this split state he lost contact with reality and was unable to perceive his situation and the consequences he had suffered.

As a consequence of the violence experienced, the victim identifies with the aggressor as part of his insane relationship with the accused A.A. This insane relationship, a psychological fusion with the aggressor, creates an insane reality in which the victim perceives all actions he or she takes under the influence of the abuser as acts of his or her own will.

All of the above has precisely placed the injured party in the group of vulnerable and endangered persons. The above case points to another specific group, not so numerous, but present, of potential victims of human trafficking, namely persons with certain psychological disorders that make them suitable for being recruited and becoming victims of human trafficking and the subject of various forms of exploitation, in this case financial exploitation, but they can also be the subject of sexual exploitation or some other forms.

#### Procedural protection of a particularly sensitive witness Relevant provisions of the Criminal Procedure Code

Article 103, paragraph 1 of the Code of Criminal Procedure stipulates that a witness who is particularly sensitive due to his or her age, life experience, lifestyle, gender, state of health, nature, manner or consequences of the committed criminal offence, or other circumstances of the case, may be assigned the status of a particularly sensitive witness by the procedural authority ex officio, at the request of the parties or the witness himself or herself. Paragraph 3 of this Article stipulates that in order to protect the interests of a particularly sensitive witness, the procedural authority referred to in paragraph 2 of this Article shall issue a decision on the appointment of a representative for the witness, and the public prosecutor or the president of the court shall appoint a representative in order from the list of attorneys submitted to the court by the competent bar association for the appointment of ex officio defence counsel (Article 76). Article 104 of the Criminal Procedure Code prescribes the rules for questioning a particularly sensitive witness: Questions may be asked of a particularly sensitive witness only through the procedural authority, which shall treat him/her with special care, seeking to avoid possible harmful consequences of the criminal proceedings on the personality, physical and mental state of the witness. The questioning may be conducted with the assistance of a psychologist, social worker or other professional, as decided by the procedural authority.

If the procedural body decides to examine a particularly sensitive witness using technical means for transmitting images and sound, the examination shall be conducted without the presence of the parties and other participants in the proceedings in the room where the witness is located.

A particularly sensitive witness may also be questioned in his or her own apartment or other premises, or in an authorised institution that is professionally trained to question particularly sensitive persons.

In such a case, the body conducting the proceedings may order the application of the measures referred to in paragraph 2 of this Article.

A particularly sensitive witness may not be confronted with the defendant, unless the defendant requests it, and the procedural authority allows it, taking into account the degree of sensitivity of the witness and the rights of the defence.

The provisions of the Law on Juvenile Offenders and the Criminal Protection of Juveniles (hereinafter referred to as the Law on Juvenile Offenders and the Criminal Protection of Juveniles) also stipulate special protection for minors in criminal proceedings. Article 152 stipulates that when conducting proceedings for criminal offences committed against minors, the public prosecutor and judges in the panel shall treat the injured party taking into account his age, personality traits, education and the circumstances in which he lives, particularly striving to avoid possible harmful consequences of the proceedings on his personality and development. The hearing of minors shall be conducted with the assistance of a psychologist, pedagogue or other professional. Paragraph 2 of the aforementioned Article stipulates that if a minor who has been harmed by a criminal offence referred to in Article 150 of this Law is questioned as a witness, the questioning may be conducted no more than twice, and exceptionally more than once if necessary to achieve the purpose of the criminal proceedings. In the event that a minor is questioned more than twice, the judge is obliged to take special care of the protection of the personality and development of the minor.

Also, the judge may order that a minor be questioned using technical means for transmitting images and sound, and the questioning shall be conducted without the presence of the parties and other participants in the proceedings, in the room where the witness is located, so that the parties and persons entitled to do so may ask him questions through the judge, psychologist, pedagogue, social worker or other professional (paragraph 3).

When a minor is questioned in cases referred to in paragraphs 2, 3 and 4 of this Article, the minutes of his or her testimony shall always be read out at the main hearing, or a recording of the questioning shall be played.

Article 153 of the same law stipulates that if a minor is questioned as a witness and is particularly sensitive, or is in a particularly difficult mental state, due to the nature of the criminal offence, its consequences or other circumstances, it is prohibited to confront him or her with the accused.

A minor as an injured party must have a representative from the first hearing of the accused (Article 154). In the event that the minor does not have a representative, the president of the court shall appoint one by decision from among the lawyers who have acquired special knowledge in the field of children's rights and criminal protection of minors. The costs of representation shall be borne by the court's budget.

The aforementioned Rules of Procedure and Procedures of the Service for Providing Support and Assistance to Victims and Witnesses and the Contact Point for Informing Victims and Witnesses also stipulate the principle of preventing victimisation, which stipulates that when providing support and assistance, all measures are taken to protect against repeated and secondary victimisation (Article 11). It also stipulates the principle of protecting the best interests of the child (Article 12).

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

The criminal offence of Trafficking in Human Beings under Article 388 of the Criminal Code stipulates as a special form of the offence the fact that the offence was committed against a minor (paragraph 3). Additionally, it is stipulated as a special form of the offence if the defendant knew or



could have known that the person was a victim of trafficking in human beings and took advantage of their position, and a particularly qualifying circumstance is if the offence under paragraph 8 was committed against a minor (paragraphs 8 and 9):

.....

*Paragraph 1*

*Whoever, by force or threat, by misleading or maintaining a misleading person, by abuse of authority, trust, relationship of dependence, difficult circumstances of another, by withholding personal documents or by giving or receiving money or other benefits, recruits, transports, transfers, surrenders, sells, buys, mediates in the sale, hides or holds another person, for the purpose of exploiting his or her work, forced labour, committing criminal offences, prostitution or other types of sexual exploitation, begging, use for pornographic purposes, establishing a slave or similar relationship, for the purpose of taking away organs or body parts or for use in armed conflicts, shall be punished by imprisonment for three to twelve years.*

.....

*3) If the act referred to in paragraph 1 of this Article was committed against a minor, The perpetrator will be punished with imprisonment for at least five years.*

*(8) Whoever knows or could have known that a person is a victim of human trafficking, and exploits their position or enables another to exploit their position for the purpose of exploitation as provided for in paragraph 1 of this Article, shall be punished by imprisonment for a term of six months to five years.*

*(9) If the offence referred to in paragraph 8 of this Article was committed against a person whom the perpetrator knew or could have known was a minor, the perpetrator shall be punished by imprisonment for one to eight years.*

The Criminal Code, in Article 54, prescribes general rules for sentencing.

Article 54

*(1) The court shall impose a sentence on the perpetrator of a criminal offence within the limits prescribed by law for that offence, taking into account the purpose of the punishment and taking into account all circumstances that influence the sentence to be lower or higher (mitigating and aggravating circumstances), and in particular: the degree of guilt, the motives for the offence, the severity of the threat or damage to the protected property, the circumstances under which the offence was committed, the perpetrator's previous life, his personal circumstances, his behaviour after the offence was committed, and in particular his relationship with the victim of the offence, as well as other circumstances relating to the personality of the perpetrator.*

.....

*(3) A circumstance that is a characteristic of a criminal offence cannot be taken into account as an aggravating or mitigating circumstance, except if it exceeds the measure necessary for the existence of a criminal offence or a certain form of a criminal offence, or if there are two or more such circumstances, and only one is sufficient for the existence of a more serious or less serious form of a criminal offence.*

The relationship between the application of Article 388 and Article 54 of the Criminal Code was considered in the above-mentioned judgment Kzz 75/2023 of 8 February 2023.

The Supreme Court of Cassation reversed the judgments of the lower courts in the part of the decision on the sentence because it found that there was a violation of the law under Article 439, point 3 of the Criminal Procedure Code, because the lower courts acted contrary to the provision of Article 54, paragraph 3 of the Criminal Code, because they considered the circumstance that is a characteristic of the criminal offence for which the defendants were found guilty – the fact that the injured party is a minor – as aggravating. In the specific case, the principle of prohibiting double assessment of the same circumstance when determining the sentence was violated. When selecting and determining the criminal sanction, the court cannot take into account as aggravating circumstances those circumstances that are an element of the essence of the criminal offence or are qualifying circumstances or are contained in it by the very nature of the committed offence because they have already been taken into account when prescribing the sentence for that criminal offence

#### Conclusion

It can be concluded that the characteristics of the criminal offence in Article 388, paragraph 1, already substantially cover the issues of the victim's "vulnerability" through the description of the manner of committing the criminal offence – among other things, abuse of authority, trust, dependency, difficult circumstances of another. It follows from the above provisions of Article 388 of the Criminal Code that the issue of vulnerability is taken into account when determining the amount of the prescribed punishment, especially in the case of minor injured parties, as well as additionally in the case when the offence was committed against a person whom the defendant knew or should have known was a victim of human trafficking, and this circumstance cannot be additionally assessed as aggravating.

**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?**

Perpetrators of the crime of human trafficking most often abuse the economic vulnerability of the victims (poverty, unemployment), low level of education, psychological or emotional instability, addiction to alcohol or psychoactive substances, dependence on the perpetrator (emotional, material or physical, including the dependence of minors on their parents or guardians), and exposure to domestic violence – especially among minors and women.

In criminal proceedings, in addition to proving a position of vulnerability, it must also be proven that the perpetrator knew or could have known about the victim's vulnerability and that he abused such vulnerability.

In the practice of public prosecutors' offices, no significant challenges have been observed regarding proving abuse of the position of vulnerability of the injured party.

In individual, specific cases, the challenge may be to prove that certain life circumstances of the victim constitute "difficult circumstances", within the meaning of Article 388 of the Criminal Code, as well as the fact that victims are dependent on the perpetrators of the crime, and rarely report the crime and its perpetrators themselves, although they directly suffer the consequences of the abuse of their position of vulnerability.

#### Examples from practice:

- The perpetrators joined together in a group for the purpose of permanently committing the criminal offence of Trafficking in Human Beings under Art. 388, paragraph 6, in conjunction

with paragraph 1 of the Criminal Code, by using force, threats and deception to recruit, hold and sell the victim for the purpose of prostitution and other types of sexual exploitation.

The findings and opinion of the Centre for the Protection of Victims of Human Trafficking show that abuse of power and vulnerability was present throughout the exploitation, along with constant psychophysical abuse, because the defendants were aware of the life situation and family circumstances in which the victim lived. Also, psychiatric expertise determined that intellectual competencies were impaired to the limit and that when it comes to complex social situations, the victim is unable to cope adequately and to apply knowledge in the service of predicting consequences, which may make her vulnerable.

- The defendant, through abuse of trust, a relationship of dependence, and difficult family and financial circumstances, recruited his minor children to engage in begging and thus exploited them.
- They are accused of abusing the victim's difficult financial circumstances, unemployment and poverty, as well as the fact that the victim owed them significant amounts of money, and recruiting the victim to engage in begging. At a later stage, in order to continue the exploitation, they resorted to threats and physical force.
- By abusing trust and relationships of dependence, difficult financial and family circumstances, as well as the fact that the victim was from a war-torn area, the accused recruited the victim to engage in criminal acts. Later, in order to continue the exploitation, he used threats and force.

The criminal offence of Trafficking in Human Beings under Article 388 of the Criminal Code specifically stipulates as a qualifying circumstance the fact that the offence was committed against a minor (paragraph 3). Additionally, it is stipulated as a special form of the offence if the defendant knew or could have known that the person was a victim of trafficking in human beings and took advantage of their position, and a particularly qualifying circumstance is if the offence under paragraph 8 was committed against a minor (paragraphs 8 and 9):

In each case, the court determines the subjective attitude of the perpetrator of the criminal offence, that is, the awareness of all essential elements of the offence, as well as the objective circumstances and the perpetrator's attitude towards them.

Examples showing how the courts acted and assessed the relevant circumstances of the case and the vulnerability of the injured parties.

Example 1 – difficult circumstances of the injured parties, one injured party was an unemployed single mother

The Supreme Court, in its judgment Kzz 1791/2024 of 11 February 2025, took the position that, taking into account the actions of the defendants, there is a real concurrence of two criminal offences of trafficking in human beings under Article 388, paragraph 1, in conjunction with Article 33 of the Criminal Code and one criminal offence of mediation in prostitution under Article 184, paragraph 1, in conjunction with Article 33 of the Criminal Code. Therefore, depending on the specific case and the actions taken, there will not always be an apparent ideal concurrence of the consumption of one offence into another.

In the observed case, the defendants jointly committed two criminal offences of Trafficking in Human Beings under Article 388, paragraph 1, in conjunction with Article 33 of the Criminal Code, by using threats and abusing difficult circumstances against the injured parties AA and BB (the injured party AA was an unemployed single mother, and the injured party BB was in a difficult financial situation), by recruiting and holding them for the purpose of engaging in prostitution, by threatening them that

they would harm them and their families if they stopped working for them, that the girls' arms and legs would be broken if they gave information or stopped working, that they knew where the child went to kindergarten, and that they could take him or her if the injured party decided to quit her job, which both injured parties experienced as a serious threat and did not dare to turn to anyone for help, fearing for their own lives and the lives of their families.

Given that the acts of commission committed against the injured parties include the use of threats and abuse of the vulnerable circumstances of these injured parties, as well as their recruitment and detention for the purpose of committing prostitution, all the objective characteristics of the two criminal offences of Trafficking in Human Beings under Article 388, paragraph 1 of the Criminal Code are present.

Also, according to the operative part of the first-instance verdict, the defendants "incited and encouraged the injured party VV to engage in prostitution by creating conditions for her to engage in prostitution, by renting apartments for prostitution...advertising and promoting prostitution through the Internet", and as co-perpetrators they committed the criminal offence of mediation in prostitution under Article 184, paragraph 1, in conjunction with Article 33 of the Criminal Code.

#### Example 2 – abuse of difficult circumstances of minor victims

The Supreme Court of Cassation, in its judgment Kzz 1118/2020 of 20 October 2020 concluded that the actions of the defendant meet all the essential features of the criminal offence in question under Article 388, paragraph 6, in conjunction with paragraph 3, in conjunction with paragraph 1 of the Criminal Code, because according to the established facts, the defendant was found guilty of abusing difficult circumstances to recruit and transport other persons for the purpose of prostitution and sexual exploitation, by taking advantage of the immaturity of minors AA, VV, GG and DD and their difficult material, social and family circumstances (poor and dysfunctional families), knowing that they were minors, and persuading them to engage in sexual relations with adults in order to use their sexual services for financial compensation, representing to them that they would earn a lot of money in this way, and after agreeing with the beneficiaries of the place and time for providing sexual services, he drove the minors in his taxi. "...by vehicle or hired taxi drivers to transport them to the agreed place, and after the minors provided sexual services to the agreed beneficiaries, the defendant collected the agreed amount and gave part of it to the minor victims, while keeping part of the collected amount for himself and thus sexually exploited them, all the while offering their sexual services to a larger number of persons."

In the specific case, the court found that the defendant engaged in the described acts by repeatedly repeating the acts of execution in the period from November 2012 to 23 January 2013, as well as that he was aware that minors were injured, and that by abusing the difficult circumstances of another – the injured, he recruited and transported them for the purpose of prostitution and sexual exploitation.

Specifically, in the above case, the crime was committed by the defendants engaging in the criminal act of human trafficking against a minor, while the defendants were aware that the victim was a minor. The defendants committed the act of recruiting the minor victim, using force and threats, abusing her difficult circumstances, for the purpose of engaging in prostitution, while also exploiting her economically.

The legal provisions that criminalize the actions of the perpetrator of the criminal offence of human trafficking committed against a minor are particularly important from the point of view of protecting

minors, who very often appear as victims of human trafficking. This form of crime is punishable by imprisonment of three to twelve years.

Example 3 – minor victim, perpetrator of the criminal act is a police officer, recruitment  
By the judgment of the Higher Court in Jagodina K.br.6/22 of 25 October 2022 and by the judgment of the Court of Appeal in Kragujevac Kžl no.30/23 of 11 April 2023, the defendant D.A. was found guilty of committing the criminal offence of trafficking in human beings under Article 388, paragraph 3, in conjunction with paragraph 1 of the Criminal Code and sentenced to five years in prison. By the judgment of the Supreme Court Kzz. no. 739/2023, the request for protection of the legality of the defence counsel of the defendant D.A. was rejected.

It follows from the facts of the case that the accused D.A., abusing the fact that the minor victim AA from ..., born ... in 2000, placed an advertisement on the social network “Facebook” in which he was looking for men to hang out with, by threats and abusing his profession as a police officer, recruited the same person to engage in prostitution for his account in the future, in order to obtain unlawful property benefits for himself...”

When he saw the ad that the minor victim A.A. posted on the social network Facebook, he contacted the victim from his mobile phone to her mobile phone number 064/... via SMS messages, as well as using the “Viber” application, telling her that he wanted her to allegedly provide him with a sexual service in the form of sexual intercourse for which he would pay, and when he found out her address, that she lived alone in ..., that she charged RSD 2,000.00 for sexual intercourse, in the evening hours of an unspecified day in April 2018, he came to the apartment she rented at ul. ... no. ..., dressed in the official uniform of a police officer and when he learned from the injured party that she was a minor, that she was 17 years old, he told her that the police officer, that he would find her customers to provide sexual services for money, demanded that she pay him RSD 2,000.00 a week for his services and that she personally, at his request, provide sexual services to him for free ... that she would be able to provide the services without any problems and that he would not report her to the police for what she was doing, and that if she did not accept his offer, she would end up in prison and a correctional facility. After the injured party told him to leave her apartment, he told her that he would call her again to ask if she accepted his offer and that he would contact her soon, and after a few days he called the injured party again on her mobile phone from his mobile phone number 061/... and asked what she had decided. When the injured party told him that she did not want to accept his offer, he insisted that the injured party think carefully and said that he would call her again and that it would not go well if she did not agree.

The Court of Appeal pointed out that recruitment within the meaning of Art. 388 of the Criminal Code represents inducing a certain person to become a passive subject of a criminal act by pointing out the positive aspects of engaging in prostitution, so in the criminal law sense, recruitment coincides with the concept of incitement, which can be achieved by any action suitable for creating or strengthening an appropriate decision in the passive subject – in this case, the injured party. In the specific case, the defendant D.A., recruited the minor victim by abusing his position of a police officer, persuading and demanding that she provide him with free sexual services... as well as by threatening that if she did not accept his offer she would end up in prison or a correctional facility.... The Court of Appeal clarifies that the manner of committing this criminal offence can be more subtle and not so violent, and that making the victim appear “that things will not go well for her if she does not agree” and that she will end up in a correctional facility or prison, also has the character of a threat according to international standards as one of the ways of committing this criminal offence. The Court of Appeal referred, among other things, to Article 4a of the CoE Convention on Action against Trafficking in Human Beings.

The Court of Appeal found that the criminal act was committed even though there was no unlawful gain for the defendant, as the purpose of engaging in prostitution for his own account, and that it was sufficient to prove the existence of the intention to commit some form of exploitation, as indicated by the provision of Article 21, paragraph 2 of the CoE Convention on Action against Trafficking in Human Beings.

Example 4 – labour exploitation of a large number of workers, difficult financial circumstances of the injured parties

By the verdict of the Higher Court in Šabac K 28/14 of 7 February 2023, which was confirmed by the verdict of the Court of Appeal in Novi Sad Kž1 391/23 of 7 June 2023, the defendant AA was found guilty of the extended criminal offence of human trafficking in complicity under Article 388, paragraph 1 of the Criminal Code in conjunction with Articles 33 and 61 of the Criminal Code, and sentenced to 3 (three) years and 6 (six) months in prison, and the defendant BB was found guilty of the criminal offence of human trafficking in complicity under Article 388, paragraph 1 of the Criminal Code in conjunction with Article 33 of the Criminal Code, and sentenced to 3 (three) years in prison.

By the Supreme Court Judgment Kzz 915/2023 of 5 October 2023 the request for protection of legality of the defence counsel of the defendant AA, filed against the aforementioned judgments, was rejected as unfounded. In the judgment Kzz 915/2023 of 5 October 2023, the Supreme Court took the position that the operative part of the contested judgment in paragraph II describes the act of committing the criminal offence of trafficking in human beings under Article 388, paragraph 1. Criminal Code – recruitment, which the defendants AA and BB undertook against 17 injured parties as co-perpetrators within the meaning of Article 33 of the Criminal Code, and the defendant AA also independently in relation to another act of committing against 31 injured parties.

The factual description also reveals the manner in which this criminal offence was committed, namely: abuse of difficult circumstances and misleading and keeping the injured parties in delusion...” all actions were also taken with the aim of labour exploitation of the injured parties.

All the described actions, which are linked, point to the conclusion that the actions of recruiting the injured parties by the defendants AA and BB were directed towards the goal that was achieved, the labour exploitation of the injured parties, by abusing difficult circumstances and misleading and maintaining them.

The facts of the case show that in the specific case, first 17 people, and then another 31 people, were victims of labour exploitation.

From the statements of the injured parties given during the criminal proceedings, it follows that the financial circumstances of almost all of them were that they were unemployed or without permanent employment, and the fact that they decided to separate from their families and go to work abroad shows that they saw this as a way to get out of a poor environment and provide their families with a better life.

In this way, the social status of the victims shows that they are the same, we can say “typical” target group of human traffickers, who recruit victims for labour exploitation.

All the circumstances of the specific case indicate that they were victims of human trafficking and exposed to labour exploitation.

The court concluded that the specific case involved labour exploitation, because although the injured parties voluntarily went to Belarus for employment and work, they were put in a hopeless situation there, as they did not have the material means to return to their home country, since the defendants did not pay them their wages, and they also took their passports, so they were forced to stay and work unpaid, with the belief that at some point the defendant would pay them the money.

Forced labour is also indicated by the accommodation facilities in which the injured were housed, working conditions, unpaid wages, being kept in fear, and restrictions on freedom of movement.

The victims state that the place where they were housed resembled a prison and that everything resembled a “prison”. The victims testify that they were first housed in a house where there were supposed to be 20 of them in a room, with bars on the windows and military beds without mattresses and bedding, then they were transferred to the “Ptich” children’s resort, 60km from Minsk, where they were in the forest, in wooden barracks that no one had stayed in for years, so everything was dirty, and there was no bathroom or toilet, and they defecated in the forest. The denial of adequate food is another form of poor living conditions that the court found to exist in the specific case, as the victims were not given enough food to eat, which forced them to search for food around the facility where they were housed, and some of them stated that they picked mushrooms, pulled carrots from the garden, and picked fruit and corn. The victims lost up to 20 kilograms of weight, suffered physical ailments such as fainting, and had psychological problems due to the lack of food, all of which illustrates the intolerable living and working conditions in Russia and Belarus.

The victims’ freedom of movement was also restricted through intimidation, given that several victims stated that the accused AA told them to be careful how they moved, because they could be arrested by immigration services. In addition, in this specific case, another method of restricting freedom was used, which was financial dependence, because by not paying the victims their earnings, the defendants deprived them of resources, constantly keeping them in hope with false promises that the money would be paid.

The court also concluded that the duration of exploitation is not a decisive factor in determining the existence of a criminal offence, so it was irrelevant that certain victims were on the territory of Belarus for a relatively short period and managed to return to Serbia.

In relation to individual victims, there are also certificates from the Centre for the Protection of Victims of Human Trafficking in Belgrade, which identify them as victims of human trafficking by the Service for the Coordination of the Protection of Victims of Human Trafficking.

See also examples related to question number 32 (minor victim, person with mental illness).

**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 a position of vulnerability” is analysed in training sessions on human trafficking, through consultations with public prosecutors who are handling specific cases, as well as within the framework of the analysis of the positive legal framework and the proper understanding of the elements of the criminal offence of human trafficking, in which segment the relevant case law of the European Court of Human Rights is of exceptional importance.

All training programmes of the Judicial Academy that deal with the topic of human trafficking address the concept of “abuse of a position of vulnerability” through one of the thematic units. In the requested period, the Judicial Academy implemented training on the following topics: “Application of the

principle of non-punishment of victims of human trafficking”, “Prevention and suppression of human trafficking for the purpose of labour exploitation and forced labour – a multi-sectoral approach”, “Protection of victims of human trafficking during criminal proceedings”, “Simulation of a trial in a case for the criminal offence of human trafficking”. In cooperation with the Office of the Council of Europe, online training was also implemented – HELP course on the topic of “Suppression and fight against human trafficking”.

The following publications are available from the electronic library of the Judicial Academy:

- Preventing impunity for human traffickers and supporting victims – analysis of selected cases<sup>103</sup>
- Guidelines for improving judicial practice in proceedings for compensation of damage to victims of serious crimes in criminal proceedings<sup>104</sup>

Also, during 2025, the “Annual Conference of Judges of the Republic of Serbia – Judges’ Days 2025” was held for about 400 judges, which, among other things, addressed the topic “The Criminal Offence of Human Trafficking with a Focus on the Concept of Victim”.<sup>105</sup>

### **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?**

Procedures and measures that take into account the specific needs of vulnerable victims at different stages of criminal proceedings are prescribed by the Criminal Procedure Code, primarily through the institution of a particularly vulnerable witness.

Namely, the procedural authority (public prosecutor or court) may, *ex officio*, at the request of the parties or the witness himself, assign the status of a particularly sensitive witness to a witness who is particularly sensitive due to his age, life experience, lifestyle, gender, health condition, nature, manner or consequences of the committed criminal offence, or other circumstances of the case.

Determining the status of a particularly sensitive witness may constitute the basis for appointing a proxy for such a witness, as an additional form of his/her protection. The Criminal Procedure Code prescribes special rules on the examination of a particularly sensitive witness, to whom questions may be asked only through the body of the procedure, which will treat him/her with special care, trying to avoid possible harmful consequences of the criminal procedure on the personality, physical and mental state of the witness. Also, the examination may be conducted with the assistance of a psychologist, social worker or other professional, as decided by the body of the procedure, and a particularly sensitive witness may also be examined using technical means for transmitting images and sound, without the presence of the parties and other participants in the procedure, in the room where the witness is located. A particularly sensitive witness may be examined in his/her apartment or another room, or in an authorised institution that is professionally trained for the examination of particularly sensitive persons. A particularly sensitive witness may not be confronted with the defendant, unless the defendant requests it, and the procedural authority allows it, taking into account the degree of sensitivity of the witness and the rights of the defence.

The aforementioned legal provisions provide the possibility of additional protection for witnesses who, due to certain circumstances of a subjective and/or objective nature, appear to be particularly sensitive

<sup>103</sup> <https://www.pars.rs/public/Dokumenti/Publikacije/336/SPRECAVANJE-NEKAZNIVOSTI-TRGOVACA-LJUDIMA-I-PODRSKA-ZRTVAMA-TRGOVINE-LJUDIMA.pdf>

<sup>104</sup> <https://www.pars.rs/public/Dokumenti/Publikacije/1159/Smernice-za-unapredjenje-sudske-prakse-u-postupcima-za-naknadu-stete-zrtvama-teskih-krivicnih-dela-u-krivicnom-postupku.pdf>

<sup>105</sup> <https://www.vrh.sud.rs/sites/default/files/attachments/Program%202025%20SRB.pdf>



and were established with the aim of preventing secondary victimisation of the injured party as a witness.

**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 use of the services of a victim of human trafficking is criminalised under the provisions of Article 388 of the Criminal Code. Paragraph 8 of this Article stipulates:

(8) Whoever knows or could have known that a person is a victim of human trafficking, and exploits their position or enables another to exploit their position for the purpose of exploitation as provided for in paragraph 1 of this Article, shall be punished by imprisonment for a term of six months to five years.

An additional aggravated form of the offence referred to in paragraph 8 is prescribed in the case when the offence is committed against a minor:

(9) If the offence referred to in paragraph 8 of this Article was committed against a person whom the perpetrator knew or could have known was a minor, the perpetrator shall be punished by imprisonment for one to eight years.

An example from the practice of the Supreme Public Prosecutor's Office:

- The defendant was found guilty and convicted by a final judgment because during June and July 2021 in the villages of A and B, capable of understanding the significance of his act and managing his actions, aware of his act and its prohibition, and wanting to commit it, knowing that the injured party was a victim of human trafficking, he enabled the defendants AA, BB and DD to exploit her position for the purpose of sexual exploitation, by knowing that the defendants AA, BB and DD were sexually exploiting the injured party, by forcing her to provide sexual services to men for money by force and threats, and by enabling the defendants to exploit her position for the purpose of sexual exploitation by inviting MM, NS and MV and offering them sexual relations with the injured party for a sum of money that they would give to the defendants;
- The defendant was found guilty and convicted by a final judgment because, in the period from June 2022 to September 2022, while in a state of mental capacity, knowing that the injured party NN, born in 2005, was a victim of human trafficking and that she was a minor, enabled the convicted EI, in relation to whom the criminal proceedings were separated and who was convicted of the criminal offence of human trafficking under Art. 388, paragraph 2 in conjunction with para. 1 of the Criminal Code, exploitation of her position for the purpose of prostitution, in that, knowing that the convicted EI recruited and used the minor victim NN for the purpose of prostitution, he enabled the convicted EI to bring the minor victim to the X hostel, owned by the convicted BM, so that the victim could provide sexual services to men for a fee previously agreed upon by the convicted EI, while he knew that the victim was a minor, which is why he did not record her stay in the said hostel and while she was providing sexual services to clients, the convicted waited with the convicted EI in the hostel and took money in the amount of RSD 3,500 for a room from clients who had sexual relations with the minor victim, while the convicted EI took money in the amount of EUR 50 from the clients for the sexual services she provided. provided by a minor injured party, where he was aware of his act, its prohibition, and wanted it to be carried out;
- The defendant was found guilty and sentenced because on an unspecified date in the period from June 2022 to September 2022, while in a state of mental capacity, knowing that the minor victim was a victim of human trafficking, he took advantage of her position and enabled the convicted EI, in relation to whom the criminal proceedings were separated and who was convicted of the

criminal offence of human trafficking under Art. 388, paragraph 2 in conjunction with para. 1 of the Criminal Code, exploitation of her position for the purpose of prostitution, in that, knowing that the convicted EI had recruited and used the minor victim for the purpose of prostitution, he agreed with the convicted EI over the phone that the minor victim would provide him with sexual services for the sum of EUR 50 at Hotel X, where he rented a room and waited for the minor victim and after she provided him with sexual services, he gave her money in the amount of 50 euros, which she handed over to the convicted EI, whereby he was aware of his act, its prohibition and wanted it to be carried out.

With regard to the above-mentioned form from paragraph 8 of the criminal act of Trafficking in Human Beings, we point to the judgments of the High Court in Niš, which issued four judgments (based on plea agreements):

- 1) K.46/94, Spk 30/24, verdict of 21 June 2024, the defendant was convicted of the criminal offence of Trafficking in Human Beings under Article 388, paragraph 9 in connection with paragraphs 8 and 1 of the Criminal Code, sentenced to 1 year in prison, the injured party is instructed to pursue her property claim in civil proceedings;
- 2) K.45/24, Spk 29/24, verdict of 21 June 2024, the defendant was convicted of the criminal offence of Trafficking in Human Beings under Article 388 paragraph 9 in connection with paragraphs 8 and 1 of the Criminal Code, was sentenced to 1 year in prison, and is obliged to pay the injured party RSD 300,000 as a property claim.
- 3) Spk no. 19/24, verdict of 24 April 2024, the defendant was convicted of the criminal offence of Trafficking in Human Beings under Article 388, paragraph 9 in connection with paragraphs 8 and 1 of the Criminal Code, was sentenced to 1 year in prison, and is obliged to pay the injured party RSD 300,000 as a property claim;
- 4) Spk no. 9/24, verdict of 12 March 2024, the defendant was convicted of the criminal offence of Trafficking in Human Beings under Article 388, paragraph 3 in connection with paragraph 1 of the Criminal Code, was sentenced to 3 years in prison, and is obliged to pay the injured party RSD 500,000 as a property claim;

All of the above judgments relate to the same criminal event, where two defendants paid money for the provision of sexual services by a minor victim, one defendant allowed the other defendant to bring the minor victim to a hostel to provide sexual services to men, while failing to record the minor victim's stay at the hostel and taking money for the use of the room from the minor victim's clients. The fourth defendant (female) recruited the minor victim for prostitution and arranged sexual relations with the victim for monetary compensation with several men. From the above judgments, we see that the victim was awarded a property claim in the criminal proceedings (three judgments).

The Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2029 recognised the importance of strengthening the capacity of judges in misdemeanour courts who have misdemeanours within their jurisdiction in which victims of human trafficking may appear (prostitution, begging, especially organised minor begging, forced labour, illegal migration, even in some areas of preventing domestic violence). In accordance with the Action Plan for the Implementation of the Programme, 67 contact points have been designated for the identification of cases of human trafficking in misdemeanour proceedings in the Misdemeanour Court of Appeal and misdemeanour courts in the Republic of Serbia.

Also, in accordance with the Action Plan for the Implementation of the Programme to Combat Trafficking in Human Beings in the Republic of Serbia for the period 2024-2026, in order to improve and strengthen the system for detecting and prosecuting the criminal offence of human trafficking

during 2024, the importance of developing regulations and improving practices that reduce the challenges faced by victims of gender-based violence while going through the procedures of the justice system has been recognised. An analysis “Possibility and Prospects for Identifying Victims of Human Trafficking during Misdemeanour Proceedings”<sup>106</sup> was prepared, with the support of the United States Agency for International Development as part of the “Justice for All” project, which dealt, among other things, with misdemeanours of minors, foreigners, and migrants who appear as defendants in the proceedings for the misdemeanours of begging and prostitution. The aim of the analysis is to contribute to raising the level of awareness among the professional public about the importance of identifying victims of human trafficking when these persons are in the procedural position of defendants in misdemeanour proceedings. The analysis attempted to provide adequate solutions for identifying victims of human trafficking in misdemeanour proceedings where the perpetrators are persons belonging to vulnerable categories, such as minors, women, foreigners, workers or beggars, with the importance of a multidisciplinary approach and continuous training of misdemeanour court judges.

Also, with the support of the OSCE Mission to the Republic of Serbia, the second edition of the publication “Legal Framework and Recommendations for the Implementation of the Principle of Non-Punishment of Victims of Trafficking in Human Beings in the Republic of Serbia”<sup>107</sup> was produced, intended for judges of criminal and misdemeanour courts, public prosecutors and police officers, which was harmonised with changes to the Constitution and criminal and misdemeanour legislation, supplemented with sections related to misdemeanour proceedings, information from new sources and examples of the application of the principle of non-punishment in practice.

### **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?**

The following tools are used to support investigations and improve the prosecution of human trafficking cases:

- Forensic tools: EnCase, Cellebrite, Oxygen Forensics,
- International cooperation: with EUROPOL, INTERPOL, and through a 24/7 contact network,
- OSINT methods: monitoring public sources and communications,
- Urgent requests to platforms (Meta, Google, TikTok) in real time.

In two terms, in 2022, an online training and presentation of the “CEPOL” training on the topic “Human Trafficking in the Digital Environment” was held, which discussed the following topics: the advantages and challenges of using modern technologies in the fight against human trafficking, EUROPOL support services for combating cross-border human trafficking in digital form, tools for monitoring prostitution within the framework of high-tech crime investigations, the impact of the pandemic on the phenomenon of human trafficking. Also, topics related to cryptocurrencies and money laundering in the digital environment were discussed, as well as tools that can be used in financial investigations in the digital environment. 10 representatives of the Ministry of the Interior of the Republic of Serbia participated in the training.

Within the framework of the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2029, the need to improve the system for detecting and prosecuting the criminal offence of Human Trafficking has been recognised, with an emphasis on collecting all types of evidence, including digital and financial evidence, applying special evidentiary measures, and

<sup>106</sup>

file:///C:/Users/User/Downloads/Priuru%C4%8Dnik%20\_Mogu%C4%87nosti%20i%20perspektive%20prepoznavanja%20C5%Bertava%20trgovine%20Ijudima%20u%20toku%20prekr%C5%A1ajnog%20postupka\_.pdf

<sup>107</sup> <https://www.osce.org/files/f/documents/f/7/469509.pdf>

strengthening information exchange and cooperation. In accordance with the Action Plan for the Implementation of the Programme for the period 2024-2026, it is planned to conduct training for police and public prosecutors in the field of digital investigations in order to take a proactive approach to detecting the criminal offence of Human Trafficking in accordance with current trends.

In 2024, a workshop “Human Trafficking through the Internet and Technology” was held, which was implemented within the project “Strengthening the Fight against Human Trafficking in Serbia”, which is implemented within the framework of the joint programme of the Council of Europe and the European Union “Horizontal Facility for the Western Balkans and Turkey 2023-2026”.

Also, in 2024, two trainings, basic and advanced level, on conducting digital investigations in human trafficking were held for key participants in human trafficking and migrant smuggling investigations, within the sub-regional project “Western Balkans Joint Action against Migrant Smuggling and Trafficking in Human Beings – (WBJUST)”, which provided an additional level of knowledge to representatives of the police, public prosecution and judges on high-tech crime and electronic evidence in the specific sub-area of criminal law dealing with human trafficking. The training also provided an advanced level of understanding and application of advanced techniques of legal analysis of electronic evidence obtained during the pre-investigation, investigation, as well as the main hearing phase in criminal proceedings conducted *ex officio*. The training was attended by approximately 30 participants.

Following the two trainings, a regional training of trainers was also implemented on the topic of conducting digital investigations, including cryptocurrency monitoring and victim-focused interviewing techniques in cases of human trafficking and migrant smuggling. The training included teaching methods and simulations for hands-on learning, with a dedicated module focusing on didactics/teaching methods. The participants of the training were representatives of the Working Groups and police officers involved in investigations of human trafficking and smuggling, representatives of prosecutors’ offices, as well as social services/service providers providing assistance and protection to victims of human trafficking from Bosnia and Herzegovina, Montenegro, North Macedonia and Serbia.

As a follow-up to the above-mentioned regional training, participants who completed the regional training for trainers on conducting digital investigations implemented a national training (roll-out) on conducting digital investigations, in March 2025, for key participants in human trafficking and migrant smuggling investigations, which was attended by 25 representatives of the police and prosecutor’s office.

As an example of good practice in the organisation of the International Organisation for Migration (IOM), the project “Western Balkans Joint Action against Migrant Smuggling and Trafficking in Persons – (WBJUST)”, the participants who underwent the regional training, mentioned above, implemented basic training on the use of advanced technologies and conducting digital investigations for 15 representatives of the police of the Ministry of Interior of the Republic of North Macedonia who participate in investigations of human trafficking and migrant smuggling. The aforementioned training was conducted in accordance with the Agreement on Cooperation in the Field of Combating Human Trafficking with the Republic of North Macedonia and the Agreement on Cooperation in the Field of Smuggling of Persons with the Republic of North Macedonia.

Organised by the UN Office on Drugs and Crime (UNODC) in the Republic of Croatia, during 2025, a thematic discussion was held on forms of cybercrime – online sexual abuse and exploitation of

children and revenge pornography, in which representatives of the Ministry of the Interior of the Republic of Serbia participated.

In 2024, a conference was held in Bosnia and Herzegovina, within the framework of the joint programme of the Council of Europe and the European Union “Horizontal Facility for the Western Balkans and Turkey 2023-2026”, on the topic of preventing human trafficking in the digital environment, strengthening cooperation between all relevant actors and strengthening synergy between institutions and conventions of the Council of Europe, which was attended by representatives of the police, prosecutors’ offices, international organisations, technology companies and civil society organisations.

Judges and prosecutors specialising in high-tech crime are offered training in this field within the Judicial Academy, which aims to develop the competencies necessary for work in special departments.

**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?**

The Republic of Serbia is a signatory to the Budapest Convention and actively implements its provisions:

- Articles 18, 19 and 20 are regularly used in investigations with a digital component,
- A 24/7 network of contact points is used for urgent international data exchange,
- The standards from the Convention have been integrated into the training of prosecutors and police officers.

In 2009, the Republic of Serbia ratified the Council of Europe Convention on Cybercrime (ETS No. 185), the so-called Budapest Convention, which established an international legal framework for combating high-tech crime and obtaining digital evidence. The Convention entered into force in Serbia on 1 March 2010, and the ratification was published in the Official Gazette of the Republic of Serbia.<sup>108</sup>

In addition, on 9 February 2023, Serbia became the first Council of Europe member state to ratify the Second Additional Protocol to the Convention on Cybercrime,<sup>109</sup> which concerns the strengthening of international cooperation and the faster exchange of electronic evidence. This protocol further enhances the ability of law enforcement authorities, in cooperation with foreign partners and private service providers, to obtain digital traces necessary for investigations of organised crime, including trafficking in human beings.

The following provisions are of particular importance for investigations into human trafficking:

**Article 18 – Order for the provision of data**

It allows competent authorities to oblige service providers or individuals to provide subscriber data and other electronic data in their possession. In the context of human trafficking, this means that information about social media accounts, phone numbers, email addresses and other forms of digital identity of victims and perpetrators can be obtained.

**Article 19 – Search and seizure of computer systems**

It provides for the authority to search and seize computers, mobile phones and other devices, while securing data against deletion or alteration. In practice, human trafficking investigations refer to the

<sup>108</sup> [http://demo.paragraf.rs/demo/combined/Old/t/t2009\\_03/t03\\_0151.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2009_03/t03_0151.htm)

<sup>109</sup> <https://pravno-informacioni-sistem.rs/eli/rep/mu/skupstina/zakon/2022/7/6/reg>

seizure of mobile phones, laptops, external drives and cloud accounts, where evidence of communication, photographs or videos of exploitation are often found.

#### Article 20 – Real-time collection of communication data

It authorises the collection of real-time communication data (e.g., IP addresses, location, duration and flow of communication, without insight into the content). This is used in investigations in situations where the movement of suspects or victims is being monitored, or where there is a risk of the victim being immediately transferred to another country.

The Republic of Serbia, after ratifying the Convention, amended the Criminal Code and adopted the Law on the Organisation and Competence of State Authorities for Combating High-Tech Crime,<sup>110</sup> thus providing an institutional and procedural basis for the implementation of these provisions.

In cases of human trafficking:

Article 18 is used to obtain data from telecommunications and internet operators (e.g., identity of SIM card users, registration of telephone numbers, IP addresses). Article 19 is applied when searching mobile phones and computers of suspects, whereby the police and prosecutors use digital forensic tools to extract communication data, photographs, locations and other relevant evidence. Article 20 enables urgent real-time monitoring of communication data, which is of particular importance in rescue operations and tracking of organised crime groups crossing national borders.

By adopting and ratifying the Second Additional Protocol, Serbia has further strengthened its capacities for international cooperation, especially in faster obtaining of digital data from foreign companies and authorities, which is crucial in cases of human trafficking where perpetrators often operate across multiple jurisdictions.

By ratifying the Budapest Convention and its Second Additional Protocol, Serbia has aligned its legal system with international standards in the field of cybercrime and digital evidence. Its provisions, in particular Articles 18, 19 and 20, provide the basis for obtaining digital traces that are often crucial in human trafficking investigations. Serbia has enabled their practical application through legislative and institutional reforms, and through the Additional Protocol has ensured faster and more efficient international cooperation, which significantly improves the efficiency of detecting, proving and prosecuting these crimes.

## 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:

#### ➤ **guarantee trafficking victims' access to legal assistance and free legal aid;**

In line with the recommendation to take further steps to guarantee victims of human trafficking access to legal support and free legal aid, we point out the following:

The Law on Free Legal Aid<sup>111</sup> in its Article 4, paragraph 3, item 5) prescribes special protection for the most vulnerable groups of persons, including persons who exercise legal protection against torture, inhuman or degrading treatment or punishment, or human trafficking.

---

<sup>110</sup> [https://www.paragraf.rs/propisi/zakon\\_o\\_organizaciji\\_i\\_nadleznosti\\_drzavnih\\_organa\\_za\\_borbu\\_protiv\\_visokotehnoloskog\\_kriminala.html](https://www.paragraf.rs/propisi/zakon_o_organizaciji_i_nadleznosti_drzavnih_organa_za_borbu_protiv_visokotehnoloskog_kriminala.html)

<sup>111</sup> <https://www.paragraf.rs/propisi/zakon-o-besplatnoj-pravnoj-pomoci.html>

When filling out the Request for Free Legal Aid, applicants are provided with assistance in filling out the form by the persons who decide on the requests, if they need such assistance. Applicants who belong to one of the 13 vulnerable groups of persons prescribed by the provision of Article 4, paragraph 3 of the Law on Free Legal Aid, including victims of human trafficking, need only circle that they belong to that group of persons, in which case the Law provides them with a higher level of protection in such a way that these persons are not required to meet the conditions related to their material and financial status. In other words, in such cases, the right to free legal aid is granted and the beneficiary will be referred to a free legal aid provider from among the lawyers.

Also, on 23 April 2024, the Ministry of Justice electronically sent a Request for Extraordinary Reporting to local government units and city municipalities, which relates to the collection of data related to the criminal offence of Human Trafficking. In response, local government units and city municipalities stated that they had no beneficiaries of free legal aid related to the matter of human trafficking. The regular annual report of the Ministry of Justice on supervision over the implementation of the Law on Free Legal Aid was compiled on the basis of the Regular Annual Reports of administrative bodies and the Regular Annual Reports of providers of free legal aid and free legal support, in which they reported that there were no beneficiaries of victims of human trafficking.

According to the reports submitted in response to the Request for Extraordinary Reporting sent to local government units and city municipalities, regarding the provision of free legal aid, and in connection with the criminal offence of Human Trafficking, there were no users of free legal aid related to the matter of human trafficking, nor were there any procedures for reimbursement of costs for the free legal aid provided.

The provision of Article 39 of the Law on Free Legal Aid also stipulates the possibility of financing free legal aid and free legal support from donations and project financing. Also, the provision of Article 42 of the Law on Free Legal Aid provides for project financing from public revenues, which stipulates that funds intended for project financing of free legal aid or free legal support, which are provided from public revenues, may be transferred only to a provider who is registered in accordance with this Law (Article 16, paragraphs 1 and 3), and to bar associations. For the purpose of project financing, a public call, i.e., a public competition, is announced.

The Ministry of Justice implemented project activities within the “You Have the Right” campaign, the aim of which is to inform the public about the availability of free legal aid, on which a Joint Statement by the Minister of Justice and the Minister of Public Administration and Local Self-Government was signed on 29 March 2023. The campaign is supported by the project “Strengthening the Rule of Law in Serbia – EU for the Fight against Corruption and Fundamental Rights”, jointly funded by the EU and the German Federal Ministry for Economic Cooperation and Development (BMZ), and implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ). The campaign involves publishing audio and video material in order to reach as many citizens as possible, including victims of human trafficking, since audio and video formats are the most effective in communicating with the wider public, and these formats more easily attract attention and enable clearer understanding of messages.

Information on the possibility of exercising the right to free legal aid is continuously provided, both at the level of state bodies and at the level of local self-government bodies. The campaign “You have the right!”<sup>112</sup> which is being implemented, deals with the promotion of free legal aid mechanisms, with the aim of raising public awareness of their existence and the opportunities they provide. The campaign

---

<sup>112</sup> [www.imaspravo.rs](http://www.imaspravo.rs)

is being implemented through phased implementation, and in the first part of its implementation, which began in October 2024, in parallel with training for the implementation of the Law on Free Legal Aid, a series of activities aimed at communication with local media were implemented. The campaign is divided into two flights and is being implemented through national, regional and local media, for which numerous activities are being undertaken. The first flight of the campaign includes the organisation of events for the media; guest appearances and statements; thematic texts; TVC; billboards, posters, leaflets; launch of an online platform; updating provider websites; communication via social networks; pop-up stands; user satisfaction survey.

The campaign website [www.imaspravo.rs](http://www.imaspravo.rs) has been launched, which offers all key information on the right to free legal aid in the most effective way. All local government units and city municipalities have taken an active part in the implementation of the campaign, including by placing a link to the campaign website [www.imaspravo.rs](http://www.imaspravo.rs) on their official websites, in order to raise citizens' awareness of the opportunities provided by the Law on Free Legal Aid. This was done by optimising the banner "You have the right!", which proved to be the fastest and most effective way to obtain complete information on the right to free legal aid.

Starting from 1 November 2024, advertisements are broadcast on television channels with national coverage, as well as on certain local media. Broadcasting was most frequent on the following television channels: RTV1 (104 broadcasts), Happy TV (95 broadcasts), RTS 1 (32 broadcasts), TV Prva (18 broadcasts). The total number of broadcasts of the items is 254 as of 23 December 2024, for a total duration of 5 hours, 41 minutes and 8 seconds.

The Centre for the Protection of Victims of Human Trafficking provides various services and assistance in the context of access to justice, which includes a wide range of activities – hiring lawyers, preparing for testimony, requesting the status of a particularly sensitive witness, sending findings and opinions to prosecutors' offices and courts, with a detailed description and interpretation of the human trafficking situation, organising transportation and escorting victims when going to prosecutors' offices and courts.

In the period from 2022 to July 2025, due to limited funds, a specialised lawyer was occasionally engaged to provide legal aid services. The lawyer was engaged on the basis of a contract concluded between the Centre for the Protection of Victims of Human Trafficking and the lawyer, whose services were financed from the budget of the Republic of Serbia.

During 2025, the Centre for the Protection of Victims of Human Trafficking hired a specialised lawyer to provide services to victims, who will be available to all users of the Centre by the end of 2025.

- **make efforts to facilitate and guarantee effective access to compensation for victims of THB, and set up a state compensation scheme;**

The procedural authority (public prosecutor or court) is obliged to inform the injured party/victim of the right to file a property claim, which may relate to compensation for damage, return of property and annulment of a certain legal transaction, as well as of the right to submit a proposal and evidence for the realisation of the property claim and to propose interim measures for its security.

Within the framework of the legal regulations in the Republic of Serbia, a victim of human trafficking can exercise the right to compensation in two ways: in criminal and civil proceedings. In most criminal cases, the injured party in the criminal proceedings will be referred to civil proceedings in order to exercise the right to compensation for a property claim.



The decision on the property claim is made by the court. The agreement on the property claim, if submitted, is a mandatory element of the plea agreement. In this regard, the public prosecutor is obliged to invite the authorised claimant of the property claim to submit such a request before concluding the agreement.

The procedural authority may appoint a proxy for a particularly sensitive witness, which represents an additional form of protection, but also assistance when submitting a property claim. The procedural authority is obliged to collect evidence of importance for deciding on a property claim even before it is submitted (Article 256 of the Code of Criminal Procedure).

Given the fact that it can be very difficult for victims of serious crimes to initiate civil proceedings to exercise their right to compensation for damage and that this can lead to their further victimisation, in 2019, a working group of the Supreme Court of Cassation, in cooperation with the OSCE, developed Guidelines for Improving Judicial Practice in Proceedings for Compensation for Victims of Serious Crimes in Criminal Proceedings.<sup>113</sup> The Guidelines were developed in the form of a publication that was presented at several training courses for public prosecutors and judges and have shown significant results in practice.

Namely, shortly after the publication of the Guidelines and the training, the first legally binding verdict was issued, accepting the agreement on the recognition of the criminal offence of human trafficking, which also contains an agreement on a property claim, whereby the defendant is obliged to pay the injured party the amount of RSD 1,117,000.00 (approximately EUR 10,000) in compensation for material and non-material damage.

Following the aforementioned verdict, during the past period, several legally binding convictions for the criminal offence of human trafficking were issued, in which the property claim was decided in criminal proceedings. The verdicts obliged the defendants to pay the injured parties (victims of human trafficking) a certain amount as a property claim, which ranged between RSD 300,000.00 and RSD 800,000.00.

In terms of compensation for damages in civil proceedings, the judgment of the Court of Appeal in Novi Sad Gž 3536/13 is significant for domestic judicial practice, which awarded the victim of human trafficking an amount of RSD 800,000.00 in compensation for non-pecuniary damage due to mental anguish suffered due to violation of honour, reputation, freedoms, personal rights and dignity. In the reasoning of the aforementioned judgment, the court stated, among other things: "...The plaintiff sought and obtained compensation for non-pecuniary damage due to the fear she suffered in connection with the torture she was subjected to by the defendants, who, through forcible, unlawful actions, forced her to engage in prostitution as a minor against her will, which is why she understandably suffered fear for her bodily integrity, which in its intensity and duration justifies the award of compensation for damage."

In recent domestic case law, we have examples from which we see that courts in criminal proceedings have decided on property claims and compensation for material and non-material damage to victims of human trafficking. Thus, by the judgment of the Higher Court in Novi Sad K 152/18, the Plea Agreement with the accused for the crime of trafficking was accepted and the defendant was sentenced for the crime of trafficking in human beings under Article 388, paragraph 6, in conjunction with paragraph 1 of the Criminal Code, to a prison sentence of 5 (five) years and 3 (three) months, while on the basis of Article 258 of the Criminal Procedure Code, the injured party was awarded a property

---

<sup>113</sup> [https://www.vrh.sud.rs/sites/default/files/attachments/smernice%20steta\\_web.pdf](https://www.vrh.sud.rs/sites/default/files/attachments/smernice%20steta_web.pdf)

claim, and the defendant was obliged to pay the injured party N. N. the amount of RSD 1,117,000.00 (one million one hundred and seventeen thousand dinars) in compensation for material and non-material damage.

By the verdict of the High Court in Belgrade K. No. 424/23, dated 30 January 2024, the defendant was convicted of the criminal offence of Trafficking in Human Beings under Art. 388.3 in connection with para. 1 of the Criminal Code to a prison sentence of three years and 8 months and is additionally obliged to pay the injured party RSD 500,000 as a property claim, as well as the costs of the criminal proceedings.

He is accused of using force, deception, abuse of trust and difficult circumstances to recruit and transport the victim for the purpose of prostitution. He beat the victim and gave her drugs and alcohol in order to force her to engage in prostitution.

We would also like to point out the above-mentioned example from the recent practice of the Higher Court in Niš, where persons convicted by judgments based on plea agreements are also obliged to pay the appropriate amounts in respect of property claims (Spk. 29/2024, Spk. 19/2024 and Spk 9/2024). Two defendants are obliged to pay RSD 300,000 each and one RSD 500,000. See more details about these subjects in the answer to question 37.

➤ **strengthen the criminal justice response to THB;**

The Judicial Academy, in accordance with the obligations undertaken in the Action Plan for Combating Human Trafficking and in accordance with material and human resources, designs and implements activities aimed at fulfilling the plan. In the period from 2022 to August 2025, the following activities were implemented: Implementation of the principle of impunity for victims of human trafficking – a total of 5 trainings were held with a total of 138 participants, which included public prosecutors, judges, judicial and prosecutorial assistants as the target group. Prevention and suppression of human trafficking for the purpose of labour exploitation and forced labour – a multi-sectoral approach – one seminar was held for judges of higher courts and public prosecutors (a total of 9 participants). Protection of victims of human trafficking during criminal proceedings – 4 trainings were held for a total of 47 participants, including judges, public prosecutors, lawyers, representatives of social work centres as the target group HELP course on the topic of Suppression and Combating Human Trafficking – a total of 19 judges and public prosecutors successfully completed the online training A specialist training programme has been created for public prosecutors and contact persons for handling cases. The implementation of the first trainings is planned for October and November 2025. The plan is also to create online trainings on the topic of human trafficking that would be available on the distance learning platform of the Judicial Academy as permanently accessible material to a wider circle of participants.

We note that the Republic of Serbia, in July 2025, referred in detail to the issue related to the criminal justice response to human trafficking.

➤ **ensure the protection of the private life and identity of victims of trafficking;**

In accordance with the Law on Social Protection, the user has the right to confidentiality of all personal data from the documentation processed for the purposes of reporting, i.e., for records, including those concerning his personality, behaviour, family circumstances and the way he uses the services. The user's right to confidentiality of data may be waived only in cases provided for by law.

Regarding this question, see the answer to questions no. 27, 28 and 36.

➤ **intensify efforts to prevent and combat THB for the purpose of labour exploitation;**

Within the Ministry of Labour, Employment, Veteran and Social Affairs, there is a Labour Inspectorate, which, within its competence, in order to prevent human trafficking for the purpose of labour exploitation, recognizes indicators of labour exploitation, collects information, coordinates with other institutions and exchanges experiences with stakeholders and participates in preventive activities.

The Guide for Labour Inspectors on the Detection and Preliminary Identification of Victims of Human Trafficking,<sup>114</sup> which was developed within the framework of the joint programme of the European Union and the Council of Europe “Horizontal Support Programme for the Western Balkans and Turkey”, in which the Labour Inspectorate has been involved since the beginning of its implementation, is very important for the Labour Inspectorate.

Labour inspectors have acquired the knowledge to effectively detect, preliminarily identify, and appropriately refer victims of human trafficking for the purpose of labour exploitation, as well as to exchange information in a timely and adequate manner.

In order to strengthen the capacity of labour inspectors to actively engage in the prevention of human trafficking and to ensure that their mandate includes a specific focus on identifying potential victims of human trafficking for the purpose of labour exploitation, during 2024, 100 labour inspectors received training in recognising cases of human trafficking, 5 contact persons were appointed to handle cases of suspected human trafficking, while around 266 labour inspectors participated in various trainings and educations.

During 2024, Labour Inspectors, in cooperation with the Ministry of the Interior, carried out 5 targeted inspections in risky activities (construction). During 2023, 251 inspections were carried out, during which 7,781 foreign workers were found, of which 867 without a work permit, 450 workers were working “undeclared”. 187 requests for misdemeanour proceedings were filed, 3 criminal charges were filed and several measures were adopted to eliminate irregularities. Also, within their jurisdiction, labour inspectors also controlled employers who hire seasonal workers. Out of 632 seasonal workers, 503 were foreigners, and 9 requests for initiating misdemeanour proceedings were filed and work ban measures were adopted.

Also, the Market Inspectorate, which exercises its jurisdiction within the Ministry of Internal and Foreign Trade, carried out 11 inspections and issued 14 decisions prohibiting work or advertising in 2024. Seven misdemeanour charges were filed against unregistered entities. Cases of job advertising by persons without a license, including foreign citizens, were processed. Also, the Market Inspectorate actively conducts online investigations and cooperates with civil society organisations.

➤ **improve the assistance provided to victims of trafficking, in particular by guaranteeing the availability of appropriate and safe accommodation for all victims of trafficking, including men and children.**

The Centre for the Protection of Victims of Human Trafficking provides accommodation services in the Shelter for Victims of Human Trafficking, which is the only shelter of its kind in Serbia and

---

<sup>114</sup> [https://www.minrzs.gov.rs/sites/default/files/2018-11/vodic\\_z\\_a\\_inspektore\\_rada\\_o\\_detekciji\\_i\\_preliminarnoj\\_identifikaciji\\_zrta...\\_1\\_.pdf](https://www.minrzs.gov.rs/sites/default/files/2018-11/vodic_z_a_inspektore_rada_o_detekciji_i_preliminarnoj_identifikaciji_zrta..._1_.pdf)

operates according to a unique system of support for victims who are at high risk. The female beneficiaries are provided with an intensive support programme, which involves going through 3 phases of work, a large number of activities aimed at their safety, recovery and empowerment, and the 24-hour presence of professional workers, who are trained, educated and sensitised to work with people who have survived traumatic experiences. The shelter was licensed by the Ministry of Labour, Employment, Veteran and Social Affairs in February 2022 for a period of 5 years. The shelter is available 24 hours a day to receive victims, and support and assistance from professional workers to service female beneficiaries is available 24/7 every day.

During 2022, eight beneficiaries were accommodated in the Shelter, in 2023 14 beneficiaries, in 2024 16 beneficiaries, and in the first half of 2025 eight beneficiaries.

Based on the Conclusion of the Government of the Republic of Serbia from July 2025, the Ministry of Labour, Employment, Veteran and Social Affairs was designated as the user of real estate in Belgrade in order to provide the space necessary for the work of the Centre for the Protection of Victims of Human Trafficking. In accordance with the Conclusion, the Republic Property Directorate of the Republic of Serbia allocated a dedicated apartment for accommodation services for men. The implementation of the conditions for providing accommodation to male victims of human trafficking is underway.

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

➤ **emerging trends of trafficking in human beings;**

The Ministry of the Interior indicated new trends in human trafficking through assumptions about future developments when drafting the Organised and Serious Crime Threat Assessment (SOKTA 2023). During 2023, 2024 and 2025, the following trends were observed:

- sexual exploitation is advertised on social networks and portals. In the same way, without direct or telephone contact, the place, time and price of sexual intercourse are agreed upon,
- promoting activities that hide prostitution and/or labour and sexual exploitation is increasingly an integral part of social networks, as well as the media,
- taking into account the facilitated entry into Serbia of citizens from the South American continent (Brazil, Cuba, Venezuela, Bolivia), as well as from parts of the Asian continent (China, Vietnam, Thailand), there has been a greater presence of citizens of the aforementioned countries, with the assumption that they were recruited for the purpose of sexual exploitation (in the form of so-called high-level prostitution) by members of criminal groups operating abroad and using the so-called e-pimping or e-pimping modus operandi,
- as the Serbian labour market has undergone changes due to the outflow of labour abroad, as well as the lack of certain profiles in the field of crafts, two parallel processes have occurred – improving conditions for workers whose professions are in high demand and low supply, and importing labour from other countries, especially from Asian countries (India, Bangladesh, Turkey, Nepal, Uzbekistan, Vietnam, etc.). Labour exploitation poses a challenge for conducting criminal investigations and identifying victims of human trafficking due to the still unclear boundaries between the so-called undeclared work (i.e., violation of working conditions) and human trafficking for the purpose of labour exploitation.

➤ **the legislation and regulations relevant to action against THB;**

The Council for Combating Human Trafficking, at its session held on 25 December 2023, with the aim of improving operational, institutional and strategic capacities for a systemic response of society to the problem of human trafficking in the Republic of Serbia, adopted measures related to the development of a new planning document in the field of combating human trafficking with an accompanying action plan and the development of laws in the field of combating human trafficking.

In accordance with the measure of the Council for Combating Human Trafficking, at the Government session on 20 March 2024, the Programme for Combating Human Trafficking in the Republic of Serbia for the period 2024-2029 was adopted, with the accompanying Action Plan for the period 2024-2026. The key reform activity defined by the Programme is the adoption of a special law that will regulate the area of human trafficking in a systematic and comprehensive manner.

By the resolution of the Minister of the Interior in 2024, a Working Group was established to draft a law in the area of combating human trafficking. Members of the Working Group are representatives of the Ministry of the Interior (Office for Coordination of Activities in the Fight against Trafficking in Human Beings, Criminal Police Directorate, Border Police Directorate and Secretariat), Ministry of Justice, Supreme Public Prosecutor's Office, Court of Appeal for Minor Offences, Supreme Court, Administrative Court, Commissariat for Refugees and Migration, Ombudsman, Ministry of European Integration, Ministry of Labour, Employment, Veteran and Social Affairs, Centre for the Protection of Victims of Trafficking in Human Beings, Ministry of Education, Ministry of Health, Faculty of Law, University of Novi Sad, Higher Court in Belgrade, as well as five civil society organisations selected within the framework of a public call conducted by the Ministry of Human and Minority Rights and Social Dialogue in cooperation with the Ministry of the Interior: ASTRA from Belgrade, Atina from Belgrade, "The World of Words" (*Svet reči*) from Velika Plana, "Freedom is Priceless" (*Sloboda nema cenu*) from Novi Sad and the Centre for Girls from Niš. Also, in accordance with the decision, representatives of other state bodies, organisations, international organisations, donors, etc. whose work is related to the prevention and fight against human trafficking were invited and included in the work of the Working Group. The working group held 13 one-day meetings, one three-day workshop and a large number of internal consultations.

During the work on the Draft Law, the Spanish model of law was taken into account as a reference at the level of a European Union member state, the Finnish model of the organisational structure used for the purpose of implementing the Law, with a comparison with the Spanish model of organisation and the Croatian model of organisation (due to the legal heritage originating from the SFRY). A domestic expert from the Faculty of Law of the University of Novi Sad and an independent expert from the Republic of Croatia were engaged.

The Republic of Serbia has opted for the so-called "Social Path", in which the process of identification and assistance for victims of human trafficking involves granting victim status, for the purpose of providing long-term assistance, and which is implemented by competent social protection entities and associations.

The draft law transposes the provisions of Directive 2011/36 of the European Parliament and of the Council on preventing and combating trafficking in human beings and protecting its victims and Directive 2024/1712 amending Directive 2011/36, except for the part relating to criminal offences and sanctions, which is transposed during the preparation of amendments to the Criminal Procedure Code and the Criminal Code.

A public debate on the Draft Law on Preventing and Combating Trafficking in Human Beings and Protecting Victims was held from 22 May to 10 June 2025, after which the text of the Draft Law was

harmonised with the submitted comments. An independent expert also submitted comments with recommendations on the Draft Law, which were integrated into the text of the Draft Law.

The agreed text of the Draft Law on Preventing and Combating Trafficking in Human Beings and Protecting Victims has been submitted to the European Commission for its opinion.

In February 2022, by the conclusion of the Government of the Republic of Serbia No. 560-8262/2022-2, the General Protocol for the Protection of Children from Violence was adopted, the provisions of which apply to all children who may be actual or potential victims of all forms of violence.

The General Protocol regulates the procedures for intersectoral action by competent state bodies in the process of protecting children from violence. Competent state bodies and other legal entities whose activities involve working with children are obliged to adopt their own special protocols in accordance with the General Protocol. The General Protocol provides definitions that cover various forms of violence against children, one of which also refers to the exploitation of children.

“Child exploitation means the use of a child for work or other activities for the benefit of others. These activities are likely to impair the child’s physical or mental health, education, moral or social and emotional development (WHO, 1999). The following acts constitute child exploitation:

- 1) Preventing child trafficking
- 2) Exploitation of a child for begging
- 3) Exploitation of a child for prostitution
- 4) Exploitation of a child for pornography
- 5) Abuse of child labour
- 6) Child trafficking for adoption
- 7) Use of a child for medical or scientific purposes
- 8) Social exploitation of a child”

In addition to the General Protocol, the Ministry of the Interior also uses the following binding, instructive acts to prevent and protect children from human trafficking:

- Special protocol on the conduct of police officers to protect minors from abuse and neglect
- Memorandum of Understanding between the Ministry of the Interior and the Amber Alert Europe Foundation
- Mandatory instructions for dealing with victims when informing and assessing the risk of vulnerability and the need for protection and support measures<sup>115</sup>
- Instructions on the conduct of police officers and criteria for urgent notification to the public about the disappearance of a minor (digital platform “Find Me”).<sup>116</sup>

➤ **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);**

<sup>115</sup> Adopted in accordance with the Action Plan for the Implementation of the National Strategy for the Realization of the Rights of Victims and Witnesses of Criminal Offences in the Republic of Serbia (2020-2025). In the organisational units of the Ministry, 63 police officers have been designated as contact points and replacement contact points for changing the Instruction. The right to information and provision of support and assistance to a minor is prescribed, which is carried out in the presence of parents or other legal representatives, except in cases where these persons are prevented from attending, when the presence of a representative of the guardianship authority - the CSR will be ensured instead (point 8). An integral part of the instruction is an information brochure on the rights of injured adults and minors in criminal proceedings.

<sup>116</sup> Urgent notification of the public about the disappearance of a minor – posting a notification on the “Find Me” platform for its urgent publication. When the system is activated: Disappearance related to the commission of a criminal offence (Kidnapping, Human Trafficking ...); Disappearance not related to the commission of a criminal offence (child under seven years of age, child under 18 years of age with developmental disabilities or disabilities, child not at home, at school, circumstances of disappearance indicate a potential danger to life).

By the Government Resolution of 6 September 2023, the National Coordinator for Combating Human Trafficking was appointed, who is also the head of the Office for Coordination of Activities in Combating Human Trafficking, in the Police Directorate of the Ministry of the Interior of the Republic of Serbia.

By the decision of the Government of the Republic of Serbia of 20 July 2023, the Council for Combating Trafficking in Human Beings was established in a new convocation, chaired by the Minister of the Interior, while the members of the Council are the Minister of Labour, Employment, Veteran and Social Affairs, the Minister of Health, the Minister of Finance, the Minister of Justice and the Minister of European Integration. The Council in the aforementioned convocation held one session, in December 2023, at which a proposal for measures related to the development and adoption of a new planning document in the field of combating trafficking in human beings and the development of a law in the field of combating trafficking in human beings was adopted, the aim of which is to regulate this area in a systematic and unified manner.

By the decision of the Government of the Republic of Serbia of 21 November 2024, the Council for Combating Human Trafficking was established in a new convocation, chaired by the Minister of the Interior, while the members of the Council are the Minister of Justice, the Minister of Finance, the Minister of Labour, Employment, Veteran and Social Affairs, the Minister of Health, the Minister of European Integration and the Minister of Education.

Also, by the Decision of the Government of the Republic of Serbia of 24.07.2025., the Council for the Fight against Human Trafficking was established in a new convocation, chaired by the Minister of the Interior, while the members of the Council are the Minister of Justice, the Minister of Finance, the Minister of Labour, Employment, Veteran and Social Affairs, the Minister of Health, the Minister of European Integration and the Minister of Education.

In order to develop a new planning document with an action plan (for the period 2024-2029 and ap 2024-2026) in the field of human trafficking, on 14 August 2023, by a Decision of the Minister of the Interior, an interdepartmental working group was established to develop a Draft of a New Planning Document with an Accompanying Action Plan, chaired by the Head of the Office for Coordination of Activities in the Fight against Human Trafficking. The working group consisted of thirty representatives of state bodies, organisations and institutions, as well as six civil society organisations (ASTRA from Belgrade, Atina from Belgrade, Group 484 from Belgrade, Centre for Girls from Niš, Roma Centre for Democracy from Vranje and the Bureau for Combating Human Trafficking from Belgrade). Civil society organisations were selected by the decision of the Commission for the Selection of Civil Society Organisations for membership in the Working Group for the Development of the Planning Document, based on a public call announced by the Ministry of Human and Minority Rights and Social Dialogue. Also, in cooperation with the International Organisation for Migration – IOM, an expert was selected to participate in the development of the planning document. A Draft Planning Document for the Fight against Human Trafficking with an accompanying Action Plan was developed, which was adopted by the members of the Working Group at a meeting in December 2023, after which the e-consultation process was initiated. The public discussion was held in the period 29 January to 19 February 2024, after which the comments were integrated into the planning document. The Government of the Republic of Serbia, at its session held on 20 March 2024, adopted the Programme with the accompanying Action Plan.

After the adoption of the Programme, a Special Working Group was formed for the implementation, monitoring, reporting and evaluation of the Programme for Combating Trafficking in Human Beings in the Republic of Serbia, which held two working meetings. At the second meeting, the Report on the

Implementation of the Action Plan for the Implementation of the Programme for Combating Trafficking in Human Beings in the Republic of Serbia for 2024 was adopted. Within the framework of the Action Plan, 95% of the activities planned for 2024 were implemented.

By the resolution of the Minister of the Interior in 2024, a Working Group was established to draft a law in the area of combating human trafficking. Members of the Working Group are representatives of the Ministry of the Interior (Office for Coordination of Activities in the Fight against Trafficking in Human Beings, Criminal Police Directorate, Border Police Directorate and Secretariat), Ministry of Justice, Supreme Public Prosecutor's Office, Court of Appeal for Minor Offences, Supreme Court, Administrative Court, Commissariat for Refugees and Migration, Ombudsman, Ministry of European Integration, Ministry of Labour, Employment, Veteran and Social Affairs, Centre for the Protection of Victims of Trafficking in Human Beings, Ministry of Education, Ministry of Health, Faculty of Law, University of Novi Sad, Higher Court in Belgrade, as well as five civil society organisations selected within the framework of a public call conducted by the Ministry of Human and Minority Rights and Social Dialogue in cooperation with the Ministry of the Interior: ASTRA from Belgrade, Atina from Belgrade, "The World of Words" (*Svet reči*) from Velika Plana, "Freedom is Priceless" (*Sloboda nema cenu*) from Novi Sad and the Centre for Girls from Niš. Also, in accordance with the decision, representatives of other state bodies, organisations, international organisations, donors, etc. whose work is related to the prevention and fight against human trafficking were invited and included in the work of the Working Group. The working group held 13 one-day meetings, one three-day workshop and a large number of internal consultations.

The Ministry of the Interior, Police Directorate, Police Directorate Office, Office for the Coordination of Activities in Combating Human Trafficking has filled the staffing capacity for another position. The Office currently employs four enforcement officers and one manager, who is also the National Coordinator for Combating Human Trafficking.

The position of the National Rapporteur has been strengthened by the establishment of the Department of the National Rapporteur in the field of trafficking in human beings in the Professional Service of the Ombudsman, which has four executive positions, of which the position of Head of the Department has been filled, and the process of hiring three senior advisors is underway.

The Ministry of Labour, Employment, Veteran and Social Affairs provided the formal and material conditions for expanding the staffing capacity of the Centre for the Protection of Victims of Human Trafficking by four new positions in 2023. The Coordination Service received two more professional workers (compared to the previous 3), and the Shelter received one professional worker and one associate.

- **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);**

Bearing in mind the focus of the third round of evaluation of the Convention on access to justice and effective remedies for victims of trafficking in human beings, as well as taking into account the conclusions and proposals contained in Appendix I of the Third Evaluation Report of GRETA on the topics related to the third round of evaluation and the accompanying topics specific to Serbia, as well as the positively assessed measures and progress taken by the Republic of Serbia in the implementation of the Convention, we point out that in order to improve the systemic response of society to the problem of trafficking in human beings in the Republic of Serbia, at the session of the Government of the Republic of Serbia held on 20 March 2024, the Programme for Combating Trafficking in Human



Beings in the Republic of Serbia for the period 2024-2029 (hereinafter referred to as: the Programme) with an Action Plan for its implementation for the period from 2024 until 2026 was adopted (hereinafter referred to as: Action Plan).

The Programme is a cross-sectoral planning document that comprehensively establishes goals and measures for combating human trafficking in the Republic of Serbia. The Programme aims to promote respect for and protection of human rights and ensure a continuous comprehensive response of society to the problem of human trafficking through an improved system of prevention, timely identification, assistance and protection of victims, as well as the suppression of human trafficking.

The Programme has been developed in accordance with the policies pursued by the European Union in the field of combating trafficking in human beings, primarily with Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims and the European Union Anti-Trafficking Strategy for the period from 2021 until 2025. The adoption of the Programme is envisaged as an obligation of the Republic of Serbia in the Revised Action Plan for Chapter 24 – Justice, Freedom, Security, Chapter “Fight against Organised Crime” (activity 6.2.8.7).

The programme envisages four specific objectives that contribute to a more effective suppression of human trafficking through the improvement of the regulatory framework, investigation and prosecution of perpetrators of the crime of human trafficking, whether they are natural or legal persons, with a special focus on a proactive approach, specialisation, strengthening of competencies and expanding the circle of trained subjects for recognising the crime of human trafficking and appropriate action in all aspects of criminal prosecution, as well as access to justice and effective protection of victims of human trafficking in all phases of investigation and criminal prosecution, in order to prevent the exposure of victims of human trafficking to secondary victimisation; achieving a higher level of quality of protection of victims of human trafficking through improving the efficiency of the procedure for identifying victims of human trafficking, both preliminary and formal; raising the level of awareness and knowledge to recognise human trafficking and recognize signs that a specific situation may develop into human trafficking, as well as about available protection options, as well as further developing a system that will respond to the specific requirements of preventing and combating human trafficking for the purpose of labour exploitation; continuing to strengthen partnerships and horizontal and vertical linkages in responding to human trafficking at the local, national and international levels, through ensuring intensive cooperation between state bodies, organisations and institutions with local self-government bodies, civil society organisations, the academic community, international partners and all stakeholders.

A total of 95% of the activities planned to be implemented in 2024 from the Action Plan for the Implementation of the Programme have been implemented. The report on the implemented activities is available on the website of the Ministry of the Interior.<sup>117</sup>

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

Examples from case law are provided in the answers to questions 32 and 34.

### **Part III – Statistics on THB**

---

<sup>117</sup> <https://www.mup.gov.rs/wps/wcm/connect/db6f4c40-2b1d-4f09-81b0-d1705c7833a7/Izvestaj+AP+za+2024.+godinu++25.02.2025.pdf?MOD=AJPERES&CVID=pAffacR>

**42. Please provide the following statistics, per year starting with 2022, 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 Centre for the Protection of Victims of Human Trafficking was established as an independent social protection institution on 13 April 2012, by a Decision of the Government of the Republic of Serbia, responsible for identifying and coordinating support for victims.

Below we provide statistical data from the Centre for the Protection of Victims of Human Trafficking.

## 2022

*Table: number and structure of applications*

Source of application	Number of applications	Number of applications	Number of applications	Number of applications
	2022	2023	2024	2025
<b>Police Administration</b>	40	66	48	29
<b>Judiciary system</b>	3	5	13	6
<b>Social protection system</b>	28	43	32	10
<b>Centre for Protection of Victims of Human Trafficking – (procedure ex officio)</b>	11	12	21	
<b>NGO</b>	32 <sup>118</sup>	16	54	55
<b>Labour inspectorate</b>	2			1
<b>Education system</b>	10	9	3	1
<b>in person</b>	2	2	3	3
<b>Relative</b>	4	4		3
<b>Other physical persons</b>	2	1	3	12
<b>Protector of Citizens (Ombudsman)</b>	2	6		
<b>Provincial Protector of Citizens (Provincial Ombudsman)</b>	1			
<b>International organisations</b>	1	3	4	1
<b>Commissariat for Refugees and Migrations</b>		1		
<b>Commission for collecting facts on the status of newborn children</b>			3	

<sup>118</sup> Among these reports are 14 reports from the NGO Astra, which did not provide any information that would allow the identity of the alleged victims to be determined, nor to contact them. Even after trying to supplement the report, we did not receive this information, so in these cases it was not possible to carry out identification.

<b>suspected of having disappeared from maternity hospitals in the Republic of Serbia</b>				
<b>Total</b>	<b>138</b>	<b>168</b>	<b>184</b>	<b>121</b>

During 2022, a total of 138 new reports were received, of which 117 were identified, which gave these persons all the rights guaranteed to victims of human trafficking. In 21 cases, the report was rejected because, even after the data completion process, the identity of the alleged victims could not be determined or because it was determined at the outset that there were no elements that would indicate suspicion of human trafficking.

During 2023, 168 reports were received, of which 57 victims of human trafficking were identified (9 were identified based on reports from the previous year). 31 reports were rejected, 10 identification procedures were suspended, 19 persons were not assessed as victims of human trafficking, and the identification procedure for 51 persons continues in 2024.

During 2024, 184 reports were received, of which 61 victims of human trafficking were identified (10 were identified based on reports from the previous year). 35 reports were rejected, 6 identification procedures were suspended or terminated, 45 persons were not assessed as victims of human trafficking, and the identification procedure for 27 persons continues in 2025.

During the first 6 months of 2025, 121 reports were received. 28 victims were identified. More detailed data on the outcomes of work on the reports will be available at the end of the year, given that the proceedings are ongoing.

## IDENTIFIED VICTIMS OF HUMAN TRAFFICKING BY GENDER, AGE AND TYPE OF EXPLOITATION BY YEAR

Type of exploitation 2022	from 20 to 18 years		aged over 18		Total
	f	m	f	m	
Sexual	13	1	20		34
Forced marriage	3		3		6
Work	1		1	2	4
Forced begging	1	3	2	2	8
Multiple	1		3	3	7
Coercion to commit criminal acts	1	1 <sup>119</sup>			2
Economic				1	1
<b>Total</b>	<b>20</b>	<b>5</b>	<b>29</b>	<b>8</b>	<b>62</b>

Type of exploitation 2023	from 20 to 18 years		aged over 18		Total
	f	m	f	m	
Sexual	5		8		13
Forced marriage	5		3		8
Work	3		3	5	11
Forced begging	12	5			17
Multiple	4	2	3	1	10
Coercion to commit criminal acts		5	1	1	7
<b>Total</b>	<b>29</b>	<b>12</b>	<b>18</b>	<b>7</b>	<b>66</b>

Type of exploitation 2024	from 20 to 18 years		aged over 18		Total
	f	m	f	m	
Sexual	8		16		24
Forced marriage	4				4
Work	2	1	6	7	16
Forced begging	7	3	3		13
Multiple	2			1	3
Coercion to commit criminal acts		5		3	8
Participation in military conflict		1			1
Illegal adoption	1	1			2
<b>Total</b>	<b>24</b>	<b>11</b>	<b>25</b>	<b>11</b>	<b>71</b>

Type of exploitation 2025	from 20 to 18 years		aged over 18		Total
	f	m	f	m	
Sexual	4		8		12
Forced marriage					
Work	8			6	14
Forced begging					
Multiple			1		1
Coercion to commit criminal acts		1			1
Economic					
<b>Total</b>	<b>12</b>	<b>1</b>	<b>9</b>	<b>6</b>	<b>28</b>

<sup>119</sup> One victim is re-exploited

**IDENTIFIED VICTIMS OF HUMAN TRAFFICKING BY CITIZENSHIP**

Country of origin	Number of identified victims				TOTAL
	2022	2023	2024	2025	
Serbia	56	60	55	17	188
Bosnia and Herzegovina	1				1
Uganda	1				1
Cameron	2			1	3
Zimbabwe				3	3
Belarus				1	1
Uzbekistan				1	1
Burundi			2		2
Columbia			1		1
Brazil			2		2
DR Congo	1				1
Tunisia	1				1
India		3		5	8
Ukraine		1	2		3
Iran		1			1
Pakistan		1			1
Nigeria			5		5
Russia			1		1
China			2		2
Congo			1		1
<b>TOTAL</b>	<b>62</b>	<b>66</b>	<b>71</b>	<b>28</b>	<b>227</b>

Table: overview of victims of human trafficking by country of exploitation<sup>120</sup> for 2022

Country of origin	Country of exploitation										
	Serbia	Denmark	UAE	Austria	Belgium	Italy	Albania	Switzerland	Türkiye	Greece	Tunisia
Serbia	47	1		2	1	4		1			
Uganda										1	1
Cameron			1				1				
DR Congo										1	
Tunisia											1
Bosnia and Herzegovina	1										

Table: overview of victims of human trafficking by country of exploitation for 2023

<sup>120</sup> One victim is exploited in two countries

Country of origin	Country of exploitation / intentions of exploitation						
	Serbia	Israel	Italy	Montenegro	India	Switzerland	Thailand
Serbia	52	2	1	3		1	1
India	2				1		
Ukraine	1						
Iran	1						
Pakistan	1						

Table: overview of victims of human trafficking by country of exploitation for 2024

Country of origin	Country of exploitation / intentions of exploitation							
	Serbia	Belgium	Bosnia and Herzegovina	Slovenia	Russia	Congo	Croatia	Burundi
Serbia	50	3		1			1	
Ukraine	1		1					
Nigeria	5							
Russia					1			
China	2							
Congo						1		
Burundi								2
Columbia	2							
Brazil	1							

Table: overview of victims of human trafficking by country of exploitation for the period January-July 2025

Country of origin	Country of exploitation / intentions of exploitation							
	Serbia	Cameron						
Serbia	17							
India	5							
Zimbabwe	3							
Belarus	1							
Uzbekistan	1							
Cameron		1						

Table: formally identified victims of human trafficking – foreign citizens by gender, age and type of exploitation for 2022

Type of exploitation	from 20 to 18 years		aged over 18		Total
	f	m	f	m	
Sexual			3		3
Forced marriage			1		1
working	1				1
Forced begging	1				1
Total	2		4		6

Table: formally identified victims of human trafficking – foreign citizens by gender, age and type of exploitation for 2023

Type of exploitation	from 20 to 18 years		aged over 18		Total
	f	m	f	m	
working				2	2
Multiple			1		1
Coercion to commit criminal acts		1	1	1	3
Total		1	2	3	6

Table: formally identified victims of human trafficking – foreign citizens by gender, age and type of exploitation for 2024

Type of exploitation	from 20 to 18 years		aged over 18		Total
	f	m	f	m	
Sexual			7		7
Forced marriage	1				1
working			3	2	5
Coercion to commit criminal acts		1			1
Economic				2	2

Total	1	1	10	4	16
-------	---	---	----	---	----

Table: formally identified victims of human trafficking – foreign citizens by gender, age and type of exploitation for January-July 2025

Type of exploitation	from 20 to 18 years		aged over 18		Total
	f	m	f	m	
Sexual	1				1
working			4	6	10
Total	1		4	6	11

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

- 2022 – there were no persons granted refugee/subsidiary protection status based on belonging to a social group – victims of human trafficking;
- 2023 – 1 (one) adult citizen of India was granted refugee status, based on belonging to a social group – a victim of human trafficking (sexual and labour exploitation);
- 2024 – 1 (one) adult female citizen of the Democratic Republic of the Congo and 1 (one) adult female citizen of Ukraine were granted refugee status, based on belonging to a social group – victims of human trafficking (sexual exploitation) and
- by 31 July 2025 – 1 (one) minor citizen of Cameroon was granted refugee status, based on belonging to a social group – a victim of human trafficking (sexual exploitation).

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

All identified victims of human trafficking were provided with assistance and support, including 353 services in 2022, 373 services in 2023, 537 services in 2024, and 296 services in the period January – July 2025.

➤ **Number of child victims of THB who were appointed legal guardians.**

A minor is a beneficiary of the social protection system when, due to family and other life circumstances, their health, safety and development are at risk, or if it is certain that without the support of the social protection system, they cannot reach an optimal level of development. The appointment of a legal guardian is within the competence of the Ministry of Family Care and Demography, in accordance with the Family Law, or the social work centres as the guardianship authority. According to the Report of the Republic Institute for Social Protection from 2022, the share of beneficiary groups of children in the total number of children registered with social work centres in 2022, which refers to the total number of children victims of trafficking, is 0.1%.

The Republic Institute for Social Protection is responsible for monitoring the social protection system, according to the Law on Social Protection. According to the Decision on the Official Statistics Programme for the period from 2021 to 2025, i.e., the Law on Official Statistics, it is designated as the responsible producer of statistics.



According to their official statistics, the report on the work of the Social Protection Centre was compiled based on individual statistical reports on the work of 170 departments of social work centres collected using the reporting method based on a questionnaire from the Republic Institute for Social Protection. Considering that the unified information system for recording and entering data of social protection institutions – SOZIS, began operating in 2022 and that data migration is ongoing, official data were published in 2023, which refers to 2022, and are available on the website of the Republic Institute for Social Protection.<sup>121</sup>

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

By notifying the Ministry of the Interior of the initiation of the procedure for assessing the condition and needs of the victim, as well as the identification of the victim by the competent state body for the identification and coordination of the protection of victims of human trafficking, the conditions are met for granting temporary residence to a foreigner who is presumed to be a victim of human trafficking, as prescribed by the provision of Article 62 of the Law on Foreigners. During the temporary stay, recovery and elimination of possible further influence of the perpetrator of the criminal act on the victim are enabled, as well as the possibility to, based on timely and complete information about their status, independently, without being conditioned to testify, make a decision on further cooperation with the competent state body for the identification and coordination of the protection of victims of human trafficking, the court, the prosecutor's office or the police.

- During 2022, 1 temporary residence permit was approved for a foreigner who is presumed to be a victim of human trafficking,
- During 2023, there were no approved stays for a foreigner presumed to be a victim of human trafficking,
- During 2024, 5 temporary residence permits were granted to foreigners presumed to be victims of human trafficking, citizens of Nigeria, of whom 2 were male and 3 were female,
- - In the period 01.01-31.07.2025, 3 residence permits were approved for a foreigner presumed to be a victim of human trafficking, of which 1 was a citizen of Uzbekistan and 2 were citizens of Zimbabwe.

➤ **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).**

During 2022 and 2023, there were no approved stays for foreigners who are victims of human trafficking, as prescribed by Article 63 of the Law on Foreigners.

At the end of 2024, 7 foreign citizens were residing in the Republic of Serbia with approved temporary residence permits for victims of human trafficking, namely: 5 citizens of Nigeria, and 2 citizens of the People's Republic of China. Of the above number, 5 Nigerian citizens were first granted a temporary residence permit for a foreigner presumed to be a victim of human trafficking, as prescribed by Article 62 of the Law on Foreigners, and upon expiration, the temporary residence permit was extended pursuant to Article 63 of the Law on Foreigners – for victims of human trafficking.

➤ **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).**

<sup>121</sup> <https://www.zavodsz.gov.rs/%D0%B8%D0%B7%D0%B2%D0%B5%D1%88%D1%82%D0%B0%D1%98%D0%B8-%D0%B8%D0%B7-%D1%81%D0%B8%D1%81%D1%82%D0%B5%D0%BC%D0%B0%D0%B8%D0%B7%D0%B2%D0%B5%D1%88%D1%82%D0%B0%D1%98%D0%B8-%D0%B8%D0%B7-%D1%81%D0%B8%D1%81%D1%82%D0%B5%D0%BC%D0%B0-2023/>

In the procedures for granting and terminating the right to asylum, the procedure is led and all decisions are made by the Asylum Office, an organizational unit of the Ministry of the Interior responsible for asylum affairs.

- 2022 – there were no persons granted refugee/subsidiary protection status based on belonging to a social group – victims of human trafficking;
- 2023 – 1 (one) adult citizen of India was granted refugee status, based on belonging to a social group – a victim of human trafficking (sexual and labour exploitation);
- 2024 – 1 (one) adult female citizen of the Democratic Republic of the Congo and 1 (one) adult female citizen of Ukraine were granted refugee status, based on belonging to a social group – victims of human trafficking (sexual exploitation) and
- by 31 July 2025 – 1 (one) minor citizen of Cameroon was granted refugee status, based on belonging to a social group – a victim of human trafficking (sexual exploitation).

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

The Supreme Court does not have these statistical data.

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

We do not have this data.

- **Number of victims of THB who received free legal aid.**

The question about free legal aid is referred to in question number 40.

- **Number of victims of THB who were returned or repatriated to/from your country (disaggregated by sex, age, country of destination, form of exploitation).**

Support for voluntary return was provided in 2022 for 4 victims of human trafficking, in 2023 for 4 victims, in 2024 for 8 victims, and during 2025 for one victim.

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

In the period from 1 January 2022 to 31 July 2025, investigations were conducted against a total of 293 persons for committing the criminal offence of human trafficking to the detriment of 223 victims, classified by form of exploitation:

- against 188 persons for trafficking in human beings for the purpose of prostitution or other types of sexual exploitation or use for pornographic purposes, to the detriment of 122 victims,
- against 51 persons for trafficking in human beings for the purpose of labour exploitation, forced labour, establishing a slave or similar relationship, to the detriment of 39 victims,
- against 30 persons for human trafficking for the purpose of begging, to the detriment of 34 victims,
- against 24 persons for trafficking in human beings for the purpose of committing a criminal offence, to the detriment of 28 victims.

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

In the period from 01.01.2022 to 31.07.2025, a total of 109 persons were charged with committing the criminal offence of human trafficking to the detriment of 94 victims, classified by form of exploitation:

- against 75 persons for trafficking in human beings for the purpose of prostitution or other types of sexual exploitation or use for pornographic purposes, to the detriment of 54 victims,
  - against 15 persons for trafficking in human beings for the purpose of labour exploitation, forced labour, establishing a slave or similar relationship, to the detriment of 14 victims,
  - against 13 persons for trafficking in human beings for the purpose of committing a criminal offence, to the detriment of 14 victims.
  - against 6 persons for human trafficking for the purpose of begging, to the detriment of 12 victims.
- **Number of convicted perpetrators of THB (disaggregated by sex, age, nationality, form of exploitation).**

The requested data is not part of the statistical reporting of courts in accordance with the Court Rules.<sup>122</sup> The requested statistical data for 2022, 2023 and 2024 were obtained from the competent courts on an ad hoc basis, considering judgments that entered into force in the observed year.

According to the information received, in 2022, there were 11 convicted persons (all citizens of the Republic of Serbia). According to the type of exploitation, they were convicted in 8 cases for prostitution, sexual exploitation and use for pornographic purposes, in one case for establishing a slave or similar position, in 2 cases for begging. All were sentenced to prison terms. 13 defendants were male, and 1 was female. All defendants for the criminal offence under Article 388 were adults. Three persons were acquitted.

According to the information received, in 2023, there were a total of 23 convicted persons (citizens of the Republic of Serbia, 1 German citizen). According to the type of exploitation, they were convicted in 14 cases for prostitution, sexual exploitation and use for pornographic purposes, in 2 cases for establishing a slave or similar position, in 1 case for begging, in 4 cases for labour exploitation, and in 2 cases for committing criminal offences. 19 persons were sentenced to prison sentences. 17 defendants were male, and 7 was female. All defendants for the criminal offence under Article 388 were adults. 1 defendant was acquitted.

According to the information received, in 2024, there were 19 convicted persons (all citizens of the Republic of Serbia). According to the type of exploitation, they were convicted in 13 cases for prostitution, sexual exploitation and use for pornographic purposes, in 1 cases for establishing a slave or similar position, in 1 case for begging, in 4 cases for labour exploitation, and in 4 cases for committing criminal offences. 19 persons were sentenced to prison sentences. 17 defendants were male, and 3 was female. All defendants for the criminal offence under Article 388 were adults. 1 defendant was acquitted.

- **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.**

In 2022, 8 final convictions were issued, 3 victims were male, 4 victims were female, 1 adult, 6 minors, the forms of exploitation and sentences are listed above. There were no suspended sentences.

In 2023, 11 final judgments were issued, 44 male victims, 15 female victims, 14 minors. The forms of exploitation and sentences are listed above. There were no suspended sentences.

<sup>122</sup> See the Annual Report on Work of the Courts in the Republic of Serbia, also available in English (<https://www.vrh.sud.rs/sites/default/files/attachments/ANNUAL%20REPORT%20ON%20THE%20WORK%20OF%20THE%20COURTS%20IN%20THE%20REPUBLIC%20OF%20SERBIA%20FOR%202024.pdf>)

In 2024, 13 final judgments were issued against 5 male victims and 19 female victims. 14 victims were minors. The forms of exploitation and sentences are listed above. There were no suspended sentences.

➤ **Number of judgments in THB cases resulting in the confiscation of assets.**

There are no precise data on confiscated property benefits, since the required statistical data are not collected. However, we note that the Criminal Code stipulates that no one may retain property benefits obtained through a criminal offence (Article 91 of the Criminal Code). Also, Article 92 stipulates the conditions and manner of confiscating property benefits. Money, valuables and any other property benefits obtained through a criminal offence shall be confiscated from the perpetrator, and if confiscation is not possible, the perpetrator shall be obliged to pay a monetary amount corresponding to the acquired property benefits (paragraph 1). Additionally, a security measure of confiscation of an object that was intended or used for the commission of a criminal offence or was created by the commission of a criminal offence may be determined when there is a danger that a certain object will be used again to commit a criminal offence or when the confiscation of the object is necessary for the protection of public safety or for moral reasons (Article 87 of the Criminal Code, paragraph 1).

According to available data in accordance with Articles 91 and 92 of the Criminal Code, in 2024, property gains were confiscated in 3 cases.

➤ **Number of convictions of legal entities for THB.**

According to available data, no proceedings have been initiated against legal entities.