

**G R E T A**

Group of Experts on Action  
against Trafficking in Human Beings

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Reply from Slovenia  
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 24 October 2025

Questionnaire adopted by the Group of Experts on Action against  
Trafficking in Human Beings (GRETA) on 30 June 2023

## 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)

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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?

There is no specific research on the vulnerability of individuals to human trafficking in Slovenia. However, there are other important studies on vulnerability in the context of domestic violence, gender, mental health and disability, poverty, migration, minority status and similar issues, which also help the Interministerial Working Group for Combating Trafficking in Human Beings (hereinafter: MDS TZL) to identify vulnerable groups for trafficking in human beings and to adopt appropriate measures to protect them.

The Action Plan to Combat Trafficking in Human Beings for the period 2025 and 2026<sup>4</sup> addresses especially the following risk groups in terms of preventive activities: migrants, applicants for temporary protection, applicants for international protection with a special focus on unaccompanied minors and single women, children and minors, the Roma community and persons with disabilities.

Slovenia has not defined any geographical regions in terms of risk for human trafficking. However, in the economic sector, the industries with the highest risk of human trafficking are freight transport, construction, agriculture, hospitality and tourism.

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);

In 2024, the Republic of Slovenia adopted the Resolution on the National Programme for the Prevention of Domestic Violence and Violence against Women 2024–2029, which also includes measures in the area of forced child marriages, such as:

1. diversifying and strengthening psychosocial support programmes for children and youth who are victims of domestic violence (including forced marriages);
2. further strengthening of inter-institutional cooperation and promoting awareness of institutions about the phenomenon of minors running away into harmful environments, as well as of early and forced marriages in the Roma community, along with the adoption of appropriate measures in such cases and raising awareness within the Roma community about the harmful effects of these practices;
3. re-examination of the Criminal Code (hereinafter: KZ-1) to ensure further alignment with the Istanbul Convention, addressing issues such as forced marriages.
4. implementation of a survey to assess the current situation regarding early and forced marriages, which will provide a basis for further action.

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<sup>4</sup> Available at <https://www.gov.si/zbirke/delovna-telesa/medresorska-delovna-skupina-za-boj-proti-trgovini-z-ljudmi/> (Slovenian language) and <https://www.gov.si/en/registries/working-bodies/the-national-working-group-for-combating-trafficking-in-human-being/> (English).

The measures will have been implemented by the end of 2029.

Slovenia is also preparing a new National Programme for Children 2026-2031, which will include seven priority areas, including "Equal opportunities for all children and prevention of discrimination". The government must ensure equal opportunities and the comprehensive development of all children, regardless of their personal circumstances. Special attention will be paid to children with a migrant background and those belonging to ethnic or national minorities, such as Roma children. Children, especially unaccompanied minors, are increasingly exposed to the risk of exploitation and trafficking. The new programme will address girls from these vulnerable groups who face particular risks due to discrimination, gender-based violence and sexual exploitation.

The Government Office for National Minorities has organised several events concerning early and forced marriages in the Roma community as part of the SIFOROMA6 project, which runs from 2023 to 2025 and is funded by the European Union's CERV (Citizens, Equality, Rights & Values) programme. The project aims to strengthen the integration of the Roma community into social and political life and to improve the implementation of policies related to the Roma. Numerous activities were carried out as part of the project, including professional training, consultations and evaluation events, which contributed to greater awareness, improved stakeholder cooperation, and strengthened capacities for more effective implementation of objectives in the areas of equality, non-discrimination and participation of the Roma community. For more information on the activities carried out under the SIFOROMA6 project, see point 4.

The Ministry of Labour, Family, Social Affairs and Equal Opportunities (hereinafter: MDDSZ) co-financed various projects by non-governmental organisations in the period 2022-2025, which also addressed the issue of abuse of vulnerable persons. In 2023, the Ključ Association – Centre for Combating Trafficking in Human Beings carried out the **KLJUČno** za lajf (Key for Life) project, which targeted young people throughout Slovenia. Discussion sessions addressed topics such as non-violent relationships, safe and consensual sexual behaviour, safe nightlife for young people, and the development of skills to set and respect personal boundaries. As part of the project, young people acquired knowledge and skills that will enable them to recognise various forms of violence and abuse, including online abuse, and to protect themselves and seek assistance.

On 12 October 2023, the Government of the Republic of Slovenia published in the Official Gazette of the Republic of Slovenia the Regulation on the provision of appropriate accommodation, care and treatment of unaccompanied minors (hereinafter: the Regulation). Article 3 of the Regulation establishes the following accommodation capacities for unaccompanied minors:

- reception centre for unaccompanied minors;
- accommodation unit for unaccompanied minors;
- youth apartment for unaccompanied minors.

The reception centre and the accommodation unit accommodate unaccompanied minors who made an application for international protection, who are applicants for international protection or persons granted international protection under the International Protection Act (Official Gazette of the Republic of Slovenia, No. 16/17 – official consolidated text, 54/21 and 42/23 – ZZSDT-D), applicants for temporary protection and persons granted temporary protection under the Temporary Protection of Displaced Persons Act (Official Gazette of the Republic of Slovenia, No. 16/17 – official consolidated text and 22/25 – ZZZRO-1), and unaccompanied minors who are illegal foreigners under the Foreigners Act (Official Gazette of the Republic of Slovenia, No. 46/25 – official consolidated text, hereinafter: ZTuj-2).

Unaccompanied minors are provided with 24-hour care by qualified professionals. Immediately upon arrival at the reception centre, they are assigned a legal representative or guardian by the competent social services centre.

Every unaccompanied minor is assigned a professional who prepares an individual plan for them. The individual plan takes into account the minor's age and maturity and includes an assessment of their best interests, identifying and addressing their vulnerabilities, and specific needs or risks that may affect the accommodation process or directly threaten their safety and well-being. If an unaccompanied minor with special needs or exposed to risks is identified, they shall be provided appropriate treatment. If a minor is a potential victim of human trafficking, the police shall be contacted immediately and all necessary measures shall be taken to protect the victim.

The individual plan is continuously updated by the assigned professional worker according to the evolving needs and circumstances of the unaccompanied minor. It is drawn up in collaboration with the minor's legal representative or guardian, professional workers in the accommodation facility, the social work centre and other relevant stakeholders. The individual plan is tailored to the minor's age, gender, needs, other circumstances and experiences, as well as their wishes and interests. It includes all relevant information regarding the provision of professional support, care planning, health care, education, vocational pathways, hobbies and interests, as well as a subsequent accommodation plan and the definition of short-term, medium-term and long-term goals regarding the minor.

The reception centre and accommodation unit operate as open facilities, with on-site security provided by a security service. Unaccompanied minors are provided with information about their rights and obligations and about the asylum procedure in Slovenia. This information is also displayed on the notice boards of the accommodation facilities. Upon arrival, unaccompanied minors undergo a health check.

The Office for the Support and Integration of Migrants (hereinafter: UOIM) provides meals to all unaccompanied minors accommodated in the accommodation facilities, regardless of their status. The Office provides clothing, footwear and hygiene and cosmetic supplies to unaccompanied minors who do not have their own means of subsistence in the amount of the basic minimum income, and to those who do not receive pocket money under the Temporary Protection of Displaced Persons Act or financial social assistance under social welfare regulations. Unaccompanied minors who are applicants for international protection or have been granted temporary protection, and who have no income, receive pocket money. Unaccompanied minors (except those who have the status of foreigners) may enter the labour market in Slovenia. They also have the right to access various forms of education. Unaccompanied minors over the age of 16 attend a literacy course. They also have the right to health care, provided on the same basis as for a child who is a Slovenian citizen.

Unaccompanied minors can move freely throughout the territory of Slovenia. If they do not understand the official language, an interpreter for a language they understand is provided as requested by the staff responsible for the exercise of their rights.

Leisure activities in the accommodation unit are provided daily by two non-governmental organisations. Since unaccompanied minors take part in a wide range of educational and recreational activities, and many different actors work with them, there are ample opportunities to identify and protect potential victims. All staff involved are trained and familiar with the protocols to follow if a person is believed to be a victim of violence, abuse or human trafficking.

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

The Ministry of Labour, Family, Social Affairs and Equal Opportunities finances programmes supporting families. These programmes are aimed at children, young people and their families, recognizing that fostering the healthy development of the young generation benefits society as a whole. The programmes are free of charge and widely accessible, and are based on up-to-date concepts of support, assistance and self-help.

Within the framework of the public call for proposals for the financing of family centre programmes for the period 2021-2025, the Ministry of Labour, Family, Social Affairs and Equal Opportunities finances family centres. They promote intergenerational socialising, social roles of individuals, work-life balance, interpersonal and parenting skills, and sharing best practice and positive experience. Family centres provide a space for informal socialising, educational and other workshops to develop good parenting skills, holiday activities for children, workshops for children and youth, and counselling concerning emotional regulation, positive self-image and problem solving, etc. These activities play a crucial role in fostering emotional and other personal competences.

In 2025, based on the Family Code, the Ministry of Labour, Family, Social Affairs and Equal Opportunities implemented a pilot project to finance activities for the quality leisure time of children, aimed at facilitating a better work-life balance. The aim of the public call was to ensure that school-aged children in the first and second educational cycles could spend their free time in a meaningful way. Between 30 June and 29 August 2025, 31 selected providers carried out leisure time activities for children. As part of the programme, the selected providers also carried out activities promoting a healthy lifestyle, developing skills, talents and relaxation techniques adapted to children in the first and second cycles of primary school, as well as encouraging children's free play. Daily snacks and hot meals were also provided.

The Resolution on the 2024–2029 National Programme for the Prevention of Domestic Violence and Violence against Women outlines measures to strengthen the protection of children from online violence, including: 1. implementing regular annual awareness-raising and training courses on cyberviolence against women and children (including how to report violence) for primary and secondary school students; 2. providing regular training and information for teachers on the risks of cyberviolence against children; and 3. raising awareness among parents about the dangers of cyberviolence.

In the 2026–2031 National Programme for Children, one of the priority areas will be "Digital transformation: Safety and protection of children in the digital environment". While it is essential to ensure that all children can fully enjoy their right to participate in the digital environment, it is equally important to ensure their protection and safety online. The programme highlights the need to promote safer and healthier use of digital tools among children and adolescents, with a focus on protecting their mental health. This includes promoting media and digital literacy alongside social and emotional skills, and creating a healthier, safer and age-appropriate digital environment. Achieving these goals requires close cooperation between key stakeholders, including policymakers, local authorities, the digital industry, families, caregivers, educators, healthcare professionals, other adults working with children and youth, and youth themselves.

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

The national e-government portal allows for quick, easy and completely anonymous electronic crime reporting in the areas of sexual violence, domestic violence, corruption, human trafficking, extreme violence and organised crime.

In Slovenia, oversight of all branches of government and of any potential infringements of human rights and fundamental freedoms is carried out by the Human Rights Ombudsman. The Ombudsman's role is not limited to identifying direct violations of constitutionally guaranteed human rights and freedoms but also includes taking action in cases where public authorities infringe upon individuals' rights. The procedure before the Human Rights Ombudsman is informal and free of charge. Both children and adults can turn to the Ombudsman for help or to seek advice regarding their difficulties.

These issues are also addressed by the Council of the Republic of Slovenia for Children and Families, which acts as an advisory body to the government. The Council's responsibilities include the continuous monitoring, analysis and assessment of the situation of children and families, and the ongoing assessment of how children's rights are being implemented. Based on its analyses and assessments, the Council provides the government with expert guidance for the adoption of measures, legislation and strategic documents regarding children and families. It also reviews draft legislation in this area and issues expert opinions. In addition, the Council works to ensure the coordinated action among competent authorities by promoting cooperation between government bodies, professional institutions and non-governmental organisations. Another important role of the Council is to actively monitor the implementation of legislation and measures relating to children and families, including the safety and protection of children in the digital environment and the protection of the most vulnerable groups of children.

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

Based on the 2023-2024 Action Plan to Combat Trafficking in Human Beings, regular training was provided to social work centre staff on how to identify cases of human trafficking. As part of preventive awareness-raising workshops for primary and secondary school students, teachers and school counsellors were also informed about the issue of human trafficking.

In addition, in accordance with the strategic guidelines of the Slovenian Education Institute and relevant legislative and professional frameworks, several activities were planned and implemented in 2024 and early 2025 to address the prevention of sexual violence in the educational settings. Raising awareness of the importance of a safe and supportive learning environment is crucial for the healthy development of children and adolescents, especially in the context of preventing all forms of violence, including sexual violence.

Key activities:

- training programmes for education professionals on identifying and addressing cases of sexual violence (seminars, study meetings);
- support for school counselling services in developing and implementing internal protocols to protect children from violence;
- streamlining violence prevention into various training courses, particularly within the framework of the *School Approach to a Safe and Supportive Learning Environment* project;
- advisory and mentoring assistance in handling specific cases in the school environment;
- preparation and distribution of materials for schools with the aim of raising awareness among teachers, children and parents.

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

Within the framework of a public call for proposals, the Ministry of Labour, Family, Social Affairs and Equal Opportunities co-finances projects that identify the needs of specific vulnerable target groups

within a given geographical area within a geographical unit and offer them appropriate content and activities. These projects are implemented by multigenerational centres (VCG+). Each VCG+ is based in a particular place, but - with the collaboration with project partners- also operates in several other locations in the local community. In smaller municipalities, these centres are closely connected with the local community, which contributes significantly to the better quality of life for residents. VCG+ centres serve as important hubs of social activity and inclusion for various target groups. For children, they offer a range of activities and organised care aimed at ensuring quality leisure time, discovering talents and developing skills in different areas of personal growth. The centres also provide learning support for children and youth.

The Office for National Minorities has adopted the 2021–2030 National Programme of Measures for Roma (NPUR 2021–2030), an important strategic document addressing the multidimensional challenges faced by the Roma community in Slovenia. Its objectives include measures to reduce the vulnerability of persons from marginalised groups, such as:

- improving the socio-economic situation of Roma
- increasing social inclusion and empowerment of within the Roma community,
- strengthening Roma participation in decision-making and policy-making processes,
- achieving equality and full inclusion in society.

The responsible authorities for implementing these measures are the relevant ministries. The implementation of the programme is monitored through annual government reports on the situation of the Roma community.

The Office for National Minorities also implements measures to reduce the vulnerability of individuals from marginalised groups within the framework of the National Roma Platform project – SIFOROMA6 (2023 to 2025).

Slovenia guarantees all children, regardless of the insurance status of their parents or guardians, equal access to healthcare services as those provided to children with health insurance coverage. This right applies until the child reaches the age of majority or completes formal education.

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

The registration of births is regulated by the Register of Deaths, Births and Marriages Act (Official Gazette of the Republic of Slovenia, No. 11711 – official consolidated text, and 67/19), which stipulates that the following data on births must be entered into the Register of Deaths, Births and Marriages: surname and given name, sex, day, month, year, time, and place of birth (for births abroad, also the country), citizenship, and the personal identification number (EMŠO). In addition, the following information about the parents is recorded: surname and given name, personal identification number (EMŠO), citizenship, and residence.

The birth of a child is registered by the registrar of the administrative unit in whose area the child was born. If a child is born while traveling in a means of transport, the birth is registered by the registrar of the competent authority in the area where the mother's journey ended. The law also regulates cases that do not occur in practice, such as the birth of a child to unknown parents. Such a birth would be entered by the registrar of the competent authority in the area where the child was found. Such an entry into the register would be made on the basis of a decision by the competent social work centre. The decision would include the child's surname and first name, sex and the date, month, year, hour and place of birth. The place of birth would be the place where the child was found.

In Slovenia, most children are born in one of 14 maternity hospitals, which report the birth to the relevant administrative unit. Maternity hospitals use the e-birth system, which means that data on the birth and parents are immediately transferred from the maternity hospital's information system to the civil register. Each newborn is immediately assigned a personal identification number (EMŠO), serving as a unique identifier, which also enables immediate health insurance coverage for the child. Once the birth has been registered at the administrative unit, a birth certificate can be issued immediately.

The birth of a child outside a healthcare institution must be reported to the administrative unit by the doctor, registered nurse or registered healthcare professional or certified midwife present at the birth, who is registered in the register of private healthcare professionals or has obtained a licence to perform healthcare activities from the ministry responsible for health; alternatively, the child's father, the person with whom the mother lives, or the mother herself (once she is able to do so) may report the birth. If none of the aforementioned persons are able to report the birth, it may also be reported by another person who was present at the birth or who became aware of the birth. The birth report must be accompanied by a birth certificate issued by the attending doctor, a certified healthcare professional or a certified midwife who is listed in the register of private healthcare professionals or has obtained a licence to practise healthcare from the ministry responsible for health. A birth certificate may also be issued by a doctor who was not present at the birth if he or she can confirm that the mother has given birth. Where such a certificate cannot be obtained, the birth may be entered in the register on the basis of a decision issued by the competent authority, provided that there is evidence of the fact of birth.

The birth of a child must be reported within fifteen days of the date of birth. The birth of a stillborn child must be reported within 24 hours. If the birth of a stillborn child cannot be reported within the specified period because the competent authority does not have office hours, the birth must be reported on the first working day after the expiry of the deadline. Persons who are required by the Personal Name Act to give a child a personal name must report the chosen name to the competent authority no later than thirty days after the child's birth.

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

The gender dimension is crucial to understanding human trafficking, the vulnerability of victims and the development of effective strategies to prevent and prosecute human trafficking. Sexual exploitation of victims, especially women, is the most widespread form of exploitation in Slovenia, which is why Slovenia focuses on preventing human trafficking and protecting victims through a gender-sensitive approach and through inter-institutional cooperation.

On 22 September 2023, the National Assembly of the Republic of Slovenia adopted the Resolution on the 2023-30 National Programme for Equal Opportunities for Women and Men (Official Gazette of the Republic of Slovenia, No. 105/23; hereinafter: the Resolution). It contains measures primarily aimed at:

- the implementation of assistance programmes for various vulnerable groups of women, including victims of human trafficking (victims of violence, female detainees and prisoners, women in prostitution, women addicted to illegal drugs),
- providing comprehensive support to victims of human trafficking,
- strengthening a multidisciplinary approach to eliminating harmful practices in the Roma community, such as minors running away to harmful environments, and early and forced marriages,
- protection and support for victims of sexual violence and gender-based violence in international protection procedures, with particular attention to vulnerable groups of women (minor girls, single mothers, pregnant women, women victims of human trafficking, unaccompanied minor girls, etc.).

Specific activities are defined in two-year implementation plans. The first implementation plan, adopted by the Government of the Republic of Slovenia on 3 October 2024, contains activities to be implemented in 2024 and 2025. These activities mainly relate to further education and training for professionals who encounter issues related to human trafficking in their work, strengthened inter-ministerial cooperation and collaboration with civil society, continued comprehensive support for victims of human trafficking, and raising awareness among young people about the dangers and traps of human trafficking.

In addition, in the period 2022-2025, the Ministry of Labour, Family, Social Affairs and Equal Opportunities co-financed various projects by non-governmental organisations that promote equal opportunities for women and men. In 2022, the Ključ Association – Centre for Combating Trafficking in Human Beings implemented the project Courage, aimed at alleviating the distress and creating equal opportunities for women who were displaced by the war in Ukraine and sought refuge in Slovenia. Through the project's activities, the organisation focused on empowering refugee women as a particularly vulnerable, conducting therapeutic workshops and integration activities aimed to provide relief, promote positive thinking and self-confidence, foster connections, expand social networks and promote cultural engagement.

In 2025, the Ključ Association – Centre for Combating Trafficking in Human Beings is implementing the project The Power of Support, which addresses the issue of the exploitation of particularly vulnerable persons for prostitution in Slovenia. The project involves working directly with women who have experienced prostitution, providing them with non-stigmatising support and assistance aimed, on one hand, at achieving stabilisation and, on the other, at encouraging their exit from traumatising circumstances. In addition, the project implementer will conduct discussions with young people on topics such as consent, relationships, violence, with an emphasis on sexual violence, and the harmful effects of pornography and prostitution. These discussions will involve both students in the regular education system and young people who, for various reasons, cannot live at home and are placed in institutional care. The project will also include a campaign to raise public awareness about the issue of child abuse for prostitution in Slovenia.

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

The 2021–2030 National Programme of Measures of the Government of the Republic of Slovenia for Roma (NPUR) is a strategic document with specific objectives and measures to improve the socio-economic situation of the Roma community, strengthen its social inclusion and empowerment, and increase its participation in decision-making processes, with the ultimate goal of achieving equality and full integration into society. It represents an important strategic framework addressing the multidimensional challenges of the Roma community in Slovenia. Its objectives include measures to reduce the vulnerability of individuals from marginalised groups, such as improving the socio-economic situation of Roma, increasing their social inclusion and empowerment, strengthening their participation in decision-making and policy-making processes, and achieving equality and full inclusion in society. The measures are implemented by the relevant ministries. The implementation of the programme is monitored through annual Government's reports on the situation of the Roma community.

The Office for National Minorities is also implementing measures to reduce the vulnerability of individuals from marginalised groups within the framework of project National Platform for Roma – SIFOROMA6 (2023 to 2025). The SIFOROMA6 project continues the work of previous projects (in particular SIFOROMA5) and focuses on strengthening the national Roma platform and raising awareness of early and forced marriages. As part of the project, professional lectures and training sessions have been organized addressing the identification of and response to cases of early and forced marriages. These sessions also included presentations of good practices and opportunities for the exchange of experiences.

The kick-off event was organised in October 2023 in Ljubljana as an initial meeting of a broader ad hoc working group established to address cases of early and forced marriages in the Roma community. The aim was to identify key needs for improving professional training and awareness-raising in environments where the occurrence of early marriages has been observed. Particular emphasis was placed on raising awareness among young people and the Roma community about the harmful consequences of such practices. Participants were shown award-winning films from the video competition "SIFOROMA: A Child Should Be a Child", produced as part of the previous SIFOROMA5 project. After the event, the video materials were published on the Office for National Minorities' YouTube channel. The activities and planned content of future lectures were presented, and participants exchanged experiences and suggestions for further work. As part of SIFOROMA6, six training sessions were held for field workers in regions where early marriages have been identified as an issue.

Professional training on identifying and responding to cases of early and forced marriages in the Roma community was carried out in November 2023 in Dolenjske Toplice and in December 2023 in Panonska vas near Moravske Toplice, as part of the SIFOROMA6 project. It was intended for Roma assistants, counsellors and professionals working in schools in south-eastern Slovenia and the Pomurje region. The training covered the prevention of violence against children and human trafficking in connection with the Roma community, with an emphasis on early and forced marriages. Roma assistants were recognised as a key link between children, parents and schools.

The aim of the training was to deepen participants' understanding of the manifestations of early and forced marriages, strengthen their ability to identify and respond to such cases, familiarise them with the procedures of the competent institutions, and encourage coordinated inter-agency cooperation. Particular emphasis was placed on the exchange of good practices among participants.

The professional lectures were also based on the Handbook on Identifying and Responding to Cases of Early and Forced Marriages, published in 2021 by the Office for National Minorities as part of the *National Platform for Roma* project. The handbook was developed in cooperation with representatives of ministries, the Supreme State Prosecutor's Office, the Police, the Association of Social Work Centres, non-governmental organisations and the Council of the Roma Community of the Republic of Slovenia. As part of the *SIFOROMA6* project, the handbook was reprinted as promotional material (January-July 2024).

In April 2024, the Office for National Minorities organized a professional training course in Ljubljana as part of the SIFOROMA6 project, titled "Identifying and responding to cases of early and forced marriage in the Roma community". The training was intended for court expert witnesses in the fields of clinical psychology, family medicine, psychiatry and social work. The aim of the event was to provide an in-depth understanding of Roma culture, the negative consequences of early and forced marriages, and the role of individual institutions in dealing with these cases. The training also included screenings of films from the SIFOROMA5 project, which served as a starting point for discussion. The discussion enabled the exchange of professional perspectives and proposals on how to better involve experts in dealing with cases of early and forced marriages in the Roma community.

In July 2024, the Office for National Minorities held an event dedicated to the interim evaluation of the implementation of the SIFOROMA6 project and the activities carried out in its first year of its duration. The main purpose of the event was to review and analyse the progress achieved through the implemented activities and to assess their impact. The event also presented the results of an online survey, which evaluated the quality of expert lectures on early and forced marriages in the Roma community and related events connected to the implementation of the 2021–2030 National Programme of Measures for the Roma (NPUR). The questionnaire had been distributed to all participants following each event and served as an important tool for obtaining feedback and guiding the project's future activities.

The closing event entitled "Identifying early signs of human trafficking – challenges in the educational environment" was organised by the Office for National Minorities in February 2025 at the Škocjan Cultural Centre. The purpose of the event was to strengthen the capacities of professionals and raise awareness about early and forced marriages, violence against Roma women and youth, and the role of local authorities in the integration of Roma. The event was divided into three sections: challenges of including Roma children in primary education, identification and intervention within the educational environment, and an interactive presentation of case studies and good practices. The event was attended by professionals from educational, social and security institutions. During the discussions, representatives of various institutions emphasised the importance of regular operation of multidisciplinary teams and the urgent need to eliminate the ghettoisation of Roma settlements as one of the key steps towards more effective inclusion of the Roma community into broader society.

Activities to reduce the vulnerability of individuals in various areas are also being carried out within the framework of multigenerational centres (VCG+), namely:

- social competences – content aimed at promoting integration into the social environment, building and maintaining relationships, strengthening empathy, learning conflict management skills; activities promoting responsible citizenship and democratic values; content aimed at strengthening communication skills and increasing motivation and empowerment for entering the labour market;
- health competences – content aimed at improving individuals' understanding of basic health information and their ability to make informed decisions about their health; promoting health awareness and a healthy lifestyle, and ensuring good physical, emotional and mental well-being;
- cultural competences - content supporting the development of language literacy in the mother tongue and foreign languages; promoting cultural awareness and expression, intercultural understanding and connection, and strengthening respect for cultural diversity;
- financial competences – content focused on managing personal finances to achieve financial independence and make informed financial decisions; activities for developing entrepreneurial competences;
- content aimed at preventing domestic violence, violence against women and children and other vulnerable target groups;<sup>2</sup>
- content supporting the integration of migrants and refugees and their families, especially women, children and young people;
- content promoting the social inclusion of Roma families, especially Roma women, children and young people.

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<sup>2</sup> Within the framework of this public call, various topics are defined in the field of identifying and responding to violence, understanding the difference between conflict and violence, presenting available forms of assistance, fostering healthy interpersonal relationships and positive family environments, promoting emotional literacy and non-violent communication, addressing peer violence, online violence, violence against the elderly, etc.

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

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

In March 2024, the Strategy of the Republic of Slovenia for Deinstitutionalisation of Social Care for the Period 2024–2034 was adopted. The document serves as the foundation for implementing the deinstitutionalisation reform in Slovenia, which includes the relocation of children from institution to the community, the development of community-based services for children with disabilities and their families, and the amendment of relevant legislation to support these measures.

Since autumn 2024, as part of the existing services and the network of institutions for children with intellectual disabilities, home help has been provided to families of children with mental and physical disabilities or other developmental disorders (up to the age of 26, enrolled in special education and training programmes). The rights and obligations of parents or guardians are taken into account in this process. This represents an upgrade of services aimed at strengthening family support while promoting inclusion and care within the home environment.

In 2019, the Personal Assistance Act (Official Gazette of the Republic of Slovenia, Nos. 10/17, 31/18 and 172/21) entered into force, establishing personal assistance as a legal right. Personal assistance is provided as a non-profit activity and is financed from the budget of the Republic of Slovenia. It provides users with support in performing tasks and activities that are unable to carry out independently but require on a daily basis, both at home and outside the home. This enables them to live independently, participate actively in the community and enjoy greater social inclusion.

Since 2022, persons with disabilities who hold the status of a person with disability under the Social Inclusion of Persons with Disabilities Act (Official Gazette of the Republic of Slovenia, No. 30/18, 196/21 – ZDOsk, 206/21 – ZDUPŠOP, 84/23 – ZDOsk-1 and 60/24 – Constitutional Court decision; hereinafter: ZSVI) have also been entitled to social inclusion services, including training for independent living, lifelong learning, supported living and maintaining the social inclusion of older persons with disabilities. These services are also financed from the budget of the Republic of Slovenia.

Personal assistance and social inclusion services for persons with disabilities contribute to greater social inclusion, expand social networks, strengthen independent living skills and enable full and effective participation in society. This indirectly reduces the risk of exploitation and prevents human trafficking.

Since 2019, the ZSVI has also defined the rights and procedure for obtaining the status of a person with disability for persons with permanent congenital or acquired impairments who, without appropriate services and support, are unable to socially integrate into the community, independently perform most or all essential life activities, or secure the means for their livelihood. The Act provides persons with disabilities with financial benefits, including disability allowances, which ensure basic social and economic security. This further reduces the vulnerability of persons with disabilities and the risk of human trafficking.

Various activities aimed at persons with disabilities are also carried out within the framework of multigenerational centres (VGC+), such as:

- a women's discussion group, a group for the empowerment of young people with physical disabilities (called "I Believe in Myself"),
- a group for persons with autism (called "My World"),

- an inclusive volunteering programme, which also includes persons with disability status as volunteers;
- a weekly workshop titled "Social Afternoon", functioning as a discussion and creative workshop,
- self-help groups for persons with disabilities and their family members or caregivers;
- an information service for persons with disability status and adolescents,
- events to raise public awareness and promote the acceptance and inclusion of persons with disabilities in society, and workshops to prevent prejudice against persons with special needs,
- workshops on employment opportunities for persons with disabilities.

All centres are committed to respecting the principles of equality and non-discrimination and to promoting the social inclusion of all vulnerable groups, including persons with disabilities, by ensuring the accessibility and adaptability of their programmes. The premises must be accessible to persons with mobility impairments, which is an important requirement for eligibility in the call for proposals.

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

Foster care, as a form of substitute care for children implemented as family-based child protection, is defined as a key priority area in the Resolution on Family Policy 2018–2028 – "A Society Friendly to All Families". Among its objectives in the field of foster care, the Resolution highlights the need to ensure a sufficient number of qualified foster families and to provide adequate support to foster parents.

The purpose of foster care is to enable children placed with persons who are not their parents to experience health growth, upbringing, education, balanced personal development, and preparation for independent life and work.

The decision to place a child in foster care and to appoint a foster parent is made by the court. The relevant social work centre then concludes a foster care agreement with the foster parent, which defines in detail the foster care relationship, including the rights and obligations of the contracting parties. The role of the social work centre is to monitor the implementation of foster care, maintain ongoing cooperation with the foster family, the child, and the child's biological family. An important part of this process also involves planning for the termination of the foster care arrangement.

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

The Family Code (Official Gazette of the Republic of Slovenia, Nos. 15/17, 21/18 – ZNOrg, 22/19, 67/19 – ZMatR-C, 200/20 – ZOOMTVI, 94/22 – decision of the Constitutional Court, 94/22 – decision of the Constitutional Court, 5/23 and 34/24 – decision of the Constitutional Court), which regulates guardianship, stipulates that a guardian must be a person possessing the personal qualities and abilities necessary to fulfil the duties of a guardian and who agrees to act as a guardian. A guardian cannot be a person: from whom parental authority has been withdrawn; who is legally incapacitated; whose interests conflict with those of the ward; who has entered into a lifelong care contract with the ward; whose spouse or common-law partner has entered into a lifelong contract with the ward; or whose personal characteristics or relationship with the ward or the ward's parents make it unlikely that they will properly perform the guardian's duties.

The guardian exercises independence in carrying out guardianship duties, although certain legal acts require the consent of the social work centre. The guardian is supervised by the social work centre, which requires the guardian to report on their activities at least once a year. If the social work centre

determines that the guardian is not acting in the best interest of the ward, it may propose the replacement of the guardian to the court.

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

In the child protection system, the Family Code provides for several possible forms of child placement when a child's healthy development is at risk or when other benefits to the child require it. The Family Code specifies the following placement options: a crisis centre, foster care, an institution, or placement with another person.

The Employment Rehabilitation and Employment of Persons with Disabilities Act (Official Gazette of the Republic of Slovenia, Nos. 16/07 – consolidated text, 87/11, 96/12 – ZPIZ-2, 98/14, and 18/21) provides a comprehensive legal framework for promoting the employment of persons with disabilities. The Act regulates the right to employment rehabilitation, defines measures to enhance the employability of persons with disabilities, and establishes supportive mechanisms for employers. The Act has made a significant contribution to increasing both the employment and employability of persons with disabilities, as well as improving their position in the labour market. Access to employment and opportunities to maintain employment contribute to greater social and economic security for persons with disabilities, thereby indirectly reducing their vulnerability and the risk of exploitation, including human trafficking.

Compared to other countries, Slovenia has a relatively low unemployment rate among persons with disabilities, which is the result of comprehensive support in accessing work and integrating into the labour market.

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

The website of the Government of the Republic of Slovenia provides the general public with comprehensive information on human trafficking, including relevant contacts and documents. In accordance with the Act on the Accessibility of Websites and Mobile Applications, all content is fully accessible and adapted to meet the needs of vulnerable groups.

In addition, the 2025-2026 Action Plan for Combating Trafficking in Human Beings provides for the preparation of information materials in an easy-to-read format, designed to raise awareness and inform the public about the dangers and pitfalls of human trafficking. The focus will be on recruitment methods, risk identification, appropriate action and self-protective behaviour.

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;

In order to identify potential victims of human trafficking among applicants for international protection, the Asylum Centre has been implementing the PATS project for several years. Within this framework, applicants are informed about human trafficking and preventive measures. Interviews are conducted in the presence of an interpreter. Each applicant for international protection receives a brochure in a language they understand, basic information on human trafficking and contact numbers where they can seek help and advice. In addition to providing information in various formats,

the implementing body also organizes additional activities, such as interactive workshops, group lectures, and similar initiatives.

In 2022, social workers trained by the **Ključ** Association conducted the interviews, carrying out 39 in-depth individual sessions aimed at raising awareness of human trafficking. The **Ključ** Association also conducted activities to inform individuals accommodated in facilities housing people from Ukraine.

On the basis of the contract concluded with the Office for the Support and Integration of Migrants (UOIM) for the implementation of the PATS project, the **Ključ** Association:

- carried out 457 individual information sessions in 2023, with 2,534 individuals participating in group information sessions;

- carried out 741 individual information sessions in 2024, 10 women's group sessions and 345 group information sessions.

These activities took place at the Asylum Centre branches in **Vič** and **Logatec**, at the student dormitory in **Postojna**, and also included persons from Ukraine at various other locations.

In cases where potential victims of trafficking are identified, the Police contact point is immediately notified. The police then conduct interviews with the potential victims and take all necessary measures to ensure their protection.

b. access to legal assistance and representation;

Persons identified by the police as victims of human trafficking or reasonably suspected of being victims of human trafficking are eligible for assistance under the projects "Assistance to victims of human trafficking – crisis accommodation", funded by the Ministry of Labour, Family, Social Affairs and Equal Opportunities, and "Assistance to victims of human trafficking – safe accommodation", funded by the Ministry of the Interior. Victims are also entitled to legal assistance, including both paid legal counseling and *pro bono* legal services. Volunteers with relevant professional knowledge may also participate in providing support. The implementing organization may also seek assistance from the Legal Information Centre for Non-Governmental Organisations, the Legal Centre for Human Rights Protection and the Victim Support Service operating at the District Court in **Ljubljana**. Legal counseling for victims of trafficking is also available as part of legal aid co-financed by local communities. In certain cases, applications for free legal aid have also been submitted, in accordance with the Free Legal Aid Act.

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

The rights of applicants for international protection include the right to reside in the Republic of Slovenia, access to material support when accommodated in the Asylum Centre or its branch, financial assistance if residing at a private address, urgent medical treatment, education, access to the labour market, humanitarian aid, and pocket money.

Applicants for international protection are accommodated in the Asylum Centre or its branches. In cases of exceptional personal circumstances, and when suitable accommodation in the Asylum Centre cannot be provided, they may be accommodated in other institutions based on their application. On the basis of their application and if they meet the conditions laid down by law, applicants may also be accommodated at private addresses. If eligible and meeting the required conditions, they receive financial assistance when accommodated outside the Asylum Centre.

Improvements have been made at the Asylum Centre in **Ljubljana** to improve living conditions. The number of staff has also been increased, with ongoing training aimed at improving the psychosocial support provided to the applicants accommodated there.

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;

In early 2025, the Employment Service of Slovenia (hereinafter: ESS), in cooperation with the Ministry of Labour, Family, Social Affairs and Equal Opportunities, established an Info Point for Foreigners with the aim of providing comprehensive support to migrant workers and their employers. The ESS recognises that foreigners are often subject to violations of their rights and unequal treatment due to a lack of clear and accurate information. Foreigners coming to work in the Republic of Slovenia frequently rely on information provided by various intermediaries or agents, which is often unreliable or unverified. The procedures for employing foreigners are lengthy and complex, further contributing to a lack of awareness of their rights. The Info Point is therefore intended for foreign workers who are or will be employed in Slovenia, employers who hire foreigners, and others who require advice or administrative assistance related to the employment of foreigners.

The main objective of the Info Point is to create a communication channel and a supportive environment accessible to migrant workers, employers, and the wider public, offering information, counselling, and administrative assistance regarding employment and labour procedures, legislative developments in the employment of foreigners, and rights in the areas of work, social protection, and health care in Slovenia.

The Info Point provides migrant workers with information on employment opportunities and working conditions, support for their integration into the Slovenian labour market, and guidance on procedures and documentation required to obtain a single permit, a residence permit, and the appropriate work permits in line with the purpose of their entry and stay. It also provides information on rights and obligations under labour law, on procedures for the protection of rights in the event of violations, and on the exercise of rights upon termination or expiry of employment. In addition, the Info Point offers assistance with administrative procedures, support in overcoming practical obstacles, and guidance on the use of modern online services.

For foreigners and for persons granted international protection, the ESS provides a specially adapted counselling process tailored to their specific needs and aimed at facilitating their entry into the labour market. This process emphasises intercultural competences and the role of social mediators in supporting labour market integration, while continuously promoting the importance of learning the Slovenian language and familiarisation with the institutional system.

At the Info Point, individuals receive information on employment opportunities and working conditions, administrative procedures and documentation required to obtain work and residence permits, rights and obligations under labour law, on procedures for the protection of rights in the event of violations, and on the exercise of rights upon termination or expiry of employment. They also receive assistance with administrative procedures and support in overcoming other practical obstacles.

The Info Point is accessible by telephone and e-mail, and also offers in-person consultations. In cases where violations are identified, the Info Point refers foreigners to the competent supervisory authorities. Where violations are detected during consultations, the ESS also submits reports directly to the competent law enforcement authorities.

The ESS also organises employment events in countries of origin, inviting verified employers, trade unions, and workers' rights advocates to provide foreign workers with reliable information on living

and working conditions in Slovenia, with the aim of ensuring the highest possible level of protection for migrant workers. Such events have already been held in Bosnia and Herzegovina, Serbia, Montenegro, North Macedonia, Uzbekistan, and the Philippines.

During the reporting period, the ESS organised several conferences, round tables, and other events focusing on labour migration and the protection of workers' rights. These events brought together representatives of public employment services from abroad, Slovenian and European institutions active in the labour market, as well as representatives of trade unions, employers, professional associations, and non-governmental organisations working in the field of labour migration and the protection of workers' rights. These activities have further contributed to raising awareness and informing the general public about the protection of migrant workers' rights.

As part of the implementation of its annual plan of employment fairs, ESS also organises special fairs dedicated to persons with a migrant background who require additional support in accessing employment. In addition, such persons are invited to participate in other employment fairs, enabling them to obtain first-hand information on employment opportunities with pre-verified employers. The ESS has also appointed specially trained counsellors at local employment offices to provide targeted employment and integration support for persons with a migrant background.

The Labour Inspectorate of the Republic of Slovenia (hereinafter: IRSD) participated in the 18-month EURODETACHEMENT (ED6) project, entitled "Posting of Workers: Strengthening and Deepening Transnational Cooperation". The related information campaign included the preparation of a leaflet, aimed at raising awareness among workers, particularly third-country nationals posted from Slovenia to Germany. The IRSD implemented the project in cooperation with its German partner, the non-governmental organisation BEMA (Arbeit und Leben). The outcome of the campaign was a leaflet on the rights of posted workers in Germany, translated into six languages (Slovenian, English, German, Croatian, Serbian, and Albanian). The leaflets are available in places frequented by posted workers, particularly third-country nationals (e.g. cultural centres, the Info Point for Foreigners, and IRSD offices).

In cooperation with the ESS, IRSD representatives also actively participate in workshops entitled "Integration of Migrants into the Labour Market," providing general information to workers on their labour rights and advising participants on appropriate steps to take and competent institutions to contact in the event of violations.

The IRSD also provides professional support to workers regarding their labour rights as part of its general prevention activities.

b. provision of clear employment contracts;

When issuing work permits and consents for single residence and work permits, the ESS also verifies that an employment contract signed by the employer has been submitted, in accordance with the provisions of the Employment, Self-Employment and Work of Foreigners Act (Official Gazette of the Republic of Slovenia, Nos. 91/21 – official consolidated text, 42/23 and 32/25; hereinafter: ZZSDT). Article 7(1) of the ZZSDT stipulates that the employment contract must comply with the legislation governing employment relationships and with collective agreements binding on the employer. Accordingly, before issuing consent or a work permit, the ESS verifies whether the employment contract complies with the provisions of labour legislation and ensures that the foreign worker is granted all rights arising from the employment relationship. The ESS also checks that the contract does not contain provisions that could infringe the worker's rights, such as the imposition of costs on the worker, excessive contractual penalties, unlawful deductions, or restrictions on employment with another employer.

In the procedures for issuing work permits under the Bilateral Employment Agreements with Bosnia and Herzegovina and with Serbia, bilingual contracts are concluded. A proposal has also been submitted to amend the ZZSDT to make bilingual contracts mandatory in procedures for issuing consents for single residence and work permits.

The Ministry of Foreign and European Affairs also reviews all draft contracts concluded by the heads of Slovenian diplomatic and consular missions abroad for so-called service staff positions, ensuring that such contracts comply with the regulations of the host country and guarantee at least the minimum labour standards.

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

Foreign workers have the same rights and obligations arising from the employment relationship as domestic workers. They have access to a Slovenian language programme at survival level, orientation courses on Slovenian society, and the opportunity to take the initial language proficiency test. With the aim of enhancing the protection of migrant workers, the State is adopting significant legislative amendments, introducing new measures, and closely monitoring all violations of labour and migration legislation.

Third-country nationals must obtain a single residence and work permit in order to take up employment or participate in training. Foreign nationals who are not citizens of an EU Member State may perform seasonal work of up to 90 days within a calendar year on the basis of a seasonal work permit. For seasonal work exceeding 90 days per year, foreign nationals must obtain a single permit issued on the basis of consent for seasonal work.

Nationals of Bosnia and Herzegovina and Serbia are also required to obtain work permits in order to be employed in Slovenia.

Each application for a single residence and work permit must be accompanied by an employer's declaration on the accommodation of the migrant worker, stating whether the employer provides accommodation. If accommodation is provided, the employer must specify the exact address of the accommodation and who covers the costs. The ESS verifies these declarations and, during interviews with foreign applicants conducted through Slovenian diplomatic and consular missions abroad, also checks whether the workers are informed about their accommodation arrangements in the Republic of Slovenia and whether their information corresponds to that provided by the employer. In accordance with Article 10(1) of the ZZSDT, employers and contractors providing accommodation to foreign workers in Slovenia are required to ensure minimum living and hygiene standards. Where the ESS has doubts that these standards are met, it submits a request for inspection to the IRSD. The IRSD may then verify on site whether the minimum living and hygiene standards are being met once the workers have already been accommodated.

During the procedure for issuing a single residence and work permit, the employer is subject to a comprehensive verification process, including checks on active business operations, settlement of tax obligations, and whether the employer is prohibited from employing foreigners due to prior violations. The ESS also reviews the employment contract conditions, which should, as a rule, provide for full-time employment, and ensures compliance with minimum wage provisions and other relevant labour standards. These measures are aimed at guaranteeing decent work for all foreign workers.

The Info Point for Foreigners also provides information and support regarding access to health care services, education, and other rights. A foreigner who has been permitted to stay in the Republic of Slovenia is, under the Foreigners Act (hereinafter: ZTuj-2), entitled to emergency health care in accordance with the Act governing health care and health insurance, as well as to basic care. School-age foreign minors are also entitled to basic education.

d. possibility to change employers;

Foreigners employed in the Republic of Slovenia on the basis of consent for employment linked to a specific employer may, during the validity of their single residence and work permit, change their employer on the basis of consent for a change of employment issued by the ESS, provided that the foreign worker holds a valid residence permit, a valid prior consent, and that all other conditions prescribed by law are met. The consent is also sent directly to the new employer, who may employ the foreign worker immediately upon receipt of the consent. On the basis of written approval, it is possible to change the work position with the same employer, change employers, or take up employment with two or more employers.

Certain categories of foreigners have free access to the labour market and may change employers freely. Among these are foreigners residing in the Republic of Slovenia on the basis of a temporary residence permit as victims of trafficking in human beings, and those residing on the basis of a temporary residence permit as victims of illegal employment.

e. access to confidential complaints mechanisms;

In all procedures, foreigners are treated in a manner that ensures the protection of their personal integrity and personal data, and anonymity is guaranteed if requested during the counselling process.

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

Foreign workers have the right to join trade unions and to enjoy all related rights.

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

In specific cases where the employment relationship of a foreign worker has been terminated due to violations on the part of the employer, the ESS conducts the procedure for issuing new consent or a work permit for employment with another employer as a matter of priority, in order to enable the worker to reintegrate into employment as quickly as possible. At the same time, the ESS provides information and assistance to the worker on the steps required to regularise their residence status and which authorities to contact.

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?

In accordance with Article 2 of the Labour Inspection Act (Official Gazette of the Republic of Slovenia, Nos. 19/14 and 55/17; hereinafter: ZID), the Labour Inspectorate of the Republic of Slovenia (hereinafter: IRSD) is responsible for performing inspection duties relating to the implementation of acts, other regulations, collective agreements and general acts in the fields of health and safety at work, employment relationships, minimum wage, labour market and employment, work and employment of foreigners, worker participation in management, and strikes. The IRSD also performs inspections relating to the implementation of other acts and regulations where so provided. Within the scope of its competences, the IRSD carries out inspections across all economic sectors, including the public sector, with particular attention to sectors presenting a heightened risk of labour exploitation. In the Republic of Slovenia, the competences of the IRSD are clearly separated from those of the immigration control authorities.

When carrying out inspection duties, labour inspectors pay particular attention to identifying indicators of trafficking in human beings. Whenever such irregularities are detected, inspectors act in accordance

with the Guidelines for Labour Inspectors, prepared jointly by the Ministry of the Interior and the IRSD in April 2022.

As of 31 December 2024, the IRSD employed 132 staff members, including the Chief Inspector and 100 inspectors – the highest number in the history of the institution. Of these, 62 inspectors worked in the field of employment relationships, 32 in health and safety at work, and 6 in social inspection. The IRSD continues to pursue efforts to strengthen its human resources through the recruitment of additional inspectors. As of 26 May 2025, a total of 108 inspectors were employed.

During the reporting period, inspection activities were, to a significant extent, conducted within targeted or intensified campaigns, and in some cases through coordinated actions in cooperation with other supervisory authorities. The IRSD maintains close cooperation with other supervisory authorities, both through systematic and case-specific data exchange and within the framework of regional coordination mechanisms. It also cooperates with the Employment Service of Slovenia and the Health Insurance Institute of Slovenia, primarily in the exchange of initiatives, findings, and proposals for the initiation of minor offence proceedings.

The IRSD also frequently collaborates with trade unions in exchanging information and, at their initiative, organises targeted inspection campaigns or addresses individual cases. The IRSD is represented in the Interdepartmental Working Group on Combating Trafficking in Human Beings, where it actively cooperates with other members and stakeholders.

At the international level, the IRSD participates in joint and coordinated inspections supported by the European Labour Authority (hereinafter: ELA), as well as in Joint Action Days organised within the European Union in cooperation with Europol, aimed at preventing the exploitation of workers and trafficking in human beings. Numerous other activities have also been carried out in cooperation with the ELA, including meetings, working groups, information exchange, the preparation and implementation of training programmes, and coordinated joint inspections. In March 2024, the IRSD hosted joint inspections involving the supervisory authorities of Slovenia and the Netherlands, followed by similar activities in April in cooperation with German supervisory authorities. In December 2024, the IRSD, in cooperation with the Embassy of India, organised an event focusing on the key rights of foreign workers in Slovenia. The presentation included an overview of Slovenian labour legislation, procedures for reporting violations, and the mechanisms available for protecting workers' rights

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 operation of employment agencies is governed by the Labour Market Regulation Act (Official Gazette of the Republic of Slovenia, Nos. 80/10, 40/12 – ZUJF, 21/13, 63/13, 100/13, 32/14 – ZPDZC-1, 47/15 – ZZSDT, 55/17, 75/19, 11/20 – decision of the Constitutional Court, 189/20 – ZFRO, 54/21, 172/21 – ZODPol-G, 54/22, 59/22 – decision of the Constitutional Court, 109/23, 62/24 – ZUOPUE, and 70/25; hereinafter: ZUTD) and the Rules on the Performance of the Activity of Providing Workers to a User Undertaking (Official Gazette of the Republic of Slovenia, Nos. 15/14, 38/15, and 90/15).

Supervision of the provisions of the ZUTD is carried out by Ministry of Labour, Family, Social Affairs and Equal Opportunities (hereinafter: MDDSZ) and the Employment Service of Slovenia (hereinafter: ESS), while the inspection supervision of the implementation of the Act is performed by the IRSD as the competent minor offence authority.

### Employment agencies (employers providing workers)

The ESS provides services to private employment agencies when they act as employers, i.e. as so-called employers providing workers to user undertakings. Such agencies conclude an employment contract with the selected candidate.

Agencies employing workers for the purpose of assigning them to user undertakings, where they temporarily perform work under the supervision and in accordance with the instructions of the user, may commence operations on the date of entry in the domestic register of Slovenian legal or natural persons authorised to perform the activity of providing workers to user undertakings, or in the corresponding register of foreign legal or natural persons authorised for the same activity. Entry in the register is made once the decision issued by the MDDSZ becomes final, provided that the employer meets the statutory requirements. Agencies must comply with the staffing, organisational, spatial, and other requirements prescribed in detail by the minister responsible for labour. The agency must also employ professional staff who have successfully passed the professional examination organised by the ESS.

The MDDSZ may revoke an agency's authorisation to perform this activity and remove it from the register in cases stipulated by the ZUTD.

The ESS and employers providing workers cooperate within the domestic labour market. Such employers have access to similar forms of support and services offered by the ESS as other employers in Slovenia. However, employers providing workers are not eligible for subsidies under active employment policy measures for employing workers who would subsequently be assigned to user undertakings, and certain restrictions also apply to the employment of third-country nationals. Temporary employment agencies may only employ third-country nationals who already have free access to the Slovenian labour market, a single residence and work permit, or an EU Blue Card. Consequently, employment agencies do not recruit third-country nationals directly from abroad.

### Private employment agencies and other providers of recruitment services

Some private employment agencies offer employers services related to the recruitment, search, and selection of candidates, as well as administrative support in the employment process (services paid for by the employer), whether for recruitment from the domestic labour market or from third countries. In such cases, when contacting the ESS, the agencies or other private providers act as the employer's authorised representatives on the basis of a written authorisation issued by the employer.

The ESS does not cooperate with private employment agencies or other providers when they do not act as employers, but only as service providers (e.g. candidate search or career counselling) whose services are paid for by their clients. Although the ZUTD includes a provision allowing for the granting of concessions for the performance of such labour market services, in recent years there have been no active concessions or public calls for the implementation of lifelong career counselling or job placement services. Vacancies may be published through the ESS only for the direct employer who will employ the selected candidates; therefore, the ESS does not publish vacancies submitted by intermediaries. The same rule applies to the implementation of labour market control procedures.

Based on the findings of previous inspections, analyses of its own data, and information obtained from other supervisory authorities and stakeholders in the field of labour, the central focus of the IRSD's Programme Guidelines for 2025 is the protection of labour rights of vulnerable groups, in particular migrant workers from third countries, supervision of cross-border service provision, and monitoring of the labour recruitment system, with the aim of preventing the illegal lending of workers.

In the course of inspections in the field of providing workers to user undertakings, IRSD inspectors have found that workers are often “assigned” to users by employers who do not hold the required authorisation or are not entered in the relevant register. These employers provide workers to user undertakings under the guise of business cooperation agreements, while the actual relationship displays all the characteristics of the activity of providing workers to a user undertaking. Handling such cases is demanding and highly complex, often involving cross-border elements and the employment of foreign workers. Numerous procedural steps must be taken, and extensive information must be obtained in advance. Demonstrating that the work process in practice constitutes the provision of workers to a user undertaking is only possible if the inspection is carried out at the location where the workers perform their tasks. This also means that a labour inspector cannot determine how the work process is organised (i.e. whether it involves the su) if the workers have been posted abroad.

In 2025, the IRSD is carrying out a targeted inspection campaign focusing on employers entered in the register of domestic legal and natural persons authorised to perform the activity of providing workers to user undertakings, with the aim of verifying compliance with the provisions governing this area. Particular attention is devoted to verifying whether the assigned workers enjoy the same rights as those employed directly by the user undertaking.

Each year, in accordance with Article 5 of the Inspection Service Act, the IRSD submits proposals for amendments and supplements to regulations aimed at improving supervision, addressing legal gaps, preventing abuses and violations of labour legislation, and ensuring faster and more effective implementation of inspection procedures and measures when irregularities are identified. A significant number of these proposed amendments concern the field of agency work, ranging from suggestions to revise the definition of the provision of workers to a user undertaking to proposals relating to penalty provisions. The MDDSZ followed the proposals of the IRSD. A considerably broader definition of the provision of workers to a user undertaking was adopted, aimed at preventing the misuse of the law in practice, along with several other changes in this area.

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?

In recent years, it has become apparent in Slovenia that certain legal arrangements in labour law and economic activities – such as self-employment, fictitious branch offices, chains of subcontractors, and the use of posted workers – are often misused. Such abuses pose a serious risk for the commission of other criminal offences, including trafficking in human beings. These abuses are sanctioned in accordance with the applicable legislation, and the State has also adopted a number of measures to prevent them.

When issuing consents for single residence and work permits, the ESS verifies, among other things, whether the employer seeking to employ a foreign worker has a genuine employment need or whether the worker will merely be assigned to another employer. A single permit issued or extended on the basis of consent for employment, as well as consent for a replacement, is, in accordance with Article 16 of the Employment, Self-employment and Work of Foreigners Act (hereinafter: ZZSDT), linked to the employer’s actual employment needs. For this purpose, the ESS requires the submission of additional supporting documentation, such as service provision contracts with clients in the Republic of Slovenia in the Republic of Slovenia, accounting statements of the company’s fixed assets, and the act on the systematisation of positions with the company’s job catalogue.

Employers are also requested to clarify whether the foreign worker obtained the employer’s contact information (or vice versa); whether the worker knows the employer with whom they will be

employed; whether the worker is familiar with the work to be performed in Slovenia; in which language the employment contract was provided and explained to the worker, including information on working conditions; whether the worker knows where they will be accommodated in Slovenia; and their knowledge of the language. Similar questions are posed to the foreign worker during the interview conducted through the diplomatic or consular mission of the Republic of Slovenia. In this way, the ESS verifies the consistency of the information provided by the employer and the foreign worker.

The ESS pays particular attention to employers who have not yet employed any workers, have only recently been registered, and seek to employ a large number of third-country nationals immediately after registration, particularly from Asian countries.

The IRSD has observed that, in general, most employers subject to inspection intend to operate in compliance with the regulations. However, there are also employers or individuals who have been subject to proceedings for many years and against whom measures have not achieved the intended effect. These employers often establish new legal entities and reappear as its responsible persons, or they operate behind a business entity with which they are not formally associated.

In view of the above, the IRSD has submitted a proposal to amend the Companies Act (Official Gazette of the Republic of Slovenia, Nos. 65/09 – official consolidated text, 33/11, 91/11, 32/12, 57/12, 44/13 – decision of the Constitutional Court, 82/13, 55/15, 15/17, 22/19 – ZPosS, 158/20 – ZIntPK-C, 18/21, 18/23 – ZDU-10, 75/23, and 102/24). The proposal aims to require that all legal entities registered in Slovenia (including branch offices) have, entered in the business register, an authorised person for the service of documents and communication with official authorities. Such a person would be required to reside in Slovenia, have a good command of the official language, be authorised to receive official correspondence, and maintain a mandatory electronic mailbox for the service of documents addressed to the legal and responsible person. These amendments would contribute to a more orderly business environment, facilitate communication, and prevent the evasion of service of official documents. It was further proposed that, when registering a company or sole trader with the Agency of the Republic of Slovenia for Public Legal Records and Related Services (AJPES), it should be mandatory to indicate where company documents are kept (at the company's registered office, at an accounting service, etc.), as some employers do not have business premises at the company's registered address, a mailbox, or a legal representative with a registered residence in Slovenia. This situation often results in longer inspection procedures.

In the area of precarious work, inspectors have found that most civil-law contracts containing elements of an employment relationship are concluded in the construction, hospitality, and tourism sectors. There has also been a growing trend in the conclusion of business cooperation contracts, particularly in the construction sector, where contracts are concluded between main contractors and subcontractors, thereby creating a chain of contractors. In such business models, it is then necessary to determine whether the relationship contains elements of an employment relationship or whether it in fact constitutes the provision of workers to a user undertaking. Inspectors report that such violations are difficult to establish in practice, as they require a high standard of proof.

The IRSD also monitors compliance with provisions governing cross-border service provision and the posting of workers, where most violations occur because foreign employers either fail to register the service before commencing work, submit an incomplete declaration, fail to perform the service in accordance with the submitted declaration, do not keep or submit the required documentation, or fail to provide a translation when requested by the competent supervisory authority.

When supervising the implementation of the Employment, Self-employment and Work of Foreigners Act, the most frequent violations are found where employers allow foreign workers to perform tasks

other than those for which consent was granted during the procedure for issuing or extending a single residence and work permit, an EU Blue Card, or a written authorisation, or for which a seasonal work permit was issued. In the field of employment, self-employment, and work of foreigners, irregularities are mainly related to issued single residence and work permits and official information documents, where employers have allowed foreign workers to perform work contrary to the conditions laid down in their permits.

In cases where violations are detected, the IRSD acts within its powers and cooperates with other supervisory and state authorities at both the systemic and operational levels. In cases of suspected criminal offences, the IRSD cooperates with and informs the competent law enforcement authorities.

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?

Slovenian legislation prevents trafficking in human beings in various ways by ensuring lawful migration pathways and decent working conditions. Legislation governing the posting of workers abroad, the employment of foreign workers, and the recognition of professional qualifications together provide transparent employment procedures, protection of workers, and recognition of their professional competences. These measures help reduce the risk of migrant exploitation and promote their safe integration into the labour market.

In addition, on 28 March 2024, the Government of the Republic of Slovenia adopted the Strategy of the Government of the Republic of Slovenia in the Field of Immigration.<sup>5</sup>

The strategy treats immigration as a general and ongoing social phenomenon and seeks to ensure safer migration routes and effective asylum procedures, while respecting fundamental human rights and freedoms, protecting vulnerable groups, and preventing irregular migration associated with organised crime. At the same time, it addresses the needs of the economy in employing foreign workers and provides for more effective supervision of their employment, where the highest risk of abuse of workers' rights has been identified. The latter is particularly important in preventing trafficking in human beings for the purposes of forced labour and labour exploitation.

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?

Since 2015, Slovenian legislation (Article 113 of the Criminal Code) has enabled the prosecution of individuals who knowingly use the services provided by victims of trafficking in human beings. Such offences are punishable by imprisonment of up to three years and a fine.

Comprehensive information on the criminal offence of trafficking in human beings is available on the website of the Government of the Republic of Slovenia, in both Slovenian and English. The website also contains various materials and publications intended for professionals as well as for the general public.

Measures aimed at reducing the demand for trafficking in human beings include a range of preventive activities designed to raise awareness of the responsibility of users of goods and services that may be linked to exploitation. To this end, the Government of the Republic of Slovenia finances a number of projects implemented by non-governmental and humanitarian organisations.

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<sup>5</sup> Available at: <https://www.gov.si/assets/ministrstva/MNZ/SOJ/Novice/Strategija-vlade-RS-na-podrocju-priseljevanja.pdf>

In 2022, the Ministry of the Interior of the Republic of Slovenia (hereinafter: MNZ) funded an awareness-raising project on the risks of trafficking in human beings faced by persons fleeing the war in Ukraine. To mark the EU Anti-Trafficking Day, an online campaign was carried out from 18 to 21 October in cooperation with the International Centre for Migration Policy Development (ICMPD) and the Network of Anti-Trafficking Coordinators of South-East Europe (NATC SEE). The campaign targeted vulnerable groups as well as the general and professional public. On this occasion, representatives of the NATC SEE network also adopted a joint statement outlining key recommendations for preventing trafficking in human beings among persons displaced by the war in Ukraine.

In 2023, to mark the EU Anti-Trafficking Day, the MNZ and the Government Communication Office of the Republic of Slovenia co-financed a project aimed at raising awareness of trafficking in human beings for the purpose of forced labour and labour exploitation. The project was implemented by the DrogArt Association through its social enterprise Iz principa. Between 18 and 20 October, awareness-raising activities targeting the general public and vulnerable groups were carried out through an innovative street campaign featuring "live products" – workers portrayed as exploited labourers displayed in packaging on main pedestrian streets in Maribor and Ljubljana. To further raise employers' awareness of trafficking in human beings, an electronic catalogue was prepared, presenting profiles of workers most commonly subjected to exploitation. The e-catalogue, together with the Employer's Manual published by the MNZ in 2020, was distributed to more than 200 companies across Slovenia. To present the project and commemorate the EU Anti-Trafficking Day, a media event was held on 18 October.

In 2024, the MNZ funded a project implemented by the **Ključ** Society, focusing on trafficking in human beings for the purpose of sexual exploitation and on raising awareness among potential users of services provided by victims. Within the project framework, the implementing organisation carried out activities to raise awareness among both vulnerable groups and the general public.

For the awareness-raising component directed at vulnerable groups, workshops were organised for residents of several specialised youth care institutions, including the Višnja Gora Competence Centre, the Jarše Youth Home, and the Kranj Competence Centre. The discussions addressed the risks of sexual exploitation of minors, the methods used to recruit potential victims both in person and online, the interlinkages between prostitution and trafficking in human beings, and the types of support available to victims. The wider public was reached through a 30-second awareness-raising video spot and accompanying social media posts. In addition, a professional consultation was organised on 18 October 2024 at Ljubljana City Hall to mark the EU Anti-Trafficking Day, with the participation of, among others, the National Coordinator for Combating Trafficking in Human Beings.

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?

As part of border control procedures, Slovenian police officers carry out general profiling of passengers, paying particular attention to indicators that may suggest that a person could be a victim of trafficking in human beings. Where such indicators are identified, officers may conduct additional interviews based on the assessed risks. Each year, the Criminal Police Directorate organises specialised training on trafficking in human beings for border police officers, ensuring that all are adequately equipped to recognise the indicators of trafficking in human beings. These indicators form part of the national guidelines for identifying victims, which are regularly updated in line with EU and Frontex standards.

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

No specific measures have been adopted to prevent trafficking in human beings in the field of sport, as the competent authorities have not received any warnings, reports, or indications suggesting that trafficking in human beings occurs within Slovenian sports activities.

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?

The Slovenian police have for several years been systematically monitoring key online platforms used for advertising sexual services. On these platforms, indicators suggesting potential elements of trafficking in human beings are regularly identified. In several cases, advertisements confirming suspicions of such activities have been detected, often linked to individuals or members of organised criminal groups promoting their services through various Slovenian websites. In addition, cases of suspicious recruitment and employment practices have been identified, indicating possible links to trafficking in human beings.

To prevent the misuse of information and communication technologies for the commission of such offences, the Slovenian police cooperate closely with internet service providers (e.g. Facebook, Google, and TikTok) in identifying and removing content that promotes exploitation. Intensive cooperation is also maintained with the administrators of domestic online platforms, where information is exchanged and measures are taken to remove unlawful content and advertisers.

In Slovenia, several reporting channels and services are in place to enable anonymous reporting of such cases (e.g. Safe.si and Spletno oko). Furthermore, national legislation, in line with Directive 2011/36/EU of the European Parliament and of the Council, explicitly criminalises online recruitment of persons for the purpose of trafficking in human beings.

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?

Since 2021, the Ministry of the Interior of the Republic of Slovenia has been implementing systematic awareness-raising activities for children and young people on the dangers of trafficking in human beings, its various forms, and appropriate responses and protective behaviour. These workshops are organised in primary and secondary schools across Slovenia. As children and young people spend a significant amount of time online – an environment increasingly used by perpetrators for recruitment and exploitation – the workshops also address the risks associated with online activities and teach participants how to recognise and avoid potential dangers. Teaching staff and social workers from participating schools also take part in these workshops. In 2023, a total of 280 workshops were carried out, including 146 in primary schools and 134 in secondary schools, attended by 5,267 pupils and 304 members of teaching staff. In 2024, 155 workshops were held – 69 in primary schools and 86 in secondary schools – attended by 3,237 pupils and 181 members of teaching staff. At the request of individual schools, several workshops were also organised for parents.

To raise awareness among the general public and vulnerable groups, a wide range of information on the criminal offence of trafficking in human beings is available in both Slovenian and English on the website of the Government of the Republic of Slovenia.

See also responses under points 2(b) and 6(a).

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

The Slovenian Criminal Police cooperate with internet service providers in accordance with national legislation, which obliges all stakeholders to collaborate in preventing and combating trafficking in human beings. In the case of social networks and communication channels based abroad, cooperation is also conducted through international mechanisms, including Europol and Interpol channels. Such cooperation is crucial for removing advertisements, identifying users, and obtaining digital evidence.

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

Persons with lived experience of trafficking in human beings play an essential role in the development of effective prevention measures, the identification of victims, and the provision of support for their social and economic recovery. In Slovenia, the insights and experiences of victims are incorporated into anti-trafficking policies and prevention practices primarily through non-governmental and humanitarian organisations, which maintain direct contact with victims and thus have access to key information about their needs.

In line with the Action Plan for the Period 2025–2026, the Republic of Slovenia will aim to further strengthen the involvement of victims in evaluating the existing system and co-shaping policies in this area. To this end, a professional consultation on the participation of persons with lived experience of trafficking in human beings (victims) in the policy-making process will be organised in the second half of 2026, with the objective of adopting appropriate measures.

## 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 Slovenian police have dealt with several cases of victims subjected to exploitation on the basis of their sexual orientation or gender identity. The most recent case of a transgender victim that the Slovenian police dealt with took place last year. We would like to emphasise that the police are actively engaged in promoting gender equality and respecting the rights of all individuals. They are committed to upholding human rights and prohibiting discrimination on the basis of gender, sexual orientation, gender identity and other personal circumstances. Ongoing police training and nationwide awareness campaigns are being actively implemented.

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

In identifying victims of labour exploitation, the police and the IRSD regularly work with non-governmental organisations and the Association of Free Trade Unions of Slovenia in joint EMPACT

actions, which involve informing people working in high-risk economic sectors about human trafficking and the rights of THB victims.

In the victim identification process, the police also consistently cooperate with non-governmental and humanitarian organisations that deliver assistance programmes for THB victims. In accordance with the Manual on the Identification, Assistance and Protection of Victims of Human Trafficking (hereinafter: Manual)<sup>6</sup>, the police inform all confirmed or presumed victims of human trafficking of their rights, including their right to assistance and support, access to safe accommodation during recovery and reflection period, and their right to participate in criminal proceedings. Victims are also provided with information materials in a language they understand.

To support the identification of potential victims of human trafficking and guide further action in their work, IRSD inspectors use the Guidelines for Labour Inspectors – Identifying Trafficking Victims, adopted in 2022. In addition, a designated contact person is available for inspectors to consult when they identify indicators of human trafficking.

In 2024, the IRSD established a Priority Response Sector, which became operational on 1 October 2024. This sector brings together labour relations inspectors and occupational health and safety inspectors. In the field of labour law, the sector's primary responsibility is to conduct inspections in cases where rights violations affect a large number of workers or where the protection of the public interest is at stake. This applies particularly when the severity and scale of violations significantly impact protected values, when immediate intervention is required, when breaches involve the employment of foreign workers or the provision of workers to users in contravention of regulations—especially concerning vulnerable groups of workers—and when multiple or repeated violations provide reasonable grounds to suspect illegal operations by employers, etc. In the area of occupational health and safety, the sector focuses on preventing imminent danger to workers' lives, reducing the risk of workplace accidents, and improving working conditions. The sector also plays an important role in identifying cases of labour exploitation.

An update to the Manual is currently being prepared, which will include changes to the system for identifying victims of human trafficking. At present, the system is based solely on formal identification by the police. The revised system will also allow for the preliminary identification of potential victims, thereby ensuring faster access to protection and tailored support.

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

The official website of the Government of the Republic of Slovenia provides a wide range of information on the criminal offence of human trafficking both in Slovenian<sup>7</sup> and English<sup>8</sup>. The website also allows anonymous reporting and provides contact details of authorities/organisations to which individuals can report suspected cases. In addition to the police, these include contact information for non-governmental and humanitarian organisations that assist trafficking victims in Slovenia.

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<sup>6</sup> Available at: <https://www.gov.si/assets/vladne-sluzbe/UKOM/Boj-proti-trgovini-z-ljudmi/Dokumenti/Prirocnik-o-identifikaciji-pomoci-in-zasciti-zrtev-trgovine-z-ljudmi.pdf> (Only in Slovene)

<sup>7</sup> <https://www.gov.si/zbirke/projekti-in-programi/boj-proti-trgovini-z-ljudmi/>

<sup>8</sup> <https://www.gov.si/en/registries/projects/combating-trafficking-in-human-beings/#:-:text=In%20Slovenia%2C%20assistance%20to%20the,programmes%20for%20victims%20of%20trafficking.>

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?

During routine border checks, the police also carry out targeted checks and, where necessary, conduct in depth interviews with passengers. If there are reasonable grounds to suspect that a person is a victim of human trafficking, the border police officer immediately informs the specialised criminal investigation unit to initiate further action. A non-governmental organisation providing assistance to trafficking victims is also notified and, where required, social services are contacted to ensure that the potential victim receives accommodation, interpretation, and medical and legal assistance.

Ministry of the Interior officials responsible for processing applications for international protection are trained to recognise indicators of human trafficking. Where there are indications that human trafficking may be involved, applicants for international protection are asked additional questions, based on which a decision whether the competent authorities should be notified of the suspected human trafficking case is made. In all cases of suspected human trafficking, the police are notified, and confirmed suspicion is taken into account in the international protection procedure. All officials involved in the international protection procedure receive regular training on human trafficking. The most recent training, conducted in May 2024 through the European Union Agency for Asylum (EUAA) online training programme, provided refresher information on indicators, measures and common pitfalls, and the appropriate response to suspected cases of human trafficking.

Asylum Centre staff are also trained to recognise indicators of human trafficking among applicants for international protection, with particular attention given to unaccompanied minors, women and migrant workers.

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

Regular training on THB is provided at the Centre for Foreigners, ensuring that all employees are familiar with the indicators and able to identify potential victims based on these indicators. At present, no specialised THB training is provided for prison staff.

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.

Within the framework of state-funded assistance programmes, service providers are, in principle, able to accommodate and support all of the aforementioned categories of vulnerable persons. Where necessary, alternative accommodation can also be arranged and financed. For victims with severe mental and physical trauma, solutions are typically sought within specialised institutions. In Slovenia, there are two shelters that provide specialised assistance – one for women with addictions and the other for persons with physical disabilities.

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?

The Republic of Slovenia recognises the importance of reintegrating trafficking victims into society and enabling them to live independently, free from violence, exploitation and human rights violations. As part of the crisis accommodation programme, an individual assistance plan is drawn up for each victim, aimed at their resocialisation and revitalisation. Socialisation and revitalisation measures are intensified later on as part of support in a safe accommodation, where various activities promoting education, training, expanding social networks, acquiring a vocational training, and seeking employment opportunities take place.

Since 2019, the Ministry of the Interior has financed the (Re)integration of Victims of Human Trafficking project, also supported by European funds under the EU Internal Security Fund. Since October 2024, the programme "Continuation of the Protection of Victims of Human Trafficking and Their (Re)integration in the Republic of Slovenia for the 2024–2027 period" has been implemented, with a budget of EUR 150,000. The programme is being carried out by the Ključ Society on the basis of a public tender. It is intended for citizens of the Republic of Slovenia who have been identified as trafficking victims abroad, as well as for EU and third country nationals who have been identified as trafficking victims during pre-trial or criminal proceedings in the Republic of Slovenia and legally reside in Slovenia. In 2022, eight persons were included in the programme, ten in 2023, and nine in 2024. Participants received comprehensive psychosocial support, accommodation in supported housing, assistance with documentation, education, and access to safe employment, were accompanied to institutional appointments and participated in individual and group counselling activities.

The identification, assistance and protection of trafficking victims are carried out in accordance with the national referral mechanism as set out in the Manual.

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.

On 30 March 2021, the National Assembly of the Republic of Slovenia adopted the Act Amending the Foreigners Act (ZTuj-2). The amendment to the first paragraph of Article 50 introduced a new ground on which the police may grant a victim of human trafficking (and a victim of domestic violence) a 90-day stay due to personal circumstances that justify the victim's stay in the Republic of Slovenia. In addition, on the basis of the existence of personal circumstances justifying the victim's stay in the Republic of Slovenia, victims of human trafficking (and victims of domestic violence) may also obtain a temporary residence permit. A permit issued on the basis of personal circumstances is issued to the beneficiary for the duration of these circumstances, but for no longer than one year, with the possibility of extension for up to one year.

While the competent authorities have not yet dealt with such a case in practice, the condition of personal circumstances is interpreted in terms of reasons of safety (risk of retaliation, victim endangerment or revenge by perpetrators), health reasons, family circumstances and the like.

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 Slovenia, legislation ensures that the identity of child victims of human trafficking remains confidential. The Criminal Procedure Act prohibits the disclosure of information that could allow the identification of a child who is a victim of a criminal offence (Article 295 and 250.a(4)), and

proceedings are closed to the public when minors are involved. In addition, the Criminal Code stipulates that the disclosure of personal data of child victims is a criminal offence (Article 143(3)), while the Personal Data Protection Act (Official Gazette of the Republic of Slovenia, Nos. 163/22 and 40/25 – ZInfV-1) prohibits the processing and public disclosure of the personal data of anyone – including children – without an appropriate legal basis (in particular Article 6(2)).

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

The media in Slovenia are obliged to protect the privacy of victims within the framework of the applicable and established systemic legislation (Obligations Code, Criminal Code, Criminal Procedure Act, etc.). In addition, Article 52 of the Media Act of 2025 (Official Gazette of the Republic of Slovenia, No. 69/25 – ZMed-1) contains special protective provisions for children, who are the most vulnerable group of potential victims of human trafficking.

*“Article 52  
(protection of children)*

(1) Children and minors are guaranteed special protection and care under this Act. The interests of children take precedence over all other rights and considerations under this Act.

(2) It is prohibited to harm the physical, mental or moral development of children in the media. Programme content that could seriously harm their physical, mental or moral development (in particular pornography and gratuitous violence) may only be provided in the media in such a way that children cannot access it under normal circumstances (e.g. by means of appropriate technical measures or technical protection).

(3) Children shall not be exposed in the media to arbitrary or unlawful interference with their privacy, family or home, or to unlawful attacks on their honour and reputation. When gathering information, reporting and publishing photographs, and quoting statements concerning children, journalists must show particular consideration and must not, under any circumstances, harm the interests of the child.”

In addition, Article 22 of the Slovenian Journalists' Code stipulates that journalists may not reveal the identity of victims and their relatives in reports on sexual abuse and family tragedies, nor may they reveal the identity of perpetrators if doing so would reveal the identity of the victims. The same applies to reports on other criminal offences involving minors. The identity may only be disclosed with the consent of an adult victim.

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?

No such cases were recorded during the reporting period, but in the past the Slovenian police had detected several cases at foreign diplomatic missions in Slovenia where persons employed at diplomatic missions were exploited as domestic help. As diplomats in Slovenia enjoy immunity from criminal prosecution under the Vienna Convention on Diplomatic Relations, only support to victims was provided in these cases.

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

To date, there have been no reported cases in Slovenia of individuals being recruited or exploited by terrorist or armed groups, therefore the Republic of Slovenia has not adopted any specific measures in this area.

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?

On 26 March 2024, the National Assembly of the Republic of Slovenia adopted the Act Implementing Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on the Digital Services Act (Official Gazette of the Republic of Slovenia, Nos. 30/24 and 95/24 – ZIUETDS). The Agency for Communication Networks and Services of the Republic of Slovenia (hereinafter: AKOS), which is also the coordinator of digital services, is primarily responsible for supervising the provisions of the Regulation. In cases where the supervision of the implementation of the Act also relates to the protection of personal data, the agency consults with the Information Commissioner.

Article 8 of the ZIUETDS stipulates that if AKOS or the Information Commissioner (hereinafter: the supervisory authority) becomes aware of circumstances indicating a possible violation of the provisions of Regulation 2022/2065/EU, it shall notify the intermediation service provider thereof in writing and give it the opportunity to comment on the matter within a reasonable period of time. After receiving a response or after the expiry of the deadline for a response, the supervisory authority may request that the violation be brought to an end immediately or within a reasonable period of time and, at the same time, take appropriate and proportionate measures to ensure that the irregularities are remedied.

If the supervisory authority has evidence of a violation that poses a risk of serious harm to service recipients, it may take urgent interim measures to remedy the situation. In this case, the intermediation service provider shall have the opportunity to comment on the matter and propose a solution only after the urgent temporary measures have been taken.

The supervisory authority may issue a special decision requiring the intermediation service provider to comply with the decision referred to in Article 8 of the Act or to cooperate in the supervisory procedure in accordance with the provisions of the Act governing inspection supervision. In the decision, it shall set an appropriate deadline for compliance with the said decision or for cooperation in the supervisory procedure in accordance with the provisions of the law governing inspection supervision, and shall warn the intermediation service provider that a fine may be imposed. If the intermediation service provider fails to comply with the decision, the supervisory authority may issue a decision imposing a fine of up to EUR 50,000.

At the same time as issuing the decision referred to in the previous paragraph, the supervisory authority shall set a new deadline for the cessation of the violation. If the intermediation service provider continues to act contrary to the decision and does not cooperate in the supervisory procedure, the supervisory authority shall impose another fine until the total amount of the fines imposed by individual decisions reaches five per cent of the average global daily turnover or revenue in the previous financial year on the date calculated from the date specified in the decision.

However, if the procedural options for removing illegal content under Regulation 2022/2065/EU have been exhausted and no other law provides otherwise, the decision on the removal of illegal content shall be taken exclusively by the district court with territorial jurisdiction, namely the District Court in Nova Gorica (Article 17 of ZIUETDS).

Measures to detect online content related to human trafficking are implemented in cooperation with online providers and in accordance with the national referral mechanism as set out in the Manual.

### 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.

"Abuse of a position of vulnerability" has not been formally introduced into Slovenian legislation; instead, a corresponding explanatory concept (and sign of a criminal offense) is used, namely "exploitation of a subordinate or dependent position," which represents a qualifying circumstance of the criminal offence of trafficking in human beings, regulated in Article 113(2) of the Criminal Code.

As part of a project implemented on the basis of a public call for the selection of research projects within the Target Research Programme, co-financed by the Slovenian Research and Innovation Agency (ARIS) and the Ministry of the Interior, the Institute of Criminology at the Faculty of Law in Ljubljana is expected to prepare by the end of 2025 an analysis of THB-related cases resolved with a final judgment in the period from 2014 to 2023. The analysis will provide a better understanding of how Slovenian public prosecutors and courts deal with these cases and what sanctions they impose on perpetrators. The research will also focus on a normative analysis of legal provisions, in particular Article 113 of the Criminal Code, which defines the criminal offence of trafficking in human beings. Based on the research, specific recommendations for possible legislative changes and improvements to judicial procedures will be prepared.

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

See the answer to question 32 above.

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?

The abuse of a position of vulnerability of victims is manifested in case law particularly in the context of the exploitation of a subordinate or dependent position of the victim by the perpetrator of the criminal offence, for which Slovenian law provides for a higher penalty under Article 113(2) of the Criminal Code.

Problems often arise in prosecution because, in the Republic of Slovenia, the basic form of the criminal offence of trafficking in human beings under Article 113(1) of the Criminal Code does not define abuse

of vulnerability (or exploitation of a subordinate or dependent position) as a statutory characteristic of the basic form of the criminal offence. Thus, the basic form of the offence can also be committed without abuse of vulnerability (or any other means such as force, threat, deception, abduction, etc.). It is sufficient to demonstrate control over the victim of the offence.

According to the definition of the aggravated criminal offence of trafficking in human beings under Article 113(2) of the Criminal Code, the form of vulnerability itself is not important; what is important is that a subordinate or dependent relationship was established between the victim and the perpetrator. However, the concepts of "abuse of a position of vulnerability" and "exploitation of a subordinate or dependent position" could be considered synonymous, as it would be difficult in practice to find cases where a subordinate or dependent position could be established without exploiting a specific vulnerability of the victim.

Due to the aforementioned difference or exclusion of means from the basic form of the criminal offence in the Criminal Code, at first glance it appears that it is much easier to prosecute the criminal offence of trafficking in human beings in the Republic of Slovenia, as the basic form of the offence does not require proof of the means that enabled the exploitation of the victim. However, this particularity makes it much more difficult to determine whether the perpetrators' actions constitute the basic form of the criminal offence of human trafficking or some other criminal offence (e.g. exploitation of prostitution under Article 175 of the Criminal Code, violations of fundamental employee rights under Article 196 of the Criminal Code).

In the case of the basic form of the criminal offence of trafficking in human beings under Article 113(1) of the Criminal Code, it is not necessary to prove the abuse of a position of vulnerability, but only the exploitation of the victim. However, if the perpetrator is prosecuted for an aggravated form of this criminal offence, it must be proved that the perpetrator was aware of the abuse of a position of vulnerability or the exploitation of a subordinate or dependent position. This means that the perpetrator had to be aware that they had a certain power over the victim or that the victim was in a subordinate or dependent position, and that they intentionally exploited or abused this situation. The courts require proof that the defendant or perpetrator of the crime was aware of the vulnerability of the victim of human trafficking and that the victim was in fact in a subordinate or dependent position, because the perpetrator exploited their vulnerability to commit criminal offences.

The form of vulnerability most commonly exploited is the poor socio-economic status of victims, which is the basis of vulnerability on which perpetrators can establish and maintain a subordinate and dependent position that allows them to exploit the victim of the criminal offence. In Slovenian case law, this means that the perpetrator of the crime exploited the following personal circumstances that indicate the vulnerability of the victim of trafficking: poverty or economic vulnerability, social exclusion (e.g. lack of knowledge of the Slovenian language and society), personal characteristics of the victim (e.g. drug addiction) and problems faced by the victim in their country of origin, resulting in the victim's dependence on the perpetrator in the country of exploitation.

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 criminal police most often address the concept of vulnerability in their specialist training courses. Particular attention is paid to distinguishing between voluntary and apparent consent resulting from vulnerability. Vulnerability is particularly identified in proceedings involving foreigners, women, children, unaccompanied minors, persons with mental health problems and persons with disabilities.

An update of the Manual, which is an important tool for training experts in the field of combating human trafficking, is currently being prepared. In line with international guidelines, the updated Manual will address in detail the issue of vulnerability, the factors that influence individuals' exposure to becoming victims of human trafficking, and will define vulnerable groups.

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?

Slovenia has established a multi-level system for the protection of vulnerable victims of human trafficking: from early assessment of the victim's vulnerability and needs, special hearings and safeguards in court proceedings to long-term protection (legal aid, residence permits, psychosocial support).

Measures to protect vulnerable victims in the Republic of Slovenia are primarily determined in the Criminal Procedure Act, including the hearing of vulnerable victims via video conference or using technical means, limiting the number of victim hearings, hearing victims in the presence of an expert, such as a psychologist or social worker, excluding the public from the trial when necessary to protect the interests of the victim, and hearing without the defendant being present.

During the pre-trial proceedings, the criminal police pay special attention to the individual assessment of the vulnerability of the victim, who is interviewed in a safe environment, if necessary, in the presence of an interpreter or translator, and may also be accompanied by a trusted person or a representative of a non-governmental organisation.

Victims of human trafficking who are minors enjoy special protection, and measures for their protection are regulated, inter alia, by the Protection of Children in Criminal Procedure and their Comprehensive Treatment in Children's House Act (Official Gazette of the Republic of Slovenia, No. 54/21, hereinafter: ZZOKPOHO), which provides for special ways of involving minor victims in criminal proceedings (e.g. hearing with the assistance of an expert, separate rooms for hearings and a ban on personal contact with suspects, audio and video recording of questioning, provision of psychosocial assistance, etc.). This is the so-called "Barnahus" model. The Children's House is a place where children who are witnesses or victims of serious crimes, including human trafficking, are offered help and support and are questioned for the purposes of court proceedings. The proceedings take place in one location, in a child-friendly and safe environment. In addition to the professionals employed by the Children's House, representatives of the judiciary, the prosecution, the police, the social services and the health services also cooperate with the Children's House.

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 a criminal offence in Slovenia under the conditions set out in Article 113(4) of the Criminal Code, which stipulates that "Whoever knows that a person is a victim of human trafficking and uses such services as a result of the exploitation of this person described in paragraphs one and two of this Article shall be sentenced to imprisonment for up to three years and imposed a fine."

According to the legal definition of the criminal offence, prosecution of a user of services is only possible if they were aware that they were exploiting the services of a person who is a victim of trafficking in human beings, i.e. that they acted with intent. Such cases do exist in practice, but there are complications in gathering evidence of the perpetrator's intent. To date, it has not been possible in individual cases to prove beyond reasonable doubt that the user knew and intentionally used the services of a victim of human trafficking, and consequently there is no case law. For example, users

of sexual services provided by prostitutes are aware that this is prostitution or even exploitation of prostitution (a criminal offence under Article 175 of the Criminal Code), but they are not aware of the circumstances described as statutory characteristics of trafficking in human beings.

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 Slovenian criminal police use analytical and digital tools to analyse communication data and have digital forensics and tools to enable financial flows. They also monitor online platforms and employment portals in cooperation with other state authorities. The police also cooperate internationally in this area (e.g. joint EMPACT THB action days), where activities related to databases and tools for identifying victims of human trafficking in the digital world are carried out.

On the other hand, state prosecutors investigating human trafficking offences do not have any special applications or tools at their disposal. Training at the national level is mostly organised by the Ministry of the Interior, and partly also by the Supreme State Prosecutor's Office of the Republic of Slovenia as part of prosecutor training days, while prosecutors also take part in various online training courses (e.g. HELP online training within the framework of the Council of Europe). Certain training courses on trafficking in human beings also cover topics related to the communication and information technology used in the commission of the criminal offence of human trafficking.

State prosecutors also take part in certain international training courses. For example, a state prosecutor of the Specialised State Prosecutor's Office of the Republic of Slovenia participated in the OSCE Regional Workshop in Tallinn in June 2023 (Regional Workshop to Address Technology-Facilitated Trafficking in Human Beings, 19-21 June 2023, Tallinn, Estonia).

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 Slovenian police apply the provisions of the Budapest Convention when investigating criminal offences of human trafficking, particularly in the field of information technology and the internet and the use of communication tools. In the field of cybercrime, uniform standards for criminal offences and procedural powers have been introduced, covering the seizure, interception and storage of data, and mutual cooperation has been established to respond more effectively to such offences.

When dealing with cases with an international element, public prosecutors also apply the Council of Europe Convention on Cybercrime, but so far it has not been applied in practice in relation to the prosecution of THB offences. Other legal bases (e.g. the European Investigation Order (EIO) in the case of EU Member States, requests for international legal assistance (MLA) under the Council of Europe Convention on Mutual Assistance in Criminal Matters, etc.) were used to obtain digital evidence from other countries or directly from online service providers. In any case, prosecutors of the Specialised State Prosecutor's Office are aware that digital evidence can be obtained from abroad on the basis of the Budapest Convention and that Article 26 of that Convention also allows for spontaneous exchange of information.

## 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 accordance with the provisions of the Legal Aid Act (Official Gazette of the Republic of Slovenia, No. 96/04 – official consolidated text, 23/08, 15/14 – decision of the Constitutional Court and 19/15), in particular Article 31.a of the said Act, which broadly defines the application of the Act also to foreigners, stateless persons, etc. – the said Act is also applicable to them.

- facilitate and guarantee effective access to compensation for victims of THB;

In 2023, the Crime Victims Compensation Act was amended (amendments in: Official Gazette of the Republic of Slovenia, No. 67/23, hereinafter: ZOZKD), which abolished a significant and harmful shortcoming of the aforementioned Act with regard to the state compensation scheme (for violent criminal offences), namely the formal requirement of citizenship of the Republic of Slovenia or citizenship of another Member State of the European Union in order to file a claim for compensation. This condition was detrimental to the acquisition of compensation for victims of trafficking in human beings, who are predominantly third-country nationals. Following the abolition of this condition, third-country nationals also became eligible for compensation under the state compensation scheme under the ZOZKD, which means that they can now submit claims for compensation.

The situation in the Republic of Slovenia as on 8 October 2025 shows that, unfortunately, not a single victim of trafficking has submitted a claim for compensation. The Republic of Slovenia has attempted to achieve this through additional proactive measures and by encouraging non-governmental organisations to specifically inform victims of human trafficking about their right to compensation under the state compensation scheme and to encourage them to file claims. The competent services for victim support at district courts are also being nudged to inform victims and encourage them to file claims. The Republic of Slovenia will continue with these activities.

- ensure compliance with the principle of non-punishment of victims of THB for their involvement in unlawful activities, to the extent that they were compelled to do so, through the adoption of a specific legal provision and/or the development of guidance for police officers and prosecutors on the non-punishment provision;

The Republic of Slovenia still considers that the general Article 23 of the Criminal Code is sufficient with regard to the concept of coercion ("Any act committed under coercion that the perpetrator is not able to resist shall not constitute a criminal offence"). We would also like to emphasise that, in practice, victims of trafficking in human beings have not been punished for possible involvement in criminal acts of trafficking, which shows that the legal system and the judiciary of the Republic of Slovenia have responded appropriately to this issue.

Nevertheless, the Republic of Slovenia will take this recommendation into account by devoting a special chapter to this issue when updating the Manual, which is planned for the end of this year. At the same time, the issue will be thoroughly examined in the next amendments to the Criminal Code.

- extend the application of the procedural protection measures currently reserved to children under the age of 15 years to cover all child victims and witnesses of THB up to the age of 18;

The Republic of Slovenia will examine the recommendation when amending criminal procedure or related legislation.

- intensify efforts to prevent and combat THB for the purpose of labour exploitation;

In the Republic of Slovenia, forced labour is a less identified form of trafficking in human beings, as under current legislation, when a form of labour exploitation is detected, a statutory characteristic of forced labour must also be identified and proved, which causes difficulties in practice. As a result, investigations into suspected trafficking involving labour exploitation are often reclassified in practice as other officially prosecutable offences, in particular violations of the fundamental employee rights under Article 196 of the Criminal Code.

In 2023, the Ministry of the Interior therefore prepared an analysis of the legislation of EU Member States regarding the concept of forced labour and labour exploitation in connection with the criminal offence of trafficking in human beings. The analysis shows that most EU Member States have broadened the definition of THB in their national legislation to include other forms of labour exploitation in addition to forced labour. In view of the above, on 23 October 2023, the National Coordinator for Combating Trafficking in Human Beings submitted a proposal to the Ministry of Justice to amend Article 113 of the Criminal Code so that the provisions are better suited to today's challenges and comparable to those of countries that are more successful than Slovenia in detecting, investigating and prosecuting these crimes. An additional basis for possible legislative changes will be a study being prepared by the Institute of Criminology at the Faculty of Law in Ljubljana, which will also focus on a normative analysis of legal provisions, in particular Article 113 of the Criminal Code (more information in the answer to question 32).

Due to increased migration flows and labour shortages, foreign workers, mainly citizens of distant third countries such as India, Bangladesh, Nepal, the Philippines, Egypt, Pakistan and Uzbekistan, represent an increasing proportion of the workforce. These workers may be employed by Slovenian employers or by employers from other EU countries who post them to work in the Republic of Slovenia. They are an extremely vulnerable group due to cultural and linguistic differences, distance from their home countries, limited knowledge of the Slovenian legal system and their rights. In view of this, the IRSD paid particular attention in its 2025 Programme Guidelines to respecting the rights of foreign workers from third countries, supervising the provision of cross-border services and the concept of provision of manpower, thereby preventing the illegal lending of workers. The IRSD therefore carries out systemic and other types of supervision to check compliance with regulations in these areas.

In accordance with the action plans to combat trafficking in human beings, annual training courses were held for employees of the Labour Inspectorate and the Financial Administration of the Republic of Slovenia, both in Slovenia and abroad. At the invitation of the OSCE Special Representative and Coordinator for Combating Trafficking in Human Beings, inspectors of the IRSD also attended a workshop on strengthening the capacity of labour inspectors in identification and referral victims of human trafficking stemming from the humanitarian crisis, which took place on 4 and 5 June 2025 in Vienna, Austria.

Between 17 February and 17 April 2025, the IRSD carried out a targeted inspection campaign on labour legislation and occupational health and safety regulations at employers in the road freight transport sector. As a large number of foreigners are employed in this sector, particular attention was paid to checking compliance with the provisions of the Employment, Self-Employment and Work of

Foreigners Act. At the beginning of 2025, several inspectors were trained to monitor working hours using recording equipment (tachographs).

Since 2016, the Police and IRSD have participated in joint European action days to combat trafficking in human beings. This year, another such campaign (JAD) will be organised, which is expected to take place in the construction industry. Construction remains an activity in which violations of workers' rights in the field of labour law are frequently found and therefore poses a risk of THB in the area of labour exploitation.

Activities are also currently underway to upgrade the existing 2015 agreement and operational protocol on cooperation and information exchange between the Police and the IRSD. The authorities will continue to strive for more intensive cooperation in terms of setting common goals and increasing the number of joint inspections with uniformed police and trainings within the limits of their staffing capacities.

In addition to the Organised Crime Division, violations of employment rights are also dealt with by officers of the Economic Crime Division, as well as uniformed police and officers responsible for compensatory measures. In order to better identify trafficking in human beings, additional training for both police officers and inspectors is planned for this year.

In order to prevent the exploitation of workers, the Employment Service of Slovenia (ESS) maintains and publishes a register of employers with negative references.<sup>9</sup> Under the Labour Market Regulation Act, the ESS is not obliged to publish job vacancies for these employers or to refer candidates for employment to them, in order to protect all job seekers, especially those from vulnerable groups. The register includes employers for whom:

- the Labour Inspectorate has found violations of labour legislation;
- the Financial Administration of the Republic of Slovenia has imposed final penalties for violations of the Prevention of Undeclared Work and Employment Act;
- the Financial Administration of the Republic of Slovenia has found that REK forms (withholding tax return for the income from employment) have not been submitted or that mandatory social security contributions have not been paid;
- it was established, on the basis of an employee's report, that the employer does not comply with labour legislation, i.e. it dismisses employees in contravention of regulations or grossly violates the employees' labour rights.

The ESS also publishes the list of employers who are banned from employing foreigners.<sup>10</sup>

Other measures implemented by the ESS to prevent trafficking in human beings for the purpose of forced labour include:

- training and awareness raising of staff involved in the procedures for issuing consents and work permits on trafficking in human beings and the potential risks that employees may encounter when conducting procedures;
- thorough checks of employers and the documentation they submit,
- conducting interviews with foreigners through diplomatic and consular missions,
- verification of authenticity of the submitted evidence through the Ministry of Foreign and European Affairs,
- verification of the employer's employment needs (the Employment Service of Slovenia requires evidence that the foreigner will actually work in the Republic of Slovenia within the framework of the employer's projects),

<sup>9</sup> Can be accessed here: <https://www.ess.gov.si/iskalci-zaposlitve/iskanje-zaposlitve/iskanje-delodajalcev/delodajalci-z-negativnimi-referencami/#/>

<sup>10</sup> Can be accessed here: <https://www.ess.gov.si/iskalci-zaposlitve/zaposlitev-tujih-drzavljanov/prepoved-zaposlovanja-tujcev/#:~:text=2025%2C%20je%20dolo%C4%8Dila%20novo%20uradno,in%20odvra%C4%8Danja%20od%20novih%20kr%C5%A1itev>

- cooperation with the competent law enforcement authorities and non-governmental organisations involved in combating human trafficking in cases where human trafficking is suspected,
- in order to protect victims, the ESS directs potential victims to get appropriate support, treatment and safe shelter, and arranges for the rapid issuance of consent so that they can change employers,
- informing migrant workers about fair and legal employment,
- ESS employment events in countries of origin, where potential verified employers, trade unions and workers' rights advocates are invited to present work and residence in the Republic of Slovenia to foreigners on site.

The Global Classroom is based on a partnership between various organisations that provide support to immigrants to facilitate their integration into the labour market and society in general within the framework of the LABOUR-INT III project.<sup>11</sup>

- ensure that all foreigners for whom there are reasonable grounds to believe that they are victims of trafficking, including EU citizens, are provided with a recovery and reflection period.

Chapter IV of the Manual (Accommodation of victims of human trafficking) stipulates that victims of trafficking in human beings are entitled to assistance and support as soon as there are reasonable grounds to believe that they are victims of trafficking in human beings. All victims, regardless of their nationality, are thus guaranteed a 30-day recovery and reflection period to recover and free themselves from the influence of traffickers and to familiarise themselves with voluntary forms of further assistance programme and the possibilities for cooperation with state authorities.

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

- emerging trends of trafficking in human beings;

In the area of investigating THB offences, the Police have noted that the trend of previous years is continuing, with the Republic of Slovenia still being a destination country for the exploitation of victims. The most common form of exploitation is still prostitution and sexual abuse, but recently there has been an increase in the number of cases of labour exploitation. There is no information to suggest that Slovenia is a country of origin of victims of trafficking who are exploited in other EU Member States or third countries. However, Slovenia is still a transit country through which potential victims pass.

In 2022, 5 victims of trafficking in human beings were identified, in 2023 21, and in 2024 17. All victims were adult women, predominantly third-country nationals, mostly from South-Eastern Europe. In almost all cases, the victims were exploited for prostitution and sexual abuse, and in two cases for forced marriage.

- the legislation and regulations relevant to action against THB;

In order to strengthen cooperation with the countries of origin of THB victims, a Protocol on Cooperation in the Fight against Human Trafficking and Child Abuse was signed with the Republic of North Macedonia on 18 March 2022. The Protocol regulates areas related to the prevention of trafficking in human beings, identification, referral, protection and voluntary return of victims, and the protection of children who are victims of all forms of abuse.

<sup>11</sup> More at: <https://www.ess.gov.si/partnerji/projektno-sodelovanje/projekt-labour-int-iii/>

On 27 January 2023, the National Assembly of the Republic of Slovenia adopted an amendment to the Criminal Code (KZ-1), transposing the provisions of Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims.

Thus Article 113 of the Criminal Code, which defines the criminal offence of trafficking in human beings, is amended so that it includes begging among the forms of exploitation, as defined in the Directive. In addition, the wording "slavery-like conditions" is added to the first paragraph of Article 113, which includes, among other things, debt bondage, serfdom, the sale of a woman for marriage, the handing over of a woman to another person for a certain equivalent, the situation in which a woman belongs to another person after the death of her husband, and the handing over of a child to another person for the purpose of exploitation of the child or of the child's labour, which also corresponds to the definition under the Directive. A new sixth paragraph is added to the Article, which establishes as a qualified form of the offence the commission of the offence by an official or public servant in the performance of their duties.

In addition, the offences of enslavement under Article 112 of the KZ-1 and trafficking in human beings under Article 113 of the KZ-1 are added to the offences referred to in Paragraph 3 of Article 90, for which the statute of limitation starts to run from the date on which the victim reaches the age of majority, and not from the date on which the offence is committed.

On 28 June 2023, the National Assembly of the Republic of Slovenia adopted the Act Amending the Crime Victims Compensation Act, which extends the right to compensation to victims of criminal offences to third-country nationals. The amendment thus removes the formal requirement of Slovenian or other EU citizenship for obtaining compensation under this Act and provides for compensation from the state scheme regardless of the victim's citizenship. In addition, the amendment introduces the possibility for the claimant to waive the appeal, thereby ensuring faster finality and legal validity of the decision and thus facilitating the acquisition of compensation.

On 22 September 2023, the National Assembly of the Republic of Slovenia adopted a Resolution on the National Programme for Equal Opportunities for Women and Men 2023-2030. The resolution is a strategic document defining the objectives, measures and key policy makers in the area of equal opportunities for men and women in particular spheres of life in Slovenia for the period from 2023 to 2030. The document also includes activities in the field of combating trafficking in human beings.

On 26 April 2024, the National Assembly of the Republic of Slovenia adopted the Resolution on the National Programme for the Prevention and Suppression of Crime for the period 2024–2028 (EPA 1360-IX) (Official Gazette of the Republic of Slovenia, No. 38/24). The resolution highlights the issue of human trafficking in several places, e.g. in preventive action, threats to public health, in prevention strategies/programmes (prevention of trafficking in human organs, tissues and blood, prevention, detection and investigation of cybercrime, within the framework of the European Multidisciplinary Platform Against Criminal Threats – EMPACT 2022+), etc.

In 2024, a public call for proposals was launched to select research projects within the framework of the Target Research Programme (CRP 2024), which are co-financed by the Slovenian Research and Innovation Agency. The motivation for the project is the decrease in the number of convictions in the area of trafficking in human beings in recent years and differences in case law on THB offences handled by specialized departments of district courts at the seats of higher courts (in Ljubljana, Maribor, Celje and Koper) in recent years, which indicates the need for a comprehensive and in-depth expert analysis of criminal legislation and judicial practice in this area over the last ten years. The aim of the analysis is to objectively examine the actual situation and provide

recommendations for more effective prosecution of such crimes, including proposals for possible legislative changes. The Institute of Criminology at the Faculty of Law in Ljubljana was selected to carry out the research project, which will be completed by the end of 2025.

A broader amendment of the Criminal Code is planned for 2026, which will include changes to Article 113 (Trafficking in human beings) and, probably also Article 196 (Violation of fundamental employee rights). This is also linked to the future results of the analysis by the Institute of Criminology at the Faculty of Law in Ljubljana, mentioned in the previous paragraph.

- 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);

In 2003, the Government of the Republic of Slovenia established the Inter-Ministerial Working Group on Combating Trafficking in Human Beings, which is headed by the National Coordinator for combating Trafficking in Human Beings and whose members are representatives of relevant ministries and government services. Representatives of the Specialised State Prosecutor's Office of the Republic of Slovenia, the National Assembly of the Republic of Slovenia and civil society also participate in the work of the Working Group as independent external members. The decision on its composition is updated as necessary due to personnel changes, with the latest amendment adopted on 10 October 2024. On 27 March 2025, the Government of the Republic of Slovenia also appointed a new National Coordinator for Combating Trafficking in Human Beings.

The Working Group met three times in 2022, twice in 2023 and four times in 2024. It discussed current issues in the field of combating trafficking in human beings and adopted decisions for more effective implementation of policies in this area. During the reporting period, it prepared three annual reports on its work and two action plans to combat trafficking in human beings, the first for the period 2023–2024, which was adopted by the Government of the Republic of Slovenia on 26 January 2023, and the second for the period 2025–2026, which was adopted on 13 February 2025.<sup>12</sup>

The work of the Working Group was also marked by numerous activities in the field of coordinating actual cases of placement of THB victims in accommodation, which, in accordance with the Manual, are discussed and decided upon by a specially appointed multidisciplinary group.

During the reporting period, there were several meetings of the core Working Group to discuss issues related to forced labour, and one in 2022 to plan preventive activities aimed at informing Ukrainian citizens and raising awareness among the general public about trafficking in human beings. There was a core Working Group meeting in 2023 to seek a systemic solution for the placement and care of children who have experienced human trafficking, and the following steps to address the issue were agreed on. In 2024, a meeting of the core Working Group was convened to discuss the adequacy of the identification and protection of presumed victims of trafficking among minor applicants for international protection. Further steps to address the issue were agreed upon.

Slovenia has not yet established the role of a national rapporteur for combating trafficking in human beings, who could provide an independent assessment of the work of the Working Group and the implementation of the action plan to combat human trafficking. It is envisaged that the Office of the Human Rights Ombudsman will take on the role of national rapporteur. In this light, a draft amendment to the Human Rights Ombudsman Act was prepared in 2024, but the legislative process has not yet been completed.

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<sup>12</sup> All documents are accessible here: <https://www.gov.si/zbirke/delovna-telesa/medresorska-delovna-skupina-za-boj-proti-trgovini-z-ljudmi/> (in Slovenian) and here: <https://www.gov.si/en/registries/working-bodies/the-national-working-group-for-combating-trafficking-in-human-being/> (in English).

- 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);

The Action Plan to Combat Trafficking in Human Beings for the period 2025-2026 details the activities that will be carried out in the Republic of Slovenia in the entire field of combating trafficking in human beings in the next two-year period. The document is a logical continuation of existing projects that have proven successful and, due to the nature of the work, require continuity. It also draws on past experience and new ideas to design activities that build on the work done so far. The Action Plan follows the measures set out in the EU Strategy on Combating Trafficking in Human Beings (2021-2025) and takes into account the recommendations and guidelines of international institutions working in this field, in particular the recommendations of the GRETA monitoring mechanism on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings.

The plan is divided into six chapters: Prevention; Detection, investigation and prosecution of trafficking in human beings; Identification, protection and assistance to victims of trafficking in human beings; Participation in regional and international organisations for the prevention and combating of trafficking in human beings; Systemic improvements and legislative proposals; and Coordination and support activities. Each chapter defines a set of specific tasks, specifying the responsible institution, participating partners and the timeframe for completion.

In the area of prevention, in addition to established activities, the current action plan also focuses on preventive measures in the area of raising awareness and preventing trafficking in human beings among persons with disabilities. In the area of detection, investigation and prosecution, special guidelines are to be prepared for the Financial Administration of the Republic of Slovenia, which will help employees of this institution to identify indicators of trafficking in human beings. Guidelines will also be prepared for consular staff, who are often the first point of contact with potential victims abroad.

In the area of victim assistance and protection, an important development is an increase in funds for victim reintegration and for the PATS programme with the help of EU funds. Funding has also been increased in the area of cooperation in regional and international organisations, where Slovenia will continue its activities in the informal network of national coordinators of the South-East European region for combating trafficking in human beings, which will be financed under the EU4FAST project until mid-2027. In this context, a new regional strategy for 2025-2029 has already been prepared and was presented at the meeting of interior ministers within the Brdo Process in March 2025. In the area of improving systemic solutions and legislative changes, an expert analysis of criminal legislation and case law in this area over the last ten years will be carried out by the end of 2025, which will provide recommendations for more effective prosecution of such crimes, including proposals for possible legislative changes. In addition, attention will also be focused in the future on measures to involve people with experience of human trafficking in the development of policies and measures in this area.

The activities envisaged under the current action plan are estimated at EUR 591,920.

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

Since 2020, several court decisions have been rendered in Slovenia that have changed case law in the broader field of combating trafficking in human beings. In recent years, the courts have been handing down acquittals, even though in previous years they had handed down convictions in cases involving essentially the same facts. In some cases, the courts have also reclassified the alleged criminal offence of trafficking in human beings as a less serious offence (e.g. exploitation of

prostitution). An expert analysis is being prepared that will provide recommendations for more effective prosecution of such offences, including proposals for possible legislative changes. More on this in the answers to questions 32 and 41.b.

In 2021, 2022 and 2023, the courts did not hand down any convictions for the criminal offence of trafficking in human beings. In 2024, however, the courts of first instance issued one written conviction for the criminal offence of trafficking in human beings under Article 113 of the Criminal Code against one adult perpetrator and six convictions for the criminal offence of exploitation of prostitution under Article 175 of the Criminal Code against seven adult perpetrators.

The conviction for trafficking was passed in August 2024 against one natural person for committing two offences under Article 113(2) of the Criminal Code and Article 20 of the Criminal Code. The judgment is final, the individual was given a suspended sentence of 3 years and 1 month of imprisonment and a fine of EUR 6,000, which will not be imposed if the convicted person does not commit a new criminal offence during the probation period of four years. The perpetrator participated in the commission of the criminal offence by taking part in the recruitment, transport and accommodation of two victims from Hungary and in the overseeing of their exploitation for prostitution.

In a major high-profile case involving crimes under Articles 113 and 175 of the Criminal Code, in May 2024, the court handed down a judgment for exploitation of prostitution in a criminal organisation, namely for the exploitation of at least 417 victims, citizens of Romania. The written copy of the judgment from May 2024 was not received until July 2025 and comprises over 800 pages. The judgment is not yet final. The court imposed the following penalties on the four accused natural persons for the criminal offence under Article 175(3) of the Criminal Code: the first defendant was sentenced to four years and six months' imprisonment and a fine of EUR 30,000, the second and third defendants were sentenced to four years and four months' imprisonment and a fine of EUR 30,000 and EUR 21,000 respectively, and the fourth defendant was sentenced to two years and two months' imprisonment. The legal entity was fined EUR 100,000. According to the judgment, proceeds from the criminal offences amounted to over €4 million.

In this case, some of the defendants were also charged with the criminal offence of trafficking in human beings under Article 113 of the Criminal Code, but in November 2022 they were acquitted. In November 2023, the higher court upheld the acquittal.

In the same case, a judicial investigation is also underway against two natural persons for the alleged criminal offence under Article 113(5) in conjunction with Article 113(2) and (1) of the Criminal Code, which was also committed against Romanian citizens.

## Part III - Statistics on THB

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).

YEAR 2022:

TABLE 1: Number of identified victims of trafficking in human beings in 2022 by gender and nationality

NATIONALITY	MEN	WOMEN	TOTAL
Slovenia	0	2	2
Colombia	0	1	1
Venezuela	0	2	2
TOTAL	0	5	5

TABLE 2: Number of identified victims of trafficking in human beings in 2022 by gender and form of exploitation

FORM OF EXPLOITATION	MEN	WOMEN	TOTAL
Sexual exploitation	0	3	3
Forced marriage	0	2	2
TOTAL	0	5	5

TABLE 3: Number of identified victims of trafficking in human beings in 2022 by age

AGE GROUP	NUMBER OF PERSONS
07	1
14	1
18-24	2
24-34	1

TABLE 4: Number of potential victims of trafficking in human beings in 2022 by gender and nationality

NATIONALITY	MEN	WOMEN	TOTAL
India	9	0	9
China	1	0	1
Kosovo	1	0	1
Ukraine	1	0	1
Albania	0	1	1
Uganda	0	1	1
TOTAL	12	2	14

In 2022, no other data on potential victims were included in the annual statistics.

YEAR 2023:

TABLE 5: Number of identified victims of trafficking in human beings in 2023 by gender and nationality

NATIONALITY	MEN	WOMEN	TOTAL
Bosnia and Herzegovina	0	3	3
Montenegro	0	1	1
Croatia	0	1	1
China	0	1	1
Romania	0	1	1
Slovenia	0	1	1
Serbia	0	12	12
Ukraine	0	1	1
TOTAL	0	21	21

TABLE 6: Number of identified victims of trafficking in human beings in 2023 by gender and form of exploitation

FORM OF EXPLOITATION	MEN	WOMEN	TOTAL
Sexual exploitation	0	21	21
TOTAL	0	21	21

Of all identified victims, 20 were adults and one was a minor.

TABLE 7: Number of potential victims of trafficking in human beings in 2023 by gender and nationality

NATIONALITY	MEN	WOMEN	TOTAL
Bhutan	0	1	1
Philippines	0	2	2
Colombia	0	1	1
Germany	0	1	1
Nepal	0	4	4
Portugal	0	1	1
Romania	0	1	1
Slovenia	0	2	2
Spain	0	1	1
Sri Lanka	0	1	1
Sweden	0	1	1
Ukraine	0	42	42
Afghanistan	1	0	1
Portugal	1	0	1
TOTAL	2	58	60

In 2023, no other data on potential victims were included in the annual statistics.

YEAR 2024:

TABLE 8: Number of identified victims of trafficking in human beings in 2024 by gender and nationality

NATIONALITY	MEN	WOMEN	TOTAL
Bosnia and Herzegovina	0	1	1
Montenegro	0	2	2
Croatia	0	1	1
Colombia	0	1	1
Serbia	0	11	11
Unknown	0	1	1
TOTAL	0	17	17

TABLE 9: Number of identified victims of trafficking in human beings in 2024 by gender and form of exploitation

FORM OF EXPLOITATION	MEN	WOMEN	TOTAL
Sexual exploitation	0	17	17
TOTAL	0	17	17

All identified victims were adults (18+). All victims listed were identified by the police.

TABLE 10: Number of potential victims of trafficking in human beings in 2024 by gender and nationality

NATIONALITY	MEN	WOMEN	TOTAL
Bangladesh	1	0	1
Morocco	1	0	1
Romania	2	6	8
Syria	1	0	1
Slovenia	1	1	2
Turkey	1	0	1
China	0	4	4
Philippines	5	5	10
TOTAL	12	16	28

In 2024, no other data on potential victims were included in the annual statistics.

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

No victims of THB were identified in the asylum procedure in the period from 2022 to 2024.

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

TABLE 11: Number of victims of THB who received assistance in 2022

	GENDER	AGE	NATIONALITY	FORM OF EXPLOITATION	Internal/ Transnational trafficking
a) Crisis accommodation:					
1.	F	>18	Colombia	Sexual exploitation	Transnational
2	F	>18	Bosnia and Herzegovina	Sexual exploitation	Transnational
3	F	>18	Portugal	Sexual exploitation in cults	Transnational
4	F	>18	Germany	Sexual exploitation in cults	Transnational
5	F	>18	Venezuela	Sexual exploitation	Transnational
6	F	>18	Venezuela	Sexual exploitation	Transnational
b) Safe accommodation:					
1	F	>18	Colombia	Sexual exploitation	Transnational
2	F	>18	Bosnia and Herzegovina	Sexual exploitation	Transnational
3	F	>18	Portugal	Sexual exploitation in cults	Transnational
4	F	>18	Germany	Sexual exploitation in cults	Transnational
5.	F	>18	Venezuela	Sexual exploitation	Transnational
6	F	>18	Venezuela	Sexual exploitation	Transnational
c) Reintegration programme:					
1	F	>18	Madagascar	Forced labour	Transnational
2	F	>18	Colombia	Sexual exploitation	Transnational
3	F	>18	Slovenia	Sexual exploitation	Internal
4	F	>18	Slovenia	Sexual exploitation	Internal
5	F	>18	Slovenia	Sexual exploitation	Internal
6	F	>18	Slovenia	Sexual exploitation	Internal
7	M	>18	Slovenia	Sexual exploitation	Internal

8	F	>18	Ukraine	Sexual exploitation	Transnational
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TABLE 12: Number of victims of THB who received assistance in 2023

	GENDER	AGE	NATIONALITY	FORM OF EXPLOITATION	Internal/ Transnational trafficking
a) Crisis accommodation:					
1.	F	>18	Ukraine	Sexual exploitation	Transnational
2	F	>18	Serbia	Sexual exploitation	Transnational
b) Safe accommodation: In 2023, no victims of trafficking were included in the programme.					
c) Reintegration programme:					
1	F	>18	Madagascar	Forced labour	Transnational
2	F	>18	Colombia	Sexual exploitation	Transnational
3	F	>18	Palestine	Sexual exploitation	Transnational
4	F	>18	Venezuela	Sexual exploitation	Transnational
5	F	>18	Venezuela	Sexual exploitation	Transnational
6	F	>18	Slovenia	Sexual exploitation	Internal
7	F	>18	Slovenia	Sexual exploitation	Internal
8	F	>18	Slovenia	Sexual exploitation	Internal
9	F	>18	Slovenia	Sexual exploitation	Internal
10	F	>18	Ukraine	Sexual exploitation	Transnational

TABLE 13: Number of victims of THB who received assistance in 2024

	GENDER	AGE	NATIONALITY	FORM OF EXPLOITATION	Internal/ Transnational trafficking
a) Crisis accommodation:					
1.	F	>18	Slovenia	Sexual exploitation	Internal
2	F	>18	Philippines	Forced labour	Transnational
3	M	>18	Philippines	Forced labour	Transnational
4	M	>18	Philippines	Forced labour	Transnational
5	M	>18	Philippines	Forced labour	Transnational
6	M	>18	Philippines	Forced labour	Transnational
b) Safe accommodation:					

1	F	>18	Philippines	Forced labour	Transnational
2	M	>18	Philippines	Forced labour	Transnational
3	M	>18	Philippines	Forced labour	Transnational
4	M	>18	Philippines	Forced labour	Transnational
5	M	>18	Philippines	Forced labour	Transnational
c) Reintegration programme:					
1.	F	>18	Philippines	Forced labour	Transnational
2	M	>18	Philippines	Forced labour	Transnational
3	M	>18	Philippines	Forced labour	Transnational
4	M	>18	Philippines	Forced labour	Transnational
5	M	>18	Philippines	Forced labour	Transnational
6	F	>18	Palestine	Sexual exploitation	Transnational
7	F	>18	Madagascar	Forced labour	Transnational
8	F	>18	Slovenia	Sexual exploitation	Internal
9	F	>18	Slovenia	Sexual exploitation	Internal

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

We do not keep these statistics in the Republic of Slovenia. However, we emphasize that, in accordance with Article 257 of the Family Code, the court places under guardianship and appoints a guardian for every child who has no parents or whose parents do not take appropriate care for them. Furthermore, Article 270 of the Family Code stipulates that, unless otherwise provided by an international treaty, in urgent cases the social work centre or the court shall take, under the provisions of this Code, the necessary measures to protect the personality, rights, and interests of a foreign national until the competent authority of their country takes the appropriate action. This means that the court may also place a foreign national under guardianship.

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

A recovery and reflection period was granted to 14 persons, see data in Tables 11, 12 and 13.

- 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).

According to the Register of Foreigners, 6 temporary residence permits were issued to victims of THB between 1 January 2022 and 31 July 2025, i.e. 3 in 2022 and 3 in 2024.

Temporary residence permits for victims of trafficking were issued to three citizens of the Republic of the Philippines (one man and two women), one citizen of the Republic of Colombia and two citizens of the Bolivarian Republic of Venezuela. The victims were of legal age (between 20 and 40 years old) when the temporary residence permits were issued.

The temporary residence permits issued to victims of trafficking in human beings had a validity of one year.

TABLE 14: Number of temporary residence permits issued to victims of THB in the period from 1 January 2022 to 31 July 2025, broken down by victims' gender (M/F), nationality and age at the time of issuance of the temporary residence permit

Nationality of victim	Age of victim	2022		2023		2024		2025 (until 31 July)		Total
		M	F	M	F	M	F	M	F	
Republic of the Philippines	37					1				3
	38						1			
	39						1			
Republic of Colombia	28		1							1
Bolivarian Republic of Venezuela	21		2							2
Total		0	3	0	0	1	2	0	0	6
		3		0		3		0		

The Register of Foreigners does not contain information on the grounds for granting residence to victims of trafficking in human beings in the Republic of Slovenia (i.e. cooperation in criminal proceedings or the existence of special circumstances), nor does it contain information on the form of trafficking on the basis of which the victim was issued with this type of temporary residence permit, so the statistical data shown in the table cannot be broken down according to these criteria.

- 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).

We do not keep these statistics in the Republic of Slovenia.

- 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).

During the period in question, there were no victims of THB in the Republic of Slovenia who requested, received or were awarded compensation.

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

All victims received financial assistance in the form of a daily allowance under the programme "Providing assistance to victims of trafficking in human beings – placement in safe accommodation".

- Number of victims of THB who received free legal aid.

Victims received basic legal assistance but did not receive professional legal assistance provided by lawyers.

- Number of victims of THB who were returned or repatriated to/from your country (disaggregated by sex, age, country of destination, form of exploitation).

TABLE 15: Number of victims of THB who were returned to their country of origin

	GENDER	AGE	NATIONALITY	FORM OF EXPLOITATION	Internal/transnational trafficking
1	Ž	>18	Venezuela	Sexual exploitation	Transnational
2	Ž	>18	Venezuela	Sexual exploitation	Transnational
3	Ž	>18	Colombia	Sexual exploitation	Transnational
4	Ž	>18	Bosnia and Herzegovina	Sexual exploitation	Transnational
5	Ž	>18	Germany	Sexual exploitation	Transnational
6	Ž	>18	Portugal	Sexual exploitation	Transnational

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

TABLE 16: Number of investigations into cases of THB between 2022 and 2024

Criminal offence	2022	2023	2024
Trafficking in human beings (Article 113 of the Criminal Code)	6	74	43

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

Criminal proceedings were initiated or were ongoing in six cases involving THB. All of these cases involved exploitation of prostitution, with a total of 15 victims and 15 defendants.

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

One person was convicted of two offences of trafficking in human beings, namely a 43-year-old male citizen of the Republic of Hungary. As in the other cases mentioned above, of prosecution of the criminal offence of trafficking in human beings, this case also involved exploitation of prostitution.

- 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 the Republic of Slovenia, there was one conviction for two criminal offences of trafficking in human beings under Article 113(2) of the Criminal Code and Article 20 of the Criminal Code. The case involved the exploitation of prostitution of two adult victims.

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

In the Republic of Slovenia, there have been no convictions for trafficking in human beings that resulted in the confiscation of illicit assets.

- Number of convictions of legal entities for THB.

In the Republic of Slovenia, no legal entity has been convicted of the criminal offence of trafficking in human beings.