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to the Council of Europe Convention
on Action against Trafficking in Human Beings

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Report submitted by the authorities of Greece on measures taken to comply with Committee of the Parties Recommendation CP/Rec(2023)02 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings

Second evaluation round

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Report on the measures taken to comply with Committee of the Parties Recommendation CP/Rec (2023)02 on the implementation the Council of Europe Convention on Action against Trafficking in Human Beings by Greece.

In response to the Committee of the Parties Recommendation to Greece, the following measures have been taken to address the issues for immediate action identified in GRETA's report:

- *Intensify efforts to prevent THB for the purpose of labour exploitation, taking into account GRETA's Guidance Note on combating trafficking for labour exploitation and the Council of Europe Committee of Ministers Recommendation CM/Rec (2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation. This should include steps to:*

- *increase the number and strengthen the capacity of labour inspectors so that they can be actively engaged in the prevention of THB and ensure that their mandate includes a concrete focus on detecting potential victims of trafficking for labour exploitation;*
- *address the risks of THB in the agricultural sector and ensure that sufficient resources are made available to labour inspectors to fulfil their mandate and carry out proactive and systematic inspections, including in remote locations at risk of trafficking. When joint inspections are conducted, the role of the immigration authorities should be clearly defined and the relevant legislative framework should be further developed to ensure that undocumented workers are able to regularise their status;*
- *with a view to preventing abuse and exploitation, ensure that the living and working conditions of migrant workers meet all the requirements laid down in legislation, and provide adequate information on rights and social insurance coverage to migrant workers;*
- *train labour inspectors throughout the country, as well as law enforcement officers, prosecutors and judges, on combating trafficking for the purpose of labour exploitation and the rights of victims;*
- *ensure that inspections can take place in private households where domestic workers are employed with a view to preventing abuse of domestic workers and detecting cases of human trafficking;*
- *strengthen the monitoring of recruitment and temporary work agencies and supply chains and review the legislative framework for any loopholes that may limit protection or preventive measures;*
- *raise awareness among the general public as well as, in a targeted manner, among migrant workers, about the risks of trafficking for the purpose of labour exploitation;*
- *work closely with trade unions, civil society and the private sector to raise awareness of trafficking for the purpose of labour exploitation, prevent trafficking in supply chains and strengthen corporate social responsibility, drawing on the Guiding Principles on Business and Human Rights and Recommendation CM/Rec(2016)3 on human rights and business;*

The Hellenic Labour Inspectorate, as an Independent Authority, is strengthening its ties with the Police, the Office of the National Rapporteur, the National Referral Mechanism for the Protection of Victims of Human Trafficking, and the social partners with a series of actions intended to: a) provide labour inspectors with the necessary training; b) conduct targeted controls on demographic groups and economic sectors that are susceptible to labour exploitation (agriculture, construction, tourism, and food), while concurrently cooperating with other governmental agencies.

At national level, the Labour Inspectorate multiplied its efforts in the fight against human trafficking with a series of national action plans and institutional interventions aimed at more effective cooperation with law enforcement authorities (Hellenic Police) and civil society (NGOs). In the context of more effective cooperation with civil society and the more effective fight against trafficking in human beings, Labour Inspectorate proceeded to the signing of a memorandum of cooperation with a civil non-profit organization (A21 INGO) that operates exclusively in the fight against human trafficking. The aim of the Memorandum of

Cooperation is the closer cooperation of the Labour Inspectorate with experienced partners on the issue of trafficking in human beings.

At institutional level, the consolidation of this cooperation aims at developing channels of communication with citizens who tend to consider non-governmental organizations more accessible to report labour exploitation and provide first aid. The MoU refers to a series of joint actions to raise public awareness and improve labour inspectors' capacity to identify potential victims of trafficking. The main axis of the Memorandum of Cooperation is the organization of educational workshops and the promotion of awareness and information campaigns.

Within the framework of this MoU with A21 INGO "Abolish slavery in the 21st century", a total of four (4) training workshops were implemented in three (3) central cities: Two (2) workshops in Athens (May, June), one (1) in Thessaloniki (October) and one (1) in Heraklion (May). The trainings aimed to familiarize trainees with the institutional framework of trafficking in human beings, the presentation of indicators of labour exploitation that labour inspectors may encounter in the performance of their work, as well as the presentation of real cases of human trafficking that have been solved by the police. The seminars were attended as trainers by representatives from A21, the Labour Inspectorate, the Hellenic Police and the Public Prosecutor's Office.

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

Furthermore, the NRM team in EKKA has been coordinating intersectoral meetings/info-sessions on human trafficking and the NRM operation, targeting field professionals across the country. In 2023, such meetings were organised in Western Macedonia region (Florina, Kastoria, Kozani), Thessaloniki and Syros Island, with the participation of national-authority staff including the Hellenic Labour Inspectorate.

In February 2023, the NRM team in EKKA delivered a training on Indicators of and Prevention from Labour Exploitation targeting refugees residing in designated accommodation facilities, in the context of an educational programme entitled “Educating and informing beneficiaries of international protection and third country nationals legally residing in Greece on preventing and responding to human trafficking”, organised by the Ministry of Migration and Asylum (Directorate of Social Integration); the training curriculum focused on national labour law, tips on identifying possible signs of labour exploitation, and the existing protection framework.

The Public Security Directorate of the Hellenic Police Headquarters, is conducting in-depth analyses of human trafficking cases with the goal of enhancing understanding about how individuals are recruited and trafficked for exploitation. This includes examining various forms of exploitation, the methods used, the nationalities of both victims and perpetrators, and the ways in which these crimes are carried out.

Based on these insights, specific training programmes are being developed. Additionally, targeted directives are being issued to frontline service personnel who are most likely to encounter potential victims, with the aim of improving their ability to manage cases related to human trafficking for exploitation.

It's important to mention that the topic "Trafficking in Human Beings" appears in the syllabus and is covered in the training of students at both the foundational and advanced levels of the Hellenic Police Academy. Furthermore, from 2023 to the present, personnel within the Hellenic Police have engaged in a variety of training sessions, both domestically and internationally, focusing on human trafficking.

Similarly, judicial officers are trained in dealing with victims of trafficking through specialised seminars at the National School of Judiciary. Some of these trainings are provided on a one-off basis, others on a systematic and regular basis.

Given that the agricultural sector is a high-risk sector for labour exploitation and trafficking in human beings, the Labour Inspectorate has drawn up a special operational action plan for the control of enterprises exclusively active in agricultural production, fisheries/aquaculture and forestry. The operational action plan was drawn up and implemented in the context of the Joint Days of Action (EMPACT DAYS) of the European Multidisciplinary Platform against Criminal Threats (EMPACT). The aim of the business plan was to inform agricultural workers about their rights, to activate Labour Inspectors with targeted controls, to improve control methodology in the agricultural sector (Modi Operandi) as well as to experience sharing and good practices with the European Labour Authority (ELA), the Hellenic Police and the National Referral Mechanism (NRM).

The Hellenic Police Corps' Political and Physical Leadership places a high value on the battle against human trafficking and recruitment for the purpose of exploitation in all its manifestations. For this purpose, specialized services have been developed and are in operation. On the other hand, front-line police officers' knowledge of the identification of indicators of cases of human trafficking is updated by targeted instructions and training.

The 'Joint Action Days' in the framework of 'EMPACT THB/Labour Exploitation,' serve as an indicative example of how to combat human trafficking for the purpose of labor exploitation. The joint EMPACT DAYS of police and labour inspectors were held one week in June and one week in September 2022 and 2023, respectively, and the latest took place from 20 to 27 April 2024 (see the attached data). The aim was to dismantle criminal networks for the purpose of labor exploitation and to give a strong presence of labor inspectors and police officers in the local community, in order to give a strong social message of zero tolerance on the part of the authorities on issues of labor exploitation.

In the context of the joint audits of labor inspectors and police officers 2022-2023, in the agricultural sector, a total of 756 businesses/farms were inspected, where 303 violations of labor law were found. Financial fines amounting to €482,700 were imposed. In ten (10) cases, the findings of the audits were submitted to the prosecuting authorities for further investigation (see the attached data).

In the context of the Joint Days of Action against trafficking in human beings (EMPACT), questions were submitted to the Prosecutor's Office of the Supreme Court on key issues of competence of the Labour Inspectorate, including issues of cooperation with the police and prosecutors. In response to these, the Prosecutor's Office of the Supreme Court sent an opinion no. 3726, 4303/12-06-2023 to all co-competent authorities (Labour Inspectorate, ONR/Ministry of Foreign Affairs, Ministry of Justice, Chief of the Hellenic Police). The questions raised and answered extensively by the Prosecutor's Office of the Supreme Court concerned appropriate actions for the effective cooperation of the Labour Inspectorate with the police and prosecutorial authorities, the correct preparation of the control report of the labour inspectors and the correct report to the prosecuting authorities, as well as issues related to sensitive personal data. The aforementioned opinion was sent to all services of the Labour Relations Inspectorate.

A concise practical guide to identifying and reporting potential victims of labour exploitation has been developed centrally. The design of the guide was based on the guidelines of the International Labour Organization (DELPHI-ILO) and is a reliable guide for dealing with possible cases of human trafficking that labour inspectors can use appropriately to identify and effectively report potential victims. The practical guide was sent to all Labour Relations Inspection Departments and is the main guide for handling cases of human trafficking by labour inspectors.

In 2023, Labour Inspectorate staff have contributed to the detection and reporting of victims of labour exploitation to the Hellenic National Referral Mechanism for the protection of victims of human trafficking (NRM), following relevant complaints and/or inspections mostly in the agricultural sector.

As regards our national legal framework it has recently been further strengthened with the tightening of penalties and the specific provision on pimping of minors.

More specifically:

1.Human trafficking (Article 323A of the Criminal Code)

With the amendment of Article 323A (Article 69 of Law 4855/2021), the framework of penalties for all forms of commission of the offence has been redefined. Thus, in its simple form, it is now punishable by imprisonment (from 5 to 15 years), whereas before the amendment it was punishable by imprisonment for up to ten years (from 5 to 10 years).

Moreover, trafficking in human beings in its aggravated form, i.e. when (a) it is carried out on a professional basis; (b) it is carried out by a public official who, in the exercise of his or her functions or taking advantage of his or her position, commits or participates in the act in any way; or (c) it is linked to the illegal entry, stay or

exit of the victim; or (d) it results in serious bodily injury to the victim, shall be punishable by imprisonment for a term of not less than 10 years (from 10 years to 15 years) and a fine, and if it results in death, by life imprisonment.

Until 12-11-2021, the offence of human trafficking in its aggravated form was punishable by imprisonment (from 5-15 years) and a fine, while if it resulted in death it was punishable by imprisonment for at least ten years (from 10-15 years).

2.Pimping (Article 349 of the Criminal Code)

In addition to human trafficking, Law 4855/2021, with its article 121, sought to remedy the omission of the previous amendment to the Penal Code on the offence of pimping in article 349, which had abolished the pimping of adult women. Now pimping has been reinstated as an offence not only against adult women, but against adults in general, and thus anyone who, professionally or for profit, promotes, induces or coerces another person into prostitution, or exploits the proceeds of the prostitution of another person, shall be punished by imprisonment for a minimum of eighteen (18) months and a fine.

3.Conditional Release

Formal and substantive prerequisites were tightened for the conditional release of individuals found guilty of crimes under the Narcotics Act (in an aggravating manner), criminal organization, terrorist acts, high treason, murder, robbery, arson, arson in forests, extortion, minor rape, human trafficking, minor abduction, and all other crimes against sexual freedom.

In particular, in the case of temporary imprisonment for the above-mentioned offences, the possibility of conditional release is only given if 4/5 of the sentence has been calculated with a favourable calculation instead of 3/5, as was the case until November 2021. Therefore, for the above-mentioned offences, even with a favourable calculation of the sentence, the prisoner will spend more time in prison. In addition, for the above-mentioned offences, an actual stay in a penitentiary institution will be required, corresponding to 3/5 of the sentence (actual serving of the sentence) instead of 2/5 as it was until the change with Law 4855/2021.

In the case of life imprisonment for the above offences, the minimum effective sentence for convicted persons is increased from 16 to 18 years (effective sentence).

Finally, the release of a prisoner under the condition of electronic surveillance for the above offences was abolished.

Regarding of the awareness campaigns among the general public, labour inspectors in 2022, during the joint action days with the police (EMPACT DAYS), distributed printed information material to vulnerable groups for labour exploitation (migrants, war survivors). The leaflets translated and handed out to workers in the agricultural, handicraft, construction, tourism and food industries were in the five (5) languages Albanian, Pakistani, Ukrainian and Bengali (Bangladesh). In 2023, also, within the framework of the operational action plan of the Labour Inspectorate for the agricultural sector, a new improved informative leaflet was distributed with indications of human trafficking and the 24-hour telephone line 1109 of A21. Three thousand (3,000) leaflets were distributed to the local departments of the Inspectorate throughout Greece in June and September 2023. The leaflets are translated into 11 languages ((English, Greek, Albanian, Bulgarian,

Romanian, Russian, French, Farsi, Dari, Arabic and Bengali). The translation of languages was based on observation of increased labour exploitation in these populations. The printed informative material focused on agricultural workers as well as in sectors with a lack of access to information due to the nature of the work (isolated farmland).

On the occasion of the European Day Against Trafficking in Human Beings, an excerpt of the film "City of Ghosts" was posted on social media (facebook, twitter) and on the official website of the Labour Inspectorate. The film is about forced labour in the agricultural sector and is produced by A21 "Abolish slavery in the 21st century". The power of an artistic work has a multiplier effect and is considered a reliable mean of informing the audience about the real situation that takes place in cases of labor exploitation. The first social media post took place on the occasion of the European Day Against Trafficking in Human Beings in 18th of October 2023. Since then, it has been consistently maintained on the official central website of the Labour Inspectorate (https://www.hli.gov.gr/). Additionally, in order for the Labour Inspectorate to respond more effectively to modern technological requirements where online information is becoming the most direct and accessible source of information for citizens, the Labour Inspectorate has added a separate section entitled "Human Trafficking" to its official website. The section "Trafficking in Human Beings" is accessible in Greek, English, Urdu, Romanian, Bulgarian, Arabic and Ukrainian (https://www.hli.gov.gr/ergasiakes-scheseis/nomothesia-ergasiakes-scheseis/prostasia/emporia-anthropon/emporia-anthropon/). The choice of languages was based on the frequency with which the phenomenon of labour exploitation occurs in foreign populations.

The Labour Inspectorate participated also in the development of a handbook for migrant workers at increased risk of labour exploitation during a workshop that was conducted by the European Union Agency for Fundamental Rights (FRA) (July, September 2023) with the participation of expert labour inspectors from EU countries and the European Labour Authority (ELA).

In this vein, the Labour Inspectorate with Law 4052/12 incorporated into its national framework EU Directive 2009/52/EC on the imposition of sanctions and measures against employers of illegally staying third-country nationals. According to no. 83 of Law 4052/12 entitled "facilitation of complaints" "the provision of assistance to third country nationals in filing a complaint shall in no way be considered as assisting the illegally employed person in illegal entry, transit and residence". On the contrary, labour inspectors must make it easier for illegally employed foreigners to assert their rights, as expressly stated in Article 86, "illegally employed third-country nationals, by way of derogation from paragraph 1 of article 84 of Law 3386/2005 (A' 212), may appeal to the competent authorities to claim what is due and generally claim their legal rights in accordance with the applicable labor law, even if they have returned or have been obliged to return to their country".

The General Secretariat for Vulnerable Persons and Institutional Protection was established at the Ministry of Migration and Asylum under Article 6 of Presidential Decree 77/27.06.2023 (A' 130), with the aim of designing and shaping an effective protective framework for the vulnerable groups within the country's refugee and migrant population. Within this framework, the General Secretariat, aiming to ensure the vulnerable population's access to exercising their rights, whether these derive from their legal status or their condition, such as being victims of human trafficking, provides guidelines to the competent institutional bodies, undertakes initiatives, and offers expertise for shaping the relevant services of the Ministry of Migration and Asylum.

According to the L.5078/2023 – art. 187 – the regularisation of stay of migrants who prove that they have been in Greece for 3 years before November 2023 is foreseen. Bringing such a large number of invisible migrants with irregular stay in visibility mitigates their vulnerability to exploitation situations, as they will hold residence permits and will have access to labour and insurance rights. This provision is anticipated to benefit 28.000 migrants, eliminating among other things, their critical vulnerability stemming from the lack of legal documents. This vulnerability can be exploited by employers to keep migrants bound in an exploitative condition under the threat of deportation. In this sense, it constitutes an important preventive measure against labour exploitation.

The Ministry of Migration and Asylum has approved a detailed plan submitted by the GSVPIP to inform migrant workers about labour exploitation. This plan aims to ensure that the requirement for a valid employment contract, necessary for the issuance of a residence permit, is not used as a means to coerce them into work conditions that constitute the offense of human trafficking.

The minimum content of such information includes the definition of human trafficking according to the Penal Code, as well as the avenues for seeking help in case of being a victim of human trafficking. The detailed Plan is outlined as follows:

2.1 Activities for migrant workers

- Information campaign in close collaboration with the Independent Labor Inspection Authority, aimed to empower migrants with essential knowledge to identify signs of exploitation and deception in job offers. This initiative includes various approaches: distributing multilingual informational brochures, sending electronic messages to migrants applying for residence permits, developing a mobile application for self-identification and assessing potential exploitation in work conditions, conducting on-site outreach activities in high-concentration areas of third-country nationals like agricultural fields, and establishing information hubs at strategic locations.

2.2 Activities for Employers

The engagement of employers and their associations is crucial in preventing labour exploitation. They serve as key partners in enforcing labour laws, promoting corporate responsibility, and ensuring compliance. The proposed actions include developing corporate policies to eliminate exploitation risks in supply chains, implementing early detection protocols, launching awareness campaigns to foster responsible entrepreneurship and due diligence, and organising joint initiatives with major enterprises to showcase best practices. These efforts aim to create a robust framework for combating labour exploitation effectively.

2.3 Activities for the Public

- Campaigns to promote consumer awareness and consciousness, coupled with information on hotline numbers for reporting labour exploitation.

In the recent years, special care was taken by the Greek Authorities to address the risks of Human Trafficking in the context of the reception of people fleeing the war in Ukraine. The competent authorities have fully followed and implemented the recommendations of the Common (EU Commission - MS - EU Agencies) Anti-Trafficking Plan to address the risks of trafficking in human beings and support potential victims among those fleeing the war of in Ukraine.

In the context of the prevention and response to Combating Trafficking in Human Beings, in the light of the massive influx of refugees due to the Ukrainian crisis, the Office of National Rapporteur on Combating Trafficking in Human Beings (ONR/MFA), in cooperation with the Secretariat of the OSCE Special Representative and Coordinator for Combating Trafficking in Human Beings, co-organized a workshop on strengthening the prevention of trafficking in human beings (11.7.2023), which focused also on the support of the employment/integration of Ukrainian people seeking refuge in the labour market. Frontline experts from all national stakeholders and the Labour Inspectorate participated.

- *Ensure that individualised risk assessment is conducted prior to any forced removals and that it assesses the risks of trafficking or re-trafficking on return, in compliance with the obligation of non-refoulement. In this context, full consideration should be given to the UNHCR's Guidelines on the application of the Refugees Convention to trafficked persons and GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection;*

To address the issue of unauthorized immigration in Greece, the Hellenic Police has put into place a range of measures designed to identify and manage individuals who do not possess the required travel documents. Concurrently, in line with existing laws, specific directives have been issued to the relevant departments of the Hellenic Police, ensuring that the enforcement actions are conducted with full regard for the rights and respect of the individuals being inspected.

Notice that the aforementioned actions, along with all other police actions, are generally intended to protect public order and security and are demonstrated in accordance with objective criteria, regardless of nationalities, political or religious beliefs, racial criteria, discrimination, or other distinctive elements characterizing the persons being controlled and, where appropriate and only on the basis of individualised indications resulting from the behaviour.

The first reception tasks (registration, reception fingerprinting, fingerprinting, photographing, identification of citizenship, identification of vulnerability, etc.) for all foreign nationals are among the standard procedures followed at the operational level after the identification of migrants who have entered the Greek mainland without the required legal formalities.

As regards the measures taken to protect migrants and asylum seekers, victims of trafficking in human beings or persons covered by the category of vulnerable groups, it is noted that the existing legislation "on Foreigners" (Law 3386/2005, Law 3907/2011, Law 4375/2016, Law 4636/2019, as amended and in force with Law 4686/2020, as well as Law 4825/2021), it is the established practice of the Hellenic Police to take utmost care during the admission procedures for these target groups (issue of a 6-month deportation/return suspension with the prospect of renewal, information on their rights) and to cooperate with relevant Ministries and agencies in providing hosting in appropriate accommodation structures.

Additionally, foreigners who are victims of human trafficking are eligible to apply for a residence permit under the provisions of articles 49 (par. 1-3) and 50 of Law 4251/2014 (Migration Code and Social Integration). This also applies to foreigners who are victims of trafficking in migrants.

- *Take steps to improve the identification of victims of trafficking, and in particular:*

- *ensure that the identification of victims of trafficking does not depend on the presumed victim's complaint (statement) and co-operation in the investigation or criminal proceedings, by amending the relevant legislation. The expertise of relevant organisations and entities, such as specialised NGOs, psychologists, health-care staff and labour inspectors should be duly taken into account during the identification procedure;*
- *ensure that the process of granting the status of victim of trafficking is completed without undue delay;*
- *pursue a proactive approach to the identification of victims of trafficking for the purpose of labour exploitation by encouraging regular and co-ordinated inspections in the sectors most at risk;*
- *ensure that qualified interpreters are available whenever presumed victims of trafficking are interviewed in the context of the victim identification procedure. The costs of interpretation should be covered by the authorities;*

The Hellenic National Referral Mechanism for the Protection of Victims of Human Trafficking (NRM), in its fifth year of operation, since its 2019 rollout, administered by the National Centre for Social Solidarity (EKKA) and supervised/coordinated by the Office of National Rapporteur on Human Trafficking (ONR/MFA), has expanded its impact through significant developments, as follows:

-Gradual and steady increase in the number of cases reported to the NRM since its launching.

-Publication of five (5) annual reports, to date, presenting reliable data on victims' history of human trafficking (i.e. recruitment phase, transfer/transportation, reception and/or harbouring, exploitation phase and the specific circumstances, inter alia), as well as victims' current situation, including demographic data, information on protection services being or having been provided and on participation in criminal proceedings, which is required for the holistic assessment of each victim's vulnerability and the detection of additional needs (available here: https://ekka.org.gr/index.php/en/ethnikos-mixanismos-anaforas-en).

-Continuous update of the NRM SOPs to be applied on a national level including all necessary steps in the process of detection, identification and protection of victims (available here: https://ekka.org.gr/index.php/en/ethnikos-mixanismos-anaforas-en).

Specialised SOPs have been published for Health Care Units of the National Health System, as well as for the Reception and Identification Centres and other Accommodation Facilities for asylum seekers of the Ministry of Migration and Asylum, tailored to their internal circumstances and specific needs, with the participation of those Agencies' representatives in the drafting procedure.

-Continuous update of the NRM tools, including the NRM Reporting Form, NRM Handbook and the Practical Guide for Frontline Professionals - Detection and Protection of Human Trafficking Victims (available here: https://ekka.org.gr/index.php/en/ethnikos-mixanismos-anaforas-en).

-Continuous support to front-line professionals provided by the NRM team of experts in EKKA; it entails day-to-day contact, provision of guidelines on all protection stages for reported cases and information dissemination with constant updates on the NRM operation and services available for victims.

-Provision of trainings targeting both national-authority and NGO staff and development of information material.

To date, 57 Civil Society organisations have joined the Hellenic NRM, along numerous state agencies that might detect, identify and/or provide protection services to a (presumed) human trafficking victim in their everyday practice. A list of all NRM participating actors is available in English here: https://ekka.org.gr/index.php/en/ethnikos-mixanismos-anaforas-en

Human trafficking victims are granted status as such by the issuance of an order by the Public Prosecutor, as provided for by law (Article 4, para. 1, ia, Law No 5038/2023). The said order is issued after the initiation of prosecution, or before that following the submission of a written opinion before the Public Prosecutor as a prerequisite. In other words, victims can be granted status either by reporting the offence before the competent Authority or, in case they do not wish to proceed with it, by the submission of the said opinion, in the context of the so-called social path alternative; the latter entails the participation of two social protection professionals working with such victims who will provide an opinion, in the form of a psychosocial report, to support the victim's case before the Public Prosecutor. In light of the above, the initiation of criminal proceedings is not a condition to one's declaration as a human trafficking victim.

Therefore, the role of NGOs in the handling and management of human trafficking cases is important, as they are often the first to come into contact with victims, where they provide care, guidance and advice to the victims to go to the competent authorities in order to follow the legal procedure. Their contribution to the legal procedure to be followed in these cases is therefore vital.

On May 23, 2022, the Deputy Public Prosecutor of the Supreme Court of the Hellenic Republic, issued a circular on the procedure of granting human trafficking victim status (available here: **Deputy Public Prosecutor of the Supreme Court of the Hellenic Republic. 2022. Official recognition of victims of trafficking in human beings. Circular No 7. Athens: Supreme Court of the Hellenic Republic**)(Please see attached a copy officially translated in English).

The circular intended to provide guidelines for the competent Authority, ultimately aiming at a uniform procedure complying with EU legislation on human trafficking. To this end, and in accordance with the objectives, the Deputy Public Prosecutor has:

a. Suggested that merely indication(s) of one being a human trafficking victim should be sufficient for the competent Authority to issue the said order, according to article 4 par. 1 (ia) of Law No 5038/2023.

b. Reaffirmed that the said order can be issued regardless of the initiation of prosecution or the victim's willingness to report the offence and cooperate with the Hellenic Police.

c. Suggested that the said order should be issued with an indefinite validity period (however, with the possibility of revocation in case there is evidence proving one not to be a human trafficking victim), thus advising against possible future practices of the competent Prosecution Authorities issuing relevant order with a limited validity period.

d. Suggested that a 3-month reflection period, as provided for in article 135 of Law No 5038/2023, should be granted to victims, without prior relevant request, and regardless of the issuance of the said order, which should not be a prerequisite.

A psychologist or psychiatrist is present during the examination of presumed victims of human trafficking. They work with the investigators to prepare the victim for the examination, using suitable methods to assess their mental state. The priority is to prevent any further harm to the victim during this process.

For the purpose of a holistic investigation of the cases concerned, the competent authorities shall not rely solely on the testimony of the alleged victim. The cooperation of the alleged victim is desirable, without being imposed, because there is a risk of re-victimisation. In any case, the investigation of the relevant case continues with the use of special investigative techniques, on the basis of the Code of Criminal Procedure.

The Office of the National Rapporteur on Trafficking in Human Beings (ONR/MFA) and NRM/EKKA of the Ministry of Social Cohesion and Family, in cooperation with OSCE Office of the Special Representative and Coordinator for Combating Trafficking in Human Beings (OSR/CTHB), co-organized a workshop on "Unconditional access to services for victims of trafficking in human beings" (Social Path Workshop) in Athens, (14-15/2/2024) with representatives of state/governmental agencies, NGOs and IO's. The workshop served as a participatory expert platform to enhance the participants' understanding of the rationale behind the so-called "social path" alternative to victim identification and assistance that is detached from victims' co-operation with the criminal justice system, as well as the benefits it brings to victims themselves. A considerable part of the discussion centred around the steps and measures required for a more effective implementation of the "social path" alternative in the national context. Following this workshop, there is an ongoing collaboration with OSCE on further steps to be taken towards the enhancement of its application across the country, including the coordination of a working group at a central/or regional level with the aim to develop operational protocols and tools.

Since 2022 the Department of Mobile Populations of the National Public Health Organization (EODY) developed the Gender Based Violence Incident Management Protocol for the management of Gender Based Violence in the migrant/refugee environment.

This protocol refers - and not only - to the international, European and international texts that deal with gender-based violence, so that health professionals and beyond are aware of the legal instruments that exist for this phenomenon. The second part is a detailed description of the work of each professional (doctor, midwife, nurse, social worker, psychologist) when confronted with a potential victim of gender-based violence. In other words, it lists the signs that may indicate possible gender-based violence and then describes how to deal with them so that the potential victim can receive the necessary care and help.

This protocol works as a tool for the professionals at the migration and refugee sector and the purpose is to empower professionals in the field to identify, prevent and address the phenomenon of gender-based violence - in cooperation with all other actors involved - of which human trafficking is a part of it.

In this context, a six-month training has been given to the field Professionals about extensive reference to human trafficking. The crime is hidden, and usually people don't know that is a crime according to law. The professionals in all Camps and Reception & Identification Centers (islands and on the mainland), send immediately all the reported cases of human trafficking to the National Referral Mechanism (NRM). All the professionals are in constant communication with the National authorities involved in this fight against the crime of Trafficking, such as ONR/MFA, NRM/EKKA, Ministry of Migration, Hellenic Police etc.

Accessibility and continuous information and training are the keys to identifying and managing incidents of human trafficking, and takes a dual character, both in terms of easy access to services and in terms of the skills of each professional, man or woman. For these reasons information has to be continuous as the training.

In order to further facilitate the collaboration between professionals and interpreters who working in the migrant/ refugee field, the Department of Mobile Populations is developing a "Guide to assigning terms/definitions in the migrant refugee environment".

The Reception and Identification Service (RIS) of the Ministry of Migration and Asylum, issued a Standard Operation Procedure on the identification and response to potential or actual victims of human trafficking within the reception and accommodation facilities. The procedure provides guidelines to the field staff with regards to the steps that need to be followed so as to better support a victim - potential or actual - of human trafficking. The procedure includes guidelines for minor victims of human trafficking as well.

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

RIS in coordination with the International Organization for Migration distributed awareness and prevention material in the form of posters to all the reception and accommodation facilities. The thematic of the posters was covering Gender Based Violence and Trafficking in Human Beings. The posters were translated into 8 languages.

Moreover, RIS in cooperation with agencies, international organizations and non-governmental organizations delivered several trainings related to trafficking in human beings, but also related to Gender-Based Violence, Child Protection and vulnerabilities in general. To be noted that all the below mentioned trainings, despite the fact that some of them are not tailor made on Trafficking, contain information on how to identify indicators and provide support to the possible and actual victims of human trafficking.

More specific in 2022 the following related trainings took place:

- 236 staff members of RIS, NGOs, the National Public Health Organization participated in a training covering “Trafficking in Human Beings”, organized by RIS and the civil society organization KMOP.
- 89 staff members of RIS participated in the “Reception of Vulnerable Persons – Block A” training that was organized by RIS and the European Union Agency for Asylum.

While in 2023 the following related trainings took place:

o 112 staff members of RIS participated in the presentation of the “GBV- pocket guide”, an application on how to support survivors of gender-based violence organized by RIS and the General Secretariat for Equality and Human Rights.

o 102 staff members of RIS and the National Public Health Organization participated in the “Reception of Vulnerable Persons – Block A” training that was organized by RIS and the European Union Agency for Asylum.

o 60 staff members of RIS and the National Public Health Organization participated in the “Reception of Vulnerable Persons – Block B” training that was organized by RIS and the European Union Agency for Asylum.

o 92 staff members of RIS and the National Public Health Organization participated in a training covering the “Child Friendly Spaces”, organized by RIS, Solidarity Now NGO and UNICEF.

o 33 staff members of RIS participated in a “Train the Trainer training on Gender Based Violence”, organized by RIS and the International Organization for Migration.

o 67 staff members of RIS and the National Public Health Organization participated in trainings on “Gender Based Violence”, organized by RIS and the International Organization for Migration.

o 21 staff members of RIS participated in a “Train the Trainer training on Child Protection”, organized by RIS and the International Organization for Migration.

o 109 staff members of RIS and the National Public Health Organization participated in trainings on “Child Protection”, organized by RIS and the International Organization for Migration.

o 34 staff members of RIS and the National Public Health Organization participated in a training covering the “Female Friendly Spaces”, organized by RIS, Solidarity Now NGO and UNICEF.

o 27 staff members of RIS participated in a “Train the Trainer training on Trafficking in Human Beings”, organized by RIS and the International Organization for Migration.

o 43 staff members of RIS participated in the training covering “Trafficking in Human Beings” that was organized by RIS and the European Union Agency for Asylum.

With regards to the implementation of future related to the subject trainings, so far RIS has planned for 2024 to carry out the following related trainings:

o “Trafficking in Human Beings”, organized by RIS and the European Union Agency for Asylum

o “Children in the asylum process”, organized by RIS and the European Union Agency for Asylum

o “Victims of Gender-Based Violence”, organized by RIS and the European Union Agency for Asylum

o “Reception of Vulnerable Persons – Block A”, organized by RIS and the European Union Agency for Asylum

o “Reception of Vulnerable Persons – Block B”, organized by RIS and the European Union Agency for Asylum

For ensuring that the process of granting the status of victim of trafficking is completed without undue delay we have to mention that as soon as a preliminary police investigation (under the Code of Criminal Procedure) establishes that a person is a victim of human trafficking, the competent prosecutor is notified to provide the formal identification of that person.

Moreover, in the event that interpretation is required at the preliminary stage of police questioning, it shall be provided in accordance with the provisions of the Code of Criminal Procedure.

In this context, the Ministry of Migration and Asylum, as of 2023, signed an agreement with METAdrasi NGO on the provision of interpretation. The interpretation services are provided to the asylum seekers and refugees residing in the registration and accommodation facilities of RIS and are free of charge and cover all aspects within the reception system, including the identification of the potential and actual victims of human trafficking.

The Hellenic Diplomatic Academy of the Ministry of Foreign Affairs pursuant to the suggestion of the Office of National Rapporteur (ONR) has included in the curriculum of the education of new promotion of diplomats special training (lectures and simulations) about the issue of THB. Specifically, among other, the specialized programme focus on training young diplomats how to identify potential victims of trafficking when exercising Consular duties - visas applications etc. Furthermore, the Diplomatic Academy, every year, organizes 3-4 seminars for all the staff of the Ministry of Foreign Affairs, including diplomats, on consular issues where the issue of combatting THB, especially in women and girls, is one of the main subjects.

A training program has taken place at MFA (20-21/3/2024), in cooperation with UNODC, addressing to the competent personnel working in our consular and diplomatic missions. UNODC/HTMSS in collaboration with the Office of the National Rapporteur on Human Trafficking, the Hellenic Diplomatic Academy, NRM/EKKA are currently reviewing a curriculum on human trafficking for the Hellenic Diplomatic Academy, developed by UNODC.

- *Take further steps to improve the identification of, and assistance to, child victims of trafficking, in particular by:*

- *ensuring that relevant actors take a proactive approach and increase their outreach work to identify child victims of trafficking and refer them to the NRM, by paying particular attention to unaccompanied and separated children and children from Roma communities;*
- *ensuring long-term assistance for the integration of child victims of trafficking;*

In all Hellenic Police services at the frontline, which are at high risk of encountering victims of human trafficking, especially minors, there is a continual effort to maintain the latest knowledge and heightened awareness through targeted training and seminars. This is done with the intention of improving the capacity to identify child victims of human trafficking and to provide appropriate assistance and protection.

The National Center for Social Solidarity (EKKA) operates the National Child Protection Helpline “1107”, a 24/7 helpline for children in need, including human trafficking victims; in the context of an EEA-grants funded project (2014-2021), the helpline has been staffed with social workers, psychologists and interpreters (Arabic, Farsi, Urdu). The project, launched in February 2022 and operated until April 2024, intended to:

a. increases the team’s capacity to respond to requests for assistance or support from unaccompanied/separated minors who are at risk,

b. facilitates communication and access to information for unaccompanied/separated minors,

c. ensures their well-being,

d. promotes inclusion and non-discrimination, and

e. promotes and maintain cooperation with the General Secretariat for Vulnerable Persons & Institutional Protection.

The main driver has been the need for responding to the multifaceted and often urgent needs of unaccompanied/separated minors. For more information, please refer here: https://www.ekka.org.gr/index.php/en/tilefonikes-grammes-2

On a regular basis the NRM team in EKKA has been facilitating capacity building activities, in the form of training sessions, targeting national-authority and (I)NGO staff, both in urban centres and in various regions across the country. In 2023, the NRM team has organised and delivered training activities, both in-person and online, targeting both national-authorities, the Hellenic Asylum Service (GAS) and the Hellenic Reception and Identification Service (RIS), and (I)NGO staff, including organisations working with children, for the purpose of building capacity for front-line professionals to detect and protect human trafficking victims in line with the NRM SOPs and the existing legal framework. In this context, staff working directly with mostly unaccompanied and separated children (UASC), e.g., GAS case workers, RIS accommodation facility staff, UASC accommodation facility staff, including NGO child protection specialists, i.e., social workers, psychologists and legal practitioners, have been trained.

✓ Tackling homelessness of Unaccompanied Children

The General Secretariat of Vulnerable People and Institutional Protection of the Ministry of Migration and Asylum, particularly its Accommodation and Relocation Requests Management Unit, oversees the placement of unaccompanied minors in suitable long-term accomodation facilities. These facilities include Unaccompanied Minors' Accommodation Centres or Supervised Apartments for Semi-Independent Living for minors over 16. The unit manages housing requests, transfers minors from temporary to long-term facilities, and provides necessary support services.

In 2023, the Unit handled approximately 4,600 housing requests and managed vulnerable cases, collaborating with child protection agencies and authorities. It facilitated transfers of minors to safe accommodations on the mainland and throughout the country, with trained escorts and interpreters provided by NGO METAdrasi.

The Unit conducts study visits to Controlled Access Centres on islands to observe procedures and conditions firsthand. It initiates meetings with operating entities of accommodation facilities to enhance cooperation and has conducted mapping of agencies managing incidents of delinquent behaviour.

Funded by the Greece-Asylum, Migration, and Integration Fund (AMIF) 2021-2027, the project covers 1,750 accommodation places in centres for unaccompanied minors. Additionally, the project for Supervised Apartments for Semi-Independent Living, initially funded under the National Programme of the AMIF 2014-2020, is now included in the AMIF 2021-2027 programme.

Given that homelessness is a high-risk factor additional to unaccompanied children’s minority, it is self-evident how crucial this activity is for the prevention of children’s exploitation and abuse of any kind.

✓ National Emergency Response Mechanism (NERM) for Unaccompanied Children's Protection

The National Emergency Response Mechanism (NERM), established in 2021 by the General Secretariat for Vulnerable Persons and Institutional Protection, addresses the immediate needs of unaccompanied children facing homelessness or precarious conditions. Developed in collaboration with the United Nations High Commissioner for Refugees, NERM operates since 2021 through a Tracing Line, directing cases to emergency accommodation facilities for swift and safe accommodation, serving as a model for child protection. The emergency mechanism stands as a preventive measure against trafficking by offering protection unaccompanied children who have entered Greece irregularly and most of them remain unregistered, not being able to access any services. It is a mechanism that aims at the timely identification of children in need or at risk, including child victims of trafficking, and that ensures immediate intervention and protection.

NERM's scope expands with the General Secretariat's broader mandate, aiming to include interventions for other vulnerable adults and liaison with reception authorities, hospitals, and social services. Civil society organizations, like the "Network for Children's Rights" in Attica and "Arsis" in Thessaloniki, support NERM through Info Desks and Mobile Units, offering legal and psychosocial assistance to unaccompanied children and facilitating their inclusion in the accommodation system.

Mobile Units escort children to police departments for registration, health facilities for examinations, and emergency accommodation facilities for placement. Since its establishment in 2021, until 18/04/2024 NERM has accommodated 4987 unaccompanied children, with 1,356 accommodated in 2023. Currently, four Emergency Accommodation Facilities for Unaccompanied Children, managed by the International Organization for Migration, offer specialised services including education and healthcare, while assessing individual needs and conducting best interest assessments to determine suitable long-term accommodation.

NERM has initiated targeted efforts, notably the "Protection for All Minors" program, led by the "Network for Children's Rights" and funded by INTERSOS since October 2022 in Athens. This program focuses on individualised interventions for unaccompanied and separated minors living in precarious conditions. Specifically, in the Urban Safe Space reception area, specialised services aim to persuade minors reluctant to join formal accommodation to transition to safer environments.

Key to this programme is the "Assistants," social workers and psychologists, who develop personalised action plans for each child and maintain a physical presence at Regional Asylum Offices in Attica to promptly assist any minors arriving there. Initially implemented only in Attica, there are discussions about extending the program to Northern Greece.

Additionally, within NERM's framework, "METADRASIS" provides a tele-interpretation line operating Monday to Saturday from 06.00 to 22.00 in various languages, enhancing communication accessibility.

NERM's Info Desks, operating in Athens by the Network for Children's Rights and in Thessaloniki by Arsis, provide services and information to unaccompanied children, who are homeless or living in precarious conditions with the purpose of securing access to GSVPIP's protection network. In this regard, Info Desks,

provide information to unaccompanied children, who might be at risk of human trafficking and play a preventive role in their victimisation.

Greece's commitment to NERM's enhancement and continuity was showcased at the World Refugee Forum organized by UNHCR, where NERM's operations were highlighted as a best practice in child protection on December 14, 2023. In November 2023, NERM was awarded the second place for its contribution at the European Crime Prevention Award and Best Practice Conference, a contest that rewards the best European crime-prevention projects.

Moreover, the Ministry of Migration and Asylum, as of October 2021, provides cash assistance to adult applicants of international protection and their family members, including the separated children whose temporary custody has been assigned to an adult guardian, and are accommodated in the Greek reception facilities, namely: Reception and Identification Centers (RIC), Closed Controlled Access Centers (CCAC) and the Controlled Access Facilities for the Temporary Accommodation of Asylum Seekers (CAFTAAS). The provision of cash assistance varies according to the family size of the family.

Raising awareness for human trafficking in the school environment of primary and secondary education, accompanied by the tightening and implementation of laws criminalising child marriage, forced labour, human trafficking, child pornography and all forms of bullying contribute to the reduction of violence against and among children, as well as the identification of possible child victims of trafficking.

In the prevention context, the Ministry of Education, Religious Affairs and Sports in cooperation with the Institute of Educational Policy (IEP) based on the recommendations of the Commission for the Support of Children of Refugees and Scientific Assistance, has launched and implemented a co-financed programme with the title “Training Interventions for the support of school structures of the educational system”- Action 4 “Training Actions for the support of the education of refugee children” this programme aimed at carrying out:

- the initial training of the Coordinators for refugee education and other education executives who were expected to support refugee education,
- the training of teachers who were to staff the Refugee Reception and Education Structures and/or Reception Classes,
- the development of supportive educational material

[http://iep.edu.gr/el/component/k2/content/50-ekpaidefsi-prosfygon]

The IEP’s Unit for Special and Inclusive Education has participated in the development of multilingual educational material for migrant and refugee children through initiatives such as: the "Accelerated Learning Programme". Deliverable of this synergy was a three-year teaching and learning material to support students with different cultural and language background and classroom or reception teachers in secondary schools. This material includes a curriculum, a digital repository, six teaching textbooks and the teachers’ guides, all in 10 different languages.

Moreover, IEP, Ministry of Education, Religious Affairs and Sports and UNICEF established an advisory body for cooperation entitled "All children in education-ACE". The “All Children in Education” initiative launched a

national programme in order to support all refugee and immigrant children to have access to quality learning. The “All Children in Education” programme has covered three school years, starting in September 2021, aiming not only to increase access to public schools, but also to provide the necessary post-enrollment support, to achieve better learning outcomes and integration into the Greek society.

IEP has also organized two (2) training sessions in order to support the work of teachers working in Reception Classes and Refugee Reception and Education Structures and their professional development, as well as to highlight the policies and practices of reception and inclusion of refugee students in the Greek educational system. The training sessions took place on Tuesday 19 and Thursday 28 March 2024.

A Memorandum of Cooperation has been signed between IEP and the Cyprus Pedagogical Institute of the Ministry of Education, Culture, Sports and Youth of Cyprus and an NGO based in Cyprus, Step Up Stop Slavery (Step Up), for the inclusion of an educational/pedagogical programme of Prevention against Human Trafficking at all levels of education entitled "Letters of Support" (with the no. 61/12-11-2021 Act of IEP). The educational programme consists of a series of teacher training workshops covering various topics and complemented by curricula to support implementation in class for children aged 8-18. An online platform will also be developed to host, among others, the programme material, lesson plans and guidelines to teachers.

IEP was the coordinator of the "Inclusive Schools for Roma" project, implemented with the co-financing of the European Programme “Rights, Equality and Citizenship” (Grant Agreement, number: 881953 - Inclusive Schools REC-AG-2019 / REC-RDIS-DISC-AG-2019), in collaboration with the Athens Lifelong Learning Institute, the NGO Antirropon, and the New Horizons Association of Greek Roma. The project duration was two years (01-06-2020 to 31-05-2022). The "Inclusive Schools for Roma" project developed and implemented an effective inclusion strategy for the successful integration of Roma students into school. This intervention was piloted for an entire school year in twenty (20) selected schools across Greece, involving approximately 200 teachers and 50 mediators. It includes the development of training guides and support materials for the educational community, which will be used to train the mediators and the participating schools in the pilot implementation.

Every year IEP approves the implementation of educational programmes by Social Partners, Non-Governmental Organizations (NGOs)/ Intergovernmental Organizations (e.g., UNHCR, UNICEF), Universities, Research Institutes and Centers, Private, National educational and scientific centers of local authorities in the country's schools. These programmes aim to inform, educate, train, raise awareness, and empower students, covering topics such as human rights, social inclusion and equal opportunities, prevention and handling of violence and aggression, combating all forms of discrimination, deconstructing gender stereotypes, and fostering democratic consciousness. For the school years 2022-2023 and 2023-2024, the educational programmess submitted by organizations and approved by IEP’s Scientific Units of "Educational Innovation" and "Special and Inclusive Education" concerning these thematic areas are as follows:

- "Protection and Safety of Students - Domestic Violence," by the Hellenic Police
- "Information and Awareness for Teachers and Students on Gender-Based Violence, Discrimination, and Gender Equality," by the "Research Center for Gender Equality"

- "Promotion of Gender Equality and Prevention of Gender Discrimination," by the organization "Doctors of the World".

Since February 2020 (pilot implementation) and September 2021 (in all types of schools), the Ministry of Education, Religious Affairs and Sports along with the Greek Institute of Educational Policy (IEP) have been implementing the innovation of “Skills Labs” in compulsory education as well as a relative teacher’s professional development programme. Skill Labs include issues relating to the environment, equality, equity, equal opportunity, social citizenship, professional orientation, sustainable growth etc. The aim of this initiative is to create a safe space where students and young people will have the opportunity to learn experientially and discuss issues of justice in pluralistic and intercultural democratic societies, along with other contemporary controversial issues such as gender equality, global citizenship and the rights of all persons to dignity and respect amongst others. Over 100.000 teachers of compulsory education (primary and secondary level schools) attended the training programme “Skills Labs” (11/03/2021 - 30/06/2023) and 74.000 teachers were awarded a certificate of completion. The educational material and activities for “Skills Labs” have been developed by Social Partners, Non-Governmental Organizations (NGOs) /Intergovernmental Organizations (High Commission for Refugee, UNICEF), Universities, Research Institutes & Centers, Private National Educational and Scientific Centers or Scientific Centers of Local Authorities. “Skills Labs” have received the Global Education Award 2020/ 2021.

- *Ensure that all possible foreign victims of trafficking, including EU and EEA citizens, are systematically informed of the possibility to be granted a recovery and reflection period and are granted such a period when there are grounds to believe they are victims of THB, regardless of whether or not they co-operate with law enforcement authorities. Training and written instructions on the purpose of the recovery and reflection period and the procedure for granting it should be provided to police officers, prosecutors, and other relevant officials;*

In all cases where there are grounds to believe that a case of human trafficking may have occurred, victims shall be informed, in a language they understand, of all their rights under the applicable legislation.

A reflection period for human trafficking victims, as provided for by law, refers to a definite period of time, after the completion of the procedure of granting victim status, so as for the victim to disconnect from perpetrator(s), recover, physically and/or mentally, and receive an informed decision on whether they will report the offence before the competent Authority (Article 135, Law No 5038/2023).

As mentioned above, Deputy Public Prosecutor of the Supreme Court of the Hellenic Republic, issued circular No 7 of 2022 on the procedure of granting human trafficking victim status, including guidelines on the application of law provision on granting a reflection and recovery period for victims. A major positive development was the Prosecutor’s encouragement towards granting the said period before the completion of the procedure of declaring victim status, contributing to strengthening protection for victims who have not been granted status yet and/or have not cooperated with the competent Authorities for various reasons, e.g., threats, fear of retaliation, unstable mental health, among others.

Please refer to: **Deputy Public Prosecutor of the Supreme Court of the Hellenic Republic. 2022. Official recognition of victims of trafficking in human beings. Circular No 7. Athens: Supreme Court of the Hellenic Republic.**

All EKKA training curricula on human trafficking, developed by the NRM team, have included information on the reflection period, as provided for by law.

- *Take further steps to guarantee access to compensation for victims of trafficking, in* particular by:

- *providing information to all victims of trafficking on their right to compensation and the ways to access it, in a language they can understand, and ensuring that victims have effective access to legal aid in this respect;*
- *ensuring that state compensation is effectively accessible to victims of trafficking;*
- *making full use of the existing legislation on the freezing and forfeiture of assets to secure compensation for victims of trafficking;*
- *including victim compensation into training programmes for law enforcement officials, prosecutors, judges and lawyers;*

By law. 3811/2009 established the Compensation Authority for Victims of Violence and Victims of Trafficking in Human Beings.

More specifically,

Article 1 of Law No. 3811/2009 establishes an authority called "Hellenic Authority for Compensation of Victims of Crime", which operates within the Ministry of Justice and decides on applications for compensation of victims of crimes, including trafficking in human beings.

Article 3 states that the decision on the application for compensation is taken by the Hellenic Compensation Authority.

Article 8 specifies the amount of compensation and the scope of coverage as follows:

Determination of the amount of compensation:

1.For the determination of the amount of compensation, the provisions of Greek law shall apply, subject to the more specific provisions of this Law.

2.The compensation covers medical expenses and hospital fees, specialised mental and psychological support for the victim when there is no public mental and psychological support structure in the victim's place of residence or stay, loss of income for a reasonable period of time, the costs of changing environment and residence, in particular the costs of moving and purchasing necessary consumer goods for relocation to a safe environment and funeral expenses. The amount of the compensation for mental and psychological support for the victim shall be determined by a joint decision of the Ministers of Justice, Transparency and Human Rights, Finance and Health, while the type of relocation costs covered and the amount thereof shall be determined by a joint decision of the Ministers of Justice, Transparency and Human Rights and Finance.

The relevant categories of professionals who come into contact with victims of human trafficking, depending on the organisation to which they belong and in which they work, are trained to deal effectively with such incidents. Each institution and organisation operate on the basis of its own statutes, therefore access to information and training is provided through training seminars where appropriate. For example, judicial officers are trained in dealing with victims of trafficking through specialised seminars at the National School of Judiciary, and the Hellenic Police officers through

systematic training at the Hellenic Police Academy, as mentioned above. In the context of the training courses for the staff of the competent services of the Hellenic Police, the subject of the rights of human trafficking victims is also analysed.

- *Strengthen the criminal justice response to trafficking, including by:*

- *ensuring that human trafficking offences are proactively and promptly investigated, regardless of whether a complaint about the reported crime has been submitted, and that relevant documentary, financial and digital evidence is collected during investigations, in order to avoid relying exclusively on testimony by victims or witnesses;*
- *ensuring that human trafficking offences are prosecuted as such every time the circumstances of a case allow this, rather than being requalified as lesser offences, and lead to effective, proportionate and dissuasive sanctions for those convicted;*
- *ensuring that units investigating human trafficking offences are properly resourced, are not reassigned to other offences due to competing demands, and make use in practice of special investigation techniques;*
- *systematically carrying out financial investigations in order to locate, seize and confiscate the assets of the perpetrators;*
- *strengthening efforts to investigate and prosecute cases of trafficking for the purpose of labour exploitation;*
- *ensuring that the length of court proceedings in cases of trafficking of human beings is reasonable, in line with the case-law of the European Court of Human Rights (related to Article 6, paragraph 1 of the ECHR) and the standards set by the European Commission for the Efficiency of Justice (CEPEJ);*

Crimes of trafficking in human beings are investigated regardless of whether the victim has previously filed a complaint. These cases are prosecuted ex officio.

For the effective investigation of human trafficking cases, the Hellenic Police has proceeded to the establishment of Anti-Trafficking Units and Teams. At the staff level, since September 2002, the Directorate of Public Security of the Hellenic Police Headquarters deals specifically with the issues of human trafficking and guides the regional operational services.

At the operational level, there are twelve (12) Anti-Trafficking Teams and two (2) Anti-Trafficking Units in the Organized Crime and Human Trafficking Sub-Directorates of the Attica and Thessaloniki Security Directorates, respectively, the members of which have received specialised training regarding the approach of (potential) victims and the investigation of human trafficking cases.

To ensure a holistic investigation of these cases, there is cooperation with services active in the fight against money laundering with proceeds from criminal activities, as well as in the prosecution of cybercrime. Furthermore, these services have the necessary resources, or are reinforced depending on the extent and dynamics of the case under investigation and make full use of 'Special Investigative Operations', as provided for in Article 254 of the Code of Criminal Procedure.

In the context of investigating cases of trafficking in human beings, the assistance of the Anti-Money Laundering Authority, which is the national unit responsible for taking and implementing the necessary measures to prevent, detect and combat money laundering from criminal activities, is also requested.

Finally, to ensure that the length of court proceedings in cases of trafficking of human beings is reasonable, Article 32 of the Code of Criminal Procedure and the last paragraph thereof, as amended by Article 100 of Law 4855/2021, which added the offences of Chapter 19 of the Special Part of the

Criminal Code (which also covers trafficking in human beings), provide that the Public Prosecutor of the Supreme Court may order the questioning and presentation of the case for trial as a matter of absolute priority.

- *Make full use of the available measures to protect victims of trafficking in human beings, including children, and to prevent intimidation during the investigation and during and after the court proceedings. Police officers, prosecutors and judges should be provided with the necessary training in order to ensure the application of such measures in practice.*

Apart of what was mentioned in previous paragraphs regarding the protection of victims of trafficking in human beings, especially women and children or unaccompanied minors and the training of the relevant frontline officers, we wish to add the following:

The Code of Criminal Procedure provides for a special status for victims of trafficking in human beings as witnesses, to be determined on a case-by-case basis. In fact, a psychologist or psychiatrist is appointed, as an expert, to prepare the victim for the examination and is present during the examination of the victim.

In more detail:

Article 228 of the Code of Criminal Procedure as amended by Law 4855/2021:

(a) added to par. 1 to the list of offences provided for, the offences of trafficking in human beings (323 CPC) and pimping (349 CPC)

(b) in Article 5 the possibility of an examination in the physical presence of the adult victim, if this is deemed necessary by the Court in a particular case.

Witnesses' victims of human trafficking

1. During the examination as a witness of the victim of the acts referred to in articles 323A, 336, para. 4 of Article 337, Articles 338, 343, 345 and para. 3 of Article 349 of the Penal Code, a psychologist or psychiatrist shall be appointed and present as an expert, without Articles 204 to 208 being otherwise applicable.

2. The psychologist or psychiatrist shall prepare the victim for the examination, in cooperation with the preliminary investigation officers and the judicial officers. To this end, he shall use appropriate diagnostic methods, assess the perceptive capacity and mental state of the victim and formulate his findings in a written report which shall form an integral part of the case file. The psychiatrist or psychologist shall be present during the examination and the victim may be accompanied by his or her legal representative, unless the investigating magistrate, by reasoned decision, prohibits the presence of that person for important reasons, in particular in the event of a conflict of interests or the involvement of that person in the act under investigation. Para. 3 of the preceding Article shall apply mutatis mutandis.

3. The victim's statement shall be in writing and shall also be recorded on an electronic audiovisual medium, where possible. Electronic viewing of the victim's statement shall replace the physical presence of the victim at subsequent stages of the procedure.

4. If it is not possible to view it electronically, the victim's written statement shall be read to the audience.

5. After the case concerning the acts referred to in par. 1, the public prosecutor or the parties may request the President of the Court to examine the victim if he or she has not been examined during the examination or if he or she requires additional examination. If the request is granted, the examination of the victim shall take place on the basis of clearly formulated questions, without the presence of the parties, at the place where the victim is present, by an investigator appointed by the judge who ordered the examination. In any case, for the offences referred to in par. 1, with the exception of the offences referred to in Article 323A of the PC, the court may, by means of a specially reasoned decision, order an examination in the physical presence of the adult victim, in accordance with the formalities laid down in Article 330 of the CCP, if this is deemed absolutely necessary in order to ascertain the truth. Paras. 1 and 2 of this article shall also apply in such cases.

In conclusion, Greece has continuously stepped-up efforts towards preventing and combatting of the heinous crime of trafficking in human beings, through the introduction of pivotal legal and institutional instruments and made significant progress since the adoption of Greta's first evaluation report (2017) and the Committee of the Parties' relevant recommendations.

The Greek Penal Code amendments significantly improved the legal framework by adding new forms of exploitation, thus covering more than the minimum forms in the existing international, regional and European instruments. The National Referral Mechanism was officially launched and is now fully operational for the identification and referral of THB victims.

Moreover, we have taken concrete measures to protect children and unaccompanied minors from THB victimization with the establishment of the Special Secretariat for the Protection of Minors, (now General Secretariat for Vulnerable People and Institutional Protection) at the Ministry of Migration and Asylum and the setting up of the National Emergency Response Mechanism (NERM) with the aim of creating a safety net and offering protection to the most vulnerable of unaccompanied/separated minors.

The Office of National Rapporteur on Trafficking in Human Beings (ONR/MFA) follows a proactive approach to the early identification of THB victims. A series of training programmes on THB indicators and victim protection Standard Operating Procedures (SOPs) have taken place involving a wide range of beneficiaries from law enforcement authorities to Reception and Identification Centers (RICs) throughout Greece.

Nowadays, the Office of National Rapporteur is in the process of setting up a working group with the collaboration of all the relevant state and non-state actors to update the National Action Plan 2019-2023, so as to renew our strategy and adjust it to the ever-changing nature of the crime for successfully combating THB in all of its forms at the institutional, legislative and practical levels.

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

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

The recommendations, as well as, the further conclusions of GRETA's second evaluation report will be a major orientation for the preparation of our new National Action Plan.

It goes without saying that we are grateful to GRETA for its cooperation and valuable contribution towards the full implementation of the Convention and we reiterate that Greece remains committed to continuing this fruitful cooperation in order to achieve higher standards in preventing and combating trafficking in human beings and to overcome the ongoing challenges.