

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



CP(2025)05

Report submitted by the authorities  
of Slovenia  
on measures taken to comply with  
Committee of the Parties Recommendation  
CP/Rec(2023)07 on the implementation  
of the Council of Europe Convention  
on Action against Trafficking in Human Beings

Third evaluation round

Received on 8 July 2025

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## REPORT OF THE REPUBLIC OF SLOVENIA ON MEASURES TAKEN TO COMPLY WITH THE RECOMMENDATIONS OF THE 3<sup>RD</sup> ROUND EVALUATION ON THE IMPLEMENTATION OF THE COUNCIL OF EUROPE CONVENTION ON ACTION AGAINST TRAFFICKING IN HUMAN BEINGS

### I. TOPICS RELATED TO THE THIRD EVALUATION ROUND OF THE IMPLEMENTATION OF THE CONVENTION

#### **Right to information**

- 1. GRETA welcomes the availability of information materials in different languages for victims of trafficking and considers that the Slovenian authorities should continue to make efforts to ensure that all presumed and formally identified victims of trafficking are proactively informed of their rights, including the right to a recovery and reflection period, the available support services and how to receive them, and the consequences of their being recognised as victims of trafficking (paragraph 42).**

In accordance with established practice, financial resources for information materials, which are prepared in various languages by non-governmental and humanitarian organizations, were provided by the Ministry of the Interior and the Ministry of Labour, Family, Social Affairs and Equal Opportunities, also during the reporting period as part of the projects "Care for victims of human trafficking – crisis accommodation" and "Care for victims of human trafficking – safe accommodation". The information material financed by the Ministry of Labour, Family, Social Affairs and Equal Opportunities was intended for children and young people, while the material financed by the Ministry of the Interior was intended for foreigners.

During the identification process, the police inform all victims or presumed victims of human trafficking, in accordance with the Manual on the Identification, Assistance and Protection of Victims of Trafficking in Human Beings (hereinafter: the Manual) of their right to assistance and support, their right to safe accommodation during recovery and reflection, and their right to participate in criminal proceedings. Victims also receive information material in a language they understand. Non-governmental and humanitarian organizations always participate in the procedures.

The website of the Slovenian judiciary (<https://nasodiscu.si/>) provides summary information and detailed brochures to help victims of crime find their way around criminal proceedings (including the position of witnesses, rights relating to property claims, etc.). Some information is also available in English (in the form of an animation).

The Government Office for the Support and Integration of Migrants also places great emphasis on informing the persons accommodated; all information is available in various languages, provided orally, in form of leaflets as well as in digital form (presentation films, QR codes). This involves providing information about various support programmes, the work of non-governmental organizations, and the operation of accommodation facilities, legal assistance, rights and obligations. An introductory interview is conducted with all the persons accommodated in a language they understand, followed by further interviews. All accommodations also offer Slovenian language courses, of which the persons accommodated may take advantage.

The Government Office for the Support and Integration of Migrants cooperates with various organizations and authorities and encourages them to participate in events and activities that help expand social networks and facilitate integration into Slovenian society. A contract is currently being signed with a non-governmental organization that will provide information on various topics to the persons accommodated in the centres and help them integrate into Slovenian society. In accommodation facilities where vulnerable groups of people are housed, self-help groups are also organized by non-governmental organizations as part of their programmes.

Meetings with the persons accommodated are also held regularly at the accommodation facilities according to a set schedule, with interpreters provided. The purpose of these meetings is to ensure various information and to provide a forum for suggestions on how to improve the stay at the accommodation facilities and to promote socialisation among the persons accommodated. The response to these meetings has been very positive.

## **Legal assistance and free legal aid**

- 2. GRETA urges the Slovenian authorities to make additional efforts to guarantee access to justice for victims of trafficking, in particular by ensuring that:**
  - a) legal assistance is provided as soon as there are reasonable grounds for believing that a person is a victim of human trafficking, before the person concerned has to decide whether or not he/she wants to co-operate with the authorities and/or make an official statement;**

With regard to legal assistance, Slovenia considers it essential that a person who is presumed to be a victim of a criminal offence or acts related to trafficking in human beings is willing to acknowledge that they are a victim of human trafficking, which is only possible in the form of an official finding (for example, by filing a criminal complaint with the competent state authority, acknowledging witness status, etc.). We therefore see no possibility of offering them legal assistance without at least minimal cooperation on their part. The decisive factor here is not the financial aspect, but the legal status of the victim of a criminal offence.

- b) access to free legal aid for victims of trafficking is not subject to means-related, nationality or residence requirements, and is available throughout the criminal proceedings (paragraph 51).**

As long as victims of crime are accessible to Slovenian authorities, communication regarding free legal aid is possible, but if they break off contact or leave the Republic of Slovenia, they are effectively unreachable. Experience shows that victims do not want further contact once they leave Slovenia.

### **3. GRETA considers that the Slovenian authorities should:**

- a) alert the Bar Association to the need to encourage training and specialisation of lawyers, with a view to providing legal assistance to victims of trafficking, including child victims;**

We agree with the recommendation that discussions should be held with the independent Bar Association of Slovenia and independent lawyers on promoting their independent training and specialization of lawyers who would provide legal assistance to victims of trafficking in human beings, including children.

- b) review the system of remuneration of lawyers (paragraph 52).**

The Republic of Slovenia has taken note of the recommendation and will further examine the system of remuneration for lawyers (attorneys), including in the context of the amendments already adopted to the fifth paragraph of Article 17 of the Attorneys Act of 2022 (Official Gazette of the Republic of Slovenia, No. 130/22).

## **Psychological assistance**

- 4. GRETA considers that the Slovenian authorities should take further steps to ensure that all victims of THB are provided with adequate and long-term psychological assistance to help them overcome the trauma they have been through, and to achieve a sustained recovery and social inclusion (paragraph 55).**

Psychosocial support for victims of trafficking is provided by non-governmental organizations within the framework of assistance programmes (crisis and safe accommodation) financed by the Ministry of the Interior and the Ministry of Labour, Family, Social Affairs and Equal Opportunities. Already in the crisis accommodation programme, a personal assistance plan is drawn up for each victim with the aim of their resocialisation and revitalisation. Socialisation and revitalisation measures are implemented even more intensively later on in the context of care in a safe environment, where various activities are carried out in terms of education, training, expanding social networks, acquiring a profession, and seeking employment opportunities.

The Republic of Slovenia is aware of the importance of reintegrating victims of trafficking into society and ensuring opportunities for them to live independently, free from violence, exploitation and human rights violations. Since 2019, the Ministry of the Interior has been financing the project Reintegration of victims of trafficking in human beings, for which it again obtained European funding last year under the EU Internal Security Fund. Since October 2024, the programme "Continuation of the protection of victims of human trafficking and their reintegration in the Republic of Slovenia for the period 2024-2027" has been implemented with a budget of EUR 150,000, which is being run by the Ključ Society on the basis of a public call for proposals. The project is intended for citizens of the Republic of Slovenia who have been treated as victims of human trafficking abroad, as well as citizens of European Union countries and

third-country nationals who have been treated as victims of human trafficking in the Republic of Slovenia in pre-trial or criminal proceedings and are legally residing in the Republic of Slovenia. 10 people were included in the programme in 2023, and 9 in 2024. They were provided with all necessary psychosocial support, accommodation in supported housing, assistance and support in arranging documents, learning, finding safe employment, accompaniment to institutions, and inclusion in individual and group counselling activities.

#### **Access to work, vocational training and education**

- 5. GRETA considers that the Slovenian authorities should strengthen the effective access to the labour market for victims of THB and their economic and social inclusion through the provision of vocational training and job placement, raising awareness amongst employers, and the promotion of micro-businesses, social enterprises and public-private partnerships, including through state supported employment programmes, with a view to creating appropriate work opportunities for victims of trafficking (paragraph 62).**

As explained in the previous paragraph, the reintegration programme includes a number of activities aimed at economic and social reintegration into society, including the provision of vocational training and possible further education in accordance with individual assistance plans.

In May 2025, a meeting was held between representatives of the Ministry of the Interior, the Anti-Trafficking Service, and the Employment Service of Slovenia with the aim of strengthening cooperation in the areas of preventive action and awareness-raising among employers, as well as assistance to victims of trafficking in finding suitable employment.

#### **Compensation**

- 6. GRETA urges the Slovenian authorities to examine the reasons for the absence of compensation claims and awards to victims of trafficking, and to make efforts to guarantee effective access to compensation for victims of THB, in line with Article 15 (4) of the Convention, including by:**
  - a) **ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain from the exploitation of the victim or loss sustained by the victim, is part of the criminal investigations with a view to supporting compensation claims in court;**

The police and the Specialised Office of the State Prosecutor of the Republic of Slovenia are actively making sure that when dealing with pre-trial and criminal proceedings, criminal investigations also include collecting evidence on harm suffered by victims and on financial gains obtained through victims' exploitations or losses suffered by victims.

- b) **enabling victims of trafficking to effectively exercise their right to compensation, by ensuring their access to information, legal assistance and legal aid throughout the duration of the criminal proceedings, and building the capacity of legal practitioners to support victims in claiming compensation;**

In most cases, the police are the first point of contact for victims of human trafficking, and are therefore aware of the importance of working with victims and informing them about the possibilities and conditions for exercising their rights.

When dealing with criminal offences, the police shall, upon notification of a criminal offence, enter the received oral complaint in the record pursuant to Article 147 of the Criminal Procedure Act. When a person reports an intentional crime, the application used to fill out the form enables the police officer to inform the victim about their rights under the Crime Victims Compensation Act. These rights are also listed on the copy of the report of the oral criminal complaint submitted to the victim. Upon receiving an oral complaint, police officers take the opportunity to provide the victim of a criminal offence with any additional information regarding their rights under the Crime Victims Compensation Act and hand them a leaflet on the rights of victims of criminal offences (or print it out) or refer them to the website of the Ministry of Justice.

In 2023, the police dealt with 21 victims of human trafficking, and in 2024, with 17 victims, of whom only four were EU citizens, while the rest were third-country nationals. The police informed them of their rights under the Crime Victims Compensation Act verbally, also with the help of an interpreter. We note that most victims of trafficking do not want additional proceedings, as the (pre-)criminal proceedings or court hearings alone represent a significant

burden or stress for them due to all the trauma they have experienced. An additional reason why victims are completely uninterested in this when they are informed of their rights under the Crime Victims Compensation Act is their high vulnerability and weak social network, which would provide them with additional support in this regard. On the other hand, according to the experience of the police, some persons in pre-trial proceedings do not even recognize themselves as victims of a criminal offence and therefore do not accept the assistance offered to them.

Non-governmental organizations that have the most successful confidential relationships with victims of human trafficking have therefore been repeatedly called upon to actively encourage them to exercise their rights under the Crime Victims Compensation Act. Notwithstanding the above, no request was submitted in 2024 or 2025 (until 31 May 2025). Slovenia will continue its efforts to empower victims of human trafficking to exercise their rights under the Crime Victims Compensation Act.

- c) **making full use of the legislation on the freezing and forfeiture of assets, as well as international co-operation, to secure compensation to victims of THB, and ensure that recoverable property which is seized in criminal proceedings is returned as soon as possible to the victim;**

The Specialised Office of the State Prosecutor of the Republic of Slovenia is actively involved in the freezing and confiscation of illegally acquired assets (Criminal Procedure Act) and/or the confiscation of assets of illegal origin (Confiscation of Illegal Property Act), using international cooperation, including joint investigation teams (JITs).

- d) **reviewing the eligibility criteria for state compensation with a view to making it available in practice to victims of trafficking, and including all victims of trafficking in the scope of the Crime Victim Compensation Act, irrespective of their nationality and of whether or not they claimed and obtained compensation during criminal or civil proceedings (paragraph 76);**

The eligibility criteria for state compensation do not need to be reviewed, as the system for victims of violent crimes generally works well in practice and, as already mentioned, even encouragement from non-governmental organizations does not contribute to better implementation of victims' right to compensation. There are no conditions regarding other procedures in Slovenian legislation, and the citizenship requirement was also removed from the Crime Victim Compensation Act in 2023 (Official Gazette of the Republic of Slovenia, No. 76/23).

7. **GRETA considers that the Slovenian authorities should take further steps to enable access to compensation for victims of trafficking by making compensation awarded in criminal proceedings payable by the State if the perpetrator has not paid the victim within a set period of time, and the State taking the responsibility to try to recover the amount from the perpetrator (paragraph 77).**

The Republic of Slovenia agrees in principle that this issue should be examined, but only once a reasonably established case law has been developed.

#### **Investigations, prosecutions, sanctions and measures**

8. **GRETA urges the Slovenian authorities to take additional measures to strengthen the criminal justice response to THB, including by:**
  - a) **ensuring that human trafficking offences are proactively and promptly investigated, regardless of whether a complaint about the reported crime has been submitted or not, by making use of special investigation techniques in order to gather material, documental, financial and digital evidence, and not having to rely exclusively on testimony by victims or witnesses;**

The police carry out activities in the field of detecting and investigating organised criminal groups involved in human trafficking on the basis of the Annual Work Plan of the Police. When investigating these crimes, the police almost always use special investigative measures that allow them to collect different types of evidence. This approach ensures that investigations do not rely solely on the statements of victims or witnesses, which is particularly important for the protection of vulnerable persons and the prevention of further traumatising.

In 2023, the Slovenian police identified 21 victims of human trafficking and 60 potential<sup>1</sup> victims. All identified victims were female and had been sexually exploited. During the reporting period, the police also dealt with one case in

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<sup>1</sup> A person who was considered a victim of human trafficking, but in the pre-trial proceedings the police found that there were no grounds for filing a criminal complaint, therefore submitted a report to the Specialised Office of the State Prosecutor of the Republic of Slovenia (paragraph 10 of Article 148 of the Criminal Procedure Act).

which a minor victim from Slovenia was identified. The police investigated a total of 16 people on suspicion of human trafficking.

In 2024, the Slovenian police identified 17 victims of human trafficking and 28 potential victims of trafficking. Among the latter, the majority of citizens were citizens of the Philippines (10) and Romania (8) and were subjected to labor exploitation. The identified victims were all female and were sexually exploited. In 2024, the police investigated a total of 19 individuals and 2 legal entities on suspicion of committing the crime of human trafficking.

Also this year, the police have already identified several cases of human trafficking. In addition to the predominant form of sexual exploitation, criminal acts of labour exploitation and forced marriage also occur.

The Specialised Office of the State Prosecutor of the Republic of Slovenia, which, under the applicable legislation, has exclusive jurisdiction over the prosecution of all criminal acts in the field of trafficking in human beings, together with state prosecutors specialising in this area of law, including through the use of covert investigative measures and active investigation in cases involving the abuse of the vulnerability of victims and in cases involving labour exploitation, ensures that such crimes are investigated proactively and swiftly.

**b) sensitising investigators, prosecutors and judges on the rights of victims of THB and the importance of preventing secondary victimisation, and encouraging the development of specialisation amongst judges to deal with THB cases;**

The police and other competent institutions consistently implement appropriate measures to prevent secondary victimisation of victims of human trafficking. The principles of respect for human rights, dignity, and the need for protection and psychosocial support shall be observed in the identification, questioning, and provision of assistance to victims. Police officers receive special training in dealing with vulnerable groups, cooperate with non-governmental organisations and other experts, and ensure that victims' contact with the criminal justice system is as non-traumatic as possible. Furthermore, in 2024, a lecture on human trafficking with a duration of two school hours was held at the Police Academy for students of the Police College, which was attended by 130 students. Other than that, the topic of human trafficking is also covered in the regular curriculum of the criminalistics course.

With regard to preventing secondary traumatising of victims in criminal proceedings, the Criminal Procedure Act contains several provisions ensuring that victims in criminal proceedings are treated with respect, dignity, and in a manner that minimises the risk of further psychological stress, namely:

- interviewing vulnerable victims via videoconference or using technical means, thereby preventing direct contact with the accused and reducing psychological pressure;
- limiting the number of interviews with victims to prevent them from reliving the trauma – in case of minors and particularly vulnerable persons, interviews are generally conducted only once, with the possibility of video recording for further proceedings;
- interviewing victims in the presence of a professional such as a psychologist or social worker, if necessary to protect their mental health;
- exclusion of the public from the main hearing when this is necessary to protect the interests of the victim;
- hearing without the presence of the accused, whereby the accused is given the opportunity to ask questions through their defence counsel;
- measures to protect the privacy of the victim, including a ban on the publication of personal data, photographs, and other information that could lead to the victim's identification.

As part of judicial reform, preparations are underway to establish more permanent and specialised services within the judiciary at the district court level to assist victims of human trafficking. Solutions may be specified in the Court Rules.

**c) ensuring that trafficking offences are classified as such every time the circumstances of a case allow this, including cases characterised by the absence of physical violence, and lead to effective, proportionate and dissuasive sanctions for those convicted;**

As the competent authority for identifying victims of human trafficking, the police are aware that an effective response to the various forms of human trafficking requires police officers and criminal investigators to have the knowledge and professional approach to recognise and identify victims, who are often hidden from the public or cannot be identified due to other forms of criminal activity. Human trafficking offences do not always include physical violence, but may also involve other, more subtle forms of exploitation and control. Slovenian police officers are therefore trained to recognize various indicators of human trafficking, such as psychological violence, threats, manipulation, restriction of freedom, and financial exploitation. This integrated approach enables the police to detect and prevent various forms of human trafficking in a timely manner and to protect vulnerable persons effectively.

As regards criminal sanctions, we consider that the existing framework for punishing the criminal offence of trafficking in human beings under Article 113 of the Criminal Code is, in principle, adequate.

**d) strengthening efforts to investigate, prosecute and convict traffickers of labour exploitation;**

We are aware that labour exploitation is less recognized form of human trafficking offense in Slovenia. In this regard, recent findings indicate that it is precisely the legal provisions regarding the exploitation of victims for the purpose of forced labour that significantly limit the investigation of human trafficking crimes. Under the current legislation, when a form of labour exploitation is identified, it is also necessary to recognize and prove the legal element of forced labour, which in practice presents challenges. As a result, investigations into suspected human trafficking for labour exploitation are often reclassified as other officially prosecutable criminal offences, particularly violations of fundamental workers' rights under Article 196 of the Criminal Code.

In 2023, the Ministry of the Interior therefore prepared an analysis of EU Member States' legislation on 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 trafficking in human beings 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 an initiative 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. Changes are planned for next year as part of the adoption of the amendment to the Criminal Code and amendments to Article 113 in light of the transposition of the provisions of Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims.

**e) conducting a comprehensive assessment of the effectiveness of the criminal law provisions concerning THB and related offences. The authorities should be prepared to readjust on the basis of such an assessment the content and/or the application of the relevant provisions with a view to addressing any shortcomings identified (paragraph 96);**

In 2024, a public call for proposals was launched to select research projects under the Targeted Research Programme, co-funded by the Slovenian Research Agency (ARIS). The project, which has been proposed for implementation, is guided by the decline in convictions for human trafficking in recent years and the varying judicial practice in the area of human trafficking offences dealt with by the specialized departments of district courts at the seat of higher courts (Ljubljana, Maribor, Celje, and Koper) in Slovenia recently, which points to the need for a comprehensive and in-depth expert analysis of the provisions of criminal law and judicial practice in this sensitive area over the last ten years. The aim of the analysis is to objectively assess the actual situation and provide recommendations for more effective prosecution of such crimes, including proposals for possible legislative changes. In the CRP 2024 public call for proposals, the Institute of Criminology at the Faculty of Law in Ljubljana was selected to carry out a 12-month research project. A budget of EUR 30,000 has been allocated for the project. Some of the activities within the project were already carried out in 2024, and the project is expected to be completed in the last quarter of 2025.

**9. GRETA considers that the Slovenian authorities should take further steps to ensure 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 (Article 6, paragraph 1 of the ECHR) and the standards set by the European Commission for the Efficiency of Justice (CEPEJ) (paragraph 97).**

We consider the recommendation to be appropriate and applicable to all court proceedings in Slovenia. We would like to emphasize that the European Commission no longer highlights the issue of the length of court proceedings in its Justice Scoreboard for Slovenia.

### **Non-punishment provision**

- 10. GRETA once again urges the Slovenian authorities to take additional measures to 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, as contained in Article 26 of the Convention. Such measures should include the adoption of a specific legal provision and/or the development of guidance for police officers and prosecutors on the non-punishment provision (paragraph 102).**

As already explained in the questionnaire in the third evaluation round, the principle of impunity for victims of trafficking in human beings is guaranteed in the Republic of Slovenia by Article 23 of the Criminal Code, which stipulates that any act committed under coercion that the perpetrator is not able to resist shall not constitute a criminal offence. In our opinion, this Article sufficiently transposes the non-punishment provision in Article 26 of the Council of Europe Convention on Action against Trafficking in Human Beings. We reiterate that in practice, victims of trafficking in human beings are not known to have been prosecuted, convicted or punished. Nevertheless, Slovenia will take this recommendation into account by devoting a specific chapter to this issue in the update of the Manual, which is planned for the end of this year.

### **Protection of victims and witnesses**

- 11. GRETA urges the Slovenian authorities to ensure that there is an effective separation in court buildings of victims and defendants which prevent defendants from intimidating or influencing victims and witnesses in THB cases (paragraph 111).**

While respecting the independence of the judiciary and the separation of powers, the Government of the Republic of Slovenia will remind courts to assess the feasibility of such separation in courtrooms for all victims of criminal offences.

- 12. GRETA considers that the Slovenian authorities should:**

- a) **make full use of the available measures to protect vulnerable victims and witnesses of THB and to prevent intimidation during the investigation, as well as during and after the court proceedings;**

The Specialised Office of the State Prosecutor of the Republic of Slovenia is actively committed to ensuring that witnesses and victims are heard in court with protective measures granted when the legal conditions are met.

- b) **build the awareness of all actors in the criminal justice system on how to avoid re-victimisation and stigmatisation of victims of THB through training and awareness-raising, as well as prioritising the rights, needs and interests of victims;**

See reply under point 8.b.

- c) **ensure that the cross-examination (direct confrontation) of victims and defendants in THB cases is avoided, to the extent possible, making use of audio-visual equipment and other appropriate methods (paragraph 112).**

Article 84a of the Criminal Procedure Act stipulates that the hearing, preliminary hearings, main hearings, and panel hearings may also be conducted using technical means for the transmission of images and sound (videoconferencing) under certain conditions (secure data transmission, serious danger to the life or physical integrity of the victim or persons related to the victim).

### **Specialised authorities and co-ordinating bodies**

- 13. GRETA positively notes the existence of police investigators and prosecutors specialised in dealing with THB and considers that the Slovenian authorities should promote specialisation of judges to deal with THB, and that the training on THB should be systematic and periodically updated, and should further promote capacity-building and specialisation, with a view to enabling the proactive investigation and successful prosecution of human trafficking cases (paragraph 120).**

As part of judicial reform, preparations are underway to establish more permanent and specialised services within the judiciary at the district court level to assist victims of human trafficking. Solutions may be specified in the Court Rules.

In addition, Slovenia will actively continue the existing training of judges and prosecutors in the area of combating trafficking in human beings within the framework of the autonomous Judicial Training Centre at the Ministry of Justice.

### **International cooperation**

#### **14. GRETA welcomes the participation of the Slovenian authorities in international co-operation in the area of combating THB and their efforts to conclude cooperation agreements with neighbouring states, and invites them to continue their efforts, particularly with regard to a greater use of Joint Investigation Teams in the investigation of cases of THB (paragraph 126).**

In the area of combating trafficking in human beings, the Republic of Slovenia strives for constructive cooperation with other countries, especially with the countries of origin of victims of trafficking. In doing so, it continues to pay particular attention to the Western Balkans region and activities within the informal network of national coordinators of South-East Europe (hereinafter: the NATC SEE network), which was established at Slovenia's initiative in 2010. Since the last report, the Republic of Slovenia has organised three network meetings.

In 2023, the NATC SEE meeting took place in June in Skopje, North Macedonia. At the meeting, participants reported on the activities carried out and planned by network members in the field of combating trafficking in human beings and discussed current trends and challenges in the region. Participants also discussed the proposal for amendments to the EU Directive on preventing and combating trafficking in human beings and protecting its victims, presented by the European Commission in December 2022.

In 2024, the network meeting took place in June in Zagreb, Croatia. At the meeting, the Slovenian delegation presented to participants the latest developments in EU legislation on combating trafficking in human beings, with a focus on the revision of Directive 2011/36/EU. Participants also discussed the importance of new EU legislation in the field of preventing forced labour (the proposal for a directive of the European Parliament and of the Council amending Directive 2013/34/EU, Directive 2004/109/EC, Directive 2006/43/EC and Regulation (EU) No 537/2014 on corporate sustainability reporting, the proposal for a Regulation of the European Parliament and of the Council on prohibiting products made with forced labour on the Union market) and other challenges related to implementation into national legislation.

The last meeting of the NATC SEE network was organised by the Ministry of the Interior on 27 and 28 March 2025 in Brdo pri Kranju, Slovenia, on the sidelines of the Brdo Process ministerial conference. At the meeting, representatives of the network adopted, among other things, a new strategic document for the period 2025-2029, which highlights the possibility of expanding the network's membership to other countries, strengthening preventive activities, improving support services for victims, involving new actors in policy-making, more effective prosecution of perpetrators, data exchange, and strengthening international cooperation at both the strategic and operational levels. On 28 March, the issue of human trafficking in the Western Balkans was also discussed by the ministers of the interior from the Brdo Process countries, who gave a positive assessment of the network's new work strategy for the period 2025-2029 and concluded that the document not only builds on past efforts, but also establishes new approaches that will contribute to sustainable solutions, encourage better international cooperation, and strengthen existing protection mechanisms.

When investigating criminal offences related to trafficking in human beings, the police exchange information with EU Member States through Europol and with third countries through Interpol. In 2023, they exchanged 35 pieces of information this way, in 2024, 51 pieces. In the area of investigating human trafficking, they also continued to participate in the EU policy cycle for combating serious forms of international organised crime. Within the framework of the European Multidisciplinary Platform Against Criminal Threats (EMPACT), they participated in three European joint actions against human trafficking in 2023 and four in 2024.

Between 8 and 14 May 2023, the police participated in joint actions of EU Member States in the field of preventing forced criminal activities and forced begging. Stricter controls were implemented to identify victims of human trafficking who are exploited for prostitution and sexual abuse, forced begging, forced criminal activities, and other forms of exploitation of victims of human trafficking. One of the objectives of the operation was also to identify individuals involved in human trafficking or other criminal offences subject to public prosecution. The activities were carried out at border crossing points and within the country in the areas covered by the police administrations of Ljubljana, Maribor, Koper, and Celje. During the activities, the police did not identify any victims of human trafficking.

Between 10 and 17 June 2023, the police participated in joint actions of EU Member States in the field of preventing forced labour. The activities were led by the Labour Inspectorate of the Republic of Slovenia, with the participation

of representatives from the Financial Administration of the Republic of Slovenia and the Association of Free Trade Unions of Slovenia. The purpose of the activity was to identify victims of human trafficking who were exploited for forced labour or other forms of exploitation. The police carried out activities at international border crossing points and at the air border crossing point at the Jože Pučnik Ljubljana Airport, but did not identify any victims of human trafficking.

In September 2023, the police participated in EU Member States' activities targeting internet platforms and websites offering sexual services and recruiting victims for sexual exploitation by criminal organizations. One of the objectives of the operation was to identify individuals involved in human trafficking or other criminal offences subject to public prosecution, using social networks, websites and the dark web related to human trafficking. The activities were carried out at the Netherlands Police Academy, with the participation of a large number of experts from foreign security authorities.

Between 24 May 2024 and 3 June 2024, the police participated in joint actions of EU Member States in the field of human trafficking and migration. Stricter controls were implemented to identify victims of human trafficking who are exploited for prostitution and sexual abuse, as well as other forms of exploitation of victims of human trafficking in illegal migration. One of the objectives of the operation was also to identify individuals involved in human trafficking or other criminal offences subject to public prosecution. Activities were carried out throughout Slovenia. During the activities, the police did not identify any victims of human trafficking.

Between 3 and 9 June 2024, activities were carried out simultaneously in the EU Member States as part of Joint Action Days (JAD) with the aim of identifying victims of trafficking in human beings who are exploited for the purpose of forced criminal activities, begging, and prostitution. Activities between Member States were coordinated by Europol, together with Frontex.

Between 20 and 27 April 2024, the Slovenian police participated in joint actions of EU Member States in the field of preventing forced labour. The activities were led by the Labour Inspectorate of the Republic of Slovenia, with the participation of representatives from the Financial Administration of the Republic of Slovenia and the Association of Free Trade Unions of Slovenia. The purpose of the activity was to identify victims of human trafficking who were exploited for forced labour or other forms of exploitation. Activities between Member States were coordinated by Europol and ELA.

Between 16 and 20 September 2024, the Slovenian police participated in EU Member States' activities targeting internet platforms and websites offering sexual services and recruiting victims for sexual exploitation by criminal organisations. One of the objectives of the operation was also to identify individuals involved in human trafficking or other criminal offences subject to public prosecution. Another one of the objectives of the operation was to identify individuals involved in human trafficking or other criminal offences subject to public prosecution, using social networks, websites and the dark web related to human trafficking. The activities were carried out at the Netherlands Police Academy, with the participation of a large number of experts from foreign security authorities.

The Specialised Office of the State Prosecutor of the Republic of Slovenia is also actively involved in international cooperation, including through the use of joint investigation teams (JITs).

### **Child-sensitive procedures for obtaining access to justice and remedies**

- 15. GRETA once again urges the Slovenian authorities to 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, taking into account the best interests of the child and in order to bring such measures in full conformity with the Convention (paragraph 134).**

If it is assessed that the current system for children under the age of 15 may not be optimally effective, the Republic of Slovenia will examine the possibility of its revision (implementation of the current Protection of Children in Criminal Procedure and their Comprehensive Treatment in the Children's House Act, Official Gazette of the Republic of Slovenia, No. 54/21 - referring to the use of procedural protection measures currently reserved for the children under the age of 15). After the assessment, a systemic revision will also be carried out regarding the extension of the application of procedural protection measures to all child victims and witnesses of abuse-related offences up to the age of 18, taking into account the best interests of the child.

- 16. GRETA considers that the Slovenian authorities should ensure that child victims of trafficking are in practice afforded special protection measures, including in the context of interviews, both as regards the competencies of the professionals present and the environment in which the interviews are conducted. In this context, GRETA refers to the Guidelines of the Committee of Ministers of the Council of Europe on child-friendly justice (paragraph 135).**

Specially trained criminal investigators carry out the police procedures with child victims (especially the victims of trafficking). Although human trafficking offences are handled by investigators dealing with organised crime, the specially trained investigators partake in these investigations due to their specialised knowledge/expertise and special training in conducting interviews with adolescents and children, which is essential. Criminal investigators investigating online child sexual offences receive ongoing training from national and international experts, where they exchange information on new trends, investigative methods and tools, and other, all with a view to effectively perform investigations and protect the children.

In the Republic of Slovenia, all minors who are witnesses or victims of violence are accommodated in the Children's House. The Children's House is a child-friendly and safe environment that brings together several services for the treatment of victims under one roof, in a coordinated and effective manner. This prevents re-traumatisation during the investigation procedure and the court proceedings. The main objective is to co-ordinate concurrent criminal investigations and child protection procedures. The key role of the service is to gather valid evidence that can be used in court proceedings by encouraging the child to participate in the interview and obtain the required information from him/her. The child also receives help and support, including medical assessment and care, mental health assessment and therapy.

### **Role of business**

- 17. GRETA considers that the Slovenian authorities should further strengthen engagement with the private sector, in line with the UN Guiding Principles on Business and Human Rights and Council of Europe Committee of Ministers Recommendation CM/Rec(2016)3 on human rights and business and Recommendation CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation with a view to raising awareness of the important role and responsibility of businesses in supporting the rehabilitation and recovery of victims, and to provide access to effective remedies (paragraph 139).**

Slovenian authorities continued their activities to strengthen cooperation with the private sector. In 2023, on the occasion of the EU Anti-Trafficking Day, the Ministry of the Interior and the Government Communication Office launched a project to raise awareness on trafficking in human beings for forced labour and labour exploitation, which was carried out by the Association DrogArt, the social enterprise 'Iz principa' ('Out of principle'). The project raised awareness about trafficking in human beings among the general public and vulnerable groups by means of live "artefacts" (exploited workers) in sales packages, which were displayed on the main pedestrian streets in Maribor and Ljubljana between 18 and 20 October. In order to raise the awareness on trafficking in human beings among employers, the project prepared an e-catalogue of different profiles of the most frequently exploited workers, which, together with the Manual for employers published by the Ministry of the Interior in 2020, was distributed to over 200 companies in Slovenia. A media event was also held on 18 October to present the project and to mark the EU Anti-Trafficking Day, which was attended by the National Coordinator and representatives of the Labour Inspectorate, the Counselling Office for Workers and the Ključ Society.

In line with the Action Plan, the Inter-ministerial Working Group for Combating Trafficking in Human Beings (IWG) will continue to promote the Manual for employers and raise awareness among employers at risk of being associated with trafficking in human beings for the purpose of forced labour. In cooperation with the Ministry of the Economy, Tourism and Sport, it will also inform employers about the relevant EU legislation in this area, especially the content of the Regulation of the European Parliament and of the Council on the prohibition of products produced through forced labour on the Union market, and the Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859 (CSDDD). The IWG will also continue to actively participate in the implementation of the National Action Plan on Business and Human Rights (NAP), which promotes the development of human rights due diligence in business.

- 18. GRETA considers that the Slovenian authorities should adopt legislation promoting transparency in supply chains to enable scrutiny of companies' performance to prevent THB and labour exploitation (paragraph 140).**

Business entities established under Slovenian law or operating in Slovenia are bound to respect and protect human rights. In 2018, the Government of the Republic of Slovenia adopted the NAP, the implementation of which is monitored by the Ministry of Foreign and European Affairs in cooperation with other ministries and government offices. To date, 31 Slovenian companies have signed the NAP's pledge to respect human rights as set out in NAP. By signing this document, they confirm their voluntary commitment to respecting human rights throughout the entire business process.

As a member of the European Union, Slovenia is also bound to ensure that companies respect human rights and the environment with the Directive on corporate sustainability due diligence (CSDDD). The deadline for transposition of the CSDDD into national legislation is 26 July 2026. A special government inter-ministerial working group will be established to discuss the technical topics, find appropriate solutions and draft proposals for the transposition of the Directive into national law. The issues raised will also be addressed in the framework of the Targeted Research Programme.

## II. FOLLOW-UP TOPICS SPECIFIC TO SLOVENIA

### **Developments in the legislative, institutional and policy framework for action against human trafficking**

#### **19. GRETA considers that the Slovenian authorities should commission an independent evaluation of the National Action Plan for Combating Trafficking in Human Beings as a tool for assessing the impact of the activities and for planning future policies and measures to combat THB (paragraph 24);**

We agree with the recommendation regarding an independent evaluation of the National Action Plan to Combat Trafficking in Human Beings as a tool to assess the effectiveness of the activities and to plan future anti-trafficking policies and activities. As previously explained on the occasion of the GRETA visit to Slovenia, it was envisaged that the function of the National Rapporteur for Combating Trafficking in Human Beings would be taken over by the Office of the Ombudsman. In this context, a draft amendment to the Human Rights Ombudsman Act was prepared last year, but the legislative procedure has not yet been completed.

#### **20. GRETA considers that the Slovenian authorities should allocate sufficient resources, including human resources, to the Ombudsman's Office, with a view to ensuring an effective monitoring of the anti-trafficking activities of state institutions and making recommendations to persons and institutions concerned (see Article 29, paragraph 4, of the Convention and paragraph 298 of the Explanatory Report) (paragraph 26).**

See reply under point 19.

### **Data collection**

#### **21. GRETA considers that the Slovenian authorities should continue conducting and supporting research into trafficking in Roma communities (paragraph 146).**

During the reporting period the Office for National Minorities continued to implement the fundamental measures in the area of combating trafficking in human beings in connection with the phenomenon of forced, arranged and premature marriages and the flight of minors to harmful environments, in accordance with the National Programme of Measures for Roma of the Government of the Republic of Slovenia for the Period 2021–2030. The SIFOROMA 6 project will continue to provide awareness-raising and expert lectures entitled Identification of early and forced marriages in the Roma community and intervention, in the first half of 2025 and further in the second half of 2025 under the SIFOROMA 7 project.

### **Measures to prevent and combat trafficking for the purpose of labour exploitation**

#### **22. GRETA urges the Slovenian authorities to take additional steps to prevent and combat trafficking for the purpose of labour exploitation, taking into account 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, and in particular to:**

- a) ensure that sufficient staff and resources are made available to the Labour Inspectorate to enable it to play a frontline role in the prevention and identification of THB for the purpose of labour exploitation, including in situations where workers are posted to other EU countries;

On 31 December 2024, the Labour Inspectorate of the Republic of Slovenia (the Labour Inspectorate) had 132 employees; namely 100 inspectors and the Chief Inspector, the highest number in the history of the Inspectorate. 62 of the inspectors worked in the field of employment relationships control, 32 in the field of occupational safety and health, and 6 inspectors were employed in social affairs inspection.

The Labour Inspectorate has been recruiting new inspectors in 2025 and will continue to do so in the future. The Inspectorate currently employs 108 inspectors.

In 2024, the Labour Inspectorate set up a Priority Action Division, which became operational on 1 October 2024. The Division brings together employment relationships inspectors and occupational health and safety inspectors. In the field of labour law, inspections are carried out when the rights of a large number of workers are found to have been violated and when the taxable person has a prior criminal record, when the public interest is protected, when immediate response time is needed, when violations are found in the employment of foreigners and when workers are allowed to work in contravention of labour market regulations. In the case of detected and established infringements, supervision may be extended to several areas of labour law. In the field of occupational safety and health, the priority guidelines include the prevention of immediate danger to workers' lives and the risk of accidents at work. The Division also plays an important role in the detection of labour exploitation.

**b) ensure that labour inspectors, law enforcement officers and other relevant actors increase their outreach work to identify victims of human trafficking for the purpose of labour exploitation, paying particular attention to at-risk sectors, such as construction, transport and hospitality;**

Based on the findings of the inspections carried out so far, analyses of its own data and information from other supervisory authorities and stakeholders in the field of labour, the Labour Inspectorate of the Republic of Slovenia, in line with the programme guidelines, pays special attention in 2025 to the respect of the rights of third-country workers, the supervision of the provision of cross-border services, and the institution of the provision of work to the user employee, thus preventing the illegal lending of workers. The Labour Inspectorate therefore conducts systemic and other inspections to ensure compliance with the rules in these areas.

Due to increased migration flows and labour shortages, a growing share of the workforce is made up of foreign workers, particularly from remote third countries such as India, Bangladesh, Nepal, the Philippines, Egypt, Pakistan and Uzbekistan. These workers are employed either by Slovenian employers or by employers from other EU countries who post them to work in Slovenia and are considered a vulnerable group due to cultural differences, the language barrier, geographic separation from their home countries, and limited understanding of the Slovenian legal system and their own rights. These factors require labour inspectors to focus more closely on identifying potential cases of labour exploitation or forced labour, and to rigorously check that workers' labour and social rights—such as legitimate remuneration, working hours, rest periods, and adequate accommodation—are upheld. The Labour Inspectorate cooperates with the Employment Service of Slovenia and the work permit service. The free movement of goods, services and labour between EU countries has significantly facilitated labour mobility, as also evidenced by the growing number of cross-border services carried out by posted workers. Thus, many Slovenian employees are sent to work in other EU countries, while the number of workers posted from EU countries to Slovenia is also increasing. Inspections of cross-border services will be based on an analysis of mandatory employer reports on the provision of cross-border services, information obtained in other procedures and cooperation with other supervisory authorities, in particular the Financial Administration of the Republic of Slovenia and the Slovenian police. Focus will also be placed on Slovenian employers who send workers to other EU countries but do not meet all the legal requirements for posting workers abroad. To this end, the Labour Inspectorate works with the Health Insurance Institute of Slovenia (ZZZS) to ensure more effective monitoring and prevent infringements.

The Labour Inspectorate carries out inspections of activities where the risks of labour exploitation and trafficking in human beings are the highest.

In 2023 and 2024, the Labour Inspectorate carried out the following targeted inspections:

- targeted inspections in tourism and hospitality industries;
- a campaign to monitor the implementation of labour law in the construction sector;
- a campaign to monitor the implementation of Article 131 of the Employment Relationships Act of the Republic of Slovenia (ZDR-1) —payment of annual leave allowance;
- a targeted campaign of monitoring the compliance of Slovenian contracting authorities with the provisions of the Transitional Provision of Services Act (ZČmIS-1) in relation to workers of foreign employers, in conjunction with the Employment Relationships Act (ZDR-1) and compliance with the provisions of the Employment, Self-employment and Work of Foreigners Act (ZZSDT).

With regard to the recommendation that inspectors increase their outreach work in the transport sector, we report that a targeted campaign to monitor employers' compliance with labour law and occupational health and safety

regulations in the road freight transport sector was carried out from 17 February 2025 to 17 April 2025. In the field of employment relationships, the monitoring activities targeted compliance with labour law provisions regulating drivers' working hours, adequate remuneration for work, allowances related to working conditions, and the use of annual leave. Given the high number of foreign nationals employed as drivers, particular attention was paid to verifying compliance with the relevant provision of the Employment, Self-employment and Work of Foreigners Act. As some drivers are employed under civil law contracts, the inspectors checked whether these arrangements actually constituted an employment relationship. At the beginning of 2025, several inspectors were trained to monitor working time using recording equipment (tachographs). The inspection and infringement proceedings are still ongoing; however, provisional findings indicate that labour inspectors conducted 142 inspections and identified 99 violations in the field of employment relationships. At the time of reporting, 40 administrative measures and sanctions had been taken in relation to the identified irregularities.

As remuneration-related breaches continue to rank among the most frequent violations in the field of employment relationships, the focus of this year's monitoring campaign is on ensuring compliance with the provisions of the Employment Relationships Act (ZDR-1) relating to the payment of wages/salaries and annual leave allowance, and the provisions of the Minimum Wage Act (ZMinP). At the time of reporting, 347 inspections had been carried out, 110 violations had been identified and 65 administrative measures and sanctions had been imposed. Provisional data indicate violations of remuneration framework, with the majority relating to the payment of annual leave allowances. In the course of these inspections, labour inspectors also identified other violations of labour law, including deficiencies in record-keeping related to labour and social security, missing mandatory elements in employment contracts for work abroad, and violations concerning annual leave, working time, and temporary or occasional work by pensioners. The campaign will continue until the end of the calendar year.

As part of the European Week of Action on Wages/Remuneration 2025, the Labour Inspectorate, supported by the European Labour Authority (ELA), organised a Concerted and Joint Inspection (CJI) in Maribor in March 2025, with the inspectors from the German customs authority (Hauptzollamt Landshut) taking part as observers. The three-day visit of German counterparts was organised by three inspectors and the Slovenian ELA National Liaison Officer (NLO), all of whom also provided support throughout the event. At the suggestion of their German colleagues, the inspectors conducted a visit to a company employing both Slovenian and foreign nationals, mainly from Bosnia and Herzegovina and Serbia, who are assigned to work in Germany and some other EU countries. The CJI process is still ongoing.

In 2025, a monitoring campaign targeting employers entered in the register of domestic legal and natural persons for carrying out the activity of providing the work of workers to a user undertaking will also take place. Special attention will be given to verifying that posted workers are granted equal rights to those of employees in the user undertaking. The campaign will be running from June to September 2025. The monitoring will also evaluate the adequacy and effectiveness of existing legal provisions in regulating this area, with a particular focus on employer liability and the enforceability of remedies in cases of non-compliance.

Construction also remains a sector where violations of workers' rights under labour law are still frequently detected. Although there are still irregularities related to the payment of wages/salaries and annual leave allowances, the situation shows signs of gradual improvement. The construction sector is characterised by a complex work structure, with multiple entities frequently active on a single site—including legal persons and sole traders, self-employed contractors engaged by other business entities, and workers employed by foreign employers from the EU who are posted to Slovenia. Adding to the complexity of the situation are also foreign nationals working on these construction sites. Furthermore, these entities often cooperate under different agreements, written or verbal, leading to complex and intertwined business relationships. Due to these complex nature of these situations and the intertwined business cooperation between different entities, the Labour Inspectorate plans to carry out targeted inspections in June and autumn. The inspections will be implemented systematically and in a comprehensive way, with active participation from an increased number of labour inspectors and collaboration with the Financial Administration and the Slovenian police, both of which hold relevant jurisdiction in this field. Regarding occupational safety and health, construction sites are subject to intensified monitoring throughout the year.

In cooperation with the Slovenian Trade Union for Hospitality and Tourism Sector, the Labour Inspectorate will also carry out activities in the hospitality and tourism sector during the summer.

Moreover, the Labour Inspectorate has also been participating in European joint actions against trafficking in human beings since 2016. For more information on the activities carried out, see point 14.

As the supervisory authority for undeclared employment and labour exploitation, the Financial Administration also included construction, transport and hospitality industry as at-risk sectors in its annual work plan for 2025. These are on-the-spot checks, which also focus on identifying victims of trafficking in human beings. In 2025, the Financial

Administration plans to carry out 6,050 supervisions under the Prevention of Undeclared Work and Employment Act (ZPDZC-1) and under the Transitional Provision of Services Act (ZČmIS-1).

**c) train labour inspectors throughout the country, as well as law enforcement officers, prosecutors and judges, on combating human trafficking for the purpose of labour exploitation and the rights of victims;**

In line with the Action Plan, annual staff education and training is provided, both in Slovenia and abroad.

In 2023:

- the Labour Inspectorate organised annual training for all employees in Kranjska Gora, which included the topic of combating trafficking in human beings;
- a representative of the Labour Inspectorate attended the Employment Service of Slovenia's training on employing foreigners;
- a representative of the Labour Inspectorate and a representative of the Slovenian police attended a preparatory meeting for JAD 2023, organised by EMPACT and European Labour Authority in Leiden, the Netherlands;
- a meeting of representatives of EU inspectorates and EU police forces on the topic of labour exploitation, organised by EMPACT, was held in Paris, France;
- a representative of the Labour Inspectorate participated in a video conference on the combating trafficking in human beings entitled "Boundaries and Frontiers in Human Trafficking", organised by the Task force Austria in Vienna;
- a representative of the Labour Inspectorate participated in a video training on trafficking in human beings and labour exploitation, organised by CEPOL;
- two representatives of the Labour Inspectorate attended an expert meeting on the topic of trafficking in human beings, organised by the Ministry of the Interior of the Republic of Slovenia at Brdo pri Kranju;
- two representatives of the Labour Inspectorate attended a training entitled "Preventing, Combating and Responding to Trafficking in Human Beings in the Context of Migration", organised by the UNHCR, the Council of Europe, the Ministry of the Interior of the Republic of Slovenia and the Ključ Society – Centre for Combating Trafficking in Human Beings.

In 2024:

- staff training attended by 110 Labour Inspectorate employees was organised, with combating trafficking in human beings included among the topics covered;
- two inspectors participated in a video seminar addressing prevention and deterrence of undeclared work in supply chains involving (multiple) employment agencies through which third-country nationals work in the EU;
- four inspectors attended a round table on forced labour with the focus on identification and prosecution of the crime of trafficking in human beings in Slovenia, organised by the Ključ Society;
- a representative of the Labour Inspectorate and a representative of the Slovenian police attended a preparatory meeting for JAD 2024 in Strasbourg, France;
- the Labour Inspectorate representative responsible for coordinating the implementation of the JAD in the Republic of Slovenia attended the EMPACT Analytical meeting on Labour Exploitation in Stockholm, Sweden;
- a representative of the Labour Inspectorate attended a training course on combating trafficking in human beings, organised by CEPOL and ELA in Cyprus, and received a Certificate of Completion.

As trafficking in human beings is one of the most serious and heinous crimes, inspectors from Slovenia and abroad not only receive specialised training in the field of trafficking in human beings, but also attend education and training courses aimed at enhancing their ability to detect and identify THB.

The 2025–2026 Action Plan also provides for training of inspectors in this area. The Labour Inspectorate will continue to provide staff training in accordance with the adopted programme. In 2025, the employment relationship inspector attended the EMPACT meeting and in June, she will attend the preparatory meeting for JAD 2025 organised by ELA and EMPACT in Madrid, Spain. At the invitation of the OSCE Special Representative and Co-ordinator for Combating Human Trafficking, several inspectors of the Labour Inspectorate will take part in a two-day on-site workshop on enhancing skills for identifying and referring human trafficking victims as part of the OSCE project "Preventing and Responding to Trafficking in Human Beings Amid the Humanitarian Crisis", to be held on 4 and 5 June 2025 in Vienna, Austria.

In line with established practice, the Financial Administration of the Republic of Slovenia also provided its staff with training on trafficking in human beings in 2023 and 2024. The training provided participants with insights into current trends in trafficking in human beings and legislative developments, placing particular emphasis on the issue of

identifying forced labour or labour exploitation. In 2023, 49 staff members of the Financial Administration took part in the training, and 72 in 2024. The annual training plan for employees in 2025 also provides for training on the detection of trafficking in human beings, which will be targeted at both inspectors and members of the mobile unit of the Financial Administration. In addition to the annual training, the 2025–2026 Action Plan also foresees the preparation of guidelines for the work of the Financial Administration staff in the field of detection of trafficking in human beings and labour exploitation.

- d) strengthen co-operation between labour inspectors, law enforcement officers, tax authorities, trade unions and other civil society actors, with a view to collecting evidence necessary for successfully investigating and prosecuting cases of human trafficking for the purpose of labour exploitation (paragraph 154).**

The Labour Inspectorate recognises the importance of cooperation between inspectors and other labour market stakeholders, including in combating trafficking in human beings. It therefore focuses particular attention on areas that, according to reports, monitoring activities, and identified infringements, present the greatest risk of rights violations for a considerable number of workers.

From 2023 to 2025, the Labour Inspectorate was part of the working group of the Ministry of the Economy, Tourism and Sport of the Republic of Slovenia to prepare positions on the proposal for a Regulation of the European Parliament and of the Council on prohibiting products made with forced labour on the Union market. REGULATION (EU) 2024/3015 of the European Parliament and of the Council of 27 November 2024 on prohibiting products made with forced labour on the Union market and amending Directive (EU) 2019/1937 was adopted on 12 December 2024. The Labour Inspectorate will maintain its involvement in the working group of the Ministry of Economy, Tourism and Sport on the implementation and transposition of the Regulation into the Slovenian legal system.

In 2023 and 2024, the Slovenian Labour Inspectorate cooperated with the Dutch Labour Inspectorate and the German tax authority on inspection activities. At the national level, close cooperation was maintained with the Financial Administration, the Police, the Market Inspectorate, the Inspectorate for Agriculture, Forestry, Hunting and Fisheries, the Sport Inspectorate, the Inspectorate for Protection against Natural and Other Disasters, the Civil Aviation Agency, as well as the Pension and Disability Insurance Institute and the Employment Service.

For 2025, cooperation with Italian representatives on road traffic controls is planned, while a bilateral meeting with Croatian representatives has been held to organise cross-border controls. Participation in two European actions, namely JAD (trafficking in human beings) and WEEK OF ACTION (joint inspections of construction sites), are also planned.

To ensure the fullest possible respect for workers' rights, the Labour Inspectorate focuses especially on prevention, awareness raising, and on emphasising responsibility. Together with the Embassy of India, the Labour Inspectorate co-organised an event at the end of 2024 focusing on the key rights of foreign workers in Slovenia, which included an overview of Slovenian labour legislation, procedures for reporting violations and mechanisms available to protect the rights of employees. This year, the Labour Inspectorate is also teaming up with the Employment Service and several other stakeholders (representatives of the Health Insurance Institute of Slovenia, IOM, and UNHCR) on the organisation of "Integration of Migrants into the Labour Market" events, which will take place in various locations across Slovenia.

We are aware that taking measures to effectively combat trafficking in human beings, to which the Republic of Slovenia is bound by international instruments, requires a comprehensive approach, encompassing the prevention of trafficking in human beings, the identification and protection of victims, as well as effective investigation, prosecution and punishment of the perpetrators of the crime of trafficking in human beings. This effort involves many stakeholders beyond the Police, who bear the primary responsibility for prosecuting criminal acts. Therefore, we will continue to prioritise interconnectivity and the exchange of information and data among all relevant parties.

In relation to monitoring the employment and work of foreign nationals, the Financial Administration also cooperates with the Police, the Labour Inspectorate and other stakeholders such as the Employment Service, the Health Insurance Institute, administrative units and the Ministry of Labour, Family, Social Affairs and Equal Opportunities.

The Financial Administration also cooperates with the Labour Inspectorate and the Slovenian police on Joint Action Days against trafficking in human beings (JAD THB).

**Identification of victims of trafficking**

**23. GRETA urges the Slovenian authorities to step up their efforts to identify victims of trafficking, paying increased attention to detecting victims of trafficking amongst migrants and asylum seekers, including by:**

**a) providing systematic training and issuing clear operational instructions to all relevant staff of reception centres and immigration detention centres on identifying and responding to cases of human trafficking and on conducting gender- and culturally-sensitive interviews with migrants and asylum seekers;**

Professional staff working in accommodation facilities under the responsibility of the Government Office for the Support and Integration of Migrants receive regular and systematic training on vulnerable categories of persons. Informative, awareness-raising and debriefing interviews and workshops are therefore conducted with all persons accommodated. During the interviews, the persons accommodated are also encouraged to pursue their education and to enter the labour market and are given the necessary support. Through these interviews, a safe environment is created and potential vulnerabilities are identified, including trafficking in human beings.

On 17 and 18 December 2024, the Ministry of the Interior organised in-house training for public employees of the Migration Directorate. The topics covered included the fight against trafficking in human beings, identification in international protection procedures and timely action. The training was attended by 18 officials working in the field of international protection procedures and family reunification. The aim of the training was to equip decision-makers and staff of the Operational Affairs Section of the International Protection Procedures Division who come into contact with victims or potential victims of trafficking in human beings (applicants for international protection) with the knowledge and skills necessary to detect and address the signs of trafficking in human beings, to identify victims, and to prepare and conduct an interview with a victim or a potential victim of trafficking in human beings.

On 15 and 29 February 2024, the police conducted training for 40 police officers from the Centre for Foreigners.

The Ministry of Foreign and European Affairs regularly addressed the issue of trafficking in human beings as part of the Consular Service's preparation for departure to diplomatic missions and consular posts. Trafficking in human beings was also addressed during the consular meeting on 5 October 2023. Consular staff were presented with specific concrete cases that may be encountered by the staff of diplomatic missions and consular posts. Moreover, the issue of trafficking in human beings was included in the consular examination, ensuring that consular officers are able to successfully identify potential cases of trafficking in human beings.

Diplomats and consular officers posted abroad receive regular and systematic training to detect potential cases of trafficking in human beings and to conduct procedures with foreigners in accordance with the Slovenian legislation, while consistently detecting and responding to signs that would suggest the possibility of trafficking in human beings. Procedures were conducted with particular sensitivity towards the most vulnerable groups.

As part of their anti-trafficking efforts, diplomatic missions and consular posts informally learn about the frequency and forms of cases of human trafficking during their contacts with other diplomatic missions and consular posts and representatives of the receiving country. In order to identify and assist potential victims of trafficking in human beings even more effectively, the Inter-ministerial Working Group for Combating Trafficking in Human Beings plans to develop guidelines for the work of consular officers this year, in line with the current action plan.

**b) recruiting or otherwise engaging a sufficient number of trained interpreters and cultural mediators to more effectively interact with migrants and asylum seekers;**

The Government Office for the Support and Integration of Migrants has contracts with interpreters and companies that provide translations into various languages. Interpreters are provided in all areas of ensuring the rights of residents. The office also employs public servants who speak the languages spoken by migrants.

**c) securing adequate funding for specialised NGOs to enable them to effectively take part in the identification of victims of trafficking, including through having regular access to facilities for asylum seekers and detained migrants;**

The Government Office for the Support and Integration of Migrants regularly publishes calls for tenders for various programmes aimed at providing support, raising awareness and educating the public. The programmes currently being implemented and those in the process of signing contracts are aimed at working with vulnerable groups and informing and raising awareness among victims of human trafficking. All non-governmental organisations that

implement programmes on the basis of contracts or agreements visit all locations according to a predetermined schedule. These schedules are posted on the accommodation centres' notice boards. In addition, different non-governmental organisations carry out activities outside the accommodation facilities. All residents are informed about these activities as well.

**d) systematically informing all asylum seekers, in a language they can understand, about their rights in the framework of the asylum procedure, and the legal rights and the services available to victims of trafficking;**

In the area of informing persons declaring the intention to file, applicants for international protection and persons under temporary protection, the implementation of the mechanism for "identifying, assisting and protecting victims of human trafficking and/or sexual abuse in the procedures of recognition of international protection in Slovenia" (PATS project) continued in all accommodation facilities of the Government Office for the Support and Integration of Migrants. The aim of the project is to raise awareness among persons who in most cases do not recognise the dangers and consequences of human trafficking, sexual violence and gender-based violence, and to encourage them to actively participate in the prevention of various forms of exploitation through an appropriate approach. In addition to providing information (in various forms), additional activities are also implemented, such as interactive workshops, group lectures, etc.

The Office for the Support and Integration of Migrants concluded a contract with the Ključ Society for the implementation of the project, which:

- carried out 457 individual information sessions in 2023, with 2,534 people participating in group information sessions;
- carried out 741 individual information sessions in 2024, 10 groups for women and 345 group information sessions.

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

**e) ensuring that pre-removal risk assessments prior to all forced removals from Slovenia fully assess risks of trafficking or re-trafficking on return, in compliance with the obligation of non-refoulement. In this respect, reference is made to GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection;**

The lack of systematic risk assessments and inadequate cooperation between institutions increases the likelihood that vulnerable persons will be overlooked. We agree that the risk of re-victimisation must be thoroughly assessed in every return or removal procedure, and we are aware that inter-institutional cooperation and systematic monitoring of the risks of trafficking in human beings must be strengthened in this area. To this end, various activities were carried out in 2024, including a workshop in cooperation with the UNHCR (more information in point 24.d). In addition, the Slovenian police are currently preparing a new individual risk assessment for victims of human trafficking, which is being coordinated with the Ministry of Justice.

**f) providing adequate and safe living conditions at the Asylum Centre in Ljubljana with a view to preventing possible recruitment of asylum seekers by traffickers;**

Improvements have been made to the Asylum Centre in Ljubljana with the aim of improving living conditions. The number of employees has been increased as well, and they receive ongoing training with the aim of improving the psychosocial care provided to residents. In addition, the Government Office for the Support and Integration of Migrants is working intensively to find solutions for the accommodation of single men.

**g) ensuring that as soon as there are reasonable grounds to believe that a foreign national placed at the Asylum Centre is a victim of THB, he or she is moved to a shelter for victims of THB. (paragraph 161).**

If there are reasonable grounds to believe that a person is a victim of human trafficking, the Government Office for the Support and Integration of Migrants immediately notifies the competent institutions, and the person is immediately transferred to another location and provided with appropriate support and assistance.

**Identification of, and assistance to, child victims of trafficking****24. GRETA once again urges the Slovenian authorities to make efforts to improve the identification of, and assistance to, child victims of trafficking, in particular by:**

- a) **ensuring that relevant actors take a proactive approach and increase their outreach work to identify child victims of THB, including by continuing to pay attention to Roma children and unaccompanied foreign children;**

In Slovenia, there are generally not many cases where children are identified as victims of human trafficking. In 2023, the police identified one minor victim of trafficking who was successfully placed in foster care through the Social Work Centre, while in 2024 there were no minor victims of trafficking. Nevertheless, the Inter-ministerial Working Group for Combating Trafficking in Human Beings continues to pay special attention to measures for identifying children who are victims of trafficking.

Last year, European Anti-Trafficking Day was dedicated to this issue. To this end, the Ministry of the Interior financed a project carried out by a non-governmental organisation and aimed at raising awareness of human trafficking, with a focus on child sexual abuse, as well as raising awareness among potential users of services provided by victims of human trafficking. As part of the project, various activities to raise awareness among vulnerable groups and the general public were carried out. A group of young people from various professional centres where they are placed was selected to raise awareness among vulnerable groups. The activities were carried out at the Višnja Gora Professional Centre, the Jarše Youth Centre, and the Kranj Professional Centre. Discussions were organised on the risks of sexual exploitation of young people, the methods used to recruit potential victims in person and via social networks, the links between prostitution and human trafficking, and the help available to victims. The wider public was made aware of the issue through a 30-second TV spot and posts on social media. In addition, an expert meeting was organised on 18 October 2024, which was attended by the National Anti-Trafficking Coordinator, among other guests. The meeting was attended by 84 participants from the professional public, ten speakers, and nine media representatives. The project activities lasted from 18 October to 25 October 2024 and were concluded on 14 November 2024, when the spot was broadcast during the last domestic football match of the Nations League.

- b) **providing further training to stakeholders (police, asylum and migration authorities, service providers, NGOs, centres for social work) as well as guidance on the identification of child victims of THB for different forms of exploitation;**

Relevant stakeholders who encounter cases of human trafficking in their work received regular training during the reporting period, including on identifying child victims of trafficking.

The police regularly train criminal investigators at national and regional level, as well as police officers at local level. In doing so, they focus on identifying the forms of trafficking in human beings, indicators for detecting potential victims of trafficking in human beings and perpetrators, and on knowledge of further specific procedures for dealing with victims and conducting investigations in pre-trial proceedings. These training courses are regular and take place throughout the year for various police units. We would like to highlight the training for criminal investigators from regional criminal police divisions, which took place in June 2023 and focused on ensuring a victim-centred approach. Particular emphasis was placed on vulnerable groups, including children.

Over the past year, employees of the Government Office for the Support and Integration of Migrants have participated in several training courses on identifying, and providing psychosocial care to, vulnerable groups, including children and potential victims of human trafficking. In 2024, two employees attended training organised by the European Asylum Agency and obtained a trainer certificate in the field of human trafficking. They will conduct training for their colleagues. The employees also received instructions on how to act if they detect signs of human trafficking.

On 23 November 2023, the Social Chamber held a seminar for professional workers and associates in social work centres, focusing on work with foreigners, refugees, migrants and victims of human trafficking. In the first part of the seminar, participants learned about the challenges and examples of good practices in working with foreigners, refugees and other persons with a migrant background. Different forms of exploitation of child victims of human trafficking were also discussed separately. The final part of the training took the form of an interactive workshop, during which participants were presented with a case study and sought solutions to open questions relating to the competences of social work centres. The seminar was attended by 51 participants.

In 2024, the seminar for professional workers and associates in social work centres was held on 5 November 2024. The first part of the seminar focused on migration and the integration of immigrants, as well as on the network of institutions, organisations and programmes supporting migrants. In the second part of the seminar, participants

learned about migrant statuses, legal frameworks and migrants' rights. They focused on young migrants and unaccompanied children, with an emphasis on children who are victims of human trafficking and various forms of exploitation, and how to help them. Participants were presented with examples of good practice. This was followed by an interactive part with a case study, in which seminar participants raised some dilemmas that arise in their work and are related to the competences of social work centres. Challenges and good practices in helping migrants and unaccompanied children integrate, with a focus on child victims of human trafficking, were also presented. The seminar was attended by 52 participants.

On 12 April 2024, as part of the SIFOROMA6 project, the Government Office for National Minorities held a professional lecture in Ljubljana entitled Recognising Early and Forced Marriages in the Roma Community and Taking Action in these Cases. The lecture was intended for court experts from relevant fields (clinical psychology, family medicine, family psychology, social work, child and adolescent psychiatry).

On 28 September 2023, the Ministry of the Interior organised a professional training course on human trafficking with a focus on identifying forced marriages, which was intended for employees of administrative units, especially those working as registrars, as they may encounter forced marriages when registering marriages. The training was conducted remotely via videoconference, with the participation of representatives of the police and the Government Office for National Minorities, who presented the Manual on Identifying Early and Forced Marriages in the Roma community and on Taking Action in these Cases. More than 170 administrative unit employees participated in the training. In 2024, the Ministry of the Interior organised similar professional training, which was attended by 219 administrative unit employees. In addition to registrars, the training was also attended by employees who issue single residence and work permits to non-EU foreigners.

In 2023 and 2024, the Ministry of the Interior continued to systematically raise awareness among children and young people about the dangers of human trafficking, its forms and appropriate measures and self-protection behaviour in primary and secondary schools throughout Slovenia. In 2023, 280 workshops were held, 146 in primary schools and 134 in secondary schools, attended by 5,267 pupils and 304 teachers. In 2024, 155 workshops were held, 69 in primary schools and 86 in secondary schools, attended by 3,237 pupils and 181 teaching staff.

- c) **providing specialised support and services beyond the recovery and reflection period which are adapted to the needs of child victims of trafficking, including appropriate accommodation, access to education and vocational training, and ensuring long-term monitoring of their reintegration;**

Assistance to child victims of human trafficking is formally guaranteed in Slovenia through programmes for crisis and safe accommodation of victims, which are run by non-governmental organisations. The programmes require providers to offer assistance and protection to child victims of human trafficking, although for several years they have been pointing out that with the existing financial resources they are unable to provide adequate professional staff for providing 24-hour care for child victims. Consequently, in practice, care for these vulnerable groups is not provided under crisis and safe accommodation programmes, which means that each case of a child victim is dealt with individually and a solution tailored to the needs of each individual is always found.

Nevertheless, the Inter-ministerial Working Group for Combating Trafficking in Human Beings continues to actively seek appropriate solutions for the accommodation of unaccompanied children, who represent a particularly vulnerable group. In 2023 and 2024, the National Anti-Trafficking Coordinator held several meetings with various stakeholders, but no concrete solutions have yet been found. Discussions are currently underway with the Government Office for the Support and Integration of Migrants in this regard.

We would also like to point out that accommodation for migrant children was established in March 2024. Children are accommodated there regardless of their status in the Republic of Slovenia. They are provided with 24-hour care and also benefit from various support activities carried out by both employees and various non-governmental organisations. Employees receive regular training in the field of vulnerability and in providing support and appropriate care for children.

- d) **addressing the problem of unaccompanied foreign children going missing while in the care of the state by providing suitable safe accommodation and trained supervisors or foster parents, and ensuring that there are clear procedures for tracing missing children and notifying relevant authorities (paragraph 169).**

In order to find solutions for identifying and protecting potential child victims of trafficking among applicants for international protection, a meeting with non-governmental and humanitarian organisations and the UNHCR was convened on 18 April 2024. In order to improve the identification of potential child victims of trafficking among applicants for international protection, a single communication channel was established for the effective transfer of

information on trafficking in human beings between relevant stakeholders. Furthermore, on 21 October 2024, the Ministry of the Interior, together with the UNHCR, organised a workshop with the aim of standardising procedures to improve the identification of child victims among applicants for international protection. It was agreed that the content of the standardised procedures would be included in the Manual, as its comprehensive update is being prepared in accordance with the current Action Plan for Combating Trafficking in Human Beings for the period 2025-2026.

It has been established that the safety of identified children among applicants for international protection in Slovenia is not usually at risk, which is why the police do not consider them to be victims of human trafficking. However, there is a potential risk that they may become victims of human trafficking at their final destination or during their journey. Regardless of this, children are provided with all information about the dangers of human trafficking, as well as appropriate protection, assistance or care. It should also be noted that all decisions are voluntary and that we can only advise them and offer them the available forms of assistance. Most of these young people/children leave Slovenia of their own accord within a few days. They are advised that if they are exploited in another European Union country, they can turn to the Red Cross, which operates in most EU countries, or other organisations offering assistance, or notify the police. All PATS project implementers and the Government Office for the Support and Integration of Migrants staff are professionally trained to identify victims of human trafficking.

### **Assistance to victims of trafficking**

#### **25. GRETA once again urges the Slovenian authorities to ensure that access to assistance for victims of THB is not made conditional on their co-operation in the investigation and criminal proceedings, but is based on their individual needs (paragraph 175).**

Assistance to victims of human trafficking continues to be provided on the basis of Article 4 of the Act ratifying the Council of Europe Convention on Action against Trafficking in Human Beings. Within this framework, the Government of the Republic of Slovenia finances two projects to assist victims of human trafficking (crisis and safe accommodation), which are implemented by non-governmental organisations selected on the basis of a public call for tenders.

An important source of protective measures for victims of human trafficking is the Manual adopted by the Government of the Republic of Slovenia in 2016. Chapter IV of the Manual (Accommodation of victims of human trafficking, Care for victims of human trafficking – crisis accommodation) stipulates that victims are entitled to assistance and support before and during the criminal proceedings and for an appropriate period after their conclusion. The Manual also stipulates that during this period, assistance and support are not conditional on the victim's cooperation in pre-trial or criminal proceedings.

After their stay in crisis accommodation, victims may continue their stay under a longer-term accommodation programme (Care for victims of human trafficking – safe accommodation). Before each transfer of a victim to a safe environment, the National Anti-Trafficking Coordinator appoints a multidisciplinary team, which includes a representative of the police. The multidisciplinary team is informed of all circumstances that could affect the implementation of the programme, including the status of pre-trial proceedings and any personal circumstances that may cause the victim to express a wish not to participate in pre-trial and criminal proceedings. Based on the information received, the multidisciplinary team decides whether the victim can be placed in a safe environment. We would like to emphasise that, in line with current practice, there has never been a case where a victim has been denied long-term assistance and protection under the Care for victims of human trafficking – safe accommodation programme due to their (non-)cooperation with law enforcement authorities. Victims therefore receive protection and assistance regardless of the course of criminal proceedings or their cooperation in those proceedings.

### **Recovery and reflection period and residence permits**

#### **26. GRETA urges the Slovenian authorities to 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 and all the measures of protection and assistance envisaged in Article 12, paragraphs 1 and 2, of the Convention during this period (paragraph 181);**

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.

**27. GRETA also considers that the Slovenian authorities should keep under review the practical application of the provision on granting temporary residence permits to victims of THB, in particular in the light of the newly added ground for refusal of a temporary residence permit when making false statements, and ensure that the possibility to grant residence permits owing to the personal situation of the victim is effectively applied in practice (paragraph 182).**

Pursuant to Article 50 of the Foreigners Act, victims of trafficking are allowed to stay in the territory of the Republic of Slovenia and their stay may be extended or they may be issued a residence permit and their residence permit may be extended if there are personal circumstances justifying that. The requirement regarding personal circumstances covers a range of situations, and the assessment must take into account the victim's safety, health, family circumstances or any other factor relevant to the assessment of their personal circumstances. On the other hand, a temporary residence permit is not issued to a victim of human trafficking if in a permit procedure there is a reasonable suspicion the victim's complaint is false or it can be reasonably concluded that their cooperation is false. This is decided by the authority responsible for issuing residence permits, with due regard to the material truth.

At its last meeting held on 30 May 2025, the Inter-ministerial Working Group for Combating Trafficking in Human Beings adopted a decision that the Ministry of the Interior will, based on data provided by administrative units (such as the number of residence permit applications submitted by victims of trafficking, the types of decisions issued, the duration of procedures, etc.), prepare an analysis of the implementation of Article 50 of the Foreigners Act (ZTuj-2) concerning the issuance of residence permits to victims of trafficking in human beings in practice. If necessary, the Ministry will also update the existing guidelines to support the work of administrative units in this area.